



Environmental and Sustainability Policy

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Scope of Document

Reference to Environmental policies, the Environmental Protection Act and any other Regulations and Enactments mentioned herein, together with statements relating to responsibilities and obligations for Health and Safety, apply equally to the personnel of William Davis Ltd and Davis (Forest Field) Ltd and any other affiliated concerns of those two Companies, and any reference in this document to " the Company" or " the Group" shall be construed as referring to any of the Companies within the Davis Group operating within the United Kingdom.

SECTION I

General Statement of Intent

To meet with the requirements of the Environmental Protection Act 1990 every effort, so far as is reasonably practicable will be made by the Company to ensure its activities do not have a negative impact upon the environment. William Davis are fully committed to implementing all reasonable measures and controls to minimise any negative impact from its activities on the local and wider environment.

Notwithstanding the general commitment made above, the Company will seek to take due account of environmental issues in its management decisions and actions in respect of:

- The acquisition and disposal of land (including assessment of any potential land contamination);
- Building to design specifications and effective engineering solutions;
- Company vehicles, mobile site plant and other mechanical equipment procurement and maintenance;
- All site construction activities;
- The minimisation and control of harmful emissions to air;
- The control of any discharge of any pollutant to natural watercourses, surface waters, groundwater and sewerage or drainage systems;
- The minimisation and control of nuisance site noise, vibration, dust and the transference of mud from site onto roads, as a result of our site activities;
- The minimisation, re-use, recycling and disposal of waste materials;
- Energy efficiency and other resource utilisation.

The Company also recognises the importance of an effective management system in order to facilitate these environmental commitments. It will develop and maintain the necessary arrangements in order to:

- Comply with all relevant environmental legislation;
- Continually seek to improve its performance by planning, setting and monitoring its performance objectives;
- Develop, implement and continually monitor its current procedures, safe systems of work and other arrangements with regard to environmental control and risk management;
- Provide appropriate information, instruction, training and supervision to employees to enable them to competently discharge their duties and responsibilities;
- Encourage its sub-contractors and suppliers to improve their own environmental performance;
- Work with ecologists and other environmental specialists in order to ensure that it constructs its developments in line with their instructions or limitations with regard to flora, fauna and natural habitats;
- Minimise pollution and causation of nuisance to its neighbours and the general public;
- Encourage the efficient use of materials and resources and promote the use of sustainable materials to reduce its overall carbon footprint;
- Minimise the need for unnecessary work-related travel;
- Communicate where necessary with sub-contractors and suppliers on environmental issues;
- Monitor work activities that affect the environment and investigate any environmental incidents which may have a negative impact on the environment;
- Review its environmental performance on a regular basis at the very least, annually.

To fulfil these commitments and its legal obligations, the Company anticipates and expects the co-operation and commitment of all its employees at all levels within the organisation through:

- Compliance with environmental procedures, arrangements and instructions given;
- Being aware that their own acts or omissions can have a negative or detrimental impact on the environment and that the Company will take all reasonable measures to prevent or minimise any such impact;

This policy will be reviewed annually to take into account any changes in operational procedures, best practice, or changes to its legal duties and requirements.



Mr G S Higgins
Managing Director

February 2021

SECTION II

1.0 ARRANGEMENTS

Introduction

This section describes how the objectives set out in this Policy are to be achieved.

Legislation

Legislation currently in operation must be observed; the list below states some, but not necessarily all of the relevant legislation to conform to:

- Environmental Protection Act:
 - Part 2 – Waste Duty Of Care
 - Part 3 – Statutory Nuisance (Noise, Dust etc)
- Clean Air Acts
- Control Of Pollution (Oil Storage) Regulations
- Controlled Waste Regulations
- Contaminated Land Regulations
- Finance Act
- Hazardous Waste Regulations
- Groundwater Regulations
- Trade Effluent Regulations
- Waste Electrical and Electronic Equipment Regulations
- Waste Management Licensing Regulations
- Water Industry Acts
- Water Resources Acts

Objectives and Targets

Environmental objectives for the construction phase will be developed and should refer to legal compliance and environmental good practice, these will include:

- Zero pollution incidents;
- Minimisation of waste sent to landfill;
- Minimisation of disruption to residents (and therefore complaints);
- Keep airborne nuisance dust to a minimum through regular 'damping down';
- Keep and maintain public roads in a clean and tidy condition using roadsweepers;
- Protect and where possible enhance biodiversity;

Procedures for monitoring construction processes against the project environmental objectives will be undertaken by William Davis Ltd

Training Awareness and Competence

Site staff shall be competent to perform tasks that have the potential to cause a significant environmental impact. Competence is defined in terms of appropriate education, training and experience. Project specific training is required.

Environmental awareness and training shall be achieved through:

- Site induction, including relevant environmental issues;
- Environmental posters and site notices;

- Method statement and risk assessment briefings;
- Toolbox talks, including instruction on incident response procedures;
- Key project specific environmental issues briefings;
- All managers and supervisors will be briefed on the CEMP;

Managing Environment: – Risk Assessment: (Aspects & Impacts)

The identification of hazards and the assessment of risks is a key part of this Company's policy for Environment. Risk Assessment (Aspects & Impacts) will be carried out on an ongoing basis and to be effective it is essential that all employees co-operate wherever they can in the risk assessment process.

Management will ensure that the results of risk assessments (aspects & impacts), and in particular, the measures necessary to ensure environmental health and safety is communicated verbally to all employees and signatures obtained to confirm understanding.

A schedule of potential significant environmental effects relating to each activity will be developed by William Davis Ltd. This forms our Environmental Risk Assessment

Environmental Reviews

Environmental information and policy matters will be incorporated in the proceedings of the Health and Safety Committee at their regular meetings. The committee will review Corporate Health, Safety and Environmental Performance to ensure that an Effective Company Policy is maintained.

Environmental Inspection and Environmental Incident Reporting Procedures

The Health & Safety Manager will make routine inspections of the site to monitor working practices and report on site findings. He will also advise the Site Manager and Operatives of any environmental issues as they arise. As well as monitoring work in progress they will be concerned with work to be completed in the immediate future, discussing with the Site Manager the items that should be included in the risk assessment, and what job planning has been carried out.

