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APPENDICES

None

4 Outline of Environment Management Plan

4.1 Introduction and Background to the Project

Purpose of the report

- 4.1.1 This document is an outline of the approach that will be undertaken for the development and format of the Environmental Management Plan (EMP) for the project. This document, herein referred to as 'EMP outline' has been prepared in accordance with the *Design Manual for Roads and Bridges (DMRB) LA 120 Environmental Management Plans*, Revision 1 March 2020 (Highways England, 2020a)¹.
- 4.1.2 Environmental Management Plans are iterative and evolve and become more detailed commensurately with the level of available detailed design, construction methodology, environmental assessment and progress of a project as it is constructed and then operated.
- 4.1.3 The purpose of the EMP will be to provide clear and concise information which states how the mitigation and management of environmental effects identified in the Environmental Statement (ES) will be delivered and maintained. A draft EMP will be submitted with the application for Development Consent Order (DCO). The EMP will be a 'live' document which continues to evolve throughout construction. Upon completion of the construction of the scheme the EMP will go through a further iteration to inform handover and will set out the environmental requirements that must be implemented during the operation and maintenance of the road.
- 4.1.4 The draft EMP to be submitted with the DCO will set out the measures, commitments and actions needed to manage and mitigate environmental effects identified within the ES during construction and operation of the project. The overall objectives of the EMP are:
- To minimise the risk of any type of pollution incident or other form of unauthorised discharge
 - To avoid or minimise impacts to nearby receptors
 - To be compliant with statutory legislation
 - To provide a framework for the future implementation and review of the EMP during construction and operation of the project, as well as any other relevant documents.

The project

- 4.1.5 See PEI Report Chapter 2: The Project for a description of the project. Figure 1-1: A66 Location and Overview Plan in the main PEI Report shows the project location. This section of the EMP will set out details of the project that are important in relation to the environmental management functions.

Programme

- 4.1.6 Construction is expected to start in 2024 and the project is expected to be open to traffic in 2029. The project is likely to be delivered in a phased approach, with the construction of schemes delivered in parallel or consecutively. The overall approach

¹ Highways England (2020a) Environmental Management Plans LA 120, available at: <https://www.standardsforhighways.co.uk/prod/attachments/a3a99422-41d4-4ca1-bd9e-eb89063c7134?inline=true> [accessed January 2021]

to construction and detailed planning will develop after statutory consultation. The DCO submission will set out the expected duration of construction for each scheme and package, and an indication of the likely overall programming for construction.

- 4.1.7 A detailed construction programme will then be finalised by the contractor(s) in advance of the works. This section of the EMP will set out further detail about the proposed construction programme and how it is to be delivered.

Project objectives

- 4.1.8 Highways England has been appointed by the Secretary of State (SoS) to be the highway authority, traffic authority and street authority for the *Strategic Road Network* (SRN) (Highways England, 2017)². As such Highways England has set the objectives for the project which are presented by theme in Table 4-1: A66 project objectives.

Table 4-1: A66 project objectives

Theme	Project Objectives
Economic	Regional: Support the economic growth objectives of the Northern Powerhouse agenda.
	Ensure the improvement and long-term development of the SRN through providing better national connectivity including freight.
	Maintain and improve access for tourism served by the A66.
	Seek to improve access to services and jobs for local road users and the local community.
Transport	Improve road safety, during construction, operation and maintenance for all, including road users, Non-Motorised Users (NMU), road workers and local residents.
	Improve journey time reliability for road users.
	Improve and promote the A66 as a strategic connection for all traffic.
	Improve the resilience of the route to the impact of events such as incidents, roadworks and severe weather events.
	Seek to improve NMU provision along the route.
Community	Reduce the impact of the route on severance for local communities.
Environment	Minimise adverse impacts on the environment and where possible optimise environmental improvement opportunities.

