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Health, Safety & Environment ENVIRONMENT MANAGEMENT PLAN

Mulberry Place (Phase 3)
Ashford Road / Cockreed Lane
New Romney
Kent TN28

Revisions

Revision No.	Date	Prepared by	Position	Comments
1	19/10/2020	Kay Martin	HS&E Manager	

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Introduction

Pentland Homes are committed to the protection of the environment through the implementation of this Environmental Management Plan which includes measures for dealing with ecological issues, prevention of pollution, protection of water courses, along with a waste management and recycling programme and monitoring of CO₂ emissions from journeys to site and utility use. This programme will meet or exceed all legislative and regulatory requirements placed upon the company.

Monitoring and reporting of cost savings and recycling quantities are vital to the success of the programme and to enable the company to chart progress and this will be carried out on a regular basis.

Responsibilities

All Directors, Managers, Employees, Contractors and Site Operatives have a personal responsibility for the way their conduct impacts on this plan and should ensure that any environmental issues are with dealt with in accordance with this plan and that all guidelines are strictly adhered to.

The Health, Safety & Environment Manager is responsible for the development, initial implementation and subsequent monitoring of the application of this plan and will organise training for employees as required.

Contracts Managers and Site Managers are all responsible for the operation of this policy in areas under their control.

Project CO₂

Pentland Homes will monitor the CO₂ emissions for the site by recording journeys to the development by management, workers, visitors and deliveries. Sharing of vehicles is encouraged and local suppliers / contractors will be used where practicable.

Utility use will also be recorded and data converted to CO₂ for comparison with set targets and industry standards. Methods to reduce energy consumption will be reviewed during site set up but will incorporate encouraging use of battery powered equipment and ensuring site accommodation has PIR lighting, timers on heaters etc.

Archaeology

Pentland Homes have made provision for appointed Archaeologists to carry out investigation works before construction work commences on site. Details of methodology along with method statement etc. and areas to be examined have been provided by Archaeologists and this work is currently ongoing.

Construction Materials

The Commercial Department will ensure that as far as reasonably practicable sustainable and/or renewable products are sourced for this project and where sub-contractors are contracted to the project on a supply and fit basis they will be required to provide materials to the same standards.

Pollution

All reasonable precautions will be taken to prevent pollution of the site, the works and general environment including streams and waterways. All persons working on site will be given environmental awareness training on induction and information on emergency procedures in case of accidental spillage or leaks.

The Emergency Response Plan should be referred to when dealing with any accidental spills or other pollution. This document contains details of the location of suitable spill kits to deal with oil and/or chemical leaks, responsibilities of site personnel, and arrangements for disposal of contaminated materials. The appropriate authorities and the client will be informed of any incidents, without delay, and all relevant information provided.

Fuel

All diesel storage tanks will be adequately bunded to prevent pollution in the event of leak or spillage. Hazardous substances (fuels and chemicals) will be stored securely in accordance with COSHH assessments and will be located on impervious material away from drains and watercourses. Designated refuelling areas will be set up away from drains and watercourses.