On completion of the visit a written report will be produced, and the findings will be discussed with the Site Manager who will sign a copy of the Report.

If on a subsequent visit the Health & Safety Manager is of the opinion that adequate action has not been, and will not be taken, he must inform the Production Director as quickly as possible.

If the Health & Safety Manager is of the opinion that an operation constitutes a serious environmental risk then he will take whatever action he feels necessary, which may include the suspension of operations.

All environmental incidents and near misses must be recorded and reported to the Health & Safety Manager. Note It is a requirement that all incidents be investigated to ascertain the cause and to prevent a re-occurrence. Details of the investigation will be recorded along with all other relevant information including photographs, witness statements, statutory documents etc.

Waste Management

All waste management will be in accordance with Section 33 and 34 of the Environmental Protection Act. Removal of waste will be by Registered Carriers to a Registered Tip, Registered Broker or a site with a current U1 exemption able to accept that type of waste.

Waste transfer notes will be in place for all waste movements and consignment notes for hazardous wastes.

All waste storages should be suitable to ensure the non escape of waste and clearly identified. When dealing with waste, the Company will apply the waste hierarchy, re-using and recycling waste where possible and ultimately reducing waste sent to landfill.

Waste – Site Responsibilities

It is the policy of the Company to comply with all waste legislation. When dealing with waste, the Company will apply the waste hierarchy, re-using and recycling waste where possible and ultimately reducing waste sent to landfill. The Company is also committed to ensuring site tidiness and that resulting litter is kept to a minimum.

The Removal of Waste from Site

The removal of waste from site can only be entrusted to a Registered Carrier who holds a current registration certificate to carry that type of waste.

The Site Manager/Company must have on file an official copy of the Carrier's certificate prior to engaging the Carrier.

The waste must go to a Registered Tip, a Registered Broker or a location that has a current U1 exemption capable of taking the type of waste material to be disposed of. Once again the Site Manager/Company must have on file a copy of the current Waste Management Licence or U1 Exemption before any movement of material takes place.

Records of all Waste Management Licences and U1 Exemptions must be kept for at least two years and we must be able to produce them on demand to the Environmental Regulator or Local Council, or you/the Company could be fined.

Waste Transfer Note (WTN)

Site Managers must ensure that records of all loads passed to others are recorded in writing using a Duty of Care waste transfer note. This will include a detailed description of the waste using a code number.

You may be able to use a "Season ticket" if you have regular collections of waste of the same type by a Waste Carrier. This is one transfer note covering a series of transfers over a year.

A Waste Transfer Note will give a description of our waste to the Carriers and Disposers so they are aware of what they are handling. They also ensure a clear audit trail for the waste from when it is produced until it is disposed of. A Waste Transfer Note must be completed and signed by both the person sending the waste and the person collecting it.

Site Managers/the Company must keep the Waste Transfer Note for at least two years and be able to produce them on demand to the Environmental Regulator or Local Council, or you/the Company could be fined.

Pre-Treat Waste for Landfill

Where possible Site Managers must ensure that waste is segregated on site and be securely and safely contained so that paper or plastic for example does not blow around the site.

Hazardous Waste – Empty pressurised gas canister, paint or glue tins, aerosol cans, Paslode gas cartridges, batteries and Plasterboard waste are stored and disposed of correctly.

Segregation can be achieved by the use of individual skips for each type of waste. The skips should be clearly labelled as to the intended contents, such as wood, plastic, paper/cardboard etc. Where large amounts of waste such as topsoil, sub-soil or crushed concrete etc occur each must be kept separate from the other whilst on site and during transport to the place of disposal.

Should an analysis of waste be required to confirm its status within the Waste Regulations, samples should be obtained and taken to an appropriate laboratory for testing.

General Guidance

The question may sometimes arise as to whether topsoil may be taken from a site under our control and deposited on another site under our control without following the normal routine of disposing of waste. In such cases the first essential is to make sure that the material is not contaminated, and a test may be required to establish this.

In this case the Development Director should be contacted as it may be necessary to clear the action with the Environment Agency. In such a case it is likely that the topsoil would not be regarded as waste, but where we are disposing of topsoil to a third party, the Act would regard it as waste.

2.0 NOISE, VIBRATION & AIRBORNE DUST

Noise

William Davis Ltd will risk assess, manage, control and monitor noise, vibration and airborne dust levels on site in relation to its site activities. Noise and vibration will be controlled and limited so far as reasonably practicable so that sensitive receptors are protected from excessive noise and vibration arising from our construction activities. Certain activities may extend outside normal working hours to enable safe working or as a result of unforeseen events. Where applicable, the Local Authority Environmental Health department will be contacted to agree the activities required.

Liaison with Local Residents or other Stakeholders

William Davis understands the importance of excellent communication with local residents and other stakeholders who may be adversely affected by construction works. Good residential stakeholder relations are often the most effective way to manage potential noise impacts on site, therefore, William Davis will keep local residents and stakeholders informed of the progress of the works, including when and where the noisiest activities will be taking place and how long they are expected to last. All noise complaints will be effectively recorded, investigated and addressed.

Noise – Good Working Practices

Before any works on site commence, the site workforce will be fully briefed through a site specific induction carried out by the site manager on the need to keep the levels of noise generated on site to a minimum. Shouting and raised voices are not permitted other than in cases where warnings of danger must be given. Radios are not to be played at a volume level that is likely to disturb local residents.

Car and van drivers are not to rev their engines or use their horns, scaffolders are not to use their impact wrenches on scaffold couplers.

Noise – Plant & Equipment

The principles of Best Practicable Means will be employed to minimise noise levels during construction. Recommendations for the control of noise and vibration on construction sites are set out in BS 5228. The following measures will be used where appropriate:

- Hydraulic plant will be used in preference to pneumatic plant where possible.
- Plant and equipment will be maintained in good working order and fitted with silencers and acoustic panels where appropriate.
- All plant will be shut down or throttled back between periods of use.
- Methods used for concrete breaking and demolition should be carefully considered, non-percussive means should be used where possible.
- In sensitive locations, acoustic enclosures may be required for fixed plant such as generators.

