



Thames Water Utilities Ltd

New Operations Building, Reading STW

Construction Environmental Management Plan

665107_01

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RSK General Notes

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Author	Melissa Kane	Technical reviewer	Rachael Riley
			
Signature		Signature	
Date:	12.06.2026	Date:	12.06.2026

Project manager	Eleanor Lee
	
Signature	
Date:	12.06.2026

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Contents

1	INTRODUCTION	1
1.1	Context	1
1.2	Document scope.....	2
1.3	Document purpose	2
	Project description	3
1.3.1	Location	3
1.3.2	Project description	4
1.3.3	Project programme	5
1.3.4	Site boundary	6
2	SUSTAINABILITY POLICY	7
3	ROLES AND RESPONSIBILITIES	8
4	MANAGEMENT OF RISKS AND OPPORTUNITIES	11
4.1	Project aspects, impacts and risks	11
4.2	Compliance obligations	11
4.2.1	Contract requirements	11
4.2.2	Environmental statement mitigation requirements	11
4.2.3	Register of legal and other requirements	11
4.2.4	Consents management	12
4.2.5	Undertakings, assurances, commitments	12
4.2.6	BS EN ISO14001:2026	12
4.2.7	BREEAM [and other assessment schemes]	12
4.2.8	Considerate Contractor Scheme (CCS)	12
4.2.9	Environmental good practice on site guide, CIRIA (C811):.....	13
5	TARGETS AND OBJECTIVES.....	14
6	TRAINING, COMPETENCE, AWARENESS	15
6.1	Training and competence management.....	15
6.2	Project specific training and awareness	15
7	COMMUNICATION	17
7.1	Internal communication	17
7.2	External communication	18
8	DOCUMENTATION	19
9	OPERATIONAL PLANNING AND CONTROL	20
9.1	Operational control plans	20
9.1.1	Ecology	21
9.2	Construction management	21
9.2.1	Programme	21
9.2.2	Construction methodology (RAMS/WPPs).....	21
9.2.3	Management of subcontractors and other suppliers	22
9.3	Incident management and investigation	22
10	PERFORMANCE EVALUATION	23
10.1	Monitoring, measurement, analysis and evaluation	23
10.2	Assurance	23
10.3	Management review	25

10.4 Nonconformity and corrective action	26
10.5 Continual improvement and lessons learned	27
11 INTRODUCTION	42
12 ALERTS	44
13 LOCAL RADIO AND TV STATIONS	45
14 THE DESIGNATED EMERGENCY REPRESENTATIVE	46
14.1 Actions of the Designated Representatives	47
15 ACTIONS OF OPERATIONAL STAFF AND VISITORS	48
16 POST EVENT ACTIONS	51
17 LIST OF EMERGENCY SUPPLIES	52
18 FLOW DIAGRAM	53

TABLES

Table 1: Roles and Responsibilities	8
Table 2: Consents management	12
Table 3: Project specific training and awareness	15
Table 4: Internal communication	17
Table 5: Operational control plans	20
Table 6: Monitoring, measurement, analysis and evaluation	23
Table 7: Assurance	24
Table 8: Management review	25
Table 9: Continual improvement and lessons learned	27

FIGURES

Figure 1: showing redline boundary of new operations building with associated infrastructure and car park within the wider context of the Reading STW site	6
Figure 2: showing Reading STW groundworks site layout	29
Figure 3: showing proposed site plan of new operations building at Reading STW	30

APPENDICES

APPENDIX 1 : CROSS-REFERENCE MATRIX, ISO 14001:2026	28
APPENDIX 2 : LOCATION MAP	29
APPENDIX 3 : SITE PLAN	30
APPENDIX 4 : SUSTAINABILITY STATEMENT	31
APPENDIX 5 : ROLES AND RESPONSIBILITIES	31
APPENDIX 6 : ASPECTS REGISTER	33
APPENDIX 7 : REGISTER OF LEGAL AND OTHER REQUIREMENTS	34
APPENDIX 8 : CONSENTS TRACKER	35
APPENDIX 9 : U&A TRACKER	36
APPENDIX 10 : SUSTAINABILITY STRATEGY	37
APPENDIX 11 : SUSTAINABILITY STRATEGY TRACKER	38
APPENDIX 12 : ENVIRONMENTAL MANAGEMENT & SUSTAINABILITY DOCUMENTATION TRACKER	39
APPENDIX 13: CONSTRUCTION PHASE EMERGENCY ACTION PLAN	40
APPENDIX 14: RADIATION EMERGENCY ACTIONS	54

1 Introduction

1.1 Context

RSK Environment Limited (RSK) has been instructed to produce a construction phase environmental management plan (CEMP) to support the planning application to Reading Borough Council for the proposed delivery of a new operations building at Reading STW, Island Road, Reading RG2 0RP to satisfy the following proposed pre-commencement condition of the approved planning application PL/26/0373 with Reading Borough Council which states:

No development shall take place (including demolition, ground works, vegetation clearance) until a construction environmental management plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following.

- a) Risk assessment of potentially damaging construction activities.*
- b) Identification of “biodiversity protection zones”.*
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).*
- d) The location and timing of sensitive works to avoid harm to biodiversity features.*
- e) The times during construction when specialist ecologists need to be present on site to oversee works.*
- f) Responsible persons and lines of communication.*
- g) The role and responsibilities on site of an ecological clerk of works (ECOW) or similarly competent person.*
- h) Use of protective fences, exclusion barriers and warning signs.*

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details.

Reason: To minimise impacts on biodiversity in accordance with Paragraphs 187 and 192 of the National Planning Policy Framework (2024) and Policy EN12 of the Reading Borough Local Plan 2019.

Thames Water Utilities Ltd has appointed Clancy Group Ltd as groundworks contractor and there will be a separate contractor for the building of the superstructure for this project.

The principal contractor (PC) is required to formally communicate and implement the requirements of the CEMP to its employees and supply chain and is required to integrate its requirements into the project management system arrangements (including processes, procedures, and documentation).

The project environmental management system arrangements as set out in the CEMP meet the requirements of BS EN ISO14001:2026, as set out in a cross-reference matrix in Appendix 1.

1.2 Document scope

The scope of the CEMP includes all aspects of environmental sustainability (usually termed environmental management in this document) for the project activities, and signposts wider sustainability aspects and social value arrangements where appropriate.

The CEMP follows the requirements of BS EN ISO14001:2026. It is based on Thames Water Utilities Ltd's environmental management system and incorporates the requirements of Thames Water Utilities Ltd relevant to the project scope.

The CEMP is a live document and forms part of the contractual project management system. It is owned by Thames Water Utilities Ltd's project director. The document is reviewed monthly and updated accordingly to take account of any changes to project and programme scope.

1.3 Document purpose

The purpose of the document is to set out Thames Water Utilities Ltd's approach to environmental management (and wider sustainability requirements where relevant) during the construction phase of the works for the new operations building at Reading STW in order to meet the requirements of the Sustainability Statement, which forms Section 5 of the 'Design and Access Statement'.

The purpose of the CEMP, in relation to the project scope, is to:

- Demonstrate how the environmental management and wider sustainability (where relevant) risks, opportunities and requirements associated with the project have been identified (including legal and client requirements)
- Define environmental management control measures to prevent pollution, avoid, minimise and mitigate unavoidable environmental impacts, and meet other requirements
- Identify and meet project targets and objectives for environmental management and wider sustainability aspects, and identify opportunities for continual improvement at each stage of the project
- Define and document roles and responsibilities
- Describe how the environmental management and wider sustainability requirements are incorporated into the over-arching project management system including procurement, design, construction management, training, communication, and assurance.

Project description

1.3.1 Location

The Reading Sewage Treatment Works is located within the Reading Southern Gateway, a major regeneration area positioned between Reading town centre and the M4 motorway corridor. The site lies close to the A33 Relief Road, a primary transport route serving the southern approach to Reading.

The current treatment works occupies a 10-hectare site developed as a modern replacement for the former Manor Farm Sewage Treatment Works. This new site, owned by Reading Borough Council, is situated approximately 400 metres south of the historic facility

The Reading Sewage Treatment Works forms a key part of Reading's wastewater management infrastructure. The site was constructed following extensive land remediation, which included the removal of sludge and domestic waste from former disposal lagoons and the installation of groundwater control systems to prepare the land for redevelopment. These measures were undertaken due to historic uses of adjacent land, which had included sludge disposal, domestic waste management, and later material-recycling operations.

The facility supports wastewater treatment processes for the wider Reading area and has been designed and delivered through collaboration between Thames Water, Reading Borough Council, and development partners as part of the wider regeneration of the Southern Gateway.

