

GUIDANCE NOTE

EMS scope (and roles and responsibilities)

The Scope of the Environmental Management System (EMS) is to support Persimmon Homes and its supply chain partners. The EMS provides the common structure for the management of environmental risks.

Our supply and works partners are an integral part of the Group's operations and they will be given every necessary opportunity to provide, and be given feedback, on aspects relevant to the proper operation of the EMS.

How to use the EMS

The documents within this EMS are broken into the following categories, each with a distinct purpose. These categories are:

POL	Policy documents that set out the company's statements of intent
STD	Standards foundation documents outlining the minimum requirements expected to ensure legal compliance, and against which performance will be measured
FOR	Forms documents that are completed following analysis of risk, outlining the planned methods of work to minimise risks and eliminate hazards, so far as is reasonably practicable. Also used to collect evidence to demonstrate compliance
GU	Guidance documents detailing the actions needed to be undertaken the EMS and legal requirements, and against which performance will be measured
TBT	Toolbox Talks documents for use internally and externally for raising awareness of environmental issues
RA	Risk Assessments
ALERT	Environmental Alerts

All EMS documents will be referenced in the format shown below (Xxx is the document title):

Policy

EMS-POL-xxx

Standards

EMS-STD-xxx

Forms

EMS-FOR-999-xxx

999 is the 3-digit number reference of the document

Guidance

EMS-GU-xxx

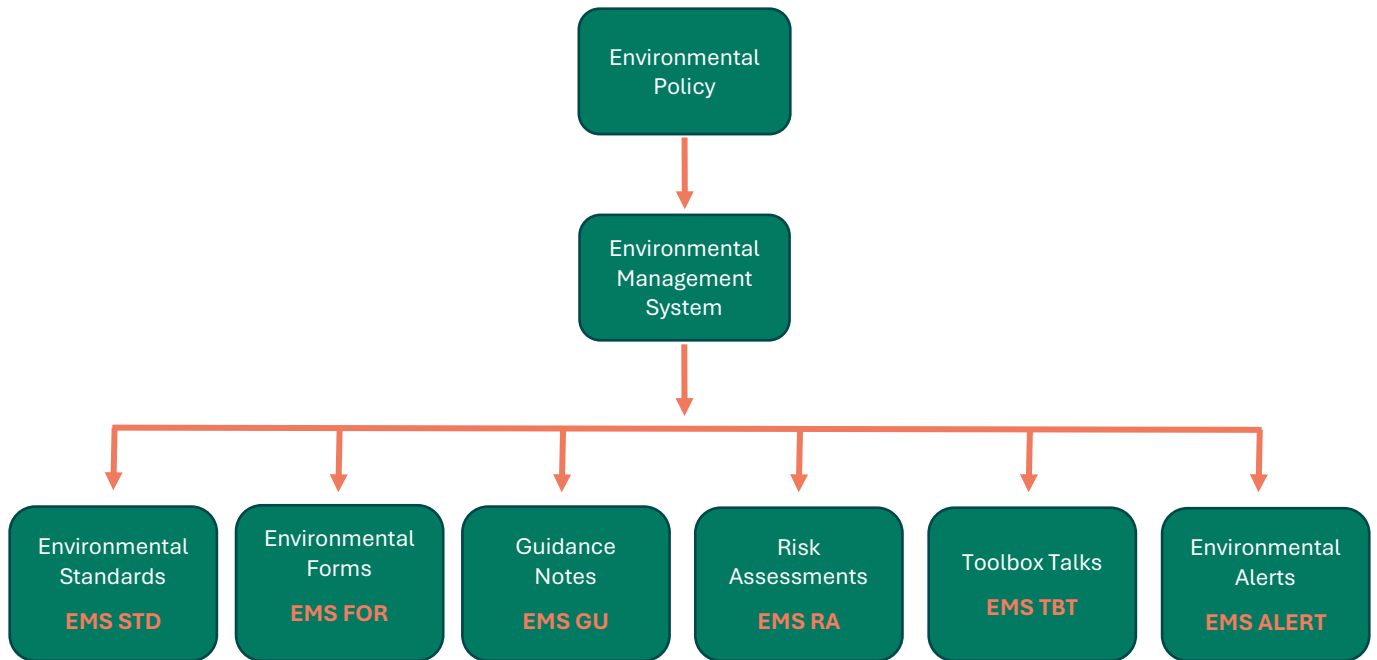
Toolbox Talks

EMS-TBT-xxx

Alerts

EMS-ALERT-xxx

Overview of how the EMS is structured



The Group Environment Manager, along with the Group Health, Safety & Environment Director will be responsible for creating, updating and issuing all EMS documentation. The controls ensure that a consistent approach is applied to review and approve content to the EMS.

