



## Environmental Policy

### Contents

.....	1
Contents.....	1
1 Background .....	3
2 Plan, Do, Check, Act Model.....	3
3 Commitment.....	4
4 Environmental Design.....	4
4 Planning of Construction Site Activities.....	5
5 Design Life.....	5
6 Adaptability.....	5
7 Location.....	5
8 Energy .....	6
9 Water .....	7
10 Waste .....	7
11 Materials .....	7
12 Definitions.....	7
13 Environmental Risk Assessment .....	8
13.1 General Standards .....	8
13.2 Site Visit .....	8
13.3 Estimating risk assessments .....	8
13.4 Planning of Construction Site Activities – Design Risk Assessments.....	9
13.5 Environmental Surveys .....	9
13.6 Pre-construction Aspects/ Impacts Risk Assessment .....	9
13.7 Contractors and Suppliers .....	11
13.8 Work Practices .....	11
13.9 Waste .....	11
13.10 Planning of Construction Site Activities.....	12
13.11 Site Waste Management Plans (SWMPs).....	13
13.12 Waste Disposal Sites .....	13
13.13 Contractors and Suppliers .....	14
13.14 Work Practices.....	14

13.15 Waste Storage and Handling .....	14
13.16 Disposal to Landfill .....	15
13.17 Records of Waste Transfer, Carriage and Disposal to Landfill .....	15
13.18 Noise .....	16
13.19 Planning of Workplace Activities .....	16
13.20 Contractors and Suppliers .....	16
13.21 Work Practices .....	16
13.22 Nuisance Management.....	17
13.23 Planning of Construction Site Activities.....	17
13.24 Avoid .....	18
13.25 Reduce .....	18
13.26 Control .....	18
13.27 Work Practices .....	18
13.28 Environmental Noise and Vibration .....	18
13.29 Dust and Odour.....	19
13.30 Visual Impact and Light.....	19
13.31 Emergency Preparedness and Response .....	19
13.32 Spill Response Equipment .....	20

## 1 Background

Our ESG Policy and business strategy ensures that we constantly analyse, measure and manage the impacts that we as a company have on society and its environment. As a business, driven by our business model governance, we are focused on the investment in, and development of, shared wireless telecommunication infrastructure, this location sharing principle is we believe an important first step in reducing and improving impacts on environment and society. We analyse and set standards for our investment installations focused on efficiency of design and build, future site usage patterns, and long-term impacts on the community, Our business model and working practice is based on developing and maintaining long term positive relationships with our landlord partners, wireless operator tenants and the communities that surround the locations where our investments are made, and our stakeholders and investors. We ensure our employees and contractors partners understand our key principles of ethics, and respect for human rights.

Achieving a balance between the environment, society and the economy is considered essential to meet the needs of the present without compromising the ability of future generations to meet their needs. Sustainable development as a goal is achieved by balancing the three pillars of sustainability. Societal expectations for sustainable development, transparency and accountability have evolved with increasingly stringent legislation, growing pressures on the environment from pollution, inefficient use of resources, improper waste management, climate change, degradation of ecosystems and loss of biodiversity.

## 2 Plan, Do, Check, Act Model

The basis for the approach underlying an environmental management system is founded on the concept of Plan-Do-Check-Act (PDCA). The PDCA model provides an iterative process used by organizations to achieve continual improvement. It can be applied to an environmental management system and to each of its individual elements. It can be briefly described as follows.

- Plan: establish environmental objectives and processes necessary to deliver results in accordance with the organization's environmental policy.
- Do: implement the processes as planned.
- Check: monitor and measure processes against the environmental policy, including its commitments, environmental objectives and operating criteria, and report the results.
- Act: take actions to continually improve.