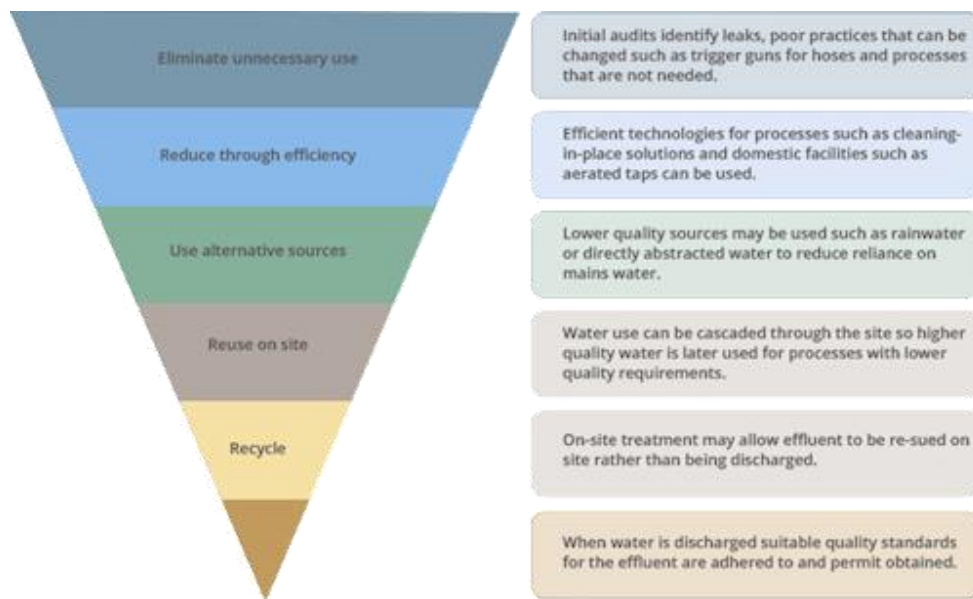
Hazardous Substances

Pentland Homes will ensure that 'environmentally friendly' products including non-toxic paints, solvents and other hazardous materials are used wherever possible and COSHH assessments will be available for all hazardous substances used or produced. Pentland Home will segregate, tightly cover and monitor toxic substances to prevent spills and possible site contamination and will ensure that emergency control measures in case of accidental spillage or release are available in the form of spills kits. Procedures will be communicated to operatives on induction.

Water use

Abstraction of water from piped mains, using a standpipe, will be consented from the relevant local water company.

Water use will be recorded for comparison with targets and industry standards. Pentland Homes will ensure that as little water as possible is wasted by following the water hierarchy and by providing instruction and training to all workers on site.



Waste Water

The following measures will be implemented on this development to prevent accidental pollution to surface and groundwater:-

- Any existing site drainage will be identified and marked on a plan, distinguishing between surface and foul water systems.
- Permanent drainage systems will be installed as early as possible to avoid temporary discharges to surface water.
- All drains will be covered / protected to prevent accidental ingress from mud and silt.
- All stockpiled materials will be stored away from drainage systems and watercourses and protected using geotextile silt fencing or cut-off ditches where appropriate.
- Before any discharges are made to surface water systems wastewater generated from site activities will be collected in settlement tanks and screened. Any remaining sludge will be disposed of in accordance with current environmental regulations.
- Water from vehicle and boot washing facilities will be removed to foul water drainage system.
- Concrete and cement washout will not be allowed to enter the surface water system and cleaning will be carried out in designated areas.
- Site and public roads will be regularly swept to reduce the amount of silt and mud entering surface water drainage system.
- Building materials like cement, sand and other powders will be covered and regularly inspected for spillages. They will also be located where they will not be washed into waterways or drainage areas.
- Welfare facilities will be connected to foul sewer system with consent of maintaining authority.

Emissions to air - Dust / Emissions

Pentland Homes will implement measures to control dust and emissions during construction in accordance with guidance issued by IAQM 'Guidance on the assessment of dust from demolition and construction' and 'The Control of Dust and Emissions during Construction and Demolition' issued by Mayor of London.

Where possible, site cutting of materials will be eliminated to reduce production of dusts and inhalation of fumes which cause cancers, asthma, bronchitis, fibrosis, burns and poisoning and can lead to nuisance levels of dust at adjacent residential properties. Sub-contractors are required to provide COSHH assessments, specific to their work activity, with control measures which should include any relevant measures detailed below. Assessments must also include details of PPE required. Operatives required to use RPE will be required to show proof of Face Fit Testing.

The following control measures are to be implemented to deal with dust on site or which may affect adjacent properties:-

