

Project

HH0049
New Park House Development

Document

Environmental Management Plan

Rev 2

Approval / Acceptance Status

	Title & Company	Name	Signature	Date
Author:	Senior Engineer VINCI Construction	Jenny Baxter		10/02/20
Reviewed and Approved:				

The master copy of this document is retained on TWWW

Foreword

Before completing this document, all projects must complete the Environmental Assessment and Risk Register (EARR) as per Divisional Environmental Standard (DES1): Environmental Management.

The Senior Site Representative (SSR) is responsible for completing this document on projects, the Regional Director for Regional Offices. The SSR for this project is Graeme Bowen

The VINCI Construction UK, Building Division HSEQ Team can provide guidance and review where required.

Revision History

This document is to be reviewed and updated, together with all other associated documents every 3 months to maintain its effectiveness. Or whenever there is a significant change to the site conditions such as a change in scope of works, site area, methodology, a change in legislation, interested parties, or after an environmental incident etc. Review to include elements such as progress on objectives and targets, training requirements, results on audits, significant communications, and close out of actions.

Record review changes in the table below.

Rev	Date	Revision details and Reason for change	Prepared by	Approved by
0	10/02/21	First issue	Jenny Baxter	
1	10/05/21	Emergency Response Plan added in Section 8	Jenny Baxter	
2	25/01/22	Nuisance section amended	Graeme Bowen	

Distribution of Environmental Management Plan.

Rev	Date	Name	Position

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1. Introduction

1.1 Project Description and Scope

The new Park House development consists of a split level 150 bed mental health facility within North Manchester Hospital. The construction is a one and two storey steel frame, clad with brick and render and a standing seam roof.

Courtyards and roof gardens will provide accessible outdoor space.

1.2 Overview of Environmental Aspects and Impacts Associated with the Project

Much of the Site comprises hardstanding and hospital buildings, with the majority currently unused. Habitats recorded on Site include: buildings and hardstanding, scattered scrub, scattered broad-leaved trees, scattered mixed trees, amenity grassland, introduced shrub and species poor intact hedge

There were no bats or evidence of roosting noted in April 2020. Two stands of Japanese Knotweed are noted in car parks to the south of the site.

An area of contaminated made ground has been found to the north west of the site. Source unknown.

The project is required to meet BREEAM "Excellent".

1.2.1 Environmental report and assessment information

Report / assessment / survey title	Author	Date	Significant aspects	How aspect could impact on the project operationally
Acoustic Planning Report	WSP	October 2020	Noise	Gives background noise levels
Air Quality Assessment	Redmore environmental	13 October 2020	Dust and traffic exhaust	Gives mitigation measures
Site Tree Report and Appraisal	Rowbottom's Tree Services	4 th September 2020	Trees	Tree protection
Phase 2 Ground Investigation	Curtins	1 st December 2020	Ground Contamination	Procedures for dealing with contaminated ground
Preliminary Ecological Appraisal	WSP	May 2020	Biodiversity	Japanese Knotweed & habitat enhancement Bats (re-survey)

2. Project Organisation

2.1 Purpose and Commitments

ISO 14001:2015 S4.3 & S4.4

This Environmental Management Plan (EMP) and the Environmental Assessment & Risk Register (EARR) sets out how the project intends to mitigate and reduce environmental impacts and fulfil all compliance obligations, including contract specific requirements in line with ISO 14001:2015 requirements.

Where project specific procedures, e.g. Client's requirements, planning conditions, ecology reports, etc., are required, these are integrated into the EMP and communicated to those responsible for implementation, management and monitoring.

This EMP will:

- Outline the works to be undertaken by VINCI Construction UK, Building Division and its Subcontractors and how these works affect the environment and the environment the works are in.
- Evaluate and identify the significant environmental aspects and impacts associated with the delivery of the project.
- Outline operational control measures to mitigate the environmental risks associated with the project.
- Determine compliance obligations and how these will be managed.
- Evidence BREEAM credits as required by the assessor

2.2 Environmental Policy

All VINCI Construction UK, Building Division sites display the VINCI Environmental Policy and ISO 14001:2020 certificate on site notice boards and make all site operatives aware of these documents within the site induction. The Policy will be made available to all interested parties.