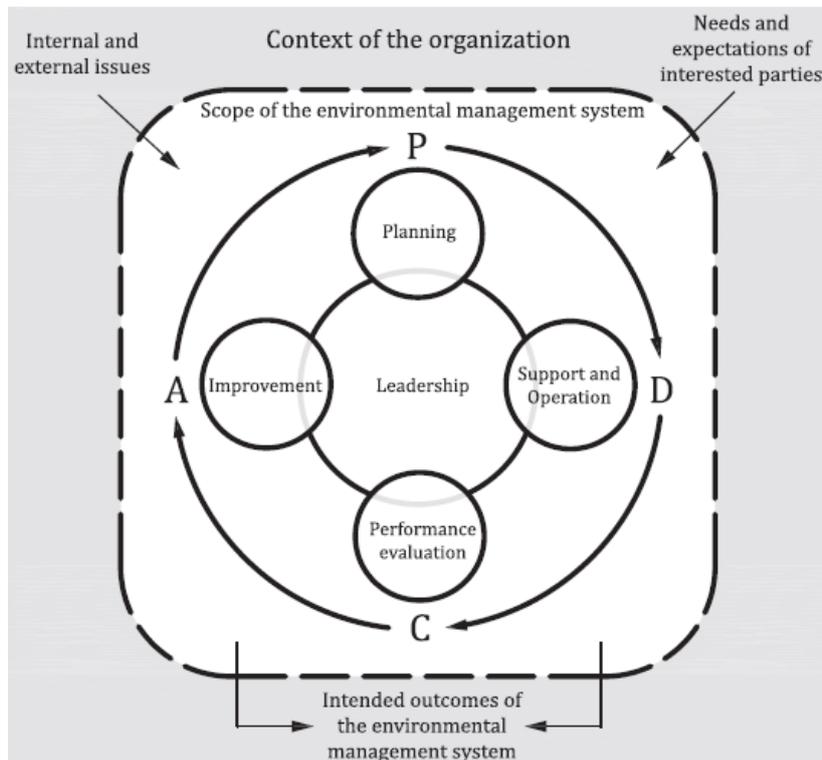


Figure – Relationship between PDCA and ISO14001:2015 standard

Source ISO14001:2015 International Standard

### 3 Commitment

Shared Access are committed to promoting the conservation and suitable use of natural resources, to preventing environmental pollution and to promote energy efficiency in all its own activities and those of its subcontractors and suppliers.

To achieve a high standard of environmental performance on our projects and related operations, we are committed to operating and maintaining an Environmental, Management system.

### 4 Environmental Design

The consideration of environmental issues into the design process is fundamental in achieving our sustainable development commitments; consequently, the following standards should be adopted whenever a consultant, company or organisation is employed by the Company to develop a project design.

Any consultant, company or organisation employed by the Company to prepare a design should review the completed Environmental Site Visit Checklist; contract documentation (including the design brief); outputs from any tender / estimating risk assessments; and any survey works (e.g., Ground Investigation surveys; ecological surveys) that have been conducted, to enable potential environmental risks and / or opportunities at the design stage to be identified and documented.

Thereafter, any consultant, company or organisation employed by the Company to prepare a design should define and document the measures proposed to effectively manage the identified environmental risks and / or opportunities.

Any consultant, company or organisation employed by the Company to prepare a design should consider the adoption of best practicable environmental performance measures, as appropriate, throughout the design life of the project (i.e., construction, occupation, maintenance and demolition).

Additionally, any consultant, company or organisation employed by the Company to prepare a design should review and implement, where practicable, the use of “best available techniques” and whole life costing approaches to ensure designs:

- Are efficient in their use of natural resources
- Consider wider global environmental responsibilities for resource use waste reduction
- Nurture positive enhancement for users and the wider community.

Any consultant, company or organisation employed by the Company to prepare a design should propose, where appropriate, environmentally beneficial design solutions for Clients’ consideration.

## 4 Planning of Construction Site Activities

Any consultant, company or organisation employed by the Company to prepare a design should ensure that the project design complies with statutory regulatory requirements as well as considering the guidance provided below.

## 5 Design Life

Where applicable, Design Teams should apply whole-life costing approaches to project designs i.e. investigating the financial and environmental life cycle costing to cover the capital and running costs for the design, build and life of the project

Furthermore, when requested by clients the Company should attempt to achieve the following:

- A “Very Good” EcoHomes rating (*predominantly Housing Division*)
- A “Very Good” BREEAM rating (*predominantly Housing / Building Division*)
- A “Very Good” CEEQUAL rating (*predominantly Infrastructure Division*).

## 6 Adaptability

Where applicable and within commercial constraints, Design Teams should attempt to optimise building adaptability (i.e., its ability to change) to maximise potential occupancy over the design life. Specifically, Design Teams should consider, within commercial constraints, the:

- Extent to which a building can support the needs of the customer without requiring major or frequent refurbishment and upgrading
- Ease with which a building can support the requirements of different users with minimal refurbishment.

