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**BOW FARM POLLUTION CONTROL AND INCIDENT  
RESPONSE PLAN**  
**For**  
**MORETON C CULLIMORE (GRAVELS) LIMITED**

**November 2024**

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# **BOW FARM POLLUTION CONTROL AND INCIDENT RESPONSE PLAN**

## **1. INTRODUCTION**

GWP Consultants LLP (GWP) have been instructed by Moreton C Cullimore Group (MCCG) to prepare a Pollution Control and Incident Response Plan (PCIRP) for the development at Bow Farm, operated by MCCG, as required under Planning Pre-Commencement Condition 25 of Planning Permission Number 19/000048/CM (Worcestershire County Council).

This PCIRP specifically relates to potential pollution of the water environment. Management and mitigation of other sources of pollution, such as light, dust, noise and vibration are covered separately under the approved Planning Permission.

### **1.1 Pre-Commencement Condition Wording**

The wording of Pre-Commencement Condition 25 of Planning Permission Number 19/000048/CM is provided below:

*"Prior to the commencement of the development hereby approved, details of pollution control measures, including pollution incident response procedures shall be submitted to, and approved in writing by the Mineral Planning Authority. Thereafter, the development shall be carried out in accordance with the approved details."*

### **1.2 Previous Reporting**

A Hydrogeological and Hydrological Impact Assessment (HIA) and Flood Risk Assessment (FRA) report (Report No. 190714 v.02) was prepared by GWP Consultants LLP (GWP) in August 2019 and submitted in support of the approved Planning Application.

A Report Letter (Report No. 200714 v.02) was then submitted by GWP in August 2020 which included technical responses to water-related matters raised in comments made by the two local planning authorities (LPAs) – Gloucestershire County Council (letter ref: 19/0081/TWMAJM) and Worcestershire County Council (letter ref: 19/000048/CM) – in their separate but identical letters dated 7<sup>th</sup> May 2020.

A further Report Letter (Report No. 220420 v.01) was prepared by GWP in April 2022 providing a technical review of the Environmental Statement submitted by CEMEX as part of their planning application for sand and gravel extraction and low-level restoration at Ripple East with respect to water-related impacts and mitigation, and the assessment of the potential for cumulative impacts of the CEMEX and Bow Farm developments to occur simultaneously. The CEMEX site is located immediately north of the M50 motorway, whereas the Bow Farm site is situated immediately south of the M50 motorway and immediately south of the CEMEX site. The report letter summarised that there will be no increased cumulative impact with respect to water related matters from the simultaneous developments.

This report and PCIRP refer to the original Planning Application.

### **1.3 Site Development**

The site will extract approximately 1.5 million tonnes of sand and gravel over an 8 to 9 year period, at approximately 200,000 to 250,000 tonnes per annum. The part of the proposed excavation area currently lying above the flood plain will be worked in 9 phases (Excavation Phases 1 to 9) and restored to existing ground level with a combination of site derived material and imported inert fill. To extract the sand and gravel resource within Phases 1 to 9, the Applicant has previously advised the site will use a clay cut-off around its perimeter, keyed into the underlying clay to hydraulically separate the site from the surrounding aquifer. Therefore, no groundwater dewatering will be required.

Two excavation areas (Flexible Working Areas A and B) located on the flood plain, will be restored to open water and wetlands using only site derived mineral waste (silts and clays) and will have a final landform below pre-extraction ground levels. Sand and gravel within Flexible Working Areas A and B will be worked wet, as no clay cut-off will be installed around these areas.

The excavated sand and gravel mineral will be moved from the Excavation Phases to a processing plant area in the southeast of the application area *via* a radial conveyor to Phase 9, before

transportation by dump truck. The processing plant area of the site will be located within Gloucestershire, whereas Excavation Phases 1 to 9 are situated within Worcestershire.

The processing plant area will be restored back to agriculture with any ponds used for silt settlement, surface water runoff attenuation, or to supply the processing plant remaining post-completion of the site to allow for additional storage of surface water runoff.

## **2. POLLUTION CONTROL MEASURES**

### **2.1 Environmental Management System**

MCCG operates an Environmental Management System (EMS) (accredited to ISO 14001) which describes the management system that has been developed to ensure that MCCG sites are operated and maintained by technically competent staff and are managed in such a way that the impact on the environment is minimised. The management system also seeks to provide a framework for minimising the potential for any accidents or incidents, which may occur, to impact on the environment. MCCG's EMS document is provided in Appendix 1.

MCCG's Environmental Policy includes designing and implementing training programmes for employees in order to increase and maintain awareness of environmental aspects, impacts and legislation. MCCG ensures the company and its staff are prepared to deal with incidents and emergency situations on-site and that suitable and effective training has taken place. Emergency procedures are periodically reviewed, and reviewed following any emergency incident, to assess the effectiveness of the procedure. Where practicable, the emergency procedure shall be tested subsequent to implementation and following any change to operations resulting in revision to the procedure. Review of procedures are recorded during management review meetings.

