

Elev8 Interiors Ltd

Company Environmental & Sustainability Policy

2019

TABLE OF CONTENTS

	Environmental Philosophy Statement	3
1	Environment	3
2	Noise	4
3	Vibration	5
4	Hours of Working	6
5	Plant	6
6	Dust	7
7	Asbestos	8
8	Air Pollution	8
9	Contaminated / Hazardous Materials	9
10	Site Boundaries & Hoarding	9
11	Site Activities	10
12	Urban Ecology	11
13	Mature Trees	11
14	General	12
15	Synopsis of Legislation	12

Elev8 Interiors Ltd Environmental & Sustainability Philosophy Statement

The management and all who work at Elev8 Interiors are committed to the protection of the environment and the prevention of pollution.

The organisation is further committed to ensuring that all its activities are carried out in compliance with the relevant environmental legislation and non-legal compliance obligations.

The organisation seeks to minimise waste arising, promote recycling, reduce energy consumption, reduce harmful emissions and, where possible, to work with suppliers who themselves have sound environmental policies.

An essential feature of the environmental management system is a commitment to continual improvement of environmental performance. This is achieved by setting annual environmental improvement objectives and targets which are regularly monitored and reviewed. The objectives and targets are publicised throughout the organisation and all staff are committed to their achievement.

In order to ensure the achievement of the above commitments, the organisation has implemented an environmental management system which satisfies the requirements of ISO 14001:2015 and we are committed to its continual improvement.

This Policy and the obligations and responsibilities required by the environmental management system will be communicated to all employees and contractors working on behalf of the organisation.

Please also be aware that Environmental Management forms part of our Integrated Management System which conforms to ISO 9001 (Quality Management) and ISO 45001:2018 (Health & Safety) as well as ISO 14001:2015.

This Policy is available to the public on request and will be reviewed periodically to ensure its continuing suitability.

A handwritten signature in black ink, appearing to read "Jonathan", written over a dotted line.

Signed

Date27/02/2019.....

1 ENVIRONMENT

1.1 It is the Company policy to recognise, and wherever possible, to minimise any impact that it's suggested processes have on the environment and to comply with all environmental legislation.

1.2 Environment Considerations

- Dust will be controlled by vacuum cleaning where neighbours may be affected. Dust arising at source e.g. cutting operations will be retained by collecting hoses attached to the machine.
- Engines will be turned off when not required.
- Drains will be maintained and /or covered, especially road surface water drains.
- Waste, especially canteen waste will be disposed of promptly and kept in rodent proof bins until collection.
- Packaging will be returned or collected by suppliers wherever possible.
- Materials that are economic to recycle will be sent back or collected by suppliers.
- Transmitted noise from structural operations will be minimised and only allowed to commence/continue with neighbours permission. The Principal Designer is expected to have agreed this work with the neighbours in advance.
- Delivery vehicles that traverse the site will have tyres hosed down before leaving
- Chemicals producing obnoxious smells will be substituted wherever possible.

- Complaints or enquiries from neighbours will be logged and closed out promptly with a copy back to the neighbour.

1.3 Legal Compliance

- Making sure our subcontractors comply with the correct legislation (Toolbox Talks).
- A detailed design understanding all-encompassing impacts from transporting materials to material selection.

2 NOISE

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

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

2.3 Where appropriate the Local Council will be informed of the works in accordance with current

Legislation. The application will contain particulars of the works, work methods and details of the measures proposed to minimise noise nuisance resulting from the works in accordance with the current British Standard and relevant Environmental Legislation.