## 7 Location

Design Teams should consider the impacts and implications to the environment surrounding the proposed project location to ensure that any potential adverse impacts are minimised as much as practically possible. Specifically, Design Teams should, where applicable, consider:

- Agriculture and forestry. Designs should minimise the impact on agricultural and forestry resources.
- Air quality. Designs should minimise the impact of airborne emissions during construction and operational phases on the environment, people and businesses.
- Community and socio-economic effects. Designs should avoid any adverse impact during construction and operational phases on people, their employment and the communities in which they live.
- Contaminated Land. Designs should minimise the requirement for disturbance, removal or disposal of contaminated land.
- Cultural Heritage. Designs should avoid disturbance, damage or disruption to known cultural heritage assets.
- Ecology. Designs should minimise the impact during construction and operational phases on ecological resources. Additionally, designs should incorporate measures to enhance local ecological resources and support, where applicable, BAPs (i.e., Species Action Plans, Habitat Action Plans and Local Biodiversity Action Plans).
- Landscape and Visual. Designs should avoid any adverse impact on character of local landscapes and townscapes as well as opportunities for the reuse and / or recycling of spoil.
- Noise and Vibration. Designs should minimise the impact of construction and operational noise and vibration on sensitive receptors.
- Surface and Groundwater. Designs should minimise the impact of construction and operational phases on controlled waters.
- Traffic and Transport. Designs should avoid any adverse impact during construction and operational phases upon local traffic, pedestrians and other users of roads, footpaths, bridleways and byways.

## 8 Energy

Design Teams should maximise the energy efficiency of the project, within commercial restrictions, by ensuring conformance with relevant statutory regulatory requirements (i.e., Part L of the Building Regulations) and by addressing energy efficient considerations associated with:

- Building Design
  - Orientation
  - Location
  - Building fabric characteristics e.g., optimising insulation levels.
- Services Design i.e., mechanical and electrical
  - HVAC efficiency
  - Natural ventilation
  - Heating systems e.g., air source heat pumps
  - Artificial lighting
  - Recycling / heat recovery ventilating systems.
- Activity
  - Occupancy patterns
  - Desired comfort patterns (i.e., heating, cooling and ventilation)
  - Desired lighting and noise levels and time switch controlled.

Furthermore, Design Teams should consider the use of, when practicable and within commercial constraints, renewable energy sources, for example:

- Ground Source Heat Pump / Cooling
- Biomass Heating
- Micro Combined Heat and Power (CHP)
- Solar Water Heating
- Photovoltaics (rooftop & cladding)
- Wind Turbines.

## 9 Water

When practicable, Design Teams should consider opportunities to optimise the efficiencies with which water is used and managed, by consideration of:

- Water Conservation Technologies
  - Use of water efficient fittings and appliances
  - Use of rainwater collection systems for reuse purposes
  - Use of grey water recycling technologies for secondary uses e.g., flushing toilets.
  - Sustainable Drainage Systems (SuDs)

To effectively manage surface water run-off that might otherwise cause flooding and / or watercourse pollution

## 10 Waste

When applicable, Design Teams should consider opportunities to reduce the quantities of waste requiring landfill or incineration, by:

- Contributing to the development of Site Waste Management Plans
- Integrating opportunities for solid waste storage and segregation into building designs for occupation and use phases to increase the recycling potential.

## 11 Materials

Design Teams and buyers should, wherever feasible, specify the use of construction materials that have a low environmental impact. Specifically, Design Teams should consider:

- Specifying the use of low environmental impact materials (e.g., using A-rated specifications from the BRE Green Guide to Housing Specification)
- Specifying, wherever practicable, the use of local materials and products
- Specifying that timber is sourced from plantations that are approved by the Forestry Stewardship Council (FSC) or Pan European Forestry Council (PEFC)
- Using reprocessed and recycled components and materials (e.g., secondary aggregates)
- Using durable materials and products

Using building materials that can be recovered, reused and / or recycled.

## 12 Definitions

BAP	Biodiversity Action Plan
BREEAM	Buildings Research Establishment Environmental Assessment Method
CEEQUAL	Civil Engineering Environmental Quality Assessment & Award Scheme
Controlled Waters	Almost all-natural water bodies in England, Scotland and Wales are controlled waters e.g., rivers, streams, lochs, ditches, canals, burns, ponds and groundwater / soakaways
HVAC	Heating, Ventilation and Air Conditioning

## 13 Environmental Risk Assessment

### 13.1 General Standards

There are key processes employed by the Company to identify and assess environmental risks associated with project activities namely:

- Conducting an initial site visit
- Estimating environmental risk assessments
- Conducting design risk assessments
- Conducting environmental surveys (e.g., geological surveys)
- Conducting a pre-construction aspects / impacts risk assessment.

Not all these risk assessment processes are required on each project; however, conducting a pre-construction aspects / impacts risk assessment should be conducted for all projects.

### 13.2 Site Visit

Site visits should be conducted for all projects to identify the initial environmental risks by using the Environmental Site Visit Checklist.

### 13.3 Estimating risk assessments

Environmental risks and opportunities are identified

In identifying and assessing the project environmental risks and opportunities the business will focus upon:

- Potential to breach environmental legislation
- Potential to pollute the environment
- Potential environmental liability to the Company.

