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18 ENVIRONMENTAL MANAGEMENT

18.1 Introduction

It is the intention of Peel Environmental Ince Ltd to conduct their activities in such a way that the impact of the proposed development (including all of its component parts) on the environment during design, construction and operation ~~of the proposed development~~ is minimised. The following sections establish the means by which this would be undertaken and apply to both DBERR and CCC applications and both in combination, except where stated otherwise.

~~This Environmental Statement summarises the assessment process undertaken to date. It identifies the impacts that will arise from the proposed development during construction and operation and the mitigation measures that are required. The necessary mitigation measures will be included in project procedures and method statements as the project progresses.~~

~~This project~~The proposed development has been designed to limit environmental impacts as far as possible with additional habitat creation, landscape screening and effective drainage systems. The project has also been designed to minimise the amount of heavy HGV traffic by encouraging the use of rail and water modes of transport.

In order to ensure that ~~these environmental~~ standards are maintained during construction, Peel Environmental Ince Ltd and the construction contractor(s) employed ~~will~~would develop a project Environmental Management Plan (EMP), as a part of an overall Environmental Management System (EMS) for the site. The following ~~is~~s outlines the requirements of the EMP and summarises the likely impacts and proposed mitigation measures. These measures are likely to form the basis for ~~any~~ planning conditions or Section 106 agreements.

During operation, as an Eco-Industrial park, the RRP ~~will~~would be expected to maintain the highest standards of environmental management. In order to achieve this an Environmental Management System (EMS) ~~will~~would be established to cover the operational site.

18.2 Environmental Impact Assessment

18.2.1 *Mitigation and Monitoring*

EIA is an on-going process. As a result of the ecological, archaeological and geotechnical surveys undertaken to date, the need for mitigation and monitoring has been identified. This ~~will~~would be undertaken during the detailed design and construction stages, and for some activities ~~continue~~ during operation. Mitigation measures proposed are summarised in Tables 18.1 and 18.2.

18.2.1 *Consents and Licences*

As well as consent under the Town and Country Planning Act and under Section 36 of the Electricity Act, a number of other consents ~~could are likely to~~ be required for the proposed development. Since the original (January 2006)~~previous~~ application to the DTI (now DBERR) for the RRD~~DFP~~ development, a Pollution Prevention and Control (PPC) permit has been granted for the RDF plant by the Environment Agency.

In addition, an application has been made for the permanent diversion of the C-class road and byway along Marsh Lane.

The identification and granting of all consents, licences and permissions during construction ~~will~~would be the responsibility of the main works contractor unless otherwise agreed. During operation, they~~se~~ ~~will~~would be the responsibility of the site management, with some responsibility delegated to industrial users.

Other possible consent requirements could include the following:

- Environment Agency consents under the *Water Resources Act 1991* or the *Land Drainage Act 1991* for works affecting watercourses (including drainage outfalls);
- Environment Agency consent under the *Water Resources Act 1991* for any proposed abstractions or discharges from watercourses;
- ~~English Nature~~Natural England consent under the *Wildlife & Countryside Act 1981* or *Conservation (Natural Habitats) Regulations 1994* for works affecting protected species;
- Hazardous Substances Consent; ~~and~~
- Waste Management Licensing; ~~and~~
- ~~Consent for footpath closure/diversion.~~

Note that this list is by no means exhaustive.

18.2.3 External Communications

Peel Environmental Ince Ltd and its project team have consulted with a range of external consultees in preparing the development proposals and this EIA (see Section 1). The aim has been to establish the likely implications of the project at the earliest possible stage. In this way, contentious issues can be dealt with promptly.

Liaison ~~will~~would continue with residents likely to be affected by development activities and with external consultees during both construction and operational phases.

18.3 Environmental Management During Construction

18.3.1 Roles and Responsibilities

18.3.1.1 Role of Peel with respect to Environmental Management

Peel Environmental Ince Ltd ~~will~~would ensure that a robust ~~Environmental Management System-EMS~~ ~~Environmental Impact Assessment which~~EIA, ~~which~~ is designed to assess all of the potential effects and minimise the environmental impacts of the project.

