

# **Construction Method Statement**

Phase 6, Haverhill.

Prepared by Persimmon Homes

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Rev C

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## **1.0 Aim**

The Construction Method Statement has been prepared in response to the requirements of the Condition of Planning Permission and should be read in accordance with supporting documentation in respect of the discharge of planning conditions. It also implements and promotes safe systems of work throughout the various stages and construction activities involved with the project.

This Construction Method Statement will be implemented by the Construction Team with assistance from all Persimmon departments to enable adherence.

## **2.0 Hours of construction operations**

There will be no construction work outside the hours of 07:30-18:00 Monday to Friday and 08:00-13:00 on Saturdays. No construction work to take place on Sundays or Bank Holidays.

The Site Management team will induct and advise all site personnel, visitors, contractors and deliveries to the approved working hours of the development. These will also be communicated to the workforce during site induction.

## **3.0 Construction Traffic Route and Site Access**

Construction traffic will come from Farrant Road, passing phase 1 and 2 and entering through the north of the compound and taking access into the site through a haul road running north-south from the compound (see Appendix 2).

There will be no construction access from Ann Suckling Road. Signage shall be installed at the Junction of Ann Suckling Road stating that there is no access for construction traffic or deliveries to the development. Directional signage will be placed on the approach to the site. All contractors and deliveries will be made aware of the route to be used.



## **4.0 Site setup**

### **4.1 Parking of vehicles for site operatives and visitors**

Site staff and contractor parking will be within the site compound area located within the site boundary (See Appendix 2).

No parking will be permitted on the surrounding highways.

### **4.2 Delivery of plant and materials**

Construction traffic will enter the compound from the northern entrance of the compound, and will leave through the exit in the south of the compound towards phase 2b.

No unloading of vehicles will take place on the highway, all unloading will be within the confines of the site.

Every effort will be made to schedule deliveries so that unnecessary vehicle movements to and from the site are avoided. All construction plant used on site will be of a size and type required to undertake the construction operation safely and efficiently.

Deliveries of materials will be organised to maximise the safety of all personnel. The emergency services, e.g. fire appliances, ambulances, etc. will use the same access routes to the working areas. These routes and the main entrance to the site will be kept free from obstructions throughout the construction phase. Loading and unloading operations shall only be undertaken within the site boundaries.

Traffic rules apply (No illegal parking, speed limit of 5 mph), and place materials as close to the working area as possible. Materials will be ordered on a 'just in time' basis to minimise the amount of space needed on-site. Deliveries and collections will avoid peak times to minimise contact with the public.

No unloading of vehicles will take place on the highway, all unloading will be within the confines of the site, unless not practically possible. If the unloading must happen within highways then care must be taken to obey parking restrictions and to avoid blocking access to neighbouring properties or emergency services. All operative will be made fully aware of any restrictions on deliveries for the site.

To the greatest practicable extent, vehicle and pedestrians will be segregated.

### **4.3 Arrangements for storage of plant and materials and Inspection**

Plant will be stored within its own fenced off area within a compound so it is secure when not in use, material will be stored within the material storage compound as indicated by the plan. Any plant will be refuelled within the compound.

All contractors are to supply, maintain, inspect and operate their own equipment and plant. Scaffolds/towers/access systems erected on the site also fall under this category.

- All portable electrical tools and appliances must be battery operated or 110 volts
- If circumstances dictate that 230v is required, it must be protected by a 30mA RCD and prior approval of its use must be given by the Principal Contractor's Site Project Manager. Furthermore, the PAT inspection regime is to be monthly for 230v.
- All 110-volt equipment is to be inspected and PAT certificated by a competent person at suitable intervals as defined in HSG141/107/150 and copies of the test certificates must be available to the Site Project Manager.
- All appliances will be visually inspected prior to use by the user.
- Only a day's supply of fuels/oils and lubricants are to be brought onto the site (but never into the facility) to support plant running. Flammable oils/lubricants are to be stored in appropriate plastic/metal containers, with protection against spillages and a suitable means of spill clean-up kit available. Any storage tanks are to be bunded.
- Records of all inspection certificates are to be kept in the site safety management file.
- Contractors are to ensure barriers/exclusion must be fully utilised to protect 3rd party operatives.
- All operatives are to ensure that when it is necessary to leave the facility unattended during the maintenance phase they secure the entrance door to prevent unauthorised entry by others.
- No LPG is to be left unattended on the active site and must not be left on the site at the end of the day.

### **4.4 Traffic Routes and Segregation of Vehicles and Pedestrians**

A traffic management plan will be in place with segregation of pedestrian and vehicle traffic and the implementation of a one-way system will be enforced where possible. A banksman will safely guide all vehicles arriving at the site, and a site speed limit of 5mph will be enforced. All reversing and turning is to be carried out under the constant supervision of a banksman. Drivers must take care when other vehicles and pedestrians are in any area through which they are moving. Where possible audible and visual signals are to be used for any reversing.

Manoeuvring of any sizeable loads or vehicles to be carried out with signaller in attendance, to ensure that third parties are kept clear of site operations. All plant ordered by the Principal Contractor will be through an external plant hire company that will ensure that the plant complies with all current legislation. The Site Manager, prior to accepting the delivery, will check all machine certification. Hired equipment must be tagged and inspected.

All plant involved in lifting operations on site must have current valid lifting certification as detailed in the Lifting Operations and Lifting Equipment Regulations 1998. Copies of the certification and current weekly inspections will be held in the site H&S folder.

Operatives should be trained and competent for the use of any specialised tools or equipment with copies of training certificates held on-site. Plant and machinery statutory testing and examination certificates are to be held on-site. This includes hand-over and weekly inspections to verify scaffolding as safe for use and regular inspection and testing of portable appliances. 110- volt portable equipment to be used, supplied via a transformer, centre-tapped to earth or suitable power generator. Plant utilised by subcontractors during the contract must have up to date certification which should be presented to our site agent prior to the commencement of the work. All plant operator licences and training certificated must be presented to the Site Manager before they will be allowed to start work on site.

#### **4.5 Site Layout and Information**

Information relating to general health, safety and environmental matters, site specific information and statutory notices will be displayed on the site notice board. This includes the following:

- Contract Name;
- Site Plan;
- Current Key Risks and Information;
- This Week's Topic;
- Health & Safety Law Poster;
- Designated Fire Marshal (s) and First Aider (s);
- F10;
- Insurances;
- Policy Statements;

- Site Information (Fire Alarm, Deliveries, Parking, Emergency (Medical), Environment, Police, HSE).