Environmental risks and opportunities, when evident, as well as actions to address these issues should be documented to ensure that the identified risks and opportunities can be effectively dealt with during the planning stages of the project.

### 13.4 Planning of Construction Site Activities – Design Risk Assessments

Where design activities come under the direct control of the Company, the Design Team should review the Environmental Site Visit Checklist; contract documentation (including the design brief); outputs from any tender / estimating risk assessments; and any survey works that have been conducted to identify, reduce or eliminate any significant environmental risks.

Due to the variance in the scope of the design function no prescriptive Company environmental design process or tool is defined. However, Design Teams should define and document any identified Environmental risks and opportunities as well as the measures proposed to affect their effective management.

### 13.5 Environmental Surveys

Where identified as being necessary, the Company should ensure that the appropriate environmentally related surveys are conducted to further define and refine the level of environmental risk evident, for example:

- General environmental walk-over surveys
- Topographical surveys
- Flood risk assessments
- Ecological surveys – floral and faunal
- Traffic impact assessments
- Archaeological reviews and surveys
- Geotechnical surveys – including contaminated land
- Noise surveys

### 13.6 Pre-construction Aspects/ Impacts Risk Assessment

Operations Management Teams should ensure that the environmental risks associated with the construction phase of the project are identified prior to site works commencing.

To achieve this, the Management Team should ensure that the Environmental Risk Register and, when relevant, the Environmental Risk Action Plan are completed.

To enable this to be achieved the following should be reviewed:

- Contract documentation and / or design brief
- Environmental Site Visit Checklist
- Environmental design risk assessments
- Results of external surveys
- Discussions.

To complete the Environmental Risk Register, the Management Team should assess the risks associated with each relevant 'Activity' defined on the Register against the pertinent 'Environmental Aspect' In

assessing whether the risk is Low, Medium or Significant use should be made of the Probability table below

<b>Probability</b>	
1	Improbable
2	Unlikely
3	Occasional Chance
4	Likely
5	Certain to Occur

Having assigned a Probability and Severity rating to each an assessment of the overall inherent environmental risk should be determined with the use of the following risk matrix.

		<b>SEVERITY</b>				
		1	2	3	4	5
<b>PROBABILITY</b>	1	1	2	3	4	5
	2	1	2	3	4	5
	3	1	2	3	4	5
	4	1	2	3	4	5
	5	1	2	3	4	5

Low	Low
Medium	Medium
Significant	Significant

Where there is a potential to breach environmental legislation in relation to an environmental aspect then a 'Medium' or 'Significant' risk rating must be applied.

Once all relevant environmental risks have been assigned and recorded within the Environmental Risk Register a corresponding Environmental Risk Action Plan should be completed by the Management Team, which defines the controls to be used to effectively manage the identified the "Significant" and / or "Medium" environmental risks.

For each instance that a "Significant" and / or "Medium" risk is identified in the Environmental Risk Register it is compulsory for an associated method of control to be defined within the Environmental Risk Action Plan. The resultant methods of control for each risk rating are as follows:

<b>Identified risk</b>	<b>Action</b>
Significant	Development of an Environmental Risk Action Plan, and / or development & implementation of site-specific method statement(s).

Medium	Development of an Environmental Risk Action Plan, and / or development & implementation of site-specific method statement(s).
Low	No specific management control action(s).

Additionally, where “Significant” and / or “Medium” risks are identified the requirements of the relevant HS&E Standard should be adopted (as defined within the Environmental Risk Register) to manage that risk.

### 13.7 Contractors and Suppliers

The Management Team should ensure that risk assessments submitted by contractors include an environmental component, where relevant. Thereafter, contractor risk assessments should be evaluated and formally approved by the Operations Management Team who should ensure that the environmental component addresses the following:

- Emissions to air
- Releases to water
- Releases to land
- Use of raw materials and natural resources
- Use of energy
- Energy emitted e.g., heat, radiation, noise, vibration
- Waste and by-products
- Potential emergency situations, and
- Control measures to manage identified environmental risks.

If the environmental component of the risk assessment is assessed as being weak then the contractor(s) should be advised that amendments are required, and that work should not commence until a satisfactory response has been received.

Contractor risk assessments that include an environmental component should be reviewed by the Management Team as changes in the work processes are identified or at monthly intervals, whichever is sooner.

The Management Team should ensure that risk assessment reviews are recorded to ensure all current risks (including environmental risks) are identified and that suitable, adequate and effective control measures are implemented.

### 13.8 Work Practices

The Management Team should ensure the Environmental Risk Register and the Environmental Risk Action Plan are formally reviewed on a monthly basis throughout the duration of the project to take account of changing circumstances and to ensure that suitable, adequate and effective control measures remain in place.

