

Project***HG0052*****Huddersfield Royal Infirmary
Emergency Department****Document****Environmental Management Plan
Rev 0****Approval / Acceptance Status**

	Title & Company	Name	Signature	Date
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Foreword

Before completing this document, all projects must complete the Environmental Assessment and Risk Register (EARR) as per Divisional Environmental Standard (DES1): Project Environmental Management.

The Senior Site Representative (SSR) is responsible for completing this document on projects, the Regional Director for Regional Offices.

The VINCI Construction UK Building Division HSEQ Team can provide guidance and review where required.

Revision History

This document is to be reviewed and updated, together with all other associated documents every 3 months to maintain its effectiveness. Or whenever there is a significant change to the site conditions such as a change in scope of works, site area, methodology, a change in legislation, interested parties, or after an environmental incident etc. Review to include elements such as progress on objectives and targets, training requirements, results on audits, significant communications, and close out of actions.

Record review changes in the table below.

Rev	Date	Revision details and Reason for change	Prepared by	Approved by
0	September 2021	First Issue	MH	EP

Distribution of Environmental Management Plan.

Rev	Date	Name	Position
0	TBC	Jason Dyson - Lendlease	Project Manager
0	TBC	Robert Dadzie - CHS	Environmental Manager

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1. Introduction

1.1 Project Description and Scope

IHP have been appointed by CHTS design and build a new Emergency Department with associated external works.

1.2 Overview of Environmental Aspects and Impacts Associated with the Project

The following environmental risks have been identified: -

For construction operatives, the predominant risks during the works are direct exposure to noise and dust (including any contamination such as asbestos that they may contain).

For hospital staff, patients, and members of the public, the predominant risks are exposure to noise, dust (also including any contamination such as asbestos that they may contain).

For the local environment, the predominant risk is contamination of watercourses

1.2.1 Environmental report and assessment information

Report / assessment / survey title	Author	Date	Significant aspects	How aspect could impact on the project operationally
Asbestos Survey Report	PCS Asbestos Consultants	-	Management survey identifying asbestos within Saville Court	Information to aid R&D Survey
Arboricultural report	JCA	June 2021	Tree protection measures to install prior to demolition and construction	Trees must be protected during all works
Preliminary Ecology appraisal	JCA	February 2021	Full appraisal of the ecology on site	Bat surveys to be undertaken
R&D Survey	Acorn	September 2021	Full R&D survey of the Learning Centre and Staff Residence undertaken	Asbestos removal contractor updated their scope of works

2. Project Organisation

2.1 Purpose and Commitments

ISO 14001:2015 S4.3 & S4.4

This Environmental Management Plan (EMP) and the Environmental Assessment & Risk Register (EARR) sets out how the project intends to mitigate and reduce environmental impacts and fulfil all compliance obligations, including contract specific requirements in line with ISO 14001:2015 requirements.

Where project specific procedures, e.g. Client's requirements, planning conditions, ecology reports, etc., are required, these are integrated into the EMP and communicated to those responsible for implementation, management and monitoring.

This EMP will:

- Outline the works to be undertaken by IHP and its subcontractors and how these works affect the environment and the environment the works are in.
- Evaluate and identify the significant environmental aspects and impacts associated with the delivery of the project.
- Outline operational control measures to mitigate the environmental risks associated with the project.
- Determine compliance obligations and how these will be managed.

2.2 Environmental Policy

All IHP sites display the VINCI Environmental Policy and ISO 14001:2015 certificate on site notice boards and make all site operatives aware of these documents within the site induction. The Policy will be made available to all interested parties.

2.3 Leadership, Commitment and Resources

The SSR ensures the works are carried out in accordance with the EMP, all relevant compliance obligations and that there are appropriate resources for the EMP. The SSR integrates the EMP into all the projects activities and is responsible for the effectiveness of the success, failures and continual improvement. Environmental issues is a constant agenda item on management and site meetings.

2.4 Interested Parties

2.4.1 Interested parties

Interested Party	Needs and expectations	How will communication be maintained?	Frequency	Responsible person
Client	Progress reports	Via email / meetings	Weekly	Project Management
Clinical staff	Informed of effects on surroundings	Via email / meetings	Weekly	Project Management

Interested Party	Needs and expectations	How will communication be maintained?	Frequency	Responsible person
Neighbours	Informed of effects on surroundings	Letter drops	As required	Trust
Kirklees Council	Complying with requirements	Email	As requested	Project Management
Environment Agency	Complying with requirements	Email	As required	Environmental Champion

2.5 Project Roles and Responsibilities

The organisation structure and the responsibilities of VINCI Construction UK employees are defined in the VINCI Construction UK Environmental Policy.

