



Newgate
Construction Ltd

Environmental Policy
2016

Environmental Statement:

Through the adoption of a reasonable and proactive attitude to environmental issues THE COMPANY is committed to minimising potentially harmful effects on the environment and to contributing to sustainable development through balancing its business aims with environmental considerations.

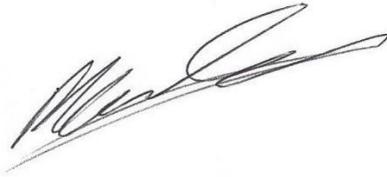
Newgate Construction Ltd will meet and where possible exceed the requirement of all applicable legislation and regulations.

Specifically, where it is within the company's control or influence in both design and construction Newgate Construction Ltd undertakes to:

- Endeavour to minimise the environmental impact of its operations and to reduce the effects of noise, dust, disturbance and inconvenience.
- Develop management processes, operational procedures, etc. to prevent pollution.
- Make efficient use of energy resources, taking appropriate opportunities to reduce waste and promote recycling and the use of recyclable materials.
- Implement a continual improvement process by assessing and monitoring its environmental performance against specific objectives and targets relevant to its business activities.
- Encourage initiatives that enhance its environmental performance.
- Work with subcontractors and suppliers to improve their environmental performance.
- Where appropriate, consult with the local community on environmental performance.
- Newgate Construction Ltd will comply with the requirements of the SWMP (2008) for all construction activities that fall within its scope.

It is the responsibility of all Newgate Construction Ltd employees to support and apply that section of the company environmental policy and procedures that relate to their activities.

Appropriate support and training will be given to staff to ensure that they are able to fulfil the commitments given in this statement of policy.



Signed:

Managing Director

Dated: January - 2016

Review Date: January - 2017

1) Introduction:

The environmental Protection Act 1990 imposes a duty of care on persons concerned with controlled waste. The duty applies to any person who produces, imports, carries, keeps, treats, or disposes of controlled waste. Breach of the duty of care is an offence, which upon conviction can lead to an unlimited fine.

Controlled waste means any waste from households, commercial or industry.

In order to comply with the duty of care, those subject to duty must try to achieve the following four criteria:

- 1) To prevent any person from disposing of, from storing or from treating controlled waste without a Waste Management License, or breaking the conditions of a license or in a manner likely to cause pollution or harm to health.
- 2) To prevent the escape of waste.
- 3) To ensure that if the waste is transferred, it does only to an "Authorised Person" or to a person for "Authorised Transport Purposes".
- 4) To ensure that a written description accompanies all waste being transferred and that the description is clear enough to enable each person receiving it to treat it in the correct manner.

It is the responsibility of each work contractor on site to ensure that their actions concerning waste are sufficient to meet the requirements of the Environmental Protection Act 1990 and the Control of Substances Hazardous to Health Regulations 2002. This document is provided for guidance and should be regarded as no more than a minimum standard to be achieved.

Work contractors are required to nominate in writing a representative on site, to be responsible for ensuring that waste concerning their operations on site is controlled in the manner specified by the Environmental Protection Act.

2) Waste Management:

Purpose:

To ensure that waste is disposed of in a controlled manner to achieve minimum environmental impact.

Controls:

Newgate Construction Ltd will nominate a person to oversee the Site Environmental Management Plan. To be referred to as the Site Waste Manager who will be responsible for the operation of the site waste management system as described in this procedure.

Newgate Construction Ltd will establish their own disposal system. The Principle Contractor will provide a number of common user waste disposal skips. The common user waste disposal skips will be for the deposit of waste collected from site operations (packaging, paper, litter and other inert products).

Special wastes such as oils, chemicals, paints and solvents etc. will be identified by the Company before commencing operation on site.

The disposal of containers and residues of any substances which falls within the scope of Control of Substances Hazardous to Health Regulations 2002 is the responsibility of the Company when brought to site.

