

Pevensey Coastal Defence Ltd



Operational Policy Document

Section 3:

Sustainability Action Plan

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“Managing sea defences to protect and enhance the local Environment”

Section 3 – Sustainability Action Plan

Contents

SUSTAINABILITY POLICY	3
1 Introduction	4
2 Status	5
3 Sustainability Action Plan	6
3.1 Implementation Plan	6
3.2 Economic Viability	8
3.3 Working with Communities	10
3.4 Environmental Limits	13
4 Sustainability KPIs	16

Section 3 – Sustainability Action Plan

SUSTAINABILITY POLICY

Pevensey Coastal Defence Ltd (PCDL) is a special purpose company set up to provide design, construction, and management services to the Pevensey Bay Sea Defence project - aimed at improving and maintaining existing local sea defences.

PCDL is committed to delivering the project in a sustainable manner - taking into account the wider community and environmental implications of its operations, whilst ensuring value for money for its stakeholders.

In order to achieve this policy Pevensey Coastal Defence Ltd will:

- Comply with all applicable legislation, codes of practice and stakeholder-specific requirements
- Encourage safe behaviours throughout the project, and communicate lessons learned to all stakeholders
- Take all necessary measures to prevent direct pollution from its operations, whilst striving to preserve and enhance the quality of the local environment wherever possible
- Promote the efficient use of resources amongst its staff and its supply chain; encouraging innovation and ‘best’ sustainability practices
- Engage with local stakeholders to understand local community needs, providing regular communications to these groups wherever appropriate.

In support of these commitments PCDL has produced a Sustainability Action Plan and has set measurable objectives and targets that will be reviewed by the PCDL Board on a regular basis.

Through working closely with all project stakeholders PCDL believes it can implement this policy - making a positive contribution to the local community and environment – and will report on progress against its sustainability objectives via its website (www.pevensey-bay.co.uk) and other regular communications to stakeholders.

Name: Guy Hardacre

Signature:  Date: 08/06/2011

Chairman of Pevensey Coastal Defence Ltd



Section 3 – Sustainability Action Plan

1 Introduction

Pevensey Coastal Defence Ltd (PCDL) is a consortium of four companies, established in 1997. The group was specifically formed to undertake the 25 year Pevensey Bay Sea Defence Scheme, a Public Private Partnership (PPP) contract for the Environment Agency. The project's aim was to improve and then maintain existing sea defences primarily by replacing eroded shingle and managing its natural west to east drift. The key service provided is protection against breach for up to 1:400 year storms.

PCDL quickly recognised that the best way to maintain the beach, reduce risk of further erosion, and protect neighbouring properties was to set out a sustainable strategy for construction and maintenance of the embankment. Sustaining the beach in order to protect local communities and their environment fully embraces the concept of sustainable development. However, the methods by which the defences are maintained could become unsustainable in time if resources and community issues are not managed appropriately.

Sustainable development is defined in the 1987 Bruntland Report as 'development that meets the needs of the present without compromising the ability of future generations to meet their own needs'. This definition requires complex interactions between environmental, social and economic impacts to be considered, as sustainability covers social, community and marketplace issues as well as environment and resource use.

In June 2010 Pevensey Bay PPP completed its 10th year of operation. The project's first decade saw innovative techniques applied to management of the defences and helped develop evolution of best practice. Lessons learnt and are now being used to good advantage on site.

Over the next 14 years, we recognise the need to continue to respond to wider sustainability challenges and opportunities that we face. To do so, requires a fully integrated approach to managing social, environmental, community, ethical and broader economic factors. Therefore, this plan outlines a series of sustainability targets and actions under the key aspects of:

- Economic viability
- Working with communities
- Environmental limits

The purpose of this action plan is to confirm our commitment to sustainability and in its preparation the plan has been reviewed and aligned to the economic, social and environmental commitments of our shareholders and our client, the Environment Agency.



