

APPENDIX A – CB0192 – 1002 - CEMP



WESTERN ISLES REMEDIAL CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

BMC Ref: CB0192-1002

22nd April 2020

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Amendment Register

Revision	Date	Issued by	Approved by	Amendments
Rev 1.0	20/04/2020	Suzanne Grimes	Martin Black	
Rev 2.0	01/06/2020	Suzanne Grimes	Matt Hart	

Abbreviations

Abbreviation	Definition
BMC	Briggs Marine Contractors – Principal Contractor
ECoW	Environmental Clerk of Works
EIA	Environmental Impact Assessment
MHWS	Mean High Water Spring
MLWS	Mean Low Water Spring
NNR	National Nature Reserves
PAC	Pre-Application Consultation
SAC	Special Area of Conservation
SEPA	Scottish Environmental Protection Agency
SFF	Scottish Fishermen’s Federation
SHEPD	Scottish Hydro Electric Power Distribution
SNH	Scottish National Heritage
SPA	Special Protection Area
SPP	Scottish Planning Policy
SSEN	Scottish & Southern Energy Networks - Client and Principle Designer
SSSI	Site of Special Scientific Interest
RAMSAR	Wetland site designated of international importance under the Ramsar Convention
WFD	Water Framework Directive

1. OVERVIEW

1.1 Introduction

This Construction Environmental Management Plan (CEMP) has been prepared by Briggs Marine Contractors (BMC) on behalf of Scottish Hydro Electric Power Distribution plc (SHEPD). During routine inspections by SHEPD, essential maintenance works were identified to ensure a secure, safe supply of electricity to the islands and ensure the safety of the public when using the beaches. BMC have been contracted to carry out these works.

The proposed locations are:

Eriskay

1a – Eriskay to Barra (Eriskay shore end) out of service subsea power cable

1b – Eriskay to Barra (Eriskay shore end) in-service subsea power cable

Benbecula

2a – Benbecula to North Uist subsea power cable (both landfalls)

2b – Benbecula to South Uist West subsea power cable (both landfalls)

This plan details project specific construction and environmental management measures in respect of works associated with maintenance work on the exposed electricity cable at the shoreline locations. Figure 1 outlines the overall locations within the Western Isles, and Figure 2, shows the working corridors proposed within the marine licence application.

1.1.1 - Scotland's Marine Plan

Scotland's National Marine Plan is a framework for maritime spatial planning and aims to promote the sustainable development of marine areas, resources, and users.

The proposed project consists of maintenance work on existing electricity cables (shore-end): requiring manual placement of iron shells along the exposed cables for their protection on a small section of the foreshores on Eriskay (1b) and Benbecula landfall - North Uist landfall (2a). Eriskay (1b) requires further protection in the placement of a max. 10 rock bags above high water, placed on the sand. There may be a possibility of a removal of one 2T rock bag at the North Uist landfall (2a). There is a requirement to partially remove 60m of disconnected subsea cable on Eriskay (1a) from low water to shore and reburial of sections of exposed cable on the Benbecula - South Uist cable route at low water.

The works will have little effect in relation to landscape or seascapes as it is a minor change in the visual aspects of an existing exposed piece of infrastructure. There are also no marine noise effects associated with the proposed works. Due to the scale of the proposed works and the very limited nature of the effects on the marine environment from placing a number of iron shells onto the foreshore, placement of rock bags above high water, reburial of an exposed cable that dries out and partially removing a disconnected subsea cable from low water to shore, it was concluded that further consideration of the policies within the National Marine Plan were not necessary.

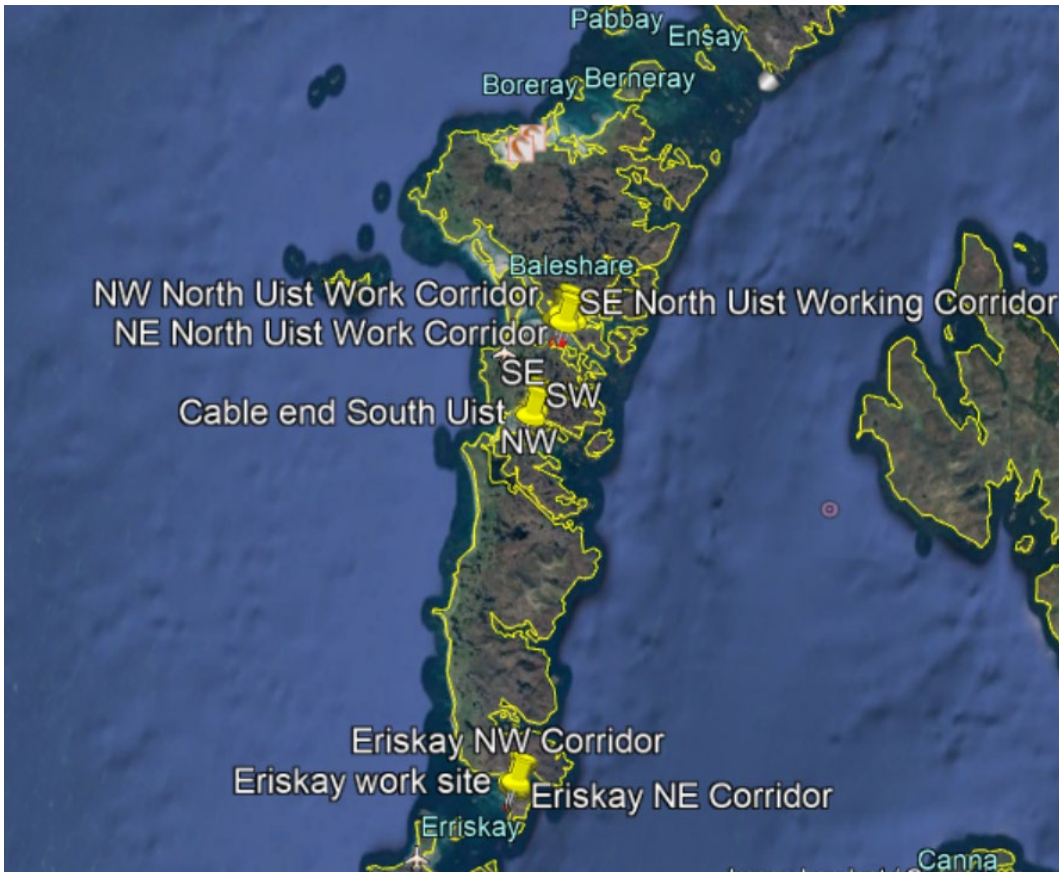


Figure 1- Proposed site locations



Figure 2- Proposed working corridors at Benbecula –South Uist West, Benbecula - North Uist and Eriskay

This CEMP provides information and guidance on the following topics:

- Waste Management;
- Air Quality;
- Water Quality Protection and Pollution Prevention;
- Soil Management;
- Ecology;
- Cultural and Heritage; and
- Emergency Procedures.

