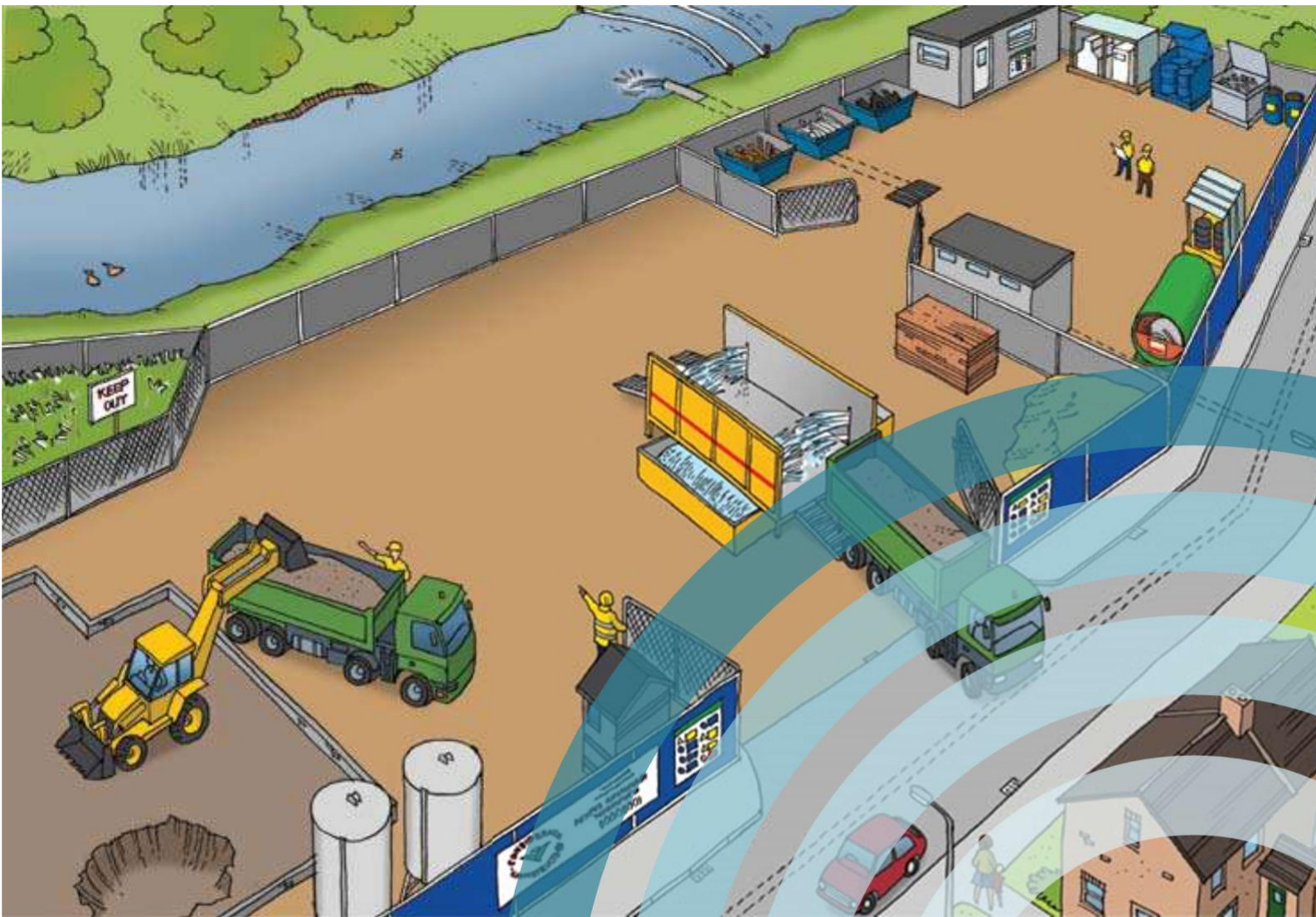




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Environmental Management Plan

Site: CTIL
30731101

1.0 Introduction

1.1. Description of Project

The Shared Rural Network (SRN) will deliver coverage to 95% of the UK, addressing the digital divide by improving coverage in the areas that need it most. Works for this project are to erect a mast for telecommunications on a site known as Tom an Eite (hereby known as The Site). The proposals are to provide a 20m high, static communications mast within a fenced compound. The mast will be set onto a concrete foundation along with associated hardware. There are also plans to provide temporary deployment of a generator and fuel tank as required.

