

Construction Phase Plan

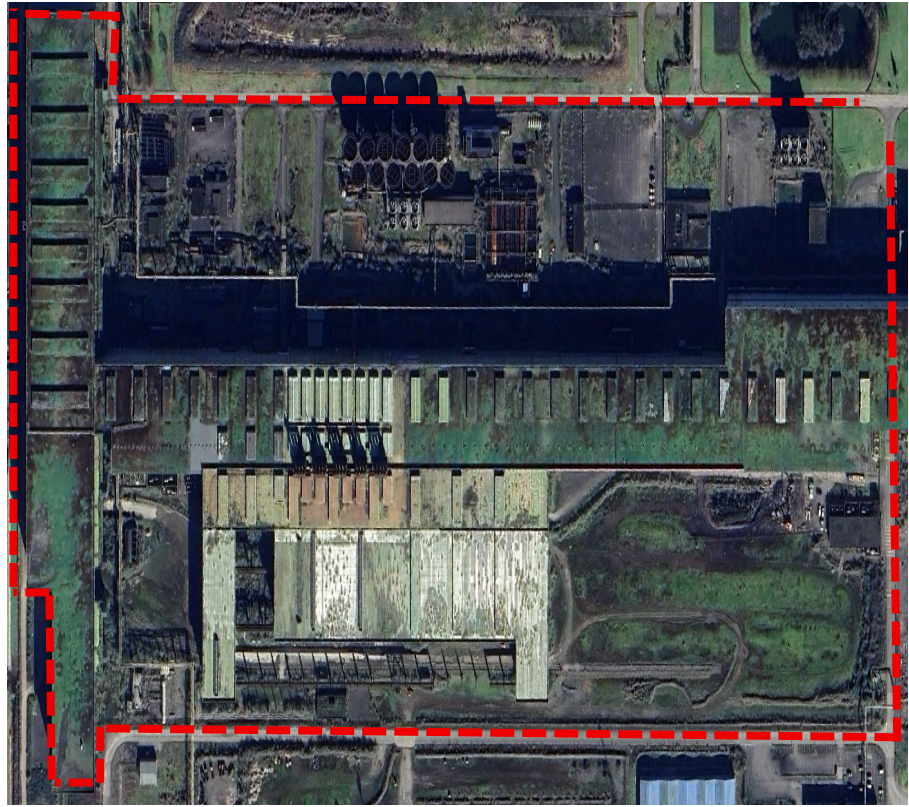


Figure 1 Llanwern Hot Mill CDM project

Haywood Crushing
Demolition Ltd
Unit 14 Haywood
Industrial Complex
Wellington
Hereford
HR4 8DZ

Project Title	Hot Mill		
Client	TATA Steel		
Address	TATA Steelworks, Llanwern, Newport. NP19 4QZ		
Ref No:	C0098	Revision No:	3
Start date	29 th September 2025	Duration	130 weeks

F100 – CONSTRUCTION PHASE PLAN



Project Number and Title:			Revision No.
Prepared by:	Print Name: Dave Cobern	Signed: D Cobern	Date: 22.09.2025
Reviewed by:	Print Name: Jack Musto	Signed: J Musto	Date: 22.09.2025

Revision Detail			
Revision No.	Revision Detail and Issue Status:	Completed by:	Issued Date:
3	Revised by Perses, for CDM regs & Turley for planning purposes <i>copies kept</i>	- Dave Cobern	- 19.09.2025
-	-	-	-
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NOTE: All REVISIONS completed will be UNDERLINED to highlight and show changes made after first issue. Where DELETION required, double strike through [e.g., ~~text no longer required~~].

NOTE: Where updating a previously revised document, convert previous revisions UNDERLINED back to NORMAL TEXT and DELETE text that was previously double struck through;

Contents

1. Introduction

- 1.1 Preparation and Development
- 1.2 Structure
- 1.3 Status

2. Description of works

- 2.1. Scope and Description of the Project
- 2.2. Contract Details
- 2.3. Existing Conditions
 - 2.3.1 Existing Ground Conditions, Hazardous Materials and Project Survey Information
 - 2.3.2 Existing Underground Services
 - 2.3.3 Existing Above Ground Services
 - 2.3.4 Existing Buildings, Structures, Plant or Occupied Premises
 - 2.3.5 Planning Restrictions / Conditions
 - 2.3.6 Surrounding Land Use and Restrictions
 - 2.3.7 Existing Traffic Systems, Features and Restrictions
 - 2.3.8 Environmental Features and Restrictions

3. Management of the Works

- 3.1 Project Organisation
- 3.2 Management Responsibility
- 3.3 Management Policy
- 3.4 Objectives and Targets
- 3.5 Management Review
- 3.6 Best Practice Schemes
- 3.7 Environmental Goals
- 3.8 Communication and Co-operation
 - 3.8.1 Communicating and Issue of Information
 - 3.8.2 Co-ordination and Co-operation of Subcontractors
 - 3.8.3 Liaison between Parties on Site
 - 3.8.4 Exchange of Health and Safety Information between Contractors
 - 3.8.5 Project Performance Review Meetings
 - 3.8.6 Employee Consultation
 - 3.8.7 Public Consultation

3.9. Design Control

- 3.9.1 Ensuring the Design Process Complies with CDM Regulations
- 3.9.2 Scope of Contractor Design
- 3.9.3 Design Management
- 3.9.4 Exchange Design Information
- 3.9.5 Handling Design Changes During the Project

3.10. Procurement

- 3.10.1 General
- 3.10.2 Sub-contractors
- 3.10.3 Designers

3.11. Project Set Up

- 3.11.1 Project Layout Plan for the Works
- 3.11.2 Pedestrian and Vehicle Management
- 3.11.3 Project Rules
- 3.11.4 Means of Access and Places of Work
- 3.11.5 Visitors

3.11.6 Exclusion of Unauthorised People and Project Security

3.11.7 Welfare

3.11.8 COSHH and Fuel Storage

3.12. Information and Training

3.12.1 Induction

3.12.2 Daily Activity Briefing

3.12.3 Toolbox Talks

3.12.4 Competence and Training Records

3.12.5 Internal and External Training

3.13. Incident Management

3.13.1 Reporting

3.13.2 Investigation

3.13.3 Emergency Response

3.13.3.1 Fire and Emergency Procedures

3.13.4 Fire Risk Assessment

3.13.5 Emergency Planning

3.13.6 First Aid

4. Arrangement for Controlling Significant Project Risks

4.1 Significant Project Hazards and Risks

4.2 Risks Identified by the Principal Contractor

4.3 Risk Control

4.3.1 Activity Risk Assessment

4.3.2 Method Statements

4.3.3 Permits

4.3.4 Change Control

4.3.5 Control of Sub-contractors

4.4 Control of Materials

4.4.1 General Controls

4.4.2 Delivery & Removal of Materials (including Waste)

4.4.3 Storage and Distribution

4.4.4 COSHH and Fuel Storage

4.4.5 Control of Plant and Equipment

4.4.6 Personal Protective Equipment

4.5 Temporary Works

4.6 Monitoring Arrangements

4.6.1 Project Audits

4.6.2 Statutory Inspections and Registers

4.6.3 Establishing Exclusion Zones

5. Safety Risks

5.1.1 Services, including Disconnection and Termination

5.1.2 Adjacent Land Use

5.1.3 Stability of Structures

5.1.4 Preventing Falls

5.1.5 The Use of “Bandstands” is Prohibited on Site

5.1.6 Podiums

5.1.7 Mobile Towers

5.1.8 Mobile Elevating Work Platforms (MEWPs)

5.1.9 Scaffolding

5.1.10 Work with or Near Fragile Materials

5.1.11 Control of Lifting Operations

5.1.12 Maintenance of Plant and Equipment

- 5.1.13 Excavations
- 5.1.14 Slips, Trips and Falls
- 5.1.15 Underground Services
- 5.1.16 Health Risks
- 5.1.17 Asbestos
- 5.1.18 Contaminated Land
- 5.1.19 Manual Handling
- 5.1.20 Hazardous Substances
- 5.1.21 Noise
- 5.1.22 Vibration
- 5.1.23 Working in Adverse Conditions
- 5.1.24 Exposure to UV Radiation
- 5.1.25 Silica Dust

6. The Health and Safety File

- 6.1 Arrangements for Collection and Gathering of Information
- 6.2 Covid-19

Appendices

- Appendix 1 HCD Ltd Health & Safety Policy Statement
- Appendix 2 Project Hazard & Risk Register
- Appendix 3 Project Specific Rules
- Appendix 4 Project Layout Plan
- Appendix 5 Traffic Management Plan (TMP)
- Appendix 6 Organisations and arrangements
- Appendix 7 Method Statements, Risk Assessments

1. Introduction

This document forms the Construction Phase Health & Safety Plan for the project as required under the Construction (Design & Management) Regulations. It is a live document to be reviewed and amended throughout the life of the project. An initial review is to be undertaken by the Contracts Manager who will complete those appendices that require to be made site specific and are detailed in the index of appendices. A review will be undertaken during visits by the Health and Safety Director.