This document also provides further detail and control measures, and include:

- Otter control measures
- Breeding Bird Control measures

This CEMP is a live document that will be reviewed at regular intervals by Briggs onsite environment team and WSP Environmental Clerk of Works (ECoW) to reflect the progress of works, any changes in environmental requirements and to account for any emerging best practice or updates (from either statutory bodies or client/contractor best practice).

1.2. Project Description

1.2.1. Overview

The proposed project will see cable repairs at three sites, Eriskay 1b, Benbecula – North Uist (2a) Benbecula – South Uist West (2b). There will also be partial cable decommissioning/removal at Eriskay 1a. Please refer to Figure 3, Figure 4, Figure 5, Figure 7, Figure 8, Figure 10 and Figure 11 for site specific photographs.



Figure 3 - Proposed working corridor on Eriskay

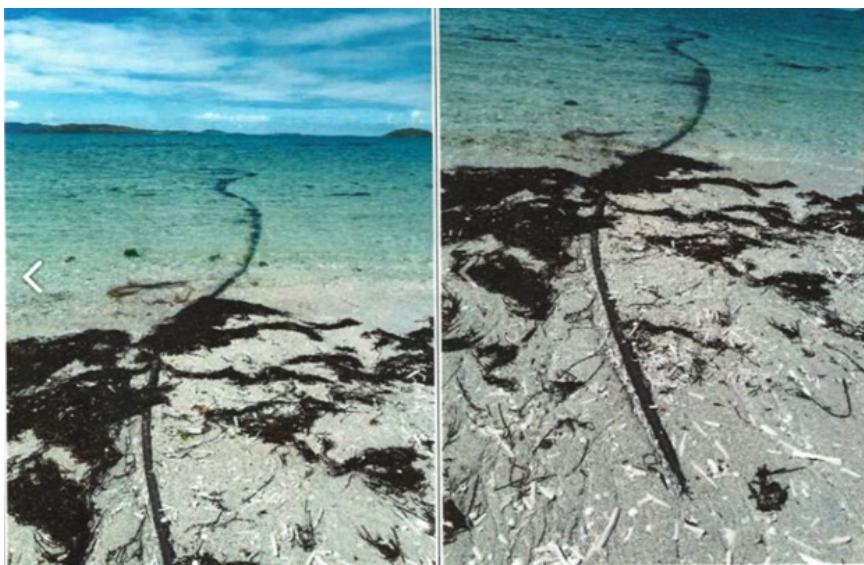


Figure 4 - Eriskay 1a shore end (towards Barra), showing exposed decommissioned cable



Figure 5 - Eriskay 1b (towards Barra), showing exposed in-service cable



Figure 6 - Proposed working corridor, Benbecula - North Uist (2a)



Figure 7 - North Uist shore end, showing exposed cable



Figure 8- Benbecula shore end, showing exposed cable



Figure 9- Proposed working corridor, Benbecula - South Uist West (2b)



Figure 10- Benbecula shore end, showing exposed cable



Figure 11- South Uist West shore end, showing exposed cable tape

Cable Route	Landfall	Cable Removal	Split pipe installation	Rock bag installation	Concrete Bag Removal	Cable Burial
Eriskay Barra 1a	Eriskay	Circa 60m of cable to be removed from Low Water to dunes. = 654 Kg	-	-	-	-
Eriskay Barra 1b	Eriskay	-	360 shells required. Circa 40-50m from Low Water to sand dunes	Up to 10, above High Water	-	-
Benbecula - North Uist 2a	North Uist	-	210 shells required. Circa 35m required from Low Water to shore		Removal of 1 concrete bag	-
Benbecula - North Uist 2a	Benbecula	-	210 shells required. Circa 35m required from Low Water to shore	-	-	-
Benbecula - South Uist West 2b	South Uist West	-	-	-	-	On sections of exposed existing cable from South Uist West landfall

						to Benbecula land fall.
Benbecula - South Uist West 2b	Benbecula	-	-	-	-	On sections of exposed existing cable from South Uist West landfall to Benbecula land fall.

Table 1-Planned works at each location

1.2.2. Eriskay – Barra

Eriskay – Barra (1a) - Decommissioned

This cable has been disconnected from distribution network and requires:

1. Mobile welfare unit and general hand held cutting equipment mobilised to site
2. Disconnect subsea cable to be cut within the marine channel at low water, at approx. 40-50m from the sand dunes.
3. The cable will be then be cut, with hand held cutting tool, b) earthed and c) capped, with cold shrink cap at low water (seaward side of the dune). The cut cable will then be removed from low water and shore environment. The total estimate of cable to be removed is 60m, which equates to 654kg

Eriskay - Barra (1b)

1. Cable fully exposed on beach, suspended from the dunes and has been pulled over rocky outcrops.
2. Under cable support required (using up to ten 2 tonne rockbags), beside the dune where the cable is suspended. These rock bags will be placed on mobile sand, above high water.
3. Manual addition of 360 half shell protection to be added to the cable, please refer to Benbecula - North-Uist, for intended schedule of work for split pipe installation.

1.2.3. Benbecula

Benbecula - North Uist (2a)

1. Placement of 420 split pipe/iron shells at both landfalls (210 at Benbecula island landfall and 210 at North Uist landfall)
2. Mobilisation of 7 tonne excavator, mobile welfare unit (suitable for a max. of 5 personnel) and equipment close to the project location
3. The iron half shells will be delivered by HIAB lorries close to the project location
4. Iron shells will then be transferred from the HIAB lorry into a tracked excavator for transport to the cable
5. Where necessary, loose stones from low water or shore end will be cleared from around the cable using a small excavator or manually by hand
6. Individual iron half shells will be manually placed around the exposed cable, approx. 40-50m length will be required from low water towards to the foreshore. To ensure that they sufficiently cover the cable the two half shells will be fused together.
7. The half shell will then be secured to each other and held in place by clamps.
8. Removal of any excess shells and equipment from the project locations.
9. The shells will stay in place until further maintenance work is required.
10. There may be a requirement to remove 1 rock bag at the North Uist landfall.

Benbecula - South Uist West (2b)

1. Mobilisation of 7 tonne excavator, mobile welfare unit and equipment close to project location
2. The cable dries out between both landfalls and is exposed in sections between both shore ends. These areas require burial the of exposed cable from Benbecula landfall to South Uist West landfall at low water.
3. This will be achieved by using a 7 tonne excavator to create a trench alongside the existing cable route.
4. The existing cable will then be secured within the trench.

- This will then be backfilled with 'won' material, to ensure minimal disruption to ecological habitats. Please also refer to figure 12 for cross section of proposed burial.