Section 3 – Sustainability Action Plan

2 Status

This action plan will be reviewed initially every 6 months from first issue by the Project Manager and subsequently updated to reflect progress made and changes within company activities. Any comments on this action plan are welcomed and should be sent to pcdl@pevensey-bay.co.uk.

It will be reviewed annually by a Sustainability Committee, formed by a representative from each shareholding company, the Project Manager, and chaired by the Project Director. Overall ownership of the plan is with the Project Manager.

2.1 October 2011

In July an initial draft of the plan was sent to 15 stakeholder organisations, most of whom have been involved with the project for over a decade. It set out a path we expected to take in order to improve sustainability in our day to day activities.

All but four organisations replied, although some felt they had had insufficient involvement to be able to respond fully. None were critical of PCDL's performance to date, several were complimentary. Westham Parish Council informed us that they no longer have a coastal interest because boundary changes that came into effect on 1st April 2011 passed responsibility to the Pevensey Council.

Suggestions that were made can be summarised as follows;

- Habitat & environmental enhancement. Whilst already a target, it was suggested that this could be expanded to acknowledge the defences as a whole in that they form an overall "beachscape" that has conservation and heritage value.

Objective 3 has been revised to this effect, as has 3.6

- ESCC Ecologist offered assistance in meeting targets 3.6(b) & (d) in developing ecological educational materials to be made available through the website.

PCDL will consult with ESCC to ensure the most suitable information and advice is used in providing the required resources

- Recognise the potential impact of large-scale pollution incidents and liaise with emergency responders to minimise any impacts on local communities.

The Sussex coast has seen several instances during the last decade where ships have lost cargoes that have subsequently been washed up on the beach. No major incidents have occurred in Pevensey Bay

Section 3 – Sustainability Action Plan

3 Sustainability Action Plan

Ref	Area/Target	Actions	By When	By Who	Comments	Status	Completion
Objective – To implement a Sustainability Action Plan							
0.1	Baseline – identify a baseline position from which sustainability improvements can be made	a. Agree baseline position	Aug-10	Ian Thomas, Nicola Williams	Strategic gap analysis undertaken	Baseline complete	11/08/2010
		b. Progress update on baseline and board agreement to be gained for the development of an action plan	Dec-10	Ian Thomas	Baseline discussed and agreed	Action plan to be developed	1/12/2010
0.2	Policy – PCDL sustainability policy	a. Develop a PCDL sustainability policy to be agreed by the Board	Jun-11	Sustainability Committee		Complete	8/06/2011
0.3	Action plan – agree a Sustainability Action Plan (SAP) to the year 2012	a. Responsibility for plan delivery determined	Dec-10	Board	Ian Thomas	Complete	1/12/2010
		b. Completion dates for delivery of actions are to be finalised	Apr-11	Sustainability Committee	As per this document	Complete	10/03/2011
		c. Establish KPIs (Key Performance Indicators) to ensure completion of this SAP	Apr-11	Sustainability Committee	March workshop held and KPI's were discussed	Baseline KPIs vary from June 2000, onward depending on data set	10/03/2011
0.4	Communication – internally communicate aspects of sustainability that apply to PCDL and obtain feedback	a. Include sustainability as an agenda item at quarterly Board Meetings	Operating	Ian Thomas	Included from December 2010	Complete	1/12/2010
		b. Record comments on sustainability and	Operating	Ian Thomas		All recorded in monthly reports	On-going