1.2. Site Address

The Application Site is centred on OS grid reference NN2375169419, a location plan and site boundary are shown Figure 1.

Land off Water of Nevis, Mamore Estate, Kinlochleven, Highland, Scotland

Postcode: PH50 4QL

Grid Reference: NN2375169419

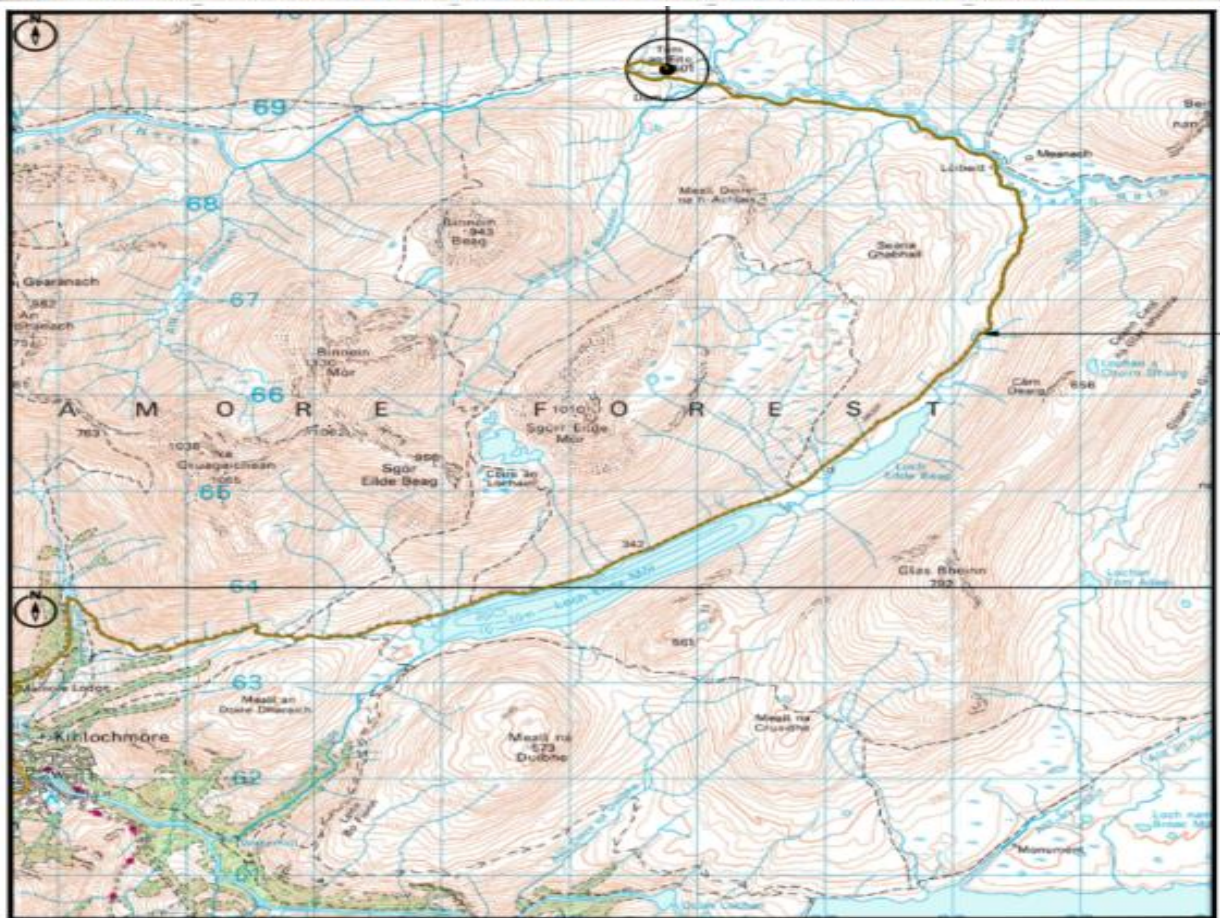
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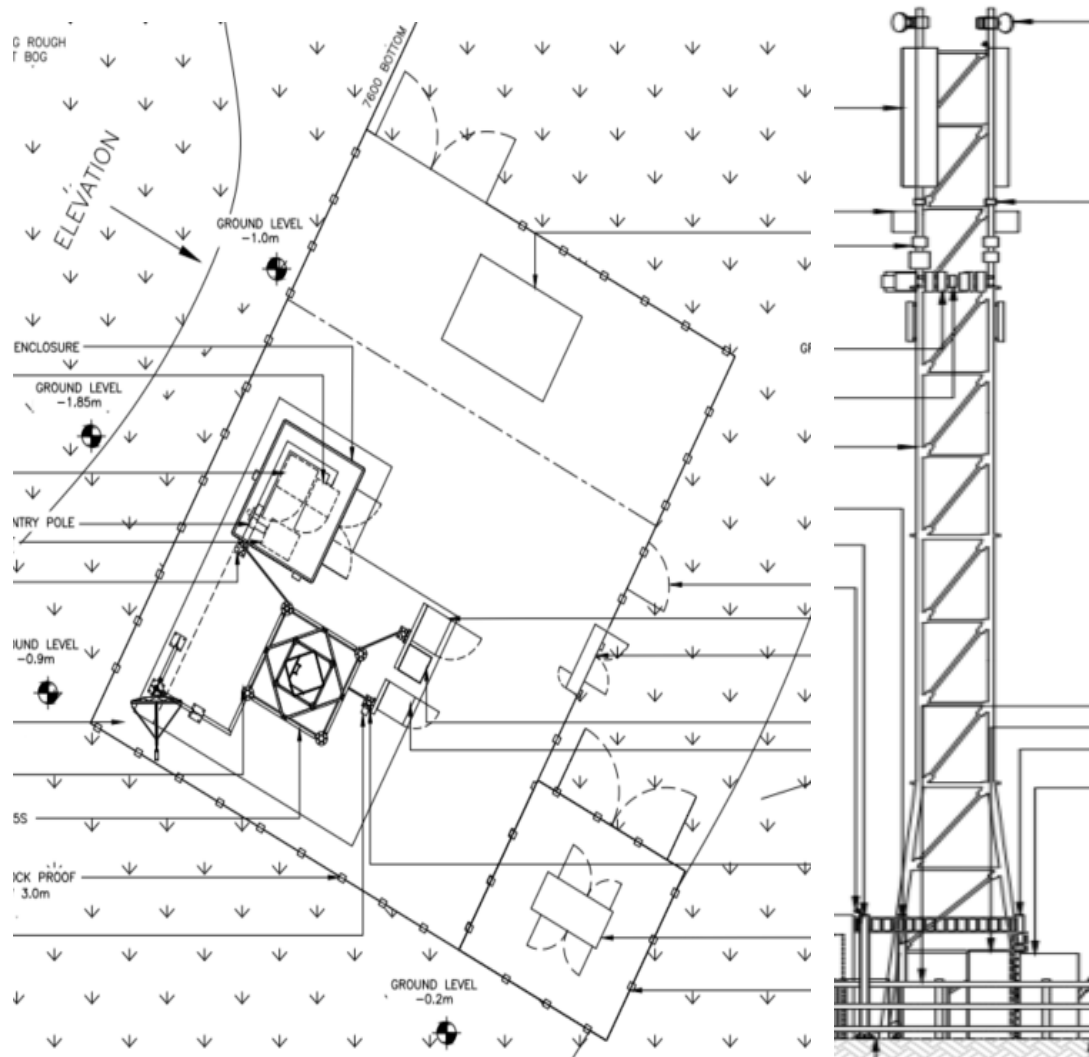
Northing: 769419