Roles with specific environmental responsibilities and management are defined within the table 2.6.1 below.

2.6 Training, Awareness and Competency

The training, awareness and competency levels that are required for all staff whose work may affect the objectives, targets and/or other environmental issues relevant to the project are identified by the SSR in accordance with the VINCI Construction UK Environmental Policy.

All staff, sub-contractor and operatives receive a site induction which provides an overview of the significant environmental aspects and the control measures implemented which they must adhere to.

A significant proportion of the environmental aspects of the business are a direct result of subcontractor and supplier activities. Subcontractors are assessed prior to works commencing, through pre-qualification on Construction line and iPortal before being registered as a supplier on our COINS system.

Training needs are reviewed regularly by the SSR.

2.6.1 Environmental roles and training

Name	Position	Key environmental roles and responsibilities	Environmental training and awareness obtained
Marc Heaps / Eddie Parker	SSR / Construction Manager	<ul style="list-style-type: none"> Secures the resources required to maintain the EMP. Ensure the EMP is established, implemented and maintained. Monitor the performance of the EMP. Act as the main point of contact with regulatory authorities and maintain 	

Name	Position	Key environmental roles and responsibilities	Environmental training and awareness obtained
		records of telephone conversations and all written communication relating to environmental issues.	
	Supervisors	<ul style="list-style-type: none"> Ensures compliance obligations are adhered to and continually improved. 	
	Ecologist (JCA)	<ul style="list-style-type: none"> Writing the ecology report. Monitoring and reporting ecology throughout contract 	
Eddie Parker	Senior Construction Manager	<ul style="list-style-type: none"> Ensures compliance obligations are adhered to and continually improved. 	SMSTS CIOB SEATS
Eddie Parker	Environmental Champion	<ul style="list-style-type: none"> Raise awareness of the VINCI Environmental Policy, EMP and its requirements and all environmental aspects, targets and compliance obligations to all staff. 	SMSTS CIOB SEATS
Staff and subcontractors		<ul style="list-style-type: none"> Comply with all VINCI Policy's and Standards. Comply with all applicable legislative. Contribute to the success of environmental targets and implementation of the EMP and VINCI Facilities Standards. 	Induction

3. Planning

3.1 Aspects & Impacts, Risks and Opportunities and Life Cycle Assessment (LCA)

An Environmental Aspect is:

‘an element of the projects activities, products and services that it can control and/or influence that interacts with the environment’.

An Environmental Impact is:

‘Changes to the environment, either adverse or beneficial, that result wholly or partially from environmental aspects.’

An organisational risk is an:

‘actual or potential threat of adverse effects to the organisation (VINCI Construction UK Building Division) arising from our activities.’

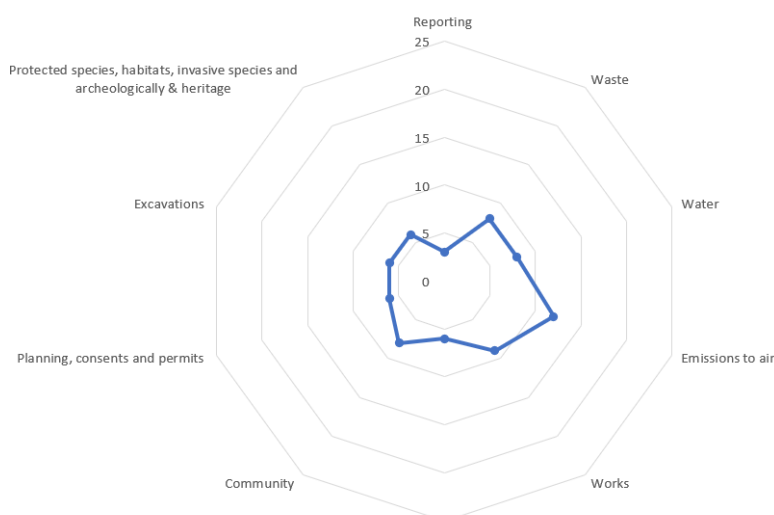
Environmental opportunities are:

‘potential beneficial effects the project/contract can provide and means to improve its performance and competitive advantage and reduce organisational risk.’

Risk management on all projects is subject to DES1 Environmental Management. This standard sets out the risk management arrangements for the environment. Every Project will complete The Environmental Assessment & Risk Register to identify and record the specific aspects, impacts, Life Cycle Assessment and compliance obligations.