A plan of the site compound layout and traffic management will be produced and displayed on site notice board. It identifies the following as far as is possible at this stage in the contract:

- Vehicle and pedestrian routes around site by means of metal pedestrian barriers and gated vehicle access to provide safe access throughout the work areas and also control access between show home visitors and residents during construction. These routes will be updated as construction progresses within the development.
- Emergency muster points.
- Fire extinguisher locations.
- First aid box locations.
- Welfare facilities.
- Safety signs .
- Location of foul and surface water drains.
- Spill kits.
- TPO's and other ecological mitigation/aspects .

The plan is suitably developed for commencement on site, it is a live document and will be amended as necessary as work proceeds and adapted to site conditions. It will be drawn to the attention of contractors and their operatives during induction.

The following Pre-construction information and reports will be reviewed by the Construction team and will be continued to be considered throughout the development:

- Clients Brief
- Constraint plans
- Arboriculture Method Statement
- Badger Survey
- Reptile Survey
- Hazel Dormouse Survey Report
- Bat Activity Survey Report



- Ecological Constraints Plan
- Hedgerow Survey
- Breeding Bird Survey
- Geotechnical Assessment
- Phase 1 & 2 Desk Study & Site Investigation Report
- Utility Plans

#### **4.6 Site Boundary and Public Protection**

Site security fencing (1.8m high) will be provided around the perimeter of the development, which will be double clipped wind braced with appropriate hazard warning signage. Site entrances will have gated access, with appropriate signage and contact details for visitors and deliveries.

The proposed arrangements for security and the protection of the public are as follows:

- Any visitors to the site will be directed in the first instance to the site office.
- All visitors will have to sign in on arrival and sign out when leaving the site.
- All public access areas to be clearly marked.
- Work areas fenced off and kept secure.
- Any compound enclosures will be secured at the end of the working day or if unattended during the working day.
- Posters and signs erected to inform and indicate safe routes.
- Interface with the public will be kept to a minimum by means of metal pedestrian barriers and gated vehicle access to provide safe access throughout the work areas and also control access between members of public and residents during construction. These routes will be updated as construction progresses within the development.

The proposed arrangements regarding work in public areas are as follows:

- No work will be permitted in public areas unless the proposed work area has been isolated by Heras fencing / low-level barrier fencing with signs indicating that work is being carried out.

- No debris, waste or tools will be left unattended in areas accessible to the public UNLESS these are in such a position or in such a condition that they pose no significant health and safety risk. When assessing this consideration will be given to the possible presence of children in the area. Refer to Part vii for Management of Waste.
- All existing public rights of way will be managed to remain separated from construction activities and will remain open, and protect from the construction area by Heras fencing and or chapter 8 pedestrian barriers and signage.
- Permission to temporally realign any footpaths to allow safe working practices if required will only take place after consultation with the Highways Department and once approved.

Site security will be maintained during the construction phase. The site will be secure at all times to prevent entry by children, members of the public, trespassers and vandals.

Warning signage is to be placed at strategic points on the fencing. The Health and Safety signage will include guiding traffic routes, giving warnings of hazards and potential dangers (such as “Danger: Keep Out” etc.) and instructing conduct within the site boundaries (such as “Do not remove security fencing”/” Appropriate PPE must be worn ...” etc.)

The Site Manager will ensure that the site fencing is in good condition each day to prevent unauthorized access to the site compound.

#### **4.7 Plant and Site Equipment Washing Facilities and Road Cleaning**

Persimmon Homes will minimize, as reasonably practicable, driving off designated hard areas by adhering to the Traffic Management Plan.

All roads will be managed to avoid as reasonably practicable, any mud or debris being deposited onto the public highways. This will be monitored throughout the working day. Thorough inspections will be done at the end of each working shift. The Wheel Washing location is shown on drawing 039-E-470. When necessary all vehicles wheels leaving site will be cleaned to ensure that mud is not carried onto existing roads. Dirty water, mud and debris will not be discharged onto the carriageway. A hard standing area will be constructed for the lorries to park on whilst getting their wheels washed. The slab will fall onto a land drain at the side of the hardstanding. The land drain will fall into a manhole/catchpit which will be pumped out as and when required. Should any debris be found then it will be cleared up using a shovel and broom, forklift with sweeper attachment or if deemed necessary and industrial sweeper.

An adequate supply of water will be available on-site to enable practical washing facilities and dust control. All dust and mud control equipment will be maintained in good condition and maintenance activities will be recorded. Site hoarding, barriers and scaffolding will be kept clean.

## **5.0 Project Health and Safety**

Persimmon Homes have established a health & safety strategy for the works with a target of zero accidents of all types, and in addition we will set up a benchmark standard for the monitoring of health and safety standards on this project by means of a system of monitoring of incident and accident frequency rates, using both active and reactive monitoring procedures prior to the commencement of works. All subcontractors working on this project will be expected to achieve a similar standard and provide outline procedures for inspecting and auditing during the project.

Our divisional Health & Safety officer will visit site prior to, after site set up and once works have commenced. During these visits site activities will be discussed to ensure that these do not become a nuisance to any surrounding area's or site neighbors.

## **6.0 Dust Control Measures**

Dust and dirt will be controlled with our SHEQ procedures. We will commit to controlling the dust as far as is reasonably within our control. The following mitigation measures will be adopted to minimise impacts:

- Use localized sheeting, where would be effective, to screen and contain any dust – such as heras fences with covers.
- Completed earthworks will be covered or vegetated as soon as is possible.
- Exposed soil and stockpiles will be covered when necessary.
- When required, exposed soil and stockpiles to be dampened down to prevent dust blowing.
- When required, using water sprays via a bowser to damp down dust in dry weather, primarily focusing on areas in close proximity of residents.
- Fine water sprays will be used on equipment such as loading shovels, hoppers and other such equipment were appropriate.
- Prefabricated goods and materials will be used to reduce the need for grinding, sawing and cutting on site wherever reasonably practical.
- All vehicles carrying loose or potentially dusty material to or from the site will be fully sheeted.
- When required, regular road sweeping will be undertaken to prevent the build-up of dust on on-site roads and wet sweeping methods will be utilised if required.

- If necessary, public roads and pavements will be swept and wet sweeping methods will be utilised if required.
- Regular site inspections will be carried out to monitor compliance with dust control procedures set out above and the results of the inspections will be recorded, including nil returns, in a logbook.
- Any exceptional incidents causing dust episodes on or off the site will be recorded and the action taken to resolve the situation in the logbook detailed above.
- Double handling of material will be avoided wherever reasonably practicable.
- Drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment will be minimized.

## **7.0 Noise Control Measures**

Noise & Vibration will be controlled in line with our SHEQ procedures, with examples of impacts and mitigation measures are detailed.

Noise and vibration will be caused during construction activities by:

- Traffic movements.
- Plant movements.
- Excavating operations.
- Generators.
- General construction activities.

