

# ENVIRONMENTAL MANAGEMENT AND MONITORING PLAN (EMMP)

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## EXECUTIVE SUMMARY

This Environmental Management and Monitoring Plan (EMMP) presents the overarching approach to environmental management and monitoring during the construction phase for the off-site associated developments. The EMMP references a range of supporting documentation including a series of subject specific management plans (SSMPs) which outline, for specific environmental topics, the environmental management measures which have been identified as mitigation requirements within the **Environmental Statement** for the HPC Project, including proposed off-site associated developments. It also describes the relationship of the EMMP to the SSMPs and other relevant documentation.

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# 1. INTRODUCTION

## 1.1 Purpose and Scope

- 1.1.1 NNB Generation Company Limited (Company Number 06937084), part of EDF Energy, is the Company that will lead the new nuclear programme in the United Kingdom. For the purpose of this document, NNB Generation Company Limited is referred to as EDF Energy.
- 1.1.2 This Environmental Management and Monitoring Plan (EMMP) presents the overarching approach to environmental management and monitoring during the construction phase of the off-site associated developments which form part of the overall Hinkley Point C (HPC) Project. The EMMP makes reference to a range of supporting documentation including a series of subject specific management plans (SSMPs) which outline, for specific environmental topics, the environmental management measures which have been identified as mitigation requirements with the **Environmental Statement** for the HPC Project. The SSMPs also outline monitoring requirements which will enable the demonstration of compliance with applicable environmental quality criteria.
- 1.1.3 The EMMP and SSMPs will be used by EDF Energy and its appointed contractors who will have responsibility for work activities on the HPC development sites. The EMMP and SSMPs are “live” documents that will evolve as the HPC Project progresses.
- 1.1.4 The EMMP and SSMPs establish the parameters within which the construction works will take place, including:
- compliance with the environmental and sustainability commitments contained within EDF Energy’s relevant policy (**Sub-Appendix A1**) and **Sustainability Statement**;
  - compliance with relevant environmental legislation (see **Sub-Appendix A2**);
  - delivering environmental mitigation measures as identified within the **Environmental Statement** (and other environmental management measures as appropriate) for the HPC Project; and
  - monitoring, recording and reporting environmental performance so as to demonstrate compliance with these requirements.
- 1.1.5 In due course, environmental management arrangements will be developed for the post-construction phases of the HPC Project. Such arrangements are not specifically addressed in this document.
- 1.1.6 This EMMP (and the associated SSMPs) are intended to provide EDF Energy’s appointed contractors with sufficient information to produce their Construction Environmental Management Plans (CEMPs) and method statements. These contractor generated documents will set out details of the practical execution of the construction works and the implementation of the associated environmental management measures.

1.1.7 The geographical scope of this EMMP includes the construction working area of each off-site associated development (**Environmental Statement** – Chapter 3 of each relevant volume).

## 1.2 Structure of Environmental Management Documentation

1.2.1 The principal documents that address the environmental management measures and monitoring requirements during construction fall into four categories and are described in **Table 1.1**.

