

CLAYWOOD CONSTRUCTION LTD

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ENVIRONMENTAL POLICY

Company Policy Document

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Approved By	Paul Burke — Managing Director
Applies To	All employees, contractors, subcontractors, and anyone acting on behalf of the Company on site or otherwise
Legislative Basis	Environmental Protection Act 1990; Hazardous Waste (England and Wales) Regulations 2005; Clean Air Act 1993; Water Resources Act 1991; Control of Pollution Act 1974

1. Introduction

The purpose of this policy is to present the proposed control measures and to address the environmental issues that are applicable to Claywood Construction Ltd. The identification of these environmental issues will establish the strategy to be followed to reduce the environmental impact of operations conducted by Claywood Construction Ltd.

This plan will identify what environmental issues need to be managed during projects, and what measures are to be taken in the instance of an environmental accident, such as a diesel spillage. During the duration of each project, more specific assessments and analysis will be undertaken as and when required.

Claywood Construction Ltd recognises that the construction industry has a significant impact on the natural environment and is committed to playing its part in addressing that impact — not only through compliance with legislation but through genuine and measurable improvement in our environmental performance over time.

2. Environmental Policy Statement

Claywood Construction Ltd is committed to protecting the environment in all aspects of our work. We will meet or exceed all applicable environmental legislation and continuously improve our environmental performance.

Claywood Construction Ltd undertakes to:

- Comply with all statutory and regulatory requirements, including the Environment Act 2021 and all applicable environmental legislation.
- Comply with our clients' environmental policy requirements.
- Identify and evaluate the environmental consequences of the Company's activities including impacts on air, water, land, biodiversity, and local communities.
- Promote and support best practice for maximising environmental benefit, to encourage environmental improvement and minimise the potential for environmental damage caused by our operations.
- Educate and train our employees to promote awareness and understanding of environmental issues and their responsibilities under this policy.
- Ensure that any subcontractors demonstrate compliance with our environmental policy and that of our clients, assessed through pre-qualification and site induction processes.
- Apply the waste hierarchy — reduce, reuse, recycle, recover, dispose — to minimise the total quantity of waste produced by our operations and maximise the diversion of waste from landfill.
- Monitor and seek to reduce our carbon emissions and energy consumption across our operations, including consideration of embodied carbon in material procurement.
- Consider and seek to protect biodiversity on and around our sites, including compliance with biodiversity net gain requirements under the Environment Act 2021
- Minimise water consumption on site and prevent water pollution in accordance with statutory requirements.
- Where applicable, consult closely with statutory and local authorities, clients, third party organisations and the general public, and operate in a considerate and neighbourly manner on all sites.
- Review our environmental performance and that of our subcontractors by regular auditing of operations, identify and rectify any deficiencies, and promote continuous improvement.
- Establish and maintain an effective Environmental Management System to complement our core business operations, supported by proven Environmental Consultants where necessary.
- Set measurable environmental targets and report against these on a regular basis.

3. Environmental Impact

Where Claywood Construction Ltd work activities impact on the environment, the effects of these activities shall be considered in respect to the site and its locality so that any adverse effects may be identified, evaluated, and actioned accordingly. Significant activities and they are in terms of traffic, noise, water pollution, air pollution, fuel storage, waste, carbon emissions, and biodiversity — shall be discussed with the client prior to work commencement.

Claywood Construction Ltd will prepare environmental procedures and guidance to meet the requirements of the client and, where necessary, prepare environmental method statements for activities with the potential for a significant environmental impact.

The major environmental impacts identified for Claywood Construction Ltd work are:

- Noise and vibration
- Dust and air quality.
- Debris and Waste
- Storage and use of fuels and oils
- Storage and use of chemicals, including paints and solvents
- Construction Traffic
- Carbo emissions and energy use
- **Impact on biodiversity, protected species, and ecological features**
- **Water consumption and surface water run-off**

Where a site survey identifies the potential presence of protected species or ecologically sensitive features, appropriate ecological surveys will be commissioned prior to works commencing and any necessary mitigation or enhancement measures incorporated into the construction programme.

4. Environmental Management & Responsibilities

Claywood Construction Ltd will fully support the fundamental environmental objectives of each project with the aim of minimising the impact of the company's activities on the environment. This will be achieved through a site management system controlling day-to-day environmental issues on site, supported by a head office system monitoring the effectiveness of the site system.