- Pentland Homes will contact local residents early in the life of the project to give them the opportunity to raise any issues prior to work commencing. This will include liaison with local school and Romney Marsh Day Centre to address any concerns.
- Contact details for Pentland Homes will be prominently displayed on site for local residents to report any concerns.
- Pentland Homes will actively monitor the site to ensure the control of dust and emissions. Extra monitoring will take place in dry & windy conditions which increase the likelihood of dust and emissions being produced and dispersed.
- Machinery and dust generating activities will be located away from receptors, whenever possible
- A physical distance and/or barrier will be created between dust / emission generating activities and receptors
- Solid screens or barriers will be placed around dust generating activities. These will be at least as high as any stockpiles on site.
- Earthworks and exposed areas should be re-vegetated as soon as possible.
- Stockpiles will be covered or seeded to prevent wind whipping
- Loose materials will be removed as soon as possible.
- Consideration will be given to installation of green walls, screens and other vegetation to minimise the impact of dust and pollution.
- Measures to keep the site in good order will be implemented, such as bunding construction area to prevent run-off.
- Any hoardings, fencing, barriers and scaffolding will be regularly cleaned, using wet methods (recycled or non-potable water) where possible to prevent re-suspension of particulate matter.
- Boot cleaners will be provided and operatives and visitors encouraged to change shoes and clothing before going off site to reduce the transport of dust.
- An adequate water supply will be available on site for effective dust mitigation (using recycled water where possible)
- Cutting, grinding and sawing should be conducted off-site whenever possible, but if it must take place on site then a water efficient spray pump should be used to reduce amount of dust generated.
- Scabbling should be avoided if at all possible but if cannot be eliminated work areas should be screened off and work surfaces pre-washed.
- Skips should be covered to ensure that dust does not escape.
- Cement, sand, fine aggregates and other fine powders should be sealed after use and stored in enclosed containers or silo. Some materials should be kept damp to reduce risk of drying out.
- Wherever possible haul routes should have a hard surface or paving, which must be inspected regularly and repaired as required. Speed limit of 10mph to be imposed.
- Haul routes and local roads will be kept free from dust, as far as possible, and swept regularly. Where possible this will be water assisted, but care will be taken not to contaminate sewers or local watercourses. Dry sweeping of large areas should be avoided.
- Vehicle wheels will be washed or cleaned before leaving the site using a pressure washer located close to site exit gate, ensuring adequate area of hard surfaced road between wheel wash facility and site exit.
- All vehicles carrying dusty materials must be securely covered before leaving the site.

Vehicle / Plant emissions can significantly add to levels of air pollution so Pentland Homes will employ best practice to reduce these by:-

- Reducing vehicle idling – if a vehicle is stationary for more than a minute then engine should be turned off.
- Deliveries will be managed at times to cut congestion on local roads and to reduce impact on other local road users. Deliveries are restricted to between hours of 9.30am to 2.30pm and after 3.30pm as far as possible to avoid school drop off and collection times.
- Contractors are encouraged to share vehicles to travel to site and Pentland Homes encourages the use of sustainable transport modes, by providing cycle storage and details of bus routes.
- Wherever possible renewable, mains or battery powered generators or other plant should be used.

Bonfires

No fires are permitted on Pentland Homes' construction sites.

Noise & Vibration

Nuisance levels of noise which may affect adjacent properties will be controlled as detailed below and compliance with local authority Environmental Health Policy is mandatory.

Before work commences on site Pentland Homes will provide local residents with contact details and information on the project. Contact information will also be displayed in prominent location on the site. This will provide an opportunity for local residents to address any concerns. Any complaints or concerns will be referred to Health, Safety & Environment Manager and Build Director for response.

The close proximity to the school and Romney Marsh Day Centre is a concern with regard to nuisance noise etc. so contact will be made early in the project to address any potential issues.

Contractors are required to supply equipment which has been designed to reduce noise levels as far as reasonably practicable and may be asked to provide noise assessments for such equipment. Noise-reducing devices, such as silencers and baffles, must be fitted to all machinery.

All vehicles and machinery must be serviced regularly as well-maintained equipment will make less noise and is also less likely to break down. Exhaust systems must be replaced as soon as they become noisy.

All plant operators will be instructed to minimize the use of vehicle reversing alarms. As soon as practicable and where possible, a one-way driving system will be implemented on site. Contractors who supply plant, as part of their contract, will be asked to provide equipment with broadband reversing alarms and Pentland Homes will request this type of alarm when hiring-in plant. However, this will be subject to availability of plant with this technology.

Plant & Vehicle Drivers will also be reminded during induction training to reduce the noise from their vehicles by:

- turning off engines when they are not in use
- checking the brakes are properly adjusted and don't squeal
- not revving the engine unnecessarily
- only using the horn in emergencies

Pneumatic breakers, drilling, piling and any other work that creates high levels of noise will be scheduled to give residents some breaks and working hour will be limited. Residents will be notified about any particularly noisy work

Wherever possible, mains generated electricity will be provided for contractors to reduce the use of diesel generators. Permanently running generators on sites that are close to local housing can cause a nuisance to residents. If generators have to be used, then they must be serviced as detailed above and if practicable located in a three sided enclosure to act as a baffle.