In addition to the above, William Davis will consider general good working practices including:

- Noisy plant or equipment is to be sited as far away as is practicable from residential properties. The use of barriers such as built up earth bunds, site accommodation and fencing to deflect noise is to be employed wherever practicable.

- Wherever possible, plant and equipment is to be powered by mains electricity in preference to locally powered sources, such as diesel generators.
- All vehicles and plant should be fitted with effective exhaust silencers which should be maintained in good and efficient working order. All generators should be 'sound reduced' models fitted with properly lined and sealed acoustic covers which should be kept closed whenever the machines are in use.
- All ancillary pneumatic percussive tools should be fitted with mufflers or suppressors as recommended by the manufacturers which should be kept in a good state of repair.
- Machines in intermittent use should be shut down when not in use or where this is impracticable, throttled down to a minimum.
- The permanent site compound and static machines will be sited as far as is practicable from noise sensitive residential buildings.
- Where practicable, plant with directional noise characteristics should be orientated to minimise noise at nearby properties. Cement mixers will not be cleaned by hammering the drums.
- When handling materials, care should be shown not to drop materials from excessive heights. Even with appropriate mitigation in place it may not be possible to eliminate all noise impacts. However, best practice, considerate working hours as outlined above as well as frequent and open communications with residents will help to reduce the residual impact of construction noise.

Construction Noise

Noise levels generated during the working day are estimated to be 65-79dBA which is under the threshold for safe working under the Noise at Work Regulations 1989.

The following construction activities are anticipated to be carried out on this development:

- Earthworks and road building to extend and connect to the existing public road;
- Construction of new site roads to feed the new properties which will form the bulk of the construction works for this development. All works will take place during the day time only in line with the agreed site working hours.
- 'Stihl' type petrol driven cut-off saws will be used at various stages throughout the construction of the development. Where possible all cutting of materials using this type of saw (abrasive wheel) will be contained within an area designated for this use. When this is not possible then every effort will be made to reduce the dust produced by using water fed saws or by the use of water sprays.

An indicative construction programme and duration of works has been established for the duration of the works. Furthermore, it is also assumed that all of the plant required for an activity would be operating simultaneously in the same location.

Construction Vibration

Construction vibration may be a key subject of complaint where construction works take place close to existing residential areas. However, it is not anticipated that Vibration levels will be excessive as there are no high vibration activities taking place such as piling.

The main vibration impacts that could arise on the development could be ground compaction from the vibrating roller compactor but these activities would only be short term for a couple of hours when road bases are being compacted – these activities would only take place at least 20m to 30m from any existing residential property.

However, it is likely that vibration of this level in residential environments will cause complaint, but can be tolerated if prior warning and explanation is given to residents.

Airborne Dust and Dust Pollution

Airborne Dust may be a key subject of complaint where construction works take place close to existing residential areas. Plant types, construction methods and airborne dust mitigation measures are likely to be subject to Section 61 consent, under the Control of Pollution Act which is granted by the local authority. Close liaison with the local authority environmental health team is likely to be necessary to develop mitigation measures and close out complaints.

It is likely that the William Davis development will have the potential to generate dust from, earthworks, construction and plant and traffic movements on site especially in the hot dry summer months when lack of moisture in the ground is a key factor for nuisance dust to be generated. To mitigate the levels of dust on site, water suppression means will be employed.

- During the working day when plant movements, vehicle deliveries, earthworks and bulk muck shift activities create airborne dust collective water suppression techniques such as regular damping down with IBS Water Cubes or tow along Water Bowsers and water spraying may have to be employed to keep dust levels to a minimum.
- Road sweeps with water sprinkler suppression will be undertaken when plant and traffic movements generate significant levels of nuisance dust. Dependant on assessed risk, the use of 'jet washer' wheel cleaning facilities may be necessary.
- Protection of operatives from respirable silica has been risk assessed and measures taken to prevent dust inhalation. No operative will be permitted to 'Dry Cut' any concrete, stone or brick. Full PPE will be required including an FFP3 dust mask or respirator. The use of petrol cut-off saws such as Stihl saw will only be permitted with the use of a water suppression system
- Deliveries of stone and aggregate to site and removal of soils and excavated materials away from site will only be carried out on fully sheeted lorries.
- Rubbish and waste materials will be regularly removed from site in covered skip lorries.

Wheel Washing Facilities

Provision of wheel washing facilities will be considered on sites where necessary. Where the transfer of site generated mud is likely wheel washing facilities will be provided at the site entrance and exit. This will take the form of a manned jet washer and water bowser. This facility is only anticipated to be necessary in the early days of the site before new site roads can be surfaced with tarmac. Run-off water will be controlled so that it does not enter surface water gulleys and drains.

3.0 POLLUTION CONTROL

General

An 'environmental incident' is defined as any unwanted, unplanned event, activity or condition that causes, or has the potential to cause harm to people, or damage to property or the environment. 'Pollution' is defined as any harmful impact on the local atmospheric, aquatic or land environment caused by release of hazardous or nuisance-causing substances or excessive noise and vibration.

Pollution Prevention

Potential pollutants from the works may include:

- Silt and sedimentation run-off to watercourses.
- Cement and concrete run-off water.

- Oils and fuels
- Waste materials
- Effluent or waste water from site accommodation.

Light Pollution

Site lighting should be positioned and directed so as not to intrude unnecessarily on adjacent residential properties. Welfare and washing facilities will be provided on site and be maintained to the highest possible hygiene standards.

Air Pollution

William Davis will comply with the regulations introduced under The Clean Air Act 1963. The burning of materials on site is **NOT** permitted; this includes fires set to heat up and burn-off tarmacadam build up on shovels and rakes.

