

ELECTRICITY NETWORK DEVELOPMENT PROCESS – ENVIRONMENTAL COMPLIANCE AND SUSTAINABILITY

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FORWARD

This procedure defines what the environmental requirements & responsibilities are throughout the Electricity Transmission Network Development Process, and how these are discharged through an environmental representative. The environmental representative may include departments and individuals in National Grid and appointed contractor organisations.

PURPOSE AND SCOPE

The purpose of this procedure is to:

- Ensure compliance to the requirements of National Grid's Environmental Management System (EMS) throughout the Electricity Transmission Network Development Process (NDP)
- Enable effective investment delivery consistent with National Grid's Environmental Policy
- Minimise National Grid reputational risk in relation to environmental issues within the NDP
- Promote innovation and continuous improvement in all aspects of environmental management
- Ensure that environmental issues are identified and addressed so that undue delays and environmental risks are avoided.

- Define who the responsible persons or departments are at each stage of the NDP for environmental compliance
- Define who the accountable persons or departments are at each stage of the NDP for environmental compliance
- Define the required documentation and key deliverable at each stage of the NDP

This procedure applies to all projects which comprise the UK Electricity Transmission Capital Investment programme.

This procedure describes how each of the following requirements of ISO 14001 are implemented in Electricity Transmission Investment NDP in accordance with National Grid Environmental Management System

PART 1 – PROCEDURAL

1 POLICY

It is the responsibility of the Safety Sustainability & Resilience (SSR) Directorate to develop and review the National Grid Environmental Policy in consultation with the business. It will be made available on the National Grid SSR infonet home page or www.nationalgrid.com

It is the responsibility of the Project Engineer to ensure that the current National Grid Environmental Policy Poster is displayed in a location easily visible to the project team such as the project notice board for the duration of the project.

Further information and hyperlinks are in Appendix B

National Grid has documented the minimum requirements for implementation of its policy by appointed construction contractors in the Works Information.

2 PLANNING

2.1 Environmental Aspects

It is the responsibility of Capital Delivery Electricity Transmission to identify applicable environmental aspects in accordance with NGUK/SHE/211 Procedure for Environmental Aspects to satisfy the requirements of ISO 14001 clause 4.2 Environmental aspects.

Identification of Environmental Aspects & Impacts

Procedure NGUK/PM/SHE211 Environmental Aspects makes reference to the Generic Environmental Aspects Register which records all the environmental aspects that may be encountered with different National Grid operations and activities. This register shall be consulted when planning new work on the system to ensure suitable control measures are taken to mitigate any significant environmental impacts associated with it. The register refers to the relevant environmental procedures that shall be followed to mitigate potential negative impacts.

For an awarded construction project the appointed Principal Contractor/Contractor shall use the pre-construction information to develop a project specific environmental aspects and impacts register as part of the Project Environmental Management Plan (PEMP).

This shall clearly document which are the identified significant aspects, the methodology for identifying significance along with the project specific mitigation/control measures.

2.2 Legal and Other Requirements

In accordance with NGUK/SHE/219 Procedure for Legal and Other Requirements the SSR Environmental Operations Team will inform Electricity Transmission of new or amended legal and/or other requirements that will have a significant impact through the SSR directorate's *'What's on the Horizon'* process along with a SHE Bulletin, as necessary.

The environmental legal register is a document that lists the environmental legislation that is applicable to National Grid. The National Grid environmental legal register is available on the SSR Environmental Management System Infonet. The legal register shall be consulted by those responsible for environmental management to ensure legal requirements are identified, understood and complied with for all applicable works for the duration of a project.

Further information and hyperlinks are available in Appendix B

Appointed Principal Contractors/contractors shall review and incorporate applicable environmental legislation and National Grid procedures within the PEMP. As part of the environmental aspects and impacts register the appointed Principal Contractor/Contractor shall document which aspects are governed by legislation and record the corresponding act or regulation.

2.3 Objectives, Targets and Programme(s)

Corporate environmental objectives shall be set by the SHES Committee in accordance with NGUK/SHE/226 Environmental Objectives, Targets and Programmes Procedure. These are documented in Our Contribution

Capital Delivery Electricity Transmission via the Capital Delivery Executive Committee (CDEC) shall set targets that are monitored through the Sustainable Construction Implementation Plan (SCIP). These targets shall be implemented by the appointed Principal Contractor/Contractor on construction projects as detailed in the Works Information. The appointed Principal Contractor/Contractor shall include but not be limited to the applicable SCIP targets as part of the project's environmental targets which shall be documented in the PEMP

If the SCIP targets are updated and a project has already commenced a Project Managers Instruction (PMI) shall be issued to implement the new targets on the project.