Projects consider its control and influence over environmental impacts associated with product use and end-of-life treatment or disposal.

Key Environmental Aspects



3.2 Compliance Obligations

The Legislation Register is held online using Legislation Update Service (LUS). Compliance obligations relates to all relevant environmental legislation that the project must comply with and any other requirements the project subscribes to or is imposed by the client or contract requirements.

The Head of HSEQ for the Building Division will communicate any relevant changes to legislation to the project, in the form of environmental alerts and guidance.

Key compliance obligations are detailed within the Environmental Assessment & Risk Register.

3.3 Environmental Objectives

Environmental objectives will be agreed at Divisional Level. Each site implements supporting objectives which are detailed in the table below.

The project also complies with client specific contractual environmental objectives as required, also detailed within the table below.

3.3.1 Environmental objectives

Objective	How will this be achieved	Responsible person and position	Target completion date
<22t waste per £1m turnover	Record and monitor waste	Waste Champion	End of project
<29,000 kWh Energy per £1m turnover	Record and monitor energy use	Energy Champion	End of project
>70% by volume (80% by weight) diversion of waste from landfill	Record and monitor waste	Waste Champion	End of Project
<13.3m3 or 11.1t /100m2 GIFA non-hazardous construction waste	Record and monitor waste	Waste Champion	End of project

4. Communication

4.1 Internal Communications

Divisional communications consist of email and internet sources, environmental alerts and briefings. Site specific communications are as detailed below.

- Site notices
- Site inductions
- Posters
- Toolbox talks

4.2 External Communications

Relevant information from the EARR is communicated to subcontractors to ensure it is captured within their Method Statements.

A communication log is used to record all environmental communications and complaints between interested parties and the public. This log is shared with all relevant persons.

The log will be located on the server under 4.1.5 'Environmental Plan' with blank forms. The SSR is responsible for closing out complaints.

5. Document Control

5.1 Document Control

This Environmental Management Plan will be reviewed and updated every 3 months, together with all other associated documents to maintain its effectiveness. Or whenever there is a significant change to the site conditions such as a change in scope of works, site area, methodology, a change in legislation, interested parties, or after an environmental incident.

The details of all changes made as a result of each review will be recorded within the Revision History section on page 2 of this document.

Our management system documents are stored electronically in our business management system known as The Way We Work (TWWW).

5.2 Records

All the key environmental records required to be held, and the minimum length of time they must be retained for are stated in the table below.

5.2.1 Environmental records

Record	Minimum retention period
Waste Transfer Notes	2 years
Waste Consignment Notes	3 years
Waste carrier registration certificates of waste disposal contractors	2 years
Waste Management Licences or Environmental Permits of waste disposal	2 years
Timber sustainability certificates and corresponding delivery notes	2 years

6. Operational Control

Site specific activities not covered by the Group or Divisional Standards that may impact on the environment, or are relevant to the management of environmental issues will be controlled by the implementation of site specific procedures. These are to be developed by the SSR with input from appropriate specialists, interested parties and the VINCI Construction UK Building Division HSEQ Manager/Advisor.

All operatives and sub-contractors are required to have a site induction prior to starting work, which highlights environmental aspects applicable to the project, the control measures in place and the requirements from all operatives. Confirmation of receiving the induction must be obtained and retained.

Table 3.8.1 Operational control

Document	Management
Waste Management Plan (REMP)	Waste Champion to monitor
Asbestos Management Plan	Environmental Champion to ensure compliance
Materials Management Plan	Environmental Champion to ensure compliance
Surface Water Management Plan(watercourses, flood risk and runoff)	Environmental Champion to ensure compliance

7. Performance Evaluation

7.1 Monitoring and Measurement & Evaluation of Compliance

During the project the site team determines which aspects need to be measured and will develop a practical monitoring programme.

Monitoring requirements are incorporated into relevant procedures and method statements.

Results of monitoring are regularly reviewed and communicated during project review meetings.

The SSR is responsible for regular site surveillance to evaluate performance against the project specific objectives, legal requirements, environmental commitments and the requirements of the EMP.