### **2.2 Pollution Control Measures to be Implemented**

MCCG is an experienced earthworks operator managing numerous sand and gravel extraction sites. The works will be managed by staff having the appropriate level of technical competence with relevant qualifications gained from one of the accepted industry schemes. MCCG will carry out the approved works using reasonable skill and care to avoid and/or minimise environmental incidents. The pollution control measures set out the precautions to be taken to avoid the release of hazardous substances on-site and to minimise any impacts of pollution release.

The pollution control measures aim to prevent any impact upon off-site features, including the Ripple Lake and the Napps Local Wildlife Site (LWS) adjacent to the west of Excavation Phases 1 to 9, the Ripple Meadow LWS located north of Flexible Working Area B, the Ripple Brook LWS which exists between the eastern and western parts of the site, and the River Severn LWS which is situated to the west of Flexible Working Area B.

Previously undertaken ecological assessment identified the Ripple Meadow to now be an agriculturally planted cereal field. It also identified the Ripple Lake and the Napps LWS to be a former man-made commercial osier bed, now re-colonised with wet woodland and scrub. In addition to these habitats, Ripple Quarry Lake (a man-made restoration) exists between the site and the River Severn.

The HIA and FRA report (Report No. 190714 v.02) submitted as part of the Planning Application identified potential sources of pollution during operations at the site which could impact water quality. Additional sources of pollution have also been identified. These potential pollution sources, and appropriate control measures, are outlined in Table 1.

**Table 1 – Potential pollution sources and associated control measures**

Pollution Source	Pollution Control Measures
Processing plant, machinery and vehicles all have the potential to accidentally leak oils and hydrocarbons (plus other accidental spillages)	All plant, machinery and vehicles will be routinely maintained to industry standards.
	All vehicles will be parked overnight on an impermeable hardstanding, draining to an oil interceptor. Fixed plant to be self-bunded.
	All vehicle and mobile machinery maintenance will be undertaken in an off-site facility.
	Spillage kits and oil absorbent material to be carried by mobile plant and located at vulnerable locations ( <i>e.g.</i> , crossings of land drains and ditches). The site will follow accidental spillage and clear up procedures.
Chemicals, oils, fuels, lubricants required for vehicles or other on-site uses	All required chemicals and oils will be stored in a bespoke high hazard watertight container/shed, located on an impermeable pad drained to an oil interceptor.
	On-site fuel storage will be with a double-lined tank located within a bunded compound with sufficient storage to retain 110% of the tank volume.
	Details about the fuel, oils, gases and chemicals stored at the site and how much of these are normally keep. Product data sheets and control of substances hazardous to health (COSHH) assessments for any substances that pose a risk to people or the environment.
On-site welfare facilities will require wastewater collection and disposal	Wastewater will be collected to an industry standard septic tank, which will be routinely emptied by vacuum road tanker to an off-site disposal facility.
Soil stockpiles (during operation)	Soil stockpiles to be located away from water bodies and will be seeded as soon as possible, covered with geotextile mats and/or surrounded by a bund.
Mud carried on vehicle tyres onto public roads and potentially washed into drainage systems	Mud to be controlled at entry and exits to the site using wheel washes and/or road sweepers.

<p>Site surface water runoff captured within Excavation Phases 1 to 9, and from de-vegetated areas outside of the excavated pits, has the potential to result in elevated turbidity runoff waters leaving the site</p>	<p>Surface water runoff management in accordance with Bow Farm Surface Water Drainage Scheme (GWP Report No. 240707) submitted under Planning Pre-Commencement Condition 20 of Planning Permission Number 19/000048/CM – water transferred from quarry sump to silt pond for silt settlement prior to discharge <i>via</i> temporary infiltration pond or restoration infiltration basin. Restored phases will drain surface water runoff to the completed sections of the restoration infiltration basin feature. No uncontrolled run-off will be allowed to leave the site.</p> <p>A temporary silt pond will be present during the progressive excavation and restoration of the Phase 1 to 9 areas prior to discharge through the temporary infiltration pond or the restoration infiltration basin. This minimises the chance of potentially turbid surface water discharge from this part of the site.</p> <p>Restoration infiltration basin on western edge of restored Phases 1 to 9 will filter silt/sediment from surface water runoff prior to infiltration. Overflow orifice from restoration infiltration basin to wet woodland area in the northwest of the site to have a debris screen incorporated.</p> <p>Maintenance of surface water attenuation, drainage, and infiltration features to be undertaken during operational and post-development stages in accordance with the Bow Farm Sustainable Drainage Systems (SuDS) Management Plan (GWP Report No. 240522) submitted under Planning Pre-Commencement Condition 21 of Planning Permission Number 19/000048/CM.</p>
<p>Site surface water runoff captured within the processing plant area in the east of the site has the potential to result in elevated turbidity runoff waters leaving the site. Plant located within the processing plant area have the potential to accidentally leak oils and hydrocarbons</p>	<p>Surface water runoff management in accordance with Bow Farm Surface Water Drainage Scheme (GWP Report No. 240707) submitted under Planning Pre-Commencement Condition 20 of Planning Permission Number 19/000048/CM – surface water runoff originating within the processing plant area captured within internal drains and routed to an attenuation pond <i>via</i> an oil interceptor. Controlled discharge from the attenuation pond through an orifice plate and pipe to the tributary of the Mythe Brook to the northwest of the processing plant area. The attenuation pond and oil interceptor minimise the chance of potentially turbid or contaminated surface water discharge from the processing plant area.</p> <p>External runoff kept separate to the internal runoff by use of an external open ditch which routes 'clean' water that has not interacted with the site to the tributary of the Mythe Brook to the northwest of the processing plant area.</p> <p>The attenuation pond will only receive surface water runoff collected from the processing plant area <i>via</i> the internal drains. A nearby processing/washing plant – silt pond – clean water pond system is kept as a closed system and is therefore kept separate to the runoff attenuation system of the processing plant area. This minimises the potential for contamination between the two systems.</p>