Table 1.1: Key Environmental Management Documents

Document level	Title of document	Description
1	<b>Environmental Statement and accompanying statements</b>	The <b>Environmental Statement</b> is the key document that details the environmental impacts and proposed mitigation measures associated with the design, construction and operation of the HPC Project.
2	<b>Environmental Management and Monitoring Plan (EMMP)</b>	<p>Produced and managed by EDF Energy, this provides the framework for the overall administration and control of environmental management measures and monitoring requirements.</p> <p>The <b>EMMP</b> is initially developed for the construction phase, but it provides for continuity in environmental management and control throughout the successive phases of the HPC Project. It enables linkages to be made between the environmental mitigation measures set out in the <b>Environmental Statement</b> and the provisions of the supporting <b>SSMPs</b>.</p>
3	<b>Subject-Specific Management Plans (SSMP)</b>	<p>Along with the EMMP, the <b>SSMPs</b> are intended to be one of the main reference documents from which contractors will compile their <b>CEMPs</b> and method statements. <b>SSMPs</b> have been compiled to address those environmental topics for which significant impacts have been identified in the <b>Environmental Statement</b> and thus where mitigation measures are required. The <b>SSMPs</b> include:</p> <ul style="list-style-type: none"> <li>• <b>Ecology Management and Monitoring Plan (EcMMP):</b> The EcMMP sets out the key requirements and management guidance in relation to ecology (both terrestrial and marine). Specifically, it identifies: (i) those sensitive ecological receptors (i.e. protected species, habitats and designated sites of ecological and geological value) that may be impacted by the works; (ii) those activities likely to impact upon the identified sensitive ecological receptors; and (iii) the mitigation and control measures to be adopted during construction.</li> <li>• <b>Soils Management Plan (SMP):</b> The SMP sets out the key requirements and management guidance in relation to soils in order to deliver the Landscape Restoration Strategy. The SMP includes outline proposals for the stripping, handling, transporting, storing and re-use of soils.</li> <li>• <b>Materials Management Plan (MMP):</b> The MMP provides a framework for the management and use of site-derived</li> </ul>



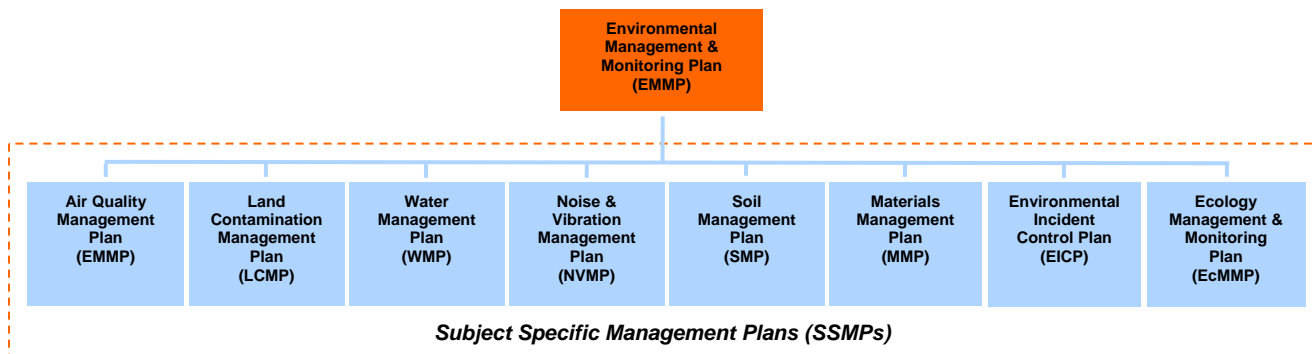
Document level	Title of document	Description
		<p>materials (principally soils, overburden and weathered and fresh rock) and demonstrates their suitability for their intended use.</p> <ul style="list-style-type: none"> <li>• <b>Noise and Vibration Management Plan (NVMP):</b> The NVMP sets out the key requirements and best practice guidance in relation to noise and vibration management. Specifically, it identifies: (i) those activities likely to generate noise and vibration; (ii) the thresholds of noise and vibration; (iii) the location of sensitive receptors that may be impacted by the construction works; and (iv) the mitigation and monitoring measures to be adopted.</li> <li>• <b>Air Quality Management Plan (AQMP):</b> The AQMP sets out the key requirements and best practice guidance for the control of air emissions during the construction phase, in particular measures to mitigate dust generation. It includes procedures for dust control, monitoring and corrective actions in response to complaints that may arise during the works.</li> <li>• <b>Land Contamination Management Plan (LCMP):</b> The LCMP sets out the key requirements and best practice guidance on the approach to identifying contaminated materials (where they exist) during construction and how they are to be dealt with.</li> <li>• <b>Water Management Plan (WMP):</b> The WMP sets out the key requirements and management guidance relating to the control of impacts to the water environment, in particular the control of drainage discharge rates, the prevention of soil erosion and sediment runoff and maintenance of the required standards of water quality.</li> <li>• <b>Waste Management Implementation Strategy (WMIS):</b> The WMIS (<b>Annex 5 of the Environmental Statement</b>) sets out the key requirements and provides guidance on how waste will be managed during the construction works.</li> <li>• <b>Written Scheme of Investigation (WSI):</b> The WSI sets out the programme of investigation to identify and record archaeological heritage artefacts and features prior to the construction works commencing.</li> <li>• <b>Environmental Incident Control Plan (EICP):</b> The EICP sets out the key requirements and management guidance in relation to environmental incidents. Specifically, it identifies: (i) the relevant sensitive environmental receptors; (ii) the risks posed to the identified sensitive receptors by the construction works; and (iii) and the mitigation and control measures to be implemented to manage environmental incidents effectively.</li> </ul>

