March 2023

Environment Guide

Environment Guide – Getting Your Site Right

Persimmon
Together, we make your home

How To Use This Guide

This guide is designed to ensure that all of our sites put in place effective environmental management controls. This will ensure that all sites not only comply with legislation, but also with environmental best practice, helping us save time and money whilst protecting the environment in which we work. This guide is intended to work alongside the Environmental Management System standards and guidance notes.

Good environmental management requires a team effort between all staff on site, including contractors, subcontractors, designers, clients and suppliers.

Environmental good practice on site has multiple benefits and strikes a balance between the environmental (e.g. pollution prevention), social (e.g. developing good relationships with neighbours) and economic (e.g. reducing costs through resource efficiency) elements of sustainability.

Our activities can have both positive and negative effects on the environment and our neighbours. With effective environmental management, the negative impacts can be minimised and the positive impacts maximised.

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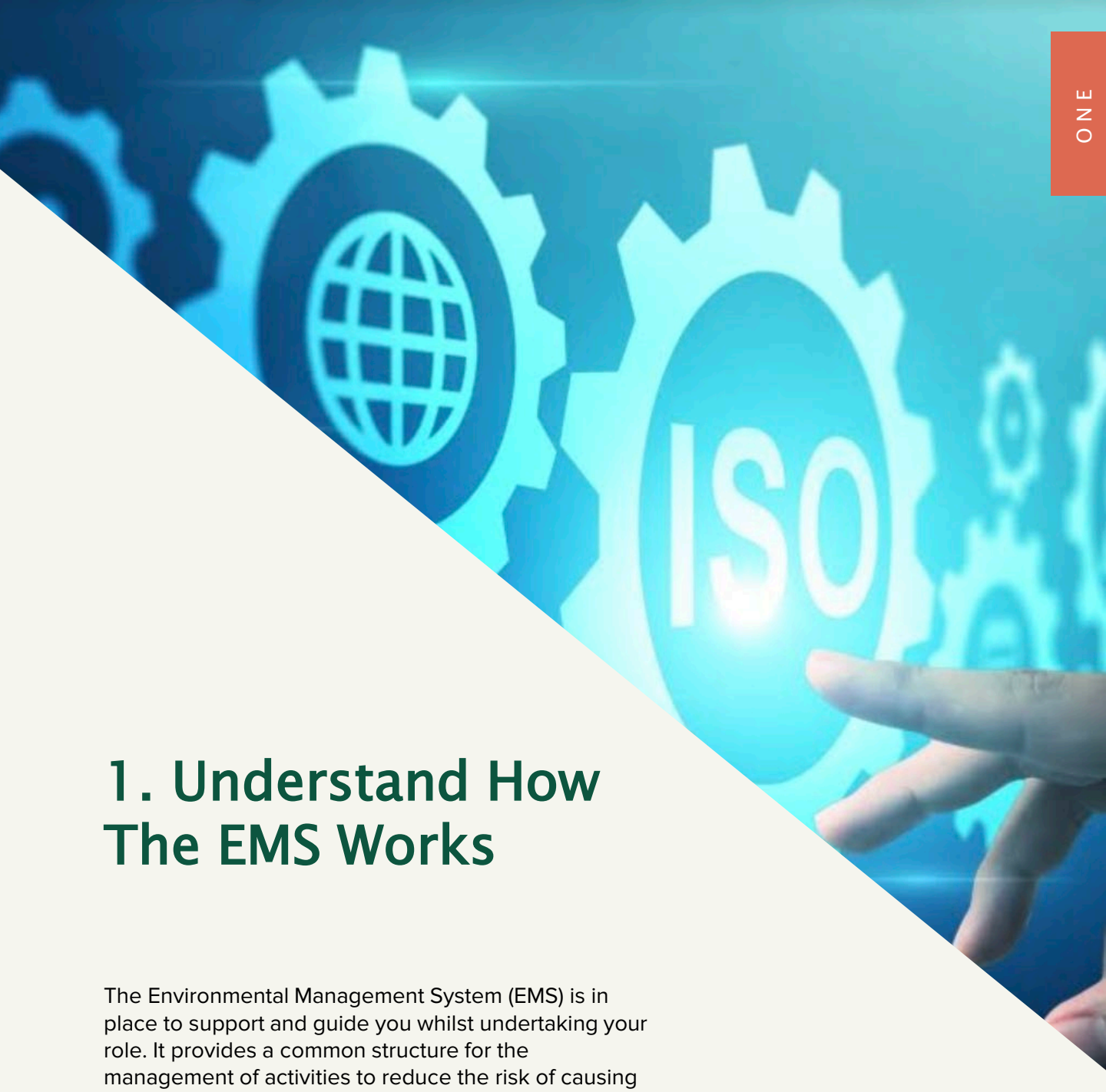