	Maintenance of surface water drainage and attenuation features to be undertaken during operational and post-development stages in accordance with the Bow Farm Sustainable Drainage Systems (SuDS) Management Plan (GWP Report No. 240522) submitted under Planning Pre-Commencement Condition 21 of Planning Permission Number 19/000048/CM.
Imported inert fill material to be placed within Excavation Phases 1 to 9 only (no imported fill material to be placed in any other part of the site as part of the site restoration). Imported inert fill material placement to be permitted under a deposit of waste for recovery EPR Environmental Permit	<p>To ensure that the recovered waste material is suitable for its intended use, the works will be managed by staff having the appropriate level of technical competence with relevant qualifications gained from one of the accepted industry schemes. Waste Acceptance Criteria (WAC) inspection procedures and protocols will be in place to ensure that the inert fill material used in the works is as described on Waste Transfer Notes, is permitted by the Environmental Permit (once obtained) and is fit for purpose.</p> <p>Water monitoring at the site in accordance with the Bow Farm Groundwater and Surface Water Monitoring Scheme (GWP Report No. 240406 v.01) submitted under Planning Pre-Commencement Condition 17 of Planning Permission Number 19/000048/CM.</p> <p>Groundwater level monitoring will be maintained throughout the operational period to confirm the integrity of the hydraulic clay cut-off seal around Excavation Phases 1 to 9, and the performance of the restoration infiltration basin.</p> <p>Groundwater quality monitoring to be undertaken at boreholes around the perimeter of Excavation Phases 1 to 9 to ensure the quality of the groundwater within the surrounding aquifer is not negatively impacted on by site activities, including the placement of imported inert fill material.</p>

### **3. POLLUTION INCIDENT RESPONSE**

#### **3.1 Immediate Response and Clean-up**

As part of this PCIRP, a pollution incident response plan is incorporated in the event that an uncontrolled release, pollution incident (such as a spillage) or nuisance event were to occur. The pollution incident response plan is designed to contain and limit the effects of a pollution incident, as far as reasonably practicable, by listing the rapid response and other procedures (such as clean-up) to be followed in such an event.

Any environmental incidents that occur on-site will be reported to the Site Manager at the earliest opportunity and within 24 hours. Environmental incidents must be reported immediately to the Environment Agency 24-hour Emergency Hotline on 0800 80 70 60.

Lists of all materials and equipment to deal with pollution incidents will be produced by MCCG and held on site.

Action taken will be dependent on the nature and seriousness of the pollution incident/spill. The pollution incident response procedure actions have been categorised into immediate responses (Table 2) and clean-up (Table 3). It is important to note that an incident should only be tackled if staff have been trained and it is safe to do so.

**Table 2 – Pollution incident response procedure – immediate response**

<b>Response Procedure – Immediate Response</b>	
1.	All pollution incidents must be reported immediately to the Site Manager.
2.	Identify what has been spilt and assess the risks to health and the environment. <b>AN INCIDENT SHOULD ONLY BE TACKLED IF STAFF HAVE BEEN TRAINED AND IT IS SAFE TO DO SO.</b>
3.	Decide if Emergency Services and Environmental Regulators are required to be notified. <b>If personnel require immediate medical attention, or a fire has broken out which cannot be combatted with fire response procedures, then the relevant Emergency Services should be contacted immediately by dialling 999.</b> <b>Environmental incidents must be reported immediately to the Environment Agency 24-hour Emergency Hotline on 0800 80 70 60.</b>
4.	Move people a safe distance away from the incident area and away from any fumes that may be being expelled. Evacuate the site (if necessary).
5.	Seal off the area to prevent further exposure of people and to prevent further spreading of the spill by people and equipment.
6.	Help any injured or exposed people and summon medical help.
7.	Contain event and prevent off-site contamination: Prevent liquid spills <i>e.g.</i> , effluent or firewater, from entering natural waterways. Block off drains with spill kit material. Close any penstock valves or shut-off valves (if present). Booms deployed on hard surfaces or watercourses. Contain liquid spills by absorbing with a suitable inert solid (sand, earth). Cover powders to prevent them becoming wind-blown. If the spill is as a result of a leak from fixed equipment, or a vehicle, place a container under the leak (if possible) to capture drips until repairs can be made.
8.	Stop the leak or spill at source (if a small-scale spillage has occurred <i>e.g.</i> , from a knocked over container, and further spillage can be prevented safely, then this step can occur earlier).