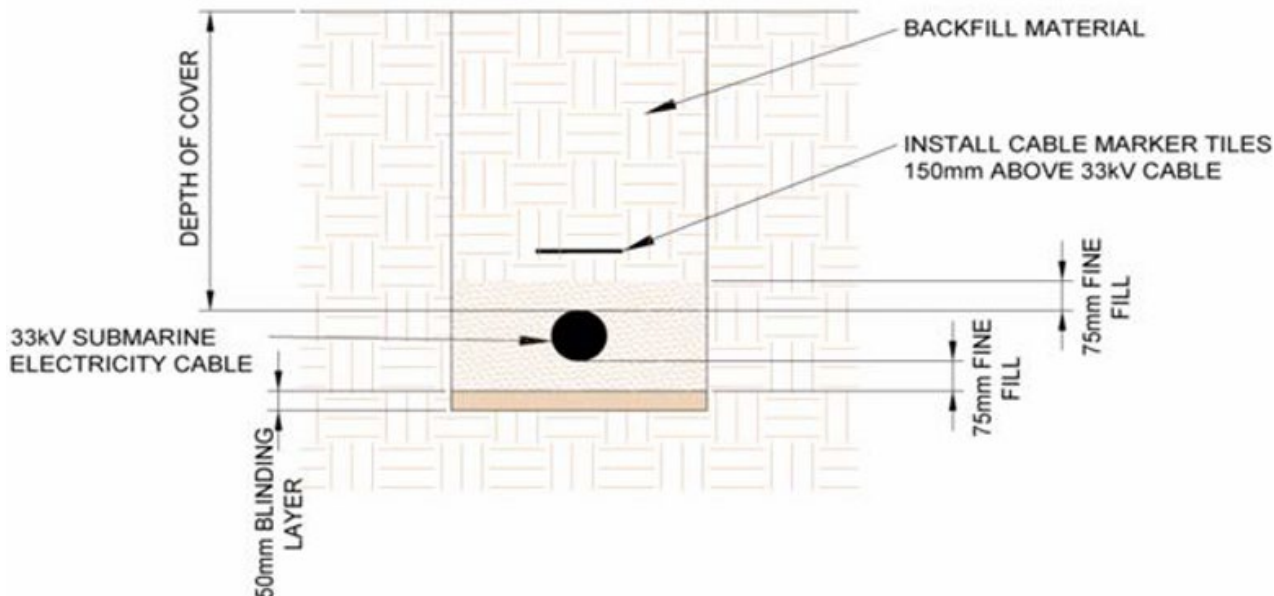


Figure 12 - cross section of proposed burial

The proposed works to all site locations would commence as soon as feasible to do so tide/weather permitting. Access will be taken using existing access tracks where possible and then across open moorland.

1.3. Construction Programme

Works will take place when an appropriate tide will permit. This should be achieved between September 2020 – September 2021. Aiming for a possible target date of March 2021, to carryout the proposed, over two spring tides.

1.4. Onsite Roles and Responsibilities

The roles and responsibilities of those onsite with a responsibility to manage environmental risk are described in Table 2..

Table 2-Roles and Responsibilities on site

Role	Responsibility	Contact details
Project Manager (SSEN on site as required)	<ul style="list-style-type: none"> Oversee the project to ensure that the CEMP is completed; and; Ensure the Construction Manager(s), Site Manager(s), Project Environmental Manager/ECOW(s) and Consultant Archaeologists are aware of the requirements of the CEMP and that these requirements are carried out in line with requirements. 	Kevin Wilson, Tel. 01738 453723, mob. [REDACTED] kevin.1.wilson@sse.com
Site Supervisor (SSEN on site as required)	<ul style="list-style-type: none"> Ensure the implementation of the CEMP; Ensure that the workforce is made aware of environmental risks/issues associated with the project; Ensure that environmental incidents are reported to the company Helpline and Client in line with reporting timescales and requirements; 	Iain Firth Tel.01463 728 831 M: [REDACTED] iain.firth@sse.com Scottish & Southern Electricity Networks, 10

	<ul style="list-style-type: none"> • Ensure that environmental issues are included in site management meetings; • Ensure that site environmental controls are regularly monitored and recorded; and • Ensure environmental risk assessments are up to date and changes to the construction site posing environmental risk are recorded on the risk assessment, and where necessary updates/amendments to the CEMP are completed. 	Henderson Rd, Inverness, IV1 1SN
BMC Assistant Project Manager	<ul style="list-style-type: none"> • Oversee the project to ensure that the CEMP is completed • Ensure that the workforce is made aware of environmental risks relating to the project; • Ensure environmental risk assessments are up to date and changes to the construction site posing environmental risk are recorded on the risk assessment; • Assisting SSEN with Landowner liaison/coordination 	Suzanne Grimes Tel : ██████████ sgrimes@briggsmarine.com
BMC Site supervisor	<ul style="list-style-type: none"> Ensure the implementation of this plan; • Ensure that the workforce is made aware of environmental risks relating to the project; • Ensure that environmental incidents are reported to the company Helpline and Client in line with reporting timescales and requirements; • Ensure that environmental issues are included in site management meetings; • Ensure that site environmental controls are regularly monitored and recorded; • Inform BMC PM of any new environmental risk 	TBC
Role	Responsibility	Contact details
ECoW	<ul style="list-style-type: none"> • Undertake pre-construction site walk over of all proposed work sites Co-ordinate and manage the identified environmental issues on the project • Ensure the implementation of this plan; • Provide support on any environmental issues on the Project; • Ensure environmental risk assessments are up to date and changes to the construction site posing environmental risk are recorded on the risk assessment, and where necessary updates/amendments to the CEMP are completed; • Provide additional technical support to the Project as required by the Project Manager/Site Supervisor/Contractor Project Manager; and • Investigate any significant environmental incidents that occur on the Project. 	Tracy Lang Consultant Ecologist WSP Tel: 0141 418 7357 Tracy.Lang@wsp.com



2. GENERAL ARRANGEMENTS

2.1. Hours of Work

Most construction activities will be undertaken on Monday to Sunday between 07:00 and 19:00, daylight and tide dependant.

2.2. Management of Works

Table 3 shows the project management roles and named personnel accountable for and relevant to the implementation of the CEMP.

Table 3-Management Roles

Role	Name and contact details
SSEN Project Manager	Kevin Wilson Tel. 01738 453723, mob. [REDACTED] E: kevin.1.wilson@sse.com
SHE (Safety Health Environment)	John Ferguson Tel. 01463 728428, mob [REDACTED] E: john.ferguson@sse.com
Site Supervisor	Iain Firth 01463 728 831, M: [REDACTED] E: iain.firth@sse.com Scottish & Southern Electricity Networks, 10 Henderson Rd, Inverness, IV1 1SN
BMC Project Manager	Suzanne Grimes Tel : [REDACTED] E : sgrimes@briggsmarine.com
WSP Contact	Tracy Lang Tel: 0141 418 7357 E: Tracy.Lang@wsp.com

2.3. Communication and Monitoring

Table 4 describes the mechanisms for the communication of environmental risk and the frequency at which they shall be completed.