The surrounding area includes long-established operational and industrial land uses, including waste-management and recycling sites, which indicates that vehicular access is supported by existing service-level infrastructure within the local industrial network.

The site lies within the existing boundary of the Atomic Weapons Establishment (AWE) Burghfield, located at Burghfield, near Reading, Berkshire. AWE Burghfield is a secure Ministry of Defence (MoD) site and forms one of AWE's two principal operational locations in Berkshire, the other being AWE Aldermaston approximately 10 miles to the south-east. Appendices 13 and 14 address the emergency actions necessary if an incident occurs at this MoD site.

Appendix 2 is a location map indicating:

- Site boundary
- Local road network
- Neighbouring properties
- Known sensitive receptors / site sensitivities
- Site access points
- Location of key site arrangements: cabins, parking, haul routes, waste management area, wheel washing facilities, fuel and COSHH storage

Details relating to the project environmental sensitivities / sensitive receptors and management arrangements [are set out in the project environmental management site plan appendix # / GIS] [will be established in the construction phase EMP].

1.3.2 Project description

The proposals involve the provision of a new operational building within a separate fenced compound with car parking area in the northwestern corner of the STW site.

The proposed operational control building is required to provide capacity to support increased monitoring demands in line with OFWAT requirements and will be located on an existing hard-surfaced depot area located within the northwestern corner of the operational Reading STW site adjacent to Island Road.

The proposed building is rectangular in shape and measures 22.2m x 16m externally with a gross external area (GEA) of approximately $2 \times 354\text{m}^2 = 708\text{m}^2$. The building will be 9.2m high with a flat roof incorporating integrated solar panels.

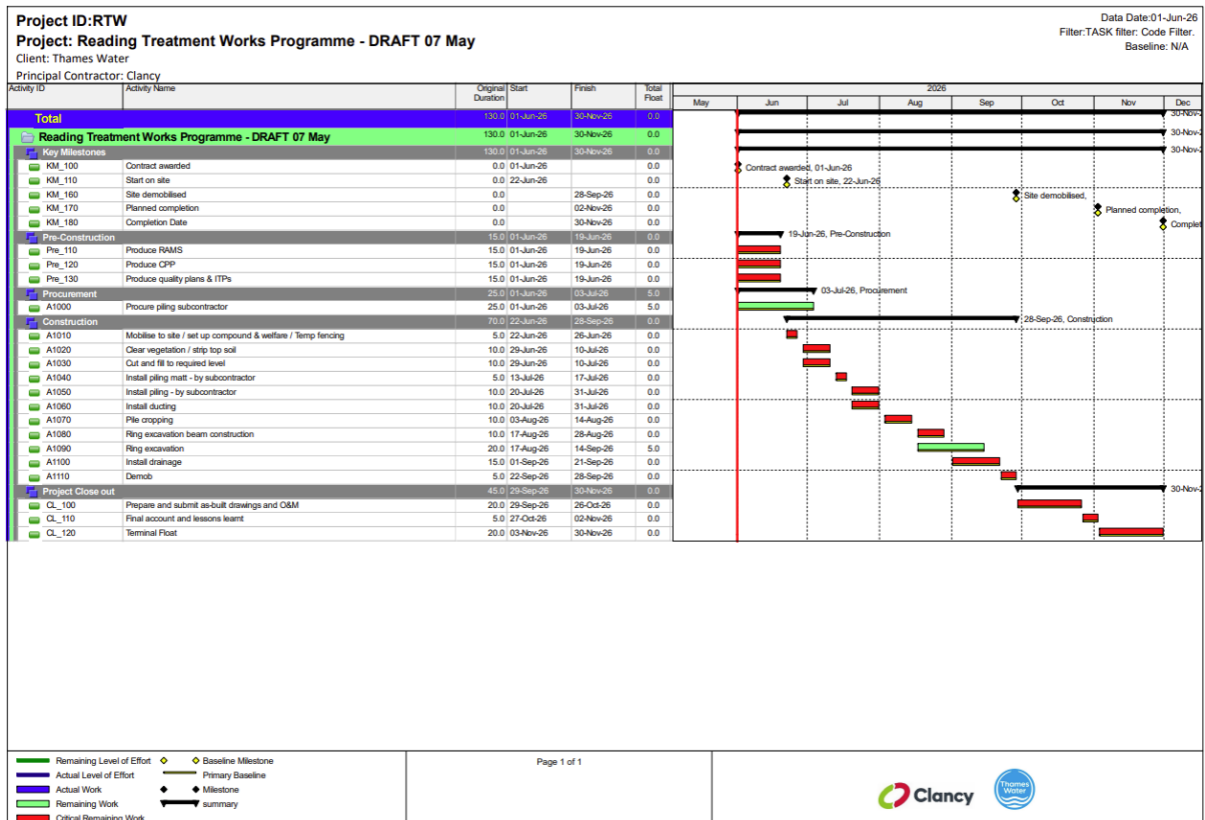
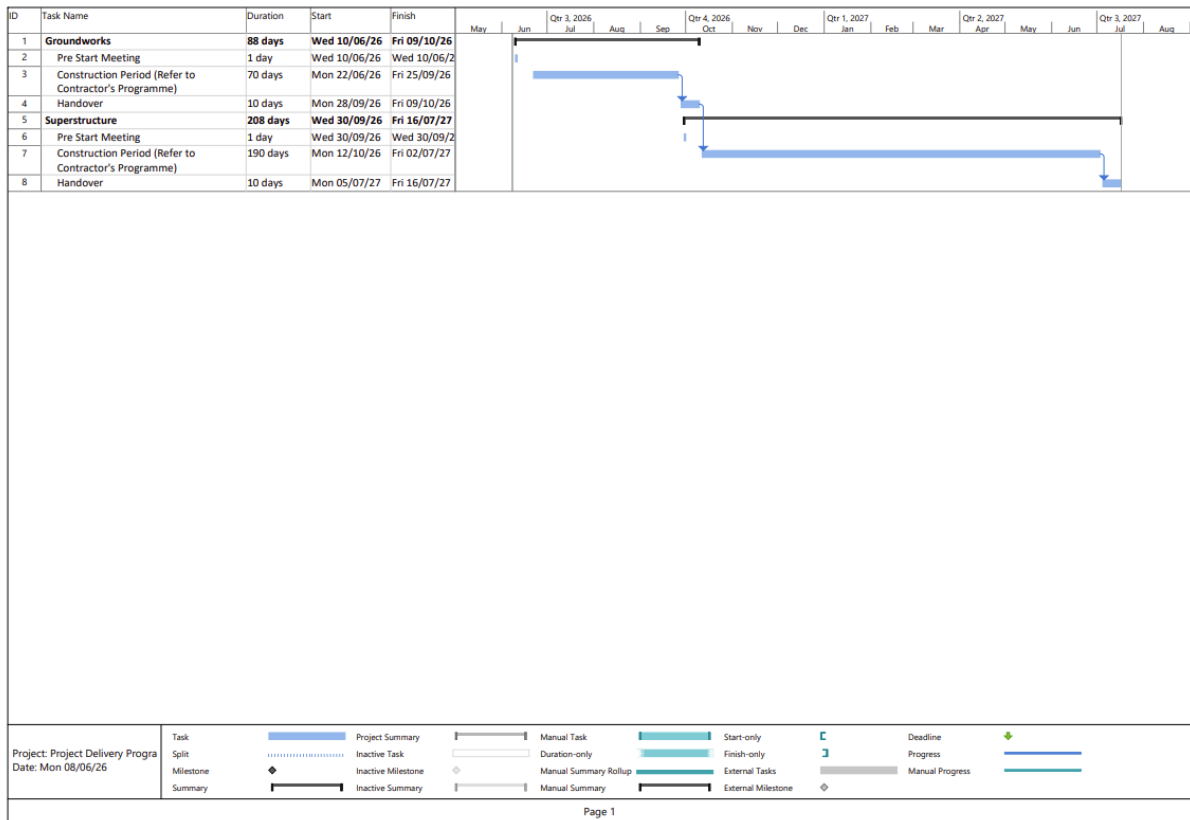
The building will have an external emergency stair and substation on the eastern elevation along with a combined smoking shelter and cycle store and bin store on the southern elevation.

The building will be constructed of insulated concrete formwork (ICF) with a metal mesh cladding to the upper half of the building set 3m from ground level. The metal mesh cladding will also encapsulate the external staircase. The foundations are a piled ground beam system with suspended hollow core precast concrete planks to ground and first floor and roof level. Internally will be all new finishes and M&E in line with Thames Water's building standards requirements.