- 4.1.9 Section 4 ‘*Aims and Objectives*’ of ‘*Highways England: Licence*’ (Highways England, 2015a)³ states that Highways England has a duty to “*minimise the environmental impacts of operating, maintaining and improving its network and seek to protect and enhance the quality of the surrounding environment*’ and ‘*conform to the principles of sustainable development*”. The EMP will develop over the lifetime of the project in the context of this duty.

² Highways England (2017) Strategic Road Network Initial Report, available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/666857/Strategic_Road_Network_Initial_Report_Overview.pdf [accessed January 2021]

³ Highways England (2015a) Highways England: Licence, available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/431389/strategic-highways-licence.pdf [accessed February 2021]

Pre-commencement requirements and post-consent determinations

- 4.1.10 The project now forms part of UK Government's 'Project Speed', which aims to bring forward proposals to deliver public investment projects more strategically and efficiently. Project Speed aims to ensure that the right things are built better and the benefits realised sooner.
- 4.1.11 The A66 project is one of a number of high-profile 'pathfinder projects' to identify reforms which could speed up and improve delivery across the UK Government's infrastructure portfolio.
- 4.1.12 One aspect of the consenting regime that is under consideration for innovation to facilitate a more efficient and streamlined process is the approach to consultation on, and determination of, pre-commencement requirements (PCRs) and other post consent determinations. These would normally be set out in the DCO, and each requirement would need to be discharged, usually through gaining approval of the Secretary of State before construction can commence on site. In this traditional approach, the EMP (often referred to in DCO requirements as a Construction Environmental Management Plan) would be a requirement, to be developed in detail by the contractor(s) and submitted for appropriate approvals, based on the less detailed draft EMP submitted with the application to set the framework for environmental management.
- 4.1.13 The Project is exploring, including in discussion with consultees and regulators, different ways that the DCO could be drafted to facilitate Project Speed and deliver its objectives. Approaches which are being considered (in isolation or in combination, where appropriate) include (i) seeking to incorporate the EMP approval within the decision to grant the DCO, to avoid or reduce the need for subsequent determinations after the grant of development consent (i.e. the EMP would be secured as part of the DCO and not require further approval); (ii) incorporating the "standard" pre-commencement requirements typically included in Highways England's DCOs into the EMP process and (iii) in relation to any subsequent determinations required after the grant of development consent, establishing a process that would enable those determinations to be made transparently by an independent and functionally separate unit within Highways England (instead of by the Secretary of State). Each of these approaches is discussed in more detail in the following sections.

Detailed EMP approval as part of the decision to grant the DCO

- 4.1.14 This approach would see Highways England bring forward a more detailed EMP (equivalent level of detail that would usually be produced following the granting of the DCO, at the pre-commencement stage) at the application and examination stages which sets out in detail in the environmental management measures proposed, rather than a less detailed draft EMP which establishes a framework for the resolution of the detailed environmental management measures.
- 4.1.15 This approach would enable the detailed environmental management measures to be considered in the examination of the project and, if the DCO is granted, those detailed measures would become 'certified' documents, removing the need for a subsequent post-consent process.
- 4.1.16 It is acknowledged that for this approach to be successful a greater level of detailed information would be required in relation to matters such as the design and proposed construction methodologies. It is hoped that early contractor involvement would facilitate bringing forward this information at the application/examination stage rather

than to hold it over until after the grant of consent. Nonetheless, there may still be some aspects of the Project where, despite early contractor involvement, it may not be practicable to bring forward a fully detailed EMP. As such Highways England is considering this approach being utilised at both a whole Project level, and/or in relation to specific geographical parts of the of the Project, and/or or in relation to specific temporal phases of construction, for example, in relation to preliminary or early works.

4.1.17 If this hybrid approach is adopted it will be important to clearly delineate those parts of the Project that would be subject to a more detailed EMP approach, whereby the EMP would be approved with the decision to grant the DCO and those parts that would be subject to an less detailed, draft EMP approach, where there would remain matters that would require finalisation after the grant of the DCO.