Nuisance noise will also be controlled by restricting working hours and delivery times

Waste Management

The Waste Management Policy is based on the principals of the waste hierarchy:

- Through procurement procedures careful assessment of the amounts and specification of materials required will **eliminate** and **reduce** the amount of waste created for disposal.
- Before discarding any item, it will be assessed to establish if it can be **reused**.
- Wherever possible waste will be **recycled**; either on site or by being sent to a suitable facility for this purpose. To further support this activity, where practical, products made from or including recycled material will be purchased.
- As a last resort waste will be **disposed** of in a responsible way to minimise the risks of future pollution or harm to human health.

This Waste Management Policy forms part of Pentland Homes operational strategy designed to achieve its vision to be a leading sustainable housing developer.

• Procedures

The Site Waste Management Plan for this construction site includes details on who is responsible for waste management, the types of waste that will be generated, how the waste will be managed and measured and which contractors will be used to ensure waste is correctly recycled or disposed of responsibly and legally.

The production of waste at this site will be reduced wherever possible through the education and instruction to employees, contractors and suppliers and by the control available to the company management over all work activities. Good housekeeping standards must be maintained, ensuring that waste and rubbish are controlled to sustain a safe and tidy site.

Commercial and Build departments are instructed to specify that materials are supplied with the minimum packaging and that where not included in the tender, packaging supplied by a sub-contractor be removed by that contractor and disposed of accordingly at the contractors own cost.

Employees responsible for technical specification and buying have been instructed to ensure that appropriate specifications and quantities of materials are used, ordered and supplied to site to ensure minimum waste generation, particularly timber, whilst providing continuity of supply of materials. It is also written into enquiries that where possible all products (especially timber) should be supplied cut to size to reduce on site wastage.

Site management are encouraged to monitor and instil into our contractor's best practice in relation to economic use of material especially those 'labour only' sub-contractors who use materials supplied by us. In addition, active monitoring of each site will be carried out to ensure correct use of waste facilities. This will be done in conjunction with the appointed waste management company.

The Build Director and Contracts Manager have the option to levy penalties against repeat offending contractors who do not comply with policy or for incorrect use of facilities.

• Segregation and storage of waste

A system of segregation and storage of the differing categories of waste has been set up on site and strict controls on the management and use of skips for waste materials will be enforced at site level by site management staff.

A designated area and hard standing has been designated for the provision of skips for removal off site by the Waste Management Contractor. The area has been levelled and stoned and is detailed on the site Traffic Management Plan. All skips are clearly signed and tipping skips have been coloured to ensure cross-contamination is discouraged.

Site Managers are encouraged to set up their own systems with contractors, storeman and forklift operators to control the material put into the skips. The site has been equipped with an appropriate number of tipping skips operable by the telehandler. All operatives will be informed of the waste procedures on site during site induction and if necessary, will be reminded by occasional tool box talks. The process will be to dispose of waste / rubbish etc. in the mini-skips or dustbins placed in or just outside of plots under construction. Once full these will be emptied into the large skips by the telehandler driver who assisted by a labourer will also check the contents upon tipping removing any material that would cross-contaminate the load.

The large skips will be removed by the Waste Management Contractor and taken to the recycling / transfer station as appropriate.

Materials will be separated on site into the following categories:

- Timber (not MDF)
- Metal
- General Mixed Waste
- Plaster / Gypsum products
- Spoil
- Topsoil
- Hardcore

- **Spoil / Hardcore**

In respect of uncontaminated hardcore this must be managed and set aside on site to be crushed and /or reused as clean fill material for example under hardstanding and slabs. Removal to a tip must be a last resort and all inert materials should be used on site for making up levels and backfilling if necessary. The amount generated should be kept to a minimum and kept free from timber and plastics. If material cannot be used it should be removed from site at the cheapest rate and not deposited in skips which attract a higher charge.

- **Plasterboard**

Plaster goods should be segregated and stored in segregated skips to enable the material to be collected and recycled.