The project will be carried out in accordance with the Construction (Design & Management) Regulations, Approved Codes of Practice, Guidance Notes and all other relevant Regulations made under the Health & Safety at Work Act. No demolition works are to commence on site until a review of the developed Construction Phase Plan has been undertaken on behalf of TATA Steel by Perses CDM with HCD as the principal contractor

Purpose

This Plan sets out how HCD Ltd will manage the safety, health and environmental aspects of the planned demolition of the Hot Mill Project [hereafter called the Project]. It will be maintained and used for:

1. Providing project staff with instruction and guidance on the project specific arrangements for managing and monitoring safety, health and environment related activities.
2. Issue to the Client, designers, subcontractors and third parties for their information and use.
3. The basis for the Project specific induction training.
4. Demonstrating and monitoring compliance with legal and contract requirements.
5. To comply with the requirements of Construction [Design and Management] Regulations, Approved Code of Practice and Guidance.
6. As principal contractor HCD Ltd will place signage on the site perimeter fencing

1.1 Preparation and Development

HCD Ltd management team shall ensure that this Plan and its supporting documentation are:

1. Developed to comply with the requirements of the Contract.
2. Reviewed, authorised and issued for use.
3. Submitted to the Client for review and acceptance before starting work on the Project.
4. Issued and made available to Project staff so that they are aware of its content and requirements.
5. Reviewed regularly during the monthly 'Project Progress and Performance Review Meeting' and updated as required to reflect changing design and / or project circumstances during the 'lifetime' of the Project.

HCD Ltd will provide advice and guidance on Health, Safety, Environment, Quality and Training to the Project Management team and will monitor activities to ensure compliance.

1.2 Structure

This Plan comprises four main sections:

1. Description of the Project.
2. Management of the Project and operations.
3. Arrangements for controlling significant Project risks.
4. The requirements of the health and safety file.

1.3 Status

It is our aim that in carrying out this project we will avoid, control or manage all foreseeable risks to the health and safety of persons involved in the construction work and any third parties who may be affected by our work, both during construction and in completion of our works from the management and maintenance work to the completed contract[s].

The requirements of this Plan and its supporting documents are mandatory for all Project staff and will be implemented in all aspects of the works to deliver a safe site and working environment.

2. Description of the Works

2.1 Scope and Description of the Project

Full demolition of the Hot Mill down to ground level

The scope of the Works encompasses a series of critical activities that form part of the hazardous insulating material removal, demolition, dismantling, and site clearance of the Llanwern Hot Mill down to slab level. This comprehensive project also involves various process plant structures, pipework, cables, pipe bridges, and plant and equipment. The work includes, but is not limited to, the following key elements:

- Safely decommissioning and removing all process equipment, including machinery, storage tanks, and associated systems.
- The methodical dismantling of structural elements, such as pipework, cables, pipe bridges, and supporting frameworks, while maintaining structural safety throughout the process.
- The controlled demolition of the Hot Mill structures, ensuring minimal impact on the surrounding area and compliance with all regulatory requirements.
- The identification, removal, and safe disposal of hazardous materials, including asbestos, oils, and other potentially dangerous substances, in accordance with legal standards.
- Implementing stringent safety measures, including controlled use of hot work, continuous monitoring of potential hazards, and thorough site cleaning to ensure the area is left in a safe, clear, and environmentally compliant condition.

Due to the potential presence of residual oils, flammable materials, and other hazardous conditions, use the general principals of prevention of hot work (including welding, cutting, and grinding) must be strictly applied and minimised.

Haywood Crushing Demolition Ltd may seek approval from the Principal Designer for any hot work activities and must implement stringent safety measures to mitigate the risks. This includes, but is strict adherence to HCD's hot work rules, conducting thorough risk assessments, establishing fire watches, and ensuring that appropriate fire suppression equipment is readily available.

All hot work activities must be documented and approved as part of the Construction Phase Plan, with clear justifications provided for why such work is necessary and how the associated risks will be managed, all hot works will be subject to a hot work permit.

2.2 Contract Details

Contract Details	
Full Title:	The full demolition of the Hot Mill down to top of floor slab
The Client:	TATA Steel UK Limited, Llanwern Steel works, Newport Telephone: 01633 290022
The Principal Designer:	Jon Sowerby E mail: jon@perses.org.uk Mobile: 07306 291 071 36 Venturefair Drive Edinburgh EH17 8WD
Employers Agent	Not applicable.
Quantity Surveyor	HCD Limited. Unit 14 Haywood Industrial Estate, Wellington, Hereford. HR4 8DZ. Telephone: 01432 839042
The Principal Contractor:	HCD Ltd Unit 14 Haywood Industrial Complex Wellington Hereford HR4 8DZ
Operations Director:	Dave Cobern Email, dave.cobern@hcdltd.com Telephone: 01432 839042 Mobile: 07971 063966
Contracts Manager:	Ian Rodgers Email, Telephone: 01432 839042
Project Manager:	Luke Blackwell Email: luke@hcdltd.com Mobile; 07388222298
HSEQT Director:	Julian Davis Email, Julian.davis@hcdltd.com Mobile; 07500 722658
Project Notification [F10]	F10 displayed on the site notice board.

Contract Details	
HSE Regulator:	Health and Safety Executive. Ty William Morgan, 6 Central Square, Cardiff CF10 1EP 0300 003 1747
Planning Authority:	Newport City Council
Contract Start Date:	Monday 1 st September 2025
Contract Completion Date:	130 Weeks
Project Address:	The Hot Mill TATA Steel works, Llanwern. NP19 4QZ
Project Working Hours:	Monday to Friday: 07:00hrs – 19:00hrs Saturdays: 07:00hrs – 18:00hrs Sundays: 08:00hrs – 16:00hrs

2.3 Existing Conditions

2.3.1 Existing Ground Conditions, Hazardous Materials and Project Survey Information

Survey Information	Note available information or further investigations required / planned
Known History of the Site	Built for Richard Thomas & Baldwins Ltd, the works was originally referred to locally as "The ROB", before being called Spencer Works and later Llanwern under British Steel Corporation. The steelworks site is alongside the South Wales Main Line east of Newport, offering excellent rail transport for the works. It was the first oxygen-blown integrated steelworks in Britain when it opened in 1962. The hot strip mill pioneered the first successful use of a computer for complete mill control. Having won an open internal competition in the 1990s with the Ravenscraig steelworks to become British Steel's leading hot strip mill, in the efforts to increase group and site efficiency in 2001 steelmaking ceased at the site with the loss of 1300 jobs. With hot steel slab now imported by rail from the sister Port Talbot steelworks, the mothballed "heavy end" of the Llanwern works was resultantly demolished in 2004. The hot rolling mill at Llanwern was mothballed in 2009 and then reopened between 2013 and 2015 and then mothballed until a decision was made to close the mill in late 2020. The business now wants to demolish the mill and explore options for reuse or sale of the underlying land. The Hot mill Project aims to prepare the land including and surrounding the Hot mill for potential sale or leasing and to Maintain continuity of business operations.
Topographical Survey	To be completed on completion of contract
Ground Investigations and Conditions	No ground investigations and or conditions notified
Contaminated Land	The demolition of the hot mill is down to ground level only

Survey Information	Note available information or further investigations required / planned
Asbestos and Hazardous Materials	The Hot Mill demolition presents unique challenges due to the potential presence of hazardous materials as identified in the Principal contractors initial surveys. These materials include asbestos, lead-based paints, and oils and greases. A comprehensive inventory of these hazardous materials has been compiled, detailing the nature, location, and risks associated with each. This inventory will be updated in real-time as the project progresses • Safe work practices for asbestos removal, certified by an licenced asbestos removal contractor. • Contained blasting techniques. of structures • Decontamination procedures for areas with oil residues, utilising industry-standard neutralisation and cleaning methods. • All paint to be classified as lead based during hot cutting
Drawings and / or information referenced above will be available for inspection on request within the site offices	

