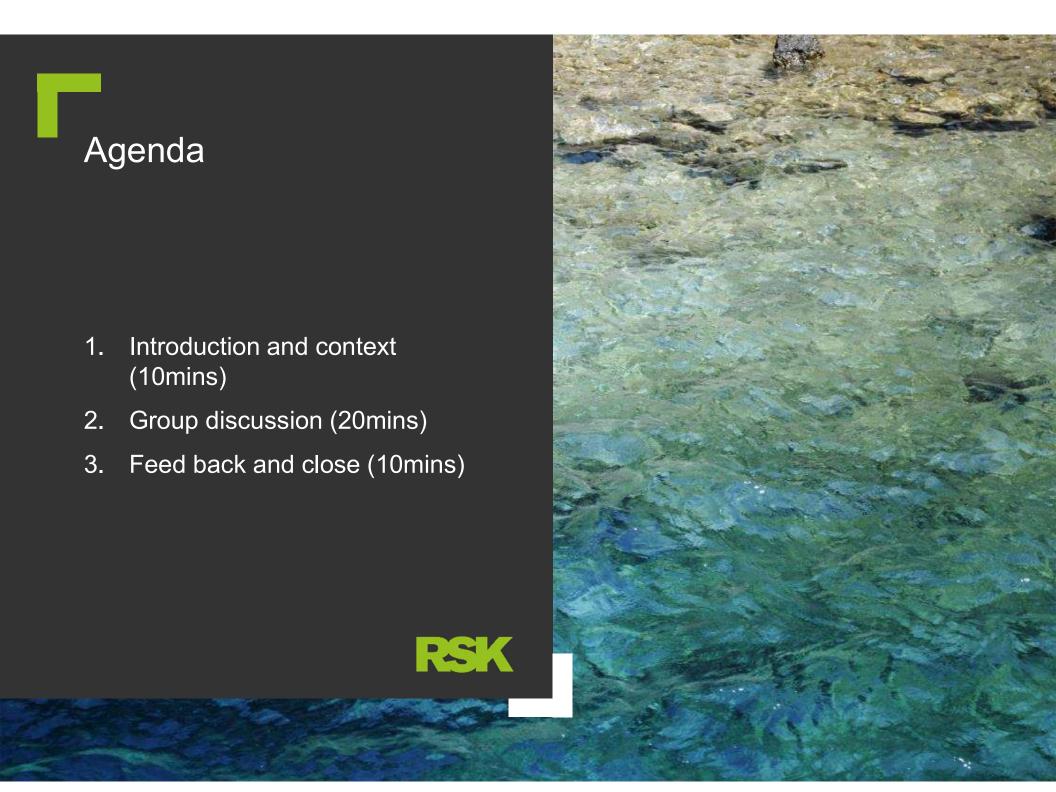


Delivering EIA Mitigation Commitments

Improving what happens after consent is achieved







Introductions

Simon Knott

- 10 years of construction phase environmental support in due diligence and management roles.
- AECoW Management Committee member
- Co-Chair of the AECoW IEMA working group focussed on Post Consent Environmental Performance





Context – Real world data from 1 windfarm in construction over a 36 week period



134 non compliant events.

3.6 new non compliant events a week on average.



Context – Impact Assessment to Contract

Impact Assessment

Consent conditions

Contract

83 Commitments outlined in the Schedule of Environmental Commitments.

16 Chapters of EIA content plus associated supporting documents

3 conditions with direct reference to the Impact Assessment and the various consents and licences 365 pages

5 references to the Impact Assessment report

"The Contractor will be required to comply with the environmental commitments contained within the Environmental Impact Assessment Report (EIAR) and the Habitats Regulations Appraisal (HRA) for the scheme."



Examples of commitments

"Appropriate working methods cognisant of potential ground gas risks will be required to be developed and adopted by the Contractor during below ground site construction works including excavations and piling."

"Installation of temporary treatment facilities to protect water quality and promote flow attenuation during construction following CIRIA's guidance including C648 (CIRIA 2006a) and C744 (CIRIA 2015c) and compliance with GBR 10 of The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended) (CAR)."

"A suitably qualified ECoW would be employed for the duration of the construction and reinstatement periods, to ensure ecological interests are safeguarded, although this may not necessarily be a full-time role throughout"



Examples of commitments

"As part of the CEMP, the Contractor should incorporate energy efficiency and carbon reduction measures on site where practicable."

"Vegetation cover would be re-established as quickly as possible on track verges, screening bunds and cut slopes, by relaying of excavated soil turves and peat acrotelm, to improve slope stability and provide erosion protection. Additional methods, including hydroseeding and/or use of a biodegradable geotextile, would be considered, if necessary"

"Compliance with the conditions of the Marine licence, CSL (if required) and any CAR authorisation (if required)."



Typical construction issues

"No excavation works would begin until cut-off drains and sediment protection (silt fencing and/or pegged straw bales, as appropriate) have been installed between the construction works and the direct flow paths towards the supply source."







Typical construction issues

"Vegetation cover would be re-established as quickly as possible on track verges, screening bunds and cut slopes, by relaying of excavated soil turves and peat acrotelm, to improve slope stability and provide erosion protection.

Additional methods, including hydroseeding and/or use of a biodegradable geotextile, would be considered, if necessary"





Discussion

What are the challenges associated with delivering Impact Assessment commitments?

How can Impact Assessment improve construction phase performance?



Feed back and close















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