The proposed building and parking area is to be largely constructed on an existing hard surfaced area. However, to create a secure fenced compound some of the landscaping along the western and northern boundaries will need to be cut back. The majority of the landscaping will be retained so any impact will be minimal. The fenced compound will measure 1,789m². The car park area will incorporate 15 spaces including 3 EV charging spaces and 2 disabled spaces.

The new building and parking area will be secured by a new weldmesh fence measuring 3m in height with a 0.9m flat wrap barbed tape topper. Vehicular access to the car park area will be via a bifold speed gate and pedestrianised access is via a turnstile with an additional accessible gate. External lighting will be provided to the car park area along with bulkhead lighting above the emergency exits.

1.3.3 Project programme



1.3.4 Site boundary

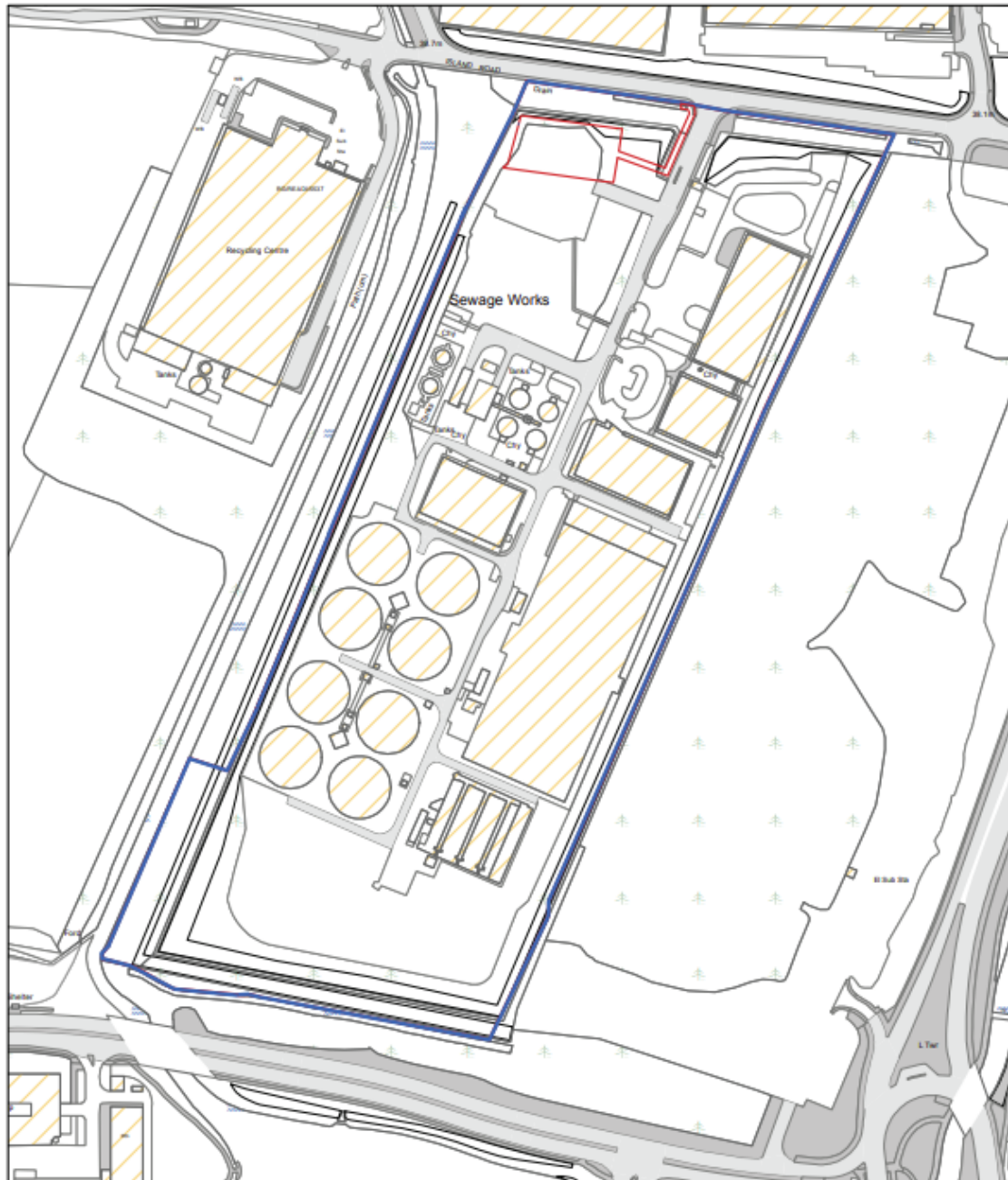


Figure 1: showing redline boundary of new operations building with associated infrastructure and car park within the wider context of the Reading STW site

2 Sustainability policy

Thames Water Utilities Ltd's sustainability statement is set out in Appendix 4. The policy documents the following requirements, in line with ISO14001:2026:

- Sets out the framework for project objectives and targets
- A commitment to sustainability and the protection of the environment, including prevention
- A commitment to continual improvement

3 Roles and responsibilities

The project team's roles and responsibilities for environmental management are set out and communicated in line with the project management plan in job descriptions. Some specific duties are set out in the operational control plans, and in the consents tracker.

Key responsibilities are:

Table 1: Roles and Responsibilities	
Role	Key responsibilities for environmental management
Project director [note that this relates to ISO14001:2026 5.1 requirements]	Overall accountability for providing strategic direction, and the delivery of the effectiveness of the environmental management system, including to achieve legal and contract environmental management and wider sustainability requirements Make available appropriate resources for the implementation of the CEMP Demonstrate visible leadership that directs and promotes the implementation of the legal and contract requirements for environmental management through the CEMP Empower the project team to deliver the CEMP Lead on client / employer senior level stakeholder management in relation to environmental management and wider sustainability contract requirements, risks and opportunities Implement sustainability into overall project decision-making considerations, (including procurement, scheduling/programme controls, design/engineering, and construction), along with safety, cost and programme Use data from project management reporting and assurance to understand environmental management and wider sustainability risks, opportunities, and performance, and take appropriate action to achieve continual improvement
[Commercial director]	
Project manager	Overall responsibility for making sure that the project programme and construction activities are planned and delivered in compliance with the CEMP Understand and implement the requirements of the CEMP Work closely with the environment manager and seek advice and input to decision-making

	Communicate the CEMP and its requirements to workforce and suppliers, including consent and other legal requirements, understanding of sensitive receptors, and operational control requirements Ensure that workforce and suppliers are competent in environmental management and the requirements of the CEMP for the work they are undertaking Support environmental management assurance processes Support the reporting and investigation of incidents and lessons learnt.
[Engineering / design manager]	In consultation with the environment manager implement the environmental sustainability requirements into the design programme and deliverables Ensure that the design / engineering team are competent and appropriately resourced to implement the environmental sustainability requirements Support the environment manager in the delivery of the BREEAM assessment
[Procurement / supply chain manager]	In consultation with the environment manager implement the environmental sustainability requirements into the procurement programme and deliverables, including subcontracts Ensure that the procurement team is competent and appropriately resourced to implement the environmental sustainability requirements Support the environment manager in the delivery of the BREEAM assessment
[Programme controls / planner / scheduler]	In consultation with the environment manager integrate the environmental sustainability requirements into the project programme [schedule] including appropriate and realistic timescales for consent applications and discharge, seasonal constraints, and associated risk
Supervisor / site engineer	
Environment / sustainability manager	Provide advice and support to the project team to ensure legal compliance In consultation with other project disciplines integrate an environmental management system integrated with the project management system

	Undertake assurance of the management system arrangements and provide data and reporting to the project leadership team to inform decision-making
[specialists – N&V, ecology, archaeologist, etc]	
[Community manager / ALO]	
[Communications manager]	
[any other contractual named roles]	

4 Management of risks and opportunities

4.1 Project aspects, impacts and risks

The project Sustainability Statement (section 5 of the Design and Access Statement – Appendix 4) specifically for the building sets out the high-level common environmental management and wider sustainability aspects, impacts, risks and opportunities for the project activities. The register is used to identify the high-level mitigation requirements including the relevant operational control plans.

The key aspects and impacts for the project are defined by a scoring system based on the likelihood and severity of the event (risk).

The [register / matrix] is reviewed monthly to take account of project progress and scope.

The sensitive receptors will be set out in the project environmental management site plan ([Client / PC to insert at a later date for GIS plan] / appendix #)).

Any aspects, impacts, or opportunities scored as high risk in the [aspects register / [matrix] will be recorded in the project risk management register which will be managed in accordance with the project risk management procedure ([Client / PC to insert at a later date]).