1. Understand How The EMS Works

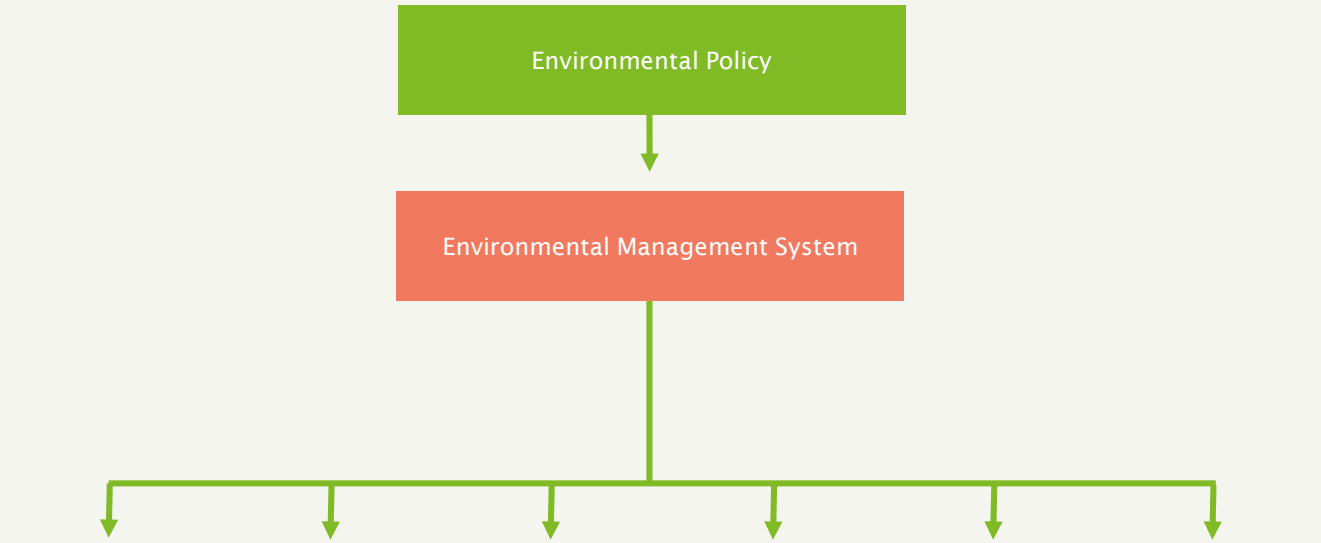
The Environmental Management System (EMS) is in place to support and guide you whilst undertaking your role. It provides a common structure for the management of activities to reduce the risk of causing environmental harm.

You can access the Environmental Policy, Standards, Forms, Guidance Notes, Risk Assessments, Toolbox Talks and Environmental Alerts here.

OVERVIEW OF EMS

Our Environmental Policy outlines what we will do e.g. comply with environmental regulations, understand our environmental impacts, and minimise the risks to the environment etc.

The EMS provides a structured framework, enabling us to fulfil the ambitions as set out in the Policy. It provides a standardised approach in respect of planning, managing and controlling our activities, reducing the risk of environmental harm caused by our activities.



Environmental Standards EMS STD	Environmental Forms EMS FOR	Guidance Notes EMS GU	Risk Assessments EMS RA	Toolbox Talks EMS TBT	Environmental Alerts EMS ALERT
These outline how we will work in order to comply with relevant legislation and Codes of Practice.	Provide the means to record project risks and to plan, manage and monitor our activities.	Activity focused guidance notes which explain how activities must be controlled e.g. concrete washout, fuel setup etc.	Templates for activities where the regulator expects there to be a risk assessment in place.	To support and raise awareness of our supply chain in regard to environmental concerns e.g. nesting birds, tree protection etc.	Learning events, shared by Group where an environmental incident has occurred.

2. What Does A Site Do Before Opening?

The Technical Department will identify all relevant environmental risks and appropriate controls / mitigation prior to starting on site. This will be recorded in the Aspect & Impact Assessment form, which forms part of the Project Environmental Plan

All relevant environmental information will be collated into the Project Environmental Plan (green folder) and handed over to the construction team ready for start on site.

Pre-start - your responsibilities

Ensure you have read the Project Environmental Plan (and appendices) prior to start on site. It is important you understand all of the risks posed by our activities and the controls to be implemented.