What3words: insisiting.untrained.veal

Figure1: Site location and grid reference –







2. Purpose

2.1. Purpose of the CEMP

The aim of this CEMP is to support the work to be carried out at the site known as Tom an Eite.

This Environmental Management Plan describes how the project environmental impacts will be managed and the controls to be implemented on site. The purpose of this Environmental Management Plan is:

- To help ensure compliance with legal and contract requirements.
- To control and, where possible minimise, the environmental impact of the construction works.
- To minimise the risk of causing pollution or a nuisance and associated costs and delays to identify specific environmental requirements in a concise document.
- To improve the sustainability of Clarke Telecom's business activities.

The Environmental Management Plan complies with the procedures defined within the Clarke Management system, which meets the requirements of, and is certified to, the ISO 14001 standard.

The contents of this Environmental Management Plan are specific to the site for which it was developed and shall be utilised by Clarke Telecom staff and its sub-

contractors for the duration of the works. This plan must be available for consultation by all parties.

The QUENSH Supervisor & PICW is responsible for ensuring that this plan is maintained and updated as necessary until site works completion and handover to the customer. The Person in Charge of Works must ensure that all personnel are aware of its contents and requirements.

2.2 Supply Chain

Clarke have a robust system in place to ensure the competencies of our supply chain and sub- contractors and have been vetted using our sub-contractor assessment forms to ensure they have adequate systems and procedures in place with regards to environmental standards.

All sub-contractors will be working under the control of Clarke Telecom and under Clarke Telecom supervision on site.

2.3 CEMP Review and Updating

The CEMP is designed to be dynamic in nature throughout the course of the project. It will be updated at regular intervals as the project progresses and as and when different milestones are reached, such as the completion of different phases.

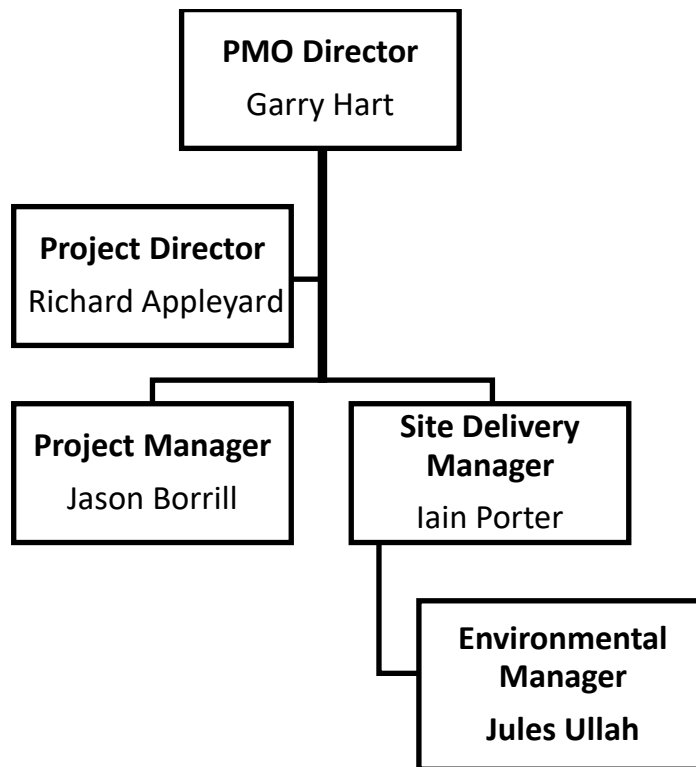
2.4 Project Organisation and Responsibilities

Figure 2 shows an overall management structure for the project from Clarke telecom with roles and responsibilities of key team members.

The main responsibility for the project will be with the Project Director Richard Appleyard, Project Manager Jason Borrill and Site Delivery Manger iain Porter.

Site Delivery Manager, iain Porter, will be responsible for the resourcing of all plant and labour.

Health and Safety team will oversee all health and safety related to the project and will carry out safety audits on site, additionally, Site Delivery Manager will be responsible for the health and safety on site. Lastly, Environmental Manager will be responsible for all environmental aspects.



3.0 SCOPE

3.1. Regulatory Framework

This CEMP has been compiled with consideration given to the following environmental legislations.

Table 1: Regulatory Framework	
Environmental Factor	Status/Legal Protections
Wildlife Sites, e.g., SSSI's	The Wildlife and Countryside Act 1981 (Amendment) (Wales) Regulations 2004
	Countryside Rights of Way (CRoW) Act (2000)
European Protected Species: e.g., Bats & Dormice,	Conservation (Natural Habitats, &c.) Regulations 1994
	The Conservation of Habitats and Species Regulations 2017
Other Protected Species: e.g., Nesting Birds, Reptiles & Badgers	The Wildlife and Countryside Act 1981 (Amendment) (England) Regulations 2004
	Protection of Badgers Act 1992
Invasive Plant Species	Wildlife and Countryside Act 1981 (Schedule 9) <i>It is an offence to cause the spread of Japanese Knotweed or Giant Hogweed</i>
Fuel Storage and Handling	Oil Storage Regulations 2002 <i>Applicable to storage of fuels outside in containers with a capacity greater than 200 litres.</i>

Waste	Environmental Protection Act 1990
	Hazardous Waste (England and Wales) Regulations 2005
	The Waste (England and Wales) Regulations 2011 (as amended)
	Waste Management, The Duty of Care Code of Practice (2016 update)
Water	Water Resources Act 1991 <i>It is an offence to pollute any controlled waters</i>
Environmental Incidents	Water Resources Act 1991
	Environmental Protection Act 1990

3.2. Water

Washing

It is not envisaged that plant, wheel and boot washing will need to be carried out. If this should change following risk assessment it will be undertaken in a designated area of hard standing at least 10 metres from any surface waters.