Claywood Construction Ltd will appoint staff who are competent and aware of best practices and the requirements placed on our work. These individuals will be accountable for the practical application of the requirements of this policy in the workplace. All employees are expected to contribute to achieving the targets of this policy.

Managing Director	Supports the project environmental plan and ensures that Claywood Construction Ltd activities comply with it. Ensures that environmental issues identified by clients in pre-tender information are addressed in task activities. Undertakes environmental audits and inspections to identify any weakness or failings in the environmental plan and implements actions to rectify these. Holds overall responsibility for environmental performance, target-setting, and reporting at a business level.
Contracts Manager	Familiarises themselves with the requirements of this policy and regularly monitors and reviews it on each project. Ensures that adequate financial and physical resources are available for the successful implementation of the plan. Ensures subcontractor environmental compliance is assessed at pre-qualification and enforced throughout the project.
Site Managers	Familiarise themselves with the requirements of the environmental plan and oversee its implementation on site. Allocate adequate resources to ensure that client requirements are met. Shall halt operations or systems of work where there is a risk of an environmental incident. Take responsibility for ensuring corrective actions are taken to rectify hazards and unsafe acts. Act as the primary point of contact for environmental complaints from neighbours and members of the public.
Other Supervisors	Familiarise themselves with the requirements of this policy and ensure there is an effective approach to the development and maintenance of good environmental standards on site. Consult with the Project Safety and Environmental Manager to discuss environmental performance. Assist in the implementation of control measures and investigation of any environmental incidents.
Project Safety & Environmental Manager	Creates, reviews the environmental plan, and familiarises themselves with its requirements. Ensures that site complies with the requirements of the plan through weekly inspections and audits and draws up action plans to correct any problems identified. Maintains records of waste consignment notes, environmental incidents, and audit outcomes.
Operatives	Will be familiarised with the environmental plan on their first day on site and will be expected to always abide by it whilst on site. Will report any environmental concerns or incidents to their supervisor without delay.

5. Compliance with Legislation

There is a wide variety of legislation applicable to Claywood Construction Ltd activities. The following sets out the main acts and regulations relevant to our work. Through the identification of duties and responsibilities, the company aims to meet all legal requirements placed upon it and to monitor legislative developments to ensure ongoing compliance.

Category	Applicable Legislation
Soiled & Hazardous Waste	Environmental Protection (Duty of Care) Regulations 1991; Pollution; Environmental Protection Act 1990 Part II Hazardous Waste (England and Wales) Regulations 2005
Air Pollution	The Clean Air Act 1993; Health and Safety at Work etc. Act 1974; Environmental Protection Act 1990
Water Pollution	Water Resources Act 1991 Part III
Dust, Odour, Noise & Vibration	Environmental Protection Act 1990 Part III (Statutory Nuisance); Control of Pollution Act 1974 Sections 60 and 61
Waste Disposal	Environmental Protection Act 1990 Section 34 (Duty of Care); Hazardous Waste (England and Wales) Regulations 2005
Biodiversity	Environment Act 2021; Wildlife and Countryside Act 1981 (as amended); Conservation of Habitats and Species Regulations 2017
Carbon & Energy	Environment Act 2021; Climate Change Act 2008

6. Pollution Prevention

Claywood Construction Ltd understands its duties as defined by the above legislation and aims to comply with the Environment Agency's Guidance for Pollution Prevention (GPP) documents applicable to construction and demolition sites, by taking appropriate steps to prevent polluting material from construction areas contaminating water, soil, or air.

Wherever possible, hazardous, and polluting materials will be kept to a minimum on site. When materials are to be stored on site, they will be segregated into designated areas as required by legislation and the manufacturers' guidance.

The appropriate manufacturers' data sheet and COSHH assessment will be issued prior to use on site, detailing the control measures to be put into place.

An overall emergency plan will be prepared to ensure appropriate procedures are in place to prevent and mitigate damage due to accidental releases and spillages.

In the event of a pollutant being released, prompt action will be taken by Claywood Construction Ltd to minimise the effect in accordance with the appropriate emergency procedure. The Site Manager will be notified immediately and will direct the actions to be taken to secure the release and prevent exposure to personnel and the surrounding environment.

All accidental releases will be investigated by Claywood Construction Ltd and the resulting report submitted to the Contracts Manager. The incident report will propose corrective actions along with a timescale for implementation.