Fuel and Oil Handling

All fuel and oil will be stored in accordance with the Control of Pollution (Oil Storage) (England) Regulations 2001 and they will be handled in such a way that risk of pollution is minimised, this will include:

- Fuel and oil storage tanks will comply with the Control of Pollution (Oil Storage) (England) Regulations 2001 and will be locked when not in use.
- Storage areas will not be located within 10m of the watercourse or highway gully.
- Mobile bowsers will be bunded and will comply with the Control of Pollution (Oil Storage) (England) Regulations 2001 and will be locked when not in use.
- Fuel bowsers must be locked at all times when not in use and placed on an impermeable surface.
- Drums will be stored in bunded areas with a minimum capacity of 25% of the total volume contained within the bund, or 110% of the largest container, whichever is greater.
- Drums will be maintained in good condition, fitted with lids and labelled to indicate the contents.
- Trained operatives only will carry out refuelling of plant and equipment.
- Static combustion engine plant (e.g. compressors, lighting sets) will be integrally bunded or placed on drip trays.
- Plant will be regularly checked for leaks and will be regularly maintained.
- Spill kits will be provided within close proximity to fuel and oil storage areas and operatives will be trained in their use.
- Mobile site plant is not to be deployed in the vicinity of waterways such as rivers, streams and canals. Consideration is to be given to mobile site plant accidentally going into the watercourse and losing fuel.
- L.P.G must be stored in accordance with the Company's Health and Safety Policy and kept well away from any excavation or drain.

To minimise the risk of pollution from oils on site, measures are required in relation to their storage, use and disposal. Environmentally considerate lubricants, such as synthetic, non-toxic biodegradable hydraulic fluids are available and may be used at sensitive locations.

Measures will be developed to control site runoff and prevent contamination. Account will be taken of the Environment Agency Pollution Prevention Guidelines:

- PPG 1 'General guide to the prevention of pollution'
- PPG 5 'Works and maintenance in or near water'
- PPG 6 'Working at construction and demolition sites'
- PPG 18 'Managing fire-water and major spillages'
- PPG 21 'Pollution Incident Response Planning'
- PPG 22 'Dealing with spillages on highways'

Appropriate pollution prevention measures will be identified by William Davis Ltd.

Refuelling

All fuel deliveries must be supervised at all times, ensuring there is sufficient capacity in the tank before delivery, and that the secondary containment will contain any spill. During refuelling, spill kits must be present in the event of a spillage to prevent it entering drains or watercourses.

All other items of plant, such as masonry saws, generators, pumps etc must also be refuelled in the same purpose made place. When storing these items, including items of plant, drip trays should be placed underneath to contain potential leaks.

In the event of there being no fuel bowser on site, oil drums used in their place must be situated on a suitable tray or stand with a capacity of 110% of the oil drum capacity.

Maintenance of Plant

Any maintenance of plant and equipment will be carried out at least 10m away from any watercourse or drain. Spill kits will be available during all plant maintenance operations and drip trays used to contain any leakage of oil.

Any plant or equipment considered to be a pollution risk will either be repaired or removed from site. Portable Electric Generators are often used when the electric power has not yet been made to a plot. Each individual generator should have a drip tray placed beneath it to capture drips and spills during use and refuelling.

Mortar Silos

Mortar Silo and the mortar filling locations are to be regularly inspected and maintained to a high standard. Excess spoiled mortar or mortar tub knock-out waste is to be regularly cleared away. Leaking water hoses are to be repaired to prevent unclean water running off to surface water gulleys.

All Silos must be placed on a impermeable surface at least 10m away from watercourses and drains. Spill kits must be on site in the event of a spillage and where necessary, bunds must be created around the edge of the silo base to stop run off due to the mortar being "strongly alkaline" and toxic to aquatic life.

Concrete and Cement

Concrete and cement are very alkaline and can cause serious pollution. To minimise the risk of run-off entering any watercourse, concrete and cement mixing will be sited at least 10m away from any watercourse and plant cleaned within designated washout areas. Wash water from concrete and cement works must never be discharged into a watercourse.

Concrete Washout

A designated concrete washout area will be provided for washing out concrete delivery lorries, concrete pumps and grout lines. This will consist of a small skip lined with an impermeable membrane or similar arrangement.

In line with the Environmental Agency regulatory statement for concrete wash waters all concrete washouts must be washed out in a contained area (such as impermeable lined hole, skip or other settlement tank) away from any watercourses and drains to prevent pollution.

Concrete wash out water is alkaline and contains high levels of chromium. If not controlled this can contaminate ground water, but also migrate to storm drains and effect aquatic life by altering the pH of the water. Incorrect washout could also lead to the clogging up of drains and increasing the risk of flooding.

Plaster & Plasterers Waste

Plaster like cement is very alkaline and can cause serious pollution. To minimise the risk of run-off entering any watercourse, plasterers are not to tip washout water down surface water gulleys or into the ground. They should carefully dispose of plaster waste and sediments to site skips where sediment can be trapped

Watercourses, Drainage and Pollution

Precautions will be taken prior to and during construction to ensure the protection of watercourses and groundwater against pollution. The measures will be assessed through site investigation and also by consulting CIRIA Report 532 'Control of Water Pollution from Construction Sites' and Environment Agency Pollution Prevention Guidelines, principally PPG6 – 'Working at Construction and Demolition Sites'.

Surface Water Run-off

Solids from surface runoff water will be managed so that silty site water is captured and does not enter surface gulleys or any natural watercourse within or adjacent the development. Specialist groundwork contractors will utilise suitable and effective surface water gully guards (as detailed below) and protection to prevent pollution entering road gullies.

- a. As a priority, from the commencement of the development specialist groundwork subcontractors will form the roads & sewers and balancing pond areas to create an outfall.
- b. Wherever possible natural run off across site existing grassed areas will be maintained by limiting topsoil strip to agreed phases of build release.
- c. Where the gradient of site is severe a topsoil bund will be created to attenuate surface water run-off.

Silt Controls

During the period of construction phase Geotextile material such as 'Terram' or heavy duty nylon filled polystyrene sacks known as 'Gulley Bags' will be fitted to all road gullies to intercept and filter run off from the road. These will be inspected and maintained on a weekly basis and emptied as and when required, where necessary damaged, worn out or perished gulley bags will be repaired or replaced.

Straw bales will be placed at the entrance and outfall to the headwalls serving the balancing pond to stop silt entering the watercourse. Alternatively and if required; gabion stone cages wrapped in terram could be used at headwall entrance and outfall.