Concrete wash out will be carried out in to a skip lined with visqueen and waters allowed to evaporate.

Drainage

No underground drainage has been identified at the site.

No contaminated water will be allowed to enter the natural surface drainage channels that have formed on site.

Excavations

The tower base excavation may need to be pumped out to remove accumulated water. The area around the excavation will be reviewed and cut off trenches dug prevent excess water entering the void.

When removing water from the excavation this will be completed by a trained operative utilising an appropriate pump. The water will be run to the natural drainage channel at the side of the access road.

Clarke Telecom Limited will:

Ensure that the person who’s supervising the pumping out of excavations understands how to mitigate pollution.

Where practicable a small sump will be dug for the head of the pump, and it will be surrounded it perforated pipe and a suitable grade of clean stone to reduce silt intake. Water produced may still be silty.

Where possible, switch off the pump before it begins to suck up the last dregs of water as these are likely to contain high levels of silt.

Prevent silty water must being discharged to a watercourse or surface water drain as it will cause pollution.

Allow suspended solids in silty water to settle out before disposal.

3.3 Air Quality

All plant to be modern and well maintained to minimise exhaust fumes and to prevent black smoke.

No waste to be burned on site.

3.4. Noise and Vibration

Noise and vibration should not have an impact on 3rd parties.

The impact of noise and vibration on site operatives has been dealt with in the site-specific RAMS documentation.

3.5.

Stockpiles

Clarke Telecom Limited will;

Prevent stockpiles and exposed ground from generating pollution as water run-off or dust.

Locate stockpiles well away from watercourses, ditches and drains.

Locate stockpiles on level ground adjacent to the site.

Prevent any stockpile run-off from entering drains, ditches and watercourses.

Packaging

All packaging for materials will be removed from site by the relevant contractor.

Where packaging remains on site this will be disposed of by Clarke Telecom personnel.

Any stored materials will be checked to ensure packaging is secure and cannot be blown around site or the surrounding area.

3.6. Geology & Soils

A Geotechnical site investigation report is awaited for site location.

3.7. Landscape

All hedgerows in England and Wales, and hedgerows designed as “Ancient Hedgerows” in Scotland are protected. Some trees may have protection orders on them.

No materials or plant are to be placed on or move through root protection areas.

An Arboricultural Implications Assessment is awaited for trees within 15m of the site works.

Tree Protection Fencing will be erected where identified by this assessment.

3.8. Biodiversity

Generally, risks to local biodiversity from construction are managed through the risk assessment provided in Appendix.