2.3.2 Existing Underground Services

Service Provider	Note organisation and description of services
Electricity	Prior to zonal demolition, all utilities (electricity, gas, water, and sewage) will be safely disconnected in coordination with TATA's energy department to prevent any accidental release or damage. Necessary utilities for the project will be provided without impacting the existing services. Protective measures will be implemented to safeguard any utilities that must remain operational.
Water and Sewerage	Water is supplied to the site internally by TATA. Sewage is sent to a Cess Pit and is collected by an ongoing maintenance scheme. The dismantling works to be undertaken on the vacant ground to the left of the hot mill.
Gas	No under ground gas lines in CDM area
Telecommunications	All telecommunications have been removed and or diverted from the contract area
Fibre Optics and Cable	Live underground service can be found across the hot mill site, ground clearance drawings will be issued <u>by TATA energy</u> and services marked at ground level
Drainage	All drainage will be under TATA ongoing maintenance scheme.
Drawings and/or information referenced above are available for inspection on request within the project offices	
Survey, locate, verify and protect services as required, TATA to issue ground clearance drawings and CAT scan to area prior to work commencing	

2.3.3 Existing Above Ground Services

Service Provider	Note organisation and description of services
Electricity	No overhead power lines crossing the site. GS6 permit in place
Gas	Overhead gas line run west to east north of the Hot Mill. A diversion is being constructed to remove all other gas service to the hot mill although the gas line to the north of the Hot Mill will remain live
Telecoms	No overhead telecoms lines crossing the site. GS6 permit in place
Drawings and/or information referenced above are available for inspection on request within the project offices. Survey, locate, verify and protect services as required	

2.3.4 Existing Buildings, Structures, Plant or Occupied Premises

Type	Effect on Works or Affect by Works – consideration and co-ordination
Industrial Buildings	Adjacent to the west of the Hot Mill are a number of industrial buildings-owned by St Modwen's

2.3.5 Planning Restrictions / Conditions

Restriction Type	Restriction noted in the Contract Documents and Planning, Consents
Working Hours	Monday to Friday: 07:00hrs – 19:00hrs Saturdays: 07:00hrs – 18:00hrs Sundays: 07:00hrs – 16:00hrs
Logistics and Transportation Routes	See Traffic management plan.
Planning Conditions	All permissions and conditions will be adhered too.

2.3.6 Surrounding Land Use and Restrictions

Buildings / Property Types	Details	Implications
Nearest School	Llanwern High school 1.8 kilometres away as the crow fly's	Very limited no implication.
Commercial and / Industrial Units	The site lies within the heart of the steel works.	Very limited no implication.

	St Modwen's Industrial unit located adjacent to the works	Noise, dust to be controlled
Housing	We are sited on the southern side of the hot mill building, the nearest housing is to the North some .78 miles away	Very limited no implication.

2.3.7 Existing Traffic Systems, Features and Restrictions

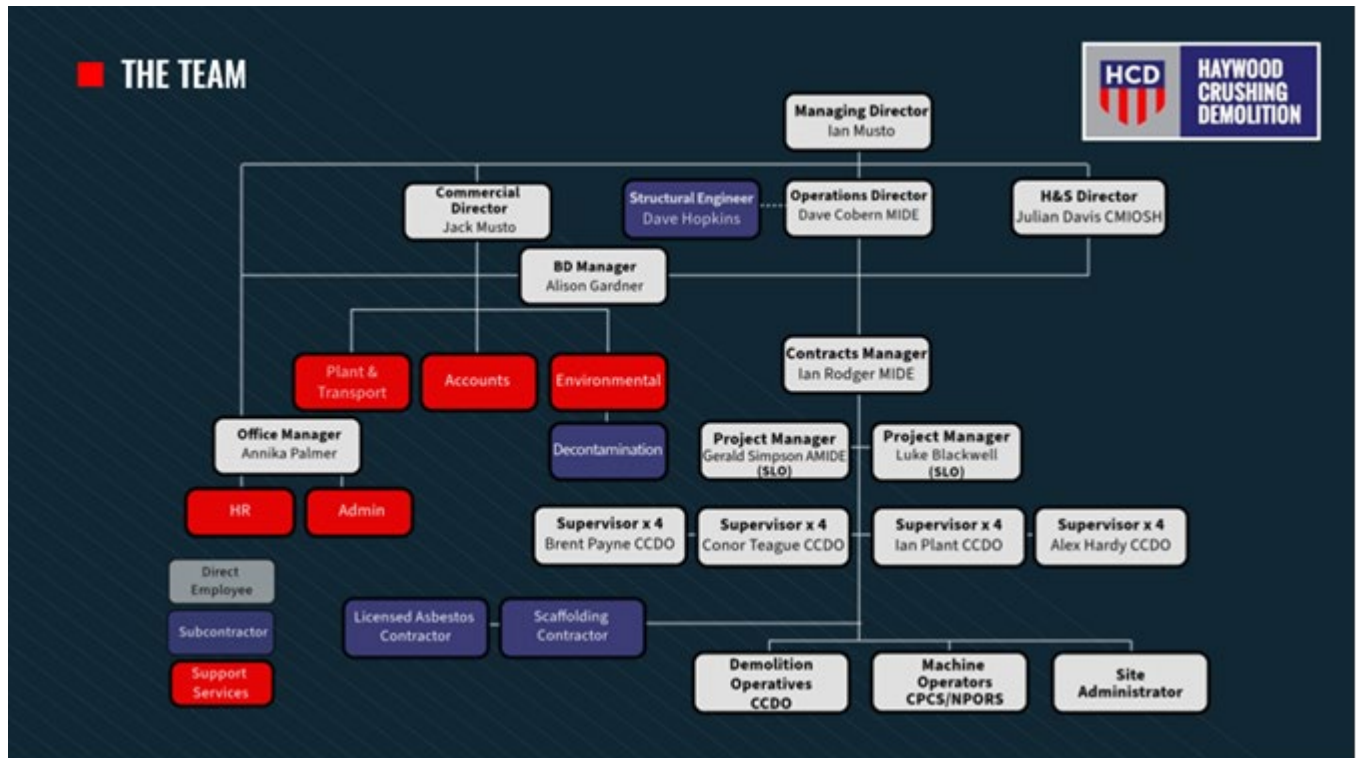
Existing Traffic Systems	Restrictions or Hazards Arising From Existing Traffic Systems
Roads	The site is located within the heart of the steel works, upon entering the steel works, the TMP for the project will be adhered too.
Railway	Being a working steel plant, train movement are frequently made, HCD will comply with all TATA rules when using the various rail crossing points. Main line is 414 metres away
Footpaths	Although limited, footpaths and walkway are within the main steelworks
Rights of Way and / or Way leaves	HCD will not interfere with any rights of way or way leaves
Drawings and/or information referenced in the above are available for inspection on request within the site offices	

2.3.8 Environmental Features and Restrictions

Existing Environmental Features	Restrictions / Hazards Arising From or Features
Ecological surveys have been carried out for the site; full reports will be kept on site for review.	
Nearest Waterway: there is a small body of water located 125m to the north of the hot mill, this pond does have wildfowl living and feeding in the area. The nearest Reen is .25 miles to the south. Drain 6 is located on site TATA will maintain full control of any water that needs to leave site	
Nearest river: No rivers close to the site.	

3. Management of the Work.

3.1 Project Organisation



A Project Organisation Chart showing reporting and communication channels will be defined and maintained.

3.2 Management Responsibility's

The most senior manager on Project, hereafter referred to as the Project Manager, or in his absence, a designated person has overall responsibility for the management of HSEQT issues on the project.

For project management roles and responsibilities See appendix 5 POL 110 Organisations and arrangements

3.3 Management Policy

Our corporate policy on managing safety, health and the environment on every project are defined in our HCD Ltd Health and Safety Policy Statement. This Policy will be implemented in full on this project and a copy of the Policy will be prominently displayed on the Project office notice board at all operating locations to remind people of its requirements and expectations.

3.4 Objectives and Targets

For all HCD Ltd Projects and works we complete:

- ‘That everyone gets home safe:
- how our work impacts on the environment.
- that we exceed our customer's expectations.
- that we deliver on our promises.
- that every project we undertake is on time and on budget;’

To support these and the Client or Contract specific objectives and requirements, the Project Manager and Project Team have defined a set of project specific objectives and targets.