Incorporating the ‘standard’ requirements within the EMP process

4.1.18 Many of Highways England’s DCOs include ‘standard’ requirements, some of which are required to be discharged prior to the commencement of the authorised development (pre-commencement requirements or PCRs). In general terms these ‘standard requirements’ are well understood by frequent participants in the DCO process and there is an opportunity to streamline the process by incorporating their subject matter within the EMP. This streamlining would be advantageous to participants in the consenting and implementation processes as it offers opportunities to:

- consolidate environmental controls into one document; and
- aid understanding and participation by enabling controls, processes and procedures to be expressed through a more engaging and user friendly way than is possible within the constraints of the statutory instrument drafting conventions that would apply to requirements.

4.1.19 Table 4-2: Outlines some of the ‘standard’ requirements that might be included in the EMP process and summarises how they might be delivered through a more detailed or less detailed EMP at DCO application approach.

Table 4-2: Which ‘standard’ requirements might be included in the EMP process

Type of requirement	Typical Obligations of the requirement	Project approach to ‘standard’ requirement
Detailed Design	To consult relevant stakeholders on departures from the design shown on the relevant certified plans that would not lead to materially different environmental effects and to obtain the approval of the SoS for such departures.	It is proposed to retain this requirement. Where there remain important design decisions to be taken after the grant of development consent it is proposed that the process for consultation on, and determination of those decisions would be set out in the EMP, consistent with the approach set out in the proposed determination process section below.

Type of requirement	Typical Obligations of the requirement	Project approach to 'standard' requirement
Construction Env Mgt Plan (CEMP)	To consult on a CEMP with relevant stakeholders, and submission and approval of CEMP by SoS	<p>It is proposed to retain the elements of this requirement that are necessary to ensure that there is compliance with the EMP, whether it is in the form of a more or less detailed EMP at submission.</p> <p>Under an approach where a more detailed EMP is submitted with the DCO application (for parts, or possibly all of the Project), the EMP would be submitted in draft with the DCO application and may need revision and updates during the Examination as a result of the examination process. The EMP would have been discussed with the LPAs and relevant bodies during the pre-application stage. A consultation and decision process will be set out in the EMP for any proposed changes to the EMP arising after the grant of the DCO.</p> <p>In the scenario where, despite the greater level of detail contained in the EMP there remains matters that are not capable of being finalised before the examination closes the EMP would include provisions for consultation on, and determination of, those matters.</p> <p>Under a less detailed draft EMP approach the draft EMP would set out a clear framework for the matters held over for a determination following the grant of development consent and would include provisions for the consultation on, and determination of, those matters.</p>
Protected Species	Pre-construction survey work to establish whether any protected species are (likely to be) present/affected; consultation on establishment and management of mitigation; SoS approval of mitigation details should final pre-	<p>This obligation will form part of the EMP, requiring the surveys to be undertaken (with the findings consulted on with the Natural England, the relevant LPA and any other relevant parties), as a first phase of any construction works.</p> <p>Should the surveys reveal evidence of the presence of protected species the EMP would include provisions for consultation on, and determination of, the appropriate measures to safely manage risks to those protected species.</p>