4.2 Compliance obligations

4.2.1 Contract requirements

The contract requirements relating to environmental management and wider sustainability will be set out in the technical specification / section [Client / PC to insert at a later date] of the [contract].

The planning application for this proposal is currently with the Planning Officer of Reading Borough Council, and a decision is expected on 19th June 2026.

4.2.2 Environmental statement mitigation requirements

The Ecological Impact Assessment (EclA) report (Maydencroft, April 2026) concluded that the proposals are unlikely to adversely affect protected species subject to the implementation of a range of mitigation measures provided within the report. These measures included a pre-commencement survey for badgers and bats, vegetation clearance outside of bird nesting season, lighting restrictions during and post construction, and a phased clearance of vegetation with hand tools, including ecological supervision where necessary.

4.2.3 Register of legal and other requirements

A register of all applicable legislation, including relevant standards, codes of practice and guidelines has been compiled and is held at Thames Water Utilities Ltd's head office. The Thames Water Utilities Ltd register is used to compile the project register of legal and other requirements (appendix #) which lists relevant environmental legislation and standards that may impact on the works activities, according to the identified environmental risks.

The project register is updated every six months by the environment / sustainability manager and where significant change occurs in the legislation appropriate notification shall be given to site management and appropriate amendments made to project procedures, documentation and general arrangements.

4.2.4 Consents management

Consents include licences, permits, planning consents and permissions, and other permissions from statutory bodies and other stakeholders. [Consents will be managed in accordance with the project consents management plan [(Client / PC to insert at a later date)]]]. Consents are tracked in the project consents tracker [(Client / PC to insert at a later date or appendix)].

In addition to the main town planning, highways, and land access consents (set out in the project consents tracker) Thames Water Utilities Ltd is responsible for managing the following construction-phase environment consents:

Table 2: Consents management			
Consent type	Activity/location	Consent granting body	Owner
Flood risk assessment			
Discharge consent			
Protected species			

4.2.5 Undertakings, assurances, commitments

The undertakings and assurances made during the consultation phase of the planning application, relevant to the project, are set out in the U&A register [(Client / PC to insert at a later date / appendix)]. Consents are managed in accordance with the U&A management procedure [(Client / PC to insert at a later date)].

4.2.6 BS EN ISO14001:2026

The project management system has not been certified to ISO14001:2026 but will be designed to meet its requirements. The project undertakes assurance against the standard accordingly and requires its suppliers to operate management systems that also comply with the standard.

4.2.7 BREEAM [and other assessment schemes]

[The project is registered as a BREEAM whole project award etc]

4.2.8 Considerate Contractor Scheme (CCS)

Thames Water Utilities Ltd will require its PC to register with the CCS.

4.2.9 Environmental good practice on site guide, CIRIA (C811):

Thames Water Utilities Ltd complies with the principles of the CIRIA guidelines, which include:

- Keep the site tidy and clean
- Ensure that no wind-blown litter or debris leaves the site
- Keep hoarding tidy - repair and repaint when necessary, removing any fly posting or graffiti
- Frequently brush-clean wheel washing facilities and keep haul routes clean from site derived materials
- Keep roads free from mud by using a road sweeper
- Ensure the site is secure.
- [anything else from C811? RR to review]

5 Targets and objectives

Project targets and objectives have been identified as appropriate to the potential impacts and baseline assessments and are set out in the project Sustainability Statement (section 5 of the Design and Access Statement)

Progress is recorded in the sustainability strategy tracker ([Client / PC to insert at a later date]) and performance is reported to SLT in the project [monthly progress report].

Progress and performance are reviewed during the project management review, and targets and objectives are revised and updated in line with the project progress and impacts.

6 Training, competence, awareness

6.1 Training and competence management

Training and competence for environmental management and wider sustainability requirements is managed in line with the project training and competence procedure ([Client / PC to insert at a later date]). The training and competence requirements for each project role are set out in the project training and competence matrix ([Client / PC to insert at a later date]). This includes formal professional qualifications, training, and experience in environmental management and sustainability including:

- ISEP membership (and other professional memberships)
- Protected species licences
- Incident investigation
- Carbon literacy
- BREEAM assessor
- Waste management
- [insert]

6.2 Project specific training and awareness

In addition to professional and technical competence requirements the project team delivers the following training and awareness specific to the environmental sensitivities and receptors and the project scope and programme. Wherever possible the training is integrated into the overall project SHEQ training programme and arrangements, and recorded in line with the project training and competence procedure ([Client / PC to insert at a later date]):

Table 3: Project specific training and awareness		
Training / awareness	Audience	Owner
Site induction	All project staff including direct employees and suppliers	Site Manager
Task briefings	Workforce including direct employees and suppliers delivering the task	Supervisor
Toolbox talks in relation to the project environmental management sensitivities and aspects, and also following incidents or events	Workforce including direct employees and suppliers	Project manager

Pollution prevention and response	Workforce including direct employees and suppliers delivering the task	Environment manager
Project managers sustainability training	Project managers and technical / discipline leads including direct employees and suppliers	Environment manager
Supervisor sustainability training	All project supervisors including direct employees and suppliers	Environment manager
[insert]		
[insert]		

Thames Water Utilities Ltd will expect the PC to be a member of the Supply Chain Sustainability School, and a specific learning pathway has been created for the project team. Participation in the learning pathway is a project KPI and is recorded and reported to the project director each month by the environment manager.

7 Communication

7.1 Internal communication

Internal communication in relation to environmental sustainability is undertaken in accordance with the project management plan ([Client / PC to insert at a later date]). The key arrangements are [consult with project manager]:

Table 4: Internal communication			
Format	Purpose	Participants	Frequency
Senior leadership project progress meeting and report	Report performance, progress, risks, support needed to senior leadership team	Project directors Project manager Environment manager	[Monthly]
Employer / client environmental sustainability meeting	Technical discipline progress meetings	Environment technical / discipline leads	[Monthly]
Project progress meeting	Attend to understand project progress, change, risks, opportunities in relation to sustainability	Project management team Environment manager	[Weekly]
Project environmental sustainability progress meeting and action tracker	Inspection actions; incident actions; improvement programmes	Project manager Environment manager Environment technical specialists	[Weekly]
Incident progress meeting	Review incidents and events and progress of investigations	Project manager Supervisor Environment manager	[Weekly]
[sustainable design, carbon management, BREEAM]			
[Community engagement, land access, ALO,			

social value: EDI, SEE, volunteering]			
Project team communications: newsletter, incident alerts, team briefings		All project employees including suppliers	
Case studies		All project employees Suppliers Client Wider industry	

7.2 External communication

Arrangements for project external communications, are set out in the [external communication/ stakeholder / community / social value management plan ([inert doc ref])].

The arrangement include:

- Identification of stakeholders and stakeholder mapping
- Potential impacts and opportunities including traffic, transport, public rights of way, nuisance, and social value
- Community relations and notification
- Consent granting bodies including local authorities
- Public relations and media
- Undertakings, commitments, assurances and other private agreements
- Management of complaints, enquiries, and freedom of information requests
- Landowners and agricultural liaison
- Social value: community engagement, local procurement, EDI, SEE, employee volunteering and community giving
- Considerate Constructor Scheme (CCS) registration and progress
- Other stakeholder management arrangements

8 Documentation

Documentation is managed in accordance with the project document management procedure ([Client / PC to insert at a later date]). The CEMP and associated documents are set out in the environmental sustainability document tracker including review dates ([Client / PC to insert at a later date / appendix]).

9 Operational planning and control

Operational control for the identified environmental management aspects, impacts and opportunities is implemented as follows:

- Defining roles and responsibilities
- Training, awareness and competence
- Implementing management plans relating to project environmental objectives as set out in the sustainability strategy and action plan
- Operational control plans
- Implementing the operational controls plans in the planning and delivery of the work package plans / RAMS [PC work planning / methodology docs] and project stage gate process (Client / PC to insert at a later date)
- Sustainable design
- Procurement and management of the supply chain
- Monitoring compliance through assurance
- Administration of the contract and subcontracts including the communication of change, risk, technical queries, programme, cost impacts

9.1 Operational control plans

The [aspects register / environment management matrix] sets out the key aspects and impacts of the project in relation to the sensitive receptors and the work activities undertaken. Operational control plans have been developed for each of the aspects and impacts.