Document level	Title of document	Description
4	<b>Construction Environmental Management Plans (CEMP)</b>	<b>CEMPs</b> will be produced by the contractor(s) as a deliverable under the terms of their contract, prior to work commencing. The <b>CEMPs</b> will respond to the requirements defined in the <b>EMMP</b> and <b>SSMPs</b> , together with other relevant information. The CEMP provides the specific details of practical day-to-day working controls which will be implemented. These details may include, where applicable, method statements and risk assessments from sub-contractors.
5	<b>Other Contractor Management Plans, Procedures and Work Instructions etc</b>	Other documents prepared as necessary to deliver environmental control. For example this may include a contractor's Site Waste Management Plan and Environmental Incident Response Plan within the scope of the contract.

### 1.3 Relationship between EMMP and SSMPs

1.3.1 **Plate 1.1** shows the relationship between the **EMMP** and the **SSMPs**.

Plate 1.1: Structure of the Management Plans



### 1.4 Environmental Management System

1.4.1 This EMMP will be a central element of the Environmental Management System (EMS) which is under development by EDF Energy for the HPC Project. EDF Energy intends that the EMS should be compliant with the requirements BS ISO 14001. The EMS will develop as the construction works progress.

## 2. ENVIRONMENTAL MANAGEMENT REQUIREMENTS

### 2.1 Introduction

2.1.1 This section describes the generic environmental management requirements that will be applied for the HPC Project, including the off-site associated developments.

2.1.2 In order for the proposed HPC Project to meet all environmental requirements throughout the project life-cycle, the management and control of environmental impacts needs to be considered at each phase, commencing with detailed design. This approach provides an opportunity to reduce mitigation and management costs in the long run by 'designing out' impacts where possible. It also ensures there is an appropriate level of environmental evaluation at each phase of the project.

### 2.2 Environmental Management during Design

2.2.1 Environmental design management ensures that environmental impacts are taken into account at the design stage. The design management processes will address in particular:

- establishment of environmental design aims;
- incorporation of environmental design requirements and commitments;
- identification of environmental aspects and impacts and the means of managing and mitigating these; and
- use of innovative design to meet environmental objectives and design aims and achieve overall improvements in environmental quality.

### 2.3 Environmental Management during Construction

2.3.1 Prior to the commencement of substantive construction activities, the contractor shall prepare a CEMP and submit this to EDF Energy for review and approval. The CEMP will be developed from the version provided at tender submission and will reflect the outcome of detailed design work where relevant. The CEMP will, as a minimum requirement, define the approaches to be taken to address all significant environmental aspects relevant to the work activities as identified in the ES and associated SSMPs. The CEMP shall be reviewed periodically and updated as necessary during the execution of the relevant works.

2.3.2 As a minimum, the CEMP shall define how:

- the contractor will comply with EDF Energy's Environmental Policy Statement (see **Sub-Appendix A1**), **Sustainability Statement** and other relevant environmental performance requirements;
- the contractor will comply with relevant legislation and other applicable requirements, including mitigation measures identified in the **Environmental**

**Statement** and conditions of environmental licences and permits, consents, leases, etc. as appropriate to the contract);

- the contractor will manage the work so as to meet the environmental requirements. This shall include roles and responsibilities and clear lines of communication;
- the contractor will set his/her own objectives and targets that will be aligned with EDF Energy's relevant objectives targets and Key Performance Indicators (KPIs) as appropriate (this to include a summary of the mechanism for data capture and reporting);
- formal environmental inspections and audits will be carried out, including their frequency and timing;
- site personnel will be made aware of their environmental responsibilities, including a training needs matrix, training programmes and modules for tool box talks. This shall include the provision of training for sub-contractors as appropriate to the nature and environmental risks of their work; and
- construction traffic will be managed in accord with EDF Energy's requirements.