	Activity	Existing Risk (L X S = R)			Mitigation	Residual Risk (L X S = R)		
		L	S	R		L	S	R
Site clearance	Removal or pruning/cutting of trees, shrubs and ground vegetation (e.g. during bird breeding season);	5	5	25	Carry out removal 1st September - 1st March, where this period is extended, ecology method statement Remove vegetation in two stages: (a) Remove to 30cm and leave overnight, (b) Remove remaining within 24 hours (c) Ecology Clerk of Works (ECW) to supervise	0	5	0
	Removal of soil, rubble and other materials	5	1	5	Use dedicated haulage route and public highways	0	1	0
Site set up	Location of site offices, site huts, temporary latrines (including their drainage);	5	4	20	Welfare facilities to be self-contained and emptied off-site All associated works restricted to within the heras fencing	0	4	0
	Temporary storage areas and stockpiles for soils, materials, spoils and waste;	5	3	15	All associated works restricted to within the heras fencing and bunded where necessary	0	3	0
	Site lighting spillage onto neighbouring habitat	5	5	25	Avoid illumination of maintained habitat	0	5	0
	Areas for plant maintenance and for storage of oils, fuels and chemicals;	5	3	15	Provide Construction Phase Environmental Management Plan	0	3	0
	Establishment of haul roads (e.g. construction of rubble or concrete temporary roads);	5	2	10	Provide Construction Phase Environmental Management Plan	0	2	0
	Site fencing (e.g. disruption/severance of animal runs and paths).	5	1	5	Provide egress underneath (200mm x 200mm) at animal path route locations Ecologist to advise path route	0	1	0
Groundworks	Ground investigations, foundations, excavations and piling, temporary earthworks, tunnelling (including the necessary space to operate cranes and large machinery);	5	2	10	Leave escape from trenches, cover wet excavations and pipe apertures	0	2	0
	Installation of underground services (e.g. pipes, electricity, gas, telecommunications cables, foul and surface water drains);	5	2	10	Leave escape from trenches, cover wet excavations and pipe apertures	0	2	0
	Assembly areas for dry trades (e.g. Steel works and reinforcements);	5	1	5	All associated works to be restricted to within the heras fencing	0	1	0
	Assembly areas for wet trades (e.g. Concrete pours and batching).	5	3	15	All associated works to be restricted to within the heras fencing Concrete to be delivered ready-mixed	0	3	0
Marine works	Piling or other works relating to foundations.	5	1	5	Concrete to be delivered ready-mixed	0	1	0
Construction - general	Increase in traffic movements	5	1	5	Driver awareness	0	1	0
	Neighbouring habitat outside the development footprint may be adversely affected.	5	5	25	Heras fencing will delineate the construction footprint	0	5	0
	General construction may impede animal movement throughout the Site	3	2	6	Provide egress underneath fencing (200mm x 200mm) at animal path route locations Works limited to daytime hours	0	2	0
Construction - Drainage	Drainage may decrease off-site water quality	2	4	8	Construction drainage subject to an agreed methodology	0	4	0
	There may be insensitive destruction of waterside habitat to provide outfall(s).	4	5	20	Ecology survey within 48 hours of outfall construction on natural watercourse	0	5	0
Environmental Incidents	Vandalism	4	4	16	24-hour security	0	4	0
	Fires and burning of wastes	1	5	5	Burning piles moved on day of burning	0	5	0
	Pollution (air, water, and ground)	5	5	25	Provide Construction Phase Environmental Management Plan	0	5	0
	Erosion and sediment run-off	5	5	25	Provide Construction Phase Environmental Management Plan Measure water quality	0	5	0
	Accidents (e.g. Fuel leaks and spills).	5	5	25	Provide Construction Phase Environmental Management Plan	0	5	0
Final Site Works	Disposal of wastes, removal of site offices and final site clearance after Construction	5	2	10	Provide Construction Phase Environmental Management Plan	0	2	0

L = likelihood; S = severity; R = risk

However, at this site there are special features to be managed as follows:

Terrestrial invertebrates

The Site is located within close proximity to a Butterfly Conservation Priority Landscape which suggests that the Site and surrounding Survey Area may support a variety of invertebrate species which favour the habitats present and in turn the moorland and grassland plants will rely on insects for pollination including flies, butterflies, moths, bees and wasps. Heather shrubs will provide excellent areas of refuge for invertebrates within drier sections of the Survey Area. Dragonflies and damselflies will likely use bog pools.

Aquatic invertebrates and vertebrates

The Site and Site access may have direct and indirect impacts on aquatic features such as bog pools, minor tributary watercourses and rivers. These habitats have potential to support all life stages of aquatic invertebrates. The sections of Water of Nevis located within the Survey Area are suitable for salmonids however there are natural obstructions downstream of the Site (the Lower Steall Falls and the Upper Steall Falls – several kilometres downstream) which are impassable for migratory fish. As such, any fish present are likely to be resident only. The minor watercourses identified within the Survey Area are considered to be unsuitable for salmonids due to their narrow, steep, discontinuous and ephemeral nature and the lack of suitable spawning gravels.

Amphibians

The Water of Nevis, minor watercourses and occasional bog pools may provide some suitable habitat for common toad and common frog but no signs were recorded. The Site does not provide suitable habitat for newts, including great crested newt owing to the acidic nature of the bog pools. There was only a single pond identified within 500m of the Site from aerial or OS mapping (i.e. the estimated average range of great crested newts from breeding ponds) however this is located south of Water of Nevis and Abhainn Rath which would be impassable to newts restricting connectivity to the Site.

Reptiles

Upland heath, grassland and bog habitats provide suitable habitat to support populations of common reptiles including common lizard, slow worm and adder. The mosaic structure of habitat available within the Survey Area offers good foraging opportunities for reptiles, with shelter available amongst dwarf shrubs.

Birds (winter and breeding)

In general, the Site and Survey Area offers suitability to support ground nesting birds in the breeding season amongst the heathland vegetation and marshy grassland. No active nest sites were identified. The Site and Survey Area do not provide suitable habitat for wintering birds.

