

		<h1 style="text-align: center;">Environmental and Social Management Plan - Scotland</h1>	
		<p>Title: CP7 Erbusaig Bay QTS/ESMP/CS24-175 - Rev 002</p>	
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1. Purpose

This Environmental & Social Management Plan (ESMP) has been produced by QTS Group Ltd. This ESMP translates and complies with the requirements of Network Rail and all Statutory and regulatory requirements. The ESMP describes how environmental and social issues arising from the Project Works are to be managed, mitigated and seeks to aid the commitment for continual improvement in environmental and social performance in accordance with contract requirements.

This ESMP is intended to meet the requirements of the International Management System ISO 14001.

This ESMP has been produced for the QTS Group and refers to procedures of the QTS Group and its partners.

The procedures contained within this plan do not prejudice any statutory/contract requirements and guidelines that may be in force during the contract lie. Any such contract requirements are to be read in conjunction with this plan. This ESMP and QTS Group environmental procedures are to be utilised on any works undertaken as part of the project. Procedures to be used during the course of the contract are referenced in the works. This document is to be used as a helpful and constant reference allowing the staff and management team concerned to complete the works with as little impact on the environment as practicably possible.

Note that some sections of this document will be deliberately left blank since the plan is structured to encompass many different aspects of work, not all of which will be applicable in every project.

The plan defines the scope of environmental and social issues (including an environmental risk assessment), together with the requirements for action by the QTS Group. These shall be set out in the Works Package Plan (WPP), in line with the requirements of all environmental mitigation documents and in particular the Code of Construction Practice (CoCP).

The Plan sets out the individual responsibilities of the Operation Manager, Project Manager, Supervisors and Operatives, with their respective roles defined in a clear system of managerial control.

The Plan establishes the structure and content for the procedures to monitor compliance, including specific formal auditing by interested parties.

The Plan establishes a regular procedure for reporting environmental and social information quarterly and to ensure that any issues are firmly on the agenda of progress review meetings.

The Plan ensures that complete documented records for every period are maintained for easy and accessible reference.

The Plan provides evidence to statutory agencies and the Local Authorities that QTS Group is taking effective action to work safely comply with all statutory requirements in order to protect the environment.

2. Summary

2.1 Project Description/Scope of Works

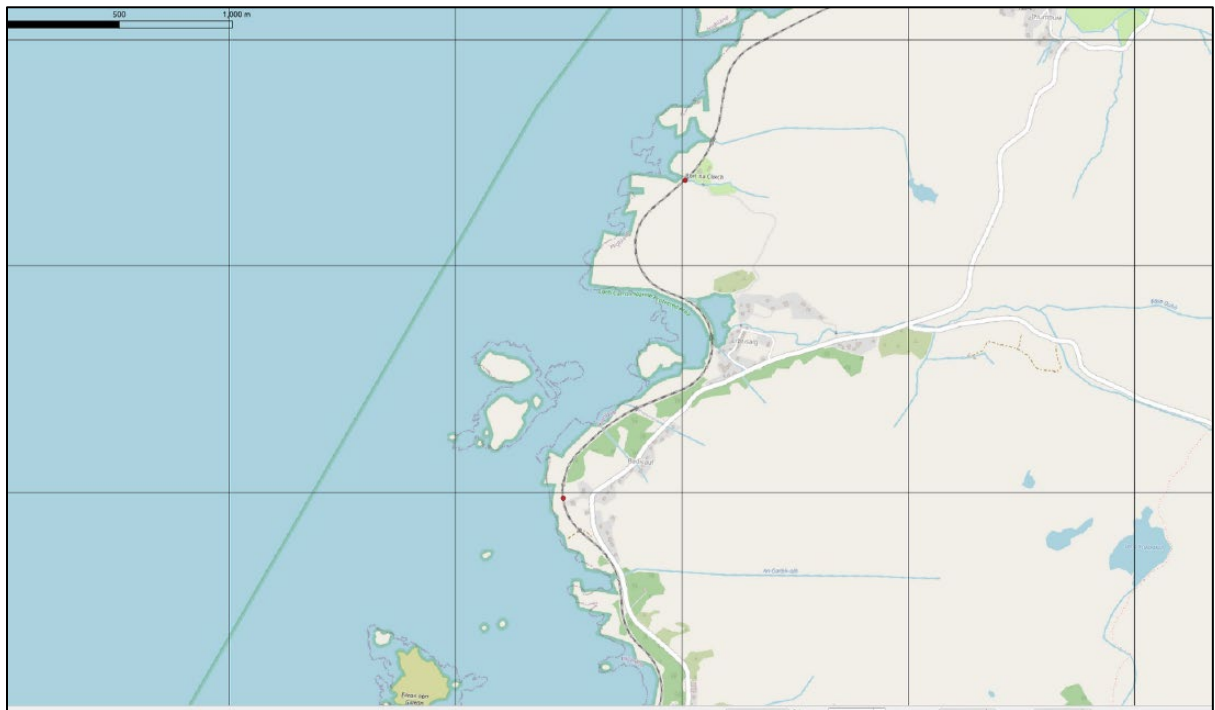
- Installation of compound/handling area
- Clearance of vegetation
- Scaling operations
- Installation of top and bottom anchors
- Installation of reinforcement dowels
- Installation of rockfall containment netting
- Installation of light weight catch fencing
- Installation of Stonefill Regarde
- Anchor Testing
- Demobilise from site

2.2 Site Location & Plan

The work site is located on the Kyle rail line, between Kyle of Lochalsh Station and Duirinish Station, along the coast between Badicaul and Portnacloich. There are many dwelling houses located within 500 metres of the worksite. The landscape surrounding the work site is a rough pasture and heath, with rock outcrops and scattered scrub and trees. The worksite comprises two rock cuttings on the both sides of the railway.

The work site is approx. 2010 metres long covering an area of approx. 3.01 hectares. The approx. elevation of the site is 15 metres AOD.

The work site lies within Highland planning authority.



2.3 Contact Details

Individuals responsible for Environmental & Social Management on site.

Contact Name:	Dom Curran	John Horn	Nicola Dalby	Cameron Couston
Job Title:	Site Agent	Site Manager	Compliance Manager	Environmental Advisor
Email Address:	dominiccurran@qtsgroup.com	johnhorn@qtsgroup.com	nicoladalby@qtsgroup.com	cameroncouston@qtsgroup.com
Contact Number:	[Redacted]	[Redacted]	[Redacted]	[Redacted]

2.4 Summary & Action Plan of Key Environmental & Social Risks & Opportunities

Key Environmental Risks & Opportunities as identified in the ESRA				
Activity/ Area	Risk/ Opportunity	Description	Action/ Control	Responsibility
Pollution	Risk	Spills	Spill kits with all vans and machines	Site Manager All operatives on site
Ecology	Risk	Possible Protected Species, especially bats, reptiles & otters	Operatives made aware of the risk and have been advised to be vigilant.	Site Manager All operatives on site
Ecology	Risk	Badgers	Operators must remain vigilant for the following protected species when undertaking the works.	Site Manager All operatives on site
Ecology	Risk	Bird Nesting	Bird nest checks done before shifts throughout the work	Site Manager All operatives on site

Ecology	Opportunity	Increase forage for pollinators	Use grass and clover or wildflower mix for any reseeding works.	Site Manager All operatives on site
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Key Social Risks & Opportunities as identified in the ESRA				
Activity/ Area	Risk/ Opportunity	Description	Action/ Control	Responsibility
Neighbouring Disturbance	Risk	Light disturbance	Operatives instructed to set up lighting appropriately facing away in the WPP	Site Manager All operatives on site
Neighbouring Disturbance	Risk	Noise disturbance	Work scheduled during unsociable hours is kept to a minimum	Site Manager All operatives on site
Community relations	Opportunity	Improve community relations	Good communications and improvements made to adjoining land	Site Manager All operatives on site

3. GENERAL REQUIREMENTS

3.1 Environmental & Social Policies

The QTS Group Environmental Policy is presented in Appendix A Part I. The QTS Group is committed to minimising the environmental impacts of its activities and will address issues as an integral part of its management process. The QTS Group itself will endorse any positive move towards reducing the overall impact on the environment as part of the effort throughout the railway industry. The QTS Group is committed to supporting and complying with Network Rail’s Environmental Policy.