Table 4-Planned Communications

Meeting/Briefing	Frequency
HSEQ and Progress Meeting	Weekly
Daily site team briefs	Daily
Risk Assessment/Method Statement briefings	Each job task

Environmental Toolbox Talks including good environmental practice	Minimum of one per fortnight
Site Induction	On first attendance at site
Suitable monitoring of the CEMP implementation	Identified activity of the ECoW

3. SITE MANAGEMENT

3.1. Site Layout and Housekeeping

Mobile welfare units will be available to site personnel and will not require any ground preparation. Material laydown areas shall be limited to short durations and be in the immediate vicinity of the works, i.e. iron shells delivered to site prior to work commencing.

The site will be maintained in a tidy and well-managed state at all times.

3.2. Site Traffic

Traffic during construction will be minimal and restricted to a small number of works vehicles and machinery. Access will be taken using existing access tracks where possible. All traffic shall be escorted in by approved site personnel.

3.3. Plant and Equipment

Construction vehicles and plant shall be regularly maintained. Emergency maintenance to construction plant will be carried out on site, where practicable, in a designated area and on an impermeable surface. In order to contain any environmental risk posed by vehicle and plant maintenance.

A lockable bunded fuel bowser constructed in accordance with SEPA Guidelines – Guidance 2, will be used for refuelling on site.

In the first instance, please refer to Appendix B CB0192 – 1003 GEMP, where GEMP 7 – Oil storage and refuelling should be implemented.

Where practicable, refuelling shall take place at a dedicated refuelling area. Where this is impracticable, a nominated Fuel Marshal shall be responsible for overseeing refuelling activities and to ensure that refuelling of mobile plant does not take place within 30 m of a water environment. The refuelling bowser shall be equipped with a spill kit (refer to section 7.2 – Emergency procedures, for information regarding spill kits) and personnel will be trained in their use as part of the site induction training.

All construction vehicles and mobile plant operators shall have easy access to spill kits during vehicle and mobile plant operation through a combination of vehicle spill kits and larger capacity fixed location spill kits.

Plant nappies/drip trays shall be utilised for stationary plant and regular inspection arrangements shall be in place. Where plant is left stationary in excess of one hour, plant nappies will be required.

3.4. Contractor's Plant

BMC will provide a list of plant proposed to be used to undertake the works. The BMC Project Manager must be provided with this list prior to works commencing. It will be the responsibility of the SSEN Project Manager to approve all as appropriate.

3.5 Lighting

Lighting will be directional and positioned to minimise light spill outside the site compound/works area. Particular care should be taken to avoid spill on known sensitive receptors (such as the shore).

No artificial lighting should directly illuminate otter foraging/commuting habitat and/or be left on overnight in proximity to such features unless authorised by the appointed ECoW.

It is not anticipated that artificial lighting will be required due to adequate daylight hours to complete the tasks.

4. SITE SPECIFIC ENVIRONMENTAL MANAGEMENT

4.1. Introduction

Table 5-Site Specific Designations

Designation	
Special Area of Conservation (SAC)	Areas considered to be important for certain habitats and non-bird species of interest in a European context. One of the main mechanisms by which the EC Habitats and Species Directive 1992 will be implemented.
Special Protection Area (SPA)	Sites designated by the UK Government to protect certain rare or vulnerable species and regularly occurring migratory species of birds.
Site of Special Scientific Interest (SSSI)	<p>Sites of Special Scientific Interest (SSSIs) are those areas of land and water that best represent natural heritage in terms of their:</p> <ul style="list-style-type: none"> • flora – i.e. plants • fauna – i.e. animals • geology – i.e. rocks • geomorphology – i.e. landforms • a mixture of these natural features
Marine Protected Area (MPA)	Thirty Marine Protected Areas (MPAs) were designated in Scotland's seas on 24 July 2014; 17 of these MPAs fall under the Marine (Scotland) Act 2010 in inshore waters.
Marine Consultation Area (MCA)	Marine Consultation Areas are identified by Scottish Natural Heritage as deserving particular distinction in respect of the quality and sensitivity of the marine environment within them. Their selection encourages coastal communities and management bodies to be aware of marine conservation issues in the area.
RAMSAR	A Ramsar Site is a wetland site designated of international importance under the Ramsar Convention. The Convention on Wetlands, known as the Ramsar Convention, is an intergovernmental environmental treaty established in 1971 by UNESCO, and coming into force in 1975.
Natural Nature Reserves	National Nature Reserves (NNRs) are areas of land set aside for nature. As in other countries, the accolade is given to Scotland's best wildlife sites, to promote their conservation and enjoyment. Most reserves contain nationally or internationally important habitats and species, so the wildlife is managed very carefully. Visitor facilities are designed and managed to ensure that people can enjoy NNRs without harming or disturbing the wildlife that lives there.

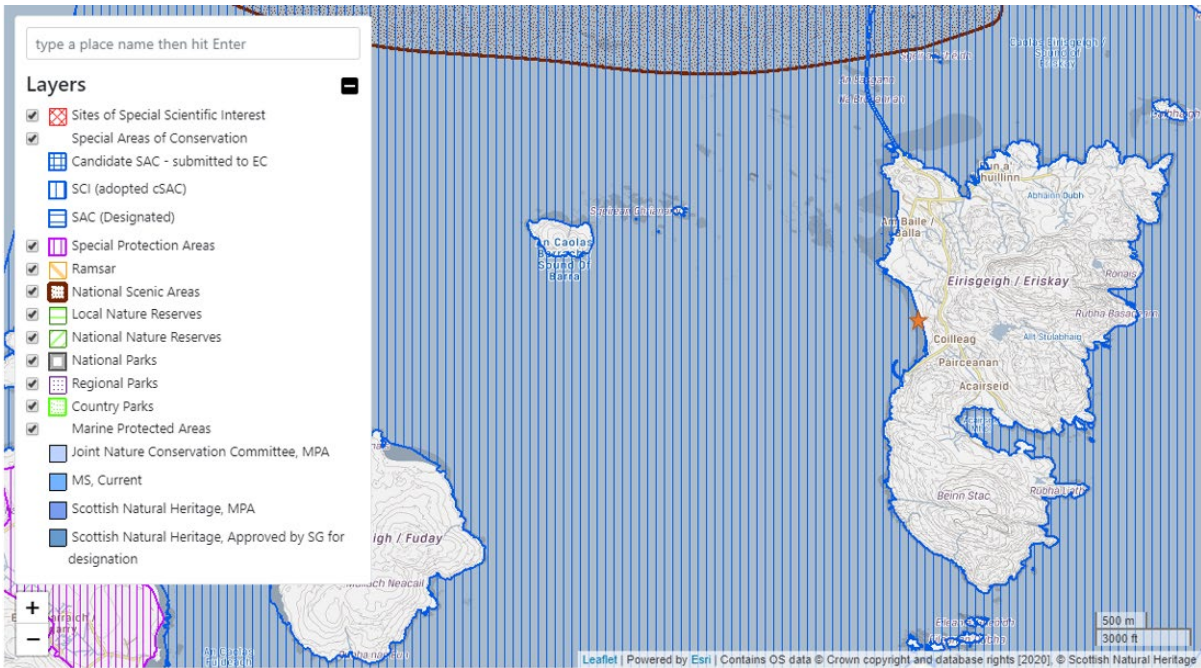


Figure 13 - Eriskey SAC site designations highlighted, adjacent to proposed work site (★)