Silt & Sediment Barriers

The installation of silt barriers at strategic locations along the boundary of the site, or along the banks of swales or drainage embankments, attenuation basins, surface watercourses or ditches shall be considered.

Control of Sedimentation

Natural, local materials can present a pollution risk in some contexts. Disturbance and handling of soils, particularly in wet weather, can lead to particles being carried by running water into watercourses causing sedimentation. Measures to minimise the risk may include good soils management (see 5.12) as well as:

- Locating activities likely to give rise to sediment away from watercourses.
- Ensuring vegetated areas are set aside to act as buffer zones along the top of each bank of a watercourse.
- The provision of silt fencing to remove suspended particles from running water.

- Settlement tanks or lagoons or the use of flocculants to treat water containing suspended particles prior to its release to any water body.
- Inspection of outfalls to be undertaken by William Davis Ltd during site Health, Safety and Environment Inspections

Notification Procedure

Procedures for reporting any spillages or pollution incidents are to be clearly set out. The procedure will include recording all incidents in the project progress report and providing details to the contract manager and health & safety manager as soon as they happen.

Contact details for key site and emergency response personnel with responsibilities relating to the protection of the environment will be kept in the site office. The Environment Agency can be contacted by telephoning 0800 80 70 60 to resolve an issue there and then.

Earthworks Strategy

An earthworks strategy to provide for the management and protection of soils on sites will be implemented. A specialist groundwork contractor will be employed to put into place such measures to manage soils on site. No excessive topsoil strips shall be undertaken too early in the development. Virgin ground where applicable, will be left untouched.

The location of spoil bunds on site will be carefully considered before being created and will be seeded to prevent soil being blown away through wind erosion which could cause a nuisance to neighbouring properties.

Construction Environmental Management Plan (CEMP)

A site specific Construction Environmental Management Plan (CEMP), will be produced for each of our developments prior to commencement on site. It will remain a live document for the duration of the development. The CEMP is a plan and tool which is intended to avoid, minimise or mitigate any adverse construction effects on the environment and surrounding community.

The CEMP will be developed to provide the management framework needed for the planning and implementation of construction activities in accordance with environmental commitments identified in the William Davis Ltd Environment Policy and environmental site procedures. It will also be in line with all current environmental legislative requirements.

The purpose of the CEMP is to:

- Identify stakeholder requirements.
- Set out the Environmental Management System requirements (in line with ISO 14001 standards).
- Ensure compliance with current legislation.
- Effectively minimise any potential adverse environmental effects during construction of the project or development including how site specific method statements will be developed to avoid, minimise and mitigate construction effects on the environment.
- Translate committed mitigation or controls, set out in the William Davis Environment Policy into committed site procedures.

The CEMP will be drafted during the planning/outline design phase to ensure that the necessary measures become incorporated as the project progresses. Prior to construction, the CEMP may be revised to address all construction issues and ensure that any residual effects following the design process are mitigated as far as reasonably practicable.

There may be protected ecological or heritage issues or constraints identified in planning that need to be considered with regard to the development such as:

- Vegetation clearance and topsoil stripping.
- Site establishment.
- Earthworks construction, including movement of materials.
- Construction of highway, including roundabouts and junctions.
- Tying in the new road to the existing road junction.
- Construction of new houses.

Working hours at each development will be stated after agreement with the relevant local authority.

Complaints and Enquiries

All complaints or information requests are to be directed to the William Davis Contract Manager from a site level. Any complaints received are to be logged promptly so they can be dealt with and closed out, whether that be on site at the time of the complaint arising or through necessary additional communication or action undertaken away from site.

Site staff and operatives will understand the chain of command when a complaint is made and any complaint received in relation to noise, vibration and airborne dust pollution will be investigated by the Site Manager and Health & Safety Manager. Records of any complaints about noise, vibration and airborne dust pollution received by and relating to site will be recorded and retained. Pertinent information that will be required is as follows:

- Name of complainant;
- Address of affected property;
- Contact phone number;
- Date and time of complaint;
- Type of complaint (noise, vibration, airborne dust pollution)
- Details of complaint;

Once investigated, any preliminary or final reports into the complaint should be forwarded to the Local Authority and should include such information as follows:

- Person responsible;
- Job title;
- Findings of investigation;
- Action taken;
- Details of response to complainant;
- Action to prevent recurrence;
- Details of any further action required;

Noise, dust and vibration may be a key subject of complaint where construction works take place close to existing residential areas. Working hours, plant types, construction methods and mitigation measures will be risk assessed and controlled on site. Close liaison with the local authority environmental health team is likely to be necessary to develop mitigation measures. Close liaison with the local authority environmental health team or planning enforcement officer is likely to be necessary to develop mitigation measures and close out complaints.

Where applicable, liaison will also be undertaken with local councillors, planning enforcement and town/parish councils as representatives of the local community to discuss and address any issues.

The local authority environmental health team may sometimes be the first to be contacted by residents affected by noise and will require to be kept apprised of progress, programme and upcoming phases of works that may give rise to disturbance in order that they can respond to complainants.

Careful monitoring of complaints received, including recording details of the location of the affected party, time of the disturbance and nature of the noise can assist with managing the works to reduce the likelihood of further complaint.

The passing on of the site managers or where applicable, the groundworkers mobile phone contact details can help in resolving these issues and will hopefully prevent further calls to the local authority. A direct call can sometimes

SECTION III

4.0 DUTIES AND RESPONSIBILITIES

Managing Director

The ultimate responsibility for the Policy rests with the Managing Director.

The implementation and enforcement of the Environmental Policy is the responsibility of all Directors and through them to their Line Managers. Their duties and responsibilities are set out in detail in the following sections.

The Managing Director shall:

- Ensure that adequate financial, manpower or other resources are made available to enable the commitments made in the policy to be achieved.

Company Directors

Directors are responsible for the overall effectiveness of the Company Environmental Policy within their area of responsibility and will ensure that the Policy is rigorously applied. To that end they will ensure that adequate supervision exists, that risks are properly assessed, financially resourced and that the necessary training is undertaken by employees.

All Directors will make themselves aware of their responsibilities for the environment and will undertake such training as may be required to achieve appropriate accreditation where necessary.