The QTS Group Social Policy is presented in Appendix A Part II. The QTS Group recognises that working with clients, partner businesses, suppliers and contractors will benefit all parties and enhance efficiencies, services to our clients and competitiveness. We have an established culture of innovation, partnership working and co-operation with all parties to achieve mutual goals. We also strive for early and amical resolution of conflicts.

3.2 Compliance Obligations

The Project Manager shall develop an audit plan to monitor environmental and social compliance. The audits will be used to establish the suitability and effectiveness of the management systems.

Audits and site inspections will be carried out by trained personnel in accordance with QTS Group procedures. The audits will be scheduled on a basis of their importance and will be included in a programme approved by the Project Manager. The programme will be monitored and reported against by the Project Manager. Copies of all audits will be made available to the QTS Group Compliance Director.

The results of the audits will be analysed on a regular basis as a means of detecting any trends in observations and promoting preventative actions.

Project Environmental Key Performance Indicators issued by the QTS Group environmental management team will be incorporated into audits; these shall include the following objectives:

- Zero abatement notices served.
- 100% of all complaints are responded to within 5 days.
- All contaminated land clean-ups are reported.

Site inspections and checks shall be carried out during the course of the works.

These are essential in maintaining a consistent level of environmental and social performance and compliance with the work package plan. The items to check shall include:

- Adherence to the environmental considerations listed in the Work Package Plans
- Evidence that the work package plan has been briefed to the site workforce.
- Certificates of competence and environmental awareness for plant operators/supervisors
- Evidence of paperwork being collected for the necessary practices, e.g. Waste Transfer Notes and Consignment Notes.

The Project Manager shall review the QTS Group ESMP when significant changes take place.

Non-compliance and corrective action will be handled in accordance with the QTS Group procedure for Control of Non-conformities (MP11) and reported to Network Rail and the PMO on a regular basis.

3.3 Permits, Licenses & Consents

Local authority: Highland planning authority.

The proposed works are located both within the railway boundary. The site compound is wholly located on 3rd party land with a documented agreement in place with the landowner.

Noise: Highland planning authority EHO

The majority of the works are to be carried out during night shift possessions. Properties immediately adjacent to the works that will be affected by noise will be notified by letter at least two weeks prior to night shift works commencing. The local EHO will be informed of the works, however it is not anticipated that any licence application will be required for these works.

Tree Preservation Orders: Highland planning authority.

All tree felling works are located within the railway boundary and not subject to any TPO or conservation area designations.

Wildlife: NatureScot

Contact NatureScot should any protected species be found to be present. No species of concern was noted on site during the survey; however, operatives are advised to remain vigilant for reptiles especially.

Water: Scottish Environmental Protection Agency (SEPA)

Liaison will be maintained with SEPA when required.

Water: Scottish Government Marine Laboratories

Application has been submitted for a full Marine License, this shall be for the embankment stabilisation works at Erbusaig Bay.

Ancient Monuments: Historic Scotland

No areas of concern have been identified within the footprint of the site or working areas, there are areas within the vicinity but not affected by the works.

Protected Sites: NatureScot

No areas of concern have been identified within the footprint of the site or working areas, there are areas within the vicinity but not affected by the works.

3.4 Roles & Responsibilities

The QTS Group Organisation Chart is available on request:

All Staff

- Work in accordance with this plan and the relevant QTS Group Generic and Site-Specific Work Package Plans and pre-work briefings.
- Only undertake work for which they are competent and, as required, have with them a valid certificate of competency.
- Identify and report any accidents and incidents which, however small, have an impact on the environment or the general Health and Safety of their team members.
- Co-operate with the customer to ensure adherence to legal and contractual requirements.
- Ensure they do not recklessly or intentionally interfere with or misuse anything in the interests of the environment.
- Whilst working on site, ensure that visible identification is always carried.

Operations Manager

- Ensure that the strategies and mechanisms stated by this QTS Group ESMP are adopted into the activities undertaken by the QTS Group.
- Ensure that staff briefings are delivered in order for all personnel to become environmentally and socially aware.
- Approve the QTS Group ESMP (including amendments) and considering any recommendations or targets as a result of its review.

Site Manager

- Ensure that incidents are reported to the Network Rail WICC & Project Manager
- Ensure that the QTS Group ESMP meets the client and project requirements.
- Act as a source of expert advice and support in relation to environmental and social issues.
- Ensure that the relevant managers are aware of the level of training or briefing required for them to fulfil the requirements of the ESMP.
- Identify training needs of staff causing an environmental impact associated with the works.
- Ensure that the QTS Group personnel (and sub-contractors) carry adequate equipment for the prevention of pollution.
- Implement, maintain and update of the ESMP
- Audit/checks against this ESMP and Alliance Environmental Policies and Procedures.
- Review of Generic and Site-Specific Work Package Plans.
- Investigate all significant environmental incidents and ensure reports are made.

Contractor's Engineering Manager and CRE

- The main contractor will take the role of Engineering Manager and will be responsible in all issues relating to the project.

Site Supervisor

- Ensure that when work is allocated on site that staff are competent to undertake the works designated.
- Ensure that where applicable the toolbox talks concerning the relevant environmental and social impacts have been addressed to the persons involved.
- Ensure that the work conforms to any consents, agreements, contract requirements or constraints valid at the time of the works.
- Ensure that adequate protection is always applied to minimise harm to the environment as a result of the works.
- Ensure that any work carried out is in accordance with the environmental protection arrangements specified in this ESMP and associated mitigation complies with the Generic and Site-Specific Work Package Plans.
- Report environmental incidents to Network Rails WICC and Project Manager, and in line with Section 7.
- Regular inspection of the waste facilities utilised by the staff to ensure no mixing of waste is taking place and the vessels are being used as originally intended.

Environmental Team

- Ensure compliance of environmental procedures within QTS
- Ensure compliance in terms of environmental management with regulations and Network Rail Standards.
- Undertake and assist into environmental incident investigations.
- Perform environmental audits and inspections of sites.
- Review of the ESMP

3.5 Competences

QTS hold competencies for all employees and can be made available upon request.

All QTS sponsored staff undergo an environmental induction prior to sponsorship to ensure a baseline knowledge is established before they begin working.

QTS competencies are maintained on the QTS Skills ID Database. Project and Site managers allocate staff to the works to ensure that the competence requirements are met.

QTS management procedure MP05 outlines job descriptions and competency requirements.

Role	Name	Competence	Professional Membership
QTS Environmental Advisor	Cameron Couston	Environmental Degree	PIEMA
External Environmental Advisors	Landlab	Chartered Landscape Architects	Chartered Landscape Institute
All Staff		Environmental Awareness	N/A

3.6 Objectives & Targets

An integral part of the Environmental Management System is a commitment to continually improve our environmental performance. Specific Objectives and Targets relating to this contract are detailed below: Further contract specific environmental and social objectives may be set following formal contract award.