Type of requirement	Typical Obligations of the requirement	Project approach to 'standard' requirement
	<p>construction surveys identify the presence of protected species.</p>	<p>The DCO would not affect the need, where it applies, to obtain protective species licences.</p>
<p>Surface and foul water drainage</p>	<p>To consult on written details of the surface and foul water drainage system with approval by SoS.</p>	<p>This obligation will form part of the EMP, which would include provisions for consultation with the relevant LPAs, drainage authorities and EA on, and determination of, the detailed design of surface and (if relevant) foul water drainage.</p> <p>Where elements of the drainage scheme are not capable of being finalised before the end of the examination or where amendments to the certified written scheme of investigation are proposed after the grant of development consent, the EMP would, if required provide for a process of consultation on and determination of those elements or amendments.</p> <p>This process would be without prejudice to the Environment Agency's functions to regulate 'flood risk' activities in relation to main rivers under the Environmental Permitting (England and Wales) Regulations 2016, or the functions of drainage authorities in relation to ordinary watercourses. It is anticipated that these matters would be incorporated within the DCO and preserved through the use of Protective Provisions.</p>
<p>Archaeological assets</p>	<p>To consult on the written scheme for investigation of areas (or equivalent differently worded documents) of archaeological interest and secure the SoS's written approval</p>	<p>This obligation will form part of the EMP process.</p> <p>Under a more detailed EMP at submission approach the written scheme of archaeological investigation would be submitted with the DCO application in draft and would be finalised at the end of the examination, allowing it to be approved at the same time as the DCO without requiring further determinations.</p> <p>Where elements of the written scheme of investigation are not capable of being finalised before the end of the examination or where amendments to the certified written scheme of investigation are proposed after the grant of development consent; the EMP (construction) would provide for a process of consultation on</p>

Type of requirement	Typical Obligations of the requirement	Project approach to 'standard' requirement
		<p>and determination of those elements or amendments.</p> <p>Under a less detailed, draft EMP at submission approach, the EMP would, if required, set out the obligation to prepare a written scheme of investigation and would include provisions for consultation with the relevant heritage stakeholders, and determination of, the written scheme of investigation.</p>
Traffic Management	Consult the LPA or Highways Authority on the traffic management plan (TMP) and secure the SoS's written approval	<p>Under a more detailed EMP at submission approach, early contractor involvement will allow a draft traffic management plan to be included with the EMP which would be finalised by the end of the examination, allowing it to be approved as part of the decision on the DCO.</p> <p>Where elements of the traffic management plan are not capable of being finalised before the end of the examination or where amendments to the certified TMP are proposed the EMP would provide for a process of consultation on and determination of those elements or amendments.</p> <p>Under a less detailed, draft EMP at submission approach, the EMP would, if required include the obligation to prepare a TMP and would include provisions for consultation with the relevant heritage stakeholders, and determination of, the written scheme of investigation.</p>
Landscaping	Consultation with relevant stakeholders on a written landscaping scheme and secure the SoS's written approval	<p>Under a more detailed EMP at submission approach, early contractor involvement may allow a draft landscaping scheme to be included with the EMP which would be finalised by the end of the examination, allowing it to be approved as part of the decision on the DCO.</p> <p>Where elements of the draft landscaping scheme are not capable of being finalised before the end of the examination or where amendments to the certified scheme are proposed the EMP would provide for a process of consultation on and determination of those elements or amendments.</p>

Type of requirement	Typical Obligations of the requirement	Project approach to 'standard' requirement
		Under a less detailed, draft EMP at submission approach, the EMP would, if required set out the obligation to prepare a landscaping scheme and would include provisions for consultation with the relevant heritage stakeholders, and determination of, the written scheme of investigation.
Land and groundwater contamination	Duty to carry out a risk assessment, and consult on that risk assessment, where unexpected contamination is encountered during construction. Where remediation is appropriate, a duty to consult on, and obtain the Secretary of State's approval of, that remediation strategy.	The EMP would incorporate obligations to carry out and consult on risk assessments where unexpected contamination is encountered and where remediation is appropriate, will include provisions for consultation on, and determination of, a remediation strategy.

Proposed post-consent determination process

- 4.1.20 Highways England as the strategic highway authority for England and the body that publishes and maintains the Design Manual for Roads and Bridges, the cornerstone of environmental assessment for highways schemes, and publishes the national (UK wide) design standards for fast moving roads and supporting advice notes, has unrivalled expertise in the assessment, design, operation and maintenance of England's strategic road network.
- 4.1.21 As part of the consideration of approaches to post consent determinations (including PCRs), Highways England is contemplating establishing a process where post consent determinations are made by a functionally separate unit within Highways England that is independent from the project, rather than by third parties such as the Secretary of State.
- 4.1.22 It is acknowledged that one of the purposes of third party approval for DCO requirements is to provide confidence of an independent determination process.
- 4.1.23 Highways England is structured to ensure there is sufficient oversight of the work that project teams and appointed contractors are undertaking. The intention would be that the Safety, Engineering and Standards ('SES') function within Highways England, sitting separately from the project teams, would independently review any submissions for approvals in line with an agreed and transparent process. The SES would provide advice prior to any formal determinations being made by Highways England, providing a clear and transparent separation of functions between the project team and the 'determining' team.