5.0 PRODUCTION DEPARTMENT

Production Director

The Production Director oversees the Production, Health & Safety, M&E, Roads & Civils and Security Departments. In addition to the Company Directors responsibilities, the Production Director shall:

- Ensure Departmental Managers fulfil their environmental obligations.
- Have a working knowledge of the Environmental Protection Act and associated legislation as detailed in Section 3 and be familiar with the general duties imposed by that legislation.
- Ensure that all environmental requirements are complied with. Liaise with the Site Manager on environmental matters when visiting sites, and record in writing, any significant variations from good practice and the action to be taken to rectify them.

Operations Manager

It is the responsibility of the Operation Manager to ensure that work is carried out in accordance with the principles and objectives of the Policy. The Operations Manager shall:

- Ensure the Contracts Managers fulfil their environmental obligations.
- Ensure Site Managers fulfil their environmental obligations.
- Have a working knowledge of the Environmental Protection Act and associated legislation as detailed in Section 3 and be familiar with the general duties imposed by that legislation.
- Ensure that all environmental requirements are complied with.
- Liaise with the Site Manager on any site on environmental matters when visiting sites.

Contract Managers

It is the responsibility of the Contract Managers to ensure that work is carried out in accordance with the principles and objectives of the Policy. The Contract Managers shall:

- Ensure Site Managers fulfil their environmental obligations.
- Have a working knowledge of the Environmental Protection Act and associated legislation as detailed in Section 3 and be familiar with the general duties imposed by that legislation.
- Ensure that all environmental requirements are complied with. Liaise with the Site Manager on environmental matters when visiting sites, and record in writing, any significant variations from good practice and the action to be taken to rectify them.
- Ensure site visits to final waste destinations are carried out and recorded to ensure site waste is not being illegally treated.
- Ensure that the Site Waste Management Plan is completed accurately and on site before construction work commences and that it is updated and reviewed regularly.
- Continually assess the environmental training needs of Staff and Operatives under their control and communicate these to the HR Manager, releasing Operatives where necessary for relevant training.

Health and Safety Manager & Health & Safety Assistant

It is the responsibility of the Health & Safety Manager with the help of the Health & Safety Assistant to ensure that work is carried out in accordance with the principles and objectives of the Policy. They shall:

- Advise on all aspects of the environment.
- Have a working knowledge of the Environmental Protection Act and associated legislation as detailed in Section 3 and be familiar with the general duties imposed by that legislation.
- Monitor implementation of the policy to ensure that all works, sites, etc. are conversant with existing legal requirements, inspect and submit written reports on all findings and submit to Management for action, monitoring the resolution of these actions.
- Investigate all environmental incidents, prepare a report and recommendations.
- Investigate Environmental Agency & Local Authority enforcement notices, complaints, and advise on any corrective action necessary.
- Inform the Board on the Company performance on environment, any impending legislation, codes of practice and other matters published on environment and matters requiring urgent action relating to the Company's activities.
- Liaise with members of the Environment Agency or Local Authority.

- Advise the HR Manager of training needs and participate in the training activities as may be directed.
- Support and give guidance to site staff to ensure that acceptable standards of environmental compliance are maintained.

Site Managers/Site Supervisors

It is the responsibility of Site Managers/Site Supervisors to ensure that work is carried out in accordance with the principles and objectives of the Policy. They shall:

- Ensure that all personnel under their control have access to a copy of this policy and carry out their duties as required by the Company's Environmental Policy.
- Have a working knowledge of the Environmental Protection Act and associated legislation as detailed in Section 3 and be familiar with the general duties imposed by that legislation.
- Ensure in good time, that approved Method Statements/Risk Assessments relating to environmental matters are on site prior to starting work.
- Ensure the site is secured each night to prevent illegal fly-tipping and the escape of waste.
- Ensure the site takes care to avoid contaminating groundwater.
- Ensure waste transfer notes are completed and kept on site, with a copy going to the office for storage for 2 years (consignment notes 3 years).
- Follow the waste hierarchy of reduce, re-use, recycle, recover and dispose, segregating all waste and minimising hazardous waste where possible.
- Ensure that the Site Waste Management Plan is communicated to Site Operatives and is followed at all times including subcontractors.
- As far as is reasonably practicable, eliminate from works under their control any risks to the environment. i.e. carry out risk assessments for all significant hazards and that any precautions/control measures specified are communicated to Operatives and implemented.
- Report all environmental incidents, near misses and EA visits that occur on site to the Health and Safety Department.
- Ensure that Utility Companies fulfil their environmental obligations in line with our policies. They shall liaise with the Contracts Managers and Health & Safety Manager to ensure that environmental obligations are met.
- Deliver Tool Box talks relevant to environmental and sustainability issues.

Manager for M & E Department

It is the responsibility of the Manager for M & E Department, or in his absence his deputy, to ensure that work is carried out in accordance with the principles and objectives of the Policy. The Manager shall:

- Ensure the Plumbing Manager/Electrical Supervisor fulfil their environmental obligations.
- Continually assess the training needs of staff and operatives under their control and communicate these to the HR Manager, releasing operatives where necessary for relevant training

Plumbing Manager/Electrical Supervisor

It is the responsibility of the Plumbing Manager/Electrical Supervisor to ensure that work is carried out in accordance with the principles and objectives of the Policy. In addition to the Plumbing Manager/Electrical Supervisor responsibilities, they shall:

- Ensure that all environmental requirements are complied with. Liaise with the Site Manager on environmental matters when visiting sites, and record in writing, any significant variations from good practice and the action to be taken to rectify them.
- Have a working knowledge of the Environmental Protection Act and associated legislation as detailed in Section 3 and be familiar with the general duties imposed by that legislation.
- Ensure in good time, that approved Method Statements/Risk Assessments relating to environmental matters are on site prior to starting work.
- When designing M & E designs, consider water and energy efficient appliances and fittings.