The following mitigation methods will be implemented in order to mitigate the impacts of noise and vibration:

- Noise and vibration will be limited to the approved working hours.
- Contractors must use “best practicable means” (BPM) to minimise the nuisance from noise and vibration.
- The use and location of plant will be planned to minimise noise impact.
- Induction training for site operatives and specific training for staff having responsibility for particular aspects of work that will impact on controlling noise from the site.
- Intermittently operating plant will be shut down in the intervening periods between operations.
- All pneumatic tools will be fitted with manufactures silencers or mufflers.
- Wherever possible, the use of hydraulic attachments or other means of crushing concrete and hard materials will be used in preference to pneumatic breakers.

- Deliveries will be programmed to arrive within the approved hours only. Care will be taken when unloading vehicles to minimise noise. Delivery vehicles would be routed so as to minimise disturbance to local residents. Delivery vehicles will be prohibited from waiting on the highway or within the site with their engines running.

In terms of monitoring, the site management team will be responsible for ensuring that the above is adhered to.

## **8.0 Waste Management Procedures**

Waste materials from the construction process will be deposited in waste skips provided by the company, which will be emptied on a regular basis. A licensed waste handler will manage the waste, and a record of waste transfer notes will be maintained on-site. Any hazardous waste will be marked as such and handled and disposed of in an appropriate manner.

Persimmon Homes will not at any time permit the burning of waste materials on-site unless in agreement with the Client and with a license from the local authority. Every effort shall be made to comply with the Environmental Protection Act 1990 to prevent the pollution of the existing watercourses whilst the works are being undertaken.

Persimmon Homes are committed to reducing the waste generated by their projects, minimising the waste that is sent to landfill through our waste management processes and to maximise the opportunities for using materials with high recycled content. In order to do this we require the support of our supply chain. Our supply chain has a role to play at all stages of the project – pre construction / planning, construction and post construction. A copy of Persimmon Environmental Management System is appended to this report.

All waste is managed in line with environmental legislation. All waste produced by Persimmon Homes as part of the contract is taken onto the highway by a licensed waste carrier under a waste transfer note and disposed of at a licensed facility, preferably a waste transfer station to maximize recycling opportunities. Suitable storage facilities are provided for all waste, including hazardous waste streams. Copy of Persimmon's Environmental Protection (Duty of Care) Regulations is appended to this report.

## **9.0 Public Relations and Complaints Procedure**

Persimmon Homes commits to keeping the local Parish Council and nearby residents updated by various means of communication;

- Leaflet drops to local residents
- Emails to the Parish Council and local resident representatives
- Face to face conversations at the Site and Sales Offices

Persimmon Homes is open to communication with the public to promote positive relationships and to continually improve the way we operate.

### **Complaints Procedure**

Complaints can be made to the Sales team, Site Manager or Planner, either in person, via the phone or email.

Complainants will be listened to and encouraged to fill and sign Persimmon Homes complaints form.

A log of complaint forms will be kept by the Site Manager, this will also provide how complaints have been resolved. This log book can be requested by the Local Enforcement and Planning teams to view at any time.

## **Appendix 1 – Environmental Management System**

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## Persimmon Environment Policy

Persimmon plc is one of the UK's leading housebuilders, with regional offices and developments throughout the country. We recognise that our activities have an impact on the environment and that we have a responsibility to consider and minimise these impacts where possible. This commitment is formalised through our Environment Policy, which forms a key part of Persimmon's overall approach to Corporate Responsibility (CR).

We place great emphasis on designing our developments to be in keeping with the character of an area, and to protect and enhance the local environment and surroundings. We aim to make a positive contribution to the communities in which we work.

We actively comply with relevant environmental legislation and throughout the planning and building of our new developments we adhere to local planning guidance and building regulations.

We have reviewed our environmental impacts and identified those which are the most important for us to monitor and control. As a result we endeavor to:

- Adhere to the principle that the homes we design and build are inherently efficient, this being achieved through design and construction, without the need to use additional technologies to improve energy efficiency,
- Procure and use materials efficiently during the house building process, including the use of locally sourced materials, existing materials on site and recycled materials when appropriate,
- Minimise the amount of waste we produce through effective design and on-site management,
- Make the most efficient use of land, including the regeneration of redundant or contaminated land,
- Protect and enhance the natural habitat and local surroundings throughout the development process,
- Prevent pollution occurring at our sites.

In these areas, we regularly monitor and review our progress. This policy forms the basis of our Environmental Management System (EMS), which is implemented across our business. This includes detailed guidance and procedures relating to our environmental impacts and how to minimise these impacts during the planning, design and construction of our developments.

We understand that our stakeholders are interested in how we manage our impact on the environment and how we are performing. We also appreciate that they may provide views and opinions that can strengthen our approach to environmental management. We will openly communicate on environmental issues with interested parties and report on progress at regular intervals on our website.



We will provide training appropriate to our employees' particular environmental responsibilities to ensure that they are aware of our environmental impacts and their role in managing them.

Our performance is monitored and reviewed by the Persimmon CR Committee, a committee of senior management and representatives from across the Group. Responsibility for implementing this policy rests with the Managing Directors of each of the Group's operating businesses. On each site, the Site Manager is responsible for the day to day management of environmental issues and ensuring adherence to our policy.

Our Environmental Policy, first introduced in 2002, is reviewed annually to ensure its continued relevance to our business operations and our approach to Corporate Responsibility.

## 1. Introduction

Persimmon plc is one of the UK's leading volume house-builders, with regional offices and developments throughout the country. We recognise that our activities have an impact on the environment and that we have a responsibility to consider and minimise these impacts, where possible, throughout our activities. This commitment is formalised through our Group Environment Policy (see point 5 below).

Responsibility for environmental management rests with the Persimmon CSR Committee, comprised of senior management and representatives from different functions across the business, and forms part of Persimmon's overall approach to Corporate Social Responsibility (CSR).

The Committee takes regular account of the significance of environmental matters to the business on behalf of the Board and ensures that adequate policies and procedures are in place to manage any risks. They are also responsible for ensuring that the Group Environment Policy and procedures are reviewed and updated on a regular basis.

This manual provides a structured approach to managing environmental issues and defines the Persimmon Environmental Management System (EMS). This system has been developed to be simple and appropriate to the needs of the business, whilst acknowledging the principles of recognised standards, such as ISO140001. However, there are no current plans to seek certification to such a standard.

Each operating business must be aware of the environmental issues associated with the construction process, their obligations and the potential risks and opportunities that may be present. This manual provides guidance on this, and references other useful information. However, much of this has been carried out on construction sites for many years and is recorded in various internal manuals and documents across the business. The purpose of this manual is to draw together this best practice into single reference manual for the business.