- **Contaminated and Hazardous Waste**

Any hazardous waste must be disposed of in accordance with company procedures for hazardous materials which are included in COSHH assessments. Items classed as hazardous, include cleaning agents, paints and thinners etc. Sub-contractors are asked to make their own arrangements for disposal, but segregated skips may be provided by Pentland Homes.

The groundwork contractor will be responsible for ensuring that excess volumes of soil required to be disposed of off-site are sent to an 'inert' landfill site in accordance with Waste Acceptance Criteria testing.

- **Metal Waste**

Limited quantities of ferrous and non-ferrous metals will be produced within waste streams from this development. These are to be segregated on site before being transported to metal recycling facilities by waste management company.

- **Electrical goods / furniture**

Electrical equipment must be disposed of in accordance with WEEE regulations. Items must only be disposed of when they no longer work or when someone else cannot make use of it. Check with Office Manager for correct method of disposal.

- **Waste Management Contractor**

The appointed Waste Management Contractor for the development must have proven track record in management of such facilities and access to licensed facilities for disposal and recycling. The Contractor must conform to the company's designated criteria.

They will report back to the business on a monthly basis as a minimum with the details of the following:

- Number of skips for each waste category.
- Equivalent tonnage from each site for waste category.
- Cost per skip / waste category.
- Total cost per site.

They will also provide to the business upon demand a schedule of the quantities of material that have been recycled, and for use material have been put to, for each of the categories noted above. If all has gone to landfill then it must be stated as so.