Roads & Civils Manager

It is the responsibility of the Roads & Civils Manager, or in his absence the Groundworks & Roads Supervisor, to ensure that work is carried out in accordance with the principles and objectives of the Policy. In addition to the Groundworks & Roads Supervisor responsibilities, the Roads & Civils Manager shall:

- When visiting sites ensure that all environmental requirements are complied with. Liaise with the Site Manager on environmental matters, and record in writing, any significant unsafe practices observed relating to the sites activities and the action to be taken to rectify them.
- Ensure drains are correctly identified and easily distinguishable between surface water and foul prior to dewatering excavations, ensuring that water quality discharge consents are in place where required.

Groundworks & Roads Supervisor

It is the responsibility of the Groundworks & Roads Supervisor to ensure that work is carried out in accordance with the principles and objectives of the Policy. They shall:

- Ensure that all personnel under their control have access to a copy of this policy, work in a safe manner and carry out their duties as required by the Company's Environmental Policy.
- Have a working knowledge of the Environmental Protection Act and associated legislation as detailed in Section 3 and be familiar with the general duties imposed by that legislation.
- Ensure that all environmental requirements are complied with. Liaise with the Site Manager on environmental matters when visiting sites, and record in writing, any significant variations from good practice and the action to be taken to rectify them.
- Ensure site visits to final waste destinations are carried out and recorded to ensure site waste is not being illegally treated.
- Appoint competent contractors, ensuring that relevant licenses including Waste Carriers Certificate and Waste Management Licence (or paragraph 19 exemption) are in date and lawful and that copies are kept on site.
- Ensure in good time, that approved Method Statements/Risk Assessments relating to environmental matters are on site prior to starting work.
- As far as is reasonably practicable, eliminate from works under their control any risks to the environment. i.e. carry out risk assessments for all significant hazards and that any precautions/control measures specified are communicated to operatives and implemented.
- Report all environmental incidents, near misses and EA visits that occur on site to the Health and Safety Manager.
- Deliver Tool Box talks relevant to environmental and sustainability issues.

Plant & Training Manager

It is the responsibility of the Plant & Training Manager, to ensure that work is carried out in accordance with the principles and objectives of the Policy and oversees the Plant & Training Department which includes the Plant Yard, Plant Workshop and Beacon Road Site. The Plant & Training Manager shall:

- Monitor developments in environmental legislation and recognised good practice, assess their relevance to the company's activities, develop and communicate appropriate responses as necessary.
- Continually assess the environmental training needs of Staff and Operatives under their control and communicate these to the HR Manager, releasing Operatives where necessary for relevant training.
- Ensure that where required, the Company is registered as a waste carrier.
- Ensure that all personnel under their control have access to a copy of this policy, work in a safe manner and carry out their duties as required by the Company's Environmental Policy.
- Have a working knowledge of the Environmental Protection Act and associated legislation as detailed in Section 3 and be familiar with the general duties imposed by that legislation.
- Ensure that all environmental requirements are complied with. Liaise with the Site Manager on environmental matters when visiting sites, and record in writing, any significant variations from good practice and the action to be taken to rectify them.
- As far as is reasonably practicable, eliminate from works under their control any risks to the environment. i.e. carry out risk assessments for all significant hazards and that any precautions/control measures specified are communicated to operatives and implemented.

Garage Manager/Plant Controller

It is the responsibility of the Garage Manager/Plant Controller to ensure that work is carried out in accordance with the principles and objectives of the Policy. They shall:

- Ensure that all personnel under their control have access to a copy of this policy, work in a safe manner and carry out their duties as required by the Company's Environmental Policy.
- Have a working knowledge of the Environmental Protection Act and associated legislation as detailed in Section 3 and be familiar with the general duties imposed by that legislation.
- Ensure in good time, that approved Method Statements/Risk Assessments relating to environmental matters are on site prior to starting work.
- As far as is reasonably practicable, eliminate from works under their control any risks to the environment. i.e. carry out risk assessments for all significant hazards and that any precautions/control measures specified are communicated to Operatives and implemented.
- Report all environmental incidents, near misses and EA visits that occur on site to the Health and Safety Department.
- Deliver Tool Box talks relevant to environmental and sustainability issues.
- Ensure that any new plant or equipment hired meets the requirements of environmental legislation.

Yard Manager/Yard Operatives

It is the responsibility of the Yard Manager to ensure that work is carried out in accordance with the principles and objectives of the Policy. They shall:

- Observe all environmental rules and conform to instructions given by the Health and Safety Manager in respect of methods of working at all times, so as to comply with our Policy.
- Report all accidents, damage to Company property or near misses to the Production Director or Health and Safety Manager, whether persons are injured or not.
- Ensure the Yard Operatives fulfil their environmental obligations.

Security Manager

- Ensure that the Security Staff and Cleaners fulfil their environmental obligations.
- Observe all environmental rules and conform to instructions given by the Health and Safety Manager in respect of methods of working at all times, so as to comply with our Policy.
- Report all accidents, damage to Company property or near misses to the Health and Safety Manager and/or Site Manager, whether persons are injured or not.

Security Staff

- Observe all environmental rules and conform to instructions given by the Health and Safety Manager in respect of methods of working at all times, so as to comply with our Policy.
- Report all accidents, damage to Company property or near misses to the Security Manager, Health and Safety Manager or Site Manager, whether persons are injured or not.

Cleaners

- Observe all environmental rules and conform to instructions given by the Health and Safety Manager in respect of methods of working at all times, so as to comply with our Policy.
- Report all accidents, damage to Company property or near misses to the Security Manager, Health and Safety Manager or Site Manager, whether persons are injured or not.

6.0 COMMERCIAL DEPARTMENT

Commercial Director

In addition to the Company Directors responsibilities the Commercial Director shall:

- Ensure that the Development Manager, Senior Quantity Surveyors, Quantity Surveyors, Assistant Quantity Surveyors, Chief Buyer and Buyers fulfil their environmental obligations.
- Ensure that they appoint competent external designers and that their designs have considered the environment.

Ensure that environment is considered when developing design within the Private Housing Department, ensuring that regulation 11 of the CDM Regulations 2015 are adhered to.

Chief Surveyor

It is the responsibility of the Chief Surveyor to ensure that work is carried out in accordance with the principles and objectives of the Policy. In addition they shall:

- Ensure the Senior Quantity Surveyors/Quantity Surveyors & Assistant Quantity Surveyors fulfil their environmental obligations.

