

## Company Statement on the Environment

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Gary Fletcher (Surfacing) Limited has identified their social responsibilities regarding the Environment. The Company is committed to managing operations in a manner that will reduce the environmental impacts associated with its activities.

This policy covers all work undertaken by the company.

The Company will:

- A. Apply a structured process to enable the Company to identify and control all significant aspects of its activities and services.
- B. Commit itself to have continual improvements for the prevention of pollution whilst taking into account future work activities, local community views, employees and business targets.
- C. Ensure that current and future Environmental Legislation is achieved or surpassed with commitment to comply with non-statutory requirements.
- D. When applicable create a framework of an Environmental Management system to set, record, and where practical, measure and monitor specific Management objectives.
- E. Maintain procedures and training facilities for existing and new employees in order for each employee to recognize their individual responsibility and the benefits of Company's Environmental Policies and Procedures.
- F. Display the policy for the awareness of employees and the public and make available to all interested parties.

Signed:



Gary Fletcher  
Managing Director

Dated: November 2016

Environmental Policy & Statement  
Revised November 2016

Registered in England & Wales No. 3839699



## Environmental Policy

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We recognise the essential contribution the environment makes to the lives of everyone, we therefore aim to ensure that all of our services are managed so that they take every practical opportunity to improve and maintain the quality of both our local and global environments.

### **Company**

Gary Fletcher (Surfacing) Limited believes in the necessity to maintain a healthy and safe environment. To achieve this aim it will implement its policy together with its procedure and responsibilities, which support the policy.

All employees and sub contractors will be issued with the policy statement and individually be made aware of the procedures and responsibilities in the implementation of the policy.

### **Managing Director**

The Managing Director is personally responsible for the environmental performance of the company and the impact on the environment from its activities.

In every stage of project management from tendering through to completion, the impact on the environment will be identified, evaluated and actioned accordingly. Also taken into consideration will be the impact of significant operations on the locality in particular with regards to traffic, noise and air emissions. These will be discussed with the appropriate enforcing bodies and their requirements planned into the works.

Substances and materials used will whenever reasonably practicable be those compatible with maintaining the quality of the environment. Where this is not possible, due to client's requirements, care will be taken to ensure that so far as reasonably practicable, any substance or material is used in such a way as to prevent or minimise harm to the environment.

### **All Employees**

All employees have an individual responsibility to implement the environmental policy with any special responsibilities applicable to the position.

- Read, understand and obey the Company's environmental policy, procedures and rules. Keep up to date with any changes or revisions.
- Always work in accordance with method statement issued.
- Co-operate with the Company in the protection of the environment and conservation of natural resources.
- Develop a concern for the environment.
- Suggest ways of improving the Company's environmental performance.
- Before use of any item of plant, equipment or materials, ensure that neither unlawful environmental damage, nor infringement of rules will result from such operation or use.
- Report to your immediate manager or supervisor any potential or actual environmental hazard or incident.
- Refrain from 'horseplay' which may cause environmental damage.

### **Energy Management**

All employees will take reasonably practicable measures to keep energy usage to a minimum.

The Managing Director will actively encourage best practice in the use of plant, material, method of construction and the application of supervision.

Campaigns will be launched from time to time to remind all employees of the requirement to conserve energy resources, both at work and in their home.

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# GARY FLETCHER (Surfacing) LTD.

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### **Discharges to Water**

It is an offence to discharge a trade effluent, sewage effluent, poisonous, noxious or polluting matter into any controlled waters without discharge consent. Controlled waters include surface waters (ponds, streams, drains, drainage ditches, etc) groundwaters and coastal waters.

The Environmental Agency or the Scottish Environment Protection Agency has the powers to take remedial action to deal with actual or potential pollution affecting controlled waters.

Specific instructions and procedures will be produced for certain activities and in particular and where appropriate, relating to:

- Pumping from excavations, sumps, pits, tanks, ditches etc.
- Bunding of tanks and bulk liquid storage.
- Bulk fuel storage and use.
- Pipelines.
- Use of cement and concrete.
- River crossings.
- Sewage and effluent disposal.
- Material storage.

