

ENVIRONMENTAL & SUSTAINABILITY PROCEDURE



SHEQ Management System Procedure

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1 PURPOSE AND SCOPE

This procedure is issued on behalf of United Living and applies to all the activities and services that are included in the scope of the United Living Environmental Management System (EMS).

The procedure details the environmental controls to be implemented to ensure that United Living takes due care and consideration of the environmental impact resulting from its operational activities. The procedure provides instructions to staff and subcontractors for controlling environmental risk and ensuring legal compliance.

2 DEFINITIONS

Term	Definition
Abstraction	The process of taking water from any source including rivers, lakes and streams.
Biodiversity	The variety of plant and animal life in a particular habitat, a high level of which is usually considered to be important and desirable.
Controlled waste	Waste that is subject to legislative control in either handling or disposing of it. These includes domestic, commercial and industrial waste.
Controlled waters	Virtually all fresh water including rivers, streams, lakes, canals, ponds and groundwater.
Discharge	The process of releasing liquid effluent or waste water to surface water or onto the ground.
Environmental impact	Any adverse change to the environment resulting from United Living's activities or services.
Environmental Management System (EMS)	The framework through which United Living monitors, improves and controls its environmental performance to ensure that environmental risk is reduced or eliminated.
Environmental risk	Actual or potential threat of adverse effects on the environment arising from United Living's activities, including emissions, waste and resource depletion.
Hazardous waste	Waste is considered hazardous if it (or the material or substances it contains) are harmful to humans or the environment. Examples include, asbestos, chemicals, batteries, solvents, oils and ozone depleting substances.
Objective	The overall environmental goal, arising from the environmental policy that United Living has set itself.
Receptor(s)	Specific buildings and locations (e.g. hospitals, schools, residential developments) where the occupants are more susceptible to the adverse effects of exposure to noise/vibration.
Source Protection Zone (SPZ)	Zones defined by the Environment Agency for the protection of groundwater sources (e.g. wells) that are used for public drinking water supply.
Target	The performance requirement applicable to United Living that arises from the environmental objectives.
Trade effluent	Any liquid waste that is discharged from premises being used for a business, trade or industry. The only liquid wastes which are not classed as trade effluent are domestic sewage and clean, uncontaminated surface water.

3 RESPONSIBILITIES

The project leaders are responsible for:

- Ensuring legal and all other requirements are fully implemented as part of the Construction Phase Plan, including the development and delivery of an Environmental & Sustainability Plan.
- Agreeing the activities with a high environmental risk and developing a Project Environmental Risk Evaluation & Assessment.

Managers are responsible for:

- Ensuring that environmental control measures are fully implemented and monitored, including compliance with relevant legislation and good practice.
- Verifying that all operatives have been briefed by their supervisor on the environmental risk control measures.
- Ensuring continual assessment of environmental risks through inspections and audits and raising environmental awareness.
- Updating the Project Environmental & Sustainability Plan and all associated and relevant documentation.

Senior Visiting Managers are responsible for:

- Reviewing the management of the environmental risks and recording comments in the Visiting Managers Report.

4 METHOD/IMPLEMENTATION

4.1 Objectives and Targets

4.1.1 Establishing Objectives and Targets

On identifying significant environmental aspects for the business, the Group Board and SHEQ Director with the assistance of the Environmental Advisor shall formulate appropriate environmental / sustainability objectives and targets.

In setting environmental / sustainability objectives and targets the following shall be taken into consideration:

- Sustainability & Environmental Policy
- Significant environmental aspects
- Technological options and best practice
- Financial, operational and business requirements
- Views of interested parties
- Continual improvement

Environmental / sustainability objectives and targets shall also be considered for maintaining as well as improving environmental performance.

The group environmental / sustainability objectives and targets shall be reviewed and approved by the Group Board and SHEQ Director.

4.1.2 Documenting Objectives and Targets

The Group environmental / sustainability objectives and targets will be detailed within the Group Sustainability & Environmental Policy, Group Sustainable Business Strategy and Group Sustainability Action Plan.

4.1.3 Monitoring Objectives and Targets

The Contract/Project Manager shall ensure that monitoring and recording of performance against the requirements of the environmental / sustainability objectives and targets is undertaken.

4.1.4 Reviewing Objectives and Targets

The SHEQ Director and Environmental Advisor shall review the Environmental/sustainability objectives and targets whenever any of the following occurs:

- Changes in the Sustainability & Environmental Policy
- Changes in relevant legislation that impacts on environmental control limits
- Action by an enforcement agency (e.g. Environment Agency)
- Changes in the environmental aspects and impacts
- On receipt of complaints
- When the relevant environmental / sustainability objective has been achieved

Performance of the Group against the environmental / sustainability objectives and targets shall be discussed at Monthly Sustainability Strategy Meetings and the Annual Environmental Management Review.