3 IMPLEMENTATION AND OPERATION

3.1 Roles and Responsibilities

3.1.1 Environmental Representative

The Environmental Representative is the nominated person(s) accountable or responsible for ensuring that the project manages all environmental aspects and complies with relevant legislation throughout all stages of the NDP.

The Environmental Representative shall support the project teams through each TP500 stage and is responsible for identifying environmental risks. During construction delivery the Environmental Representative will carry out duties that include but are not limited to conducting sensible monitoring and assist the project team in understanding environmental issues and the promotion of best practice. The Environmental Representative shall attend relevant meetings to provide regular environmental updates and provide a supporting role to the project team throughout the delivery of the investment.

The table below summarises how the environmental representative role is discharged through relevant department(s) and person(s) across the NDP phases.

3.1.2 Summary of Accountabilities, Responsibilities and Deliverables

NDP 4.1.		
Accountable	Responsible	Deliverable
ETAM – Investment Delivery Engineer (IDE)	Land - Scheme Development Officer (SDO)	Needs Case Report
	Consents -Lead Consents Officer (LCO)	
NDP 4.2		
Accountable	Responsible	Deliverable
ETAM – IDE Major Infrastructure Development (MID) SPM for Development Consent Order (DCO) projects	Land - (SDO)	Project Brief
	Consents -LCO	Carbon Estimate
		Sustainable Options Assessment Tool
NDP 4.3		
Accountable	Responsible	Deliverable
Development Engineer (DE)	DE	Project Execution Plan (PEP) Carbon Interface Tool Sustainable Options Assessment Tool
	Land - SDO	Works Information (sections of PEP)
	Consents -LCO	Site Information sections (PEP)
NDP 4.4		
Accountable	Responsible	Deliverable
Senior Project Manager (SPM)	Project Manager/Engineer	Project Managers Report Carbon Interface Tool Sustainable Construction Implementation Plan
	Principal Contractor/Contractor	PEMP Site Waste Management Plan (SWMP)
NDP 4.5		
Accountable	Responsible	Deliverable
ETAM- IDE	Project Manager/Engineer Principal contractor/Contractor CDM (A)	Environmental File

Table 1: NDP Stage Environmental Representatives

3.1.3 NDP 4.1 Establish Portfolio

This section defines who is accountable and responsible for enacting the Environmental Representative roles at the NDP 4.1 stage and the required documentation that shall be produced to proceed to the NDP 4.2 stage.

a) Investment Delivery Engineer (IDE)

The IDE is accountable for leading the Investment Team to progress the projects in line with National Grid policy and procedures. The IDE shall, in conjunction with Land and Consents departments consider the environmental risk of the proposed investment in line with NGUK/SHE/211 Procedure for Environmental Aspects and Impacts.

The IDE shall be responsible for requesting additional project specific environmental or sustainability support from the Capital Delivery Environment and Sustainability Manager if required.

b) Scheme Development Officer (SDO)

The SDO in the Land department will identify required environmental surveys and information necessary to support any applications for consent; discharge of National Grid's statutory duties under the Electricity Act, Town and Country Planning Act, or Planning Act; or to satisfy other company environmental responsibilities.

The SDO will provide all information which National Grid holds with regards to the land/site intended for development, which will enable environmental risk to be appropriately assessed. This includes managing the liaison with National Grid Property to ensure environmental remediation work is identified or completed as required by the investment. Land activities associated with investment delivery are described in the Consents and Land Rights Strategy document.

c) Lead Consents Officer (LCO)

The LCO is responsible for ensuring relevant environmental consents and survey requirements are obtained specific to the Investment.

d) National Grid Property

National Grid Property is responsible for managing the process for the identification, assessment and remediation of historic land contamination at National Grid sites in accordance with their policies and procedures (SHE206 Management of Contaminated Land) .

The LCO and SDO shall ensure that new information identified through site activity (e.g. evidence of contamination, removal of existing contamination as a result of delivery activity, etc.), audit, etc. is made available to the National Grid Property Environment Manager for inclusion in the risk assessment process.

e) Deliverable

Needs Case Report – This is the main deliverable that is created during NDP 4.1 stage and has the required information to progress to the NDP 4.2 stage. It demonstrates that there is a driver for investment which is aligned to relevant business strategies. The Needs Case is required to pass Gate A2 and is subsequently an input to NDP 4.2 Select Option. Potential environmental aspects and impacts that may affect the project shall be documented in section 6 Solutions – Risk Constraints and Opportunities.