- 4.1.24 This will reflect Highways England's duties under Regulation 32 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, which requires authorities to act in a objective manner and to have appropriate administrative arrangements in place where they deal with subsequent consents for a project that has gone through the EIA process.
- 4.1.25 It will also mirror the approach taken for local authority promoted highway schemes which do not meet the thresholds for nationally significant projects. In these cases local authorities are required to implement a functional separation between the 'promoting' and 'determining' functions of the local authority, but both functions sit within that authority corporately.
- 4.1.26 Highways England is bound by its statutory duties and obligations, including the statutory duty under section 5 of the Infrastructure Act 2015⁴ to have regard to the effect of the exercise of its functions on the environment; and section 6, to take account of the April 2015 Highways England Licence⁵ issued by the Secretary of State, which at paragraph 5.23 requires Highways England as Licence Holder to have regard to the environment including, amongst other things, that protecting and enhancing the environment is considered at all levels of operations; and to ensure the best practicable outcomes across its activities.
- 4.1.27 If this proposed approach is adopted within the DCO application, a protocol document will be submitted with the DCO application setting out the exact process of consultation with relevant stakeholders and how post consent applications would be determined to ensure that the certification or 'approval' of information produced subsequent to the DCO being granted is undertaken in an appropriate, independent manner with full regard to legal obligations and consultee comments.
- 4.1.28 This document will be based on the following principles:
- A requirement for Highways England to provide 'Consultation Material' to the third parties identified in the certified EMP (construction) for the relevant document to be produced and as relevant to the statutory functions of the parties identified
 - A specified consultation duration
 - A requirement (reflecting the existing legal requirement) for Highways England and its contractor to have regard to the comments received
 - A requirement for the contractor to submit to Highways England a report setting out their response to the comments made and how they have been taken into account, any revised Consultation Material

Structure of this document

- 4.1.29 The remainder of this document will be structured as follows:
- **Section 2: Roles and responsibilities.** This section will define the roles which a contractor will identify within the EMP, in order to deliver the environmental commitments.
 - **Section 3: Record of Environmental Actions and Commitments (REAC).** This section will identify the environmental commitments to address the potential

⁴ Infrastructure Act 2015, available at: <https://www.legislation.gov.uk/ukpga/2015/7/contents/enacted/data.htm> [Accessed 09 September 2021]

⁵ Department for Transport (2015a) *Highways England: Licence*, available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/431389/strategic-highways-licence.pdf [Accessed 10 August 2021]

environmental effects of the works, including commitments to certain key items of embedded mitigation.

- **Section 4: Consents and permissions.** This section will specify the consents and permissions that are required for the project, the relevant provisions included within the DCO related to these matters and any specified conditions of those permissions.
- **Section 5: Environmental asset data and as built drawings.** This section will set out what information is to be collected during the project phases and how it will be stored and transferred
- **Section 6: Details of maintenance and EMP monitoring activities.** This section will set out required monitoring and maintenance activities
- **Section 7: Induction, training and briefing procedures for staff.** This section will describe the specific induction activities, training and briefing procedures in relation to environmental management throughout the construction (and if relevant, later) phase(s).
- **Section 8: References and glossary.**
- **Section 9: Annexes.** These will include (but not be limited to) a constraints map (or maps), relevant management plans, environmental method statements, emergency procedures and record of any environmental incidents, copy of evaluation of change register and final environmental investigation and monitoring reports.