4.2 Waste Management

4.2.1 Site Waste Reduction Plan

The Contract/Project Manager, with the assistance of the Quantity Surveyor and Design Manager shall define and produce the [FRM-4121 Site Waste reduction Plan](#) prior to the commencement of each project as good practice.

The Contract/Project Manager with the support of the Quantity Surveyor and Design Manager shall identify the following in the [FRM-4121 Site Waste Reduction Plan](#):

- The waste types expected to be generated on the project
- An estimation of the projected volume / tonnage
- The proposed method of disposal including proposals for avoiding and reducing waste.

The Contract/Project Manager shall ensure that the [FRM-4121 Site Waste Reduction Plan](#) includes the following details:

- Waste stream type
- The name of the waste broker/carrier
- The registered carriers licence number and date of expiry
- Waste disposal facility
- Waste management licence number or waste management exemption details
- Details of waste streams the disposal site is licensed to accept.

4.2.2 Waste Exemptions and Permits

The Contract/Project Manager shall ensure that relevant waste exemptions and permits are obtained for all activities where required in accordance with the Environmental Permitting Regulations.

The Contract/Project Manager shall apply for an exemption when a waste operation is exempt from requiring an environmental permit. On sites where an exemption is required the exemption shall be registered with the Environment Agency. There are four types of exemption for operations involving waste:

- Using waste (exemptions U1 to U16)
- Disposing of waste (exemptions D1 to D8)
- Treating waste (T1 to T33)
- Storing waste (S1 to S3)

The Contract/Project Manager shall apply for a permit when the limits and conditions of an exemption cannot be met. On sites where a permit is required the Contract/Project Manager shall register the exemption with the Environment Agency. There are two types of waste permit:

- Standard rules permit – a set of fixed rules for common activities
- Bespoke permit – tailored to business activities

If a new waste permit is required the Contract/Project Manager shall apply for the permit at least 4 months prior to the start of the waste activity.

Additional guidance on waste exemptions and permits can be found in Environmental permitting: Core guidance (2016).

4.2.3 Identification and Storage

The Site Manager shall ensure that the following waste segregation is applied where practicable:

- Inert (rubble, concrete, bricks, blocks, tiles)
- Wood and timber
- Plaster and plasterboard
- Packaging (cardboard and plastics)
- Hazardous waste (fluorescent tubes, waste paint, mastic containers)
- Metal

Non-segregation of waste on site and the use of general mixed-waste containers shall only be permitted when it is not possible to segregate on site due to restricted space, or access to the site. The Site Manager shall ensure that waste is stored in accordance with [VS-0009B](#) Visual Standards.

The Site Manager shall ensure that all Waste Electrical and Electronic Equipment (WEEE) is disposed of in accordance with the WEE Regulations 2016 and the Duty of Care Regulations (Environmental Protection Act 1990).

Some WEEE is classified as hazardous/special waste. This includes WEEE that contains:

- Polychlorinated Biphenyls (PCBs)
- Ozone Depleting Substances (ODS) (e.g. fridges and freezers)
- Asbestos
- Cadmium
- Lead
- Cathode ray tubes (CRTs), found in televisions and older computer monitors

The Site Manager shall in accordance with Duty of Care ensure that:

- Waste is deposited and stored in designated areas
- Waste collection and disposal areas are clearly labelled using standard signs to indicate the types of waste which can be deposited in the waste collection/disposal area
- Waste collection containers, e.g. skips are suitable for the type of waste to be collected in them and that they are collected at optimum capacity
- Skips used for the removal of hazardous materials (e.g. contaminated soil) are appropriately lined

Additional guidance on Duty of Care can be found in the Waste Duty of Care Code of Practice (2018).

4.2.4 Hazardous Waste

The Site Manager shall ensure that all hazardous waste is segregated from non-hazardous waste in suitable containers. Refer to [VS-0009B](#) Visual Standards for further guidance.

All hazardous wastes streams must be identified in the [FRM-4121 Site Waste Reduction Plan](#) including:

- Fluorescent tubes
- Waste paint
- Oil
- Mastic cartridges
- Contaminated soil
- Solvents
- Lead acid batteries

The Site Manager shall ensure that all hazardous waste is removed by a licensed waste contractor that holds a valid waste carriers' licence and is transferred to a licensed facility. All necessary waste licences must be obtained and approved by the Contract/Project Manager prior to removal.

All hazardous waste must be managed in accordance with the Hazardous Waste Regulations 2016.

4.2.5 Waste Transfer

The Site Manager shall ensure that:

- A Waste Transfer Note is completed for all movements of controlled waste from site and is kept on record and accessible for 2 years.
- A Consignment Note is completed for all movements of hazardous waste from the site and is kept on record and accessible for 3 years.