### 13.9 Waste

There are a wide range of waste types, many of which have the potential to cause pollution if they are ineffectively controlled and they escape. There are additional potential liabilities with wastes that relate to their off-site transport and disposal which, if not done correctly and in accordance with the statutory provisions, could lead to both environmental impairment and criminal liabilities.

There are essentially three types of waste that are produced from our activities:

*Inert Waste* is effectively, but not entirely, uncontaminated soils and stone, ceramics, concrete, masonry and brick rubble, minerals etc.

*Non-Hazardous Waste* is effectively, but not entirely, wood and other organic materials, plastics, paper, cardboard etc.

*Hazardous Waste* is effectively any substance listed as hazardous in the List of Wastes regulations 2005 e.g. oils and chemicals that are used on construction sites, including waste oils, oily sludges, sealants, pesticides, wood preservative, paints, contaminated packaging and containers, batteries and asbestos.

*Special Waste* is a term used only in Scotland to describe wastes that are hazardous as defined by the Hazardous Waste Directive i.e., substances that are marked with an asterisk in the European Waste Catalogue.

The Company retains a number of waste brokers and waste carriers licences that should be regularly updated by the Business Unit that retains the licence. Business Unit personnel should contact management for assistance should additional waste brokers and waste carriers licences be required or amendments to existing licences be needed.

During completion of the Environmental Site Visit Checklist Operations Management Teams should conduct an initial assessment as to whether:

- There is any dumped or fly-tipped wastes on the proposed construction site.
- There is any evidence of any residual biological agents e.g., pigeon droppings or rodents.
- Significant amounts of waste i.e., inert, non-hazardous or hazardous (or Special in Scotland) are likely to be produced.
- There is sufficient space available for effective segregation of the anticipated waste streams.
- Where there is a potential for construction activities to generate significant amounts of waste.

Management Teams should ensure that relevant commercial provisions are established during the identification of environmental risks and opportunities conducted during the initial stages of the project.

### 13.10 Planning of Construction Site Activities

Where risk assessments and consultations determine that construction wastes are to be generated, the Management Team should define and document suitable, adequate and effective mitigation control measures the Management Teams should adopt the following waste hierarchy in the development of appropriate mitigation control measures (that may be contained within a Site Waste Management Plan to reduce the amount of waste sent to landfill as well as reducing waste disposal costs:

**Reduce.** Adopting site practices that reduce the potential to generate waste e.g., secure storage of raw materials and avoidance of over ordering practices

**Reuse.** Using a product or material more than once in its original form, for its original purpose or for an alternative, with or without reconditioning e.g., reusing wood pallets or returning empty toner cartridges

**Recycle.** Recovering value from a product or material that would otherwise be discarded e.g., use of secondary aggregates or chipping plant matter for landscaping purposes.

**Disposal.** Discarding wastes either by incineration or landfilling.

Prior to undertaking the reuse or recycling of a waste generated during construction activities (including arising's), the Management Team should consult with the environmental advisor and Natural Resources Wales / Environment Agency / Scottish Environment Protection Agency at the earliest opportunity, as to the need for a waste management licence or waste management licence exemption.

### 13.11 Site Waste Management Plans (SWMPs)

All projects of significant value should complete a SWMP. During the development of a SWMP, the Management Team should ensure that:

- Design teams address opportunities for reducing waste disposal as well as optimising material reuse and the use of secondary and recycled materials.
- Material procurement practices are effectively addressed e.g., ordering correct material quantities to avoid wastage and packaging is reduced or recycled.
- Proposed waste contractors hold valid waste brokers and / or waste carriers licenses' by accessing the Environment Agency's public registers database.
- When selecting waste contractors, consideration is given to their past environmental track record e.g., previous environmentally related prosecutions.
- Proposed disposal locations are legally allowed to accept the waste being produced.
- Specialist contractors are used to remove hazardous waste streams.
- Waste management licence exemptions are obtained if waste materials are brought on site for reuse purposes or are being removed from site to be reused at another site and that all conditions of the exemption are met.
- Copies of relevant waste management licence exemptions are retained.

### 13.12 Waste Disposal Sites

The Management Team should ensure that facilities being proposed for disposal or treatment of the Company wastes are properly licensed or are legally exempt to accept those wastes. This may be achieved by obtaining a copy of the disposal sites' PPC permit, waste management licence or exemption to ensure that the facility is licensed to accept the specified waste types and quantities being generated.

#### *Site Notification (England)*

Sites that produce more than 200kgs of hazardous waste in a twelve-month period should register (notify) with the Environment Agency before the waste is produced. The Operations Management Team should ensure that any site producing more than 200kgs of hazardous waste per year is registered. Each site manager should ensure that any Company managed office producing more than 200kgs of hazardous waste per year is registered.