Our Project Objectives and Targets for Health, Safety, Environment, Quality and Training are:

- Environment - Set up monitoring of wastes and fuel consumption to allow future analysis of performance creation of waste targets.
 - HCD Ltd activities have zero negative impact on the surrounding environment.
 - Value engineering solutions promoted and proposed to the Client where identified.
- Training - 100% competent workforce, working towards occupational specific. CCDO, CPCS, CSCS cards and personal development.
- HSEQT Audit HSEQT Audit Monthly by the H & S Director

At the end of each month during the Project Review meetings, the Project Team shall monitor their performance against the Project objectives and targets.

3.5 Management Review

We use a structured series of reviews to assess our performance and initiate corrective action.

Review	Leader	When	Purpose	Record
Project Performance Review	Project Manager	Two Weekly	Project and subcontractor review of site performance and future operations, CPP review – as required;	Minutes and Action List
Progress and Performance Review Meeting	Operations Director	Monthly	Project and management review of progress, performance and future operations;	Minutes and Action List
HSEQT Employee Consultation Meeting	HSEQT Director	Two Monthly	Review performance, site issues, concerns and future operations with the Workforce	Minutes and Action List
End of Project Management Review	Operations Director and HSEQT Director	End of Project	Review performance, monitoring results, SMS, EMS and QMS system feedback, accidents and incidents, sub-contractor management and performance.	Post Contract review

3.6 Best Practice Schemes

We are committed to achieving best practice on our sites and this can be recognised by registering for award schemes. All projects are required to register with the Considerate Constructors Scheme (www.ccscheme.org.uk) to encourage and foster good relations with the local community

3.7 Environmental Goals

HCD Ltd are committed to providing professional, focused contracting services to clients with a commitment to complying with all environmental legislation.

We strive to improve the positive impacts of our operations upon the environment and work towards the reduction and elimination of the negative aspects where possible. We are committed to the prevention of pollution and will assess all new proposed processes to identify potential impacts on the environment prior to implementation.

The project will maintain ongoing communication with environment authorities, as required to ensure compliance with all regulations and to facilitate any required environmental impact studies or permits.

A comprehensive record of all environmental measures, monitoring data, and compliance activities will be maintained and made available for regulatory review.

Through these detailed assessments and proactive strategies, the TATA Steel Demolition Project aims to mitigate environmental risks, ensure regulatory compliance, and minimise its ecological footprint.

We are committed to the continuous improvement of our Environmental Management System.

3.8 Communications & Cooperation

3.8.1 Communicating and Issue of Information

This Construction Phase Plan will be made available to all sub-contractors tendering for work and any updates made to the CPP affecting or having an impact on their works will be communicated to them.

This Construction Phase Plan will also be issued to all contractors assigned to complete works on behalf of the Client directly. These Contractors will be expected to comply with the requirements for co-ordination and co-operation in the execution of the Project and the CPP.

The Project Manager will hold Project Performance Meetings, including Project sub-contractors two weekly and will ensure that all HSEQT issues concerning the project are being suitably addressed, monitored and maintained to the required standards.

HCD Ltd will ensure that a copy of the HSE Notification F10, for the project and all other statutory notices are displayed and maintained on the Project HSEQT Bulletin Board(s) located in A9.

3.8.2 Co-ordination and Co-operation of Subcontractors

The general co-ordination of subcontractor's activities will be subject to a PTW and be planned and agreed by HCD Ltd and demonstrated on the project programme. A programme overview is issued by the Project Manager to all relevant sub-contractors on a by weekly basis.

Detailed co-ordination of work activities being undertaken by groups of subcontractors working in the same or similar vicinity will be achieved by holding regular co-ordination meetings with the relevant subcontractors, or at each subcontractor's progress meeting. The first item on either agenda will be HSEQT related items.

3.8.3 Liaison between Parties on Site

Project meetings will be held throughout the course of the project with health, safety and welfare being a fixed item on the agenda. Designers and principal contractor's representatives together with the client's representative will attend these meetings, to be held either in the HCD Ltd site office or in a TATA steel office. Health, safety and welfare issues are to be contained in the minutes of the meetings. Subcontractors are made aware upon appointment of the requirement to fully co-operate on health, safety, welfare and environmental issues. Their performance is subsequently monitored and reviewed.

It is the responsibility of the employer to ensure that individuals who do not have English as their first language are treated as a special group and a risk assessment is completed identifying that

they are particularly at risk and the control measures that will be introduced to reduce this risk to an acceptable level by carrying out daily briefing, toolbox talks and walk the job.

3.8.4 Exchange of Health and Safety Information between Contractors

Progress meetings will take place with all contractors on site which will review the programme and potential clashes between planned works. All contractors must consider how their work will impact others and freely exchange information to resolve any safety, health or environmental issues.

Contractors must provide clear information about the risks arising from their operations, during meetings including relevant safety procedures, and procedures for dealing with emergencies. This exchange of information should include details of any risks that other parties could not reasonably be expected to know about. The information must be specific to the work.

3.8.5 Project Performance Review Meetings

The purpose of these meetings is to review recent HSEQT performance, to plan future activities and to ensure that all HSEQT issues associated with the construction, design, programme, variations (if requested / required) or unforeseen circumstances are suitably addressed. Resultant information will be issued to all affected contractors.

3.8.6 Employee Consultation

Initial consultation and communication will be completed via the Project Induction process. This process will provide Project Specific detail and information to all persons working on the Project.

An on-site Project Risk Log notice board will be used as a communication tool for all operatives to review prior to accessing the site. This will record and provide details on the significant risks and activities being completed, the control measures that are in place and localised management controls. The Project Risk Log notice board will be updated throughout the duration of the Project.

HCD Ltd will ask representatives from the Project to report any concerns on site to Project Management, and via the HSEQT Employee Consultation process as a means of complying with the 'Health and Safety (Consultation with Employees) Regulations 1996', will ask for feedback from the site employees on areas of concern, for improvement or issues that require addressing to improve safety and performance on Project.

The HSEQT Employee Consultation meetings will be held by the Project HSEQT Director on a two-monthly basis. Those present will be asked to report any issues that may be of concern without recrimination they will be logged as either a near miss/hazard report /incident

All immediate health and safety risks and concerns should be reported directly to the Project Manager. All Project HSEQT Employee Consultation Meetings will be recorded and actioned via Project Employee Consultation Record by daily briefings JMS Briefings and TBT.

3.8.7 Public Consultation

Through co-ordination and consultation with the Client and Perses CDM, will ensure active consultation with the Public to ensure any concerns, fears, queries and questions can be answered to ensure good communication with the Public. This requirement will be tailored to the Project, with feedback from the planning process considered, aspects and concerns raised or highlighted during the process and Client feedback or Project specific requirements.

Examples of communication methods that may be used are:

- Pre-construction Consultation Meeting.
- Public Noticeboards – updated regularly with Project Information and Data.

- Public Project Progress Meetings.
- Project Progress Newsletters / Magazines.
- Project Website, Information and Feedback Portal
- Daily Briefings/JMS Briefings/TBT's

3.9 Design Control

3.9.1 Ensuring the Design Process Complies with CDM Regulations

Designers of permanent and temporary works will identify hazards, prepare design risk assessments, and communicate any residual risks inherent in their design to the Project Team in writing, by issuing a copy of their design risk assessment or by notating them on the relevant drawings.

The Project Team will review this information and issue it to all sub-contractors affected by the risks. Each affected sub-contractor will then incorporate the information within their risk assessment to demonstrate pre-planning of the proposed works has been undertaken.

The Project Team will communicate any significant changes in the design, any risks and hazards from temporary works designs identified that affect health, safety and environmental risks on the Project to the Principal Designer for his information.

3.9.2 Scope of Contractor Design

The following design elements fall within the scope of our Contractual control [i.e. design and build elements of the permanent or temporary works designs for completion of the permanent works]. Our proposed designers and third-party checkers used in the completion of the Project are:

	Design Element	Designer (Company)	Checker (Company)
1	Permanent Works Design	N/A	
2	Contractor Designed Structures	N/A	
3	Contractor Designed Elements		
4	Temporary Works Design	Heras Fencing HCD Ltd TW Bingham Hall Partnership Ltd (demolition)	Luke Blackwell HCD LTD Luke Blackwell HCD Ltd
5	Traffic Management Schemes	Implemented HCD Ltd	Luke Blackwell HCD Ltd

3.9.3 Design Management

Permanent Works Design management will be co-ordinated by the Project Manager through the scheduling of Design Review Meetings with the key parties, Contractor, Designers and Client

representatives. Through the raising and completion of 'Requests for Information' [RFI's], any items requiring review or clarification will be raised.