4.2.6 Waste Carriers and Disposal Sites

The Site Manager shall ensure that:

- All waste is removed from site by a registered waste carrier, and that a copy of the registered waste carrier licence is held on file.
- Waste is disposed of at sites that hold a waste management licence or waste management exemption which permit the treatment/collection/disposal of the waste type being sent. Copies of the relevant waste management licences and waste management exemption licences should be held on file for the duration of the project.

The SHEQ Manager/Advisor shall undertake routine checks with the Environment Agency to verify the validity of registered waste carrier licences and waste management licences.

4.2.7 On Site Processing of Waste

On sites where the sub-contractor is responsible for the treatment of their own waste, they shall provide the **Contract/Project Manager** the following information prior to commencing work:

- A copy of the process authorisation for the crushing and screening plant is obtained from the crushing contractor.
- A waste management exemption or Mobile Plant Permit (MPP) has been sought from the Environment Agency to permit the on-site processing of the waste.

4.2.8 Sub-Contractor Waste

On sites where the Sub-Contractor is responsible for the removal of their own waste, they shall provide the Contract/Project Manager with the following information prior to commencing work:

- Registered Waste Carrier Licence(s)
- Waste Management Licence/exemptions for the disposal sites.
- Copies of Waste Transfer/Consignment Notes

4.2.9 Waste Records

The Site Manager shall maintain records of the following:

- Registered Waste Carrier/Broker Licences
- Waste Management Licences
- Waste Management Permits and Exemptions

4.3 Water Management

4.3.1 Site Planning and Identification

The Site Manager shall ensure that a site plan of all drainage, water systems and discharge points is maintained up to date.

The project plan should address whether the site is situated in a Source Protection Zone (SPZ), as defined by the Environment Agency.

Mobile plant servicing areas and re-fuelling points shall be undertaken in defined areas on the site only. Such areas shall be located at points remote from sensitive receptors, such as surface water drains and at least 20 metres away from watercourses.

Steam cleaning shall wherever practical be undertaken on impervious hard standings that drain ideally to an oil interceptor. The use of detergents shall not be permitted unless facilities are in place to prevent emulsified oil entering the oil interceptor.

4.3.2 Emergency Response Planning

The Contract/Project Manager shall develop an emergency response plan [FRM-4509 App7](#) to cover any likely water pollution incidents that may arise from the activities identified in the [Project Environmental & Sustainability Plan FRM-4509-App8](#).

In instances when an actual or suspected uncontrolled release of pollutants occurs to a water course, surface water drains or groundwater, the Site Manager shall record the incident on the 'Airsweb' reporting system and immediately inform the SHEQ Manager/Advisor and Environmental Advisor.

Where a spillage has been significant the Site Manager/Project Manager shall inform the Environment Agency.

If accidental pollution should occur the Site Manager shall make all efforts to stop, contain and deal with the pollutant without compromising safety and shall report the incident via the 'Airsweb' reporting system.

4.3.3 Abstraction

On sites where activities require water abstraction the Contract/Project Manager shall apply for a water abstraction or impoundment licence from the Environment Agency. There are 4 types of licence for water abstraction:

- Full licence – for most types of abstraction over 20 cubic metres a day
- Transfer licence – to move over 20 cubic metres of water a day from one source to another
- Temporary licence – to abstract more than 20 cubic metres of water a day over a period of less than 28 days
- Impoundment licence – to create an impoundment structure such as a sluice, weir or dam

On sites where abstractions are less than 20 cubic metres a day a licence is not required, provided that the abstraction is part of a single operation. If abstraction from the same source occurs at multiple points the exemption only applies if the combined total of all abstractions is less than 20 cubic metres a day.

Where abstraction takes place the Site Manager shall monitor the abstraction and water usage shall be recorded.

4.3.4 Discharge

On sites where activities require discharge of water the Contract/Project Manager shall apply for a discharge permit from the Environment Agency. A discharge permit will be required if liquid effluent or waste water is discharged:

- Into surface waters, for example, rivers, streams estuaries, lakes, canals and coastal waters
- Onto the ground, for example, discharging effluent to ground via an infiltration system

For some activities a site does not require a permit:

- To discharge uncontaminated water, for example, clean rainwater from roofs or small areas of hardstanding to surface water
- To discharge uncontaminated water collected from public roads and small parking areas (that's been through a maintained oil separator or sustainable urban drainage system) to surface water
- For certain low-risk groundwater activities

Where waste water/trade effluent is to be discharged to sewer the Contract/Project Manager must obtain a trade effluent discharge consent from the water provider in accordance with the Water Industry Act.

Trade effluent is any liquid waste resulting from non-domestic activity including:

- Waste water contaminated with oils, chemicals and solvents
- Liquid process wastes
- Detergents
- Condensate water from compressed air installation
- Cooling and wash water
- Biodegradable liquids

The Contract/Project Manager shall obtain a new trade effluent consent if:

- The volume or composition of the discharge changes
- The site is no longer able to comply with the conditions of the consent
- The site stops the discharge for more than 2 years then wants to start it again

The Site Manager shall ensure that all conditions stated in a discharge permit and/or discharge consent are adhered to. This includes undertaking regular inspections of all drainage systems, collection ditches, interceptors and watercourses.