2.3 Leadership, Commitment and Resources

The SSR, Graeme Bowen ensures the works are carried out in accordance with the EMP, all relevant compliance obligations and that there are appropriate resources for the EMP. The SSR integrates the EMP into all the projects activities and is responsible for the effectiveness of the success, failures and continual improvement. Environmental issues must be an agenda item on management and site meetings.

2.4 Interested Parties

2.4.1 Interested parties

Interested Party	Needs and expectations	How will communication be maintained?	Frequency	Responsible person
Neighbouring residents	To be kept informed	Newsletters	Monthly	SSR
Manchester City Council	Comply with planning requirements.	As required.	As required	SSR

2.5 Project Roles and Responsibilities

The organisation structure and the responsibilities of VINCI Construction UK, Building Division employees are defined in the VINCI Construction UK Environmental Policy.

Roles with specific environmental responsibilities and management are defined within the table 2.6.1.

2.6 Training, Awareness and Competency

The training, awareness and competency levels that are required for all staff whose work may affect the objectives, targets and/or other environmental issues relevant to the project are identified by the SSR, Graeme Bowen in accordance with the VINCI Construction UK Environmental Policy.

All staff, sub-contractor and operatives receive a site induction which provides an overview of the significant environmental aspects and the control measures implemented which they must adhere to.

A significant proportion of the environmental aspects of the business are a direct result of Subcontractor and supplier activities. Subcontractors are assessed prior to works commencing, through pre-qualification on Construction line and iPortal before being registered as a supplier on our COINS system.

Training needs are reviewed regularly by the SSR, Graeme Bowen.

2.6.1 Environmental roles and training

Name	Position	Key environmental roles and responsibilities	Environmental training and awareness obtained
TBC	SSR/Project Manager	- Secures the resources required to maintain the EMP. - Ensure the EMP is established, implemented and maintained. - Monitor the performance of the EMP. - Act as the main point of contact with regulatory authorities and maintain records of telephone conversations and all written communication relating to environmental issues.	
TBC	Construction Manager	Ensures compliance obligations are adhered to and continually improved.	
TBC	Supervisors	Ensures compliance obligations are adhered to and continually improved.	
WSP	Ecologist (appointed consultant)	- Writing the ecology report. - Monitoring and reporting ecology throughout contract	
TBC	Environmental Champion	Raise awareness of the VINCI Environmental Policy, EMP and its requirements and all environmental aspects, targets and compliance obligations to all staff.	
Staff and Subcontractors		- Comply with all VINCI Policy's and Standards. - Comply with all applicable legislative. - Contribute to the success of environmental targets and implementation of the EMP and VINCI Facilities Standards.	

3. Planning

3.1 Aspects & Impacts, Risks and Opportunities and Life Cycle Assessment (LCA)

An Environmental Aspect is:

‘an element of the projects activities, products and services that it can control and/or influence that interacts with the environment’.

An Environmental Impact is:

‘Changes to the environment, either adverse or beneficial, that result wholly or partially from environmental aspects.’

An organisational risk is an:

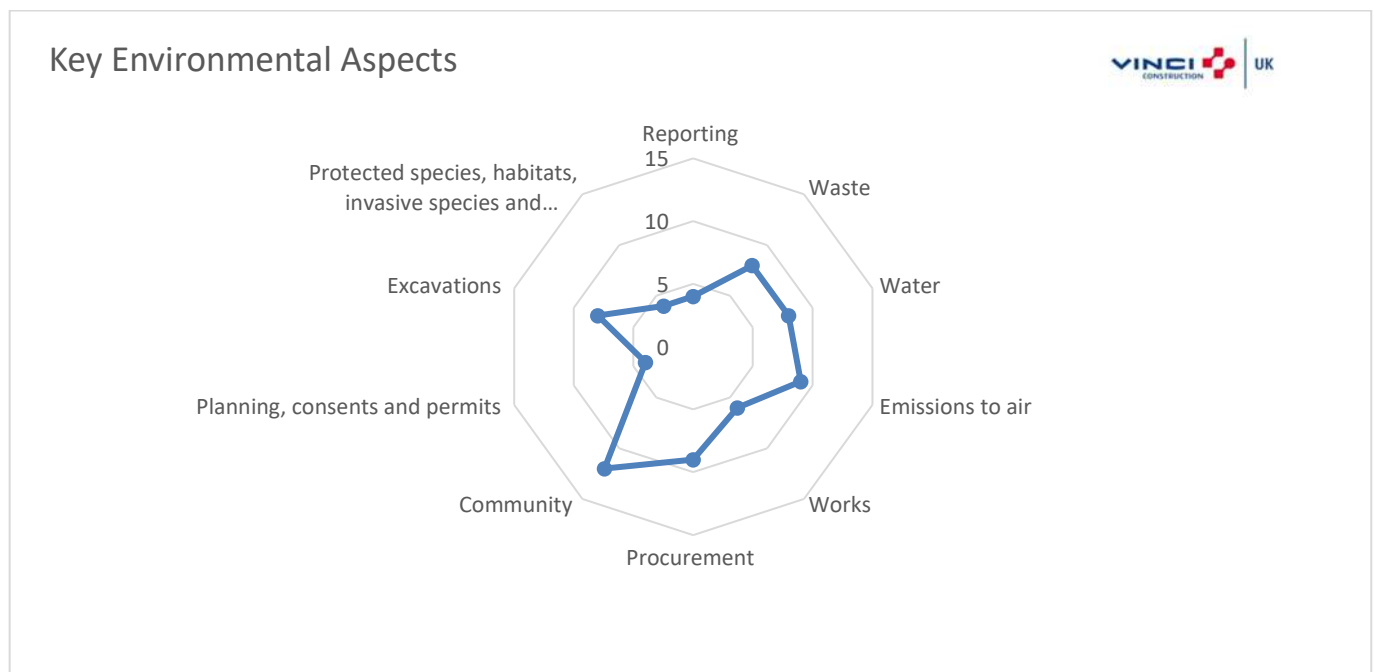
‘actual or potential threat of adverse effects to the organisation (VINCI Construction UK Building Division) arising from our activities.’

Environmental opportunities are:

‘potential beneficial effects the project/contract can provide and means to improve its performance and competitive advantage and reduce organisational risk.’

Risk management on all projects is subject to DES1 Environmental Management. This standard sets out the risk management arrangements for the environment. Every Project will complete The Environmental Assessment & Risk Register to identify and record the specific aspects, impacts, Life Cycle Assessment and compliance obligations.

Projects consider its control and influence over environmental impacts associated with product use and end-of-life treatment or disposal.



3.2 Compliance Obligations

The Legislation Register is held online using Legislation Update Service (LUS). Compliance obligations relates to all relevant environmental legislation that the project must comply with and any other requirements the project subscribes to or is imposed by the Client or contract requirements.

The Head of HSEQ for the Building Division will communicate any relevant changes to legislation to the project, in the form of environmental alerts and guidance.

Key compliance obligations are detailed within the Environmental Assessment & Risk Register.

3.3 Environmental Objectives

Environmental objectives will be agreed at Divisional Level and published as part of VMOST. Each site implements supporting objectives which are detailed in the table below.

The project also complies with Client specific contractual environmental objectives as required, also detailed within the table below. The targets will be measured and reported in line with the BREEAM requirements.

3.3.1 Environmental objectives

Objective	How will this be achieved	Responsible person and position	Target completion date
The amount of non-hazardous construction (excluding demolition and excavation) waste (m ³ /100m ² or tonnes 100m ²) generated on site by the development will be less than 7.5m ³ (or 6.5 tonnes) per 100m ² (GIFA).	The Site Waste Management Plan (REMP) will give details of the measures to be taken to reduce site waste.	Waste Champion	PC + 1 month
The non-hazardous construction waste diversion from landfill will be 80% by volume or 90% by weight.	The waste management contractor will sort and recycle the waste taken from site	Waste Champion	PC + 1 month
The non-hazardous demolition waste diversion from landfill will be 80% by volume or 90% by weight.	The waste management contractor will sort and recycle the waste taken from site	Waste Champion	PC + 1 month
The energy usage will be targeted <29,000kWh per £1m turnover	The Energy Champion will report the energy usage monthly in the site meetings and client meeting reports.	Energy Champion	PC
The water usage will be targeted <100m ³ per £1m turnover	The Energy Champion will report the water usage monthly in the site meetings and client meeting reports.	Energy Champion	PC
The transportation movements will be targeted <75,000km and the kgCO ₂ -eq targeted <200,000kg CO ₂	The Energy Champion will report the monthly in the site meetings and client meeting reports.	Energy Champion	PC
Zero Level 1 or Level 2 incidents	Environmental Champion will monitor and report issues and incidents.	Environmental Champion	PC
100% procurement of renewable energy	Contract with the energy shipper to be for renewable energy sources	Commercial Team	PC

4. Communication

4.1 Internal Communications

Divisional communications consists of email and internet sources, environmental alerts and briefings.