Compliance obligations

It is vital that the site has all appropriate compliance obligations in place before starting, i.e. permits / consents, licences, tree or habitat protection measures etc.

Obligations may include but are not limited to:

- Archaeology & heritage
- Tree and/or hedge protection
- Permits (for water abstraction, discharges etc.)
- Protected plant and/or species
- Materials tracking (if a Materials Management Plan is in place)
- Working hours (defined in the planning permission)

The Technical Dept will have obtained all the relevant permissions/licences prior to start on site. You must ensure you are aware of all our obligations and that these are communicated to relevant subcontractors (through Toolbox Talks, inductions etc.)

Where permits and or licences are in place, ensure you understand the environmental requirements and that monitoring is undertaken to ensure we comply with the conditions set-out.

Any breach of a permit and or licence may lead to enforcement action.

3. Starting On Site

Site Documentation

- Ensure that a copy of the Project Environmental Place is in place and held on site
- Check that groundworks contractors are using the waste carriers / waste destinations listed in the Project Environmental Plan (Duty of Care Schedule)
- Any changes to waste carriers and or waste destinations must be approved by Persimmon prior to waste leaving site
- These changes need recording in the Project Environmental Plan

Updates

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).

Waste Documentation

It is a legal requirement to retain paperwork for all wastes removed from site (this includes Persimmons' waste and that of our subcontractors).

Ensure you understand who is responsible for managing this. It is either the Commercial teams responsibility or the Construction teams.

If you are responsible for this then you will need to collate and store physical copies of tickets on site, in the Waste Documentation folder.

Retain copies of all tickets in the folder and return to the office upon completion of the development for archiving.

Environmental noticeboard

- An Environmental Noticeboard must be on display and regularly updated, this can be in the site office or canteen.
- Noticeboards are available via Glendining
- You can find the following documents for display on the cloud:
  - Environmental Policy
  - Emergency Spill Response Poster
  - Environmental Alerts (display latest Alert)
  - Incident & Observation Flowchart
- Your Construction Phase Plan lists the requirements of the Environmental Noticeboard
- Provide environmental posters to help raise awareness of particular issues relevant to your project – these can be found on the cloud.
- Signage is also available via the Glendining Signs catalogue (ecology, fuel, waste signs etc.)

4. Pollution Prevention Control

Below are some simple steps, which must be followed, to minimise the risk of environmental harm from our activities.

Site Accommodation

- All connections from site accommodation must be connected to either a septic tank (pending removal from site) or the foul sewer. Water from sinks etc. cannot be allowed to discharge directly to ground.

COSHH Storage

- Provide adequate containment for the safe storage of COSHH materials e.g. well ventilated, bunded containers or lockable cages for gas bottles.
- Ensure that AdBlue is stored on a bund i.e. not directly over open ground

Concrete Washout

- Provide a dedicated washout area, ensuring it is contained and controlled, as set out in relevant guidance.

Drainage

- Ensure you understand the site drainage and where it leads
- Display the site drainage plan on the Environmental Noticeboard
- Protect surface /storm water drains with EnviroHorns or similar. Avoid the use of gulley pot bags. They do not provide adequate filtration of sediment from water run-off and often result in drains becoming blocked. Drain protection measures require regular inspection and maintenance