The Site Manager, in planning or carrying out any works shall ensure that precautions are taken to protect groundwater and controlled waters from pollution in accordance with the Control of Pollution Act and the Environmental Protection Act. These measures shall be documented within the [Project Environmental & Sustainability Plan FRM-4509 App8](#).

4.4 Noise & Vibration

4.4.1 Licensing and Contractual Requirements

Where appropriate and as required under the Control of Pollution Act 1974, the Contract/Project Manager shall ensure a Section 61 consent has been granted by, or has been obtained from the Local Planning Authority demonstrating best practical means are to be used to minimise noise emissions from site. Any arrangements for noise and vibration abatement shall be implemented as required by the Contract/Project Manager.

4.4.2 Identification of Sensitive Receptors

Prior to starting work any requirements for sensitive receptors of noise and vibration are to be identified by the Contract/Project Manager and recorded within the [Project Environmental & Sustainability Plan FRM-4509 App8](#). As appropriate, all interested parties (e.g. neighbours) are to be pre-notified of any noise and vibration levels associated with activities on site that are likely to be a nuisance including details of these activities, their duration and relevant prevention measures. Noise producing activities are likely to include the following:

- Demolition works
- Operation of plant/machinery
- Site traffic
- Cartridge operated tools
- All forms of mobile equipment

4.4.3 Plant Operation and Maintenance

Only plant and equipment conforming to the relevant standards and regulations on noise emissions should be used on site. All plant and equipment should display the relevant Guaranteed Sound Power label and the CE label.

Where possible all static plant shall be sited appropriately to reduce the impact on the local environment.

4.4.4 Noise and Vibration Abatement

The following factors influence noise and vibrations levels which should be taken into consideration when establishing the noise abatement strategy for sites or locations where noise levels are above the specified limits including:

- Plant and power generation
- Site management and operational methods
- Screening and dampening
- Where appropriate alternative working hours, methods and equipment that produces less noise and vibration should be considered.

All plant and equipment shall be maintained and used in accordance with the manufacturers or suppliers' instructions. If fitted, plant must not be used without noise/vibration control. Noise screens or barriers should be used where practical to reduce noise levels from site where there are sensitive receivers.

4.4.5 Monitoring

Where necessary, compliance monitoring shall be undertaken to ensure the predicted noise and vibration levels are being achieved and maintained.

The Contract/Project Manager and the Site Manager shall ensure that noise and vibration monitoring is carried out at suitable intervals by a competent person using suitable equipment. A record of the measurements taken shall be maintained.

When operations start and unless otherwise specified, readings should be taken more frequently to verify noise levels are reasonable and not in contravention of any set limits.

4.5 Ecology & Biodiversity

4.5.1 Existing Statutory Designations

The Design Manager shall provide the Contract/Project Manager with an up to date plan of the land under United Living's control with the 'Statutory Designation' boundary clearly identified. The plan shall be accompanied by any supporting 'Statutory Designation' documentation summary of pertinent conditions and responsibilities.

4.5.2 Survey

If an ecological arboriculture (tree) or protected species survey has been provided by the vendor this shall be distributed by the Design Manager to the Contract/Project Manager. If there has been no ecological, arboriculture or protected species survey undertaken then an appropriate approved consultant(s) shall be appointed by the Design Manager to undertake the necessary survey.

Ecological Consultants employed to undertake surveys on behalf of United Living shall be a member of one of the following organisations and have at least three years' experience in the field of ecological impact studies/ assessments:

- Association of Wildlife Trust Consultancies (AWTC)
- Institute of Environmental Management and Assessment (IEMA)
- The Institute of Ecology and Environmental Management (IEEM).

Where risks to ecology and biodiversity are identified the Design Manager shall document these in the [FRM-0339](#) Risk & Opportunity Register.

4.5.3 Planning

The Contract/Project Manager shall ensure that any ecological requirements associated with the development are included within the [FRM-4509 App8 Project Environmental & Sustainability Plan](#).

4.5.4 Protected Species

The presence of any protected species or of any land subject to a statutory designation shall be clearly identified in the [FRM-4509 App8 Project Environmental & Sustainability Plan](#).

Where a protected species is identified on company land or on the development site, guidance shall be sought from the Ecological Consultant with regard to the appropriate action. If the required action requires the removal of a species or its habitat then the appropriate licence shall be sought from DEFRA/Natural England. The application for the licence shall be coordinated by the Ecological Consultant.

Protected species include but are not limited to the following:

- Bats
- Great crested newts
- Badgers
- Wild birds
- Reptiles
- Freshwater fish
- Invertebrates

The Site Manager shall ensure that planned measures are implemented to ensure the species and habitat is protected and secure to avoid any unnecessary disturbance, particularly during the breeding season (March – September).