4.2 Roles and Responsibilities

Roles and organisations involved in the delivery of the Environmental Management Plan

- 4.2.1 Highways England or the Project Management Consultant appointed by Highways England will be responsible for overseeing management of the project. Some of the site supervision roles such as the Engineering Clerk of Works and procurement specialist consultants to supervise, monitor or check the Principal Contractor (PC) method statements, including sensitive activities, will be delegated where required by Highways England.
- 4.2.2 The PC(s) is the contractor (or contractors, if the project is delivered as more than one package of works) with control over the construction phase of a project involving more than one contractor. They are appointed in writing by the client to plan, manage, monitor and coordinate health and safety during this phase. The PC(s) will be required to delegate responsibilities to experienced onsite personnel within the key areas of the site. The delegation of responsibilities will be clearly identified within relevant project documents and site files. Highways England is currently considering its approach to how many PCs will be appointed for the purposes of the Project.
- 4.2.3 The key project roles envisaged at this stage for Highways England and the PC(s) will be listed in Table 4-3: Contact details for key project role and organisations involved in the delivery of the EMP. These will be reviewed and agreed in subsequent stages and any further required roles will be identified. Individual names and contact details will be confirmed and inserted in the EMP where applicable by Highways England and the PC(s) prior to the commencement of construction. This section of the EMP will also include competent expert statements demonstrating that the names identified for each of the roles has the appropriate experience and expertise to undertake that role.

Table 4-3: Contact details for key project role and organisations involved in the delivery of the EMP

Role	Name	Email	Phone
Highways England Project Manager			
PC Project Manager			
PC Environment Manager			
PC Ecological Clerk of Works			
PC Archaeological Clerk of Works			
Contractor Community Relations Manager			
Other Environmental Specialist(s), if applicable			

4.3 Environmental Management Responsibilities

- 4.3.1 This section of the EMP will set out the specific environmental responsibilities for each of the roles identified in Table 4-3 above (and any additional ones later identified to be required). This will be a comprehensive list of responsibilities, ensuring no gaps and clear accountability for each role.
- 4.3.2 The process for delegation of responsibility will be clearly identified. The contractor shall establish a management structure that includes an organisational chart encompassing all staff responsible for delivery of environmental mitigation measures and shall include this chart within the EMP.

Table 4-4: Roles and responsibilities during construction

Role	Responsibility

4.4 Record of Environmental Actions and Commitments

Introduction

- 4.4.1 The Record of Environmental Actions and Commitments (REAC) in Table 4-6: REAC tables, will identify the environmental commitments proposed to address the potential environmental effects of the Project. These tables will be first completed once the ES is completed to set out the specific management and control measures that are relied upon within the assessment. The table will also reflect the position reached on the PCR process, as discussed above.
- 4.4.2 The REAC tables will be updated by the PC(s) when preparing (where necessary) the EMP relevant to their scope of works. Each EMP or update will be prepared in accordance with the principles of the original EMP and will require approval from Highways England.
- 4.4.3 The final version of the EMP at the end of each construction phase will be subject to further iteration by the PC to set out the specific requirements of handover, operation and maintenance. Once all construction phases are complete an end of construction version of the EMP will be produced, which will then be the main document containing essential environmental information passed to Highways England and (if different) to

the maintenance authority responsible for the future maintenance of the relevant parts of the project once operational.

Guide to the REAC table(s)

4.4.4 The table(s) will not define general legislative requirements. It will be assumed that, in addition to compliance with the measures that will be set out in this table, all activities will comply with applicable legislation.

4.4.5 Table 4-5: Explanatory guide to REAC table, provides a summary of the purpose of, and what will be included in, each column within the REAC table.