Subject	Target	Timeframe	Responsibility
Minimise wildlife disturbance	No licensable activities carried out without prior assessment and consent obtained	Length of project	Project and site managers
Pollution incidents	Zero pollution incidents	Length of project	Project manager and all operatives
Noise complaints	Zero complaints	Length of project	Project manager and all operatives
Minimise Waste	Recycle 95% of waste occurred. All felled vegetation cut, chipped and spread on site or removed for recycling or fuel use. Ongoing monitoring and control of all waste management by QTS	Length of project	Project manager

The objectives will be reviewed and monitored in accordance with the QTS Group Management Procedure on company objectives and targets (MP03).

3.7 Key Performance Indicators

Every period the QTS Group will report to the Client or Network Rail as appropriate on relevant environmental Key Performance Indicators (KPI).

KPI information is collected and analysed in accordance with QTS’ ISO management procedures, with the analysis maintained at Head Office.

Subject	KPI	Reporting platform	Responsibility	Monitoring arrangements
Environmental Incidents	Number of incidents	Email	Project Manager	Incidents logged.
Waste Removed from Site	Tonnes of waste	Email	Project Manager	Waste transfer note
Noise Complaints	Number of complaints	Email	Project Manger	Complaints logged.

3.8 Stakeholder Management

List of Stakeholders	Methods of Engagement
Local authorities	Continued legal compliance. Notifications of works to EHO Planning consent applications where applicable
Environmental regulators	Continued legal compliance. Any site permits acquired
Schools	Notification letters in advance of the works if possibility of disturbance Liaison and information visits
General public	Site information boards

	<p>Site/Community Noticeboards All complaints logged and written complaints are formally answered within 5 days. Any sites located on/adjacent to third party lines will be signposted with warnings</p>
Local businesses	Notification letters in advance of the works if possibility of disturbance
Lineside neighbours	Notification letters in advance of the works if possibility of disturbance
Passengers	No disruption to train schedules
Client	Regular meetings for updates

3.9 Internal Communication

Communication is in accordance with the QTS Management Procedure MP07 Communications.

Plans and briefings are prepared and approved, and all staff (including subcontractor’s employees) are inducted prior to commencing work. These briefings include the Environmental & Social Management Plan, Environmental Risk Assessment and associated control measures.

Documents will be displayed in site offices where these are provided for the works. The project manager will update the plan and briefing documents as required during the works and will arrange for all staff to be briefed on the updated plans.

3.9.1 Toolbox Talks

QTS Group will send out weekly toolbox talks to be briefed and signed by employees. At least once a month the toolbox talk will be environmentally/socially themed. The briefing records will be recorded in compliance.

3.10 External Communications

The QTS Group has developed a Communication and Liaison procedure and has a dedicated member of staff appointed as contract Community Liaison officer (CCLO). QTS Group is committed to supporting Network Rail’s Project Communication Strategy e.g. attendance at Project Community Forums. Issues addressed include complaints handling, communication, liaison and consultation with all affected residents, landowners, statutory agencies and other interested parties.

Public interfaces will be managed in line with:

- Code of Construction Practice (CoCP)

- Guide to liaison, public information and complaints
- Site Senior personnel will carry cards with Network Rails’ Helpline number **0345 711 4141** and will direct all public enquiries there.

3.11 Records & Documents

The person responsible for managing the Contract Environmental Management System shall maintain an environmental file. This will contain a copy of this ESMP and each subsequent update or amendment. It will also contain or indicate the location of the following records to verify environmental compliance:

- Details of any reported failures to comply with the ESMP, and corrective actions taken.
- Environmental accident and incident reports, and corrective actions taken.
- Controlled waste transfer notes (kept at QTS Head Office, Rench Farm).
- Special waste consignment notes (kept at QTS Head Office, Rench Farm).
- Details of any reported complaints and follow up action taken.
- Correspondence with enforcing authorities.
- Consignment notes for the disposal of material for recycling or refurbishment.
- Notifications to the public of general disturbance.
- KPI information supplied to Network Rail.

All records shall be retained during the life of the contract and archived with the contract files.

3.12 Monitoring & Assurance

The audits will be scheduled on a basis of their importance and will be included in a programme approved by the Project Manager. The programme will be monitored and reported against by the Project Manager. Copies of all audits will be made available to the QTS Group Compliance Director.

The results of the audits will be analysed on a regular basis as a means of detecting any trends in observations and promoting preventative actions.

3.13 Tax Allowances & Rebates

Possible rebates, payment or incentives
N/A

4. Environmental & Social Risk Assessment

Environmental and social risk assessment presented in Appendix C & D.

5. Environmental Impact Areas

5.1 Biodiversity

5.1.1 Planning & Managing Biodiversity Risk

- The Preliminary Ecological Appraisal was carried at the Erbusaig Bay site in March 2024
- Reptiles - The loose rock, ballast, scrub, rough grassland and tall ruderal habitat present on site has good potential for Scottish native reptiles. Adder, slow worm and common lizard are protected from being killed, injured or sold under Schedule 5 of the Wildlife and Countryside Act (1981). Precautionary measures are recommended, as set out in the report below and in accordance with Scottish Forestry Guidance.

- **Harbour Seal Designated Haul Out Sites:
WSC-004 - Kishorn Island & Strome Islands
WSC-002 – Pabay & Ardnish Peninsula.**

These two sites are designated harbour seal *Phoca vitulina* haul out sites under The Protection of Seals (Designation of Haul-Out Sites) (Scotland) Order 2014. The designated areas cover: North east of Plockton, the entire islands of Kishorn Island, An Garbh-eilean, Sgeir an Fheoir, Sgeir Buidhe, Eilean na Creige Duibhe, Ulluva, Eilean an-t-Stratha, Strome Islands and associated rocky outcrops, including those between Sgeir Bhuidhe and Eilean a Chairt, those between Eilean a Chairt and Eilean an-t-Stratha and those between An Garbh-eilean and the mainland.

West of Kyle of Lochalsh, intertidal sandbanks and rocky outcrops surrounding Pabay, the entire islands of Sgeir Gobhlach and Sgeir Dubh and intertidal sandbanks and rocky outcrops along the coastline of Ardnish between Rubh Achadha' Chuirn and Broadford airstrip.

The nearest designated haul out site is approx. 7500 metres from the proposed work site.

- Bird Nesting surveys will be carried out prior to and during the works. Any trees found with nests present will be retained undisturbed until the birds have fledged, and the nests are vacant before felling. Pre-works inspections will be carried out for other species that may be present including Bats. The control methods to prevent disturbance are detailed in the work package plans. All staff will be briefed on the protected species which may be present on the site and adjoining land, and the response to be taken should any of these species be found in the work areas.

- Otter *Lutra lutra* is a European Protected Species protected under the Habitat Regulations 1994 and the Wildlife and Countryside Act 1981. Both the species and their places of shelter are protected. At the time of survey no evidence of otter activity was found within or near the worksite, such as spraint, paths, footprints, feeding remains, couching or holting.
- Coastal habitat along the railway corridor is considered to be excellent otter habitat. Subject to further survey, it is assumed otter are present in the surrounding landscape and may pass through the work site when commuting in the area. Otters need fresh water to wash off salt water. Resting places of otters using coastal habitats are located near fresh water sources. In particular holt sites, and especially natal holts are strongly associated with freshwater pools. More detailed studies of otter behaviour on similar landscapes (rocky shorelines with freshwater streams), show foraging / hunting activity concentrated in the intertidal zone of the shore, and resting activity concentrated along the freshwater streams inland (Kruuk 2006).
There are no suitable freshwater streams along the shoreline in the vicinity of the work site, except at the village of Erbusaig, where houses surround a small burn, which is not considered suitable for otter holts or couches within 30 metres of the work site. So, the presence of otter holts and couches within 30 metres of the work site is considered highly unlikely.