Where there is evidence of disturbance of any protected species or habitat, the nature of the disturbance shall be recorded on the 'Airsweb' online reporting system and communicated to the SHEQ Manager/Advisor and Environmental Advisor.

4.5.5 Biodiversity

Operational and dormant sites provide a wide range of habitats for wildlife and vegetation. The Contract/Project Manager shall, where practicable, ensure that the following is adhered to:

- Demolition or refurbishment of buildings inhabited by protected species shall not take place during the nesting season (March - September), unless measures to relocate the species can be implemented
- Cutting and removal of any stretch of hedgerow or trees shall not take place during the nesting season (March - September)
- Removal of any stretch of hedgerow or trees shall not take place until formal approval is received from the Local Authority.

Where planning requires the site to have a Biodiversity Action Plan then this shall form part of the [FRM-4509 App8 Project Environmental & Sustainability Plan](#) and the development shall comply with the conditions stipulated.

4.5.6 Protected trees

Where trees are protected by a Tree Preservation Order (TPO) or are located within a conservation area, appropriate tree protection in accordance with the Town and Country Planning Act shall be implemented.

Protected trees, including any trees within a conservation area shall not be damaged, interfered with, pruned or felled without prior written permission from the Tree Preservation Officer from the Local Authority.

Materials shall not be stored within tree protection zones and no mechanical excavation shall be permitted in the vicinity of protected trees. If it is necessary to provide service trenches then these must be hand dug.

For further guidance refer to the British Standard for trees in relation to design, demolition and construction (BS5837).

4.5.7 Noxious and Invasive Weeds

The Site Manager shall ensure that sites are kept free of aggressive, agricultural and noxious weeds in accordance with legislation.

If invasive weeds (e.g. Japanese Knotweed, Giant Hogweed and Himalayan Balsam) are present on the site then arrangements must be made for the treatment/removal of the weeds by an approved specialist contractor.

Upon discovery of Invasive Weeds, the Site Manager must ensure that all affected areas are clearly identified and isolated with restricted access fencing.

In addition to fencing, any vehicles leaving the area should either be confined to haulage routes protected by root barrier membranes, or be pressure washed.

Method statements shall be sought from the contractor prior to any works being undertaken and approved by the SHEQ Manager/Advisor.

Any contractor providing advice on the use of herbicide treatment must have BASIS registration and the person carrying out the spraying must hold a certificate of technical competence for herbicide use or work under the direct supervision of a certificate holder.

All weed material must be treated as controlled waste. The Site Manager must ensure that the material is removed by a registered waste carrier and that it is only disposed of by an authorised landfill site.

Control of Ragwort must be carried out in accordance with the Ragwort Control Act. Where Ragwort is identified on site, arrangements shall be made for its treatment by an approved specialist/contractor.

4.6 Contaminated land

4.6.1 Risk and Hazard Identification

The **Design Manager** shall ensure that a contaminated land survey is undertaken on all potential development sites to establish what if any risks and hazards are present. If necessary a Phase 1 investigation shall be undertaken.

On the basis of the contaminated land survey and/or the Phase 1 environmental assessment, if undertaken, appropriate measures shall be employed to further investigate any potentially contaminated ground. This shall be typically achieved via an intrusive site inspection (Phase 2 assessment).

4.6.2 Planning

The Contract Manager/Project Manager shall ensure that adequate control measures for dealing with contaminated ground are included in the [FRM-4509App8 Project Environmental & Sustainability Plan](#).

4.6.3 Identified Contaminated Ground

Where contaminated ground has been identified and information pertaining to the contamination made available the following points shall be addressed by the Design Manager at tender stage and Contract Manager/Project Manager at contract stage, as appropriate:

- Assess the adequacy of information provided in respect of the contamination
- Request more information from relevant parties if required
- Carry out Risk Assessments, prepare method statements and adopt appropriate working methods for dealing with the contaminated ground in line with the Contract requirements
- Clearly identify contaminated areas on site and ensure that site personnel are informed of the prevailing conditions on site and the associated work methods including requirements for Personal Protective Equipment.

4.6.4 Handling Contaminated Ground

A detailed risk assessment shall be prepared prior to working in, around or with contaminated ground and working methods shall be fully documented.

Where possible, contaminated spoil shall not be stockpiled. If necessary, stockpiling shall be on hard standing to prevent migration of pollutants to underlying ground.

Surface run-off and drainage from contaminated stockpiles shall be controlled through collection and treatment or safe disposal.