This document does not replace advice and guidance provided in the Persimmon Group Construction Safety Manual or other documents nor does it replace contact with regulators or provide detail on legislation and compliance. Detailed advice should always be sought from the local Construction Director, Group Health and Safety Director or the Group Legal Director.

All staff should also be aware of policies, procedures and guidance set out in this manual. These include:

- Local Boards of Directors
- Senior management in each operating business
- Technical departments
- Designers
- Buyers
- Health and Safety Advisors

However the information provided in this document is primarily focussed at five groups of staff:

- Construction Directors
- Contracts Managers
- Site managers
- Site Engineers
- Quantity Surveyors

This manual is intended for internal use only, although extracts may be provided to external stakeholders, if deemed appropriate by the CSR Committee.

## **2. Benefits of environmental management**

Adopting an environmental management system is an important step in developing good environmental practice throughout the Company. Whilst ensuring Persimmon minimises its impact on the environment, there are a number of other benefits from adopting good practice. These include:

- Prevention of damage to our natural environment.
- Fewer disturbances to neighbours and local communities.
- Improved opportunities to tender.
- More efficient use of materials and reduced waste.
- Fewer environmental incidents and reduced risk of prosecution.
- Better relationships with regulators, planners and other public bodies
- Less time and money spent repairing environmental damage.
- Improved reputation and profile.

## **3. Environmental obligations**

There are a number of environmental obligations to which the Company must adhere. These have both legislative and contractual origins and include:

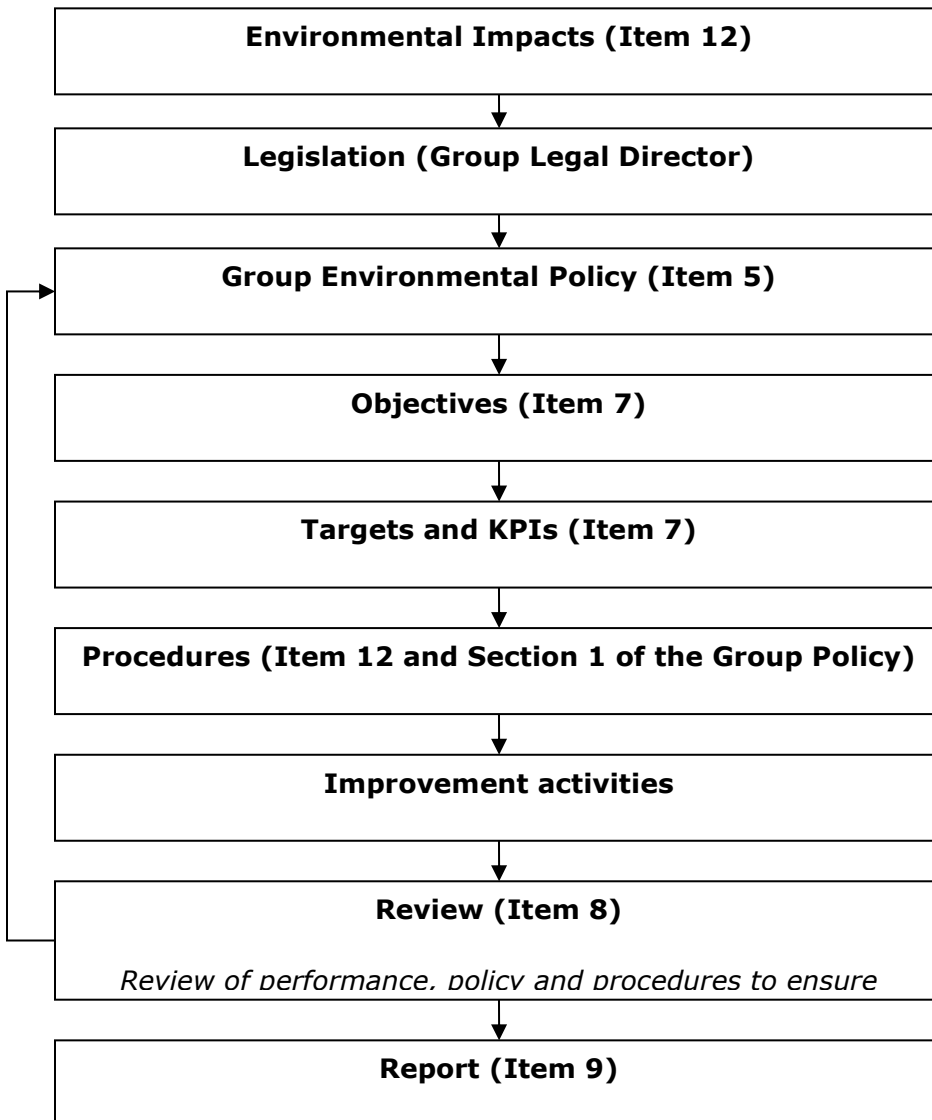
- Environmental conditions included within contracts and planning consents.
- Legislation and regulation, including the Environmental Protection (Duty of Care) regulations.
- Requirements imposed by local authorities (e.g., under the Planning Acts).
- Corporate control and governance.

Detailed information relating to relevant environmental legislation can be provided by the Group Legal Director. For additional information relating to the Environmental Protection (Duty of Care) Regulations, see Group Policy Section 3 item 13 of the Construction and Generic Risk Assessment Manual

#### 4. The Persimmon Environmental Management System

The Persimmon Environmental Management System (EMS) covers all aspects of the Group's business and relates to all operating businesses. It provides a practical framework within which environmental issues can be managed and the Company's environmental impacts minimised. This is described in the diagram below:

Diagram illustrating the elements of the Persimmon EMS



## **5. Group Environmental Policy**

The Group Environmental Policy was first established in March 2003 and has been approved by the Group Chief Executive. This policy sets the principles behind all our environmental activity. It is reviewed on an annual basis and is publicly available on the Persimmon website.

Persimmon places great emphasis on designing its developments to be in keeping with the character of an area, and to protect and enhance the local environment. Through the reclamation and remediation of previously developed land we aim to improve the local environment. We actively comply with relevant environmental legislation and throughout the planning and building of our new developments we adhere to local planning guidance and building regulations.

We have identified three main priority areas where we intend, where practicable, to minimise our impacts. These priority areas are:

- Make efficient use of materials and minimise the waste generated from our sites;
- Prevent pollution occurring at our sites;
- Ensure that the natural habitat and environment is protected throughout the development process.

We will set objectives and targets, where appropriate for our most significant impact areas and will monitor and review our performance against these. In addition, we will review our policy on a regular basis to ensure its relevance.