A toolbox talk for otter is recommended.

5.1.2 Biodiversity Accounting

(Required for any works with a construction value over £20,000 or a footprint greater than 1500m²)

	Biodiversity Units
Before Work	
After Work	
Offset	

5.2 Contaminated Land

No areas of contaminated land have been advised in the initial work scope. Excavated material not retained on site will be transported to a licenced facility. WAC testing will take place to satisfy the licenced facility of the suitability of the material being accepted. The ballast and underlying formation may be contaminated with hydrocarbons from the operational railway, however due to the site being clear of areas where trains stand idle, such contamination is unlikely to be significant. Past use of the land may have resulted in contamination of soils and there is a slight risk that this could be uncovered during the works.

All staff will be briefed and where necessary receive further training on asbestos awareness.

In the event of discovery of unexpected, contaminated land, the Network Rail Project Manager and SEPA will be informed and works suspended in the immediate area until agreement is reached with the Project Manager and statutory bodies on the methods for the continuance of the works.

5.3 Emissions to Air

Type	Nature	Quantity
Exhaust emissions	Exhaust emissions from vehicles, plant and machinery	Not directly measured

Sensitive Receptors	Mitigation
Woodland and water courses	All vehicles/machinery not in use will be turned off and nothing left idling

5.4 Carbon

5.4.1 Infrastructure Carbon

This section is not applicable to this project as no assets are required that produce carbon during its lifecycle.

5.4.2 Capital Carbon

Works Below £1 Million do not require opportunities for carbon reduction to be produced.

Any works over £1 Million and encompass track, structures, geotechnical/earthworks, electrification, fixed plant infrastructure or buildings will require the Network Rail ‘Rail Carbon Tool’ in order to identify opportunities for carbon reduction and use this data to influence the low carbon design and carbon efficient construction method decision.

Works below £1 million

5.4.3 Energy & Operational Carbon

This section is not applicable to this project as no assets are required that produce carbon during its lifecycle.

5.5 Circular Economy

Where design works are undertaken then materials selection will include opportunities for reuse and recycling at the end of life. Information of waste produced by the project is developed further in section 5.9 and in the corresponding Waste Management Plan (WMP.)

Materials Proposed	Reuse/Recycling Opportunities
Containment netting	Recycle waste materials

5.6 Materials

5.6.1 Responsibly Sourced Timber

Materials used or consumed by plant and machinery will be sourced from approved suppliers in accordance with QTS’ policies and ISO procedures. The suppliers must provide FSC or PEFC certification in order to become approved and these certifications are saved in procurement.

Material to be incorporated into the works will be of a standard pattern and specification, and surplus materials will be returned to QTS stores for use on future works. Materials will be ordered through QTS central purchasing department and issued through stores at Drumclog. Loose or large materials will be delivered directly to the site compound and stored until required for use. Materials shall be sourced from QTS approved suppliers, and sustainable sources and chain of custody will be used where available in preference to non-sustainable or non-auditable sources.

5.6.2 Concretes & Aggregates*

The table below should be completed for all projects which use greater than 50 tonnes.

Type of Concrete/Aggregates	Quantity	Target for proportional of responsibly sourced material (% by weight)
N/A		

*Excludes Rail Ballast

5.6.3 Low Environmental Impact Products

Materials with Harmful Constitutes	Substitutes

N/A	
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5.6.4 Herbicides

QTS Group is committed to comply with the Management of Lineside Vegetation Standard (NR/L2/TRK/5201.)

The Table below shall be filled in if applicable to the work planned.

Herbicides/Pesticides Used	Application Plan
Eco Plugs	Stump treatment where required
Glyphosate	Treatment of Giant Hogweed

5.7 Noise, Nuisance & Disturbance

5.7.1 Noise & Vibration

We have identified the impacts associated with the work and specified measures to minimise disturbance as far as reasonably practicable. This is intended to guide the development of Site-specific Work Package Plans (WPPs). These WPPs will contain the detailed approach to managing noise and vibration at the various working areas.

QTS Group is committed to use the Best Practicable Means (BMP) with regard to controlling the effects of Noise and Vibration. The primary measures required to conform to the standards of Best Practicable Means shall be consistent with those given in BS 5228 (Part 1) Noise Control on Constitution and Open Sites, which is an approved Code of Practice under the Control of Pollution Act 1974. These measures shall include, but not limited to:

Working Methods/Site Management

- Careful selection of plant, construction methods, and programming will be undertaken to minimise noise and vibration impacts.
- Personnel need to be instructed on BPM measures to reduce noise and vibration as part of their induction training.
- Shouting and raised voices shall be kept to a minimum, except in all cases where warnings of danger must be given.

Plant and Equipment

- Modern, silenced and well-maintained plant and equipment fitted with efficient attenuators, mufflers or acoustic covers, where appropriate, will be used at all times. All relevant plant and equipment will be expected to meet the noise limit and noise marking requirements prescribed by the Noise Emissions in the Environment by Equipment for Use Outdoors Regulations, 2001, implementing EU Directive 2000 14/EC.

- Engine compartments will be closed when equipment is in use.
- Static equipment will be sited and orientated as far as is reasonably practicable away from occupied buildings and may require localised screening.
- All equipment and site vehicles will be switched off when not in use.
- All plant shall conform to the Construction Plant and Equipment (Harmonisation of Noise) Regulations 1985 and amendments 1988 and 1995.
- Plant shall be maintained in accordance with Manufacturer’s/Supplier’s instructions, to ensure it continues to operate at its lowest sound level. Records shall be kept of plant maintenance.
- Impact noise shall be reduced as far as reasonably practicable by careful handling of materials.

With respect to ground-borne vibration levels, generated through construction activities, no discernible vibration will be generated during the planned works beyond the site boundary.

5.7.2 Light Disturbance

Where lighting is utilised to carry out the works, any receptors identified at the planning stage will be issued with notices describing the proposed work and timescales. Lighting will be directed at the worksite with appropriate lighting units selected to minimise the impact on neighbours while ensuring sufficient light for the works to be carried out safely.

Estimations of lumens and ambient light:

The following table should be filled in for all works.

Sensitive receptors	Control Measures
Surrounding Neighbours	Work being done during daylight, when possible, if not lights will be positioned away from sensitive receptors
Wildlife	Any lights on site will be facing away from any potential roosts/nests if possible

5.7.3 Odour Management

Odour Emissions Processes	Sensitive Receptors	Controls
N/A		
Monitoring Arrangements (If Required)	N/A	

5.7.4 Dust Management

Dust Emissions Processes	Sensitive Receptors	Controls
Rock Drilling – Installation of rock anchors	Water course, lineside neighbours, woodlands	Water suppression shall be utilised.
Monitoring Arrangements (If Required)	N/A	

5.8 Pollution of Land/Water

The works package plan will detail the control methods necessary to avoid pollution of watercourses and surface/ground water during works.

No new temporary or permanent connections will be made to any mains, drains, pipes, watercourses or other services.

- All potentially polluting liquids in large volumes, including any tanks with more than 200 litres of oil or fuel will be stored in bunded tanks with bunds, drip trays and all hoses will be kept within the bund.
- Diesel generators or static plant brought to site will be equipped with drip trays or plant nappies.
- Arising and chippings will be kept clear of all site drainage features.
- Plant will only be refuelled and maintained on designed areas of hardstanding.

Provisions will be made for the control of any hazardous substances being used, stored or handled in accordance with the COSHH Regulations.

Any tanks containing potentially polluting liquids will be inspected on a weekly basis.