Temporary Works Design shall be managed by the HCD Ltd Temporary Works Co-ordinator. He will co-ordinate, arrange and manage the preparation of designs, ensure the required checking, verification, certification, acceptance, approval, issue and subsequent change of design data has been completed prior to the installation of Temporary Works.

3.9.4 Exchange of Design Information

Design work will require the relevant drawings, schedules etc. to be viewed for approval. Designers are to provide documented evidence which is to be retained within the working Construction Phase Health & Safety Plan. A copy of the work will be circulated to the design team as appropriate and also to the Principal Designer.

A design/drawing production programme is to be agreed at pre-order stage, to ensure sufficient time is allowed for approvals and the incorporation of comments prior to works commencing on site and to be in sufficient advance of the works to prevent delay.

3.9.5 Handling Design Changes During the Project

Under the Construction (Design and Management) Regulations 2015, the principles for design are to design out or control elements of risk identified. This should take place during the initial stages of design of the proposed project. Construction activities where controls are required due to designers being unable to design out the risks will be provided with risk assessments.

- Where a substantial change in design (which could not or had not been envisaged) is identified, the following sequence must be carried out.
- Designer to examine the changes for health & safety implications and ensure compliance with regulations...
- Identify hazards, assess the risks involved and give considerations to avoid, minimise or control those risks in accordance with the appropriate regulations and Approved Codes of Practice.

HCD Ltd and where applicable the sub-contractor, shall re-examine the health & safety implications of any design changes and implement all necessary control measures to deal with those changes.

3.10 Procurement

3.10.1 General

All subcontractors, designers, material suppliers, plant and equipment suppliers shall be assessed and procured in accordance with the HCD Ltd procedures, as detailed below.

3.10.2 Sub-contractors

Unless specified otherwise by the client, only suppliers and sub-contractors who have been assessed by HCD Ltd will be used to carry out work on site. This includes the requirement for each subcontractor to have a Health and Safety Competence Assessment prior to appointment.

All contractors must hold a relevant competence card, for example CSCS/CPCS/CCDO card (or relevant qualification, if not in scope) and a Passport to Safety Qualification for non management roles. Site management will monitor all contractors on site for behaviour and working practices.

Monitoring of subcontractors by Project management will continue throughout the project to ensure that an appropriate level of competence is maintained. A review of Sub-contractor's

performance throughout and on completion of the project will be completed to ensure competent sub-contractors ONLY are carried forward to new and future works.

Records of our assessments are kept on file by the HSEQT Department.

All personnel attending site whether working on site or as a visitor will be required to conform to HCD Ltd requirements for the wearing of personal protective equipment (PPE), all PPE must be CE marked and suitable for the activity.

Additional task specific PPE must be worn when required, PPE will be reinforced daily by the Project Manager.

3.10.3 Designers

Designers include any organisation carrying out design work directly for HCD Ltd or its sub-contractors. All are required to comply with the CDM Regulations.

All Designers will be assessed competence and resources, selected, and procured in accordance with our Designer Procurement procedures. This includes the requirement for each subcontractor to have a Health and Safety Competence Assessment in prior to appointment.

Records of our assessments are kept on file.

3.11 Project Set-up

3.11.1 Project Layout Plan for the Works

The Project Manager, Luke Blackwell, will ensure that a detailed Project Layout Plan is produced, periodically reviewed to reflect the project programme, maintained and displayed on the Project's HSEQT Board[s] at the entrance points to the Project.

Examples of the information that will be recorded on the Project Layout Plan are:

- Sequence of Development.
- Project access and exit points.
- Proposed pedestrian routes and crossing points.
- Proposed site traffic routes.
- Permanent and temporary fencing.
- Construction compound location.
- Delivery routes
- Public roadways connecting to the site.
- Noise, vibration and dust receptors
- Location of emergency muster points and emergency access routes,. Access to all other areas are prohibited
- Location of welfare facilities – smoking area, First aid main and satellite where appropriate.

A copy of the Plan should be available and provided to sub-contractors, delivery companies visiting site and a copy available for use in an Emergency or for issue to the Emergency Services [as required].

3.11.2 Pedestrian and Vehicles Management

HCD Ltd and its subcontractors will organise the site in such a way that pedestrians and vehicles can move safely and without risk to their health and safety. A Traffic and Logistics Management Plan will be completed by the Project Team to ensure traffic and logistics on the Project is managed and impact of construction works considered.

The Project Manager will identify authorised access and egress points and traffic routes around site. The Project Layout Plan will form the basis of pedestrian and vehicle management. Pedestrians will be segregated where practicable.

Once on the site, all personnel, delivery drivers and visitors must comply with the designated vehicle and pedestrian routes as marked on site and on the Project Layout Plan.

Drivers should observe normal Highway Code requirements and TATA site traffic rules including sign posted speed limits. The CDM area mandatory speed limit is 10 mph. They also need to take additional precautions when in the vicinity of pedestrians, operating plant and areas remaining in common use.

All suppliers will be issued with a copy of the project specific Delivery Driver Project Rules and Project Plan for issue to their drivers delivering materials to site.

3.11.3 Project Rules

The Project Manager will produce a set of project specific Project Rules (see DEMP). These will be included in the induction and a copy is maintained on the HSEQT Notice Board[s].

If any employee, contractor or visitor is in breach of any of the Project rules or is observed carrying out an unsafe action / condition or an environmental non-conformity, HCD Ltd will take appropriate action to make the Project safe and notify both the individual and their company in writing of the breach.

HCD Ltd will require that those personnel involved are disciplined appropriately and in the case of a serious breach, will be removed from Project.

- If any complaints are received from any surrounding properties, these will then be investigated and if required, incorporated into the site rules.
- Smoking is not permitted on site other than in the designated areas.
- Consumption of alcohol on site is strictly forbidden. Any person suspected of being under the influence of drink or drugs will not be permitted on site.
- Radios including personal stereos are not permitted on site.
- The site will be properly secured at nights, weekends and bank holidays, security personnel will be used for out of work hours. All ladder access to scaffolding will be removed or blanked off to prevent unauthorised persons entering or gaining access.
- TATA Steel employees will be protected from all works and associated activities along the perimeter of the site by properly secured hoarding.
- Vehicles will use the designated access routes on site.

3.11.4 Means of Access and Places of Work

HCD Ltd and its sub-contractors will ensure that suitable provision is made to ensure all personnel have a safe means of access to their place of work. These routes will always be maintained and kept clear while the work is being undertaken at that location. All other areas are prohibited.

3.11.5 Visitors

All personnel, including site operatives and visitors on first visit shall be required to report to the steel works security office on arrival. They will then undertake a specific TATA Steel site induction followed by a site specific induction by the project manager Luke Blackwell. All personnel are required to sign 'in' and 'out' of site on all occasions to comply with our procedures for emergency evacuation and roll call.

All delivery drivers will report to the TATA steel security at the main gates upon arrival on site, TATA steel will inform HCD of their arrival to site, and be given a copy of the route to be used to reach the working area, if in any doubt HCD Ltd will escort the delivery vehicle into the site and will then be supervised for loading / unloading controlled by a banksman.

It is the HCD Ltd responsibility to ensure that the visitor is always accompanied and complies with the Project rules. Those persons failing to comply with the Project rules will be dealt with appropriately, and where persistent offences occur, the right to bring visitors to site or accompany visitors around the site will be withdrawn.

3.11.6 Exclusion of Unauthorised People and Project Security

HCD Ltd will ensure that access/egress to the office compound and site is via the designated access point. At each access point, signs will be posted warning of Project hazards, warnings, mandatory requirements and prohibitions.

HCD Ltd Project Management will ensure that all existing fences are maintained around the perimeter of the Project to exclude all other persons not involved with these works. In addition, any individual areas which present a high risk e.g. storage areas, excavations etc. will be individually fenced, before the end of the shift or working day, or as deemed necessary throughout the completion of works during the day.