- 2.4 The Company will comply with the recommendations set out in the current Code of Practice for Noise Control on Construction, Demolition and Open Sites, Code of Practice for Basic Information and procedures for Noise Control, and Guide to Noise Control Legislation for Construction and Demolition.
- 2.5 While it is recognised that the current British Standard, Method of Rating Industrial Noise Affecting Mixed Residential and Industrial Areas, is not applicable to construction works, the philosophy of this document may be referred to in assessing degrees of nuisance.
- 2.6 Before the commencement of the works at any site, the Company will submit to the Local Authority the following information:
 - A method statement (in accordance with the current British Standard), stating precisely the type of plant to be used and the proposed noise control methods.
 - A programme of work indicating the sound power level and location for each activity on the programme.
 - Documentation from manufacturers' literature establishing the sound power level of plant.
 - Calculations of LAeq and maximum levels at specified buildings as requested by the Local Authority.
 - Any changes with regards to the type of plant or programme of work, the proposed alteration and information will be submitted to the Local Authority in advance for approval.
- 2.7 The use of any plant or equipment required for any emergency which causes a departure from the agreed site working practice shall be notified to the Local Authority as soon as is practicable. The company will accordingly advise the Local Authority if previously agreed noise levels are likely to be exceeded due to the adoption of alternate working methods.
- 2.8 Noisy plant or equipment will be sited as far away as is practicable from sensitive buildings. Use of barriers e.g. soil mounds, site huts, acoustic sheds or partitions to deflect noise away from noise sensitive areas will be employed wherever practicable.
- 2.9 Care will be taken when loading and unloading vehicles, dismantling hoists and moving materials, etc. to reduce impact noise.
- 2.10 The company recognises and understands that the Environmental Health Officers are bound by their duties and powers by the Current Environmental Legislation to investigate and secure abatement of any noise nuisance, regardless of the prediction work and use of any mitigation measures.
- 2.11 If levels are set, they will normally relate to a 10hr, LAeq, but may also include 1hr LAeq, 1min LAeq or other periods as may be required by The Local Authority.

3 VIBRATION

3.1 Elev8 Interiors will ensure that measures are taken to:

- 1) Protect the residents, users of buildings close by and passers-by from nuisance or harm.
- 2) Protect buildings and their contents from physical damage in accordance with item (b) below. In establishing these measures the Company will consider the following factors:
 - a) **Human Exposure**
The Company will comply with the current British Standard, Evaluation of Human Exposure to vibration in Buildings (1Hz to 80Hz). The standards for vibration assessment are defined in this British Standard.
 - b) **Protection of Structures and Contents**
The companies operation activities will be carried out so that any vibration arising will not damage adjacent structures and their contents.

3.2 The following criteria are intended as a guide; however compliance with these criteria will not absolve the Company from a duty of care.

- 1) **Comfort Criteria:**
 - 1mm per sec ppv residential properties.
 - 3mm per sec ppv commercial properties.
- 2) **Damage Criteria (DIN 4150):**
 - 3mm per sec ppv residential.
 - 5mm per sec ppv commercial.
 - Additional safeguards or tighter controls will be necessary near or in sensitive locations, e.g., hospitals,
 - Educational establishments, etc.

4 HOURS OF WORKING

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

- 0800 - 1800 Monday to Friday
- 0800 - 1300 Saturday
- No Sunday or Bank Holiday working.

Any works outside the permitted hours are to be by prior approval of The Local Authority and require 14 days' notice.

The Company understands that Approval will not be granted other than in exceptional circumstances and will be conditional on the Company informing local residents of the proposed activity.

- 4.2 The Company recognises that certain works that do not cause a disturbance to local occupiers can be undertaken outside the Core Working Period. In such situations these will be a general standard that noise should not be perceived at sensitive facades because of these works.

5 PLANT

- 5.1 Fixed items of operational plant may have to be electrically powered and not diesel or petrol driven. Where this is not practicable, suitable attenuation (noise suppression) measures will be provided.
- 5.2 Vehicles and mechanical plant used for the purpose of the works shall be fitted with effective exhaust silencers, maintained in good and efficient working order and operated to minimise noise emissions.

For each item of plant used in the works, the values quoted in the relevant current European Community Directive or UK Statutory Instrument, when measured in accordance with the Directive or Statutory Instrument, shall not be exceeded where reasonably practicable.

- 5.3 Plant muffling should be in accordance with the recommendations set out in the relevant current British Standard. NB. Plant muffling should be in accordance with the procedures set out in the current DoE Advisory Leaflet "Noise Control on Building Sites".
- 5.4 **On sites where environmental disturbance may arise:**
- Compressors will be "sound reduced" models fitted with properly lined and sealed acoustic covers which will be kept closed whenever the machines are in use.
 - Pneumatic percussive tools will be fitted with mufflers or silencers of the type recommended by the manufacturers.
- 5.5 Machines in intermittent use will be shut down in the intervening periods between works or throttled down to a minimum. Noise emitting equipment that is required to run continuously may have to be housed in a suitable enclosure (See relevant current British Standard).
- 5.6 Equipment that breaks concrete by bending rather than by percussion, or other equipment as approved by The Local Authority, will be used as far as is practicable.
- 5.7 Where practicable, rotary drills and bursters actuated by hydraulic or electrical power will be used for breaking hard materials.

6 DUST

- 6.1 The Company will take all necessary measures to avoid creating a dust nuisance and will submit a Statement to The Local Authority for approval identifying proposed measures before work commences.
- 6.2 **Measures to prevent dust will include the following practices:**
- The provision of easily cleaned hard standings for vehicles.
 - The enclosure of material stockpiles at all times and damping down of dusty materials and buildings to be demolished using water sprays during dry weather.