Where sites / offices have been registered as a hazardous waste producer then these notifications should be renewed annually with the Environment Agency, if hazardous wastes are still being produced.

#### *Site Notification (Wales)*

All sites that produce hazardous waste should register (notify) with Natural Resources Wales before the waste is produced. The Management Team should ensure that any site producing hazardous waste is

registered. Each site manager should ensure that any Company managed office producing over 200kgs of hazardous waste per year is registered.

Where sites / offices have been registered as a hazardous waste producer then these notifications should be renewed annually with Natural Resources Wales, if hazardous wastes are still being produced.

#### *Pre-Notification (Scotland)*

The Operations Management Team should ensure that Scottish Environment Protection Agency are given at least 72 hours pre-notification of a shipment of special waste from site. Repetitive movement of the same type of special waste to the same disposal location do not require to be pre-notified after the first shipment of waste; however, a new pre-notification is required after 12 months.

### 13.13 Contractors and Suppliers

Throughout project activities, no contractor may use Company waste storage facilities without permission from the Management Team.

Whenever a contractor disposes of waste or uses a non-Company appointed waste disposal contractor whilst working on a Company managed site, the Operations Management Team should:

- Verify the validity of the relevant waste brokers / carriers licence(s)
- Verify that wastes are to be deposited at facilities licensed to take that type and quantity of waste
- Ensure transfers of non-hazardous waste are made using a Company Controlled Waste Transfer Note.
- Retain copies of completed hazardous (or Special in Scotland) waste consignment notes
- Ensure a waste management licence exemption is obtained, where relevant e.g., for waste materials incorporated back onto land such as subsoil or topsoil taken by a local farmer.

The Management Team should ensure that relevant requirements of this standard are communicated to contractors as being mandatory requirements.

### 13.14 Work Practices

The Management Team should ensure waste produced and stored on-site is:

- Adequately identified and described (i.e., labelled)
- Appropriately segregated and stored
- Transferred to appropriate persons (both transport and disposal)
- Appropriately treated and / or disposed.

### 13.15 Waste Storage and Handling

On all Company sites, the Management Team should ensure that wastes are kept safely and appropriate actions are taken to prevent wastes from being discharged to the external environment. The Management Team should adopt all appropriate control measures to assure the environmentally responsible storage of waste, which may include:

- Storage in designated areas
- Provision of good quality waste containers

- Protection of waste containers from damage
- Location of waste containers away from surface / foul drains and watercourses
- Provision of adequate bunding i.e., waste oils in Scotland require 110% bunding
- Secured waste containers
- Labelled waste containers i.e., labels that specify their contents.

The Management Team should ensure wastes are appropriately segregated according to their reactive characteristics and, as a minimum, non-hazardous and hazardous wastes should be segregated.

All containers used to store waste must be regularly inspected, as part of site inspections conducted by site personnel and Advisors, to ensure compliance with the above requirements.

### 13.16 Disposal to Landfill

The Management Team should ensure that any non-hazardous or inert wastes generated from a Company managed site that are to be sent directly to landfill (in England, Wales and Scotland) via a Company appointed or a non-Company appointed waste disposal contractor for disposal are treated. Additionally, a record of the type of treatment undertaken should be made within the Company Controlled Waste Transfer Note

### 13.17 Records of Waste Transfer, Carriage and Disposal to Landfill

A number of actions are required before waste can be removed from site and transferred to a third party. The Management Team should ensure:

- All transfers of non-hazardous / inert waste are made using a Company Controlled Waste Transfer Note.
- Copies of controlled waste transfer notes supplied by waste contractors are attached to the Company waste transfer note and retained for inspection.
- All transfers of hazardous (or Special in Scotland) waste are made by using a hazardous (or Special in Scotland) waste consignment note.
- Controlled waste transfer and consignment notes are completed correctly.
- Checks that disposal point is legally allowed to accept the waste and quantity being produced or is exempt from requiring a waste management licence.
- Checks on the validity of waste brokers and waste carriers should have been verified during the generation of a SWMP; however, any variance to those defined in the SWMP requires the Operations
- Management Team to verify the validity of their waste broker / carrier licence(s) i.e., through use of the Environment Agency public registers database.

If there is any doubt of the validity of the waste brokers / carriers licence, then the registration should be formally checked with the Environment Agency, Natural Resource Wales or Scottish Environment Protection Agency.

If multiple waste removals are required (i.e., series of wagon or skip loads) it is permissible to have one waste transfer note (season ticket) for all of the waste removals for a maximum period of 12 months. For this to be acceptable, the Management Team should ensure that the:

- Type of waste does not change between lifts

- Waste carrier does not change between lifts
- Waste disposal site does not change between lifts.