There are no public rights of way crossing the site, but TATA steel employees may have need to enter the HCD working area to reach areas of the hot mill or working transformers in the area. HCD operatives will escort any TATA employee or their tradesmen that need to access a part of the site through the HCDs working area. HCD will require that any personnel having to pass through the working area, wait at the site compound for a HCD escort.

The requirement for the provision for on-site security will be based on risk. Sites that present a high risk of theft, vandalism or trespass, the consideration of overnight or 24-hour site security will be made. The security of site will be monitored on a regular basis and managed in line with the site requirements. TATA have 24/7 security on site This site will be considered as high risk for theft and security patrols. If required HCD Ltd subject to a full RA and agreement from TATA will have the use of dogs. Any dog used will be under the strict control of the security handler.

Netlon type fencing is not considered suitable for use as protection; it is only to be used for demarcation purposes.

3.11.7 Welfare

Suitable welfare facilities will always be provided for all personnel whilst they are on site. HCD will use the facilities of A9 with kitchen/canteen, internal showers, drying rooms, offices and numerous toilets, plus an existing temporary office set up (located near A9) with 7 offices, drying room, kitchen and further toilets. At readily accessible distance oasis units will be available for use. All facilities will be:

- Sufficient in capacity for the maximum number of people expected to use them.
- Available for use always while people are likely to need them.
- Always maintained in good condition.

- Cleared of all waste daily.
- Non-smoking.
- Designated smoking area provided
- The Project accommodation, welfare and storage will be in positions appropriate for the work being undertaken, and at readily available distances to a toilet or canteen / rest facility.
- Operations involving removal of asbestos require specific welfare facilities to be provided at the site of the operation. These will not be for general use and will be in addition to the project's general welfare.
- Operation involving oxy propane cutting of steel coated in lead paint require specific welfare facilities, these will be sited within the compound area and will be in addition of the general welfare.

Welfare provided will meet the minimum requirements of HSE guidance and guidelines.

3.11.8 COSHH and Fuel Storage

HCD Ltd and its sub-contractors will avoid ignition of flammable substances, mixing of substances and environmental damage, as a result of the inadequate storage, dispensing practices or misuse of any substance hazardous to health, through strict adherence to the company COSHH procedures and the measures identified in project specific risk assessments.

The main substances to be used on Project that will fall under COSHH will be recorded as the substances arrive on site on COSHH Materials Register. Diesel fuel will be stored in a bunded / self-bunded tank complying with the Control of Pollution [Oil Storage] [England] Regulations 2001. Locks will be fitted to all fuel storage tanks plus COSHH locker.

3.12 Information and Training

3.12.1 Induction

All personnel before working on or visiting the site for the first time will be required in the first instance to report to the TATA steel site office for induction. A member of the site management staff will arrange a site-specific induction. Visitors may be exempt a full induction if so, they are always escorted by a member of HCD Ltd staff.

Everyone intending to work on site, complete regular visits or inspections must attend both a TATA steel and HCD Ltd induction. The Project Specific Induction will be completed, providing details of the Project Specific Rules, project outline, the main Project hazards, controls, organisational arrangements, emergency and evacuation procedures and other related items.

All those who have attended the Project induction must sign a HSEQT Project Induction Record.

On projects where the Client's own direct employees and contractors need access on to our site, the Client's representative must ensure that they receive HCD's Project induction before starting work. Appropriate action will be taken where this process is not followed.

Site induction will consist of, but not limited to, the following.

- Contract description and site layout (include car parking, access routes, vehicles, pedestrians and security procedures).
- Contract major risks/precautions and controls
- Contract overview health and safety plan/objectives/targets
- Accident reporting/first aid

- Fire and emergency evacuation points will be to 1st go to the site compound
- Welfare facilities
- Client works restrictions/site rules
- Specific asbestos discovery procedures
- Environmental issues and any site-specific health hazards i.e.
- Specific site rules and emergency procedures.

3.12.2 Daily Activity Briefing

Prior to the commencement of all activities and operations onsite for the day, a Daily Activity Briefing must be completed by the Project Management and Supervision team. The Daily Activity Briefing is a morning communication, recorded and operatives sign to say they received it, all operatives covering the activities planned, deliveries, vehicle movements, offloading arrangements or unusual activities scheduled for that day.

The Project Risk Log notice board will be used as a focus point for communications of the Daily Activity Briefings to ensure operatives are made aware of the on-site risks. The Daily Activity Briefing is a two-way communication with operatives, allowing them to raise any issues, concerns or questions they have relating to the Project.

Sub-contractors must attend the HCD Ltd Daily Activity Briefing in addition to them for completing their own briefing. Their briefing must cover, as a minimum, all items in the Daily Activity Briefing. A member of the HCD Ltd Project Management and Supervision team will randomly and informally attend briefings completed by sub-contractors to ensure these are completed as required.

3.12.3 Toolbox Talks

HSEQT information will be given to employees, direct and subcontract, through a minimum of weekly Toolbox Talks. The subject of these talks will be chosen to suit current site activities but may also include project specific incidents, accidents and environmental issues and recorded.

The completion of the TBT will be recorded on the Project Briefing Register.

Those sub-contractors conducting their own internal Toolbox Talks are required to supply copies of records showing communication, receipt and understanding.

3.12.4 Competence and Training Records

All personnel must have received adequate training to enable them to carry out the task without risks to their health and safety, the environment or others who may be affected by their operation[s]. HCD Ltd will check this proof of competence through the induction process before personnel can start work.

The competency of individuals will be assessed. Those persons that do not meet the minimum standards will not be allowed to work on site or complete tasks or operations that they are not deemed competent.

Managers and supervisors employed in the completion of construction activities on-site will have completed suitable demolition management and supervisory training. The minimum standard or equivalent level of this training for managers is the completion of the 5-day CCDO Manager Black Card and for Supervisors CCDO Gold card

For site operatives, competence can be demonstrated as a minimum by possession of the appropriate CCDO, CSCS, CISRS, CPCS card or industry recognised equivalent. For mobile plant operators, a CPCS card relevant to the item of plant they are operating must be held. Where there is no appropriate CSCS or CPCS card, then competence must be demonstrated by

an industry recognised equivalent or some other reasonable means e.g., in-house training. The assessment of adequacy of this training will be at the discretion of the HCD Ltd

A record of an operative's competence will be recorded on the Project Competence and Training Matrix. This matrix will be continuously updated with new inductees starting on the Project and will be reviewed regularly to ensure all operatives working onsite continue to maintain their competence. All persons attending site must prove competence through the supply of the relevant Training Certificates. An operative will not be deemed competent until a copy of their Training Certificate is supplied to the Project team or HCD Ltd for central records.

Sub-contractors must carry out their own training and provide evidence of such training to HCD Ltd before starting work. HCD Ltd staff training records are maintained on a central database at HCD Ltd Head Office and accessible on site.

3.12.5 Internal and External Training

To ensure the appropriate levels of competence are maintained on site and within the team, the Project team's competence will be cross referenced with the Project Roles and Responsibilities assigned to individuals. Any areas identified that require additional training or 'up skilling' will be addressed, and the appropriate training provided.

The training requirements of individuals will be communicated to the HCD Ltd, and a suitable training course and provider sourced internally or externally, as required.

All Training providers completing training on a Project will be supplied with and must ensure that a Training Attendance Record is completed by those receiving training. A copy of the completed form will be issued to the Project Management team for record and update of the Project Competence and Training Matrix and the original copy issued to HCD Ltd.

3.13 Incident Management

3.13.1 Reporting

As per the TATA Steel UK safe working practice, HCD Ltd will ensure that all employees and contractors report all accidents, incidents, reports of ill health, dangerous occurrences, near misses and any environmental complaints, TATA, Perses CDM and to the Health and Safety Director immediately.

These will be entered in the Accident/Incident/Near Miss Register and investigated at site level using an Accident/Incident/Near Miss Report. This form should be submitted to the project manager within 24 hours and a copy kept on site in a secure location (e.g. locked drawer). If required, the Health and Safety Director will carry out a further investigation using an Accident/Incident/Near Miss Investigation Report.

Accidents and incidents requiring notification to the Health & Safety Executive will be reported as required under the RIDDOR Regulations as amended within the allocated time constraints and on the relevant documentation by the health and Safety Director.

All RIDDOR reportable accidents/incidents (including those involving client staff and members of TATA Steel) will be reported to the Site Manager, Contract Manager, Contract Director, Health & Safety Manager and clients nominated persons.