**Table 3 – Pollution incident response procedure – clean-up**

<b>Response Procedure – Clean-up</b>	
1.	Locate the Material Safety Data Sheets for the spilled material.
2.	Review the information given on the potential risks to health, safety and the environment.
3.	Put on the recommended personal protective equipment (PPE) (face shield, goggles, gloves, overalls and protective boots).
4.	Assemble the proper materials and equipment for the clean-up.
5.	<b>If the spill takes on unusual properties (odour, smoke, bubbling), IMMEDIATELY STOP THE CLEAN-UP, evacuate the area, and contact the Emergency Services by dialling 999.</b>
6.	If necessary, neutralise the spill to render it safe (depends on the nature of the incident).
7.	Spills of dry materials must be swept or vacuumed up and not washed to drains.
8.	Wash any equipment or floors so that no traces of the chemical remain.
9.	Place the contaminated absorbent material and PPE in a container suitable for storage and transportation off-site by a specialist clean-up company. Contact the specialist clean-up company to arrange for future collection of the waste material.
10.	Absorb the wash water and place it in the same container with the contaminated absorbent materials.
11.	Label the container as containing hazardous material.
12.	Store the waste safely until it can be collected by the specialist clean-up company.

### **3.2 Personal Contamination**

Dealing with a pollution incident/spill may involve personal contamination if a staff member has come into contact with substances. In these instances:

- Staff will be trained to know where the nearest eyewash and safety shower is located.
- For small spills on the skin, eyes or hair, these areas should be flushed immediately with water.
- For spills on clothing, contaminated clothing should be removed immediately and the person should stand under running water.
- Site Manager informed and medical advice sought.

### **3.3 Pollution Incident Waste Material**

Table 3 outlines the procedure for dealing with any waste that may arise from a pollution incident. The following commentary applies to any such waste:

- Staff will be trained to know where the nearest eyewash and safety shower is located.
- Any waste material must be disposed of legally, safely and properly.
- Waste material from an incident will come under the Duty of Care from the Environmental Protection Act 1990.
- The waste must be transferred to a registered waste carrier.
- If the waste is hazardous additional requirements will apply and its movement must be accompanied by a Waste Transfer Note.

## **4. ADDITIONAL MEASURES**

### **4.1 Staff Training**

The EMS implemented by MCCG ensures the company and its staff are trained to deal with incidents and emergency situations on-site. Notwithstanding this, the following applies in terms of specific pollution incident response at the site:

- All relevant staff must know how and when to contact emergency responders in line with pollution incident response procedures.
- Staff must be suitably trained in evacuation procedures.
- Staff must be trained in the use of spill kits, drain blockers and other pollution control equipment and the operation of pollution control devices.
- Training in any special methods to deal with on-site substances which may pose particular health or environmental risks.
- Staff trained in recovering spilled product and the safe handling and legal disposal of any waste associated with pollution incidents (as in Table 3).
- Trained staff available to deal with media enquiries.
- Maintain documented records of training at the head office (also on-site, if required).

### **4.2 Pollution Incident Response Plan Testing**

The PCIRP, and the immediate response and clean-up procedures included within the plan, will be regularly tested to demonstrate that the plan works, develop and ensure staff competencies in emergency response, and make sure the specific procedures are viable and effective.

### **4.3 Review and Maintenance**

The PCIRP will be reviewed on an annual basis (minimum) or after a test exercise or actual pollution incident.

A suitable designated member of staff will lead the review in communication with the Site Manager.

Any updates or changes to the PCIRP will be communicated with staff and other responders as appropriate.

GWP CONSULTANTS  
NOVEMBER 2024

## **APPENDIX 1**

### **Moreton C Cullimore Group Environmental Management Systems Manual**



**ENVIRONMENTAL MANAGEMENT  
SYSTEMS MANUAL**

to

**BS EN ISO 14001**

**Cullimore Group of Companies**

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### Amendments Procedure

All copies of this EMS Manual must be kept under full control to prevent the management systems from becoming unreliable. The following procedure will ensure that the EMS Manual remains current and valid.

- 1) All copies of the manual will be clearly numbered and the holder recorded.
- 2) Each page in the manual will individually numbered.
- 3) The Managing Director will be responsible for all revisions and additions being recorded.
- 4) Any employee may suggest changes but all changes must only be implemented under the authorisation of the Managing Director or designated signatory.
- 5) All changes must be recorded on the amendments register and the appropriate pages in each Manual amended.