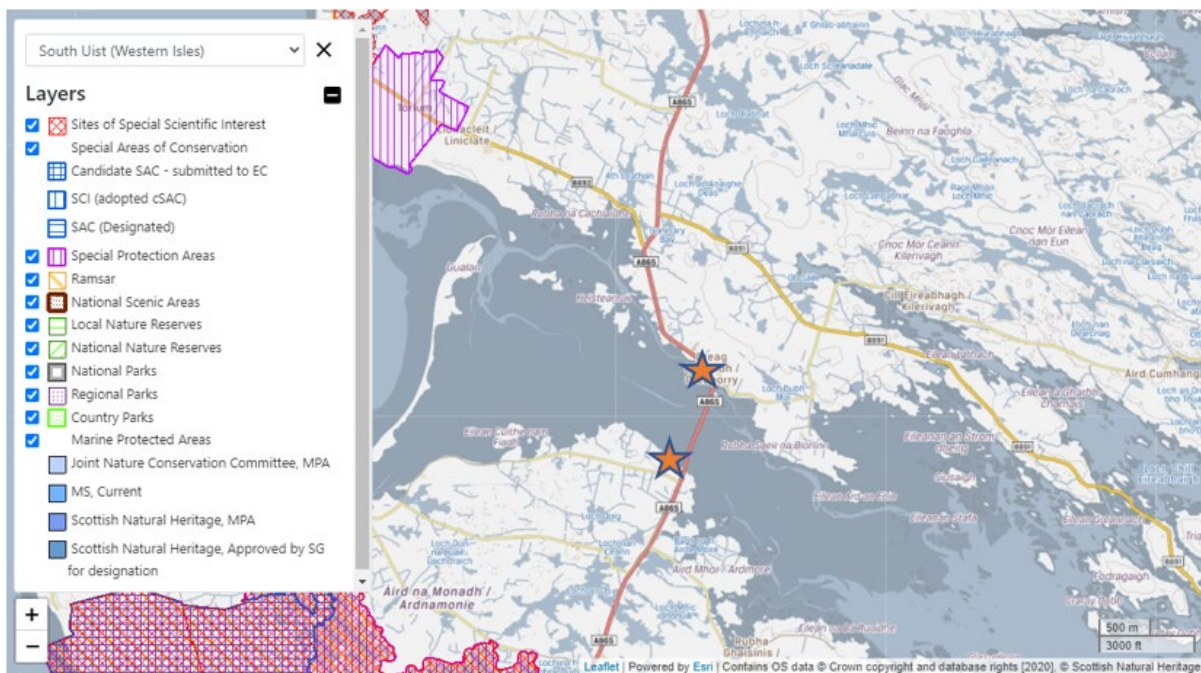


Figure 14- Benbecula and South Uist, no site designations in or adjacent to proposed work site (★)

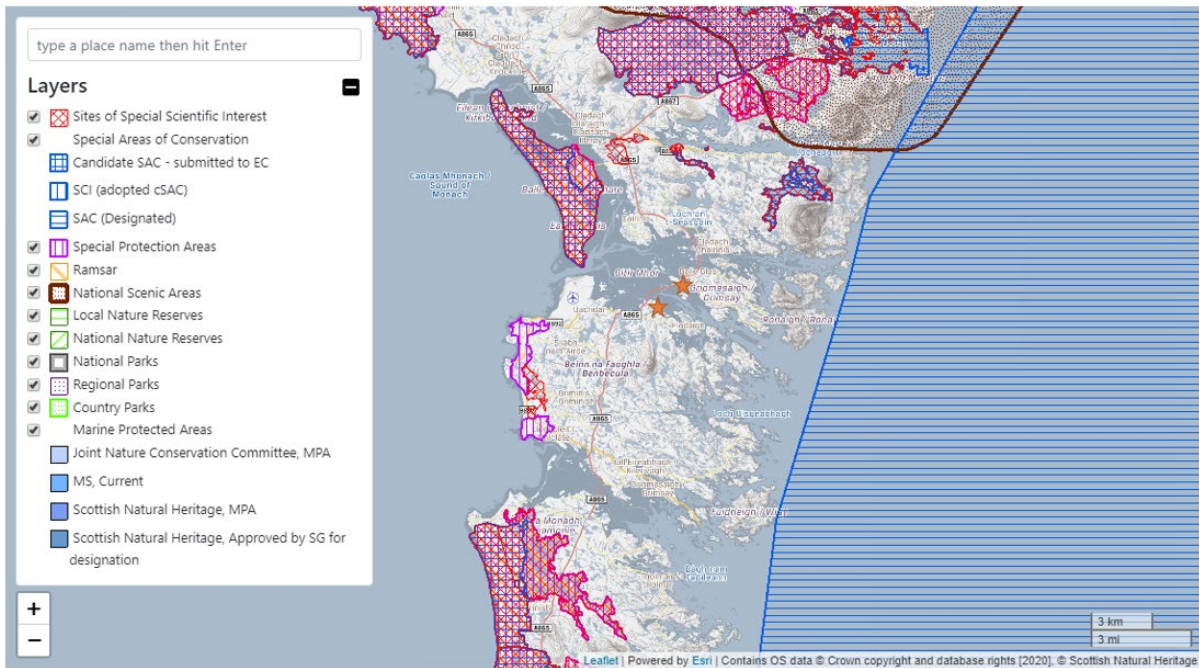


Figure 15- Benbecula and North Uist, showing no site designations within or adjacent to proposed work site (★)

Figure 13, 14 and 15 illustrate any environmental constraints within or adjacent to the proposed working sites, as per Scottish National Heritage website (nature.scot). Figures 14 (Benbecula and South Uist West) and 15 (Benbecula and North Uist), show that when undertaking a desk top study, no site designations were found in or adjacent to these areas.