Fatalities and major incidents will be reported directly to the Contract Director & Managing Director. The Health and Safety Director is responsible for informing the Health & Safety Executive.

3.13.2 Investigation

All Incidents

All incidents will be investigated to determine both immediate and root causes and the findings recorded.

Significant / Reportable Incidents

The Project Manager will notify the HSEQT Advisor and the Operations Director immediately for any accident or incident that is or has the potential to be:

- reportable under Reporting of Injuries Diseases and Dangerous Occurrence Regulations [RIDDOR].
- a significant near miss.
- a significant complaint, communication or visit from the HSE or Local Authority EHO.

The causes of the incident, learning points and control measures identified through site investigation by the HSEQT Advisor and Project Manager, will be implemented and communicated across all Projects.

3.13.3 Emergency Response

Working with and as per the TATA steel UK safe working practice, HCD Ltd will implement and maintain an emergency response plan covering both health and safety and environmental issues surrounding these works.

If an incident occurs on the Hot Mill and, you know immediately that it will require outside emergency services you can call **999**



and give all the details required

- Quote the location to the incident
- Give security all the information requested
- Nominate a meeting point if possible
- Send a guide or yourself to the meeting point
- Wait and then direct the emergency services to the incident location

You **MUST** call Llanwern works protection on the site emergency number **07970282576 01639 872222** and tell them you have phoned **999**

This will ensure that the gate will be ready to meet the emergency services and escort them directly to the incident. Works protection can then stop all rail movements to keep rail crossing clear for the emergency service to be uninterrupted in attending the incident.

All persons on-site are authorised to contact the emergency services in the event of an emergency. In situations beyond the control of HCD Ltd, the provision of specialist contractors will be used to mitigate the risks and manage the situation, where appropriate.

HSEQT implications resulting from any such incident which affect the project or any adjacent land / premises, will be notified to the Client.

The project Manager will ensure that a site-specific fire plan is developed from the site fire risk assessment prior to works commencing. The plan will be developed on an on-going basis throughout the duration of the project with any changes addressed. The plan will always be displayed on site at designated fire points. Fire Prevention on Construction Sites will be used as the basis for managing fire risk on site.

The 'Site Fire and Emergency Evacuation Plan' will address issues for site operatives and the general public such as means of escape, muster points, emergency signs and extinguishers, hydrants and other fire protection equipment sufficient to comply with "Fire Prevention on Construction Sites".

HCD Ltd shall identify emergency procedures and contact numbers 01633 493100 for the nearest hospital The Grange Cwmbran with accident and emergency facilities and display this information clearly on site and within the Construction Phase Plan.

All site personnel are briefed on emergency procedures and arrangements within their safety induction. Escape routes on the site will be defined by the Project Management will be kept clear and regularly checked. The fire procedures will be overseen by the Project Management and will be an integral part of the Project induction training.

3.13.3.1 Fire and Emergency Procedures

Fire Marshals will be identified in rams where required and held in the site office.

The following action is to be taken in the event of a fire or explosion occurring on site: -

Upon discovery of a fire:

- Sound the alarm.
- See above all incident information
- Leave the site via recognised paths and roadways to the assembly point, A9

Upon hearing the fire alarm:

- Vacate your works area.
- Report to the assembly point, wait for the roll call.
- Do not return to the works area until given the all clear by Project Management.

In all cases of fire, HCD Ltd HSEQT Director and the Operations Director are to be notified immediately.

The Project Emergency Assembly point is: **Next to the welfare A9** see emergency plan.

The plan will be revised as the site layout changes i.e., project phases and must clearly identify emergency egress routes and fire points on site. These changes must be disseminated to site

personnel during induction or by way of a toolbox talk and of review meeting as soon as practicable. A record of the toolbox talks and those present must be kept.

The fire assembly point for this site is located at: **Next to the welfare in A9 in the first instance, or roll call at gate 2** see emergency plan.

During the induction process, all personnel will be informed of the specific procedures to be undertaken in the event of an emergency arising. Such procedures will include evacuation routes and emergency exit points, siting of emergency portable firefighting equipment and the location of the Fire Assembly Point.

All temporary escape routes will always be kept clear of obstructions and provided with suitable and sufficient lighting and signage at intervals on long runs and changes of direction to provide good visibility and with secure fixings.

Adequate fire points which include alarms and fire extinguishers will be provided by HCD Ltd at agreed locations on site, the number of fire points required is to be determined by the Site Manager. Fire extinguishers will be located at the welfare unit and at the job face, with a minimum of water and foam extinguishers.

A fire point will consist of a minimum of two fire extinguishers which must be checked weekly to ensure they are serviceable. The type(s) of fire extinguisher will be appropriate to the type(s) of fire risk.

Fire plans will be displayed in the site office and on site.

3.13.4 Fire Risk Assessment

The Project Manager will ensure that a Fire Emergency Plan and Fire Risk Assessment is carried out on the Project office and compound as soon as they are established. The results of the assessment will be recorded on Fire Risk Assessment.

All site personnel are briefed on emergency procedures and arrangements within their safety induction. Escape routes on the site will be defined by the Project Management will be kept clear and regularly checked. The fire procedures will be overseen by the Project Management and will be an integral part of the Project induction training.

In all cases of fire, HCD Ltd HSEQT Director and the Operations Director are to be notified immediately.

3.13.5 Emergency Planning

The Project Manager will:

- Develop emergency plans for foreseeable emergencies and / or environmental impacts identified on-site.
- Ensure that the Emergency Contact Numbers are obtained and recorded on the Project Emergency Contacts and Project Emergency Plan Posters.
- To be displayed at appropriate places including the HSEQT Notice Board[s].

3.13.6 First Aid

HCD Ltd will ensure that an appropriate number of qualified first aid attendants are provided on the project to administer basic first aid, first aid kit will be available at designated points around the site .

HCD Ltd will develop emergency proposals and providing facilities and resource for construction site staff and authorised site visitors. We will include nominated staff names of competent persons undertaking specific roles these will be displayed on the site notice board.

As a minimum, emergency procedures must be implemented for the following:

- Fire
- First Aid incidents
- Impact/damage to underground/unknown services

Where treatment beyond basic first aid is required, the injured person will be advised to attend / taken to the Accident and Emergency Department at the local hospital:

The Grange University Hospital - Emergency Department, Cwmbran NP44 2DF



Tel: 01633 493100 main desk. 999 for emergency. 112 for non-emergency.

After leaving the TATA Steel Works to follow the detailed below hospital.

- > Get on M4 in Monmouthshire from A4810
11 min (4.3 mi)
- > Follow M4 and A4042 to Caerleon Rd/B4236 in Cwmbran
13 min (10.5 mi)
- > Continue on Caerleon Rd/B4236 to your destination
2 min (0.4 mi)

The Grange University Hospital - Emergency Department
Cwmbran NP44 2DF

A map of the most direct route to the Accident and Emergency Department will be maintained on the HSEQT Notice Board[s] and First Aiders for the project will be listed on the using the Project Emergency Plan Posters.

4. Arrangement for Controlling Significant Project Risks

4.1 Significant Project Hazards and Risks

During the completion of the Construction Phase Plan, the following safety and health risks as identified in Construction Design and Management Regulations, Approved Code of Practice and Guidance, Appendix 3, have been reviewed and assessed in their relevance and application for the completion of this phase of works, being the demolition of the Hot Mill at the Llanwern Steel works on behalf of TATA Steel UK.

Applicable to Project:

- See Llanwern Hot Rolled Products Building Risk Assessment/action plan 2025
- Delivery and removal of materials [including waste] and work equipment taking account of any risks to any pedestrians or TATA Steel employees, for example during access to or egress from the site.
- Dealing with services – water, electricity and gas including overhead gas lines and temporary electrical installations.
- Accommodating adjacent land use.
- Stability of structures whilst carrying out the work, including temporary structures and existing building in the area.
- Preventing falls.
- The maintenance of plant and equipment.
- Traffic routes and segregation of vehicles and pedestrians.
- Storage of materials [particularly hazardous materials] and work equipment.
- Manual handling.
- Use of hazardous substances, particularly where there is a need for health monitoring. e.g. Asbestos, oxy propane burning, oils and fuels for the plant and equipment.
- Reducing noise and vibration.
- Exposure to UV radiation [from the sun];
- Fire

The following hazards and risks have been identified as the significant risks that will be prevalent and cannot be avoided or designed out of the project. The 'Top Seven' high risk and significant project activities' for the hot mill.