Dust, Noise & Vibration

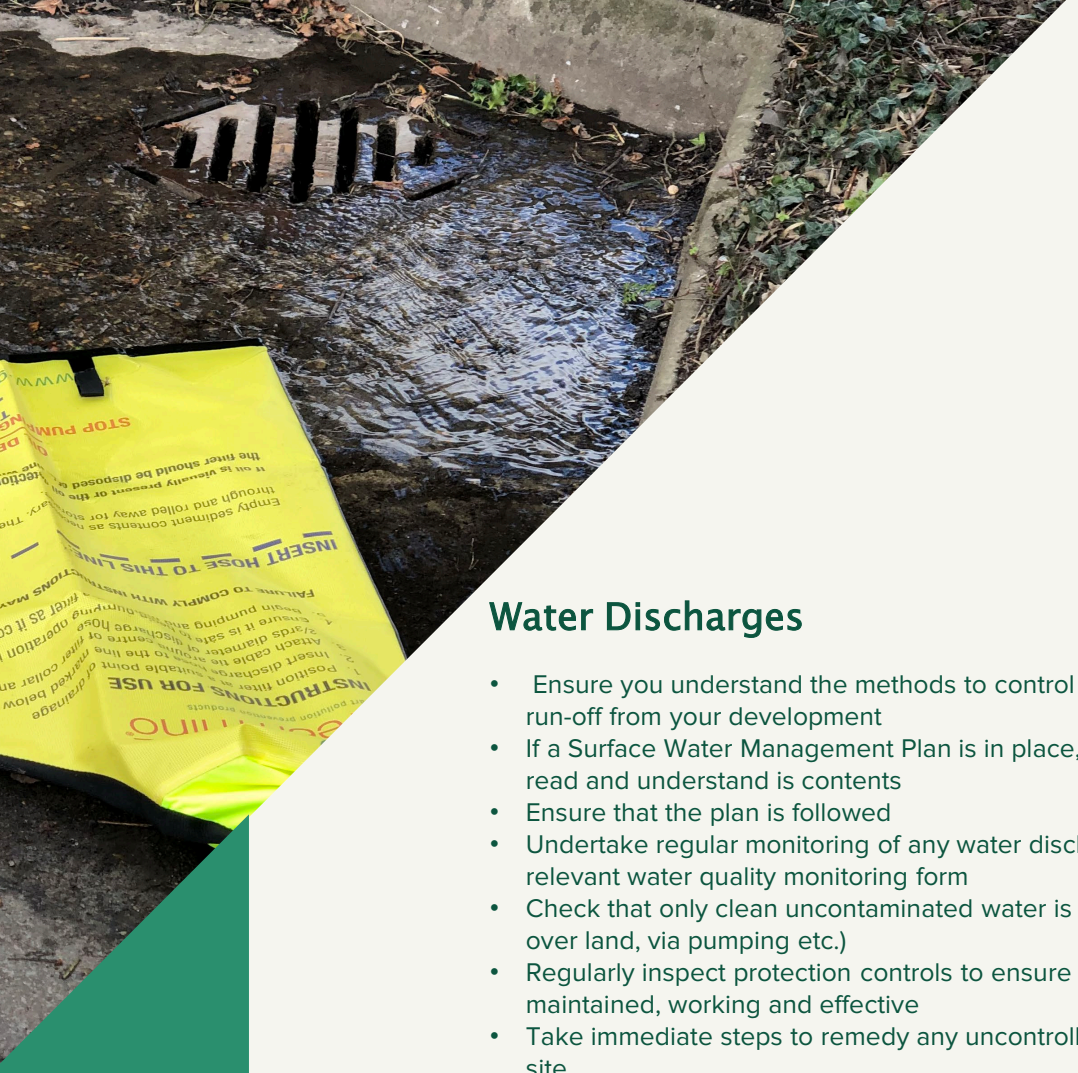
- Ensure you understand the techniques required to manage nuisance, as outlined in the Aspect & Impact Assessment
- Implement controls to control dust at source e.g. use tractor and bowsers and or mist cannons during dry periods to damp down roads, stockpiles etc.
- Store materials / stockpiles which may give rise to dust away from sensitive receptors e.g. residential properties, hospitals etc.
- Only work within agreed hours – communicate to all trades the working hours agreed via planning
- Maintain regular communication with residents, inform them of upcoming works which are likely to have an impact on them
- Ensure monitoring is undertaken and recorded, if required

Fuel Setup

- Make sure your fuel setup, and that of subcontractors, meets the requirements set out in relevant guidance
- Spill kits should be readily available, by all fuel storage areas
- Enviropads must be provided for when refuelling and when using small fuel containers on site e.g. jerry cans

Road Sweepers

- Try to avoid accepting road sweeper waste on-site, where possible
- If unavoidable, ensure a dedicated, contained road sweeper waste area is provided. It must be controlled as set out in relevant guidance