Bonus Manager

It is the responsibility of the Bonus Manager to ensure that work is carried out in accordance with the principles and objectives of the Policy. In addition they shall:

- Ensure the Bonus Surveyors fulfil their environmental obligations.

Senior Quantity Surveyors/Quantity Surveyors/Assistant Quantity Surveyors/Bonus Surveyor

It is the responsibility of the Senior Quantity Surveyors/Quantity Surveyors, Assistant Quantity Surveyors, Bonus Manager and Bonus Surveyor to ensure that work is carried out in accordance with the principles and objectives of the Policy. They shall:

- Have a working knowledge of the Environmental Protection Act and associated legislation as detailed in Section 3 and be familiar with the general duties imposed by that legislation.
- Ensure that sites are registered with the Environment Agency as Hazardous Waste Producers and U1 permits are in place.
- Ensure in good time that sub-contractors are issued with all 'project relevant' environmental information.
- Ensure that the Company only uses competent sub-contractors in line with the Company's subcontractor policy (Section 1.4).

Chief Buyer

It is the responsibility of the Chief Buyer to ensure that work is carried out in accordance with the principles and objectives of the Policy. In addition they shall:

- Ensure Buyers fulfil their environmental obligations.

Buyers

It is the responsibility of the Buyers to ensure that work is carried out in accordance with the principles and objectives of the Policy. They shall:

- Ensure in good time, that all environment matters are considered when compiling tenders and where available, 'project relevant' environmental information is issued to suppliers in good time.
- Ensure that products that are "dangerous to the environment" are avoided where alternatives are available.
- Ensure that a site's supply chain has been structured to reduce its environmental impacts.

7.0 LAND AND TECHNICAL DEPARTMENT

Development Director

In addition to the Company Directors responsibilities the Development Director shall:

- Ensure that the Land Managers, Planning Manager, Senior Planners, Planners, Technical Manager, Engineering Manager, Engineering Design Coordinator, Assistant Design Coordinator, Development Manager, Development Surveyor, Estimator and Site Engineers fulfil their environmental obligations.
- Ensure that they appoint competent external designers and that their designs have considered the environment.

Ensure that all environmental matters are considered when developing design within the Private Housing Department, ensuring that Regulation 11 of the CDM Regulations is adhered to.

Senior Land Manager, Senior Strategic Land Manager, Land Buyer, Planning Manager, Senior Planners, Planner

It is the responsibility of the Senior Land Manager, Senior Strategic Land Manager, Land Buyer, Planning Manager, Senior Planners and Planner to ensure that work is carried out in accordance with the principles and objectives of the Policy. They shall:

- Ensure that contaminated land is managed in line with Environment Agency guidance CLR11 – Model Procedures for the management of land contamination and that risks have been addressed by investigating previous land use.

Technical Manager

- Observe all environmental rules and conform to instructions given by the Health and Safety Manager in respect of methods of working at all times, so as to comply with our Policy.
- Report all accidents, damage to Company property or near misses to the Health and Safety Manager, whether persons are injured or not.

Engineering Manager, Engineering Design Coordinator, Assistant Design Coordinator, Site Engineers

- Consider the management of surface water run-off and associated drainage proposals before planning sites.
- Ensure flood risks assessments have been carried out during design.

Development Manager, Development Surveyor, Estimator

It is the responsibility of the Development Manager, Development Surveyor, Estimator to ensure that work is carried out in accordance with the principles and objectives of the Policy. They shall

- Ensure that they appoint competent external designers and that their designs have considered the environment.

Ensure that all environmental matters are considered when developing design within the Private Housing Department, ensuring that regulation 11 of the CDM Regulations are adhered to.

8.0 SALES DEPARTMENT

Sales Director

In addition to the Company Directors responsibilities the Sales Director shall:

- Ensure that the Sales Managers, Marketing Manager, Sales Negotiators, Customer Care Manager and Customer Care Team fulfil their environmental obligations.
- Observe all environmental rules and conform to instructions given by the Health and Safety Manager in respect of methods of working at all times, so as to comply with our Policy.
- Report all accidents, damage to Company property or near misses to the Health and Safety Manager and/or Site Manager, whether persons are injured or not.

Senior Sales Managers/Sales Managers/Marketing Manager/Sales Negotiators

- Make themselves familiar with and conform to the Company's Environmental Policy at all times.
- Observe all environmental rules and conform to instructions given by the Health and Safety Manager in respect of methods of working at all times, so as to comply with our Policy.
- Report all accidents, damage to Company property or near misses to the Sales Director, Health and Safety Manager and/or Site Manager, whether persons are injured or not.

Head of Customer Service/Customer Care Team

- Make themselves familiar with and conform to the Company's Environmental Policy at all times.
- Observe all environmental rules and conform to instructions given by the Health and Safety Manager, Contracts Manager or Site Manager in respect of methods of working at all times, so as to comply with our Policy.
- Report all accidents, damage to Company property or near misses to the Sales Director, Health and Safety Manager and/or Site Manager, whether persons are injured or not.

9.0 MISCELLANEOUS

All Office and Administration Employees

- Make themselves familiar with and conform to the Company's Environmental Policy at all times.
- Observe all environmental procedures and conform to instructions given by the Health and Safety Manager in respect of methods of working at all times, so as to comply with our Policy.
- Report all environmental incidents or environmental near misses to the Health and Safety Manager whether persons are injured or not.

All Operatives, Visitors and Subcontractors On Site

All operatives and visitors to site shall:

- Make themselves familiar with and conform to the Company's Environmental Policy at all times.
- Observe all environmental rules and conform to instructions given by the Contracts Manager, Site Manager and Health and Safety Manager in respect of methods of working at all times.
- Report all accidents, damage to Company property or near misses to the Site Manager, whether persons are injured or not.
- Report immediately, any unsafe practices or conditions (Including defects on plant & equipment)

Where any employee considers there to be an environmental hazard in the work area or there are problems with the Company's environmental policy and procedures or would like to make a suggestion on environmental issues they should do so as soon as they can through the open door policy to the Health and Safety Manager or the H&S hotline (ext 3300 or 01509 638300).