During boring, digging, excavating and other similar activities, the uncovered ground shall be visually inspected for signs of contamination. These include:

- The release of noxious fumes and smells (e.g. solvents, petrol, oils, chemicals)
- Discoloured soil (e.g. chemical residues)
- Fibrous texture to the soil (e.g. asbestos)
- Presence of foreign objects (e.g. chemical containers)
- Evidence of previous workings
- Evidence of underground structures and tanks
- Made ground
- Old drains

When unexpected ground contamination is discovered on site then the Site Manager shall:

- Stop work in the contaminated area immediately
- Clearly identify and prevent access to the contaminated area
- Report the incident via the 'Airsweb' reporting system
- Seek further instruction from Consulting Engineer/Contract Manager/Project Manager or other such person named in the contract
- Seek expert advice if required

4.6.5 Remediation

As part of the site clearance, ground preparation and development process any contaminated ground shall be remediated in accordance with the Part 2A of the Environmental Protection Act. Specialist sub-contractors employed to carry out remediation shall provide full method statements of their process and control activities.

Once contaminated ground has been remediated checks on the effectiveness and completion of the remediation shall be sought from the appropriate authority.

4.7 Material storage

4.7.1 Risk and Hazard Identification

The Contract/Project Manager shall plan adequate control measures to minimise the likelihood of loss, damage, and degradation to the quality of materials stored on site and pollution arising from the storage of materials on site.

Control measures shall be recorded in the [FRM-4509 App8 Project Environmental & Sustainability Plan](#).

4.7.2 Fuel, Oil and Chemical Storage

The Site Manager shall ensure:

- All storage tanks are labelled to indicate the nature of the contents and the storage capacity
- All fuel, oil and chemical storage areas shall be designated as 'No Smoking' zones

All bulk storage tanks shall be bunded to a minimum capacity of 110% of the largest tank capacity with the exception of mobile bowsers. For constructed bunds, the bund size calculations shall be available for inspection.

All mobile fuel bowsers shall be controlled by appropriate work instructions to minimise the risk of pollution to ground and surface water. Emergency spill kits shall be provided.

Drums of lubricants, additives, admixtures and chemicals shall be stored within a bund, capable of holding 110% of the capacity of the largest drum to be stored therein. Where refuelling takes place and/or static fuel powered plant is in use a drip tray or plant nappy will be required to be used.

All bunds and tanks shall be:

- Constructed to be impervious to the stored materials
- Maintained and kept secure
- Kept free from build-up of water, spillage and debris
- Inspected regularly to ensure they do not leak

All pumps, tanks, valves and pipework shall be maintained and free of leaks. Where inlet pipes are external to the containment bund, drip trays shall be provided beneath the inlet pipes to contain any spillage arising.

The Contract/Project Manager shall develop an [emergency response plan FRM-4509 App7](#) to cover any instances of fuel, oil and chemical spills that may arise from the activities identified in the [Project Environmental & Sustainability Plan FRM-4509 App8](#).

The Site Manager shall record any spill incidents via the 'Airsweb' reporting system and immediately inform the SHEQ Manager/Advisor and Environmental Advisor.

4.7.3 Delivery, receipt and discharge

All deliveries shall be supervised by a competent person.

The receipt and discharge of all deliveries of fuel, oil and chemicals shall be supervised by a competent person to prevent spillages arising from overfilling.

All fuel dispensing systems shall be capable of being isolated to control potential leaks and minimise the risk of vandalism. Isolation valves shall be labelled, easily accessible and capable of being locked.

Where a pump feed is used for the re-fuelling of vehicles the dispensing nozzle shall be fitted with an automatic cut off device.

4.7.4 Compressed Gases

Designated secure well-ventilated storage areas shall be provided for gas cylinders. The location shall consider any adjacent hazards.

Oxygen and fuel gas cylinders shall be stored separately. Separate storage shall be provided for different types of fuel gases, e.g. propane and acetylene.

All gas cylinders not in use shall be secured or stored in a secure compound to prevent damage to the cylinder valves.

4.7.5 Construction Materials

Materials for incorporation into the building shall be tidily stored in designated areas to ensure integrity is maintained and damage is not incurred.

Aggregates, either delivered or arising from the crushing of material on site shall be stored in demarcated areas. Consideration shall be given to the location of aggregate storage areas to ensure where possible they are sheltered and remote from sensitive receptors.

4.7.6 Top Soil, Sub-Soil and Overburden

Where top soil, sub-soil and overburden has been stripped from the site and is to be retained for subsequent landscaping works, the top soil, sub-soil and overburden stockpiles shall be segregated to prevent cross contamination.

Topsoil, subsoil and soil-forming material shall only be stripped when they are in a dry and friable condition, where possible to avoid movement of soil during the months of November, December, January, February and March, or when there are pools of water on the soil surface. If unavoidable then site should take precautions during the movement.

Top soil and sub-soil heaps shall be shaped so as to avoid collection of water on the surface, shall not be traversed by heavy vehicles or machinery except in the course of stacking, maintenance or re-spreading. Each stockpile shall have adequate signage (i.e. soil hazardous classification) for the duration of the storage period.