7. Environmental Procedures & Emergencies

The purpose of this procedure is to detail the actions to be taken when dealing with an environmental emergency. Three kinds of likely environmental emergency have been identified by Claywood Construction Ltd:

- Fire
- Explosion
- Spillage

To prevent or minimise the likelihood of environmental emergencies from spillages, the company will list all materials which have a significant environmental impact. For each of these materials, assessment sheets will be prepared by a responsible person identifying the hazards both to the environment and to employees' health and safety.

All materials that present a hazard through spillage will be stored in accordance with the manufacturers' guidelines. Where large quantities of materials are stored, appropriate training will be provided to employees regarding the actions to be taken if a spillage occurs. Any necessary equipment — such as water hoses, brushes, sand, and absorbent granules — will always be readily available on site.

Claywood Construction Ltd will operate a no smoking policy in areas where flammable materials are stored or where there is a risk of fire or explosion.

The Company will inform employees of defined emergency procedures in the event of fire and will position safety signs giving instructions on what to do. In the event of the fire brigade being called, details of the chemicals and products on site will be made available immediately.

In the event of a spillage, the site manager or supervisor must be notified so that appropriate health and safety precautions can be taken before the spillage is dealt with in accordance with the COSHH assessment. Any spillages which enter outside drains must be reported to the local water authority without delay.

In the event of a fire or explosion, the company emergency procedure must be followed. If the fire brigade is summoned, full information related to products and materials must be supplied.

All queries or complaints from employees, contractors, members of the public or clients will be dealt with personally by the Managing Director and the appropriate action taken in liaison with the Environmental Advisors.

Claywood Construction Ltd will follow any guidelines laid down in the Principal Contractor's Fire Safety Plan in the event of any emergencies.

8. Noise at Work & Limitations

Noise is subject to the provisions of the Environmental Protection Act 1990 Part III and the Control of Pollution Act 1974 Sections 60 and 61 and is defined as a statutory nuisance. A statutory nuisance is an unlawful interference with a person's use or enjoyment of property or of some right over, on or in connection with it.

Claywood Construction Ltd is committed to operating as a considerate contractor and to managing the impact of its operations on neighbouring properties and the local community. Working hours, noisy operations and vibration-generating activities will be agreed with the client and relevant authorities prior to commencement and communicated to neighbouring occupiers where appropriate.

To ensure compliance with the regulations, the company will ensure that:

- Suitable measures are taken to ensure levels of noise and vibration are kept to a minimum. Where necessary, noisier equipment will be restricted to agreed working hours.
- Machinery and plant are regularly maintained to reduce levels of noise and vibration.
- Any advice given by the local authority or Environmental Health Officers on noise and vibration levels is acted upon promptly.
- Regular monitoring of noise and vibration levels is undertaken where required.

Claywood Construction Ltd will provide suitably qualified personnel to ensure adherence to the provisions of the Control of Pollution Act 1974 Sections 60 and 61 and associated legislation, including to:

- Actively seek to reduce the level of noise and vibration created by work operations
- Provide clients with information on measures being taken to control noise and vibration and any additional measures that may be required.
- Provide all necessary ear protection to employees at risk and ensure that this is used in accordance with legal requirements.
- Provide and place warning signs dealing with noise and the hazard it presents.

9. Storage of Fuels, Oils & Chemicals

Claywood Construction Ltd will act on any requirements placed on it by the client and will advise the client of all arrangements for the handling, storage and usage of fuel, oil, and chemicals in advance of the material being brought onto site. Where feasible, the minimum quantities of fuels, oils and chemicals will be kept on site, and these will be removed when no longer required or disposed of in accordance with relevant legislation.

All fuel tanks used on site for the storage of oil should be manufactured to a recognised standard complying with BS799 for steel tanks and OFST100 for polyethylene tanks.

All fuel and oil storage will be in a bowser which will be properly maintained and, when not in use, stored within a temporary bund sufficient to hold 110% of the volume of the largest tank. The

bund will be a minimum of 750mm from the tank to the bund wall and a minimum of 600mm between the tank and its base. All bunds should be lined with an impermeable material capable of retaining the oil stored within. Facilities should be provided so that rainwater can be removed from the bund at any time, with precautions taken if rainwater is contaminated with oil.