Figure 13 shows a SAC designated area, for the proposed Eriskay site, within the Sound of Barra. The qualifying species known within this designation, are Harbour / Common seal (*Phoca vitulina*). This SAC designation is to avoid deterioration of the habitats or significant disturbance to the species, ensuring that the integrity of the site is maintained and the site makes an appropriate contribution to achieving favourable conservation status.

Please refer to Appendix A, Potential seal haul out areas. The working site on Eriskay is not known to be a potential Seal haul out location. However, to ensure that there will be disturbance, a pre-construction ECoW walkover will be undertaken and also daily checks of the beach areas for hauled out seals will be performed in the vicinity of the landfall points (prior to the commencement of works that day).

If still no seal haul out is recognised, all BMC personnel must still be aware of the Scottish Government advice and responsible behaviour around seals and this information will be included within the daily toolbox talks.

<http://www.gov.scot/Resource/0045/00452869.pdf>

Other SAC qualifying interests within the Sound of Barra are Subtidal Sandbanks and Reefs. Please refer to Appendix B – Sound of Barra Qualifying habitats, the map highlights that no subtidal sandbanks or reefs are within the proposed working area on Eriskay, however, are adjacent to this area. In view of this, an ECoW Pre-construction walkover will be undertaken. If any subtidal sandbank or reefs are deemed to be within the work site, then further mitigation advice from the ECoW will be sought and this CEMP will be updated.

Site specific measures to manage the environment are described in Table 6, alongside other information to allow effective management of the environment. This live document will be updated to reflect any further advice given to BMC from WSP, pertaining to the best environmental management practice.

BMC will also work to any marine licence requirements that may be part of the marine licence application.

Table 6-CEMP Requirements

Environmental Feature	CEMP Requirement	When Due	Responsibility	Date completed/ reviewed or checked	Comment / Ongoing actions required
All	<p>The ECoW will attend proposed work locations for a pre-construction walkover. It is expected that this will occur August 2020</p> <p>This will be undertaken to ensure that all mitigation will be put in place throughout the construction period and to ensure that all environmental mitigation is relevant to the site.</p>	Pre-construction Construction	ECoW / BMC		
Terrestrial Ecology	<p>All site personnel will attend a Tool Box Talk, as part of their site induction. The toolbox talk will include:</p> <ul style="list-style-type: none"> - an outline of roles and responsibilities relating to any marine / terrestrial ecology within or adjacent to site; - a description of any key ecological features present, including photographs to help contractors recognise these; - any specific mitigation measures that need to be implemented on site, including any required protection zones around any discovered sensitive habitat; and - the procedure to follow if unexpected wildlife is encountered during the works. 	Pre-Construction	ECoW BMC		
Terrestrial Ecology	Understand and implement all guidance and contained in the CB0192 – 1004 - General Environmental Management Plan (GEMP) and it's appendices Otter and Bird Species Protection Plans (SPPs) for standard best practice methods.	Pre-Post Construction Construction	BMC ECoW SSEN		
Otters	<p>During the desktop study, it is not been highlighted that any sensitive Otter habitat is in or adjacent to any of the proposed work sites.</p> <p>However, during a pre-construction ECoW walk over, if any Otter holt is found to be within 30 m of any work site, work shall require an otter licence from SNH.</p>	Pre-Construction	ECoW BMC		

	<p>If this is the case, this CEMP will be updated to reflect any condition(s) that need to be put in place and all conditions of the licence shall be adhered to and;</p> <p>Any protection zones will be marked around the holts by the ECoW.</p>				
Otters	<p>If otter breeding at a site is not picked up during the preconstruction survey, but appears to commence when construction work is already underway, on-site activity will be suspended and the ECoW will be consulted. Suspension will remain in place until it can be demonstrated that:</p> <ul style="list-style-type: none"> (a) breeding is not occurring on site (could take up to 8-10 weeks); or (b) the cubs are sufficiently old (and therefore mobile) for alternative sites to be used. If this is not possible, a larger (up to 200 m) protection zone will be required around the breeding area, or a licence sought; the exact approach being agreed in consultation with SNH. <p>In all cases listed above, all traffic shall be escorted in by BMC approved personnel at all shore end work sites.</p>	Construction	BMC		
Seals	<p>There is a potential for both harbour seal and grey seal to be present in coastal areas in the vicinity of the works. No known seal haul outs are within the proposed working corridors (please see Appendix A – Potential seal haul out sites). However, a pre-construction ECoW walkover will be undertaken and daily checks of the beach areas for hauled out seals will be performed in the vicinity of the landfall points (prior to the commencement of works that day).</p> <p>BMC personnel will be aware of the Scottish Government advice and responsible behaviour around seals</p> <p>http://www.gov.scot/Resource/0045/00452869.pdf</p> <p>Pre-construction checks will be required if works are delayed and occur during seal pupping seasons (June/July for harbour seal and September-December for grey seal).</p>	Pre-Construction	BMC		
Birds	<p>The proposed working areas are not listed as a Special Protection Area (SPA). However, a ECoW site walkover will also determine any presence of breeding birds.</p> <p>BMC pre-construction check survey will also be required to confirm the absence of nesting birds no species will be disturbed.</p> <p>If required, all mitigation will be adhered to, according to CB0192 – GEMP, Appendix A Special Protected Plan – Breeding Birds.</p>	Pre-Construction	ECoW BMC		

Habitats	<p>Desktop studies have shown one area sensitive habitat of sandbanks and reef are adjacent to the Eriskay worksite. A pre-construction ECoW site walkover will conclude any mitigation that may be required regarding sensitive habitats.</p> <p>If deemed necessary, works will be micro-sited to avoid as far as possible. Discrete areas of the most sensitive habitat will be clearly demarcated by the ECoW, using means such as hazard tape where they occur in proximity to the works. BMC personnel will follow ECoW to instruction to ensure no disturbance/risk to habitats.</p>	Pre-Construction	ECoW BMC		
Cultural heritage	<p>During the ECoW pre-construction walk over in August, the archaeology of the proposed work locations will be considered. If any further mitigation is required, then this CEMP will be updated.</p>	Pre-Construction	ECoW BMC		
Recreation	<p>All HSE construction signage to be put in place and working areas to be sectioned off from the general public, to ensure that there will be no risk or harm.</p>	Pre-Construction Construction	BMC		
Marine Environment	<p>All works will be completed in accordance with the Marine Licence.</p>	Construction	BMC ECoW		

5. WATER QUALITY PROTECTION AND POLLUTION

5.1. Prevention

5.1.1. Introduction

The following sections describe measures to protect water quality and prevent pollution.

5.1.2. Drainage Management Strategy

The water environment could be potentially polluted during maintenance works, by virtue of:

- spillage of oils or other pollutants from machinery and vehicles.