5.9 Waste

All waste will be dealt with under the Environmental Protection Act 1990, with disposal being conducted through companies licenced by the Local Authority under the Duty of Care arrangements. The Act requires that sufficient written description of the waste products be provided. Waste will be managed according to the Project Waste Management Plan (WPM) and all environmental commitments, and in accordance with the QTS Group Environmental and Ecological Training Module.

Potential waste streams to emerge as a result of the functioning of the contract are:

Waste Type	European Waste Catalogue Description	EWC Code	Classification
General Waste	Mixed municipal	20 03 01	Controlled
Paper	Mixed municipal	20 01 01	Controlled
Rocks/Soils	Construction & Demolition	17.05.04	Controlled
Vegetation	Plant Tissue	02.01.03	Controlled
Asbestos	Construction materials containing asbestos	17.06.05	Special
Contaminated ballast and formation	Ballast with dangerous substances	17.05.07	Special
Metal containers (contaminated)	Metallic wastes hazardous	02.01.08	Special

The QTS Group is committed to managing waste responsibility and in line with the principles and hierarchy specified in the project WMP. For timber and vegetation this is as follows:

- Biomass
- Composting
- Other off-site uses
- On site chipping and spreading

Considerations in deciding the most appropriate method of waste management will include:

- Suitability of material (e.g. water content, size, type etc.)
- Haulage distances to potential end user and associated disruption and environmental effects.
- On-site logistics

Authorised Waste Carriers

- Disposal where required will be by authorised Waste Carriers only. The waste carrier to be used is QTS Group – (Registration No. SWE/019392) except if special waste is encountered when a specialised carrier will be employed.

Duty of Care

The QTS Group has a Duty of Care under the Environmental Protection Act 1990 Part 2 to take reasonable measures to:

- Prevent others from treating waste unlawfully or in a manner likely to cause pollution or harm to health.

- Prevent the escape of waste from their control and the control of others. This should include action to prevent:
 - ⇒ Corrosion or wear of waste containers.
 - ⇒ Accidental spilling or leaking.
 - ⇒ Waste containers breaking open by accident or weathering allowing the waste to escape.
 - ⇒ Waste blowing away or falling while in store or being transported.
 - ⇒ Scavenging of waste by vandals, thieves, children, trespassers or animals.

- Ensure that sufficient written description is transferred with the waste, which will enable the other person to avoid a contravention of section 33 of the Environmental Protection Act and to comply with the Duty of Care. The written description is to include:
 - ⇒ The quantity of waste
 - ⇒ How the waste is packaged
 - ⇒ State if the waste is in loose form or in a container.
 - ⇒ If in a container, then state what kind of container.
 - ⇒ A description of the waste

- All excavated material will be stockpiled within the site compound and removed from site by grab lorry.
- Any general waste created by the ops will be categorised into general, paper, plastic bagged up, removed from site and disposed of via the recycle station at QTS Group HQ, Rench Farm.

The overall project is for greater than 90% of waste taken off site to be recycled or re-used.

5.10 Weather Resilience & Climate Change Adaption

N/A for this project

5.11 Sustainable Travel

QTS require procurement forms to be completed prior to the purchase of vehicles that encourage comparing similar vehicles CO2 output and mpg in order to make a more sustainable decision.

The sustainable travel hierarchy will be considered in terms of transport to and from sites. Where possible vehicle sharing will be enforced, in order to reduce the number of vehicles on site and carbon emissions. Once vehicles are parked, travel by foot to and from the lineside is encouraged to limit vehicles being taken on site. Portable electric vehicle chargers can be requested in order to facilitate the use of electric/hybrid vehicles used by staff.

5.12 Water Resources

The Designer/Contractor shall not rely on any permanent connections to existing water supply or drainage infrastructure without agreement in writing from the Employer and the relevant regional regulator/statutory undertaker.

The Designer/Contractor shall reduce construction and operational water consumption to ALARP, including specifying water efficient plant and equipment. For high use water services when supply pipes are above 32mm in diameter the design shall put forward the case for selecting best practice water efficiency standards.

The Designers/Contractor shall assess the scope and business case for reducing dependence on potable water for low grade non-potable uses, including any substantial water consuming processes.

Where the design proposes abstraction of ground water as a supplementary operational water source, the Designer shall assess the impact on any existing abstraction or impoundment licences or requirements for new licences. The Designer shall coordinate the time, information and resources to successfully complete applications for new or modified abstraction licences.

The Contractor shall procure and install fixed water/drainage services in accordance with the design specification. Provide the Employer with a commissioning plan to verify that key services are operating within permitted performance limits.

6. Social Impact Areas

6.1 Being a Caring Neighbour & Stakeholder Engagement Plan

List of Stakeholders	Methods of Engagement
Lineside neighbours	Noise notification letters in advance of the works

Nominated Person for Community Relations:

Name: Community Relations Team, Scotland

Telephone: 03557 11 41 41

Email: www.networkrail.co.uk/contactus

Role Includes:

- Briefing all staff about acceptable conduct
- Overseeing the delivery of notification letters
- Providing the Network Rail community relations representatives with any information they require in relation to the works.

Any design specifications that have been altered to consider noise, visual or historical impacts:

- N/A

Community Projects:

- N/A

Notification Methods Used:

- Email/Letter & Telephone

6.2 Connecting Communities with the Environment

Increased safety risks of lineside vegetation removal:

- Improved access for trespassers
- Soil instability

No vegetation will be removed to be replaced by any visually prominent structures.

6.3 Creating Industry Partnerships & Engaged Employees

The designer/contractor shall read and comply with NR's behaviours and Code of Business Ethics, available on Safety Central

The Designer/Contractor shall use Speak Out, NR's reporting service, for reporting concerns, suspicions or knowledge of wrongdoing taking place in NR. They can be contacted by phoning 0808 143 0100 or visiting www.intouchfeedback.com/networkrail

The Designer/Contractor shall comply with NR's anti-slavery and human trafficking policy, available on the NR website, and complete training if requested by the Employer.

The Designer/Contractor shall complete any equality, diversity and inclusion training if requested by the Employer.

6.4 Inspiring Tomorrow's Workforce

Local schools:

- N/A

Opportunities for school engagement:

- Possible re-planting scheme of non-invasive / large leaf species of trees.
- Assistance with any ongoing school outdoor projects focusing on the use of timber & woodchip generated and removed from site for recycling within the school grounds / garden areas.

QTS Group have an Equal Opportunities, Equality, Diversity and Inclusion Policy and Equal Opportunities Strategy in which everyone must adhere to.

6.5 Keeping Communities Safe

Potential Opportunities for trespassing due to work:

- Tree removal provides easier access.

If working in a suicide hotspot area, all staff shall be complete the rail industry suicide prevention module and be issued with the suicide prevention tactics card.

All plant will be secured and all access points to operational rails will be checked when leaving the site.

A temporary boundary fence will be erected using Heras fence bays to create a segregated plant/ops access and egress to the physical worksite. The temporary boundary will mitigate the risk of general public and livestock entering the physical worksite.

6.6 Making Rail a Great Experience

Opportunities to improve passenger experience:

- Tidying up lineside
- Removal of overgrow vegetation to clear site for future development.

6.7 Making Travel Accessible

Impact to passengers/community	Mitigation
N/A	

6.8 Respecting Cultural Heritage & Rail History

An assessment of cultural and historic areas within the sites has been carried out as part of the Environmental Scope Report carried out in December 2022 by Landlab.

Cultural heritage or rail history specifications:

- None for this project

Should any artefacts be discovered on site then works will be suspended in that area and Historic Scotland requested to attend.

