Construction Environmental Management Plans have long been used to provide a documented commitment to management and mitigation measures that will be employed before, during or after construction. They have typically been written in a draft, or outline format, prepared from the mitigation recommendations of an Environmental Impact Assessment (EIA).

Since the Planning Act 2008 development consent process was introduced, 72 schemes have been registered with the Planning Inspectorate (PINS), and formerly, by the Infrastructure Planning Commission. Of those that were granted permission or have a decision pending, 58 Construction Environmental Management Plans (CEMP) or Codes of Construction Practice (CoCP) have been submitted. A CoCP tends to be more of an overarching set of measures for a project, and it is intended that site specific management plans (CEMPs) are developed by contractors from these. CEMPs are not specifically required to be submitted as part of an application, but are frequently noted as good practice in scoping reports and scoping opinions.

In a review of the 58 documents submitted to PINS, it was found that the length of these documents varies quite considerably (see Error! Reference source not found.).

<table>
<thead>
<tr>
<th>Number of pages</th>
<th>Least</th>
<th>Most</th>
<th>Average</th>
</tr>
</thead>
<tbody>
<tr>
<td>CEMP</td>
<td>4</td>
<td>1521</td>
<td>107 (69)*</td>
</tr>
<tr>
<td>CoCP</td>
<td>18</td>
<td>413</td>
<td>80</td>
</tr>
</tbody>
</table>

*The A30 Temple to Higher Carblake Scheme submitted a final CEMP of 1521 pages. The results without this document are shown in brackets.

Trends show the length of documents is increasing over time, however, this does not appear to be a rapid increase overall (Figure 1).

This is considered a positive sign, indicating plans are being reinforced with the lessons learnt on similar projects, but does not show that plans are unwieldy, unmanageable and unreadable much like the Environmental Statements (ES) from which many of these documents are formed.

There is a clearer pattern when dividing the schemes into two group; linear schemes and non-linear schemes. The assumption here was that linear schemes have the potential to pass through a more varied environment, potentially affecting more receptors or stakeholders; which would give rise to a longer set of specific management controls and therefore a longer document. This hypothesis has proved to be correct according to Figure 2 which demonstrates that most linear schemes give rise to longer documents which are increasing in length over time. Of the ten shortest documents reviewed, seven of these were for non-linear schemes. Of the ten longest reviewed, all ten were for linear schemes. Non-linear schemes appear to have a more consistent document length overall, but with a slight decrease in length over time.
The amount of detail provided varied from a simple proposed structure for developing a future, more detailed plan (Daventry International Rail Terminal), through to a monstrous 1521 pages containing construction method statements and protected species licences (A30 Temple to Higher Carblake). Factors which are thought to influence the length of the document include:

- The sensitivity of the environment and therefore more management measures are required to control risks during construction (as noted above, linear schemes typically produced longer CEMPs)
- The complexity of the project and risk the construction of the scheme would pose to the environment.
- Stakeholder influence and the need for more defined commitments to be submitted as part of Environmental Statements.
- The stage in development the scheme is at will limit the amount of information known about intended construction methods, and may reduce the number of firm commitments the client may be prepared to make at the time. For similar reasons, early contractor involvement schemes may be able to include more commitments earlier within the process.

In summary, the review has shown that CEMPs are growing, but not exponentially. They are known to vary quite significantly in structure, length and detail but have generally been found to reflect the complexity of the project, and the sensitivity of the surrounding environment. For the future, we should remember the dual purpose of a CEMP is to (1) collate and commit to management measures in agreement with stakeholders, and (2) provide the contractor with a briefing to manage the project in a responsible way. Lengthy, unwieldy documents can hinder the contractor in translating this brief into real actions on site.

Alison Morrissy, Principal Environmental Consultant, Arcadis, March 2016.

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