Site specific communications are as detailed below.

- Site inductions will detail the environmental risks and precautions for the site
- Posters will detail issues arising as the works progress
- Environmental alerts will be issued by VINCI head office and will be displayed on site
- Toolbox talks will be given on relevant subjects as required by the stage of the works

4.2 External Communications

Relevant information from the EARR is communicated to Subcontractors to ensure it is captured within their Method Statements.

Newsletters to the local properties will advise of environmental issues being addressed on site.

A Community Contact and Complaints Record is used to record all environmental communications and complaints between interested parties and the public. This log is shared with all relevant persons.

The logbook is located in the site offices and the SSR, Graeme Bowen is responsible for responding to complaints and ensuring the process is followed.

5. Document Control

5.1 Document Control

This Environmental Management Plan will be reviewed and updated every 3 months, together with all other associated documents to maintain its effectiveness. Or, whenever there is a significant change to the site conditions such as a change in scope of works, site area, methodology, a change in legislation, interested parties, or after an environmental incident.

The details of all changes made as a result of each review will be recorded within the Revision History section on page 2 of this document.

Our management system documents are stored electronically in our business management system known as The Way We Work (TWWW).

A copy of this completed EMP should be saved on Viewpoint along with all other Divisional Environmental Management Plans and Documents to allows files to be shared with the project team.

5.2 Records

All the key environmental records required to be held, and the minimum length of time they must be retained for are stated in the table below.

5.2.1 Environmental records

Record	Minimum retention period
Waste Transfer Notes	2 years
Waste Consignment Notes	3 years

6. Operational Control

Site specific activities not covered by the Group or Divisional Standards that may impact on the environment, or are relevant to the management of environmental issues will be controlled by the implementation of site specific procedures. These are to be developed by the SSR, Graeme Bowen with

input from appropriate specialists, interested parties and the VINCI Construction UK, Building Division HSEQ Manager/Advisor.

All operatives and sub-contractors are required to have a site induction prior to starting work, which highlights environmental aspects applicable to the project, the control measures in place and the requirements from all operatives. Confirmation of receiving the induction must be obtained and retained.

Table 3.8.1 Operational control

Document	Management
Waste Management Plan (REMP)	Reviewed and updated as part of this EMP
Surface Water Management Plan	Reviewed and updated as part of this EMP
Sustainable Procurement Plan	Reviewed and updated as part of this EMP
Emergency Response Plan	Reviewed and updated as part of this EMP
Materials Management Plan	External consultant to prepare and maintain the MMP
Invasive Non-Native Species Protocol	External consultant to prepare and maintain the protocol

7. Performance Evaluation

7.1 Monitoring and Measurement & Evaluation of Compliance

During the project the site team determines which aspects need to be measured and will develop a practical monitoring programme.

Monitoring requirements are incorporated into relevant procedures and method statements.

Results of monitoring are regularly reviewed and communicated during project review meetings.

The SSR, Graeme Bowen is responsible for regular site surveillance to evaluate performance against the project specific objectives, legal requirements, environmental commitments and the requirements of the EMP.

7.1.1 Monitoring requirements and how compliance will be evaluated

Monitoring	Frequency	Responsible person(s)	Evaluation of compliance
Site Team Inspection (available on TWWW and Fieldview)	Weekly	SSR	Review as part of audit
Senior Management Audits (Footprint)		Senior Manager	Review as part of audit
Environmental Performance Indicator reporting - Footprint	Monthly	Environment Champion	Review as part of audit
Gas detectors during confined space working	Daily	Supervisors	Review as part of audit
Monitoring of compliance with requirements of waste duty of care	Monthly	Waste Champion	Check licences valid
Waste Monitoring	Monthly	Waste Champion	Track waste figures against targets and report results

Monitoring	Frequency	Responsible person(s)	Evaluation of compliance
Energy Monitoring	Monthly	Energy Champion	Track energy use against targets and report results
Review of Performance at Project Meetings	Monthly	SSR	Review as part of audit
Internal Environmental System Audit	As required	SSR	
External Environmental System Audit		SSR	
Aspects and Impacts Assessment	Quarterly	SSR	Review as part of audit

7.2 Internal Audit Programme

In compliance with the requirements of ISO 14001:2015 the project will be audited, under the combined HSEQ Audit Programme.