We understand that our stakeholders are often interested in how we manage our impact on the environment and how we are performing. We will openly communicate on environmental issues with any interested parties and report on progress at regular intervals on our website. We also intend to ensure our employees are aware of our environmental impacts and their role in managing them, particularly for potential instances of pollution at our sites.

This policy is implemented and monitored by a steering committee of senior executives and representatives from across the business. The CSR Committee will review progress against our objectives on a frequent basis and will ensure that our approach is fully coordinated with other organisational policies and initiatives.

## **6. Responsibilities and implementation**

The Persimmon CSR Committee is responsible for establishing the Group Environmental Policy and Environmental Management System within the Group. The Committee is also responsible for the regular review and updating of policies and procedures. The Committee will also set Group objectives and targets where appropriate.

Through this Committee, the Group Legal Director is responsible for providing appropriate advice on environmental legislation.

It is essential that Directors of each operating business translate the decisions of the CSR Committee into action for their particular operating business and ensure that the Group Environmental Policy is communicated to all employees. The Directors must also ensure that the guidance and procedures referenced in this manual are made available to all site staff, particularly to Site Managers.

For each development, the Construction Director and Contracts Manager are responsible for ensuring that environmental practices on site are monitored. They are also responsible for liaising with the local regulatory authorities where necessary.

This is supplemented by regular visits by health and safety advisors, who also review environmental practices on site as part of the regular health and safety inspection process.

On each site, the Site Manager is responsible for the day to day management of environmental issues and ensuring that environmental procedures contained within this manual are implemented. These responsibilities are assigned as part of the workload of the Site Manager alongside quality assurance and health and safety.

Site Managers are also responsible for implementing the environmental emergency incident procedure in the event of environmental incident, such as an oil spillage, occurring on site.

All employees are expected to adhere to environmental procedures and guidance set out in this manual and to provide feedback and suggestions for improvements where appropriate.

## **7. Objectives and Key Performance Indicators**

The Group Environmental Policy is supported by objectives in the Group's most significant environmental impact areas. The CSR Committee is responsible for setting and reviewing these objectives on an annual basis.

Environmental performance is measured using a series of key performance indicators (KPIs). These are developed and monitored on a regular basis by the CSR Committee.

Environmental objectives and business' performance against them is reported annually in the Persimmon Corporate Responsibility Report, published on the Company website.

## **8. Review**

Each element of the EMS requires review over different timescales. The CSR Committee is responsible for ensuring that each component is reviewed according to the table below.

<b>Component</b>	<b>Frequency of review</b>
Impacts	2 years or any significant change in business
Policy	1 year
Objectives and targets	1 year
Procedures and guidance	2 years or in line with new legislation or guidance

## **9. Reporting on performance**

Environmental performance is reported annually in the Persimmon Corporate Responsibility Report published on the Company website and in our Annual Report and Accounts. Information will also be provided to interested organisations and stakeholders, including investors and fund managers, if requested and considered appropriate by the CSR Committee.

## **10. Dealing with Regulatory Authorities**

It is important to keep the regulators informed of activities during the planning process and operation of a site, as they are more inclined to be helpful if they know what is happening and why. This includes informing them in advance of potential problems or issues.

Whatever the size of the development, it is always advisable to contact the Environment Agency (if in England or Wales) or SEPA (in Scotland) and the relevant Local Authority as early as possible to discuss the project with them. They may be able to provide helpful advice on environmental issues of local importance of which we may not otherwise be aware.

Regulatory bodies will include:

- Local Authority Environmental Health Officers
- Environment Agency
- Scottish Environmental Protection Agency
- Health and Safety Executive
- English Nature
- Country Commission for Wales
- Scottish Natural Heritage
- County Archaeologist

These bodies welcome an early approach and this should be considered a valuable investment of time and effort. It is important to develop a dialogue with the officers who will be monitoring the development. This facilitates approval procedures and is likely to help if things go wrong.

In case of emergency (e.g. a pollutant spill into a water system) the Site Manager will contact the Environment Agency or SEPA immediately as part of the emergency procedures (Section 8.14). The incident hotline for both the agencies is **0800 807060**.

If other environmental issues should arise on site, the Site Manager must contact the relevant Construction Director who will alert the Environment Agency or other appropriate body.



## **11. Legal considerations and preliminary planning issues**

Prior to development, the Land Department will commission a desktop survey to establish prior uses of a site. The results of this survey will be forwarded to the engineering contractor responsible for carrying out intrusive soil survey tests. This will assist them in determining the number and position of the trial pits from which core samples are to be taken. The results from the intrusive ground investigations will be used to determine, amongst other matters, what contamination is present on site.

The Company Solicitor will undertake relevant searches; including an Environment Agency search and Archaeological search in order to be appraised of any past pollution or archaeological remains which may be found on the site. The Land Department will report any findings arising from these searches or surveys in advance of the handover meeting so that all environmental and archaeological aspects of the development can be included in the site Health and Safety Plan.

Will this be the case?

Current health and safety legislation, namely the Construction Design & Management Regulations 1994 (CDM), require Persimmon, when acting as client to engage a Planning Supervisor to produce a Pre-Start Health and Safety Plan to identify significant hazards prevalent on site and to identify and detail how the risks from these hazards are to be controlled. The Groups hazard identification process will include consideration of environmental issues relating to our developments. The implementation, maintenance and monitoring of the controls together with non-compliance identification and investigation, will be undertaken by Persimmon, when acting as Principal Contractor, and records of these actions will be maintained in the Construction Phase Health and Safety Plan.

The Land, Technical and Construction Directors also have a responsibility to consider and review the potential environmental impact of the project on the broader natural environment and the built environment so that planned works have minimal impact in both areas.

## **12. Significant impacts and guidance information**

The matrix below outlines what we consider to be the most significant environmental impacts of the Persimmon Group along with a reference as to where additional information or guidance can be found. The references refer to the numbered items in the Construction and Generic Risk Assessment Safety Manual - Section 3 of the Health & Safety Policy & Procedures/