Redundant containers need to be stored in a secure place pending removal from site. Waste safe containers or their equivalent can be used for the collection of containers, but the waste containers must be clearly labelled as to what they will take. Containers should have their tops on so as not to vent into the atmosphere.

Monitoring:

Newgate Construction Ltd will check waste skips and other receptacles on a weekly basis. If materials are not being placed in the correct receptacles the Company will investigate and take action to address the situation. A record of the checks will be kept in the Site Office for the duration of the project.

3) Fuel and Lubricants:

Purpose:

To ensure that fuel or oil does not enter water, drains, or contaminates site land or groundwater.

Controls:

Newgate Construction Ltd shall establish a designated COSHH storage area where COSHH substances will be delivered. The storage area shall have a bund sized at 110% of the storage capacity, the floors and walls shall be impervious

COSHH dispensed from a drum must be poured through a funnel or other suitable pouring device. No more than the amount required for immediate use is to be kept on site.

COSHH containers are to be kept in a bunded area to contain any spillages.

Monitoring:

The Site Manager/Agent/Foreman will check, on a regular basis that COSHH containers are not left on site after use. A record of offending containers will be kept. If fuel/oil containers are found on site, the Company will investigate.

4) Noise:

Baseline noise surveys will be initiated to establish formally acceptable noise levels for each specific site where necessary. These noise levels will be included in any formal agreements with the Local Environmental Agency, for the project if necessary.

The noise criteria will be utilised in determining the method of work, type of plant to be used and noise mitigation measures for each project.

Where appropriate the Local Authority will be informed of the works in accordance with current legislation. The application will contain particulars of works, work methods and details of the measures proposed to minimise noise nuisance resulting from the works in accordance with the current British Standard and relevant environmental legislation.

Newgate Construction Ltd will comply with the recommendations set out in the current Code of Practice for Noise Control on construction, Demolition and Open Sites, Code of Practice for basic Information and Procedures for Noise Control, and Guidance to Noise Control Legislation for Construction and Demolition.

While it is recognised that the current British Standard, Method of Rating Industrial Noise Affecting Mixed Residential and Industrial Areas, is not applicable to construction works, the philosophy of this document may be referred to an assessing degrees of nuisance.

Before commencement of works at any site, the Company will to the Local Authority the following information:

- 1) A method statement (in accordance with current British Standard), stating precisely the type of plant to be used and the proposed noise control methods.
- 2) A programme of work indicating the sound power level and location for each activity on the programme.
- 3) Documentation from manufacturers' literature establishing the sound level of plant.
- 4) Calculations of LAeq and maximum levels at specified buildings as requested by the Local Authority.

Any changes with regards to the type of plant or programme of work, the proposed alteration and information will be submitted to the Local Authority in advance for approval.

The use of any plant or equipment required for any emergency which causes a departure from the agreed site working practice shall be notified to the Local Authority as soon as is practicable. The Company will accordingly advise the Local Authority if previously agreed noise levels are likely to be exceeded due to the adoption of alternate working methods.

Noisy plant or equipment will be sited as far away as is practicable from sensitive buildings. Use of barriers e.g. soil mounds, site huts, acoustic sheds or partitions to deflect noise away from noise sensitive areas will be employed whenever practicable.

Care will be taken when loading or unloading vehicles or dismantling scaffolding or moving materials etc. to reduce impact noise.

Newgate Construction Ltd recognises and understands that the Environmental Health Officers are bound by their duties and powers by current environmental legislation to investigate and secure abatement of any noise nuisance, regardless of the prediction work and use of any mitigation measures.

If levels are set, they will normally relate to a 10hr LAeq, but may also include 1hr LAeq, 1min LAeq or other period as may be required by the Local Authority.

5) Vibration:

Newgate Construction Ltd will ensure that measures are taken to:

- 1) Protect the residents, users of buildings close by and passers-by from nuisance or harm.
- 2) Protect buildings and their contents from physical damage in accordance with item (b) below.