The Site Manager shall ensure that top soil, sub-soil and overburden is stockpiled in accordance with the Construction Code of Practice for the Sustainable Use of Soils on Construction Sites.

4.7.7 Waste Materials

Waste materials shall be stored in designated areas and within appropriate skips in accordance with section 4.2.3 of this procedure.

4.8 Archaeology

4.8.1 Site Identification/Pre-Tender/Pre-Construction Stages

The Design Manager shall ensure where necessary, that the archaeological potential of the site is established in the initial site environmental assessment.

Where risks to archaeology are identified the Design Manager shall document these in [the FRM-0339](#) Risk & Opportunity Register.

If the initial environmental assessment identifies the likelihood of the need for an archaeological survey then the appropriate bodies and specialist consultant shall be advised, ensuring that the archaeological survey shall satisfy relevant town and country planning legislation.

If the planning permission requires an archaeological assessment of the site, then an archaeologist shall be appointed to prepare a written scheme of investigation and to under-take any necessary fieldwork in order to discharge the planning condition.

4.8.2 Construction Phase

If unexpected finds are discovered during the work on site, the Site Manager shall immediately cease all work in the affected area which shall be clearly demarcated and quarantined.

The Site Manager shall report the find as an incident on the 'Airsweb' reporting system and immediately inform the SHEQ Manager/Advisor and Environmental Advisor

4.9 Energy and Utilities

Energy consumption resulting from United Living's operations is as a major environmental impact due to the carbon emissions resulting from non-renewable energy sources. To reduce the impact measures shall be implemented to monitor and record energy and utility usage. The measures established shall be identified in the FRM-4509 App8 Project Environmental & Sustainability Plan.

When possible, all of the following energy and utility usage shall be recorded on sites and permanent locations:

- Electricity
- Gas oil (and all other fuels)
- Natural gas
- Water

Under Article 8 of the EU Energy Efficiency Directive (implemented as ESOS Regulations in the UK) and the SECR Regulations, United Living must report its energy consumption. Usage will be monitored and recorded on a monthly basis via the Environmental module in the 'Airsweb' reporting system.

Site specific energy usage and carbon emission targets will be established based on the Group Sustainable Business Strategy. Any significant changes in consumption or deviation from project targets will be investigated and accounted for.

5 TRAINING

5.1.1 Training Responsibilities

The Contract/Project Manager shall ensure that relevant and sufficient environmental training is given to all United Living employees and personnel working on site.

5.1.2 Site Inductions

The Site Manager is responsible for ensuring that:

- The generic site induction is customised so that it is sufficient and suitable to meet the requirements of the activities which impact the environment.
- All permanent site staff including United Living and subcontractors are given an environmental site induction using the [FRM-0325](#) Site Induction prior to starting work on site.
- The [FRM-0323](#) Site Induction Attendance Register is completed by all persons after receiving a site induction.

5.1.3 Toolbox Talks

The Site Manager is responsible for ensuring that:

- Competent persons undertake regular (as often as required) environmental toolbox talks with United Living employees and submit an [FRM-4593](#) Toolbox Talk Attendance Register.
- Subcontractors undertake toolbox talks with their direct employees and submit an [FRM-4593](#) Toolbox Talk Attendance Register to be retained on file.
- A competent person assesses the site operations which have a potential environmental impact then creates a relevant talk to deliver.

5.1.4 Updating Site Inductions and Toolbox Talks

The Site Manager shall ensure updated site inductions and environmental toolbox talks are delivered when:

- A new or increased environmental risk is identified
- Personnel are given a change of responsibility
- There is a significant change to the workplace/site
- Systems of work are changed
- New technologies are introduced

5.1.5 Environmental Awareness Training

All United Living Managers working on site shall be assigned to an Environmental Awareness training course, to be completed via the United Living e-Learning system.

Guidance on completing the training can be sought from the Learning and Development Team.

5.1.6 Site Specific/Specialist Training

The Contract/Project Manager shall ensure that all employees are provided with additional environmental training if and when required.

The Contract/Project Manager must ensure that the [FRM-4509 App9 Environmental Risk Evaluation & Assessment](#) is carried out to identify specific activities which may require additional training:

- Site Environmental Awareness Training Scheme (CITB approved)
- CIRIA Environmental good practice on site (IEMA approved)
- BREEAM Site Sustainability Manager training (BRE approved)
- BREEAM Awareness training (BRE approved)
- Spill Management Training (RoSPA approved)

Once the requirement for training has been identified the Contract/Project Manager shall arrange for the training to be carried out. The training must be certified by the appropriate body i.e. IEMA, RoSPA, CITB etc). Advice and guidance can be sought from the SHEQ Manager/Advisor and Learning and Development.