In the event of a significant pollution incident, professional advice should be taken and the Environmental Agency or the Scottish Environment Protection Agency will be informed immediately.

### **Waste Management**

Waste management activities are subject to control under Part II of the Environmental Protection Act 1990 and in particular Section 34 of the Act imposes a duty of care on any person, who produces, imports, carries, keeps, treats or disposes of controlled waste. Breach of the duty of care is an offence, with a penalty of unlimited fine if convicted on indictment.

Guidance on the duty of care is provided in an Approved Code of Practice. Failure to comply with the code is not in itself an offence, but the code has statutory backing and can be used by the courts to determine whether the duty has been complied with.

Waste material includes any household, commercial or industrial material, which the producer intends to dispose. Certain hazardous waste materials are designated as Special Wastes and require disposal via a specific pre-notification and consignment system.

Procedures will be continuously developed to ensure that all controlled waste produced or stored, is disposed of in accordance with legislation, codes of practice and guidance notes.

- Identify and classify the waste material and determine whether it qualifies as a controlled waste (see DOE Guidance – Circular 11/94). Certain potentially hazardous wastes (such as waste oil) are designated as special wastes and require additional disposal procedures. Special wastes should be identified by performing technical assessments (with assistance from the Environmental Agency or the Scottish Environment Protection Agency, if necessary).
- Ensure waste is stored in an appropriate receptacle, which is clearly labelled and secure.
- Ensure the waste is safely and securely stored prior to transport and is clearly labelled. Each movement of special waste must be accompanied by a consignment note and the Environmental Agency or the Scottish Environment Protection Agency must be pre-notified.
- Ensure only registered or exempt waste carriers, holding a Certificate of Registration are used to transfer the waste. Special waste transactions must still comply with the requirements of the duty of care.
- Provide an adequate written description of the waste.
- Obtain and retain waste transfer notes for at least 3 years for all waste transactions. Copies of these notes will need to be passed to the client.

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- Ensure that the waste material is disposed of, or treated, at a suitably licensed waste disposal facility.
- Do not permit any inappropriate (and unlicensed) waste disposal, such as waste burning or burial on the site. It is an offence to treat or dispose of waste without a waste management licence.
- Potentially contaminated soil or subsoil should be classified by carrying out appropriate analysis. On the basis of the analytical results a risk assessment should be performed to determine the materials contaminative threat and hence the necessary disposal route to minimise the risk of environmental pollution. Assistance in this process should be gained from the Environmental Agency or the Scottish Environment Protection Agency.

***Air Emissions***

Part III of the Environmental Protection Act 1990 enables local authorities and individuals to take action to secure the abatement of a nuisance. Nuisance can comprise of dust, smoke, fumes, smells etc. The Local Authority can also take action to prevent dark smoke emissions under the Clean Air Act 1993.

Therefore where the Company's activities or premises require statutory registration, this will be undertaken. In those premises monitoring regimes will be established to ensure that strict limits relating to emissions are not exceeded and that process and plant are controlled and maintained to achieve this.

Action will also be taken on site to reduce generations of dust and other emissions. Airborne material must be minimised to prevent secondary pollution of the land or water.

- Damp down surfaces during dry weather.
- Sheeting of all open lorries and trucks.
- Sheeting of stock-piled materials.
- Ensure fires are not used to dispose of waste unless specifically authorised by the local enforcing body.
- Take steps to minimise the generation of odours by covering bitumen tanks, water quenching and temperature optimisation.

***Noise***

The principal legislative control on excessive neighbourhood noise is the statutory nuisance provisions contained in Part III of the Environmental Protection Act 1990. Local Authorities must take steps to investigate any complaints of statutory nuisance incidents and take steps to abate them.

Noise can greatly interfere with the comfort and enjoyment of life and as such, it constitutes a nuisance in law. It may have various effects on people, ranging from annoyance or discomfort, to psychological and pathological conditions. The degree to which noise affects an individual depends on:

- its nature and intensity,
- its duration and the frequency and time of occurrence,
- the activity being undertaken by exposed individuals,
- their degree of sensitivity.

Sound can be measured scientifically by its energy and frequency. However, noise is subjective and is more a matter of human values.