Prior to construction, ~~for all applications,~~ the key deliverables from the project ~~Environmental Management System (EMS)~~ are likely to be:

- the production of a project specific ~~Environmental Management Plan~~EMP for ~~remediation and~~ construction ~~and site investigation~~ activities including a

description of environmental constraints and the procedures and ~~m~~Method ~~s~~Statements to be used;

- procedures for the selection, management and auditing of sub contractors; and
- ~~m~~method ~~s~~statements, procedures and plans covering the proposed ecological, archaeological and landscape mitigation outlined in this ES (for example detailed landscape planting plans), ~~which is summarised in Table 18.1. Note that since the original application in January 2006, a draft~~These would implement the plans and mitigation submitted as a part of the application, for example, the Habitat Creation and Management Plan ~~has been~~ produced for the ecological mitigation areas; ~~which is attached as an appendix to this ES (see Appendix 10.11).~~

18.3.1.2 Role of the Contractor with respect to Environmental Management

~~The~~ A principal contractor ~~who will~~would be appointed to facilitate the remediation and construction phases, ~~and will~~acknowledge the operation of an effective ~~Environmental Management System~~EMS as being an essential part of the project. Provision of an effective system for the control of environmental issues ~~will~~would be made a condition of contract. The contractor ~~will~~would be responsible for ensuring that his operations do not damage the environment, and for properly managing waste, materials and the workforce on site.

18.3.2 Legislation and Best Practice

A vast amount of environmental and other legislation is applicable to major construction projects. This includes the following:

- Clean Air Act, 1993;
- Environmental Protection Act, 1990;
- ~~□ Environmental Protection (Duty of Care) Regulations, 1991;~~
- ~~□ Hazardous Waste Regulations 2005;~~
- Environment Act, 1995;
- Land Drainage Act 1991;
- Noise and Statutory Nuisance Act, 1993;
- Pollution Prevention and Control Act 1999;
- ~~□ Groundwater Regulations, 1998;~~
- Water Act 2003;
- ~~□ Water Resources Act, 1991;~~
- ~~□ Noise and Statutory Nuisance Act, 1993;~~
- ~~□ Clean Air Act, 1993;~~
- ~~Control of Pollution (Oil Storage) Regulations, 2001;~~

- Wildlife and Countryside Act, 1981 (as amended); ~~and~~
- [Control of Pollution \(Oil Storage\) Regulations, 2001;](#)~~Hedgerow Regulations, 1997.~~
- [Environmental Protection \(Duty of Care\) Regulations, 1991;](#)
- [Groundwater Regulations, 1998;](#)
- [Hazardous Waste Regulations 2005;](#) and
- [Hedgerow Regulations, 1997.](#)

The developer and construction contractor ~~will~~will ensure that measures are put in place to comply with all legislation. This ~~will~~will be detailed in the ~~Environmental Management Plan~~EMP (see Section 18.3.3 below).

Legislation provides a minimum standard to adhere to. The ~~construction~~ project ~~will~~will look, wherever possible, to set an example of best practice in its construction activities, for example with regards to recycling of materials, oil and chemical storage, and maintenance of plant and equipment.

As well as adhering to the above, the project ~~will~~will aim to meet the requirements of best practice standards such as the Environment Agency Pollution Prevention Guidance Notes (PPGs), in particular:

- [PPG 1 - General guide to the prevention of water pollution](#)
- [PPG 2 - Above ground oil storage tanks](#)
- [PPG 3 - The use and design of oil separators](#)
- [PPG 5 - Works in near or liable to affect watercourses](#)
- [PPG 8 - Storage and disposal of used oils](#)
- [PPG 11 - Preventing pollution at industrial sites](#)
- [PPG 13 - High pressure water and steam cleaners](#)
- [PPG 18 - Control of spillages and fire fighting run-off](#)
- [PPG 19 - Garages and vehicle service centres](#)
- [PPG 23 - Maintenance of Structures over Water](#)
- [PPG 26 - Storage and Handling of Drums & Intermediate Bulk Containers](#)
- ~~[PPG 27 - Installation, decommissioning and removal of underground storage tanks](#)~~
- ~~PPG01 General guide to the prevention of water pollution;~~
- ~~PPG05 Works in near or liable to affect watercourses;~~
- ~~PPG06 Working at demolition and construction sites;~~
- ~~PPG11 Preventing pollution at industrial sites; and~~
- ~~PPG21 Pollution incident response planning.~~

18.3.3 *Project Environmental Management Plan*

18.3.3.1 *Purpose of an Environmental Management Plan (EMP)*

The purpose of the production and maintenance of the ~~Environmental Management Plan~~ EMP, and associated documents, is to ensure that the environment is suitably protected before, during and after construction by ensuring that legislative and regulatory requirements are met.