Section 3 – Sustainability Action Plan

Ref	Area/Target	Actions	By When	By Who	Comments	Status	Completion
		feedback from site staff discussions					
		c. Communicate plan to operatives via induction/toolbox talks	Operating	Ian Thomas		Include in site Inductions	On-going
		d. Communicate first draft of the plan to Consortia members and receive feedback	Dec-10	Ian Thomas	Discussed at Board meeting	Complete	1/12/2010
		e. Issue final plan to Consortia members	Jun-11	Ian Thomas	Presented at Board meeting	Complete	8/06/2011
0.5	Communication – externally communicate aspects of sustainability that apply to PCDL obtain feedback and agree sustainability deliverables of Pevensey Bay	a. Sustainability included as an agenda item with the Agency	Dec-10	Ian Thomas	Included at monthly PMs Meeting	Complete	30/11/2010
		b. Seek feedback on the finalised plan from the Agency	Jul-11	Ian Thomas	Draft Issued to Agency for comment	Agency approved for issue to Stakeholders	29/07/2011
		c. Set up a sustainability section on the website and include an online feedback/comment box	Jul-11	Ian Thomas	Page added November 2011	Complete	30/11/2011
0.6	Monitoring – ensure progress against the SAP	a. 6 monthly review & update of the SAP. Report progress on plan & KPIs to the Board	From Sep-11	Ian Thomas		All to be recorded in Board minutes	On-going

Section 3 – Sustainability Action Plan

Ref	Area/Target	Actions	By When	By Who	Comments	Status	Completion
Objective – To work with the Environment Agency to ensure sustainable maintenance for Pevensey Bay and to create a marketplace where equally sustainable coastline management becomes the preferred option elsewhere							
3.2 Economic Viability	1.1 Meeting customer & stakeholder sustainability goals - formally confirm sustainability objectives for maintaining Pevensey Bay's Sea Defences	a. Identify Agency sustainability targets and contribute to these where possible	Nov-10	Ian Thomas	Agency targets identified as; - energy and water consumption - management of waste - carbon footprint; mileage, recycled rather than virgin materials - timber accreditation policy - commitment under ISO14001 and EMAS to prevent pollution		30/11/10
		b. Determine Key Stakeholders to beach maintenance operations	Apr-11	Ian Thomas	Shareholders, Environment Agency, Local Authorities Natural England, Parish Councils, RSPB, Resident Associations		30/04/11
		c. Develop questionnaire to gauge Client & Stakeholder views on project sustainability performance	Jun-11	Ian Thomas	Questionnaire agreed at June-11 Board meeting. Client comments received	Complete	29/06/11
		d. Write to Key Stakeholders with questionnaire, review & issue results	Sep-11	Ian Thomas	Issued to stakeholders after Agency comments	Issued 29/07/11 Results reviewed and comments incorporated in revised plan 31/10/11	31/10/11

Section 3 – Sustainability Action Plan

Ref	Area/Target	Actions	By When	By Who	Comments	Status	Completion
1.2	Influencing the wider coastal industry – Gain recognition for providing sustainable coastline management	a. Support Agency & LAs strategy for unifying coastal management	Operating	Ian Thomas & Zoe Hutchison		Any progress noted in PM meeting minutes	On-going
		b. Showcase ‘best practice’ via presentations to coastal professionals and practitioners	Operating	Ian Thomas & Zoe Hutchison	Since 2000	Presentations recorded in monthly reports	On-going
1.3	Evolving ‘best practice’ – measure and report on sustainability performance and where possible exceed expectations	a. Review KPIs progress & survey results from 1.1d to identify further contract efficiencies to be implemented	Jan-12	Ian Thomas	Monitor & review KPIs as necessary	Stakeholder comments reviewed and addressed	31/10/11
		b. Contribute to and participate in research projects	Operating	Ian Thomas		All recorded in monthly reports	On-going
		c. Enter sustainability award competitions where appropriate	Operating	Sustainability Committee	e.g. Mouchel Mportal – details of award scheme	All recorded in monthly reports	On-going