Construction activities are inherently noisy and often take place in areas that are normally quiet. Section 60 of the Control of Pollution Act 1974 (COPA) gives the local authority specific powers to serve a notice imposing requirements as to the way in which construction works are carried out. British Standard 5228 (Noise Control on construction and open sites) provides guidance to enable compliance with Section 60. Neither COPA nor the related Codes of Practice set down specific limits

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for construction site noise. This is on the basis that the relevant local authority knows its own locality best and would have a better idea of suitable noise limits.

Procedures will be continuously developed to minimise the potential to generate significant noise levels:

- The key noise issues should be identified at the planning stage with alternative options to specific noisy operations being considered.
- Information on the likely noise levels associated with specific operations and machinery should be obtained.
- Prepare a schedule of the key noise issues and cross-reference with the project requirements.
- Noise levels of specific operations and plant.
- Duration of noise.
- Proximity of sensitive receptors (school, hospitals, churches etc.).
- Consider using alternative operations or plant to limit noise generation.
- When noise levels are still likely to be significant, specific consideration should be given to methods which lessen the nuisance such as:
  - Providing acoustic barriers or other physical noise controls.
  - Phasing operations to avoid sensitive periods (e.g. early morning).
  - Pre-notification of the affected parties.
  - Ensure the plant is shut down when not in use.
- If particular noisy operations are unavoidable and are likely to cause a nuisance, prior consultation should be carried out with the Local Authority's Environmental Health Department. The advance consent acquired with respect of the methods by which the works are to be carried out (under Section 61 of COPA) would effectively give immunity from action on noise grounds (so long as the terms of consent are complied with).

#### ***Conservation Issues***

Construction activities may impact on sensitivity ecosystems or archaeological features, which require particular consideration and may have statutory protection. In some cases, construction developments may incorporate such features as part of the final development.

Measures to protect such features during the construction process as required ensuring they are not damaged in any way.

- Sensitive or protected ecosystems (e.g. Sites of special Scientific Interest, National Parks, Tree Preservation Orders, rare or endangered flora or fauna) and archaeological artefacts or remains (e.g. National Trust Sites) should be identified by the client prior to the commencement of site works.
- The project should be designed to minimise impacts on sensitive features. Examples of appropriate impact reductions methods include:
  - Consideration of alternative, less sensitive sites.
  - Phasing or timing of construction works to avoid particular sensitive periods (e.g. nesting birds).
  - Choosing transport or haulage routes to minimise disturbance.
- Consult English Nature and or other relevant environmental and conservation organisations for advice on how to deal with environmentally sensitive areas or issues.
- If any hedgerow removal is required the client should gain specific approval from the Local Planning Authority during the planning stage.
- Clearly identify, mark and or fence off sensitive areas of the site and if necessary erect explicit notices.
- Ensure all site personnel are made aware of the need to protect the designated areas.
- Where required a fenced buffer zone should be included around the feature requiring protection. In the case of trees (particularly those protected by a Tree Preservation Order) the buffer zone should extend at least to cover the area of the tree canopy (which should provide adequate protection of the root system).

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- The Site Supervisor is responsible for regularly monitoring the impact of construction activities on the sensitive features through regular inspections.
- Take measures to ensure that run-off is prevented from entering or affecting sensitive areas, where necessary install cut off trenches or bunds to intercept any run-off. Any waste water run-off likely to enter a watercourse would need discharge consent from the Environment Agency.

### ***Implementation***

#### *- Training*

Persons with a role in implementing environmental controls will be provided with the necessary training and instruction in order to discharge their responsibilities. The Company will ensure that its employees take advantage of such training and put that teaching to the best effect.

#### *- Audit*

Audits and inspections of compliance with environmental law, codes of practice and company procedures will be undertaken at regular intervals. The reports and recommendations will be submitted to the Managing Director.

#### *- Monitoring*

Monitoring compliance with this policy will be undertaken by the Managers and Supervisors. They are expected to respond accordingly and if necessary discipline those failing to comply with the codes of practice and procedures. Monitoring will also extend to sub or work package contractors whose subsequent selection and employment will be dependent on their co-operation and compliance in environmental matters.

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