18.3.3.2 *Environmental Legislation*

The EMP ~~will~~would detail the practical measures required to ensure that legislative and regulatory requirements, including those set out in planning conditions, are met. These ~~will~~would include the requirement to obtain relevant licences and consents, keep waste disposal records; monitor water abstraction or discharge points etc.

18.3.3.3 *General Principles of the EMP*

The ~~Environmental Management Plan (EMP)~~ ~~will~~would set out the ~~potential impacts from the construction, and the mitigation proposed to address the potential impacts from construction, as identified~~ within this Environmental Statement within a framework to be implemented as part of the construction project (or discrete projects as phases are progressed) for either or both applications. It would aim to ensure that all construction activities take these mitigation measures into account. The EMP ~~will~~would be updated regularly as the design proceeds.

~~Three~~ A number of additional plans ~~would normally~~~~will~~would also be produced in support of the EMP, these ~~are~~include:

- Waste Management Plan (WMP);
- ~~Pollution Prevention~~Surface Water Management Plan (SWMPPP); ~~and~~
- Landscape Master Plan (LMP); and-
- Habitat Creation and Management Plan (HCMP).

These ~~three~~ plans ~~will~~would provide a system against which to monitor and audit environmental performance. The plans ~~will~~would detail the practical methods required to ensure work is completed in accordance with current best practice and to fulfil legislative and regulatory requirements.

18.3.3.4 *Development of the EMP*

The EMP, associated plans and method statements ~~will~~would be continually updated as required during construction.

18.3.4 *WNatural Resources and Elimination of Waste Waste Management Plan*

A variety of different materials ~~will~~would be used for construction of the ~~Resource Recovery Park~~RRP (or for the construction of the DBERR/CCC application components which make up the RRP). The project also involves removal of existing services which ~~will~~would produce waste materials. Wastes are likely to include metals, timber, brick ~~and~~& block and general wastes, as well as a small amount of hazardous material such as oils paints and coatings.

Prior to construction, a Waste Management Plan ~~will~~would be produced and implemented with respect to solid ~~and liquid~~ wastes. This ~~will~~would set at the requirements of the project including how the project ~~will~~would:

- ~~collect and~~ minimise the waste generated;
- reuse or recycle wherever possible;
- ~~collect,~~ separate, store and contain securely and label all wastes;
- allocate responsibility for waste management on site;
- employ suitable licensed waste contractor(s) and audit their licence(s); and
- monitor and periodically audit the waste management scheme and activities.

The key to minimising the production of waste is to implement the waste hierarchy of Reduce, Reuse, Recycle, Dispose. Reducing the amount of materials used also has the effect of minimising use of natural resources and reducing costs. ~~Careful management and phasing of the development will ensure that this is the case.~~

18.3.5 Surface Water Management Plan

A project specific Surface Water Management Plan ~~will~~would be developed for the project including measures such as:

- All onsite diesel storage tanks to be placed on hard standing ground within the construction compound. To reduce the risk of pollution via tank leakage, a double skinned tank container ~~will~~would either be used, or the tank ~~will~~would be double bundled with a capacity of 110% of the maximum stored volume as per the Control of Pollution (Oil Storage) Regulations 2001.
- Drip trays ~~will~~would be used under compressors, pumps, motors, redundant plant and during re-fuelling. These ~~will~~would be emptied and cleaned regularly especially after rainfall.
- Diesel bowsers ~~will~~would be double skinned and equipped with spill control kits.
- Control measures for controlling silt run-off to streams.
- All fuel storage and refuelling to be carried out at a minimum of 30m from watercourses.

This plan would build upon and implement the mitigation measures provided in Sections 6 and 7 of this ES.

18.3.6 Landscape Master Plan

Planting is the most effective form of mitigation to minimise visual impacts since much of the development is less than 20m high. In order to illustrate the proposed landscape structure of the proposed development in a more detailed format, a series of Landscape Masterplans (at A3) have been prepared for each application and are included at the end of Section 12.

18.3.7 Habitat Creation Management Plan

A draft Habitat Creation and Management Plan ~~is proposed to improve on the impoverished habitats currently found on the site.~~has already been created to provide

further detail on the extensive ecological proposed for the site. This has taken the mitigation described in Section 10 and formulated a series of 'prescriptions' covering each area set aside for mitigation.