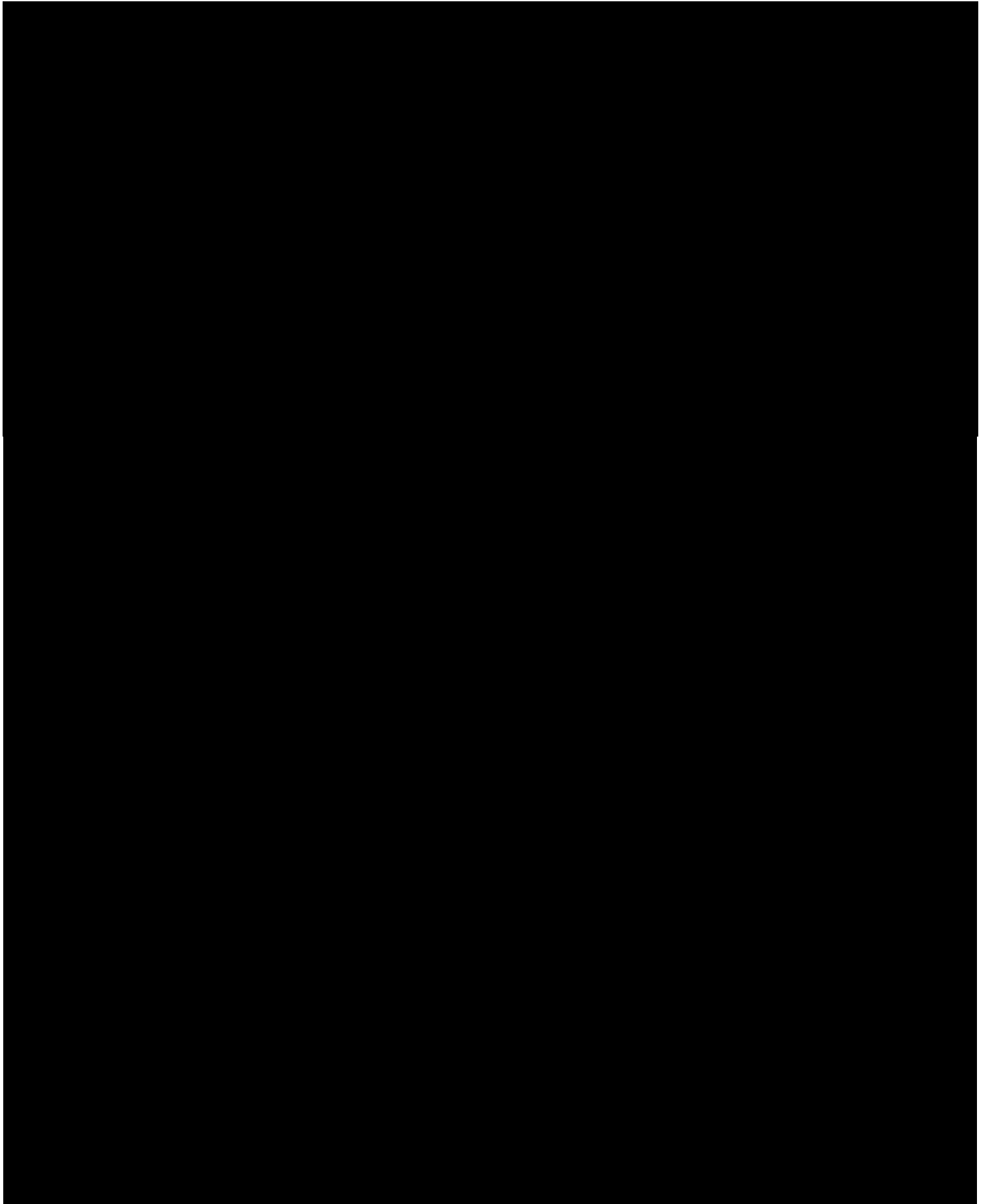
ECOLOGY

Precautionary methods of working have been issued by Native Ecology in September 2020 which are based on ecological information detailed within the following ecological documents:

FPCR (2018). Ecological Appraisal.

FPCR (2018). Great crested newt survey report

FPCR (2018). Badger survey report.



- **GREAT CRESTED NEWTS**

Great crested newts (GCN) and their habitats are fully protected from intentional or reckless harm, injury and destruction under the WCA and The Conservation of Habitats and Species (amendment) (EU exit) Regulations (2019).

GCN have been identified within a nearby off-site pond and have the potential to be present within the boundary habitats within the Site. In order to comply with legislation afforded to GCN, the following actions must be taken:

- All site workers shall be made aware of the potential for GCN to be present within the boundary habitats and shall remain vigilant at all times.
- Only areas of short, grazed grassland shall be impacted.
- If works are required in areas of vegetation over 150mm or in close proximity to boundary habitats, the ecologist shall conduct a habitat assessment prior to works commencing to ascertain whether further mitigation is required.
- In the unlikely event GCNs are identified within the Site, all work must immediately stop within the Site and the ecologist contacted for further advice.

- **REPTILES**

All reptile species are protected from intentional and reckless harm and injury under the WCA.

Grass snakes have been identified as present within the Site. There is also the potential for slow worms and common lizards to be present. In order to comply with legislation and minimise risk of injury to reptiles present within the Site, the following actions must be taken:

- All site workers shall be made aware of the potential for reptiles to be present on Site.
- Any work areas that contain areas of vegetation over 150mm in height shall be subject to a sensitive, phased removal; Vegetation removal shall be completed only in temperatures over 9oC between April-October, when reptiles are active.
- Hand-held tools (brushcutters and chainsaws are acceptable, where required) shall be used to reduce the vegetation height to 150mm.
- Vegetation shall be cut in a north and eastward direction to encourage reptiles to naturally disperse out of the Site.
- After a period of at least 24hours in suitable weather conditions, i.e. dry and over 9oC, the remaining vegetation shall be reduced to ground level.
- Once vegetation has been reduced to ground level, it shall be regularly maintained below 150mm to ensure reptiles do not re-enter any high-risk areas.
- In the unlikely event reptiles are found during works, all work must immediately stop and the reptile(s) carefully moved to a safe, sheltered zone of long vegetation outside of the works area.
- If high numbers of reptiles are found during works, all work must immediately stop and

Details of the above will be included in induction training along with any other measures taken to mitigate for wildlife on this development and procedures to be adopted should protected species be discovered.

- **Trees, Shrubs & Hedgerows**

Tree, shrubs and hedgerows are to be retained, wherever possible, to protect nesting birds and to encourage continued use of the site by bats.

Any removal of woody vegetation will be undertaken outside of the breeding season and must be preceded by an inspection by ornithologist.