Water Discharges

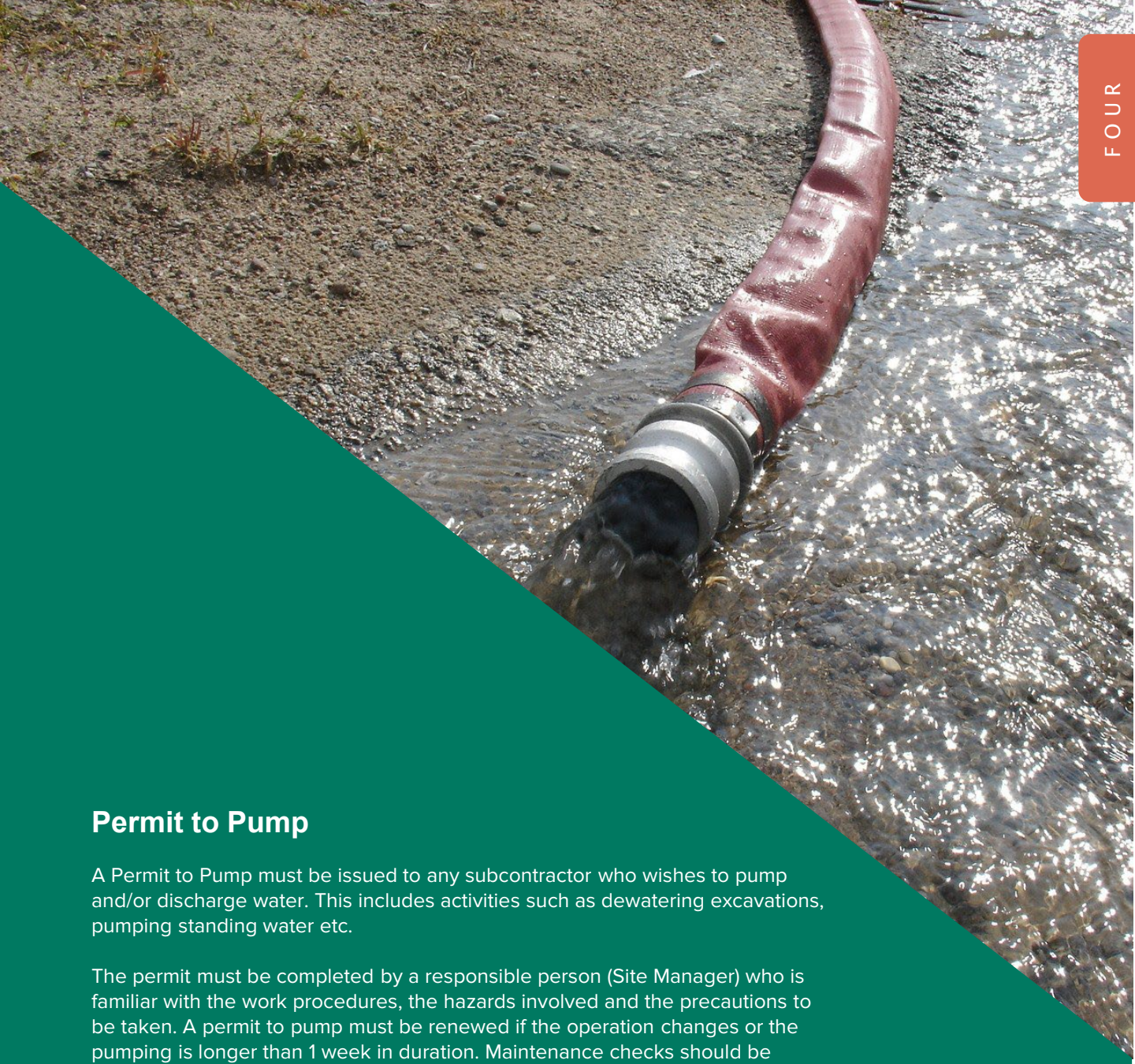
- Ensure you understand the methods to control and treat surface water run-off from your development
- If a Surface Water Management Plan is in place, make sure you have read and understand is contents
- Ensure that the plan is followed
- Undertake regular monitoring of any water discharges and record on relevant water quality monitoring form
- Check that only clean uncontaminated water is leaving site (via drains, over land, via pumping etc.)
- Regularly inspect protection controls to ensure they are well maintained, working and effective
- Take immediate steps to remedy any uncontrolled / silty run-off from site
- Report any concerns or findings to your Group Health, Safety and Environment Advisor immediately to seek advice

Water Abstraction

- Only used authorised water standpipes to abstract water from the network. See relevant guidance for requirements
- Ensure that all individuals operating a water standpipe have completed the CALM Network training and can provide evidence of this e.g. certificate
- CALM Network training can be requested via the LMS (under the construction section)

See Relevant Guidance:

EMS GU – COSHH Storage.
EMS GU – Concrete Washout
EMS GU – Dewatering
EMS GU – Emergency Planning and Spill Response
EMS GU – Fuel, Oil Storage & Use
EMS GU – Managing Dust
EMS GU – Managing Noise & Vibration
EMS GU – Road Sweepers
EMS GU – Temporary Dewatering
EMS GU – Trade Effluent Consent
EMS GU – Use of Water Standpipes
EMS GU – Water Management (protecting drainage and watercourses)



Permit to Pump

A Permit to Pump must be issued to any subcontractor who wishes to pump and/or discharge water. This includes activities such as dewatering excavations, pumping standing water etc.