<b>Impact Area</b>	<b>Description of Impact</b>	<b>Source of Guidance</b>
<b>Air pollution</b>	<ul style="list-style-type: none"> <li>• Emissions from energy and fuel used in offices and vehicles.</li> </ul>	<ul style="list-style-type: none"> <li>• Fume Emissions (Section 3.12.3)</li> </ul>
<b>Archaeology</b>	<ul style="list-style-type: none"> <li>• Uncovering and/or disturbance of undiscovered archaeological remains.</li> </ul>	<ul style="list-style-type: none"> <li>• Contact construction director immediately for guidance</li> <li>• Damage to amenity and cultural heritage (Section 3 11.1.6)</li> </ul>
<b>Dust and Odours</b>	<ul style="list-style-type: none"> <li>• Dust created from demolition, crushing and excavation works; stock piling of loose materials (e.g. uncovered rubble); blowing out of concrete pipes; clearing top soil; site access (e.g., heavy vehicles travelling off road); and mixing of dry powders, such as plaster.</li> <li>• Odours from vehicles left with engines running.</li> </ul>	<ul style="list-style-type: none"> <li>• Dust (Section 3.12.1)</li> <li>• Fume Emissions (Section 3.12.3)</li> </ul>
<b>Ecology</b>	<ul style="list-style-type: none"> <li>• Inadvertent destruction of places inhabited by plants and animals.</li> <li>• Interruption of wildlife movements.</li> <li>• Fragmentation of the habits e.g., by features such as roads.</li> <li>• Removal of hedgerows and other vegetation.</li> <li>• Disturbance of wildlife (e.g., noise, vibration etc).</li> </ul>	<ul style="list-style-type: none"> <li>• Hedges and trees (Section 3.12.10)</li> <li>• Wildlife habitats (Section 3.12.11)</li> </ul>
<b>Energy and fuel use</b>	<ul style="list-style-type: none"> <li>• Energy used in offices for lighting, heating, and air conditioning</li> <li>• Motor Fleet fuel consumption</li> <li>• Energy and fuel used on site to power plant.</li> </ul>	<ul style="list-style-type: none"> <li>• Contact Group Company Secretary for further information or guidance.</li> </ul>

<b>Demolition and ground contamination</b>	<ul style="list-style-type: none"> <li>• Disturbance of previously contaminated ground.</li> <li>• Windblown dust from loading vehicles or transportation.</li> <li>• Stockpiling of contaminated spoil or earth (that may leach contaminants) on clean soil.</li> <li>• Spillages of chemicals, diesel or oils.</li> <li>• Discharging of contaminated water into nearby watercourses.</li> </ul>	<ul style="list-style-type: none"> <li>• Pre- contract plan (Section 3.9.1)</li> <li>• Demolition phase (Section 3.9.2)</li> <li>• Hazardous materials or conditions (Section 3.12.6)</li> <li>• Asbestos (Section 3.12.7)</li> <li>• Waste Water and Ground Water (Section 3.12.12)</li> <li>• Group Waste Management Policy (see item 13 of this document)</li> </ul>
<b>Noise</b>	<ul style="list-style-type: none"> <li>• Loud noise generated from general operation of sites, particularly piling, pneumatic tools, demolition and earthmoving.</li> <li>• Irregular or tonal noises such a reversing warnings, vehicle movement radios, shouting etc.</li> </ul>	<ul style="list-style-type: none"> <li>• Noise Emissions (Section 3.12.4)</li> </ul>
<b>Storage and use of fuel and chemicals</b>	<ul style="list-style-type: none"> <li>• Use and storage of fuel, oils, solvents, paints, varnishes and other chemicals on site during construction</li> <li>• Pollution of watercourse through spillage, mishandling or poor storage.</li> </ul>	<ul style="list-style-type: none"> <li>• Control of substances hazardous to health (Section 3 7.0)</li> <li>• Fuels, Oils and Other Fluids Stored or Used on Site (Section 3.12.2)</li> </ul>
<b>Suppliers</b>	<ul style="list-style-type: none"> <li>• Indirect impact on the environment through the behaviour of suppliers who source or manufacture the products we use.</li> </ul>	<ul style="list-style-type: none"> <li>• Refer to the Persimmon Supplier Principles. For further information contact Group Company Secretary.</li> </ul>

<b>Transport and traffic management</b>	<ul style="list-style-type: none"> <li>• Emissions from company car and vehicle fleet.</li> <li>• Indirect emissions from supplier's vehicle delivering materials to site and visitors.</li> <li>• Noise from vehicles on site.</li> </ul>	<ul style="list-style-type: none"> <li>• Traffic Management Plan (Section 3.9.3)</li> </ul>
<b>Vibration</b>	<ul style="list-style-type: none"> <li>• Excessive vibration caused by piling or demolition activities.</li> <li>• Low level vibration caused by site plant and equipment.</li> </ul>	<ul style="list-style-type: none"> <li>• Vibration Levels (Section 3.12.5)</li> </ul>
<b>Waste and materials</b>	<ul style="list-style-type: none"> <li>• General office waste.</li> <li>• Waste generated on construction sites from materials and their associated packaging.</li> <li>• Demolition waste created on site, including the creation of some special wastes such as acids and alkalis (used in brick masonry cleaners), asbestos, lead compounds (used in some paints), solvents (used in paint and thinners) and tarry materials.</li> </ul>	<ul style="list-style-type: none"> <li>• Group Waste Management Policy (See item 13 of this document)</li> <li>• The Environmental Protection (Duty of Care) Regulations (Section 3.13.0)</li> <li>• Hazardous materials or conditions (Section 3.12.6)</li> <li>• Asbestos (Section 3.12.7)</li> </ul>

<b>Water Pollution</b>	<ul style="list-style-type: none"> <li>• Spillage of chemicals, diesel and other oils.</li> <li>• Contamination of ground waters through penetrative operations – e.g. piling, deep excavations.</li> <li>• Dewatering resulting in local subsidence and introduction of pollutants.</li> <li>• Run-off from disturbed ground into watercourses.</li> <li>• Direct disturbance or alteration of watercourses through works.</li> <li>• Pollution of watercourse through equipment washing</li> </ul>	<ul style="list-style-type: none"> <li>• Waste Water and Ground Water (Section 3.12.12)</li> <li>• Work On or Near Watercourses (Section 3.12.14)</li> </ul>
<b>Water use</b>	<ul style="list-style-type: none"> <li>• Water used at offices in kitchens, washrooms, vending machines and air conditioning systems.</li> <li>• Water used on site during construction processes e.g. mixing mortar etc</li> </ul>	<ul style="list-style-type: none"> <li>• Contact Group Company Secretary for further information or guidance.</li> </ul>

### 13. Waste management and recycling

The Group has identified the area of waste production and subsequent management and recycling as one of the Group's main Key Performance Indicators.

The Group's policy is designed to be flexible and to allow waste segregation on site to take place on suitable developments and alternative methods to be used on smaller restricted sites.

It is expected that the Group's waste management policy will be introduced by all Group operating businesses during 2005. Further refinement in respect of segregation methods, recycling and waste production will be considered for amendment in 2005 and beyond by the CSR Committee as and when required.

Monitoring and subsequent reporting of the success of the operations in terms of cost and recycling are vitally important in this procedure to enable the Group to record progress and be able to report in the annual CSR Report. Due consideration needs to be made by each operating business in respect of the contractors chosen. Only those that can manage and report on waste transactions will be employed.