Section 3 – Sustainability Action Plan

Ref	Area/Target	Actions	By When	By Who	Comments	Status	Completion	
Objective: To partner with the supply chain to deliver sustainable solutions and to make a strong contribution to local community well-being; ensuring flood risk and coastal erosion are effectively managed								
3.3 Working with Communities	2.1	Health & Safety – to keep people safe	a. Ensure all operatives work in accordance with Health & Safety plan. Aim to eliminate incidents	Operating	Ian Thomas	Induction sheets records	Any incidents recorded in monthly reports	On-going
			b. Monitor Health & Safety KPIs monthly and report to Agency and Board	Operating	Ian Thomas	Has been agenda item since Dec-08	Recorded in monthly reports	On-going
	2.2	Innovation – collect, respond to and recognise new ideas for improving sustainability in the maintenance of Pevensey Bay’s Sea Defences	a. Identify and review feasibility of suggested innovations from Stakeholders, operatives & PCDL	Operating	Ian Thomas & Zoe Hutchinson	Since 2003	All recorded in monthly reports	On-going
			b. Establish innovations log to keep track of outcome / impacts from any trials	Operating	Ian Thomas		All recorded in monthly reports	On-going
			c. Develop case studies from successful trials to help showcase best practice	Operating	Ian Thomas		All recorded in monthly reports. Included in 2010 update of BMM	On-going
			d. Share experiences between shareholders and suppliers	Operating	PCDL Chairman	Has been agenda item since Jun-09	Recorded in Board meeting minutes	On-going
	2.3	Supplier engagement– partner with the supply chain to deliver sustainable solutions	a. Work with suppliers to understand and manage sustainability risks and opportunities	Operating	Ian Thomas	Key suppliers are shareholders	Included on Board agenda since Dec-10	On-going

Section 3 – Sustainability Action Plan

Ref	Area/Target	Actions	By When	By Who	Comments	Status	Completion
2.4	Behaving responsibly – improve the quality of life for communities and individuals and provide a learning environment on coastal management	b. Support local communities by helping in community led projects	Operating	Ian Thomas & Mackley	Considerate Constructors Scheme since 2004		On-going
		c. Record instances of support provided to the community	Dec-11 Dec-12	Ian Thomas	Records started in Jan 2011	Included in monthly report	On-going
		d. Keep a log of charitable contributions	Dec-11 Dec-12	Ian Thomas	Records started in Jan 2011	Included in monthly report	On-going
		e. Support research of better understanding of coastal processes	Operating	Ian Thomas		Included in monthly report	On-going
2.5	Employing locally – to support the local economy	a. Look to procure materials locally	Operating	Mackley			On-going
		b. Try to use local suppliers & tradesmen	Operating	Ian Thomas Mackley	Policy since 2000		On-going
2.6	Community Engagement – actively involve the community on the sustainability aspects of the project	a. Make development plans available to the local community and seek comments prior to finalising works	Operating	Ian Thomas	Stakeholder consultation since 2000.	Included in monthly report	On-going
		b. Hold annual open day allowing residents to learn about beach management	Operating	Ian Thomas	Annual forum since 2001	Included in monthly report	On-going
		c. Introduce 'Open Door' policy at site office to encourage resident participation	Operating	Ian Thomas	"Open Door" policy since 2001		On-going

Section 3 – Sustainability Action Plan

Ref	Area/Target	Actions	By When	By Who	Comments	Status	Completion
Objective: To operate within environmental limits by minimising impact of energy, water and material consumption whilst adapting to the impacts of climate change. Avoid damage to, and enhance where possible, heritage assets and landscape character through promotion of local ecology							
3.4 Environmental Limits	3.1 Climate change and energy – minimise greenhouse gas emissions	a. Record annual business mileage and associated carbon dioxide emissions from transport activities and identify ways to reduce	Dec-11 Dec-12	Ian Thomas		Mileage recorded since Oct 2001	On-going
		b. Switch off electrical equipment and lights when not in use	Operating	Ian Thomas			On-going
		c. Determine carbon footprint of PCDL operations and review opportunities to improve and seek efficiency gains	Jan-12	Andrew Sherlock	Reviewing current use of plant, vehicles and equipment	Intend to use the Agency's carbon footprint calculator	
		d. Purchase A+ or A rated electrical equipment and more efficient plant / vehicles as required	Operating	Ian Thomas			On-going
	3.2 Waste and resources – reduce any waste we generate and manage waste as a resource	a. Identify other forms of waste that could be recycled from office waste stream and ensure waste from maintenance activities is minimised and recycled where possible	Sept-11	Ian Thomas, Mackley & Westminster Dredging	Recycling receptacles provided in Agency depot & office		On-going