If any of the above changes then a new waste transfer note should be completed. The Management Team should ensure that copies of all waste transfer documentation, waste exemption notices and hazardous waste registrations are forwarded to the Client (when required).

Additionally, the Management Team should ensure that:

- Controlled waste transfer notes are retained for at least two years
- Any hazardous (or Special in Scotland) waste consignment notes that arise as a result of Company activities are retained for at least three years
- Copies of waste management licence exemptions are retained for three years.

### 13.18 Noise

The risks of noise induced hearing loss from workplace operations should be reduced by elimination or reduction of noisy operations by using appropriate control measures. Personal protective equipment should only be used where collective measures have been considered but are not reasonably practicable to use. Noise levels of all operations / equipment should be assessed and where significant noise levels are likely to be emitted during the work process a noise assessment should be recorded and appropriate control measures identified.

The risk of nuisance noise should be identified, and contact made with local environmental health departments and, where necessary, others who may be affected by the works.

### 13.19 Planning of Workplace Activities

The operations management team should identify the equipment / activities where there is likely to be significant noise level exposure for employees or other persons and record provisional measures to combat those risks. The initial sound level assessments should be recorded on a Noise Register and included in the Health and Safety Plan.

### 13.20 Contractors and Suppliers

Where significant noise sources cannot be eliminated and are identified in the Construction Phase Health and Safety Plan, relevant information should be passed on to supply chain members for inclusion and management of, within their planned safe working methods.

Where supply chain members may bring additional activities or equipment on to site not previously identified, they should provide suitable data on noise levels and reasonable control measures to ensure the health and safety of their own employees and others likely to be at risk.

Suppliers and hirers of plant and equipment should provide suitable data on noise levels generated and provide reasonable controls. All plant and equipment should be subject to planned maintenance schedules to maintain optimum noise performance.

### 13.21 Work Practices

Information from contractors and suppliers should be added to the site's Noise Register. Control measures identified in the workplace noise assessments should be briefed to operatives who are either using equipment with significant noise levels or may be affected by significant noise levels in the area they are working.

The management should, where possible, plan the operations on site to reduce noise levels and individuals exposure to as low as reasonably practicable. Collective controls should be used before reliance on the wearing of hearing protection. Where significant noise levels have been identified, suitable signage, information and control measures should be implemented in line with the controls identified on the risk assessment.

Management should monitor the controls and take action if they are not being complied with or are ineffective. The noise levels obtained should be based on real life data or credible measurements provided by the manufacturers, the hirers, the contractors or industry sources.

Where, after the implementation of controls, employees are exposed to noise levels between the lower and upper exposure action values, hearing protection should be available for employees who request it. If the noise levels are at or above the upper exposure values hearing protection should be issued and worn.

### 13.22 Nuisance Management

The purpose of this policy is to define the standards to be adopted to effectively manage construction activities to prevent adverse environmental nuisance impacts (i.e., noise, odour, dust, traffic, visual impact, vibration and light) upon sensitive environmental receptors (e.g., floral and fauna) and people as well as creating a positive relationship with potentially affected neighbours.

The Management Team should conduct an initial assessment as to whether construction activities are likely to have an adverse noise, odour, dust, traffic, visual, vibration or light impact upon:

- Local residents
- Local commerce
- Sensitive environmental receptors e.g., protected flora and / or fauna
- Protected and / or unprotected buildings e.g., Listed Buildings, Scheduled Ancient Monuments.

Where there is a potential for construction activities to have an adverse nuisance impact sensitive environmental receptor, people and / or buildings, the Operations Management Team should ensure that relevant commercial provisions are established during the identification of environmental risks and opportunities conducted during the initial stages of the project.

### 13.23 Planning of Construction Site Activities

Where there is a potential for construction activities to have a significant adverse noise, odour, dust, traffic, visual, vibration or light impact upon sensitive environmental receptors, people and / or buildings, the Management Team should:

- Establish baseline conditions (e.g., conduct pre-construction noise / dust monitoring, building, traffic or light surveys using competent person(s)) to allow for the:
  - Effective siting of plant and equipment
  - Effective routing of construction vehicles
  - Development of effective mitigation control measures, and to
  - Defend unsubstantiated complaints

- Obtain a Section 61 consent after consultation with the local authority.

Where risk assessments and consultations determine that there is a potential for construction activities to adversely impact sensitive environmental receptors, people and / or buildings from noise, odour, dust, traffic, visual, vibration or light impacts, the Management Team should ensure that suitable, adequate and effective mitigation control measures are defined and documented and implemented.