A project may be audited more frequently depending on the project's environmental risks, incidents or at project management request.

7.3 Nonconformity & Corrective Action

Corrective Action Report (CAR) will be raised where a system deficiency has been identified during inspections, incident investigations, internal audits, third part audits or customer complaints.

7.4 Continual Improvement

The project will continually improve the suitability, adequacy and effectiveness of the Environmental Management System to enhance environmental performance.

This may include:

- Review of customer feedback reports and development of any specific action plans
- Reviews with our supply chain and their workforce to identify either process or product improvement measures
- Review of audit/inspection/site visit feedback recommendations and findings
- Review of internal reports/meetings, site environmental meeting, monthly project reviews, lessons learnt reviews etc.

8. Emergency Incident Preparedness and Response

An Environmental Incident is an unplanned, undesired event that results or could result, in harm or damage to the environment, or have the potential for enforcement action relating to legislation and/or consent conditions. This plan sets out courses of action appropriate to different types of environmental incident. If you are in any doubt as to what course of action to take, contact HSEQ team or contact the HSEQ Department on 01923 470462.

8.1 Spillage of Fuel, Oil, Chemicals, Sewage Sludge or Water Run Off

Assess the risk that the spillage poses to the health and safety of people on site and in the surrounding vicinity; the environment.

Obtain appropriate PPE in accordance with the material COSHH sheet and the nature of the clean-up works to be undertaken.

Contain the spillage if it is safe to do so using an appropriate spill kit, to prevent it from spreading and / or entering a drainage system or watercourse.

Stop the spill by standing up the drum, turning off the tap etc. As appropriate, decant any remaining liquid into a secure vessel and label; avoid standing in the spill.

If it is not possible to contain and/or stop the spill, call the Emergency Spill Response Contractor (detailed above); quote 'VIN001' and provide details of the incident.

Inform the Senior Site Representative (SSR) and if appropriate the Emergency Services (Local Police, Environment Agency (EA), Sewage Undertaker and/or Water Supplier). The EA must be informed in the event of a spillage entering a surface water drainage system or watercourse. All assistance should be provided to the authorities should they attend site. The HSEQ team must be notified **immediately** of any such incident.

Clean up the spill if it is safe to do so, using the appropriate spill kit. Treat all material in contact with the spill as contaminated.

Decontaminate the site and all personnel that have come into contact with the spill. Dispose of PPE, all contaminated materials and the used spill kits as hazardous waste (ensure Footprint is updated). Replace the spill kit(s) used and all contaminated material.

Report the incident on Footprint. Ensure that the HSEQ team is notified of the incident when submitting the form

8.2 Fire

Raise the alarm.

If it is safe to do, use a suitable fire extinguisher to put out the fire. Always check your exit is clear and allow time to vacate the area.

If fire water or harmful substances have entered a water course, contact the HSEQ team **immediately** as the Environment Agency may need to be contacted.

Report the incident on Footprint.

8.3 Archaeological, Heritage or Wildlife Disturbance

Stop work and inform the SSR if you discover an item of archaeological / heritage interest, or discover / disturb a bird nest, bat roost, badger sett, reptiles or amphibians, or identify an invasive species e.g. Japanese knotweed.

The SSR, Graeme Bowen will consult with the HSEQ team or appointed Ecologist/Archaeologist and establish an Action Plan. Note that the services of qualified external consultants may be required if not already employed.

Implement the Action Plan

Report the incident on Footprint. Ensure that the HSEQ team is notified of the incident when submitting the form.

8.4 Flooding

The SSR, Graeme Bowen will evaluate the risk to health and safety of staff and neighbours, and clear the site as appropriate. If it is safe to do so, the SSR will then:

Consult the site drainage plans to **establish if the flood poses a threat to live sewers**. If it does, the SSR, Graeme Bowen will inform the local Water Company and EA.

The SSR, Graeme Bowen will organise for all **plant and hazardous materials to be securely stored on dry ground**. Non-hazardous materials will be secured to prevent floating away.

Arrange for dewatering of the site. If this involves pumping into a watercourse or sewer this **must be discussed with the EA, Local Authority or Local Water Company** as appropriate. All assistance should be provided to the authorities should they attend site.