Section 3 – Sustainability Action Plan

Ref	Area/Target	Actions	By When	By Who	Comments	Status	Completion	
3.3	Minimising waste over the life cycle of assets - to minimise waste over the project life cycle	a. Continue to monitor shingle movement and look at methods to improve the residual life of groyne structures	Operating	Ian Thomas	Shingle & groynes visually monitored monthly		On-going	
3.4	Reducing direct water use – to minimise use of potable water	a. Maintain rainwater collection tanks and use of irrigation	Operating	Ian Thomas	Rainwater harvested for indoor/outdoor plant watering		On-going	
3.5	Managing the materials life cycle – source responsibly and select materials for lower environmental impacts	a. Undertake environmental risk assessment to identify high environmental impact materials	Mar-12	Andrew Sherlock, Mackley & Westminster Dredging	Materials to consider; Fuel & oil Shingle Timber Aggregates Metals	Assessment yet to be completed		
		b. Implement controls to reduce the quantity of high environmental impact materials	Jul-12	Ian Thomas, Mackley, Westminster Dredging		Awaiting results of 3.5a		
		c. Purchase local sustainable materials and use recycled instead of virgin materials if possible	Operating	Ian Thomas				On-going
		d. Develop a procurement policy to only use sustainable timber and aggregates	Operating	Mackley, Westminster Dredging	Mackley – FSC/PEFC Chain of custody of certificate sought on use of virgin timbers	Only certificated timber since 2000 Shingle only from licensed sources		On-going

Section 3 – Sustainability Action Plan

Ref	Area/Target	Actions	By When	By Who	Comments	Status	Completion
		e. Set as mandatory a requirement to use paper & ink from sustainable/recycled sources	Apr-11	Ian Thomas	Display materials self-printed using recycled paper and print cartridges	Recycled products purchased from paper and ink suppliers	On-going
3.6	Working with protected species and habitats – to protect and enhance heritage assets, landscape character and all ecological resources in Pevensey Bay	a. Support monitoring of vegetated shingle and other local ecological interests with the aim to protect and enhance	Operating	Ian Thomas	East Sussex County Council undertake regular surveys	Monthly photographic record of beach condition undertaken since January 2002	On-going
		b. Develop ecological educational materials to be provided to educational groups	Dec-11	Ian Thomas			
		c. Look to involve the community to provide feedback on any changes noted to the vegetated shingle	Operating	Ian Thomas			On-going
		d. Update website with ecological information showing Pevensey Bay by season	Jun-12	Ian Thomas			
		e. Liaise with emergency planners to reduce impact of third party pollution events	Operating	Ian Thomas	Continue to attend annual PeNG meetings exercises	On-going since 2000	On-going

Section 3 – Sustainability Action Plan

4 Sustainability Key Performance Indicators (KPIs) Measured Annually

	Item	Target	Economic	Community	Environment
1	Number of penalty points received	0	✓		
2	Number of innovations trialled	1	✓	✓	✓
3	Number of external awards	1		✓	✓
4	Number of stakeholders responding to questionnaire	4		✓	✓
5	Accident Frequency Rate	0		✓	
6	Number of complaints / compliments received	4 / 8		✓	✓
6a	Number of unresolved complaints	0		✓	✓
7	Number of case studies produced or presentations made	3	✓	✓	✓
8	Instances of support to charities, local community & research organisations	4		✓	✓
9	Tonnes of CO ₂ from Scope 1 & 2 emissions / expenditure	???	✓		✓
10	Tonnes of waste disposed to landfill	<1	✓		✓
11	m ³ of water used	???	✓		✓

Notes referring to KPIs listed above

1. The contract specifies penalties to be applied if the required service is not provided. They primarily relate to maintaining minimum volumes of beach across 53 defined sections and prompt action in the event of erosion following a weather event
8. This will only record occasions when support has been provided and does not attempt to value them financially
9. Awaiting details of emission calculations to identify a suitable target
10. Need to identify a suitable target for the office used by PCDL (40' portakabin)