The permit must be completed by a responsible person (Site Manager) who is familiar with the work procedures, the hazards involved and the precautions to be taken. A permit to pump must be renewed if the operation changes or the pumping is longer than 1 week in duration. Maintenance checks should be carried out on the pump(s), and back up pump(s) available if required.

The Permit to Pump can be found here.

5. Ecological Controls

Relevant risks must be communicated to all relevant staff and subcontractors, whether it is tree protection requirements or protected species in certain areas of the site.

Protection measures, such as fencing, must be monitored to ensure they are in place when required, effective and maintained throughout the works. Where ecological restrictions are in place, these should be communicated via the site specific induction and supported by appropriate Toolbox Talks.

Signage must be provided to identify the presence of protected trees and or species. Signage is available via the Glendining Signs catalogue (see below).

See Relevant Guidance:

EMS GU – Invasive Plants
EMS GU - Tree & Hedgerow Protection
EMS GU – Nesting Birds

Discovery Of Unexpected Ecology

In the event of discovering unexpected ecology (e.g. nesting birds / bat roosts etc.) all work in the immediate area must be stopped and your Group Health Safety & Environment Advisor contacted.

Suspected bird nesting sites must have an appropriate exclusion zone (with signage) established to prevent disturbance. This must be kept in place until such time as the birds leave the nest.

Where suspected bats / roosts are discovered, all work in the immediate area must be stopped and an Ecologist contacted for advice. Do not try to remove or disturb the bats in any way.

It is highly likely an exclusion zone will be required, however, your Ecologist will advise on appropriate mitigation controls.