- The hard surfacing of heavily used areas will be kept clean by brushing and water spraying regularly.
- Control of cutting or grinding of materials on the site.
- The complete sheeting of the sides of all vehicles carrying waste and other dusty materials.
- During demolition of wall claddings and floor surfaces operations, watering at rubble chutes, covering skips and screening of buildings with debris screen/sheets, as appropriate.
- Materials should be stored away from the site boundary whenever possible.
- Unsurfaced roads and verges to receive regular damping down and cleaning where located close to sensitive locations. In certain cases, permanent surfacing will be considered.
- Establishment and enforcement of an appropriate speed limit over unmade surfaces to reduce dust.
- Completed earthworks to be sealed and/or replanted when practicable.
- Mixing of large quantities of cement and other adhesives to be carried out in enclosed/shielded areas where necessary.
- Provision shall be made for wheel cleaning facilities on-site and road/pavement cleaning near the site entrances and exits.
- The effectiveness of these measures will be monitored frequently by the Company and reviewed at least weekly, and will be inspected by the Company's Safety Officer/Consultants.

7 ASBESTOS

- 7.1** Special precautions will be taken if materials containing asbestos are encountered. The Company will comply with the Control of Asbestos at Work Regulations. The Company will observe the exposure limits and measurement methods for asbestos that are set out in the relevant current Health and Safety Executive Guidance Notes. The Company will comply with the Health and Safety Commission approved Code of Practice and Guidance Note, Work and Asbestos Insulation and Asbestos Coating which describes in detail the precautions necessary when working with asbestos insulation etc.
- 7.2** If the works involve the removal of asbestos or the demolition of premises containing asbestos, the Company will comply with the Control of Asbestos at Work Regulations, the Health and Safety Executive Asbestos Regulations, and the Approved Code of Practice and Guidance Notes "Work with Asbestos Insulation and Asbestos Coating" and "Asbestos Removal - the need for dust Control". The approved Code includes advice on waste disposal.

Please note that all asbestos removal will be carried out by Registered Contractors.

- 7.3** Asbestos waste will be double sealed in receptacles that prevent the escape of dust. In the case of crocidolite, the receptacles shall be marked in bold "Blue Asbestos Do Not Inhale Dust".

- 7.4 The disposal of waste materials containing asbestos will be arranged in advance to a licensed disposal site. Disposal sites shall be agreed with The Local Authority and the Environment Agency.
- 7.5 Special attention will be given to those parts of current Legislation, Guidance Notes and Codes of Practice which require the submission of detailed 'Plans of Work' and waste disposal arrangements to the relevant Authority for prior approval.

8 AIR POLLUTION

- 8.1 Burning of materials on the site or the factory will **NOT** be permitted.
- 8.2 The Company will take all necessary precautions to prevent the occurrence of smoke emissions or fumes from the site and factory plant or stored fuel oils for safety reasons, and to prevent such emissions or fumes drifting into residential areas. In particular, plant should be well maintained and measures taken to ensure that nothing is left running for long periods of time when not in use.
- 8.3 The Company will comply with the provisions of the current Control of Pollution Act; The Health and Safety at Work Act; the Clean Air Acts; The Environmental Protection Act; The Control of Substances Hazardous to Health Regulations and the Health and Safety Executive Guidance Notes 'Occupational Exposure Limits'.
- 8.4 The Company will comply with the lead in air standards that are set out in the current Health and Safety Commission Approved Code of Practice supporting the Control of Lead at Work Regulations.

9 CONTAMINATED / HAZARDOUS MATERIALS

- 9.1 A general site investigation will be carried out and will include an examination of the sites where the presence of contaminated materials is suspected from information listed in any environmental statement and other available information.
- 9.2 From the results of this site investigation and other sources of information, handling and disposal procedures will be developed by the Company for each work site in agreement with the Health and Safety Executive and the Environment Agency. These may include the separate temporary storage on the site for contaminated and uncontaminated materials.
- 9.3 The Company will comply with the provisions of the current Control of Pollution Act and the Control of Pollution (Special Waste) Regulations. The removal and disposal of contaminated materials will be conducted under a strict consignment note system. Disposal sites will be agreed with the Environment Agency.
- 9.4 The Company will comply with the current Control of Substances Hazardous to Health Regulations and the current Guidance Note 'Occupational Exposure Limits' to ensure that contaminated materials are handled and disposed of safely and properly.