In establishing these measures the Company will consider the following factors:

- a) Human exposure – The Company will comply with the current British Standard, Evaluation of Human Exposure to vibration in buildings (1Hz to 80Hz). The standards for vibration assessment are defined in this British Standard.
- b) Protection of structures and contents – The Company's operation activities will be carried out so that vibration arising will not damage adjacent structures and their contents.

Additional safeguards or tighter controls will be necessary or in sensitive locations e.g. hospital, educational establishments etc.

6) Hours of Working:

Hours of company operations will be restricted to comply with Local Authority restrictions. Generally they are as follows:

- 08:00 – 18:00 Monday to Friday
- 08:00 – 13:00 Saturday
- No Sunday or Bank Holiday working
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Any works outside the permitted hours are to be by prior approval of the Local Authority and require 14 days' notice.

Newgate Construction Ltd understands that approval will not be granted other than in exceptional circumstances and will be conditional on the Company informing local residents of the proposed activity.

Newgate Construction Ltd recognises that certain works that do not cause a disturbance to local occupiers can be undertaken outside the Cord Working Period. In such situations these will be a general standard that noise should not be perceived at sensitive facades because of these works.

7) Plant:

Fixed items of operational plant may have to be electrically powered and not diesel or petrol driven. Where this is not practicable, suitable attention (noise suppression) measures will be provided.

Vehicles and mechanical plant used for the purpose of the works shall be fitted with effective exhaust silencers, maintained in good and efficient working order and operated to minimise noise emissions.

8) Dust:

Newgate Construction Ltd will take all necessary measures to avoid creating a dust nuisance and will submit a statement to the Local Authority for approval identifying proposed measures before work commences.

9) Asbestos:

Special precautions will be taken if materials containing asbestos are encountered. Newgate Construction Ltd will comply with the Control of Asbestos Regulations 2012.

If the works involves the removal of asbestos or involves any form of demolition where the premises contain asbestos, which could be affected by the works, the Company will comply with the Control of Asbestos Regulations 2012. **Please note that all Asbestos removal will be carried out by Registered Contractors.**

10) Air Pollution:

Burning of materials on site or the factory will **NOT** be permitted.

Newgate Construction Ltd will take all necessary precautions to prevent the occurrence of smoke emissions or fumes from the site, or plant or stored fuel oils for safety reasons and to prevent such emissions or fumes drifting into residential areas. In particular plant should be well maintained and measures taken to ensure that nothing is left running for long periods of time when not in use.

11) Demolition and Contaminated Materials:

A general site investigation will be carried out and will include an examination of the sites where the presence of contaminated materials is suspected from information listed in any environmental statement and other available information.

From the results of this site investigation and other sources of information, handling and disposal procedures will be developed by the Company for each work site in agreement with the HSE and Environmental Agency. These may include the spate temporary storage on site for contaminated and uncontaminated spoil.

Newgate Construction Ltd will comply with the provisions of the current Control of Pollution Act and the Control of Pollution (Special Waste) Regulations. The removal and disposal of contaminated materials will be conducted under a strict consignment note system. Disposal sites will be agreed with the Environment Agency.

Newgate Construction Ltd will comply with the current Control of Substances Hazardous to Health Regulations and the current EH40 Occupational Exposure Limits to ensure that contaminated excavated materials are handled and disposed of safely and properly.

Newgate Construction Ltd will take measures to prevent the contamination of water courses and aquifers during works.

Newgate Construction Ltd will comply with current HSE Regulations, Codes of Practices, Health and Safety in Demolition, Preparation and Planning, Legislation and ensure that contaminated materials are handled and disposed of safely and properly.

Newgate Construction Ltd will ensure that materials and waste are not deposited in any surface water course. Any water that has come into contact with contaminated materials must be disposed of in accordance with the current Water Acts, any other relevant disposal

regulations and to the satisfaction of the NRA. For any discharge into a watercourse or river, approval will be required from the NRA and for any discharge into a sewer, a trade effluent consent will be required from the Local Water Authority.