Report the incident on Footprint

8.5 Damage to Sewage Pipes

Cease work and inform the SSR; they will establish if damage has occurred. If sewage pipes are damaged, do not mix with surface water drains or watercourses.

The SSR, Graeme Bowen will contact the EA / Sewage Undertaker and follow any advice given. All assistance should be provided to the authorities should they attend site.

Report the incident on Footprint. Ensure that the HSEQ team is notified of the incident when submitting the form.

8.6 Noise/ Vibration/ Dust

If there is a reason to believe that nuisance will arise:

The SSR, Graeme Bowen will ensure that the local Environmental Health Department is contacted and informed of the nature and extent of the works to be undertaken, as well as mitigation proposed.

It is a legal requirement that 'Best Practicable Means' are adopted to ensure that nuisance from works is minimised as far as is reasonably practicable. Where specific contractual or local authority conditions are imposed on any works (e.g. restriction on working hours), subcontractors and their operatives must be advised prior to commencing works on site.

Best Practicable Means (BPM) of noise control will be applied during construction works to minimise noise (including vibration) at neighbouring residential properties and other sensitive receptors arising from construction activities.

Noise

The general principles of noise management are given below:

Control at source:

- Equipment – noise emissions limits for equipment brought to site.
- Equipment – method of directly controlling noise e.g. by retrofitting controls to plant and machinery.
- Equipment - indirect method of controlling noise e.g. acoustic screens.
- Equipment - indirect method of controlling noise e.g. benefits and practicality of using alternative construction methodology to achieve the objective

Control across site by:

- Administrative and legislative control,
- Control of working hours,
- Control of delivery areas and times,
- Physically screening site,
- Noise Monitoring, to check compliance with noise level limits, cessation of works until alternative method is found.
- Many of the activities which generate noise can be mitigated to some degree by careful operation of machinery and use of tools. This may best be addressed by tool box talks and site inductions.

Best Practical Means (BPM)

BPM are defined in Section 72 of the Control of Pollution Act 1974 and Section 79 of the Environmental Protection Act 1990 as those measures which are:

“reasonably practicable having regard among other things to local conditions and circumstances, to the current state of technical knowledge and to financial implications”.

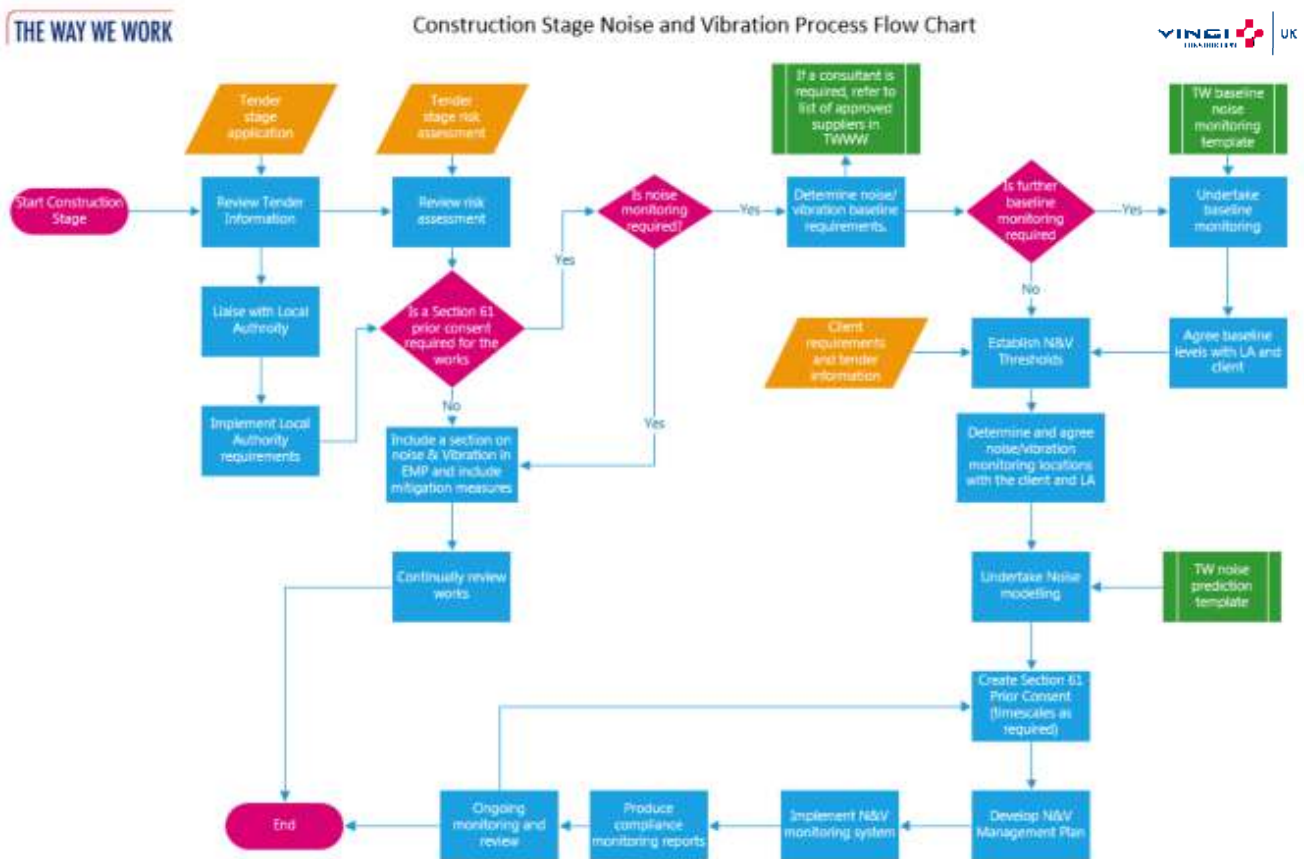
We will consider mitigation in the following order:

- BPM as identified above, including:
 - Noise and vibration control at source: for example the selection of quiet and low vibration equipment, review of construction methodology to consider quieter methods, location of equipment on site, control of working hours, the provision of acoustic enclosures and the use of less intrusive audible warnings such as broadband vehicle reversing alarms;
 - Screening: for example local screening of equipment or perimeter hoarding; and

The recommendations of BS5228: 2009+A1:2014 ‘Code of practice for Noise and Vibration Control on Construction and Open Sites’, will be implemented, together with the specific requirements of this management plan.

The SSR, Graeme Bowen must

- Conduct a risk assessment to determine if a section 61 prior consent required. If the risk is moderate or significant, the site must pursue a Section 61 prior consent with the LA. A section 61 is mandated if the project is working outside normal working hours (Monday to Friday 08:00 to 18:00 and Saturday 08:00 to 13:00) and/or if excessively noisy works/vibration are planned.
- Continually assess the project to evaluate if a Section 61 prior consent is required.
- Ensure applicable records and monitoring reports are kept and produced to a clear and good standard
- RAMS include work specific BPM
- The site will only work within hours approved by the LA
- Each item of plant will comply with the noise limits quoted in the relevant European Commission Directive 200/14/EC/United Kingdom Statutory Instrument (SI) 2001/1701.
- Acoustic barriers or enclosures must be placed around noisy plant/equipment where practicable and safe to do so.
- All plant and machinery delivered to site have the white noise reversing alarms.



Vibration

Under the control of pollution act, IHP are required to manage the vibration generated from construction works and it's impact on sensitive receptors.

The SSR, Graeme Bowen must

- Consider innovative technology and engineering options that can reduce/eliminate vibration levels.
- Check if levels of vibration expected can result in structural damage to buildings
- Ensure BPM measures are incorporated into the proposed project works methodology
- Ensure applicable records and monitoring reports are kept and produced to a clear and good standard
- RAMS include work specific BPM
- Any section 61 requirements are included within the project induction

During the construction of the building foundations, the piling contractor will need to minimise the vibrations as much as possible when piling, especially when piling through obstructions. The number and depth of the piles will be subject to the outcome of the Phase 2 Site Investigation.

BS 5228 (ref.13.7) advises that the level of vibration generated by CFA method of piling is minimal. The standard provides details of measured data and the highest measured ppv is 0.4 mms⁻¹ at 10m, with levels at 20-30m generally below 0.1 mms⁻¹. These levels are significantly below the limit at which cosmetic building damage becomes likely.

Air quality & Traffic

IHP and its contractors will manage dust, air pollution, odour and exhaust emissions during the construction works in accordance with Best Practicable Means (BPM) and refer to current publications on 'best practice' by the Institute of Air Quality Management (IAQM).