- 9.5 The Company will take measures to prevent the contamination of water courses and aquifers during the works.
- 9.6 The Company will comply with the current Health and Safety Executive Guidance Note, Health and Safety in Demolition Work; Preparation and Planning; Legislation; Techniques and Health Hazards, and ensure that contaminated and hazardous materials are handled and disposed of safely and properly.
- 9.7 The Company will ensure that materials and waste are not deposited in any surface water course. Any water that has come into contact with contaminated materials must be disposed of in accordance with the current Water Acts, any other relevant disposal regulations and to the satisfaction of the Environment Agency. For any discharge into a watercourse or river, approval will be required from the Environment Agency and for any discharge into a sewer, a trade effluent consent will be required from the local Water Company.
- 9.8 If materials containing lead are encountered, the company will comply with the current Control of Lead at Work Regulations and the Health and Safety Commission Approved Code of Practice and will be disposed of properly.

10 SITE BOUNDARIES / HOARDING

- 10.1 The Company is not normally in control of the site boundaries, with the exception of its own premises, but will advise the Principal Contractor where boundary requirements are insufficient. All work sites should be completely fenced from public access by one of the following methods:-
 - a) **The Minimum Case**
A post chain link/mesh fence where appropriate for minimum security.
 - b) **Standard Hoardings**
A 2.4m minimum height, plywood faced, timber framed boundary hoarding of a surface density of not less than 6kg/m² for normal security and noise limitation requirements. It may be necessary to increase the minimum height to protect buildings from noise.
 - c) **Special Circumstances.**
Where a particular appearance or acoustic rating is needed.
- 10.2 The provisions of the current Health and Safety at Work Act will be followed in all cases.
- 10.3 Hoardings resulting in poorly lit walkways must have bulkhead lights fitted to provide adequate illumination.
- 10.4 Gates in the fencing or hoarding should, as far as is practicable, be positioned and constructed to minimise the noise transmitted to nearby noise sensitive buildings from the work site or from plant entering and leaving the site.
- 10.5 Hoardings will be provided and maintained by the Company for the duration of the project where the company has been contracted to do so.
- 10.6 As a minimum requirement, the site hoarding will display publicity material including information on the site programme, the telephone contacts for the receipt of complaints and/or enquiries and the name of the site representative who should be contacted.

10.7 The Company recognises site hoardings containing advertisements may require consent under the current Town and Country (Control of Advertisements) Regulations. Prior consultation should take place with the Local Council.

11 SITE ACTIVITIES

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

11.2 Where the Company is in control of hoardings and boundary fencing, it will be frequently inspected, repaired and repainted as necessary.

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

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

11.5 **Provision will be made for:**

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

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

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

11.8 Toilet facilities will be kept clean.

12 URBAN ECOLOGY – PROTECTION OF HABITAT

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

- Measures to prevent any encroachment onto valuable habitats during the construction/demolition process.
- Compliance with standards of dust and air pollution control as set out elsewhere in this code of practice.
- Precautionary measures to prevent the entry of pollutants into any bodies of water.

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

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

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

12.4 Standards of dust and air pollution control, as set out in this document, will be applied at all demolition sites to protect adjacent wild life habitats.

13 MATURE TREES

13.1 The Company will follow the specific requirements agreed with The Local Authority. No mature trees shall be interfered with without written consent from the Council.

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

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

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

14 GENERAL

14.1 Emergency telephone numbers for key personnel will be provided by the Company for use by officers of the Local Authority, should the need arise.

14.2 Lighting to site boundaries will be provided with illumination sufficient for the safety of the passing public, including the physically disabled. In particular, precautions shall be taken to avoid shadows cast by the site hoarding on surrounding footpaths and roads.

14.3 Site lighting shall be positioned and directed so as not to intrude unnecessarily on adjacent buildings and land uses or to cause distraction or confusion to passing drivers on adjoining public highways.

14.4 Fly-tipping will not be permitted. Loads will only be deposited at authorised tips or into designated barges. Deposition will be in accordance with the requirements of the Environment Agency, the current Environment Legislation, and Special Waste Regulations.

14.5 The Company will be responsible for all Lorries delivering to or exiting from a work site.

14.6 The Company will make provisions to ensure that all hazardous substances including oil drums or containers on the Company premises are controlled in accordance with current Control of

Substances Hazardous to Health Regulations, are properly banded and that no oil or other contaminants are allowed to reach water courses or ground water, including aquifers.