The plans include:

- Legal and other requirements
- Aspects, impacts, risks: site sensitive receptors and activities
- Roles and responsibilities
- Control measures
- Assurance and reporting

The operational control plans for the project are set out in the EMP documentation tracker ([Client / PC to insert at a later date / appendix]), in summary:

Table 5: Operational control plans	
Operational control plan	Document reference
Carbon management	[insert]
External communications	[insert]

Ecology, landscape, BNG	[insert]
Ground water, surface water, CL	[insert]
Incident management	
Air quality	
Sustainable design & procurement	
Site waste management	

9.1.1 Ecology

The Ecological Impact Assessment (EclA) report (Maydencroft, April 2026) concluded that the proposals are unlikely to adversely affect protected species subject to the implementation of a range of mitigation measures provided within the report. These measures included a pre-commencement survey for badgers and bats, vegetation clearance outside of bird nesting season, lighting restrictions during and post construction, and a phased clearance of vegetation with hand tools, including ecological supervision where necessary.

9.2 Construction management

9.2.1 Programme

The PC is responsible for consulting with the environment / sustainability manager monthly to review the construction programme and to take account of the following:

- Ecological seasonality
- Consent applications timescales including consultation, determination periods, and the discharge of conditions
- Pre-commencement activities such as habitat creation, mitigation, surveys, baseline monitoring
- [insert other]

9.2.2 Construction methodology (RAMS/WPPs)

The PC is responsible for consulting with the environment / sustainability manager regularly to review the RAMS/WPPs schedule to identify high-risk activities, as determined by the impacts register [environmental management matrix] and the sustainable design and procurement tracker.

The environment / sustainability manager reviews and approves the RAMS/WPPs for the high-risk activities to ensure that the following information has been included and considered, specifically for the scope of works planned:

- Environmental sensitivities / sensitive receptors

- Operational control requirements in line with the operational control plans, including mitigation requirements
- Consent conditions, including plant, equipment and working hours, mitigation and monitoring requirements
- Roles and responsibilities
- Emergency arrangements

9.2.3 Management of subcontractors and other suppliers

The management of suppliers, including subcontractors, is set out in the project management plan (insert reference). This includes:

- The communication of the project environmental management and wider sustainability requirements (including this CEMP, associated documents, and reporting/data requirements) through the procurement process, the subcontract agreement, and subsequent formal instructions
- Pre-start meetings and briefings
- Monitoring and reporting requirements
- Review and acceptance of supplier documents including WPPs/RAMS
- Training and competence
- Assurance arrangements including audit and site visits

Subcontractors are required to implement the arrangements set out in this CEMP and are expected to have in place a management system that meets the requirements of ISO14001:2026 (although certification of the arrangements is not expected).

If a supplier is not able to meet the requirements of the CEMP this can be raised formally via the contract mechanisms and considered accordingly (for example, a requirement for training or other support, particularly for SME suppliers).

9.3 Incident management and investigation

Incidents are managed in line with the project incident management procedure. This sets out the arrangements for:

- Legal and other requirements
- Aspects, impacts, risks: site sensitive receptors and activities
- Roles and responsibilities
- Control measures
- Emergency response
- Reporting and investigation
- Assurance and reporting

10 Performance evaluation

10.1 Monitoring, measurement, analysis and evaluation

Thames Water Utilities Ltd requires the PC to report environmental sustainability data as required by the client standard [insert client requirement].

Thames Water Utilities Ltd communicates reporting requirements for the supply chain in the subcontracts. Supplier data is submitted to Thames Water Utilities Ltd in [insert details of reporting requirements].

Data is collated from the following monitoring arrangements:

Table 6: Monitoring, measurement, analysis and evaluation	
Data	Analysis and evaluation
Assurance findings including site visits (inspections) and audits	trends and close out of actions
Sustainability strategy tracker	Progress and performance against targets, objectives and KPIs
Incidents	trends, reporting timescales, and close out of actions
Supplier data	trends, on-time and completeness of submissions
Consent submissions	On-time submissions and determination progress
[other]	

Data analysis and evaluation is undertaken by the environment manager and presented in the [monthly management report] along with recommendations for support or business improvement.

10.2 Assurance

Assurance is undertaken and recorded in line with the project management plan / procedure [Client / PC to insert at a later date]. Assurance activities are planned proactively as appropriate to the nature and scale of the project activities, and also reactively in response to incidents or other events and risks. These assurance activities are undertaken as a minimum and wherever possible are undertaken as:

- A combined SHEQ exercise
- Engagement and behaviour based

[adapt in consultation with the client]:

Table 7: Assurance		
Type of assurance	Attendees	Frequency
Site visit: compliance and engagement	Environment manager Project manager	Monthly
Site inspection: compliance and engagement	Site manager	Weekly
Senior leadership visit: compliance and engagement	Project director	Quarterly
Site visit: consent conditions / monitoring	Consent granting body or other statutory body / stakeholder	Monthly
WPP / RAMS audit: desk-based compliance check and site verification against the operational control plans and consent conditions	Environment manager Project manager Supplier project manager Technical specialist	Monthly
Technical assurance review: desk-based compliance check and site verification of the operational control plans and related consent conditions	Environment manager Project manager Supplier project manager Technical specialist	Monthly
Incident investigation progress	Environment manager Project manager Supplier project manager	Weekly
Environmental management system review: compliance check in preparation for management review: • Assurance and monitoring findings, consents tracker, incidents, audits, reporting, documentation compliance • Identify changes or potential changes, to the project	Environment manager	Annually

context, legal or contractual requirements High level RAG review against ISO14001:2015 Actions are recording in the environmental sustainability action tracker		
Management system audit – internal	Environment manager Internal project / parent company auditor	Six-monthly
Management system audit - external	Environment manager Senior leadership team External auditor (parent company / client)	Annually
Client audit	Environment manager Senior leadership team Client auditor	Annually / monthly
Considerate Contractor Scheme audit	Environment manager Project manager CCS inspector	Annual

10.3 Management review

The project team undertakes management review in line with the project management review procedure ([Client / PC to insert at a later date]) and through the following activities:

Table 8: Management review			
Meeting	Report	Attendees	Frequency
Project progress meeting	Sustainability progress report	Project director SLT Environment / sustainability manager	Monthly
Management review	Environmental management system review	Project director SLT	[Six monthly / annually]

		Environment / sustainability manager	
SHEQ / assurance progress review	SHEQ / assurance report	Project director SLT Environment / sustainability manager	[monthly]

The management review process allows SLT to demonstrate senior-level engagement and leadership through the consideration of:

- Progress and performance against targets, objectives, KPIs
- Compliance and assurance
- Threats
- Opportunities
- Support needed (problem statements and business cases presented) including escalation, resources (staff, funding)
- Management system changes required

10.4 Nonconformity and corrective action

Nonconformity and corrective actions are generated from the assurance activities set out in 10.2. Nonconformity and corrective actions are managed in line with the project management plan arrangements ([Client / PC to insert at a later date]), including:

- Definition of non-conformance from assurance activities, such as site inspection and audit findings
- Timescales for close out of findings or non-conformance
- Reporting, recording and tracking of findings, non-conformance, and corrective action [in the project assurance tracker or audit tracker or similar]
- Data analysis and evaluation of findings and non-conformance

Progress and performance are reviewed at least monthly by the environment manager and project manager to identify trends and risks, and to monitor the close out of findings. This is reported to the project senior leadership team in the monthly sustainability report.

10.5 Continual improvement and lessons learned

Continual improvement and lessons learned is demonstrated through the following:

Table 9: Continual improvement and lessons learned			
Activity	Report / output	Owner	Audience / participant
Assurance and reporting activities set out in 10.2	Sustainability progress report	Environment manager	SLT Client
Best practice and innovation, and other achievements	Case studies ([Client / PC to insert at a later date for case study tracker])	Environment manager	Project employees Suppliers Client Other stakeholders External comms and awards
Incidents and assurance findings and investigations	Alert	Environment manager	Project employees Suppliers Client
Incidents and assurance findings and investigations	SLT panel / collective insights	SLT	SLT Client

Appendix 1 : Cross-reference matrix, ISO 14001:2026

ISO 14001:2026		EMP section
4. Context of the organisation	Understanding the organisation and its context	1. Introduction
	Understanding the needs and expectations of interested parties	
	Determining the scope of the EMS	
	EMS	
5. Leadership	Leadership and commitment	2. Policy
	Environment policy	3. Roles and responsibilities
	Organisational roles, responsibilities and authorities	
6. Planning	Actions to address risks and opportunities	4. Management of risks and opportunities
	Environmental objectives and planning to achieve them	5. Targets and objectives
7. Support	Resources	3. Roles and responsibilities
	Competence	6. Training, competence, awareness
	Awareness	
	Communication	7. Communication
	Documented information	8. Documentation
8. Operation	Operational planning and control	9. Operational planning and control
	Emergency preparedness and response	
9. Performance evaluation	Monitoring, measurement, analysis and evaluation	10. Performance evaluation
	Internal audit	
	Management review	
10. Improvement	General	
	Nonconformity and corrective action	
	Continual improvement	