The Management Team should consider the following in the development of appropriate nuisance mitigation control measures:

#### 13.24 Avoid

Ensuring design and construction activities avoid creating an environmental nuisance e.g. using bored piles rather than driven piles.

#### 13.25 Reduce

Undertaking specific actions to reduce adverse impacts on sensitive environmental receptors, people and / or buildings e.g., using low noise plant and equipment, routing construction traffic away from sensitive receptors such as schools, hospitals and Listed Buildings.

#### 13.26 Control

Implementing mitigation actions to control any adverse impacts e.g., use of screening and acoustic enclosures. Furthermore, the Management Team should ensure that local residents and other potentially affected parties are contacted prior to the commencement of any construction work and kept updated, as necessary, throughout the project in order to build a positive working relationship and avoid any potential environmental nuisance related complaints.

#### 13.27 Work Practices

As soon as reasonably practicable after site mobilisation, the Operations Management Team should ensure that notice boards are erected at clearly visible location(s) that display the name of site representative and their telephone contact details to allow for the receipt of enquiries and environmental nuisance related complaints.

Any unplanned disturbance to sensitive environmental receptors, people and / or buildings resulting in the receipt of a complaint must be recorded and reported by the Management Team using the Environmental Incident Report Form. If the source of the nuisance complaint is determined to be unacceptable the activity resulting in the nuisance or disturbance should be stopped, as soon as reasonably practicable. If it cannot be stopped measures should be implemented to reduce the nuisance impact, as far as reasonably practicable.

#### 13.28 Environmental Noise and Vibration

Where a Section 61 consent is in effect the Management Team should ensure compliance with all consent requirements as well as ensuring that these requirements are communicated to all relevant site personnel and contractors. In the event a Section 60 notice is served, the Health, Safety and Environment Advisor should complete the Notification of Incident Report Form.

In the event that working hour restrictions, as defined within a Section 61 or planning consent, are likely to be breached as a result of planned construction activities, the Management Team should ensure that the local authority are notified in advance to avoid the potential for receipt of a Section 60 notice.

Where there is a potential for environmental noise to adversely impact sensitive environmental receptors, people and / or buildings, the Management Team should ensure that suitable, adequate and effective mitigation control measures are implemented. Environmental noise mitigation control measures that should be considered, dependent upon site circumstances.

Where there is a potential for vibration to adversely impact sensitive environmental receptors, people and / or buildings, the Operations Management Team should ensure that suitable, adequate and effective mitigation control measures are implemented. Vibration mitigation control measures that should be considered, dependent upon site.

### 13.29 Dust and Odour

Where there is a potential for dust or odour emissions to adversely impact sensitive environmental receptors, people and / or buildings, the Operations Management Team should ensure that suitable, adequate and effective mitigation control measures are implemented. Dust and odour mitigation control measures that should be considered, dependent upon site circumstances.

### 13.30 Visual Impact and Light

Where there is a potential for site activities to cause an adverse visual impact or cause a light pollution impact, the Operations Management Team should ensure that suitable, adequate and effective mitigation control measures are implemented. Visual impact and light pollution mitigation control measures that should be considered, dependent upon site circumstances.

Any persons engaged to conduct nuisance monitoring activities throughout construction and / or post construction activities should be competent and records retained to verify their competencies. Additionally, the Operations Management Team should ensure that records are retained to verify that environmental monitoring equipment used by either Company personnel or contractor personnel to verify environmental legislative compliance has been subject to routine and regular calibration activities.

### 13.31 Emergency Preparedness and Response

The process of preventing and minimising environmental impact(s) from potential environmental emergency scenarios is by:

- Identifying potential environmental emergency scenarios by completing the Environmental risk register
- Developing and implementing a Spill Response Plan
- Periodically testing the Spill Response Plan
- Ensuring suitable spill response equipment is always readily available, when there is a potential for a spill incident
- Displaying the Spill Response Plan to be prominent to all site personnel
- Providing appropriate levels of training to site staff and contractors
- Reporting and investigating any environmental emergency incidents that occur.

The Management Team should ensure that potential environmental emergency scenarios are identified prior to site works commencing by completing the Environmental Risk Register. Thereafter, the

Operations Management Team should implement all practicable control measures to mitigate the environmental impact(s) associated with the identified potential environmental emergency scenarios.

### 13.32 Spill Response Equipment

All Company construction sites are required to have appropriate spill response equipment located and maintained on site. The type and quantity of spill response materials to be retained on site is dependent upon the significance of the spill risk and the sensitivity of the surrounding environment. However, the Management Team should consider retaining, as a minimum, the following:

- Absorbent pads
- Booms
- Safety goggles
- Disposable gloves
- Disposal bags and ties
- Caution tape roll.