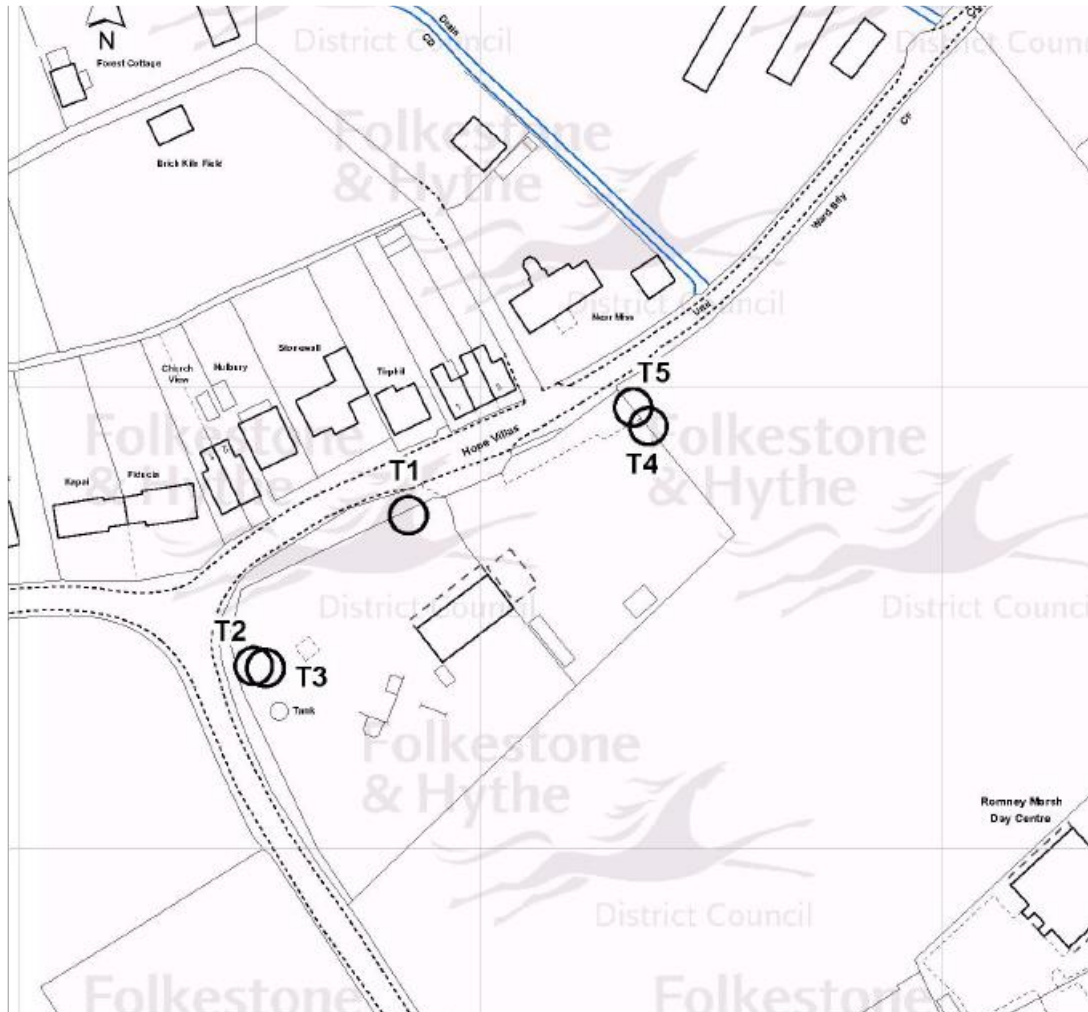
Vegetation clearance must be undertaken in a careful manner with due caution being exercised in case of presence of hedgehogs.

Storage areas for equipment, materials and excavated soils will be located in the less vegetated parts of the site and not permitted in areas of retained vegetation, especially along the site boundaries.

- **Tree Preservation Orders**

Position of TPO trees in the vicinity of the site are indicated on the plan below.

Tree protection fencing is required to off-site trees T4 and T5 and this will be installed prior to start of construction works to protect roots and canopy. This will be in accordance current guidance (BS5837:2012).



- No access will to be permitted inside the tree protection fencing.
- No materials, equipment or debris will be stored within the tree protective fencing
- Notice boards, telephone cables or other services must not be attached to any parts of retained trees.
- Materials which may contaminate the soil (e.g. concrete mixings, diesel oil and vehicle washings) must not be permitted to migrate into the RPA's of retained trees.