3.1.4 NDP 4.2 - Select Option:

This section defines who is accountable and responsible at the NDP 4.2 stage and the required documentation that shall be produced to proceed to the NDP 4.3 stage

a) Investment Delivery Engineer (IDE)

Where requested by the IDE, the Delivery Unit shall provide target costs and associated programme implications for any detailed environmental surveys and assessments required. This shall, where necessary, include work to provide the contaminated land/waste characterisation information needed to inform the Site Waste Management Plan.

The IDE shall ensure updates of relevant design documentation as described in UKBP/TP500 to include environmental information and that it is agreed at the Design Review meetings prior to sign-off.

The IDE shall use the Cost Book provided by the eHub to assess the potential carbon impact for scheme options. The IDE shall use the outputs from the Cost Book as part of the decision making criteria and record this in the Project Brief. The Cost Book should be stored on Livelink. The IDE should inform the CD Sustainability Team when an assessment has been completed. The CD Sustainability Team will report on the outcomes for schemes once they have passed Gate B.

b) Projects Requiring Development Consent

During the NDP 4.2 Select Option Stage, any projects identified as requiring Development Consent from the Planning Inspectorate need support from Capital Delivery Major Infrastructure Development (MID)

The Investment Delivery Engineer shall request a Major Infrastructure Development Senior Project Manager to be appointed to the project. The Development Consent for the project will then be delivered in line with the Development Consent Guidance flow chart as described in TP/500.

MID schemes shall follow the NDP framework recognising that, because significant funding is required in order to complete optioneering and achieve development consent, separate sanction will be sought from the relevant Investment Committee.

c) Lead Consents Officer (LCO)

Where consent or planning permission is required then legislation may require a formal Environmental Impact Assessment (EIA) and production of an Environmental Statement to accompany the consent application. The IDE shall work with National Grid LCO to facilitate this deliverable.

The LCO shall complete the Schedule 9 Electricity Act Assessment record. The record shall identify and allocate tasks and responsibilities in conjunction with the IDE and agree a programme for when the activities are to be carried out.

The LCO shall complete the Environmental Consents Checklist.

d) Scheme Development Officer (SDO)

The SDO shall liaise with National Grid Property to ensure that land remediation issues are identified and the impact assessed by the Environmental Representative.

e) Development Engineer (DE)

Where environmental risks have been identified at the 4.2 NDP stage the DE shall either review or update the environmental documentation. Any likely consents issues should be considered at this stage along with the need to instruct the project to carry out environmental survey/ mitigation (e.g., ecology, flood risk, etc.) works that are deemed critical to the delivery of the investment.

f) Principal Designer (PD)

The PD responsibilities are defined in UKBP/TP137.

g) Construction Design Management Advisor CDM (A)

The CDM (A) responsibilities are defined in UKBP/TP137.

The CDM (A) is the person nominated in the project team to collate the Pre-Construction and Construction Phase SHES Information.

The CDM (A) shall ensure that an Environmental Representative is present at the Investment Team meetings where necessary.

h) Deliverables NDP 4.2

(i) Project Brief

The Project Brief is created during NDP 4.2 Select Option and records the consideration of a range of options and an agreed preferred option (build or no-build) to progress. The Project Brief is required to pass Gate B and is subsequently an input to NDP 4.3 Develop and Sanction. Environmental aspects and impacts shall be identified and documented in section 9 Risks/ Opportunities to be developed in 4.3 .

3.1.5 NDP 4.3 - Develop and Sanction:

This section defines who is accountable and responsible for enacting the Environmental Representative roles at the NDP 4.3 stage and the required documentation that shall be produced to proceed to the NDP 4.4 stage.

a) Development Engineer (DE)

For works to be delivered by Capital Delivery, the DE is the appointed person who is responsible for the passage of each investment or project through NDP 4.3 stage. The DE leads the work required to develop the preferred option to a suitable state for sanction and progression through Gate C. In order to discharge this responsibility the Development Engineer shall take over leadership of the Investment Team (adding members as needed). The DE shall ensure that meetings are convened as required by the process milestones, environmental & sustainability considerations are incorporated and in line with NG policy, minutes/actions are recorded to provide a fully auditable trail.

Capital Delivery operates to the highest standards of Environmental compliance, in accordance with the requirements of UKBP/TP188 – Design Management. It is the responsibility of the DE to include Environmental and Sustainability considerations as part of the HAZARD review defined in UKBP/TP188. A full and separate Sustainability Review should be held for large projects and projects that have a high potential to incorporate sustainability in their design.