### Distribution List

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<b>Table of Amendments</b>					
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ALL	-	2	04/12/17	Revisions in accordance with ISO 14001:2015	AB
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none	-	5	04/02/22	Revisions in accordance with ISO 14001:2015	AB



## **2. Introduction to the environmental management system**

The Cullimore Group of Companies ("the Group") has generated this manual to help define its environmental management system (EMS), which has been established to demonstrate the Group's commitment to improving the environmental impact of its business activities and to better satisfy the requirements and expectations of its stakeholders.

The EMS has been designed to achieve the requirements of BS EN ISO 14001 and this manual reflects this international Standard in its structure and content. All the requirements of the Standard have been incorporated into the manual and the methodology, procedures and documentation of the EMS have been defined or referenced within the manual.

The manual is a guide to the EMS that is to be used by the staff of the Group to maintain its practices and procedures in a manner that assures conformity with the Group's environmental policy and BS EN ISO 14001. The interaction of the processes is described in 4.4.

## **3. Terms and definitions**

All EMS terms used within the manual are defined within BS EN ISO 14001.

## **4. Context of the organization**

### **4.1 Understanding the organization and its context**

The Group operates in well-regulated processes such as mineral extraction, manufacturing and service and repair. The Group is committed to ensuring a high level of compliance with legal requirements and all other requirements to which it subscribes.

The internal and external issues that could affect the Group will be determined and maintained by top management in accordance with EMS procedure P13, and will be reviewed when significant changes occur.

### **4.2 Understanding the needs and expectations of interested parties**

The needs and expectations of all interested parties, both external and internal, will be determined and maintained by top management in accordance with EMS procedure P13, and will be reviewed when significant changes occur.

**4.3 Determining the scope of the quality and environmental management systems**

This EMS covers the activities and functions performed by the defined operating areas within the Cullimore Group of Companies (the "Group"), incorporating Moreton C. Cullimore (Gravels) Ltd. and Cullimore Mix Ltd., included in the service scope definition:

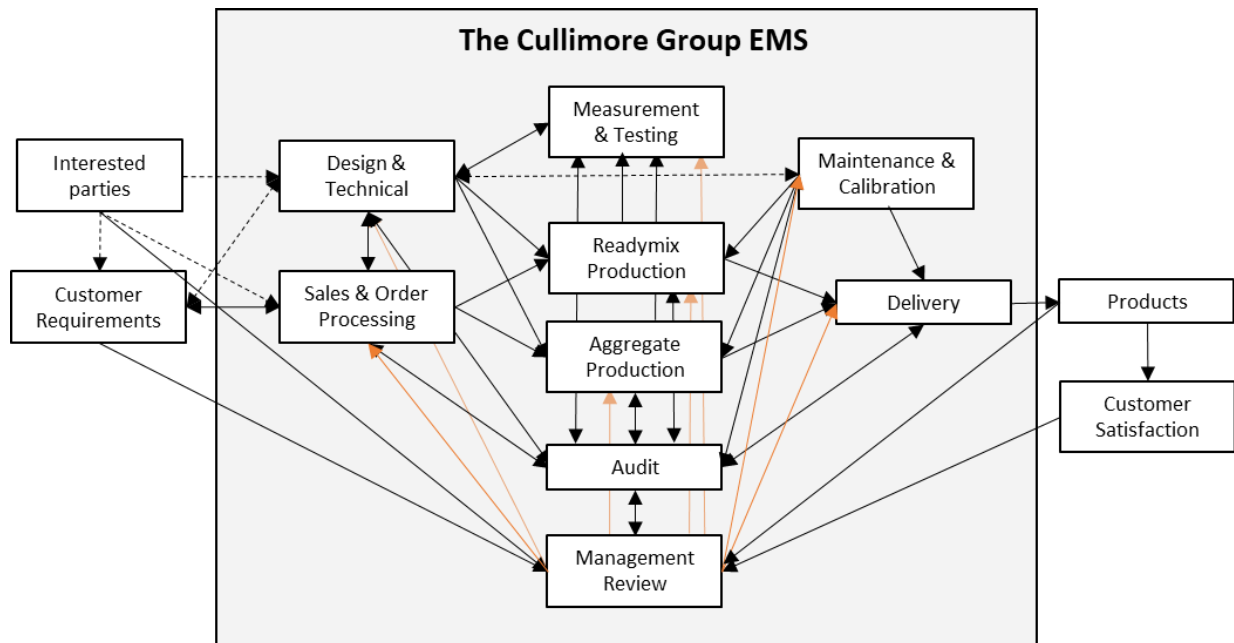
All activities involved in the process of concrete production, aggregate extraction and processing, inert waste, transport and general haulage and aggregate deliveries.

The EMS is designed to meet the requirements of BS EN ISO 14001 and all relevant compliance obligations.

The scope, including applicable locations, is available to all interested parties through the BSI Certificate of registration on the Group's website.