2.3.3 Where applicable, the CEMP shall also describe how:

- complaints and other communications will be dealt with by the contractor in accordance with EDF Energy's procedures; and
- non-compliance and corrective actions will be addressed.

2.3.4 Where sub-contractors are to be used, the sub-contractors shall produce method statements, procedures and work instructions to ensure environmental performance in accordance with the CEMP as relevant to the sub-contractor's scope of work.

#### a) Environmental Impacts

2.3.5 The EMMP is based upon those environmental impacts that have been evaluated within the **Environmental Statement** as potentially significant. The contractor shall demonstrate through the CEMP and any other associated plans how these environmental impacts will be controlled throughout the duration of the work.

#### b) Environmental Legislation, Regulation and Other Requirements

2.3.6 The contractor shall carry out the works in compliance with the requirements of UK environmental law. The contractor shall also comply at all times with any other mandatory requirements, including those specified by the planning, highways and environmental health authorities, or by any other relevant statutory agency. An indicative list of relevant legislation is included in **Sub-Appendix A2**.

#### c) Environmental Objectives and Targets

2.3.7 The contractor shall develop environmental objectives and targets appropriate to its scope of work that shall, as a minimum, address the potentially significant environmental impacts identified in the **Environmental Statement** and SSMPs. These shall be consistent with EDF Energy's environmental and sustainability objectives set out in the **Sustainability Statement**.

**d) Schedule**

2.3.8 The contractor will be required to prepare and maintain an appropriately detailed implementation schedule for the CEMP. This shall be submitted to EDF Energy at the same time as the CEMP. EDF Energy will monitor and review the progress of the contractor against this schedule. As a minimum the schedule shall include:

- identification of the key stages of CEMP implementation;
- tasks to be completed by each stage;
- responsibilities assigned to the contractor's personnel (and any sub-contractors) for timely completion of the key tasks at each stage; and
- the programme for monitoring, reviewing and auditing all aspects of the work which may affect the environment.

**e) Method Statements**

2.3.9 At an agreed time prior to the commencement of work on-site, the contractor shall prepare one or more method statements specifying how the CEMP is to be implemented. This will provide detail in respect of specific tasks or work elements at specific site locations. The method statements shall be submitted to EDF Energy for approval.

**f) Internal Communications: Meetings and Reviews**

2.3.10 As part of the CEMP, the contractor will develop a programme for effective communication and reporting with EDF Energy on environmental matters.

**g) External Communications: Incident Reporting**

2.3.11 No direct external communication with stakeholders will be undertaken by contractors working on site. All external communication for the project will be managed by EDF Energy.

**h) Auditing, Monitoring, Reporting and Corrective Action**

2.3.12 In accordance with the CEMP and the implementation schedule:

- Auditing and Monitoring Programme: EDF Energy and its contractor(s) will agree a programme for monitoring, inspection, auditing and reporting on each element of the proposed works relevant to environmental management and performance.
- Inspections: The contractor shall undertake regular worksite inspections to ensure that all environmental requirements are complied with. The frequency of these inspections shall be agreed with EDF Energy and should be appropriate to the significance of the works in relation to their impact upon the environment. These inspections shall be included in the monitoring, reporting and auditing programme.
- Performance Reporting: The contractor shall submit environmental performance reports at a frequency to be agreed with EDF Energy. The proposed structure of the report shall be submitted to and approved by EDF Energy prior to commencement of the work.

**i) Records**

- 2.3.13 As work progresses, records shall be generated that will constitute evidence of the implementation of environmental management measures and compliance with environmental performance requirements. These shall be retained for future reference and in accordance with legal requirements.