The draft HCMP has been submitted to key consultees for comment and it is intended that following the grant of permission for all or part of the RRP, that a series of workshops and further consultations would be undertaken with all of the key ecological stakeholders to develop the plan further.

18.3.518.3.8 Environmental Awareness

Site briefings ~~will~~would be given to all construction staff through induction talks before the start of construction, and tool-box talks setting out key procedures during the works. This ~~will~~would help ensure that site personnel are fully aware of the key environmental issues of the site and the management procedures that have been set in place to mitigate impacts. Appropriate aids, such as relevant authority videos and leaflets ~~will~~would be used.

Notices ~~will~~would be erected on site to warn staff of the precautions and measures required when working close to environmentally sensitive areas. For the duration of construction, notices/signs ~~will~~would also be erected at the public highway accessing the site, and at other locations warning of construction traffic and other issues as appropriate.

18.3.618.3.9 Community Liaison

Consultation with the local community is an ongoing process, and ~~will~~would continue throughout the planning process and beyond. Regular meetings with ~~the~~ local community representatives ~~will~~would be held to provide updates on progress and details of upcoming works throughout the construction phase. Use ~~will~~would also be made of community notice boards to advise the local community of progress and provide details of specific issues.~~Use will be made of community notice boards and meetings with community representatives to update residents on progress and upcoming works as required.~~

18.3.718.3.10 Inspection and Auditing

The principal contractor ~~will~~would carry out site inspections and audits during the construction phase to ensure:

- that works comply with statutory, planning consent, and all contract requirements;
- to show that works are being undertaken in compliance with the project plans, procedures and method statements; and
- to demonstrate that remedial action has been taken, as necessary.

Although the intervals and scope for such inspections and audits would be in part determined by the principal contractor's own environmental management system and procedures, it is expected that documented environmental inspections of all construction activities would take place at least weekly and formal audits at least monthly throughout the construction period. This would follow an initial Pre-Construction Audit to ensure that all necessary consents are in place and to evaluate the systems put in place for the project.

In addition, the developer ~~will~~would undertake ~~monitoring its own inspections/audits~~ during ~~the~~ construction ~~process~~ to verify the contractor's environmental performance and compliance with environmental plans, procedures and method statements.

18.4 Environmental Management During Operation

18.4.1 Site Management

~~As an Eco-Industrial park, an An Environmental Management System EMSm~~ ~~will~~would be set up in order to ensure that the highest possible standards are maintained throughout the operation of the ~~RRP site in keeping with the aim of Peel Environmental to establish an environmentally sustainable development~~. With the aim of being accredited to ISO 14001, this ~~is likely to~~~~will~~would involve:

- an assessment of the environmental impacts of ~~an the~~ organisation;
- the development of an environmental policy;
- an environmental improvement programme with objectives and targets;
- clearly defined roles for all employees;
- environmental control procedures;
- defined systems for record keeping and document control;
- periodic auditing of the system; and
- a formal review of the system's effectiveness by senior management.

During operation, Peel Ports ~~will~~would be responsible for the site management of the canal berth and Peel Environmental ~~will~~would be responsible for the ~~rest-remainder~~ of the development. This ~~will~~would include maintenance of land set aside for community and ecological enhancement and mitigation, roads and internal landscaping. ~~Management of some aspects such as the main ecological mitigation areas may be given over to suitably experienced external organisations if this is deemed appropriate~~. The site management ~~will~~would be the first point of contact for local residents.

Peel Environmental ~~will~~would be responsible for site security. This ~~will~~would include regular monitoring of community areas to prevent vandalism and other anti-social behaviour.

Peel Environmental ~~will~~would also be responsible for further long-term environmental monitoring on the site. Requirements for such monitoring ~~will~~would be agreed during the planning and consenting process.

18.5 Environmental Management Summary

The most effective form of mitigation is to design a project to avoid environmental impacts at source. ~~The proposed development is project~~ has been designed as far as practicable to minimise environmental impacts and enhance certain parts of the environment. It has also been designed to high standards of sustainable development as discussed in Sections ~~2 and 17~~ and in the project Design and Access Statement (~~see Appendix 2.1~~).

The further measures outlined in this chapter, and those summarised in Table 18.1, ~~should~~ will help to ensure that the temporary impacts caused by construction, and the ongoing impacts of operational activities are minimised as far as possible.

Tables 18.1 and 18.2 below summarises the mitigation measures detailed in this document. These ~~are likely~~ would be expected to form the basis of planning conditions or Section 106 agreements.