If materials containing lead are encountered the Company will comply with the current Control of Lead at Work Regulations and HSE Approved Code of Practice and will be disposed of properly.

12) Site Boundaries/Hoarding:

All work sites will be completely fenced from public access by one of the following methods:

- 1) The Minimum Case – A post chain link/mesh fence where appropriate for minimum security
- 2) Standard Hoarding – A 2.4m minimum height, plywood faced, timber framed boundary hoarding of a surface density of not less than 6kg/m² for normal security and noise limitation requirements.
- 3) It may be necessary to increase the minimum height to protect buildings from noise.
- 4) Special Circumstances – Where a particular appearance or acoustic rating is needed.

The provisions of current Health & Safety at Work etc. Act 1974 will be followed in all cases.

13) Site Activities:

Rubbish will be removed at frequent intervals and the site kept clean and tidy.

Hoarding will be frequently inspected, repaired and repainted as necessary.

Lorries will enter and exit the site in a forward direction except where space restrictions do not allow this. These conditions will be subject to prior discussions with Highway Authority and the Policy before implementation.

All loading and unloading of vehicles will take place off the public highway whenever this is practicable.

Provision will be made:

- For easily cleaned hard standing for vehicles entering, parking and leaving the site.
- Wheel washing facilities including where practicable, mechanical wheel spinners. The wheel washing facilities will be brushed clean frequently.

Lorries that cannot immediately enter or leave sites must switch off their engines.

Mud on roads is regarded as one of the main environmental nuisance problems arising from construction/demolition sites Newgate Construction Ltd will take strict measures to minimise the problem.

Toilet facilities will be kept clean.

14) Urban Ecology:

Protection of Habitat:

Newgate Construction Ltd will comply with the provision of the current Wildlife and Countryside Act, with the requirements of the Unitary Development Plan and any conditions attached to planning permissions. The first priority is to maintain habitats intact and undisturbed and if possible to make improvement to enhance natural habitats. Planning conditions and agreements may include:

- a) Measures to prevent any encroachment onto valuable habitat during the construction/demolition process.
- b) Compliance with standards of dust and air pollution control.
- c) Precautionary measures to prevent the entry of pollutants into any bodies of water.

Where it is demonstrably impossible to maintain habitats in their existing condition then the species will need to be either:

- a) Relocated/transplanted to a suitable local site; or
- b) Disturbed habitats will be properly restocked to an equivalent or richer status after construction/demolition work ceases.

In either of these instances, the Company must consult with the London Ecology Unit and the Directorate of Leisure Services, Parks Services Section before the commencement of the works.

15) Mature Trees:

Newgate Construction Ltd will follow the specific requirements agreed with the Local Authority. No mature trees shall be interfered with without written consent from the Local Authority.

Adverse effects on mature trees within the vicinity of work sites will be minimised by the adoption of suitable mitigation measures, including, but not limited to the following (where appropriate):

- a) Selective removal of lower branches in an approved manner to reduce mechanical damage by construction plant.
- b) The use of matting around the root zone to prevent excess soil compaction.
- c) The use of chestnut paling around the truck to prevent damage

If any protected tree on the site dies or damaged because of the demolition process, a replacement tree of agreed species and age will be planted.

16) Use of Company Vehicles:

All Senior Management and staff shall consider the environmentally responsible section and use of its vehicles so as to reduce the impact of carbon dioxide emissions by way of efficient journey planning, average journey speed reductions and end of life disposal.

17) Procurement and Use of Materials:

Procurement:

Materials should be procured responsibly to ensure, wherever practicable, that they are not detrimental to the environment. Materials may have specific procurement policies which need to be followed, timber etc.

Timber:

Newgate Construction Ltd will ensure that the purchase of timber will be from responsibly managed forests, we will therefore seek to purchase timber certified by credible forest certification schemes and insist on checking that suppliers have a valid chain of custody certificate. Chain of custody is a mechanism for tracing certificated material from the forest to the final product to provide certainty that the product line, about which a claim is being made, is linked to a certified forest.