**4.4 The environmental management system and its processes**

The Cullimore Group EMS is established throughout the operational and management processes of the Company. The interactions of processes are described in the diagram below:





## **5. Leadership**

### **5.1 Leadership and commitment**

The Group's top management is committed to ensuring that the EMS is effectively implemented and will ensure that the environmental policy and objectives are compatible with the strategic direction and context of the organization.

Top management will attend periodic internal meetings at which the effectiveness of the EMS will be discussed, including the integration of the EMS into the business processes, resources, communication, intended outcomes and continual improvement.

### **5.2 Environmental policy**

The Group's top management has established an environmental policy that reflects the nature, scale and environmental impacts of its activities. This policy, defined below, will be communicated to all persons working for or on behalf of the Group and will be available to interested parties through the Group's website.



# CULLIMORE GROUP ENVIRONMENTAL POLICY STATEMENT

This Policy has been produced by the Directors of the Cullimore Group of Companies in order to ensure that the procedures and activities of the Group are carried out with the minimum of environmental impact and in compliance of all applicable legislation and all other environmental requirements to which the Group subscribes. Cullimore Group has a commitment to recycle the maximum amount of material that it collects and brings to the site for processing.

The Directors have implemented an Environmental Management System.

The Directors will instruct and encourage the employees and subcontractors to effectively use the resources available and minimise the use of raw materials, gas, electric, water and fuel and minimise avoidable pollution.

The Directors will design and implement training programmes for employees in order to increase and maintain awareness of environmental aspects, impacts and legislation.

The Directors will ensure that the company is prepared to deal with all incidents and emergency situations on the site and that suitable and effective training has taken place.

The Directors are determined to continually improve the service provided by the Cullimore Group and, by using expert knowledge, increase the quantity of material recycled at the site on an on-going basis.

The Directors will promote the setting of Environmental Objectives throughout all of the Company's processes in order to achieve the environmental goals set out in this policy. The objectives will be communicated to all relevant staff and will be reviewed on a regular basis.

All employees, visitors, suppliers and sub-contractors are encouraged to assist in enforcing this policy by following site rules and verbal instructions.

Signed.....

Managing Director

04/02/21



### **5.3 Organizational roles, responsibilities and authorities**

The roles, responsibilities and authorities have been defined with top management maintaining responsibility and authority in all aspects of the EMS unless specifically delegated, which will be appropriately communicated. An Environmental Representative has been appointed to maintain the EMS and reports to top management.

The Group's organisational structure is published and issued to all operating locations. Key roles and responsibilities are given in the following table:

#### **Key roles and responsibilities:**

<b>EMS Manual Reference</b>	<b>Description</b>	<b>Primary &amp; Management Responsibility</b>	<b>Secondary Delegated Responsibility</b>
1	EMS Manual Control	Managing Director (MD)	Environmental Representative (ER)
4.1	Understanding the context of the organization	MD	-
4.2	Understanding the needs and expectations of interested parties	MD	-
4.3	Determining the scope of the environmental management system	MD	-
4.4	Environmental management system	MD	-
5.1	Leadership and commitment	MD	-
5.2	Environmental policy	MD	-
5.3	Organizational roles, responsibilities and authorities	MD	-
6.1	Actions to address risks and opportunities	MD	-
6.2	Environmental objectives and planning to achieve them	MD	All Managers
7.1	Resources	MD	-
7.2 & 7.3	Competence, training & Awareness	MD	ER
7.4	Communication	MD	ER
7.5	Documented information	MD	ER
8.1	Operational planning and control	MD	ER
8.2	Emergency Preparedness & response	MD	ER
<b>EMS Manual Reference</b>	<b>Description</b>	<b>Primary &amp; Management Responsibility</b>	<b>Secondary Delegated Responsibility</b>



9.1	Monitoring, measurement, analysis and evaluation, including evaluation of compliance	MD	ER
9.2	Internal Audits	MD	Ind. Consultant / Internal Auditors
9.3	Management Review	MD	-
10.1	Improvement (general)	MD	-
10.2	Nonconformity and corrective action	MD	ER
10.3	Continual improvement	MD	-

## **6. Planning**

### **6.1 Actions to address risks and opportunities**

#### **6.1.1 General**

The Group has established a documented EMS, including this manual, environmental operating procedures and emergency procedures, in order that the Group's processes can be appropriately managed to ensure that the EMS can achieve its intended outcomes.

The risks and opportunities that could affect the Group will be determined and maintained as documented information by top management in accordance with EMS procedure P13, and will reviewed when significant changes occur.

#### **6.1.2 Environmental aspects**

The Group has reviewed the activities and working practices of the organization and has identified all its environmental aspects. The significance of the aspects has been assessed and procedures and programmes initiated to control or reduce the most significant aspects.

All the aspects will be periodically reviewed to re-assess their continuing significance and, where appropriate, the procedures and programmes will be updated. Reviews of the aspects will be reported to the Management Review Meeting.

The environmental aspects and impacts for each of the Group's locations and the criteria for determining their significance will be maintained as documented information in the Aspects Register.