The Group's policy on waste management and recycling is to primarily reduce the amount of waste produced on each and every site, to maximise waste segregation and recycling and as a result reduce to a minimum the amount of waste sent to land fill.

#### **14. Dealing with waste management contractors**

Due to the requirement for accurate reporting of all our operating businesses waste transactions, only reputable waste management contractors will be used who have a proven track record in waste management and who have access to licensed facilities for disposal and recycling.

The Waste Management Contractors chosen must be able to report to the business on a monthly basis with details of the following:-

- Number of skips for each waste category
- Equivalent tonnage from each site for each waste category
- Cost per skip / waste category
- Total Cost per site

They must also be able to provide to the business a schedule of the quantities of material that have actually been recycled or sent to landfill. If waste material has been recycled the waste management contractor must provide details of what use the material has been put to for each of the categories noted above.

#### **15. Environmental incidents and emergency procedures**

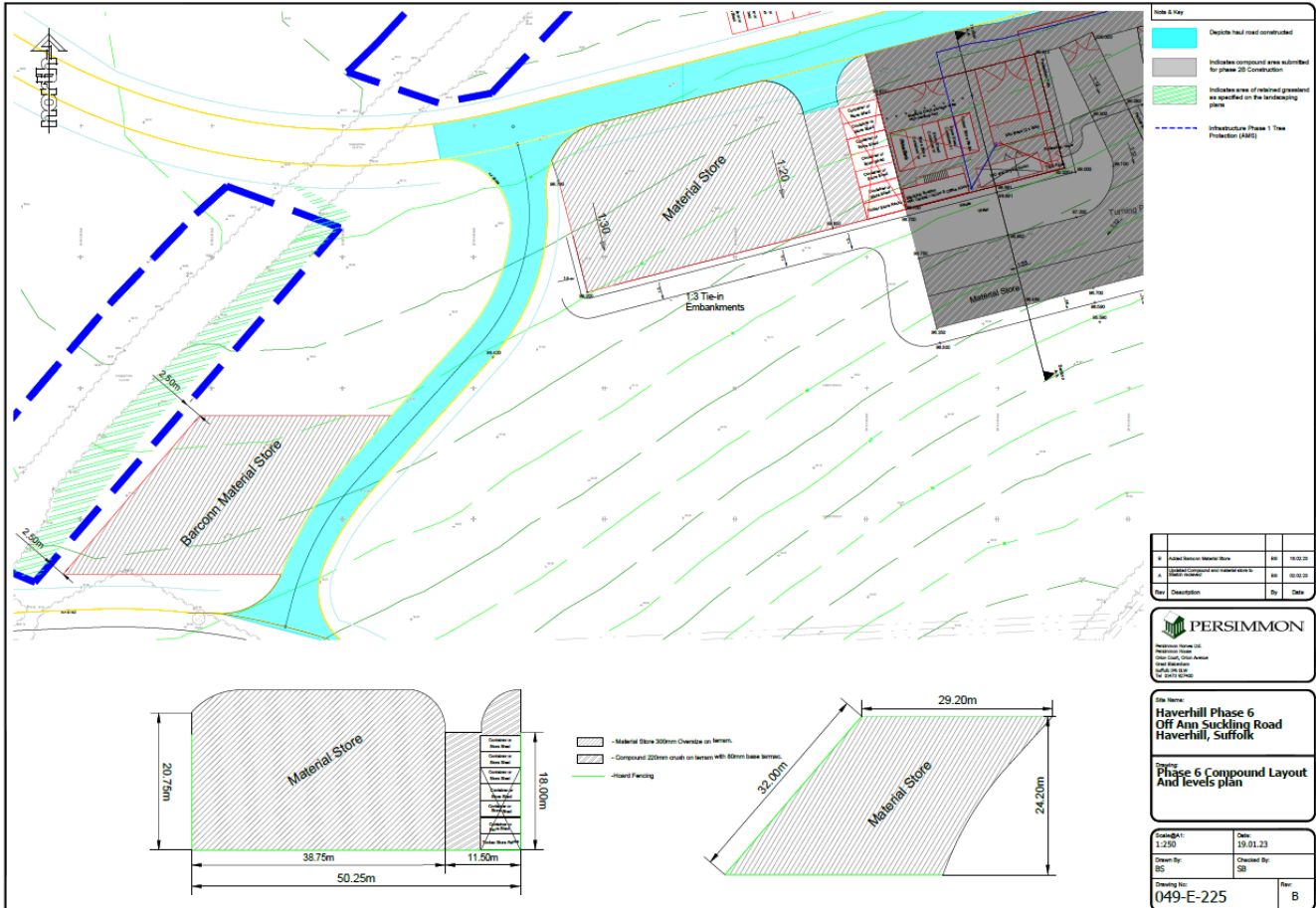
It is essential that all employees are aware of environmental incident procedures on a site and that these are adhered to. Environmental incidents must be reported on the Environmental Incident Report PHG/HS/031 (Section 3 Appendix B). This is particularly important in the case of pollution incidents and where quick and effective action can significantly reduce the damage that such an event may cause, as well as minimise the costs and impacts associated with the subsequent clear up operations.

In the case of an environmental incident occurring the Managing Director of the operating business and Group Health and Safety Director must be informed within 24 hours.

Guidance on the identifying and dealing with of an environmental incident and emergency procedures can be found in Section 3.11.