Bats

No evidence of bat presence or activity was recorded during the survey. The Water of Nevis provides a linear corridor for foraging and commuting bats. However the remaining open hillside offers less suitable habitat to support bat activity with a lack of features for navigation and cover from predation. Roosting bat habitat on Site was negligible, with an absence of trees or structures with cavities suitable to support roosts.

Otter

Limited suitable resting habitat was recorded within the watercourse habitat identified within the Survey Area, however all watercourses have suitability to support commuting and foraging activities by this species.

Water vole

The Water of Nevis provides suitable habitat for water vole, in the form of grass, rush and sedge species and banks which are suitable for burrowing. There are historic records of water vole within the wider Water of Nevis catchment²³ but the adjacent steep-sided hill slopes and rocky gorges of the Upper Steall Falls may act as a geographical barrier and no signs of this species were recorded within the Survey Area.

Badger

Opportunities for badger sett building were highly limited across the bog habitat within the Survey Area. However, there is potential sett building habitat within the drier habitat located on the slopes of the Survey Area. Across the Site and wider area, suitable foraging habitat for badger is present (i.e. berry rich shrubs and invertebrates). At the time of the survey no field signs for badger were recorded however their presence cannot be ruled out.

Pine marten

No suitable denning habitat to support pine marten was identified within the Site or wider Survey Area and due to the exposed nature of the Site and Survey Area together with the lack of connectivity to optimal habitat, it is unlikely that pine marten would utilise the area regularly for commuting and foraging, however may in the area opportunistically.

Red squirrel

No suitable habitat to support red squirrel is located within the Site or Survey Area.

Wildcat

No evidence of wildcat was recorded during the survey. Wildcat prefer to live on the woodland edge, in the margins of mountains and moorlands, with rough grazing²⁴. They typically avoid high mountain areas with drained moorland.

Other species

Pathways and prints made by red deer were visible across the Survey Area; deer droppings of various ages were also seen. There is a mosaic of suitable habitats for brown hare and mountain hare.

3.9. Cultural Heritage

If any archaeological remains are found to be on site or suspected to be present, stop works and contact the Site Delivery Manager who will refer the matter to the client.

3.10. People & Communities

A prestart meeting is to be held to advise of the potential impacts of the works and key dates.

Daily briefings with the Site Provider will be attempted to update on works for the day, deliveries and to understand Bike Park activities.

If any complaints are received, the Site Delivery Manager will inform the client.

4. Site Specific Aspects & Impacts Register

A site-specific A&I register has been produced using template Clarke Management System form FRM107 Environmental Aspects and Impacts register. The site-specific register will take into account any environmental risks identified by the client for this project.

5. Training

Site staff shall be competent to perform tasks that have the potential to cause a significant environmental impact. Competence is defined in terms of appropriate education, training and experience. Project specific training is required.

Environmental awareness and training shall be achieved by:

Site induction, including relevant environmental issues.

Environmental posters and site notices.

Method statement and risk assessment briefings.

Toolbox talks, including instruction on incident response procedures. Key project specific environmental issues briefings.

All managers and supervisors will be briefed on the Environmental Management Plan.

Evidence of all training, inductions and briefings will be recorded and retained.

Toolbox talks shall be provided to all operatives on site on environmental and ecological sensitivities and to cover any regulator consents (if in place). Daily whiteboard briefings will be given to the site team by the site supervisor. Only suitably trained and qualified operatives shall operate the plant and machinery suited for them. Environmental awareness and methods of works will be a regular topic to ensure it is considered daily. All staff members should be aware of their responsibilities to ensure they do their duties correctly.

Records will be kept in the site file of any environmental incidents on site. Cornerstone will be immediately informed of any such incidents. Clarke Telecoms will be responsible for following up on incidents and keeping track of records. Additionally, all monitoring records will be kept throughout the project. Records of material movements around the site and any imported materials and exported wastes will be kept throughout the project.

6. Nuisance and Pollution Prevention

6.1. Pollution controls – ground, air, water

Dust

Dust will be generated during drilling activities.

This will not be sufficient to cause a nuisance to 3rd parties.

Dust will be damped at source to prevent it becoming airborne.

Concrete Wash Water Plan

Concrete wash water will be retained in a filtered IBC. Additive will be used to reduce the PH of the retained water where required..