6.9 Supporting Britain’s Economic Development

Where low value goods are procured, they will be sourced according to the QTS Responsible Procurement Plan.

Project Specific Employment Opportunities	How These Where Achieved
N/A	

7. Incident Management

7.1 Incident Response Plan

Emergency response plans are included in the Works Package Plans which is briefed to all persons on site and held on site. Emergency response details are also displayed on the noticeboard at all site compounds. The Works Package Plan is copied to Network Rail and other stakeholders, where applicable, for approval. Copies are available on request from QTS head office at Rench Farm, Drumclog, or can be inspected on site.

All staff are briefed on the Works Package Plan and task briefings, including the emergency response requirements.

QTS procedure SP05 Emergency Arrangements details the corporate response to foreseeable emergencies.

Spill Control

The Leak and Spillage Action Plan is detailed in the QTS Group Environmental and Ecological Manual. This will be stored with spill kits and briefed to all staff. The Emergency Spill Procedure forms a part of the set of ‘Toolbox Talks’ that are to be developed for use throughout the QTS Group on this project.

Materials and equipment for dealing with incidents is maintained at all work locations as shown in the table below. In addition to the equipment normally held on plant and vehicles, additional kits will be positioned in secure containers at locations which are isolated or have abnormally long access routes.

Spill control equipment will be held as follows:

Location	Equipment	Controller
Each vehicle and plant item	A suitable ‘spill kit’	Vehicle/machine operator
Secondary spill kits will be kept at each compound	A suitable ‘spill kit’ Heavy duty plastic bags Plastic sheeting Shovels Drip trays	Supervisor
Emergency spill kits in remote locations	A suitable ‘spill kit’ Heavy duty plastic bags Plastic sheeting Shovels Drip trays	Site manager
Static plant	A suitable spill kit will be positioned in the vicinity of items of static plant	Supervisor


Specialist Spill Contractors for Scotland Sites: Briggs, 24/7 Spill Response – Call 0800 3470348

Contact details and reporting arrangements are detailed in the Works Package Plan. All incidents are reported and investigated in accordance with QTS Supporting Procedure SP40 Accident Investigations and Formal Enquiries.

Guidelines on reporting incidents to the Environmental Agency/SEPA are attached at Appendix E

Appendix A – Environmental & Social Policies

Part I



**INTEGRATED MANAGEMENT
SYSTEMS**

**Issue 5
May 2024**

Health, Safety, Quality and Environmental Policy

QTS Group seeks to continue to prosper in business with existing and future clients, whilst supporting our employees.

QTS Group is committed to conducting our business in a manner that is safe, professional and ethical whilst at all times paying particular attention to its customers' requirements and operating in an environmentally responsible manner.

The Group will:

- Provide the resources necessary to safeguard the health, safety and welfare of our own employees and all the people affected by its operations.
- Ensure a commitment to prevention of injury and ill health and continual improvement in OH&S management and OH&S performance.
- Ensure a commitment to behavioural based safety including improving safety culture, associated training, briefing and requirements.
- Provide and maintain safe vehicles, plant, equipment and systems of works.
- Minimise the environmental impact of our activities including protecting wildlife and habitats, archaeological remains and heritage buildings.
- Prevention of pollution and the protection of species and ecosystems where we work.
- Maintain our management systems and certification to ISO 45001:2018, ISO 9001:2015, ISO 14001:2015, and continually improve on their effectiveness.
- Employ best practice to ensure projects are completed first time, on time and every time.
- Comply with health, safety and environmental legislation, regulations and other applicable requirements.
- Provide clear information, instruction, training and supervision to all our employees to ensure that they properly discharge their responsibilities and duties.
- Monitor and review our health, safety, quality and environmental performance.
- Regularly set and review objectives and targets to achieve continual improvement in OH&S, Quality and Environmental management systems and performance.

It is the responsibility of each and every employee within their specific area of responsibility to implement this policy.

The Board of Directors and Compliance Department give their full support to this Policy and shall ensure it is reviewed at least once a year and any changes are communicated and implemented.


[Redacted]

Signed: _____ Date: 01/05/2024

Andrew Steel
Managing Director

The above policy is available to interested parties online at www.qtsgroup.com and notice boards in offices, workshop, site offices and admin.

Part II

MANAGEMENT SYSTEMS**Issue 12
May 2024**

Collaborative Working Policy

QTS Group Ltd. Policy Statement

QTS Group recognises that working with clients, partner businesses, suppliers and contractors will benefit all parties and enhance efficiencies, service to our clients, and competitiveness.

We have an established culture of innovation, partnership working and co-operation with all parties to achieve mutual goals. We also strive for early and amicable resolution of conflicts.

Our policy is to further this culture through collaborative working and to establish and maintain an environment that develops trust between organisations and will deliver:

- Joint efficiency improvements
- Further innovation and new ways of working
- Development opportunities for individuals and working teams
- Increased transparency and trust between organisations
- Improved understanding of each parties' values and objectives
- A framework for setting and achieving collaborative business relationship objectives

To further develop our framework for Collaborative Working, we have developed a Collaborative Working management system and achieved ISO 44001 certification which we are committed to maintain. Through our integrated management procedures, we will seek to embed the framework and tools to assist our staff in Collaborative Working in our company systems.

QTS Group will:

- Provide the leadership and resources to enable co-operation and collaboration with our clients, partners and suppliers.
- Maintain a register of formal collaborative relationships.
- Encourage our staff to work in a collaborative manner and demonstrate our values in their relationships with other organisations.
- Ensure a free exchange of information and knowledge between all working groups.
- Regularly set and review objectives and targets to achieve continual improvement in our collaborative performance.
- Comply with the requirements of ISO 44001 and the relationship management plans agreed with our collaborative partners.

Our supply chain is important to us in achieving these objectives and we will support and develop relationships with our suppliers to achieve mutual benefits.

This policy is reviewed and developed on an annual basis.

Signed: **[Redacted]** Date: 1st May 2024

Andrew Steel
Managing Director

Appendix B – List of QTS Group Integrated Management System Procedures

Management Procedures

- MP01 Document Control System
- MP02 Management Responsibilities
- MP03 Setting Objectives and Targets
- MP04 Management Review
- MP05 Competency Management
- MP06 Training
- MP07 Communications
- MP08 Internal Audits
- MP09 Audit and Inspections
- MP10 Site Tours
- MP11 Control of Non-Conforming Products and Services
- MP12 Collaborative Working
- MP13 Energy Management

Supporting Procedures

- SP01 Fatigue Management
- SP02 Medical Requirements
- SP03 Drug & Alcohol Requirements
- SP04 Reporting of Accidents and Other Safety Related Information
- SP05 Emergency Arrangements
- SP06 Fire Safety
- SP07 First Aid
- SP08 Information Technology Management
- SP09 Sentinel Information and Track Visitor Permits
- SP10 Document Control for Legislation and Railway Industry Information
- SP11 Site Facilities
- SP12 Management of Change
- SP14 Risk Assessment
- SP15 Contract Plans
- SP16 COSHH Assessments
- SP17 Customer Feedback
- SP18 Delivery of Training
- SP19 Trainers CPD
- SP20 Recruitment
- SP21 Inductions
- SP22 Issue of PPE
- SP25 Procurement of Goods and Services

- SP26 Electricity at Work and Buried Services
- SP27 Signals Passed at Danger
- SP28 Maintenance of Plant and Equipment
- SP29 Engineering Modification to Rail Vehicle
- SP30 Manual Handling
- SP32 Insurance
- SP33 Selection & Use of Plant
- SP34 Withdrawal of Certificate
- SP35 Selection & Use of Subcontractors
- SP37 Review of Principle Contractors Licences & POS
- SP38 Planning for Railway Work
- SP39 Protection of Persons Working On or Near the Line
- SP40 Accident Investigations and Formal Inquiries
- SP41 Safety Related Defect Reporting of Rail Vehicles
- SP42 Environmental Procedure
- SP43 Policies
- SP44 Rule Books and Electrified Lines Instructions
- SP50 Workplace Health, Safety and Welfare
- SP51 Control of Rope Access
- SP52 The Construction Design and Management Regulations
- SP55 Training and Supervision for Rope Access Activities
- SP56 Complaints
- SP57 Maintenance of Environmental Aspects and Impacts
- SP58 Tender Quotation Process
- SP60 PC Licence & POS Interference Requirements
- SP62 Road Rail Plant Operators
- SP63 Design Management
- SP64 Display Screen Equipment
- SP65 Behavioural Safety
- SP66 Anti Bribery
- SP67 Principle Designer
- SP68 Occupational Health in the Workplace
- SP69 VQ Induction Process

Relevant/Appropriate Works Procedures will be included with Site documentation.