## Appendix 2 – Compound Plan

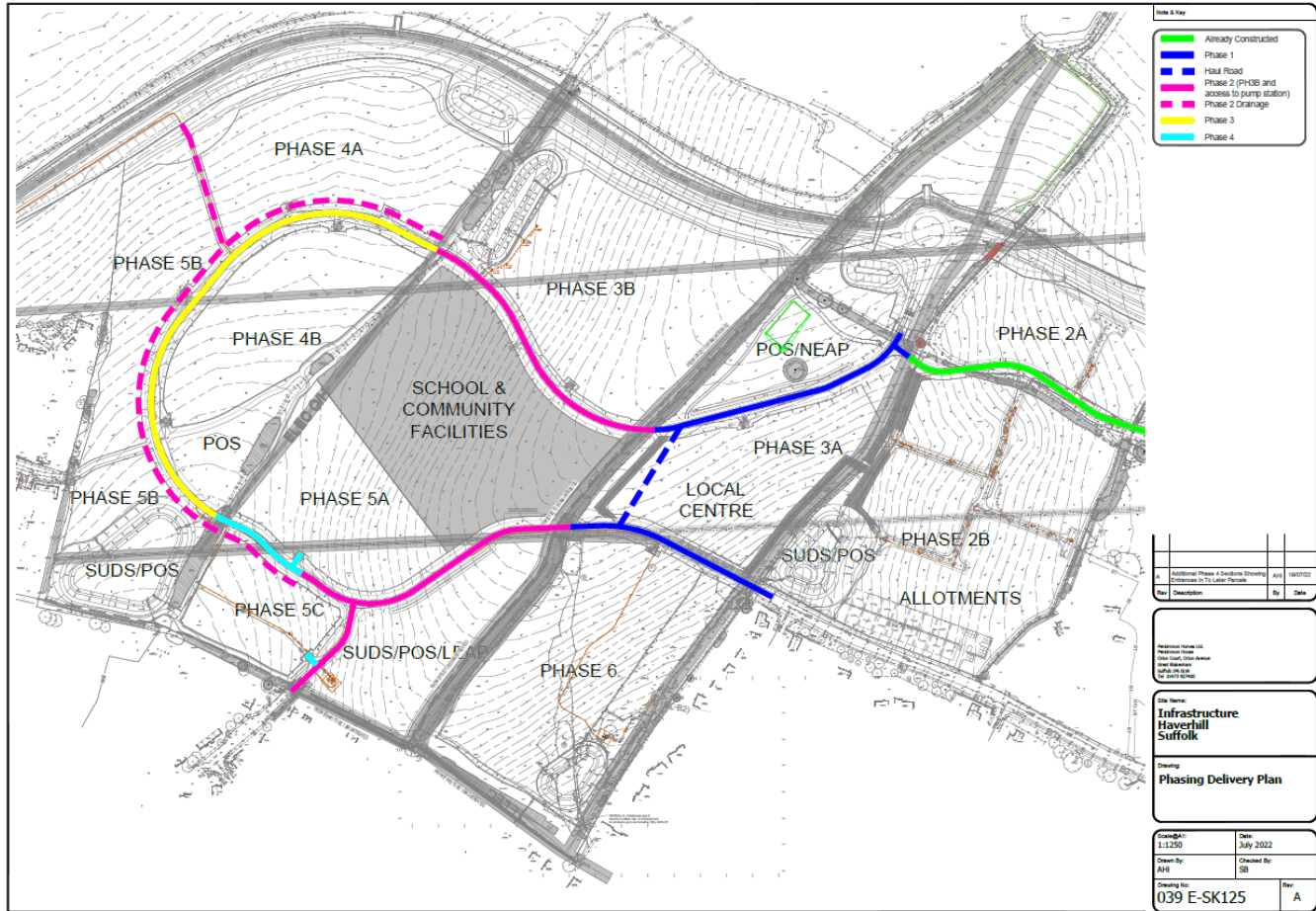
Please see document plan titled: 049-E-225 B Compound Location Plan





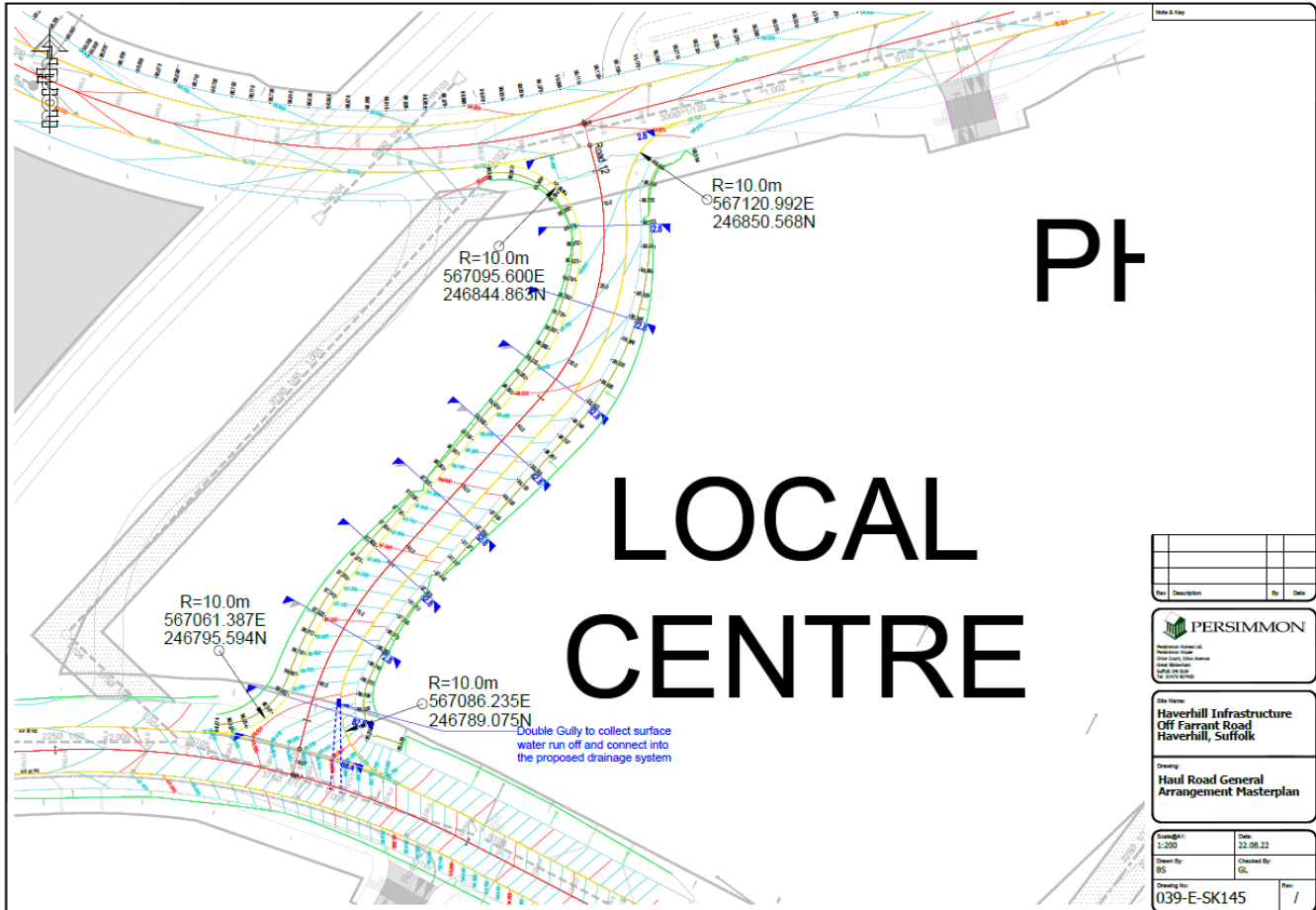
## Appendix 3 – Phasing Delivery Plan

Please see document plans titled: 039 E-SK125



**Appendix 4 – Haul Road details**

Please see document plans titled: 039-E-SK145



## Appendix 5 – Wheel Washing details

Please see document plans titled: 039-E-470