Appendix 2 : Location Map

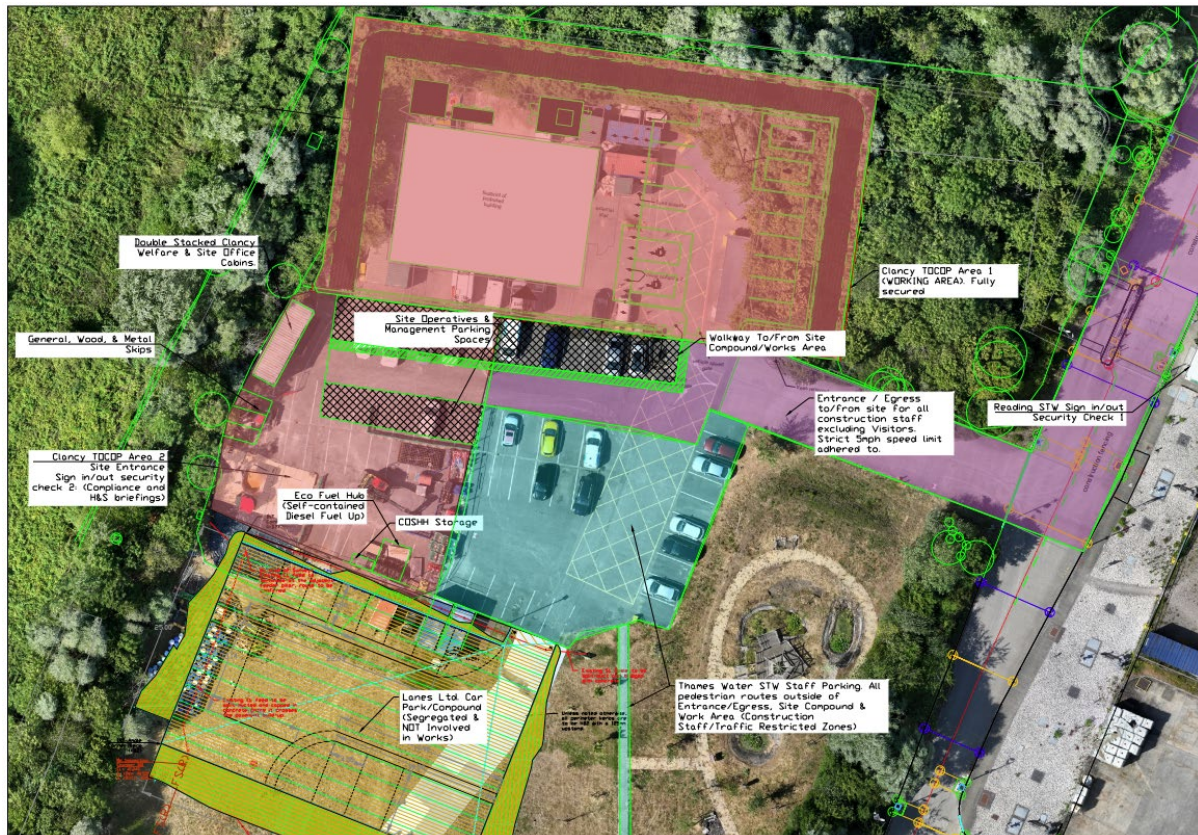


Figure 2: showing Reading STW groundworks site layout

Appendix 3 : Site Plan

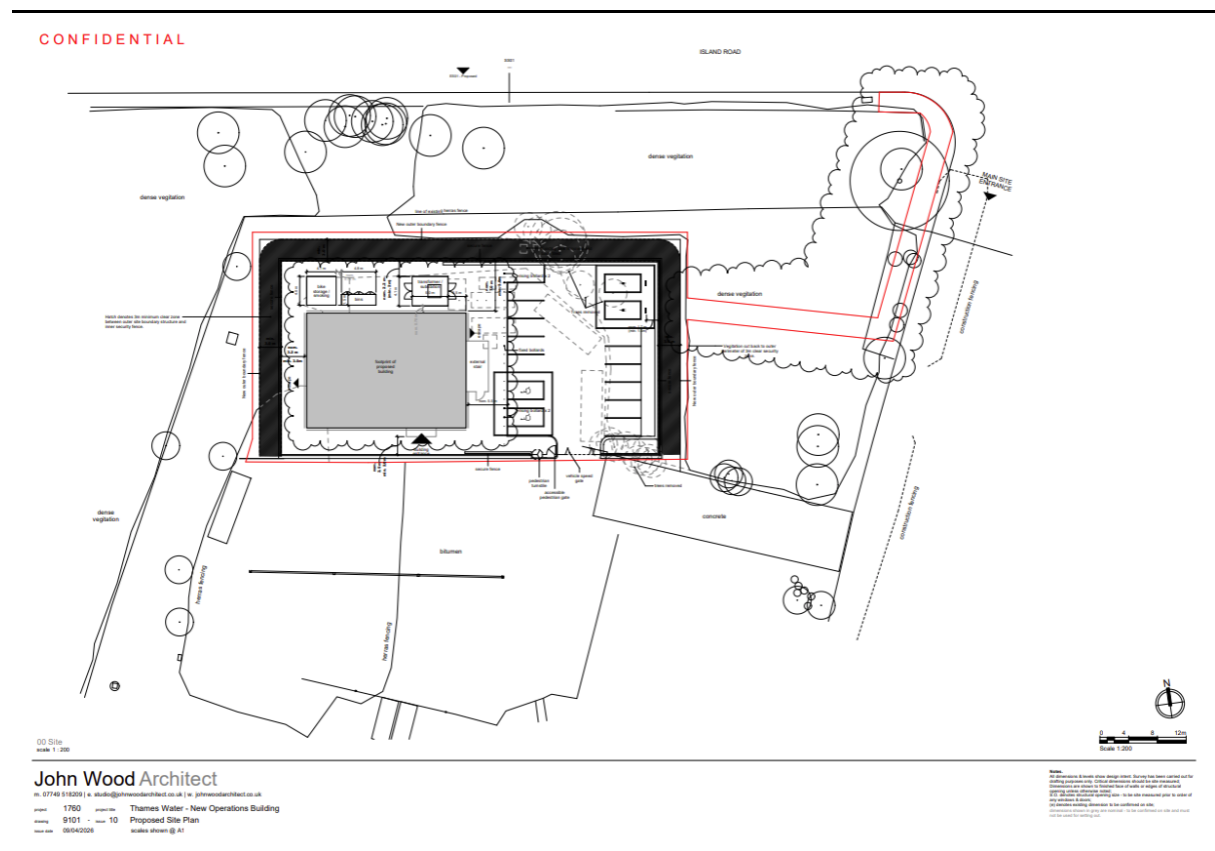


Figure 3: showing proposed site plan of new operations building at Reading STW

Appendix 4 : Sustainability Statement

5. Sustainability Statement

5.1 Character, Built Form and Site Layout

5.1.1 Intensifying an existing development -

The proposal prioritises the reuse of previously developed land on an existing site providing fully accessible workspace for around 20+ people as well as a meeting and amenity spaces.

5.1.2 On-site amenities including external amenity space -

The proposed development enjoys access to an existing outdoor amenity space which reduces the need for employees to travel off-site. In addition to this provisions will be made within the new development for cycle storage and electric vehicle parking (see sustainable travel).

5.2 Building design

5.2.1 Fabric energy efficiency -

The building is to be constructed using an insulated concrete frame (ICF) system which offers excellent thermal insulation and air tightness characteristics.

5.2.2 Materials -

The ICF system provides excellent durability, noise and fire resistance ensuring that the structure is capable of providing a high quality internal environment for use as an office space or a variety of other uses for the lifetime of the structure. BBA certification states a service life for the structural material which is in excess of 60 years.

The primary external facing material is grey render which is durable and easily repaired. At high level the building will be over-clad with a decorative stainless steel mesh cladding.

In order to optimise durability glazing will have metal frames.

5.2.3 Water efficiency -

Water saving plumbing fixtures will be used throughout.

5.2.4 Use of modern methods of construction (MMC)

Use of MMC reduces on site activities which has the following environmental benefits:

- Reduction of on-site construction waste, off-site waste can be more easily sorted, reprocessed and reduced.
- Reduction of on site traffic and temporary amenities.
- Reduced demand for temporary buildings and facilities for workforce during construction of new building.

5.2.5 Construction waste -

ICF systems typically generate less than 1% waste on site where the monitoring, sorting and sustainable processing of waste is challenging.