Appendix C – Environmental & Social Risk and Opportunities Assessment Matrix

-Based on Network Rail’s Corporate Risk Assessment Matrix

Likelihood Score		Impact Score				
		Impact 1	Impact 2	Impact 3	Impact 4	Impact 5
Score (Likelihood + Impact)		Negligible impact to a minimal area of low environmental or social significance, managed by internal control procedures (e.g. Spills <20 litres; Fly tipping)	Minor or minimal short-term impacts to the environment or social areas (e.g. Minor spill of >20 litres; dust/odour; Disturbance to locally protected Biodiversity Action Plan (BAP) species or its habitat)	Significant impact to the wider environment or social areas, where short term (<6 months) restoration works are needed (e.g. Confirmed spread of an invasive species; Disturbance to a statutorily protected site or a European nationally protected species or habitat; Damage to a Site of Special Scientific Interest (SSSI); destroying the habitat of a protected species).	Major, persistent and/or extensive impact to the environment or social areas where longer term remediation is required (>6 months) e.g. Long term pollution involving toxic, hazardous or infectious materials/waste; Use of resources under threat of depletion; Damage to a statutorily protected site or a European/nationally protected species or habitat; Unlicensed killing of a small population of a European/nationally protected species).	Catastrophic and irreversible environmental damage to social areas or environment (e.g. Irreparable damage to protected sites and/or unlicensed killing of a local/regionally significant protected species population; Direct over-consumption of natural resources causing irreversible depletion of that resource).
5	>75% Very High likelihood the risk will occur. Risk would occur 5 times a year or more	5	10	15	20	25
4	51-75% High likelihood the risk will occur. Risk would occur between 1 and 5 times a year	4	8	12	16	20
3	21-50% Medium likelihood the risk will occur. Risk would occur between once in 5 years to just less than once a year	3	6	9	12	15
2	5-20% Low likelihood the risk will occur. Risk would occur between once in 25 years or up to once in 5 years	2	4	6	8	10
1	<5% Very Low likelihood the risk will occur. Risk would occur less than once in 25 years	1	2	3	4	5

Likelihood Score		Impact Score				
		Impact 1	Impact 2	Impact 3	Impact 4	Impact 5
Score (Likelihood + Impact)		Temporary positive impacts to environment or social agenda	Positive impacts to the environment or social agenda, benefitting an immediate area within QTS (e.g. contributing to project specific environmental or social objectives).	Single positive impact to the environment or social agenda, benefitting locally and internally to QTS	Multiple positive impacts to the environment or social agenda, benefitting locally within and external to QTS	Long term positive impact to the environment or social agenda, benefitting QTS nationally and the UK more widely
5	>75% Very High likelihood the opportunity will occur. Opportunity would occur 5 times a year or more	5	10	15	20	25
4	51-75% High likelihood the opportunity will occur. Opportunity would occur between 1 and 5 times a year	4	8	12	16	20
3	21-50% Medium likelihood the opportunity will occur. Opportunity would occur between once in 5 years to just less than once a year	3	6	9	12	15
2	5-20% Low likelihood the opportunity will occur. Opportunity would occur between once in 25 years or up to once in 5 years	2	4	6	8	10
1	<5% Very Low likelihood the opportunity will occur. Opportunity would occur less than once in 25 years	1	2	3	4	5

Appendix D - ESMP Risk & Opportunity Assessment

Risk Assessment										
	Issue	Requirements	Description	Affected Parties	Likelihood 1-5	Impact 1-5	Score (Likelihood x Impact)	Existing Mitigation	Future Actions	Owner
All works	Nearby Nature Conservation Area	No works in this area without specific method statement and approvals	Damage to sensitive sites	Ecology/ wildlife	1	3	3	Works planned out with designated area. Staff briefed on location and nature of site	Review if work scope changes	Project manager
Vegetation cutting and chipping	Bird Nests	NR standards, legislation	Bird nests damaged when cutting vegetation	Wildlife and protected species	2	3	6	PEA completed before work commences Training to advise of risk	Bird nesting surveys completed during duration of project	QTS, Individual operators
Access and egress (adjacent to or across farmland)	Bio security in relation to livestock	Level 2 biosecurity control	Transfer of pests and diseases	Adjoining stockholders	2	2	4	Wheel cleaning and disinfectant spray. Briefing and instructions to all staff	Monitor for compliance	QTS, all staff attending the site
Tree Cutting	Disturbance to wildlife	NR Standards, legislation, SNH licence requirements	Disturbance and displacement of wildlife	Wildlife, primarily birds, bats, possible badgers, otters and others	3	2	6	Surveys, staff training, staff notify if evidence of protected species found. Licence application and specific method statements for working in proximity to protected species	Bird nesting survey prior to work. Daily site inspection ahead of work. Tree cutting before nesting season	QTS, tree cutting operatives, site manager
Chipping	Waste and pollution	Environmental damage legislation	Damage to local/protected environment, chips can combust if piles too deep	Site, wildlife and protected species	2	2	4	Chip piles kept away from watercourses and protected areas, chips spread on site, operatives training and briefings	On site supervision and monitoring as work proceeds	QTS, chipping operative
Access for plant and machinery	Traffic congestion, noise, ground/verge damage (and safety)	Legislation: Environmental and road traffic, Code of Construction Practice	Causes/increases congestion, noise and ground damage at and around access points.	Other road users and neighbours, site/ environment, adjacent land and accesses	1	4	4	Use of agreed access points and routes, working hours specified, overall planning and programme of works	Monitor compliance, advise if additional accesses are required and access impact	QTS, planners, supervisors and operatives
Earthworks and drainage	Water pollution	NR standards, legislation, CDM Regs	Silt, sediment, polluted water enter drains or watercourse	Environment, wildlife adjacent land occupiers/ farmers	2	3	6	Works design, organisation and layout, operator competencies	On site management and supervision	Project management, site manager and operatives
Earthworks and drainage	Materials deposited in incorrect locations, consequent pollution	NR standards, legislation, CDM Regs	Lineside, railway ballast, third party land contaminated	Infrastructure owner, third parties	2	3	6	Works design, organisation and layout, operator competencies, WPP and task briefings, lay down areas and storage	On site management and supervision	Project manager, site manager and operatives