5.1.3. Pollution Prevention

The pollution prevention of groundwater is to be prevented by adherence to the SEPA Guidance Pollution Prevention (GPP) series, (but also taking cognisance of the former Pollution Prevention Guideline (PPG) series). Please also refer to CB192-GEMP, section 1 - Watercourse Crossings and section 2– 'Working In or Near Watercourses' for best practice methods.

Training will be provided to on-site personnel via toolbox talks highlighting the risks of the polluting water environments during construction and highlighting sensitive locations.

Water quality monitoring by means of visual inspection will be undertaken, as a minimum, on a daily basis (and more frequently during periods of poor weather) of any areas considered at high risk during work activities. Temporary works areas will be sited at least 50m from the water environment including waterbodies where possible to reduce the potential for transmission of sediment laden run-off or accidental spillages.

5.1.4. Watercourse Crossing and Private Water Supplies

Desk top studies have shown that there are no registered private water supplies on Benbecula, North Uist, South Uist and Eriskay. On-Site based investigations will also be carried out before work commences and if any watercourses are to be crossed by the access route, this will be undertaken in line with SEPA's General Binding Rule 9 (1), specifically the following requirement:

Following the operation of the machinery, any damage caused by the operation to the bed and banks of the surface water must be repaired, including re-establishing vegetation on any areas of bare earth on the banks resulting from the operation, either by covering the area with grass turfs or lining them with a biodegradable geotextile and seeding. https://www.sepa.org.uk/media/34761/car_a_practical_guide.pdf.

Please also refer to CB0192–1004 GEMP, section 2 - working in or near surface waters.

5.1.5. Water / Ground Contamination (from Spillage)

Potential pollution of the water environment and groundwater is to be prevented during works by adhering to the following measures:

- All fuel storage containers are to be labelled showing contents and maximum capacity.
- Plant nappies are to be used during refuelling operations.
- All works within 30 m of a water environment must be carried out following SEPA GPP guidance and following a site specific environmental briefing.
- Machine operators are to carry out daily inspections of plant, including hydraulic lines. This will be recorded on a mobile plant and lifting equipment inspection check sheet.
- Spill kits are to be readily available at all sites and with all items of mobile / static plant.
- All sites are to be kept tidy and clean. Materials and plant will be securely stored to avoid trespass and vandalism.
- All oil storage tanks, drums etc. Must be placed on level ground with 110% bund containment and inspected daily (where applicable).
- During maintenance work on plant, appropriate containers and drip trays are to be used to mitigate unavoidable spillage. Similar measures will also be used when re-fuelling.
- Any contamination of ground will be removed immediately, in such a manner that does not have the potential to cause further pollution to the surrounding environment. Contaminated spoil is to be treated as Hazardous (Special) Waste and will be appropriately disposed of by a licensed waste contractor.

All welfare facilities are to have an appropriate system for the treatment or removal of foul waste and provision made for the regular removal of waste products. Please also refer to CB0192-1004-GEMP, section 2 - working in or near surface waters

5.1.6. Fuel storage

In the first instance please see CB0192-GEMP, Section 2 - working in or near surface waters, Section 5 – Contaminated Land and Section 7 – ‘Oil Storage and Refuelling’.

No refuelling is to take place within 30 m of the water environment limiting any potential spillages from polluting the water environment.

Fuel storage will be at the main compound situated on impermeable ground.

Refuelling of plant and machinery will only take place within a defined area within site compounds. Clearly defined areas for storage of oil and refuelling will be identified as part of the compound establishment process.

Spill kits will be located and maintained at all oil storage and refuelling locations and in all site vehicles and plant.

5.1.7. Pollution Control

The fundamental measure of pollution control is to seek to stop the action which is causing pollution immediately, CB0192 – GEMP in sections, 2 - working in or near surface waters, 5 – Contaminated Land and 7 – ‘Oil Storage and Refuelling’ but additionally:

- take immediate remedial action - block spill; place booms and absorbent materials to help soak up spill;
- ensure all plant is double bunded/double skinned/ appropriate drip trays in place to contain leakages; and
- have control measures in place and have fully stocked spill kits easily accessible.

5.1.8. COSHH Assessment

All substances identified as hazardous will be Control of Substances Hazardous to Health (COSHH) assessed and appropriate COSHH sheets for each individual material type retained on site and accessible to all works personnel. The use of non-assessed substances is prohibited. All operatives are required to comply with the controls specified within COSHH assessments. All COSHH items will be stored in a secure, ventilated store, separate from non COSHH items. All COSHH waste items will be discarded within a defined COSHH waste storage receptacle until being removed from site by a suitably licenced contractor (suitable for the removal of hazardous wastes).

COSHH assessments cover all range of materials and are not limited to construction associated items and will additionally be provided for any domestic cleaning materials used on site (e.g. bleach).

5.1.9. Welfare Facility

Welfare facilities on site will be sufficient to adequately accommodate all site personnel.

5.2. Air Quality

5.2.1. General Principals

Emissions to the atmosphere in terms of gaseous and particulate pollutants from vehicles and plant used on the site, will be controlled and limited as far as reasonably practicable.

5.2.2. Environmental Control Measures

The following control measures will be implemented to minimise the risks to air quality on and off site.

- vehicles, plant and equipment will be regularly serviced and inspected and any defects e.g. leaks or dark smoke, reported and removed from use or rectified immediately;
- records of plant and equipment maintenance/inspections will be available on site for inspection;
- engines will be turned off when not in use.

6. NOISE AND VIBRATION

6.1. General Principals

There is limited potential for noise impacts. The closest works are within approximately 320m on North Uist, 150m South Uist and 180m on Eriskay-Barra of residential dwellings.

Noise from maintenance works will be minimised using Best Practicable Means, as defined under Section 72, Part III of the Control of Pollution Act (CoPA) 1974. BS 5228 provides guidance on controlling noise from work sites in Clause 8, which will be followed where appropriate and practicable.

Measures will be adopted on both Sites to reduce noise of equipment and the work including those listed below. Please refer to CB0192 – 1004 – GEMP, section 14 noise and vibration.

7. EMERGENCY PROCEDURES

7.1. Introduction

Please refer to CB0192 – 1004 – GEMP, section 14, for procedures to be followed in the event of an environmental incident or pollution event.

7.2. Incident Reporting

In the event of a pollution event or environmental incident on site an Incident Report Form will be submitted to the SSEN Project Manager and SHE representative as specified in Table 2.1.

In the event pollution enters a surface water drainage channel SEPA must be informed. Should pollution enter surface water or foul water drainage channels Scottish Water and Comhairle nan Eilean Siar Council must also be informed. Should an environmental incident or pollution event take place at the shore end location of the works that discharges to the littoral and tidal area, or to sea, this will be reported to SSEN immediately and SEPA subsequently contacted for direction.