5.2.6 Operational waste -

Space has been provided for the sorting of operational waste to facilitate recycling.

5.2.8 Daylight and ventilation -

The technical nature of the building requires a highly controlled environment without daylight or natural ventilation. Low energy bio-adaptive lighting will be installed throughout operational areas to mimic changes in light temperature across the day to ensure building user well-being. Energy efficient mechanical ventilation systems will be used.

5.2.9 Heating -

Heating systems will be served by heat pumps which avoid dependency on gas or oil and reduce embodied carbon with potential for it to be further reduced with improvements to national electricity infrastructure in the future. Use of heat pumps is also complementary to the installation of solar energy (ref. paragraph 7.2.10).

5.2.10 Sustainable technologies -

The building has been designed with an accessible, flat roof with edge protection to facilitate the incorporation of an approx. 140sqm array of solar panels. A generous provision of plant space provides space for on site electricity storage which will reduce dependence on the main supply at peak times.

5.2.11 Future adaptability -

The plant room has been oversized based on current need to ensure future flexibility. Careful consideration has been given to providing good access for lifting equipment to plant spaces, ensuring safe maintenance and replacement of plant in the future.

5.3 Sustainable travel

5.3.1 The proposals include the provision of cycle storage comprising 6 Sheffield stands, under cover. As the store is within the fence line of the site it does not require its own secure enclosure.

5.3.2 It is proposed to install electric vehicle charging to serve 2 vehicle parking spaces.v

Appendix 5 : Roles and Responsibilities

[Insert or delete appendix if full R&Rs provided in section 3]

Appendix 6 : Aspects Register

[Insert or delete appendix if doc ref has been provided in the document]

Appendix 7 : Register of Legal and other Requirements

[Insert or delete appendix if doc ref has been provided in the document]

Appendix 8 : Consents Tracker

[Insert or delete appendix if doc ref has been provided in the document]

Appendix 9 : U&A Tracker

[Insert or delete appendix if doc ref has been provided in the document]

Appendix 10 : Sustainability Strategy

[Insert or delete appendix if doc ref has been provided in the document]

Appendix 11 : Sustainability Strategy Tracker

[Insert or delete appendix if doc ref has been provided in the document]

Appendix 12 : Environmental Management & Sustainability Documentation Tracker

[Insert or delete appendix if doc ref has been provided in the document]

Appendix 13: Construction Phase Emergency Action Plan

CONSTRUCTION PHASE EMERGENCY ACTION PLAN FOR THE PROPOSED SCC WITHIN READING STW

**IN THE EVENT OF AN INCIDENT AT AWE
BURGHFIELD**
**PLEASE GO DIRECTLY TO SECTION 6 OF THIS
DOCUMENT FOR IMMEDIATE ACTIONS**

READING SEWAGE TREATMENT WORKS
Island Road,
READING

Please note this EAP relates only to the construction phase and related activities of the SCC, which will be a self-contained, self-governing compound within the main site.

TO BE REVIEWED EVERY 2 WEEKS

CONTENTS

- 1 Introduction
- 2 Alerts
- 3 Local Radio and TV Stations
- 4 The Designated Emergency Representative
- 5 Actions of the Designated Representatives
- 6 Actions of Operational Staff and Visitors
- 7 Post Event Actions
- 8 Inventory Checklist
- 9 Flow Diagram

1. Introduction

This document provides an Emergency Action Plan (EAP) applicable to the construction site for the new SCC withing Reading Sewage Treatment Works (STW), Island Road, Reading. The project is likely to have an average attendance of 20 individuals comprising management, trades people and visitors.

Reading STW is a key Thames Water Utilities Ltd. (Thames Water) operational site that provides sewage treatment services to South Reading and the surrounding area. This EAP is to be implemented in the event of a major radiological incident occurring at the AWE Burghfield site, which is located approximately 13.3km southeast of Reading STW. This EAP has been prepared because the development is located within a Land Use Planning Consultation Zone for restricted development.

It should be noted that this EAP addresses radiological incidents only. Other types of events could arise at AWE Burghfield and require off-site actions to be undertaken that would diverge from those set out in this document. This EAP also only addresses the construction phase of the SCC and its staff/visitors, which is autonomous to the main site

The contact details of Thames Water are provided below:

Thames Water Utilities Limited
Clearwater Court

Vastern Road

Reading

RG1 8DB

Tel: 0800 316 9800

This EAP has been prepared based on the Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPiR), information included in the REPPiR leaflet applicable to AWE Burghfield, and with reference to the following documents:

- West Berkshire Council and AWE: REPPiR: What you should do if there is a radiation emergency at the AWE Aldermaston or Burghfield sites (WBC/PP&C/AG/020).
- AWE Burghfield Consequences Report, Issue 1, November 2019.
- AWE Detailed Emergency Planning Zone Report, 19 January 2023.
- It is understood that a public version of the AWE Off-Site Emergency Plan is currently being developed for issue.

This EAP does not seek to replace the information which is provided in the applicable legislation, regulations and guidance. It is to be reviewed on an ongoing basis as necessary.

All Thames Water operational staff and visitors to the construction site will be informed of the EAP and be made aware of the procedures involved in order to respond effectively to any alerts raised and to minimise the risk to other visitors to the site. Information will be relayed when the individual first visits the site by way of a site induction. Information will also be displayed on the site notice board adjacent to the welfare unit. At the point on



induction all staff related to the construction phase will be requested to sign up to the voluntary text message alert system by texting “B” to 0786 003 0391 to register for incident alerts at the Burghfield AWE site.

This EAP will be included within the information provided to new staff and visitors to the project (during the construction phase), during site inductions. This will run for the lifetime of the SCC/Burghfield sites, and Thames Water will ensure it is kept up to date and all operational staff and visitors are kept informed.

2. Alerts

In the event of a major radiological incident that could affect construction related staff and visitors at the SCC, alerts will be made advising us of the actions to be taken. The alerts will be made by:

- A call or other methods of communication (e.g. airhorn, telephone call on a mobile phone, messenger applications etc.); from the Designated Emergency Representative at Thames Water.
- A text message from the emergency alert system at Burghfield AWE.
- An alert on local radio or televisions.
- A member of the emergency services instructing Thames Water operational staff and visitors to Reading STW to take some form of immediate action.

All staff related to the construction phase will be requested to sign up to the voluntary text message alert system by texting “B” to 0786 003 0391 to register for incident alerts at the Burghfield AWE site.

3. Local Radio and TV Stations

There are a number of local radio and TV stations from which Thames Water operational staff will be able to pick up information in the event of a radiological emergency arising.

These include:

- BBC Radio Berkshire – 95.4 and 104.1 MHz FM
- BCC Radio Solent (Hampshire) – 96.1 and 103.8 MHz FM
- Heart Thames Valley – 97.0 and 103 MHz FM
- The Breeze (Newbury) – 105.6 and 107.4 MHz FM
- The Breeze (Berkshire and North Hampshire) – 107.6 MHz FM
- BBC South
- ITV Meridian

4. The Designated Emergency Representative

The primary point of contact for the project (Designated Emergency Representative (DER)) in the event of an emergency incident will be the site-based manager employed by the principal contractor.

The DER, once established, along with the contractor's Project Manager and/or Site Supervisors, will ensure all project related staff present on the construction site are aware of the actions that they should take in the event of a radiological emergency arising.

5. Actions of the Designated Representatives

When alerted by the AWE alerting system or by any alternative method, the DER/Site Manager shall contact all project related staff and visitors within the construction area, immediately once it is confirmed that all personnel have been located, they will be asked to proceed as quickly as possible to the main admin building. The DER/Site Manager will then check the register again to ensure all personnel are accounted for.

In the event of an AWE emergency, the DER/ Site Manager will be available to provide advice and information until the off-site incident is declared to be over. Telephone calls should be kept as short as possible to help keep the lines clear for emergency services. The DER/Site Manager and staff shall make full use of publicly available information to keep up to date on the development of the off-site emergency.

The DER/Site Manager shall contact the Thames Water Incident Manager (based at Kemble Court – 01189531313). Information relating to names and numbers of personnel will be relayed.

The incident response team will also be responsible for issuing updates for the duration of the event. This will initially be via phone then via a Teams room which will be set up by the incident team.