Drilling and grouting	Water pollution	Legislation, CDM Regs, Industry COP's	Drill into rock to fix anchors	Adjacent watercourses and land	2	4	8	Manufacturers instructions and code of practice, GI surveys	Establish buffer zones, detailed methodology	Project and site management, supervisors
Interface with pedestrians	Footways and paths adjacent to site	Health and safety, CDM Regs, NR standards	Risks of injury to pedestrians entering work area	Third party pedestrians, site staff may also be exposed to increase risk	2	3	6	Identify pedestrian routes, temporary path closures with signage and diversions, barriers and signage at access points, staff awareness and training	Site management and supervision to ensure compliance and appropriate measures in place	Site manager, operatives
Refuelling	Pollution	NR standards, legislation	Damage to environment, wildlife, water bodies and water supply	On site and adjoining wildlife and water users	1	3	3	Training, correct storage and use of containers/tanks, spill kits carried on vehicles	Siting of plant and machinery and refuelling locations per WPP details	Site manager, operatives
Herbicide treatment of cut stumps	Pollution or environmental damage	Network Rail standards, legislation, Code of Practice for using plant protection products in Scotland (2007)	Drift causing damage to adjacent plants and environment, spillage causing pollution, incorrect product causing unwanted effects	Adjacent vegetation, wildlife and environment	2	3	6	Work planning and specification, correct equipment and storage, NPTC competent operatives, BASIS advisor	Monitor compliance, pesticide application records	QTS, project manager and NPTC operatives
All works	Light	Safety requirements for task lighting in poor weather and at night	Light visible from or spilled onto neighbouring properties	Neighbouring properties generally residential	3	1	3	Operatives trained and competent, follow QTS works procedures and task briefings, works subject to planning and inspection	Notices issued to neighbours	Operatives, site manager, work planners
Contaminated Land	Troughing and ballast may contain asbestos or hydrocarbon	Health and safety and waste management legislation, CDM Regs, NR standards	Operator exposure, carriage and treatment of special waste	Operatives, Environment	2	2	4	Operator awareness and briefing, works organised to minimise disturbance to troughing/ballast, waste management procedures	Monitor progress of works and compliance	Site manager, operatives
Access for all works, tree cutting and de-veg works in vicinity of Ash Tress	Chalara dieback of Ash	Prevent spread of disease	Spores may be present on site if diseased Ash trees are on site, disease may be introduced from other work sites.	Ash trees on site or on other work sites	3	2	6	Site survey to assess presence of Ash	Inspect trees for presence of disease Implement NR guidelines as in force at time of work	Site manager
All works	Impact on local businesses	Limit impact of activities on recreation, tourism and business	Activity and disturbance reduces number of visitors to businesses and sites in vicinity	Local businesses	2	2	4	Pre-work surveys and assessments, organisation of works and arrangement of accommodation and vehicle routes	Monitor progress of works for adverse impacts and address as necessary	Site manager

Vehicles	Pollution	NR standards, legislation	Limit emissions from vehicles/plant on site	Environment	4	3	12	Extensive TBT's, briefings and induction presentations highlighting the importance of turning off engines not in use	Site management and supervision to ensure compliance and appropriate measures in place	Site managers, operatives
All works	Giant Hogweed	Injury to staff and spread in environment.	Giant hogweed onsite.	Environment and all staff	4	3	12	Staff Awareness and Appropriate PPE.	Follow invasive species management plan.	Site manager and operatives.

Opportunity Assessment

Activity	Opportunity	Description	Affected Parties	Likelihood 1-5	Impact 1-5	Score (Likelihood x Impact)	Actions	Owner
Vegetation management	Pollination	Increase opportunity for pollinators	Environment	2	4	8	During reseeding works, wildflower or a mix of grass and clover seeds should be used instead of just grass seed to make a more pollinator friendly environment	QTS, planners, site manager, operatives
Vegetation management	Biodiversity	Calculate any net loss in order to offset it	Environment	5	4	20	During the planning and scoping of works, calculations will be made using a biodiversity calculator to determine any net loss so that it can be offset	QTS, Ecologists, Env Team, NR
All works	Community relations	Improve community relations	Local residents, local businesses	3	2	6	Ensure good communication with adjoining landowners and providing small improvements when requested.	QTS, site manager, operatives
Fencing	Keeping communities safe	Use fencing to stop access to the worksite & railway	Local residents, general public, local livestock	4	1	4	Erect fencing around works where the public/livestock could	Site manager, work planners
All works	Reducing fuel use	Reduced load site facilities to accommodate smaller generators	Environment	3	4	12	Site cabins updated to require a reduced load of electricity so that the generator can be reduced to run more efficiently and therefore use less fuel	QTS, site managers, procurement, Env team

Appendix E: SEPA/EA Incident Reporting

Guidelines on reported incidents to the Environmental Agency and SEPA (Extract of Memorandum of Understanding with the Environmental Agency)

The following list is included as an example of the criteria and is not meant to be exhaustive. It may also be influenced by factors such as the Environmental Sensitivity of the site. Discussions should therefore take place at a local level to agree when the Environmental Agency or Scottish Environmental Protection Agency should be informed of environmental incidents.

- Spillages of HAZCHEM listed chemicals (unless otherwise stated. See Note 1)
- Spillages of Low Hazard products with polluting potential (See Note 2)
- Petrol spillages greater than 100 litres
- Hydrocarbon spillages greater than 20 litres (Inc. hydraulic oils and cutting oils)
- Any spillages in or near watercourse
- Incidents at EA/SEPA – regulated Network Rail sites in accordance with permit conditions
- Incidents involving hazardous fly tipped waste.
- Loss of cable or transform oil in accordance with the incident notification thresholds contained in Annex 2
- Incidents involving flooding from main river watercourses or where actions or incidents have occurred that could increase the risk of future flooding (See Note 3)
- Significant releases of silt/sands/cement slurry (Note 4)

There might be incidents that do not fall into any of these categories; if any doubt exists, then the correct agency should always be contacted.

Note 1: Incidents involving UN classified Dangerous Goods should be notified to the EA or SEPA unless the incident involves only small quantities of mineral oils (under 20 litres). Incidents involving most gases are unlikely to be of interest to the EA or SEPA unless large quantities of water or foam are used. Ammonia and Chlorine are notable exceptions.

Note 2: Substances such as milk and beer are highly polluting if discharged into the aquatic environment. Many other seemingly low hazard substances can also pose a risk. A list of 'Low Hazard Products with Polluting Potential' is included in Table 1

Note 3: Discharges of silty/sandy water can be highly polluting and should be avoided, as should discharges of water contaminated with cement. Typical sources of such pollution can include dewatering operations, dredging and surface run-off during construction activities.

Low hazard products with polluting potential

Substance	Threshold	Example
Detergents	25 litres	Washing powder, washing up liquid, shampoos, soaps and car cleaning products.
Disinfectants	25 litres	Household bleach, Dettol
Food Stuffs	250 litres	Most have the potential to cause problems but of particular concern are sauces, sugar, salt, syrups, milk, cream, yogurt and vinegar
Beverages	250 litres	Soft drinks, beers, lagers, wines and spirits
Fertilisers	25 Kg	All
Paint & Dye	25 Kg	All
Other organic liquids/slurries	Varies	Blood, offal, farmyard slurries, firefighting foams, sewage sludge, antifreeze, cutting, lube and cooking oils, glycerine, alcohols, latex, water soluble polymers

The effects of these products vary widely; some, such as detergents, are toxic to aquatic life. Silt and sand can smother and choke aquatic life whilst others, such as foodstuffs, beverages and blood, can deoxygenate the water. Fertilisers and detergent are both toxic and lead to deoxygenation. Every effort should be made to contain these products.

The threshold quantities above are a guide. If there is a spillage of any of the any of the substances, the EA or SEPA should be contacted if more information is required about the possible effects. Other, seemingly harmless, products such as tyres, rubbish and straw can also cause problems if involved in fires, as fire-fighting run-off from incidents involving them can be highly polluting.