#### **6.1.3 Compliance obligations**

The Group has identified all relevant legislation related to its EMS and recorded this in the Legal Register. The Group has established its compliance with the legislation



and will periodically review its compliance and whenever there is a change to the legislation or its legal permissions or consents. The reviews will be recorded in the Management Review Meeting.

The Group has also considered all other environmental requirements related to its EMS that the Group has subscribed to. Compliance with these requirements will also be established and will periodically reviewed or when changes to the requirements occur. These reviews will also be recorded in the Management Review Meeting.

#### **6.1.4 Planning action**

The Group shall primarily plan actions to address significant environmental aspects, compliance obligations and its risks and opportunities through the implementation of Environmental Procedures, Emergency Procedures and Environmental Objectives.

The evaluation of the effectiveness of planned actions will be achieved through internal audit and management review.

### **6.2 Objectives and planning to achieve them**

#### **6.2.1 Environmental objectives**

The Group's policy is to establish objectives and targets covering the scope of processes throughout the organisation and are intended to be consistent with the environmental policy. For each objective and target, a programme will be established by which it is intended that the objectives and targets will be met and continual improvement achieved. Each objective will be communicated to the appropriate staff having influence over the achievement of the objective.

The objectives, targets and programmes will be maintained as documented information in the Objectives File.

#### **6.2.2 Planning actions to achieve environmental objectives**

Objectives set by managers will be recorded on the objectives form, which will stipulate what will be done, what resources will be required, who will be responsible, when it will be completed and how it will be evaluated.

The evaluation of objectives will be reviewed at the Management Review Meeting.

## **7. Support**

### **7.1 Resources**



The Group's top management shall ensure that adequate resources are available in order that the EMS can successfully be established, implemented, maintained and improved.

## **7.2 Competence**

The Group shall ensure that any person performing tasks, for it or on its behalf, that have a potential effect on the EMS is competent on the basis of appropriate education, training or experience.

The training needs of all staff will be assessed in relation to the organisations EMS and the appropriate training planned and executed. Training needs will be recorded as part of the Management Review Meeting.

All training in relation to the EMS shall be recorded and a register of training maintained.

## **7.3 Awareness**

The Group shall provide environmental awareness training to all persons working for it or on its behalf to ensure all persons understand the importance of conformity with the environmental policy and the procedures and requirements of the EMS.

Significant environmental aspects and related actual or potential impacts associated with their work will be communicated to those persons through specific procedures and emergency procedures.

## **7.4 Communication**

### **7.4.1 General**

The Group has established a procedure for communications relevant to the EMS, P14. This procedure documents on what, when, with whom and how the Group will communicate, taking into account its compliance obligations.

Appropriate documented information will be retained as evidence of the Group's communications.



### **7.4.2 Internal communication**

The Group will ensure that it maintains effective communication of its EMS to all staff through awareness training, issue of relevant procedures and the implementation and feedback of objectives, targets and programmes. Top management will encourage the reporting of any incidents, near misses and opportunities for improvement from any members of staff, contractors and visitors.

### **7.4.3 External communication**

The Group will ensure that any communications received from external bodies with regard to its EMS will be reviewed and actioned by authorised staff and will be recorded in the Management Review Meeting.

The Group will ensure that all external communications arising from compliance obligations are actioned as required.

Details of the Group's environmental policy will be made available to interested parties on through the Group's website.

## **7.5 Documented information**

### **7.5.1 General**

The Group has established documentation to meet the requirements of BS EN 14001. These include:

- The EMS Manual
- The Aspects Register (including aspects significance)
- Environmental Procedures Manuals (including Emergency Response Procedure)
- Objectives file
- Legal Register
- Documented information necessary to ensure the effective planning, operation and control of processes.

### **7.5.2 Creating and updating**

The Group will ensure that all documented information will be created in appropriate format and media and suitably identified and approved. Documented information shall be reviewed for its suitability through the internal audit process.

### **7.5.3 Control of documented information**

The Group will ensure that the documents of the EMS are adequately controlled. The following documents will be controlled in order that the current status of the documents are maintained and that revisions are correctly authorised and distributed:

- EMS Manual
- Aspects Register
- Legal Register
- EMS Procedures
- EMS Emergency Procedures

All documented information generated by the EMS must be controlled in order that they are available for retrieval as required.

The Environmental Representative will be responsible for ensuring that all EMS documented information are identifiable and stored in a manner such that the information is preserved, secure and readily retrievable.

The Environmental Representative will be responsible for ensuring that output documented information from the EMS are retained for a minimum of three years.

## **8. Operation**

### **8.1 Operational planning and control**

The Group has identified the processes and operations that are associated with its significant environmental aspects and has established documented procedures for each significant aspect.

The procedures have been implemented to ensure the adequate control of the process or operation to prevent the deviation from the environmental policy, objectives and targets.

The procedures will be issued or communicated to all relevant operatives, including suppliers and contractors, whose operations influence the significant aspects.

The procedures will be controlled documents and the master copies will be held in the Aspects Register.