The receptors considered most sensitive are those located within 20m of construction works and/or routes used by construction vehicles. The Institute of Air Quality Management (IAQM) methodology for assessment of dust from demolition and construction has been used to classify the risk of dust impacts as 'low', 'medium' and 'high' risk at the locations of relevant sensitive receptors.

Mitigation measures can include:

- Planning the site layout
- Provision of dust suppression measures in all areas of the construction sites that are likely to generate dust. These will be water bowsers during dry periods during earthworks and on hauls roads
- Measures to keep roads, accesses and vehicles clean. This includes a jet wash at the gates, operated by the gateman. Road sweepers will also be utilised to clean surrounding roads.
- Enclosure, shielding or provision of filters on plant likely to generate excessive quantities of dust beyond the site boundaries
- All aggregate delivery vehicles will be sheeted

Ensure neighbours are informed in advance of works likely to cause disturbance.

In the event of complaints being received follow the "Complaints from Third Parties" process below.

8.7 Complaints from Third Parties

If a complaint is received from a member of the public or other 3rd party, whether or not it is justified:

Cease work and inform the SSR who will liaise with the complainant to determine the cause of the complaint and ensure that action is taken to mitigate the problem.

In the course of the investigation, the **SSR, Graeme Bowen** will establish whether the complaint is justified and will take further action as appropriate to prevent further recurrence.

Report the incident on Footprint as an incident if required.

The **SSR, Graeme Bowen** will **update the Communication Log** with the nature / date / time of the complaint, what mitigation measures were taken and whether it has been closed out with the complainant.

8.8 Emergency Response Plan

The Emergency Response Plan can be found on TWWW. This document details the key contacts, reporting requirements, evacuation roles and responsibilities.

This information is predominately displayed across the site and the relevant site staff made aware of the details.

Relevant personal are trained in the effective deployment of pollution control equipment during the site induction and through regular toolbox talks and evidence of training retained.

Spill kits are located alongside fuel storage and refuelling areas, COSHH cabinets or in areas where activities using substances which could cause harm when spilled and enter the environment.

8.9 Incident reporting

The SSR, Graeme Bowen reports environmental incidents, Close Calls and Positive Interventions (CC/PI's) via Footprint and Fieldview in accordance with the relevant Divisional Integrated Management Standard.

An Environmental Incident is defined as:

'an unplanned, undesired event that results in: harm or damage to the environment or the potential for enforcement action relating to environmental legislation, consents and consent conditions'.

Harm or damage to the environment includes (but not limited to):

'pollution of, or damage to, surface water, groundwater, or land; spills or leaks of oil and chemicals; damage to archaeology or heritage (listed and non-listed); damage to wildlife; including protected species and habitats; excessive noise, dust and/or other air pollutants, vibration or light pollution; or failure to control waste or excavated material in accordance with the regulations.

Incidents are classified as Level 1, 2, 3 or 4 (4 = close call)'.

Level 1: An incident which results in catastrophic harm or damage to the environment, with a high likelihood of enforcement action and/or significant media attention.

Level 2: An incident resulting in significant harm or damage to the environment with a moderate likelihood of enforcement action and/or media attention. The incident may involve the receipt of a statutory notice from a regulatory body.

Level 3: An incident resulting in limited or no damage to the environment with a low potential of enforcement action.

Level 4 (Close Call): An environmental near miss with low potential of harm or damage to the environment that could result in enforcement action.

8.10 Investigating environmental incidents

In the case of a Level 1 or Level 2 environmental incident a written investigation report will be produced by the HSEQ team. This will include details of corrective and preventative actions that are to be implemented. Where appropriate a written Root Cause Analysis will be carried out in accordance with the Divisional Integrated Management Standard.

The SSR, Graeme Bowen will be the local point of contact with regulatory authorities and will maintain records of telephone conversations and all written communication relating to environmental issues. The VINCI Construction UK Building Division Head of HSEQ will be the formal point of contact with regulatory authorities and provide support and guidance for the SSR.

References

VB Environmental Assessment & Risk Register EARR VB-ENV-FR-0001-0002
 VB Surface Water Management Plan VB-ENV-PL-0009-0001
 VB Waste Management Plan REMP VB-ENV-PL-0003-0001
 VB Emergency Response Plan VB-IMS-PL-0004-0001
 VB Divisional Integrated Management Standard VB-IMS-ST-XXXX-0004