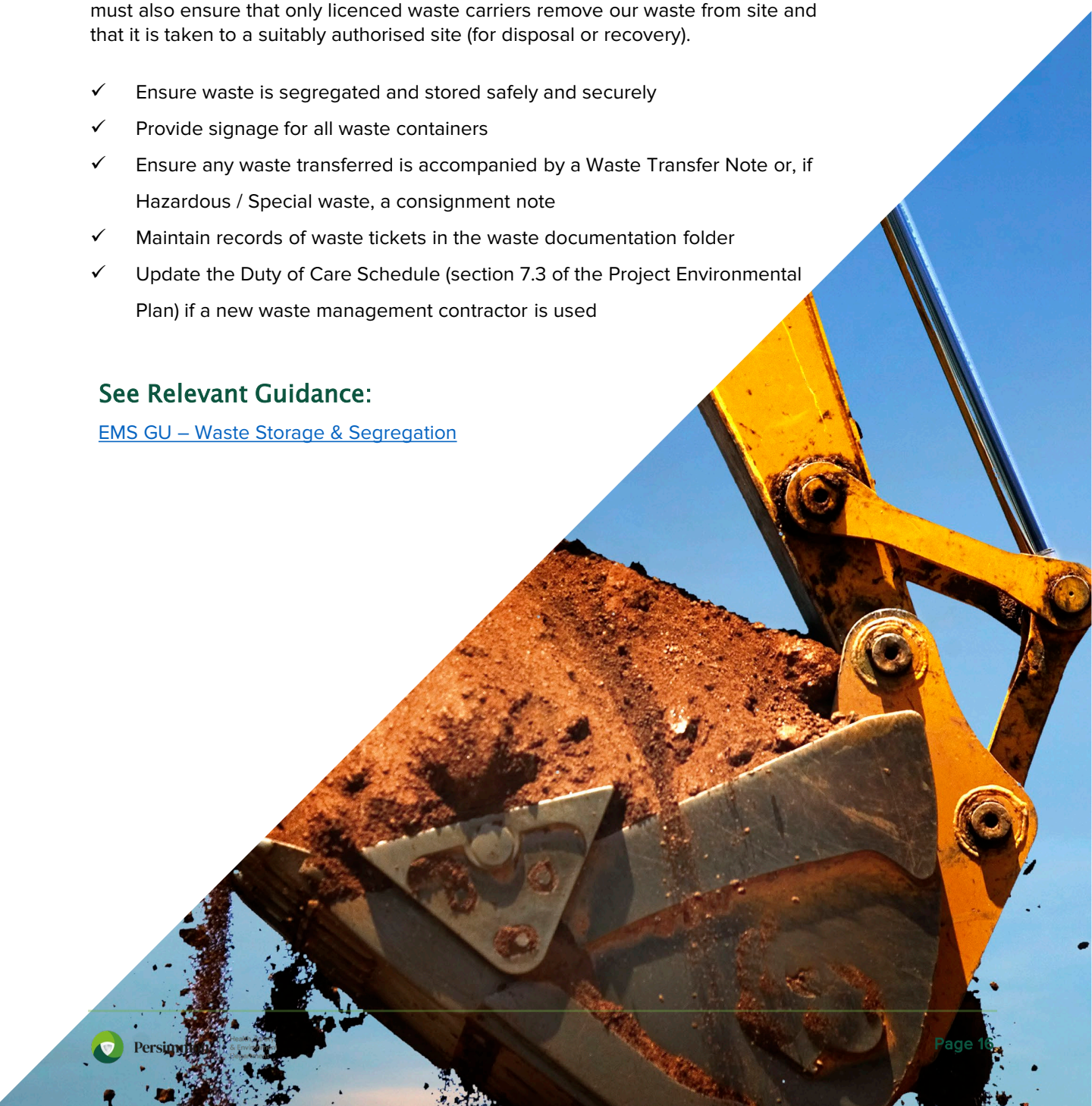
6. Waste Management Controls

Sites must ensure that waste is segregated and stored safely and securely. We must also ensure that only licenced waste carriers remove our waste from site and that it is taken to a suitably authorised site (for disposal or recovery).

- ✓ Ensure waste is segregated and stored safely and securely
- ✓ Provide signage for all waste containers
- ✓ Ensure any waste transferred is accompanied by a Waste Transfer Note or, if Hazardous / Special waste, a consignment note
- ✓ Maintain records of waste tickets in the waste documentation folder
- ✓ Update the Duty of Care Schedule (section 7.3 of the Project Environmental Plan) if a new waste management contractor is used

See Relevant Guidance:

EMS GU – Waste Storage & Segregation



7. Inspections & Monitoring

It is important to check that the controls we are implementing on site are effective. In order to do so we must undertake regular monitoring.

Daily Checks

As part of your general site walk around keep an eye out for:

- ✓ If our activities are giving rise to dust
- ✓ If our activities are giving rise excessive noise
- ✓ Mud and debris on access roads / haul roads
- ✓ Material storage i.e. are they stored correctly as to avoid damage
- ✓ Water run-off from site (on roads etc.)
- ✓ Any discharges of water from site
- ✓ The condition of drain protection
- ✓ Waste controls

Site Managers Weekly Checklist

Complete your weekly checks to ensure that both we, and our subcontractors, are meeting the requirements detailed in our environmental standards. All activities must be well managed as to not cause pollution.

If, as part of your checks, you identify unsatisfactory controls and the potential for an incident to occur the activity should be stopped / made safe and the Group Health, Safety & Environment Advisor contacted for advice, where necessary.

HSMS FOR 014 – Weekly Site Managers Checklist.

Adhoc Monitoring

Dependant on the risk posed by our activities there may be occasions where monitoring for dust, noise and or vibration is required. If so, the monitoring information must be recorded, see below for further guidance.

Dust

Monitoring must be recorded on EMS FOR 008 - Dust Monitoring.

Noise

Monitoring must be recorded on EMS FOR 009 – Noise Monitoring.

Vibration

Specialist contractors must be used where there is a requirement to monitor for vibration.

Water Quality

If discharging any water from site this must be monitored and recorded. For further guidance refer to the Water Quality & Silt Management Standard.

Monitoring must be recorded on EMS FOR 010 – Water Quality Monitoring.

Overview Of Monitoring Requirements

DAILY

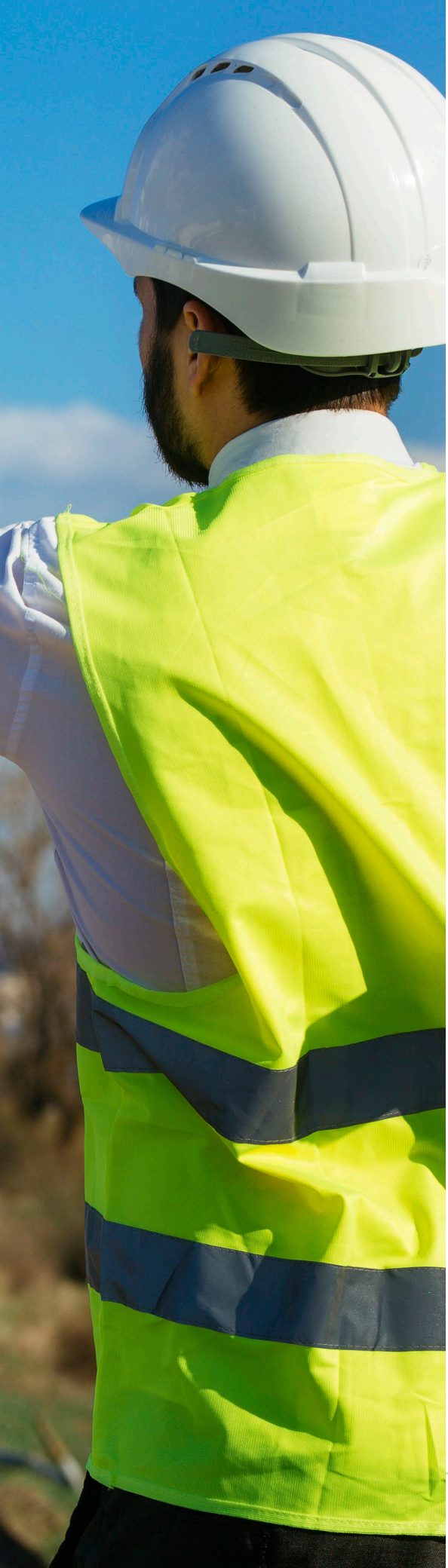
- ✓ Dust
- ✓ Noise
- ✓ Mud & debris on roads
- ✓ Material storage
- ✓ Water run-off
- ✓ Drain protection
- ✓ Waste controls