All the procedures will be reviewed periodically and updated in relation to aspects significance and the objectives, targets and programmes. The review of procedures will be recorded at the Management Review Meeting.



## **8.2 Emergency preparedness and response**

The Group has reviewed the processes and operations of the organization and identified potential emergency situations and potential accidents that could have an impact on the environment. An emergency procedure has been established and implemented for each potential emergency situation or accident.

In the event of an emergency, the Group will take the necessary response to prevent or mitigate any adverse environmental impact.

The procedures will be controlled documents and will be held in the Environmental Procedures Manual.

The emergency procedures shall be periodically reviewed and following any emergency incident, to assess the effectiveness of the procedure. Where practicable, the emergency procedure shall be tested subsequent to implementation and following any change to the operations resulting in revision to the procedure. The review of procedures will be recorded at the Management Review Meeting.

## **9. Performance evaluation**

### **9.1 Monitoring, measurement, analysis and evaluation**

#### **9.1.1 General**

The Group has established procedures for monitoring and measuring key characteristics and activities of its operations that could have a significant environmental impact. Where practicable, these will be incorporated into the organization's environmental objectives and targets.

Where monitoring and measurements are undertaken, the Environmental Representative will ensure that any equipment used is calibrated or verified and documented information of such maintained.

#### **9.1.2 Evaluation of compliance**

The Group will regularly evaluate its compliance with its legal requirements and all other requirements to which it subscribes through a review of the Legal Register and associated documented information.

The evaluation will be carried out at least annually, the results of which will be recorded as documented information and will be reviewed at the Management Review Meeting.



## **9.2 Internal audit**

### **9.2.1 General**

Internal audits will be carried out at regular intervals and will be structured such that each area of the Group's EMS is audited at least annually.

### **9.2.2 Internal audit programme**

The Environmental Representative will be responsible for the planning of audits and the audit plan will be recorded.

The Managing Director will be responsible for appointing auditors to conduct the internal audits. An auditor may not audit aspects of the EMS maintained by himself/herself, these must be audited by a third party who is competent in environmental auditing.

Each element of the EMS will be checked against the procedure in place to ensure that its requirements and the environmental policy and objectives are being met and that the overall purpose of the procedure is being fulfilled.

The auditor will record any variation from the procedure or nonconformity and the Environmental Representative will be responsible for circulating the actions to the appropriate personnel. The Environmental Representative will be responsible for ensuring that corrective actions are completed and signed off.

Any nonconformity identified will be assessed for its impact on the EMS.

The Environmental Representative will be responsible for maintaining documented information of audits and corrective actions and for their presentation at the Management Review Meeting.

## **9.3 Management review**

The Group's top management shall review the organisations EMS at least annually. The Management Review Meeting will record the reviews of the EMS, either carried out at the meeting or at prior meetings. In so doing, the adequacy and effectiveness of the EMS shall be assured.

The agenda of the Management Review Meeting shall include:

- Progress of actions from previous minutes
- Changes to internal and external issues
- Changes to needs and expectations of interested parties, including compliance obligations

- Review of environmental aspects
- Changes to risks and opportunities
- Review of objectives and targets
- Nonconformities and corrective actions
- Results of monitoring and measuring
- Evaluation of compliance with legal and other requirements
- Results of internal and external audits
- Resources, roles, responsibilities and authorities, including training needs
- Complaints and other communications from interested parties
- Review of procedures and emergency procedures
- Opportunities for continual improvement

The output of the Management Review Meeting will include:

- Review of the continuing suitability, adequacy and effectiveness of the EMS
- Continual improvement opportunities
- Need for changes to the EMS, including resources
- Actions, if necessary, if environmental objectives have not been achieved
- Opportunities to improve the integration of the EMS into the business processes
- Any implications for the Group's strategic direction

Documented information of the Management Review Meetings will be retained.

## **10. Improvement**

### **10.1 General**

The Group will identify opportunities for improvement across all its processes and, where appropriate, establish environmental objectives to capitalize on the opportunities.

### **10.2 Nonconformity and corrective action**

The Group has established a procedure for the identification of actual and potential environmental nonconformities and the implementation of corrective actions. Top management will encourage the reporting by staff of any environmental nonconformity or near miss through the use of the Health & Safety and Environmental Incident Reporting Form.

Should any nonconformity occur, the organisation will take the necessary action to mitigate any environmental impact. All nonconformities or near misses will then be investigated to identify its cause and whether similar nonconformities could occur elsewhere in the Group. The appropriate corrective action will be implemented, including any changes to procedures or other documented information in the EMS,



to avoid any recurrence. All actions will be appropriate to the magnitude of the problems and the environmental impacts encountered.

All corrective will be reviewed subsequent to their implementation to ensure their adequacy in maintaining the compliance of the EMS.

Occurrences of nonconformity or near misses and their resulting corrective actions will be recorded as documented information and reviewed at the Management Review Meeting.

### **10.3 Continual improvement**

The Group will aim to achieve continual improvement through the identification of opportunities, implementation of objectives and subsequent review of their effectiveness.