5.1.7 Minimum Requirements

All United Living employees and subcontractors working on site shall be able to understand:

- Any environmental training relevant to their role / the tasks they are being asked to perform
- The signage used around the site relating to environmental regulations, best practice, emergency procedures etc
- The content of the site inductions and toolbox talks
- Any instruction given to them during an environmental emergency

6 INSPECTIONS

The Site Manager/Project Manager is responsible for:

- Carrying out routine visual inspections ensuring that environmental control measures are fully implemented and monitored, including compliance with relevant legislation and good practice.

SHEQ Managers/Advisors with the assistance of the Environmental Advisor are responsible for:

- Ensuring that this procedure and all relevant control measures are adhered to by carrying out regular PIT Inspections and recording all findings in the 'Airsweb' reporting system.

Project Leaders/Senior Managers are responsible for:

- Reviewing the management of the environmental risks and recording comments in the Visiting Managers Report (VMR) via the 'Airsweb' reporting system.

7 DOCUMENTATION

Environmental management requires the following documentation to be used on all United Living projects.

Document number	Title
FRM-4509	Construction Phase HSEQ Plan
FRM-4509 App7	Emergency Response Plan
FRM-4509 App9	Environmental Risk Evaluation & Assessment
FRM-4122	Sustainability Strategy
FRM-4509 App8	Project Environmental & Sustainability Plan
FRM-0339	Risk & Opportunity Register
FRM-0325	Site Induction
FRM-0323	Site Induction Attendance Register
FRM-4121	Site Waste Reduction Plan
POL-4051	Sustainability & Environmental Policy
FRM-4593	Toolbox Talk Attendance Register
VS-0009B	Visual Standards

8 REFERENCES

- Ancient monuments and Archaeological Areas Act 1979
- Anti-social Behaviour Act 2003
- Building Regulations (Amendment) 2012
- Conservation of Habitats and Species Regulations 2010
- Construction Code of Practice for the Sustainable Use of Soils on Construction Sites
- Contaminated Land (Amendment) Regulations 2012
- Control of Pollution Act 1974
- Control of Pollution Act (Amendment) 1989
- Control of Pollution (Applications, Appeals and Registers) Regulations 1996
- Control of Pollution (Oil Storage) Regulations 2001
- Controlled Waste (Amendment) Regulations 1993
- Energy Act 2008
- Energy Efficiency Directive (ESOS Regulations 2014)
- Environment Act 1995
- Environmental Damage (Prevention and Remediation) Regulations 2015
- Environmental Noise (Amendment) Regulations 2009
- Environmental permitting: Core guidance 2016
- Environmental Permitting Regulations 2016
- Environmental Protection Act 1990
- Environmental Protection (Controls on Ozone-Depleting Substances) Regulations 2011
- Fluorinated Greenhouse Gas (Amendment) Regulations 2018
- Food and Water Management Act 2010
- Guide for trees in relation to construction (BS5837:2012)
- Hazardous Waste (Amendment) Regulations 2009
- Hedgerow Regulations 1997
- Land Drainage Act 1994
- List of Waste Regulations 2005
- Natural Environment and Rural Communities Act 2006
- Noise and Statutory Nuisance Act 1993
- Noise Emission in the Environment by Equipment for Use Outdoors (Amendment) Regulations 2005
- Non-Road Mobile Machinery (Emission of Gaseous and Particulate Pollutants) (Amendment) Regulations 2014
- Ozone Depleting Substances (Qualifications) Regulations 2009
- Planning (Listed Buildings and Conservation Areas) Act 1990
- Pollution Prevention and Control Act 1999
- Pollution Prevention and Control (Amendment) and Connected Provision Regulations 2004
- Ragwort Control Act 2003
- Salmon and Freshwater Fisheries Act 1975
- Statutory Nuisance (Appeals) (Amendment) Regulations 2006
- The Companies (Directors' Report) and Limited Liability Partnerships (Energy and Carbon Report) Regulations 2018 (Streamlined Energy and Carbon Reporting (SECR))
- Planning (Listed Buildings & Conservation Areas) (Amendment) Act 1990
- Producer Responsibility Obligations (Amendment) Regulations 2010
- Protection of Badgers Act 1992
- Town and Country Planning Act 1990
- Trade Effluents (Prescribed Processes and Substances) Regulations 1992
- Waste Electrical and Electronic Equipment (Amendment) Regulations 2013
- Waste Regulations 2011

- Waste Duty of Care Code of Practice 2018
 - Water Industry Act 1991
 - Water Act 2003
 - Water Act 2014
 - Water Resources Act 1991
 - Water Resources (Abstraction and Impounding) Regulations 2006
 - Weeds Act 1959
 - Wildlife and Countryside Act 1981
 - Wild Mammals Protection Act 1996
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- 1 UL-MS-PRO-NNNN, Title of Interfacing General Management System Procedure
 - 2 UL-MS-WI-NNNN, Title of Interfacing Work Instruction.