7.1.1 Monitoring requirements and how compliance will be evaluated

Monitoring	Frequency	Responsible person(s)	Evaluation of compliance
Site Team Inspection (available on TWWW and Fieldview)	Weekly	Senior Site Representative	Tracking inspection frequency
Senior Management Audits (Footprint)	As required	Senior Manager	Tracking inspection frequency
Environmental Performance Indicator reporting - Footprint	Monthly	Environmental Champion	Measure against targets
Noise monitoring	Weekly	Environmental Champion	Measure against limits
Gas detectors during confined space working	As required	Subcontractors	Complying with Method Statements and Risk Assessments

Monitoring	Frequency	Responsible person(s)	Evaluation of compliance
Monitoring of compliance with requirements of waste duty of care	Monthly	Waste Champion	Environmental Audits
Dust monitoring	As required	Trust	Measured against baseline limits
Waste Monitoring	Monthly	Waste Champion	Measure against targets
Internal Environmental System Audit	As required	Quality Manager	
External Environmental System Audit	As required	Quality Manager	

7.2 Internal Audit Programme

In compliance with the requirements of ISO 14001:2015 the project will be audited, under the combined HSEQ Audit Programme.

A project may be audited more frequently depending on the project's environmental risks, incidents or at project management request.

7.3 Nonconformity & Corrective Action

Corrective Action Report (CAR) will be raised where a system deficiency has been identified during inspections, incident investigations, internal audits, third part audits or customer complaints.

7.4 Continual Improvement

The project will continually improve the suitability, adequacy and effectiveness of the Environmental Management System to enhance environmental performance.

This may include:

- Review of customer feedback reports and development of any specific action plans
- Reviews with our supply chain and their workforce to identify either process or product improvement measures
- Review of audit/inspection/site visit feedback recommendations and findings
- Review of internal reports/meetings, site environmental meeting, monthly project reviews, lessons learnt reviews etc.

8. Emergency Incident Preparedness and Response

The Site Emergency Environmental Incident Response Plan can be found on the server under 4.1.5 'Environmental Plan'. This document details the actions to be taken to mitigate the adverse environmental impacts during emergency situations. It also includes key contacts, reporting requirements, evacuation roles and responsibilities.

This information is predominately displayed across the site and the relevant site staff made aware of the details.

Relevant personal are trained in the effective deployment of pollution control equipment during the site induction and through regular toolbox talks and evidence of training retained.

Spill kits are located alongside fuel storage and refuelling areas, COSHH cabinets or in areas where activities using substances which could cause harm when spilled and enter the environment.

8.1 Incident reporting

The SSR reports environmental incidents, Close Calls and Positive Interventions (CC/PI's) via Footprint and Fieldview in accordance with the relevant Divisional Integrated Management Standard.

An Environmental Incident is defined as:

'an unplanned, undesired event that results in: harm or damage to the environment or the potential for enforcement action relating to environmental legislation, consents and consent conditions'.

Harm or damage to the environment includes (but not limited to):

'pollution of, or damage to, surface water, groundwater, or land; spills or leaks of oil and chemicals; damage to archaeology or heritage (listed and non-listed); damage to wildlife; including protected species and habitats; excessive noise, dust and/or other air pollutants, vibration or light pollution; or failure to control waste or excavated material in accordance with the regulations.

Incidents are classified as Level 1, 2, 3 or 4 (4 = close call)'.

Level 1: An incident which results in catastrophic harm or damage to the environment, with a high likelihood of enforcement action and/or significant media attention.

Level 2: An incident resulting in significant harm or damage to the environment with a moderate likelihood of enforcement action and/or media attention. The incident may involve the receipt of a statutory notice from a regulatory body.

Level 3: An incident resulting in limited or no damage to the environment with a low potential of enforcement action.

Level 4 (Close Call): An environmental near miss with low potential of harm or damage to the environment that could result in enforcement action.

8.2 Investigating environmental incidents

In the case of a Level 1 or Level 2 environmental incident a written investigation report will be produced by the HSEQ team. This will include details of corrective and preventative actions that are to be implemented. Where appropriate a written Root Cause Analysis will be carried out in accordance with the Divisional Integrated Management Standard.

The SSR will be the local point of contact with regulatory authorities and will maintain records of telephone conversations and all written communication relating to environmental issues. The VINCI Construction UK Building Division Head of HSEQ will be the formal point of contact with regulatory authorities and provide support and guidance for the SSR.

References

VB Environmental Assessment & Risk Register EARR VB-ENV-FR-0001-0002

VB Surface Water Management Plan VB-ENV-PL-0009-0001

VB Waste Management Plan REMP VB-ENV-PL-0003-0001

VB Emergency Response Plan VB-IMS-PL-0004-0001

VB Divisional Integrated Management Standard VB-IMS-ST-XXXX-0004