7.3. Emergency Contacts

Table 7-Emergency Contact Information

Organisation/Role	Contact Name	Contact Details
SSEN Project Manager	Kevin Wilson	Tel. 01738 453723, mob. [REDACTED] kevin.1.wilson@sse.com
SSEN SHE Advisor	John Ferguson	Tel. 01463 728428, mob [REDACTED] E: john.ferguson@sse.com
SSEN Site Supervisor	Iain Firth	01463 728 831, M: [REDACTED] E: iain.firth@sse.com Scottish & Southern Electricity Networks, 10 Henderson Rd, Inverness, IV1 1SN
BMC Project Manager	Suzanne Grimes	Tel: [REDACTED] sgrimes@briggsmarine.com
ENVIRONMENTAL REGULATORS	SEPA	Western Isles Office 2 James Square James Street Stornoway Isle of Lewis

		HS1 2QN Tel: 01851 706477
	SNH	Stilligarry Isle of South Uist HS8 5RS Telephone: 01313 144190
	Council	Comhairle nan Eilean Siar Balivanich Isle of Benbecula HS7 5LA Tel: 01870 602425
	Marine Scotland	0300 244 4000
EMERGENCY SERVICES	POLICE FIRE AMBULANCE	999 / 101

8. BREEDING BIRD PROTECTION

Construction works have the potential to negatively impact on breeding birds as a result of either direct destruction of nests or disturbance which may result in breeding failure. In addition, some particularly sensitive species are liable to disturbance outwith the breeding season.

In the first instance please refer to CB0192-GEMP, Appendix A Species Protection Plan. Whereby it outlines the procedures that must be followed where there is a potential for breeding birds to be affected. It explains the responsibilities of SSEN, BMC and its Contractors, the legislative protection for birds, and the measures required to minimise impacts on birds and thereby the risk of criminal offences being committed.

Desktop studies have shown that none of the proposed locations are situated in or adjacent to a Special Protected Area (SPA). However, before work commences, BMC will employ an ECoW to undertake a site walkover of all proposed locations, with the aim to fully assess any mitigation that is required. Once this has been undertaken, this walkover will provide BMC with a greater understanding of the mitigations that will be required.

It is BMC's responsibility to comply with all the requirements of this plan and it is both BMC's and SSEN's responsibility to monitor compliance with the plan.

9. OTTER PROTECTION

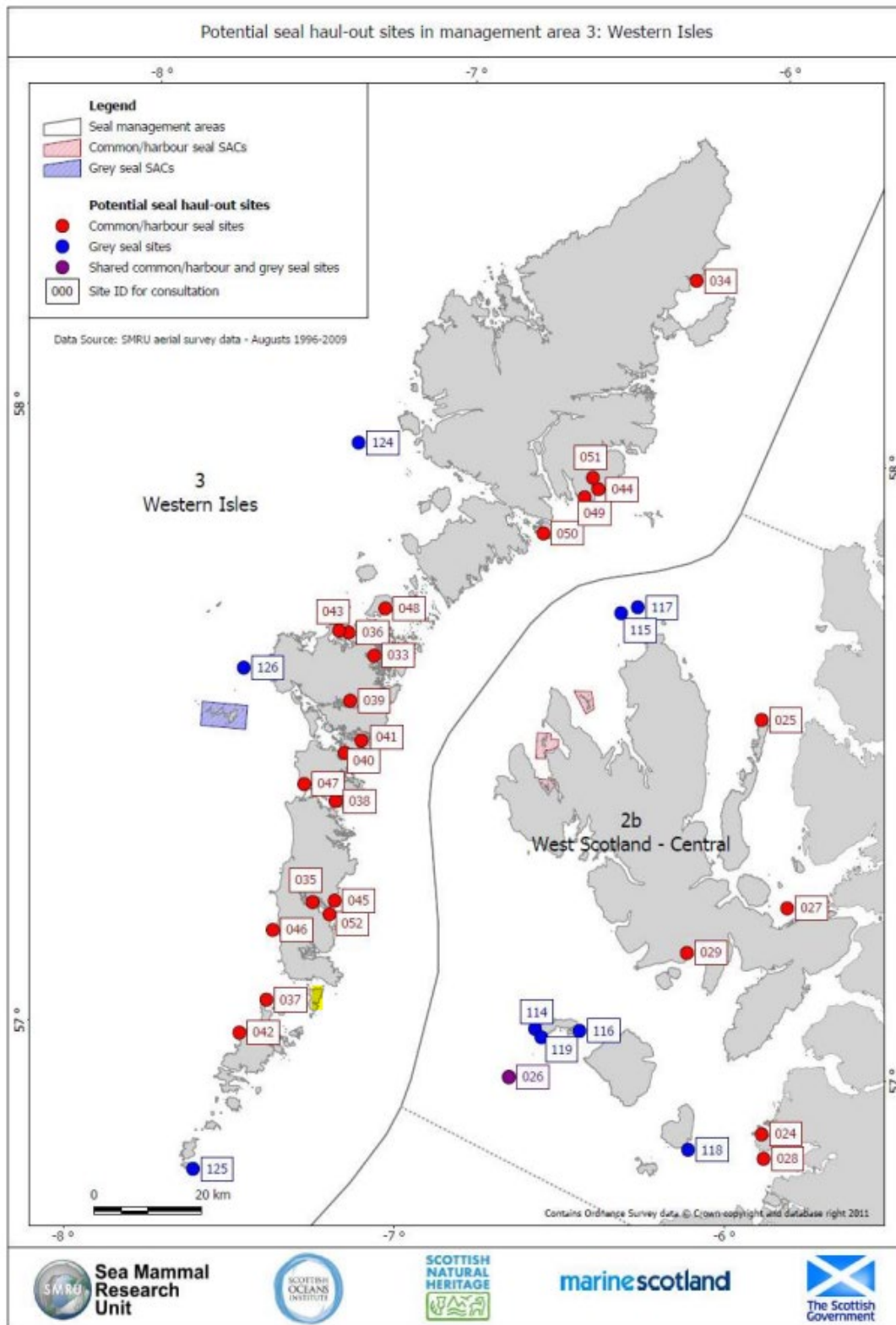
Otter is a European Protected Species and is afforded a high level of protection in Scotland.

Otter mitigation will be confirmed after an ECoW pre-construction site walk over and this CEMP will be updated.

Please also refer to CB0192-GEMP, Appendix B, for general guidance for the protection of otters and their shelters during construction works. The Plan contains two parts and details the procedures that must be followed where there is potential for otter to be present (Part 1), and where a Project Licence for otter has been issued by SNH to cover the project (Part 2):

Appendix A – Potential seal haul-out sites

Western Isles



*Eriskay work site highlighted in yellow within map.

Appendix B – Sound of Barra Qualifying habitats