14.7 Fuel oil storage tanks will be contained in impermeable bund walls to contain any spillage.

14.8 Wherever possible, oils used by the Company will be recycled. Where this is not viable, oils will be disposed of in accordance with the Local Waste Authorities requirements.

15 SYNOPSIS OF LEGISLATION

15.1 Control of Pollution Act 1974

This Act covers waste disposal, water pollution, noise and atmospheric pollution, and by a series of commencement orders has repealed the Deposit of Poisonous Waste Act 1972, the Noise Abatement Act 1960, and amended or repealed sections of other acts dealing with the various forms of air and water pollution.

Part III of the Act deals with noise, and in particular:

- a) Section 60 applies to the control of noise on construction and demolition sites. The local Authority (in the form of an Environmental Health Officer) has the power to protect people in the locality from excessive noise, and may serve a notice which will:
 - i) specify the plant or machinery which may, or may not, be used;
 - ii) specify the hours during which work may be carried out;
 - iii) specify the maximum noise levels which may be emitted from any particular point or during specified hours;
 - iv) provide for any change of circumstances.

The Local Authority must ensure that the best practicable means are employed to minimise noise, and have due regard to BS 5228 Code of Practice for noise control on construction and open sites.

- b) Section 61 allows for anyone intending to start construction (which includes repair and maintenance, road-breaking, etc.) or demolition to make an application for prior consent from the Local Authority.

This consent is applied for at Building Regulations approval stage or later, and must contain particulars of the works and methods involved, and the proposed steps to be taken for minimising any resultant noise.

If a notice is served on a contractor under Section 60, a defence is to prove that the alleged contravention was caused by carrying out works in accordance with a consent given under section 61.

15.2 Control of Pollution (Special Waste) Regulations 1980

These Regulations supersede existing controls under the Deposit of Poisonous Waste Act 1972, and provide for the following:

- a) that certain categories of waste are to be regarded as special, and include:

- i) substances dangerous to life by ingestion in certain defined ways and amounts;
- ii) substances likely to cause serious tissue damage following a fifteen minute exposure or less;
- iii) substances with a flash point of 21 C or less;
- iv) prescription medicines.

The substances which, by reason of their presence, may have to be regarded as “special” are listed in Part I of Schedule I to these Regulations and include:

- Acids and alkalis
- Asbestos
- Hydrocarbons and their oxygen, nitrogen and sulphur compounds
- Lead compounds
- Organic halogen compounds (excluding inert polymeric materials like PVC)
- Many inorganic metallic and non-metallic compounds

The Regulations also require

- that waste producers give prior notice to the Environment Agency of their intention to dispose of a consignment of special waste.
- a consignment note system to confirm that the waste has been disposed of at a licensed site.
- a register containing dispatch, conveyance and disposal details by each of the parties handling the waste.
- a permanent record of the location of deposits of special waste.
- a power for the Secretary of State to direct acceptance and disposal of special wastes at a particular site.
- provisions to ensure that radioactive wastes which also have the characteristics of a special waste are subject to forms of control appropriate to both.

15.3 Environmental Protection Act 1990

The Environmental Protection Act 1990 and associated legislation relate mainly to the manufacturing, energy and waste disposal industries. The following is therefore a very brief outline of the legislation. The Act itself provides a framework for a system of control of industrial pollution, whether by release to air, water or land. It establishes a system of integrated Pollution Control (IPC), enforced by the Pollution Inspectorate, to control large scale manufacturing processes with a potential to cause serious damage. Other specified processes controlling emissions to air alone from generally less polluting processes will be regulated by local authorities. The Environmental Protection (Prescribed Processes and Substances) Regulations 1991 list those processes and substances to which IPC will apply and set out a timetable for implementation. The regulations also prescribe those processes subject to air pollution control only. The processes prescribed under IPC

may not operate after a date specified in the regulations without authorisation from the Pollution Inspectorate. One aspect which is likely to affect most construction companies is the matter of "Controlled Waste". This includes all building or demolition waste, contaminated land and any broken, worn out or surplus materials or substances. Producers and carriers of controlled waste have a duty to prevent its escape and to ensure that it is transferred only to an authorised person. When controlled waste is transferred, a transfer note, containing a description of the waste and other information specified in the Environmental Protection (Duty of Care) Regulations 1991, must be completed and copies kept by both parties for two years. The controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations 1991 require any company, or self-employed carrier, who transports controlled waste, to register with their waste regulation authority. A vehicle carrying waste may be stopped during transit for examination of the certificate of registration and transfer note. Transporting controlled waste without being registered can result in prosecution and seizure of the vehicle and/or a fine of up to £2,000.