Fuel Oil Storage and Refuelling

No fuel will be stored on site. Fuel for mobile mechanical plant will be delivered to site as required by the plant supply company.

Plant nappies will be used for all refuelling operations.

6.2. Identification, management and liaison with Interested and sensitive parties

Clarke Telecom Limited have considered the impact for nuisance outside the site demise and will manage this through liaison with the site provider and daily Revolution Bike Park staff.

The PICW acts as a point of contact to coordinate response to any incident, for example ordering a Site Operative to move a stockpile away from a potential pollution pathway.

Clarke Telecom Limited will respond effectively and quickly to any requests or complaints from neighbours. Log any discussions or contact with neighbours and communities.

7. Waste Management

7.1. Detail of how waste hierarchy will be applied.



7.2. Waste Removal Details

Waste types to arise.

Any hazardous waste streams to be segregated.

Named licenced carriers.

Valid copies of waste carrier licences must be obtained for any company removing waste from site. To be updated as works commence.

Waste Carrier	Waste Carrier Licence Number
Clarke Telecom Limited (Upper Tier)	CBDU105538

Named licenced destinations

A copy of a full and valid Waste Management Licence for any facility the waste is removed to must be obtained. This includes waste and sweepings by road sweepers.

Waste Management Location Name	Permit No.	WML No.

Waste Transfer Notes are to be retained. This includes any waste returned to the Stakehill warehouse for subsequent disposal.

8. Licences, Consents, Permits, Exemptions

Permission from the Environment Agency or the local sewerage provider is required before discharging anything other than clean uncontaminated surface water to a drain and other surface waters or groundwater.

8.1. Details of which approvals apply to works.

No spoil is to be retained on site.
No permits will be required at the site.

8.2. Details of how approval conditions are to be discharged / managed.

No conditions have been stipulated at this site.

9. Historic Environment Controls

N/A

10. Flood Risk Management during construction

Flood risk report awaited for site location.

11. Energy Efficiency during works

Identify areas where efficiencies can be made with particular focus on significant emissions aspects (activities that generate carbon emissions).

Minimise the number of deliveries to
site Use local supplier depots for
site materials

No idling of vehicles or plant in excess of 3 minutes

12. Material Sourcing Strategy

Materials have been procured in compliance with the Clarke Telecom Corporate Social Responsibility Policy.

12.1. Sustainable Materials

Relevant supplier certification is available from Procurement Department:

[CARES Rebar Certification](#)

[FSC Timber Certification](#)

Records to demonstrate a full chain of custody for FSC certified timber products must be retained.

12.2. Grey List Material

Any grey list materials procured must be itemised with justification for sourcing outside the normal channels. **NO GREY LIST MATERIALS HAVE BEEN IDENTIFIED.**

13. Incident Response Plan

Environmental incidents can include spillages (e.g. from oils and chemicals), contaminated surface water run-off, flooding, riverbed disturbance, damage to underground services, damage to habitats and poor waste disposal and storage.

Incident Hotline Numbers:

In Scotland, Northern Ireland and
England call:

0800 80 70 60

(24 hour service)

In Wales call:

0300 065 3000

(Press 1 for 24 hour service)

Incident Response Plan as part of the environmental impact management of your work.
Include the following:

site risks

list of key external and internal contacts (include your environmental regulator, Local Authority, Fire Service)

reporting procedures

**site plan including drainage and location of storage/refuelling areas list of stored materials
details of local environmental sensitivities e.g. abstractors, high amenity areas and fish farms**

location of spill equipment

procedures for spill containment and remediation

Ensure spill kit training has been undertaken by all site operatives.

14. Document Control

Document Control	
Document Title:	Construction Environmental Management Plan
Document ID:	CEMP-02
Revision Number:	2.0
Template Creation:	25/04/23
Template Issued By:	Steve Wilson
Form Number:	
Form Issued:	
Project ID:	SRN
Site Name:	Tom an Eite
Site Address:	Land off Water of Nevis, Mamore Estate, Kinlochleven, Highland, Scotland PH50 4QL
Client:	Cornerstone
Compiled By:	James Swan
Clarke Telecom Project Director:	Richard Appleyard
Clarke Telecom Project Manager:	Jason Borrill

Document Revision Log		
Revision Number:	Date:	Description of Changes:
1.0	27/07/22	CEMP Template Issued
2.0	25/04/23	Project Org updated

Document (Form) Revision Log		
Revision Number:	Date:	Description of Changes:
7.0		
7.1		