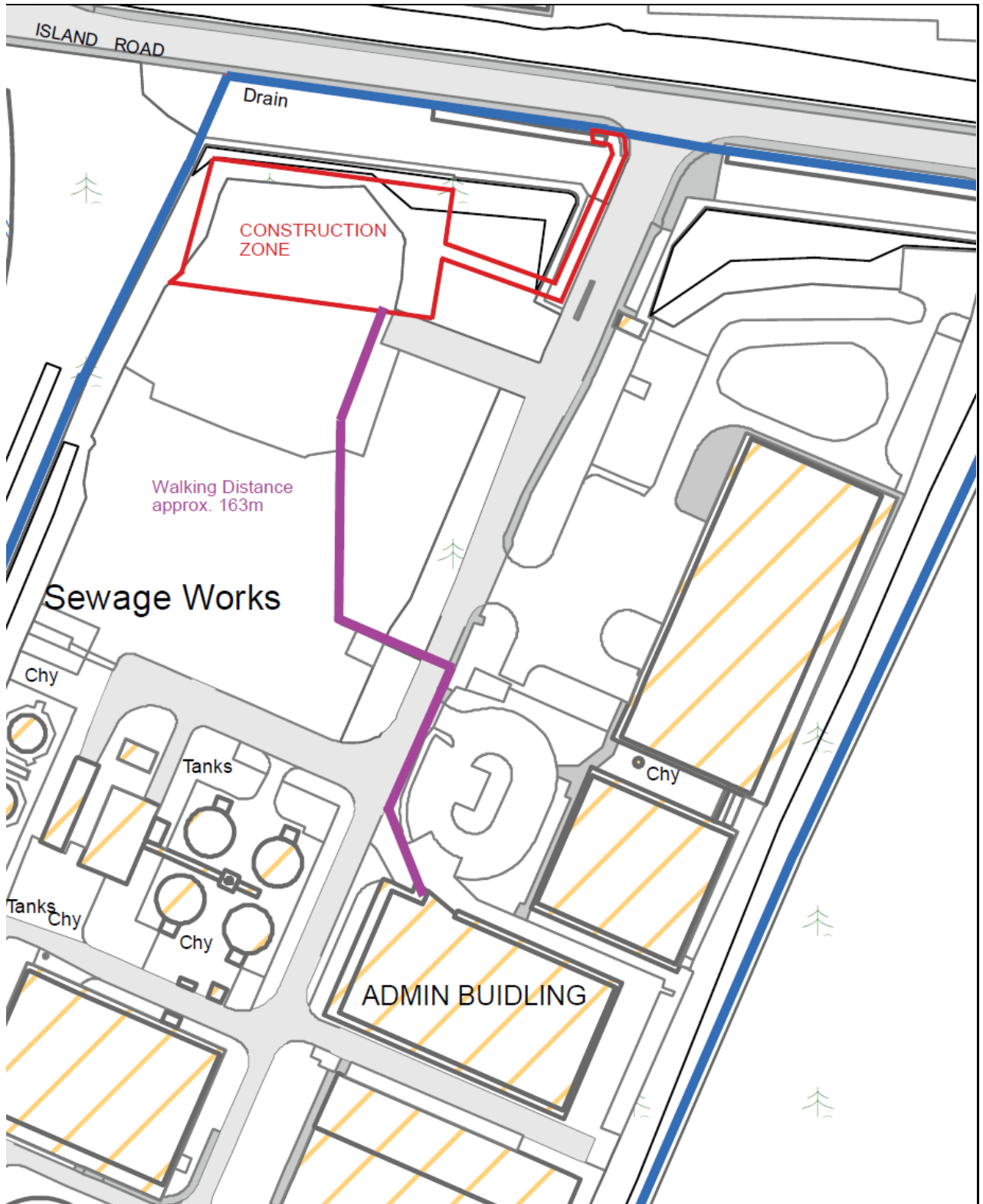
6. Actions of Operational Staff and Visitors

If an alert occurs, the following actions should be taken by both project related staff and visitors at the construction site:

EMERGENCY ACTION PLAN FOR USE IN THE EVENT OF A RADIATION EMERGENCY	
Go In	• Move immediately into the existing admin building as shown in the attached site plan • Remove all PPE/outer clothing prior to entering inside and leave it outside in a marked hazardous waste bag. • Once inside the admin building, sign in and log your name/date/time. Report to your supervisor or the DER once you have made your way to the ground floor kitchen/mess area.
Stay In	• Stay indoors, shut all windows and doors to reduce entry of contamination and stay away from them. • Put out open fires and turn off any fans that could draw in air from the outside. • Thoroughly wash hands and face and any other exposed areas of skin or if possible, have a shower to wash off any material. When washing, avoid getting water into your nose and mouth. Use one of the provided disposable towels provided • Remain calm, please ensure you have signed in and your supervisor is aware you are there. Wait for further advice. • You may want to collect loved ones, e.g. children from school, and ensure their safety, but it might be not safe to do so. Remember that all schools have emergency plans and that all teachers will look after pupils in their care.
Tune In	• Tune in to a local radio station, which will give you further information or instructions, including updates on schools. Your supervisor will give further instructions. • It may be worthwhile checking relevant websites such as local news, schools or councils, to see whether any more information is helpful.

Do not use the phone	Do not use the phone. If you need to use the phone (e.g. to call a Thames Water representative), keep the call as short as possible. This will help to keep the lines clear for use for emergency calls. Do not phone the emergency services or AWE as they will be busy dealing with the emergency. Do not dial 999 unless you have a separate emergency.
Do not leave the area	- Never be tempted to leave the area unless you are told to do so by the emergency services. - You will be safer indoors. If you are outside, you are more likely to be exposed to radioactivity. If you try to leave, you may block the roads for emergency services.

The above notice shall be displayed in a prominent and accessible area at Reading STW.



7. Post Event Actions

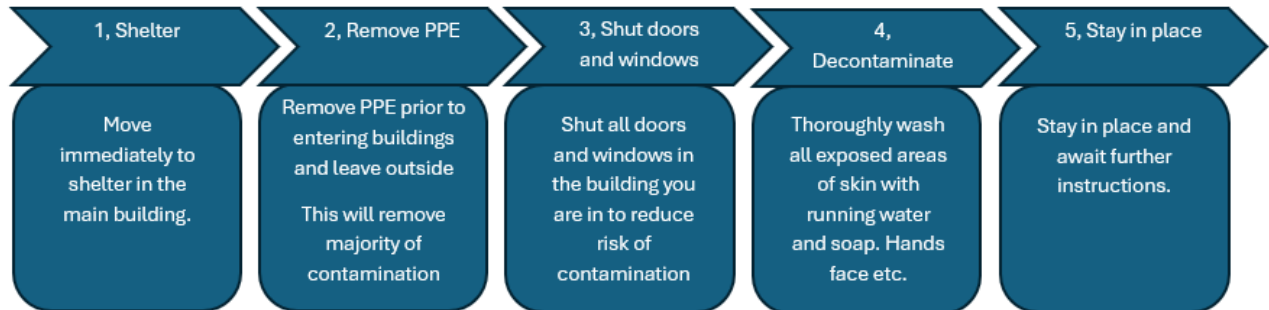
After the event is declared closed by the AWE or emergency services or the TW incident team, the DER shall ensure that the emergency supplies are replenished at the first available opportunity.

Furthermore, as categorised responders under the Civil contingencies act, should an incident occur at AWE that required TW to enact this emergency plan, TW would ensure that any relevant learning was fed into the LA/LRF debrief.

8. List of Emergency Supplies

ITEM	Stock Requirement	Current Stock	Expiry Date
24hr Ration Packs (MRE)	60		
Drinking Water in Litres	180L		
Blue Paper coveralls	60		
Disposable Towels	60		
Hazardous Waste disposal bags	50		
Anti-bacterial Wipes	12 packs		
Tampons	20		
Sanitary Towels	20		
Toothpaste	6 tubes		
Shower Gel	1L		
Face masks	50		
Calculations based on Ration Packs – number of people x 2 days. Water – 3L per person per day x 2 days			

9. Flow Diagram



Appendix 14: Radiation Emergency Actions

RADIATION EMERGENCY ACTIONS

IN THE EVENT OF A RADIATION ALERT – FOLLOW THESE STEPS

■ GO IN	GO IMMEDIATELY TO THE ADMIN BUILDING. REMOVE PPE & SIGN IN.
■ STAY IN	STAY INDOORS. CLOSE WINDOWS & DOORS.
■ WASH OFF	WASH HANDS, FACE & EXPOSED SKIN. SHOWER IF POSSIBLE. USE DISPOSABLE TOWELS.
■ DO NOT USE THE PHONE	KEEP PHONES FREE FOR EMERGENCIES.
■ DO NOT LEAVE	STAY INSIDE UNTIL YOU ARE TOLD IT IS SAFE.

WAIT FOR INSTRUCTIONS – STAY CALM – STAY SAFE