Filling and re-fuelling will be strictly controlled and where possible confined to a location remote from any watercourses or drains. A suitable fire extinguisher must always be provided with the bowser. All waste oils and fuels will be removed from site via a licensed waste contractor for disposal in the proper manner, as required under the Hazardous Waste (England and Wales) Regulations 2005.

Chemicals will be stored in accordance with the guidelines for their storage — in sealed containers until required, in a secure compound, with measures in place in case of spill or leak. Flammable liquids shall be kept in appropriately marked metal lockers. Only enough material should be kept on site for the tasks in hand and any surplus returned to stores or disposed of correctly. Site stores should be located away from drains and watercourses.

10. Waste Management

Section 34 of the Environmental Protection Act 1990 introduces a Duty of Care for anyone who produces, imports, carries, keeps, treats, or disposes of controlled waste. Controlled waste includes domestic waste, scrap materials, and excavated materials.

Claywood Construction Ltd will apply the waste hierarchy in the management of all waste arising from its operations, in the following order of priority:

- **Reduce** — minimise waste arising at source through careful planning, procurement, and material management.
- **Reuse** — identify opportunities to reuse materials on site or divert them for reuse elsewhere before considering disposal.
- **Recycle** — segregate waste streams to maximise recycling and diversion from landfill.
- **Recover** — where recycling is not possible, consider energy recovery options through licensed contractors.
- **Dispose** — landfill disposal is the option of last resort and will be minimised wherever possible.
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Claywood Construction Ltd will submit details to the client prior to starting on site of proposals for handling, storage, carriage, and disposal of waste, including target waste diversion rates where required by the client.

Any hazardous waste created during construction work will be dealt with in accordance with the Hazardous Waste (England and Wales) Regulations 2005 and removed by a licensed waste contractor. Discharge of effluent or chemical waste of any kind into any river, waterway or drainage system will not be permitted. The burning of rubbish is not permitted on site.

Claywood Construction Ltd will advise the Principal Contractor of any waste disposal companies it proposes to use and will provide details of licences and proposed disposal points. Waste transfer notes will be retained and available for inspection. Waste will be stored in appropriate containers, clearly labelled, with clear separation between hazardous and non-hazardous waste streams.

11. Biodiversity and Ecology

Claywood Construction Ltd recognises its responsibility to protect and, where possible, enhance biodiversity on and around its construction sites in accordance with the Environment Act 2021, the Wildlife and Countryside Act 1981, and the Conservation of Habitats and Species Regulations 2017.

Prior to commencing works on any site where ecological sensitivity is identified or suspected, appropriate ecological surveys will be commissioned and any necessary mitigation or enhancement measures incorporated into the construction programme and method statements. Where biodiversity net gain is a requirement of the planning consent, Claywood Construction Ltd will collaborate with the client and their ecologist to deliver the required outcomes in accordance with the approved Biodiversity Net Gain Plan.

No works will be undertaken that would knowingly disturb or destroy protected species or their habitats without the appropriate licences and mitigation in place. Any unexpected ecological finds during works — including protected species — will be reported to the Site Manager immediately and works halted in the affected area until appropriate advice is obtained.

12. Carbon and Energy

Claywood Construction Ltd is committed to understanding and reducing the carbon impact of its operations. Whilst the Company does not currently hold formal carbon certification, we are committed to taking practical steps to monitor and reduce energy use and emissions across our sites and operations.

These steps include:

- Monitoring fuel and energy consumption across our sites and seeking to reduce unnecessary use.
- Specifying energy-efficient plant and equipment where practicable
- Considering the embodied carbon of materials in procurement decisions where alternatives of comparable cost and quality are available.
- Encouraging sustainable travel and logistics arrangements where feasible
- Working towards the adoption of recognised carbon reporting frameworks as the business develops

13. Environmental Targets

Claywood Construction Ltd is committed to setting and reviewing measurable environmental targets on an annual basis. Current targets include:

- Achieving a minimum waste diversion from landfill rate of 90% across all projects
- Reducing unnecessary fuel and energy consumption on site year on year
- Ensuring 100% of subcontractors complete an environmental induction prior to commencing work on site.
- Responding to all environmental complaints within 24 hours
- Undertaking a minimum of one environmental audit per active project per month
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These targets will be reviewed annually by the Managing Director and reported on as part of the Company's overall performance review.

11. Approval & Signature

Signed	
Name	Paul Burke
Position	Managing Director
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