Roles & Responsibilities (completing forms)

Please see below for details outlining responsibilities for completion of the relevant forms and their ongoing review.

Pre-construction

Form	Who	Check	When
EMS FOR 001 – Project Environmental Plan Template	Technical (with support from Commercial & Construction)	HS&E	Completed by PS2 + for all new phases. Must be ready for PC start on site
EMS FOR 002 - Aspect & Impact Assessment	Technical (with support from Commercial & Construction)	HS&E	As above
EMS FOR 003 - Project Environmental Plan	Technical (with support from Commercial & Construction)	HS&E	As above
EMS FOR 004 - Surface Water Management Plan <i>Only required where an activity is identified as posing a significant and or</i>	Technical (external consultants can be used to a SWMP.	HS&E	As above

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<i>medium risk to groundwater/ surface waters (when completing EMS-FOR-002)</i>			
EMS FOR 005 – Dust Management Plan (this is an adhoc form and does not need completing during the pre-construction stage)	Technical	HS&E	Only required to be completed if requested by LPA e.g. following complaints
EMS FOR 012 – Materials Planning Checklist (England & Wales only) & (Scotland)	Technical	HS&E	Completed by PS2 + for all new phases. Must be ready for PC start on site
EMS FOR 013 – Waste Duty of Care Schedule	Commercial	HS&E	As part of Groundworks tender
EMS FOR 014 – Recycled Aggregate Checklist	Commercial	HS&E	When placing orders for recycled aggregate

EMS FOR 001 – Technical Department should use this template as a basis for the PEP folder.

EMS FOR 002* – Technical Department should complete this form when in receipt of all relevant pre-construction information i.e. ecology surveys, SI report etc.

* an A&I assessment is required for all new phases of a development.

EMS FOR 003* – Technical Department should complete this form. The Commercial Department should assist with completion of the Waste Duty of Care Schedule by providing details of all relevant waste carriers / contractors who are to be used on the project. This must include PDF / print out checks for all waste carriers / disposal sites to be used.

The Project Environmental Plan must be signed off by both the Technical Director and Group Health, Safety & Environment Advisor prior to being accepted (and signed for) by the Construction Director or Contracts Manager.

* a Project Environmental Plan is required for all new phases of a development.

EMS FOR 004 – Technical Department should complete this form or appoint an external consultant to produce the plan. The Plan is only required where there is a **MEDIUM** to **SIGNIFICANT** risk posed to groundwater and or surface waters by one of more of our activities (assessed through the Aspect & Impact Assessment).

EMS FOR 005 - This is only likely to be required if a specific planning requirement is in place, or if requested following complaints from LPA / Environmental Health Officer. Technical Department can use this template form or appoint an external consultant to produce the plan.

EMS FOR 012 - Technical Department should complete this form. All sites proposing to reuse excavated material, which is either site won, or to be imported from another development site, must complete the checklist. Depending on the answers to the questions posed will determine the actions required.

EMS FOR 013 – Groundworks subcontractors must complete this form as part of the tender process. They must provide details of proposed waste carriers and waste destinations for where they intend to dispose of waste.

EMS FOR 014 – Commercial Department should complete this form when placing orders for recycled aggregates. Checks must be made before orders are placed (for recycled aggregates) that the supplier

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can provide the relevant information. Any recycled aggregates brought onto site without this information may be deemed waste and subject to relevant waste legislation. Following this guidance means we have exercised all due diligence and will not be subject to Landfill Tax via HMRC.