Aggregates:

To reduce the overall impacts of the process of aggregate extraction and transportation, the Company will endeavour to identify the location of all aggregate suppliers in order to make informed decisions.

Where possible, the Company will give preference to locally produced recycled aggregate, an encourage clients to change their specification to include aggregates from these sources.

Where the specification cannot be changed, or where recycled aggregates are not available locally, Newgate Construction Ltd will give preference to local supplier with established environmental management systems, which should include details on where the aggregates come from and how they are transported, what their policy is for quarry restoration, and measures taken to reduce the impact of the operations on the local communities.

Materials:

Materials proposed for use in the works will also be assessed to determine whether they will have any detrimental effect on the environment and subsequently whether these could be substituted for different materials. This could include checks on the environmental record of the companies producing these materials. Examples could include:

- a) High CO2 emissions in production, including, for example, in brick manufacture.
- b) Volatile Organic Compounds (VOCs) including paints, solvents, refrigerants etc.
- c) Hazardous chemicals, brick cleaning acids, concrete curing agents.

Waste as a Resource – Re-using and Recycling Waste:

Newgate Construction Ltd will operate its duty of care and other legal obligations and declining landfill space available, the re-use of materials is preferable to disposal both in economic and environmental terms. Re-use (i.e. using the material in its current form without further processing) is preferable to recycling (processing a material for use in a new product) as no energy is consumed as is usually the case with recycling. Both however, are preferable to disposal in landfill, as this loses potentially re-usable/recyclable resources, incurs increasing costs and takes up a significant amount of land.

An example of material re-use on sites includes the use of excavated soils/stones for noise bund, landscaping etc.

- a) Examples of material recycling on sites include:
- b) Concrete can be crushed and reused as fill or for haul roads.
- c) Asphalt planning can be processed and re-used as surfacing.
- d) Chipping vegetation to use as landscaping mulch.

Waste Produced on Site Used on Site:

It has always been the intention of the Company to use material produced on one part of the site in another part to complete the works, that is the use was certain, in accordance with design and any applicable planning permission, e.g. excavated soil in noise bunds, cut and fill etc.

Any material that is produced needs to go through some sort of process before being re-used/recycled, egg, concrete being crushed prior to reuse, then the material would be regarded as a waste. It would be deemed to be undergoing waste treatment and may require an Environmental Permit or an exemption from Environmental Permitting before its re-use.

Waste Minimisation – Preconstruction Phase:

Significant reductions in the potential for waste during the construction process can be made by careful consideration of waste reduction measures during the preconstruction and design stages. If the opportunity arises, the following may be considered:

- a) Specify good waste management in the contract preliminaries, requiring a Site Waste Management Plan as part of the tender process

Waste Minimisation – Construction Phase:

Good waste management on site tends to lead to a reduction to overall waste.

Well controlled sites tend to have:

- a) Dedicated lay down areas for individual trade contractors, clarifying the responsibility for tidiness and stock control and minimising the risk of accidental damage and poor materials controls.
- b) Covered storage for sensitive materials that could be damaged by rain, wind, sunlight, or careless handling.
- c) Secure storage for valuable materials.
- d) Appropriate storage for regulated materials, for example, fuels and oils to minimise loss and spillage and avoid the creation of contaminated materials which has to be disposed of, or the disposal of clean up materials.

Post Construction Maintenance:

On completion of a project, consideration will be given to offering surplus materials to the customer for future repair and maintenance, rather than simply “skipping” them at the end of the project. This has obvious benefits in reducing waste, and also providing a source of “matching” materials for the on-site maintenance team.

Packaging:

The use of bulk materials will be specified on orders wherever possible in order to reduce the demand on manufacturers to reduce the carbon footprint during production and the disposal volumes required at landfill. Where packaging has been used for delivery of the product, waste will be segregated for recycling purposes.

Guidance - Environmental Agency PPG6 Working on Demolition and Construction Sites.