WEEKLY

- ✓ Chemical, fuel and oil storage
- ✓ Incident controls i.e. spill kits
- ✓ Drain protection
- ✓ Ecological protection
- ✓ General pollution prevention controls
- ✓ Silt control checklist (if req'd)
- ✓ Collate/file waste tickets

QUARTERLY

- ✓ Review & update Project Environmental Plan
- ✓ Review & update Aspect & Impact Assessment
- ✓ Review & update Waste Duty of Care Schedule



8. Training & Awareness

- Site inductions - include any environmental controls for site when undertaking a site induction e.g. ecological controls/protection, waste management controls, fuel storage, water management etc.
- Toolbox Talks - monthly environmental Toolbox Talks should be delivered, relevant to the activities being undertaken on site.
- Ensure RAMS address the risks relevant to the site and that subcontractors specify how they will meet our standards

9. What To Do In The Event Of Regulatory Authority Contact

If a regulatory authority makes contact, whether in person or via letter/email, the Group Health, Safety & Environment Advisor must be contacted immediately.

Regulatory Authorities can include:

- Local Planning Authority (Environmental Health Officers, Tree Officers etc.)
- Environment Agency / Natural Resources Wales / Scottish Environment Protection Agency
- Natural England / Natural Resources Wales / Nature Scot
- Historic England / Cadw / Historic Scotland
- Police (wildlife crime)
- Canals & River Trust
- Water companies

The contact must be recorded on EMS FOR 006 – Regulatory Authority Contact and distributed to site management, Contract Manager, Group Health, Safety & Environment Advisor and Senior Management (if a major or significant incident has occurred which might lead to enforcement action).

10. What To Do in the Event of an Environmental Incident

In the event of an incident, contact your Group Health, Safety & Environment Advisor immediately.

The incident must be recorded on EMS FOR 007 – Environmental Incident Report and distributed to site management, Contract Manager, Group Health, Safety & Environment Advisor and Senior Management (if a major or significant incident has occurred).

FUEL & OIL

Emergency Spill Response – nationwide coverage, 365 days a year, 24/7

In the event of a fuel/oil spillage which cannot be immediately contained on-site, contact our Emergency Spill Response contractor **Adler & Allan** for an immediate site response.

Call **0800 592 827** quoting reference number **PER037.**

An instruction must also be sent to groupoperations@adlerandallan.co.uk

11. What A New Site Manager Must Do (On An Existing Site)

Sometimes you might join a project which is well underway. In this scenario it is important to understand the relevant risks on site. To ensure you understand the risks you must, as a minimum:

- ✓ Read through the Project Environmental Plan
- ✓ Review the compliance obligations, especially any permits, licences, discharge consents etc.
- ✓ Review the aspects and impacts assessment to understand the controls required to manage risks on site.
- ✓ If in place, read through the Surface Water Management Plan
- ✓ Review site drainage plan / location of SUDS / drain protection / discharge points
- ✓ If part of a consortium site – establish who has responsibility for protecting and cleaning out drainage on shared land / roads
- ✓ Discuss waste management arrangements i.e. skip locations, segregation requirements, waste transfer notes etc.
- ✓ Understand where the incident response measures are i.e. spill kits
- ✓ Discuss environmental incident control responses i.e. spillages, dust/noise/vibration reporting requirements
- ✓ Review any previous issues/incidents, if any have been raised
- ✓ Review the Environmental Noticeboard