Table 4-5: Explanatory guide to REAC table

Column	Explanation
Reference	A unique identifier defined within the REAC tables to enable simple reference to individual measures.
Source Reference	An identifier which is directly relevant to the action or commitment, for example a source such as a mitigation reference in the ES.
Action/commitment	The action that is required is defined, including any assumptions on which the action is based. The location for the action is project wide, unless otherwise stated. Any monitoring that is required in relation to the action is defined.
Objective	The objective of the action, including reference to relevant legislation requirements
Implementation	How the action is to be implemented, including details of risk management
Responsible person(s)	The person or body responsible for delivery of the action; this will often be the contractor.
Achievement criteria	The criteria which define the successful implementation of the action, such as a document approval which confirms the action has been undertaken.
Implementation Date	Anticipated project stage, date of implementation or achievement
Sign-off	Column for signature of responsible person to indicate commitment has been implemented

4.4.6 In order to provide for future flexibility, unless otherwise stated the REAC tables will not typically define how the action is to be implemented or achieved, and do not consider the risk management of individual items, unless these elements are implicit within the action.

4.4.7 The references to guidance documents within the REAC tables will not be intended to be exhaustive and in preparing the EMP and related topic-specific plans the contractor will be required to make reference to all relevant technical guidance in individual subject areas as appropriate.

REAC tables

Table 4-6: REAC table framework

Ref	Source Reference	Action/commitment	Objective	Implementation	Responsible person(s)	Achievement Criteria	Implementation Date	Sign Off
General Provisions								
Sections below for each topic, linked to ES chapters								

4.5 Consents and Permissions

- 4.5.1 It is intended that a number of other consents and permissions (outside the DCO itself) will be disappplied by the DCO and replaced either by the drafting of the DCO, relevant Protective Provisions for certain parties within the DCO, or the plans to be produced pursuant to the EMP.
- 4.5.2 There may be consents and licences, however, particularly those that are required for specific aspects of the project that are not known in sufficient detail at the time of the DCO decision (e.g. those that are specific duration or time dependent) where consents will be need to be obtained separately. Once the detailed design is finalised, further assessment and consultation with regulating bodies is required to ascertain the specific need for additional project consents, licences and permissions.
- 4.5.3 As the DCO allows for a single consenting process, a strategy for the project is currently being developed to address which consents would be included wihtin the DCO and which would be sought through other existing regimes, if required. At the time of writing possible consents, licences and permissions for the project may include:
- Common land consent
 - Protected species licences
 - Consent to carry out street works and to stop up highways permanently or temporarily
 - Consent to stop and divert public and private rights of way
 - Consent to erect any temporary or permanent structure in, over or under a main river
 - Consent to affect the flow of water or cross-sectional area of an ordinary watercourses
 - Consents required under Water Resources Act 1991 and Land Drainage Act 1991 byelaws
 - Realignment of Award Drains (ensuring that the 'Enclosure Acts' still have effect in respect of maintenance of these Award Drains)
 - Consent to remove buried human remains
 - Consent to abstract water
 - Consent to discharge to sewers
 - Consent to discharge to other watercourses subject to the requirement, where applicable, to obtain an environmental permit for a "water discharge activity" under the Environmental Permitting (England and Wales) Regulations 2016
 - Relevant waste licensing or exemptions
 - Noise: Control of Pollution Act Section 61 Consent.

4.6 Environmental Asset Data and As-Built Drawings

- 4.6.1 This section will set out the asset data created or collected for the project and how it will align to Highways England Asset Data Management Manual (ADMM) Parts 1 to 46789.
- 4.6.2 Environmental data is categorised as either Environmental Inventory or Environmental Management Information which together provide key detail on the composition of the soft estate, what condition those assets are in and how they should be managed.
- 4.6.3 Environmental Management Information (EMI) is specific data attached to individual assets and assists in informing Highway England and their contractors of the broad environmental management requirements of the strategic road network, and corresponding environmental performance.
- 4.6.4 This section of the EMP will specify the format, frequency and method of submission of environmental asset data in order to inform Highways England Environmental Information System (EnvIS).