Construction

Form name	Who	Check	When
EMS FOR 002 - Aspect & Impact Assessment	Construction	HS&E	Ongoing review, every 3 months as minimum
EMS FOR 003 - Project Environmental Plan	Construction	HS&E	Ongoing review, every 3 months as minimum
EMS FOR 004 - Surface Water Management Plan	Technical, Construction	HS&E	If in place - ongoing review, every 3 months as minimum
EMS FOR 005 – Dust Management Plan	Technical, Construction	HS&E	If in place - ongoing review, every 3 months as minimum
EMS FOR 006 - Regulatory Authority Contact	Construction	HS&E	Adhoc – only when required
EMS FOR 006a – Enforcement Notice Review Report	HS&E	HS&E	Adhoc – only when required
EMS FOR 007 – Environmental Incident Report	Construction	HS&E	Adhoc – only when required
EMS FOR 008 – Dust Monitoring	Construction	HS&E	Adhoc – only when required
EMS FOR 009 – Noise Monitoring	Construction	HS&E	Adhoc – only when required
EMS FOR 010 – Water Discharge Monitoring	Construction	HS&E	Adhoc – only when required
EMS FOR 011 – Permit to Pump	Construction	HS&E	Adhoc – only when required
EMS FOR 014 – Recycled Aggregate Checklist	Commercial	HS&E	When placing orders
EMS FOR 015 – Silt Control Checklist	Construction	HS&E	Adhoc – only when required
EMS FOR 016 – Spill Response Plan	Construction	HS&E	Ready for when Persimmon take PC role.
EMS FOR 018 - Drain Protection Monitoring Form	Construction	HS&E	Depends on site activities. Refer to Water & Silt Management Standards

EMS FOR 002 – Construction teams are responsible for reviewing the A&I assessment on a quarterly basis, or as and when a significant change occurs e.g. discovery of unexpected bat roost etc. HS&E Advisors will check this as part of their regular visits.

EMS FOR 003 - Construction teams are responsible for reviewing the Project Environmental Plan on a quarterly basis. Section 1.1 (Revision Record) should be updated with relevant updates. In the event of no change on site a record should still be made of the review (date and initials).

EMS FOR 004 – if in place, the Technical Department should review the plan on an ongoing basis and communicate any changes to relevant teams / subcontractors.

EMS FOR 005 - if in place, the Technical Department should review the plan on an ongoing basis and communicate any changes to relevant teams / subcontractors.

EMS FOR 006 – Construction teams are responsible for recording any regulatory authority contacts when contact is made from EA, NRW, SEPA, Local Authority etc.

EMS FOR 006a – If as a result of the contact an enforcement notice is issued by the regulator the local Group HS&E Advisor or Group Environment Management will complete a notice of contravention review report, aiming to undertake a review meeting with the Managing Director within 10 days after receiving the notice.

EMS FOR 007 - Construction teams are responsible for recording any environmental incidents and observations.

EMS FOR 008 – Construction teams are responsible for monitoring dust if it is deemed necessary e.g. recent complaints received, contact from EHO etc.

EMS FOR 009 – Construction teams are responsible for monitoring noise if it is deemed necessary e.g. recent complaints received, contact from EHO etc.

EMS FOR 010 – Construction teams are responsible

EMS FOR 011 – Construction teams are responsible for monitoring any discharge of water from site. This responsibility may be passed to suitably trained subcontractors (e.g. groundworkers) however this form must be used and passed back to the Construction team for filing in the Project Environmental Plan.

EMS FOR 014 - Commercial Department should complete this form when placing orders for recycled aggregates. Checks must be made before orders are placed (for recycled aggregates) that the supplier can provide the relevant information. Any recycled aggregates brought onto site without this information may be deemed waste and subject to relevant waste legislation. Following this guidance means we have exercised all due diligence and will not be subject to Landfill Tax via HMRC.

Construction teams should check delivery tickets to ensure conformance with the Aggregate Quality Protocol e.g. tickets stamped with statement confirming recycled aggregates conform to the QP.

EMS FOR 015 - Construction teams are responsible for monitoring silt controls in place on site. This responsibility can be passed to suitably trained subcontractors (e.g. groundworkers) however this form must be used and passed back to the Construction team for filing in the Project Environmental Plan.

EMS FOR 018 – Construction teams are responsible for monitoring that drain protection is installed and operating effectively. This responsibility can be passed to suitably trained subcontractors (e.g. groundworkers) however this form must be used and passed back to the Construction team for filing in the Project Environmental Plan.

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