4.7 Details of Maintenance and EMP Monitoring Activities

- 4.7.1 This section of the EMP will set out the systems of recording and inspections that will be required to maintain an audit trail of the environmental obligations of the scheme. As submitted with the DCO, it will include a table of all monitoring requirements identified in the ES, including details of the purpose of the monitoring, frequency and methodology. As it progresses through subsequent iterations it will also include details of monitoring required through construction, monitoring of compliance with the EMP and maintenance requirements for handover and operational phases.

Environmental records inspections

- 4.7.2 The EMP will set out specific requirements for the contractor's inspection and compliance procedures, including alignment with recognised quality and environmental management standards.
- 4.7.3 Records of compliance with the requirements of the EMP, derived from audits and other inspections, will be held at the Principal Contractor's site office. These will be available for inspection by representatives of any audit team and relevant statutory body such as local authorities or the Environment Agency, in their statutory role. The Principal Contractor's Quality Administrator will ensure there is a central filing system in place for any checklists, reports and monitoring consistent with the EMS.

Procedures to monitor compliance

- 4.7.4 The EMP will include specification of the procedures for monitoring compliance with the actions/commitments set out REAC, and the administrative process for documenting compliance. This will include environmental audit processes, and the

⁶ Highways England (2020b) Asset Data Management Manual Part 1 – Data Principles and Governance. Available at: <https://www.standardsforhighways.co.uk/ha/standards/admm/>

⁷ Highways England (2020c) Asset Data Management Manual Part 2 – Requirements and Additional Information. Available at: <https://www.standardsforhighways.co.uk/ha/standards/admm/>

⁸ Highways England (2020d) Asset Data Management Manual Part 3 - Data Dictionary. Available at: <https://www.standardsforhighways.co.uk/ha/standards/admm/>

⁹ Highways England (2020e) Asset Data Management Manual Part 4 - Asset Inventory Selector. Available at: <https://www.standardsforhighways.co.uk/ha/standards/admm/>

environmental objectives to be included in specific control documents required to be implemented including Contractor Risk Assessments, method statements and COSHH forms.

- 4.7.5 This section will also set out clearly the procedures to be followed in the event that non-compliance is recorded, including corrective action and reporting procedures.

4.8 Induction, Training and Briefing Procedures for Staff

Induction and training

- 4.8.1 This section of the EMP will set out the environmental-specific induction processes that will be implemented by the PC(s) including site specific training or toolbox talks led by the PC(s) or environmental specialists. It will also set out training required for all personnel on the site, whether full time staff, subcontractors or visitors.
- 4.8.2 Specific training needs will be identified and provided for all personnel involved in work activities that could result in adverse impacts on the environment. Training will include reference to the importance of adhering to the contents of the EMP and the potential consequences of departure from specified method statements. Environmental training in the form of toolbox talks will also be undertaken on site, evidence of which would be maintained on record as part of the EMS.
- 4.8.3 The EMP submitted with the DCO will set out an indicative list of induction and toolbox talks training required for the project, bespoke to the environmental setting that the project will be constructed within.

Environmental competencies

- 4.8.4 The contractor will ensure all personnel conducting environmental tasks are suitably qualified and/or experienced for the roles and responsibilities that they are employed to undertake.
- 4.8.5 The contractor will monitor and record that all staff have attended the relevant environmental induction or training listed above (including updated or new training) prior to undertaking any activities on site.
- 4.8.6 The contractor's Environmental Manager onsite will be required to review and highlight requirements for additional training, as the project progresses, to improve and add value to the overall site environmental awareness and compliance. Additional training or induction issues would be identified from the regular site environmental check reports, or site feedback on any noted non-compliance. It is a requirement for the site to maintain a high standard of environmental management, implementing requirements in the EMP and other plans, EMS and associated best practice guidance, and reduce risks that could negatively impact on the environment.
- 4.8.7 The EMP will also set out criteria that the contractor shall apply to evaluate the effectiveness of environmental training throughout the duration of the construction phase.