- **Working at height / falls from height**

Working from MEWPs method statements risk assessments

- **Use of plant and equipment**

Demolition Excavators, telehandlers, MEWPs, lorries
method statements risk assessments

- **Live services**

Underground cable running parallel with the hot mill.
Overhead Gas main north of hot mill running West to East.

- **Ground contamination.**
Oils held within tanks not being fully drained.
- **Traffic routes**
Vehicles drivers not obeying the TMP.
- **Asbestos**
Large amount of AIB lining panels
- **Fire**
Care to be taken when burning no flammable materials

4.2 Risks Identified by the Principal Contractor

HCD Ltd will identify the hazards, evaluate the risk and identify the work activities that require assessment of health, safety and environmental risk. These risks will be recorded in the Project Hazard and Risk Register.

The Project Hazard and Risk Register will be issued to all contractors undertaking work on the project as it will identify the control documents they have to produce before starting their works [see Appendix 2].

4.3 Risk Control

The Project Hazard and Risk Register identifies the anticipated hazards associated with planned activities on the project. These are controlled through activity risk assessments, method statements and safe systems of works, HCD Ltd issue permits for our working activities on site. Records of the preparation approval, receipt, issue and communication of all risk assessments, method statements and permits shall be maintained in the project files.

The Project Manager will examine risk assessments and method statements for works to be completed and from sub-contractors, to ensure there are no glaring omissions only then will a PTW be issued for the work to commence. On completion of the review, feedback and acceptance [as applicable] will be issued using our Third-Party Method Statement Review Form.

An on-site Project Risk Log notice board will be used as a communication tool for all persons to review prior to accessing the site. This will record and provide details on the significant risks and activities being completed, the control measures that are in place and localised management controls. The Project Risk Log notice board will be updated regularly, and the items recorded on the Project Risk Log will be added as they arise to the Project Risk Log Record providing a record of the on-site notice board communications.

The Project Risk Log notice board will be used as a focus point for communications of the Daily Activity Briefings to ensure operatives are made aware of the on-site risks.

4.3.1 Activity Risk Assessment

The Project Team will ensure that Risk assessments are provided for all activities completed on-site. These documents will be:

- prepared and written by a competent person.
- reviewed by a competent person.
- communicated to the workforce and signed for.

4.3.2 Method Statements

All operations will require the provision of risk assessments and method statements prior to works commencing on site.

Site specific risk assessments and method statements must be provided at least seven days prior to work commencing on site to allow time for the method to be reviewed.

The HCD Ltd Project Manager may in special circumstances allow site specific risk assessments and method statements to be provided up to 24 hours prior to work commencing but must ensure a thorough review of the documentation by them before work is permitted to start. This will allow planning, consideration of operational methods and any specialist contractor requirements to ensure safe systems of works are developed prior to the programmed works.

Contractors are monitored on site and performance is documented and reviewed at post contract meetings.

All personnel involved in the task must be briefed on the content of the method statement and sign the document to confirm they understand and will comply with the method statement.

At the start of the Project and throughout, a review of the construction programme will be completed, and a Method Statement, Risk Assessment, Lifting Plan and Inspection Test Plan Schedule will be completed to ensure works are identified early.

- prepared and written by a competent person.
- reviewed by a competent person.
- communicated to the workforce and signed for.

Method statements must cover the following aspects of the works as a minimum:

- the scope of the work.
- organisation.
- preparation
- method and sequence.
- materials.
- plant and equipment.
- safety.
- environment.
- emergency procedures.
- protection of the works [where applicable].
- quality checks, inspection and testing.
- records and monitoring.

Method statements required throughout the project (the list not definitive)

- Setting up welfare facilities
- Hoardings, fencing, access control
- Establishment emergency controls and assembly points
- Safe isolation procedures
- Structural stability during demolition
- Manual removal of non-load bearing elements, fixtures, fittings, and internal finishes.
- Segregation of waste streams.

- Lifting loose items with overhead cranes
- Mechanical Demolition Method Statement, use of water sprays, misting cannons. Noise controls
- Processing
- Use of explosives or pre-weakening techniques to bring down a structure in a controlled manner

4.3.3 Permits

Activities with a residual high risk also require an specialised permit to start the activity. Permits are prepared and implemented for all relevant activities. The current Permits used by HCD Ltd are:

- Permit to work.
- Permit to Break ground.
- Hot Works Permits. (as required)
- Permit to Work on / near Live Services.
- Confined space permit
- Contract lift permit.

4.3.4 Change Control

All changes to work and methods resulting from a client instruction, variation order, revised drawing, query response, change in scope of works, change in suitability of methods, will be reviewed by a competent person to assess the implications on the planned method of working and the safe system of work adopted.

All works completed must be in line with the method statement or safe system of work reviewed and accepted. Where change occurs that invalidates these, works stop, the situation is reviewed, reassessed and agree a new method of work, update the method statement and risk assessment and re-brief all persons involve in the works.

4.3.5 Control of Subcontractors

HCD Ltd will apply the following controls to manage our subcontractors:

- review and acceptance of risk assessments, method statement and other documentation prior to commencement.
- agreement on the submission frequency of records.
- routine surveillance of work to check they are working to accepted methods and that work is being completed in accordance and to the drawings and Specifications required or expected.
- final inspection of completed work.

4.4 Control of Materials

4.4.1 General Control

Suppliers are required to provide adequate health and safety information to support their products. HCD Ltd and its subcontractors, in conjunction with the Client and Designers, will always be required to endeavour to substitute hazardous materials with less harmful ones.

Project Specific COSHH Assessments for all hazardous materials / substances to be used on the project will be provided, reviewed and communicated to ensure adequate control measures are in place to minimise the potential risk to operatives or the environment.

4.4.2 Delivery & Removal of Materials (including Waste)

HCD Ltd will maintain safe, unobstructed access to the remaining Steel works, insofar as access may be affected by the works. Deliveries to the site must not affect the TATA Steels internal road network or the access to any remaining parts of the steel works in the area.

All deliveries will be by prior arrangement with the TATA steel UK security team. The Site Manager will liaise with the Plant Manager when large loads are likely to be delivered, noting that all transport movements into the site have a 24hr booking in time with TATA steel ensuring no disruption to remaining steel works or the HCD Ltd working area within the works.

Reference should be made to the Site Traffic Management Plan when arranging for deliveries to site. Unloading of all deliveries shall take place in various site compounds and be totally segregated from other site personnel to ensure they are free from risk. A banksman is to be used during all delivery operations. Banksman will primarily be used as lookouts to ensure that collision with persons does not occur during vehicle unloading and reversing operations.

The site will be accessed via: The main security gates into the steel works, following the TMP to the HCD Ltd within the steel works.

No mechanical plant or vehicles will be permitted to leave the ring-fenced working area. HCD Ltd will protect the access road running the length of the hot mill. Vehicles are not to be permitted to reverse on the site without a banksman.

All waste products will be removed from site with a licenced waste carrier whilst adhering to relevant regulations and where required a Duty of Care Movement Notice filed. These will include consignment notes for hazardous waste transfers. Waste will be removed from site by HCD Ltd.

All movement of waste will be covered by a waste transfer note which will detail the name of the waste transfer contractor, the type of waste, the quantity of waste, the registration details of the vehicle, carrier licences number and the final location of the waste.

4.4.3 Storage and Distribution

HCD Ltd and its subcontractors will handle, store and distribute all materials in accordance with manufacturers' / suppliers' recommendations. Agreement must be sought by subcontractors for the storage of large quantities of materials on-site.

High value and hazardous materials will be stored in designated areas, as marked on the Site Layout Plan. Materials removed from storage and not used in the shift will be returned at the end of the working day to the secure storage facilities.

Where gas or oxygen cylinders (or similar vessels) are used on site, they are to be secured in a vertical position within a caged enclosure in an open-air location. There may be adverse reactions between various gases. This should be checked, and such gases kept in separate locations.

HCD Ltd will provide an area for storage of materials, skips for the segregation of waste materials will be located in a segregated area on site. Contractors are required to place all waste material in the correct skip to comply with our waste management systems.

The storage of materials on the roof of buildings will not be allowed, any materials left over at the end of the shift will be returned to the storage area in the compound. No material will be stored on the roof of any storage container on site accommodation.

4.3.4 COSHH and Fuel Storage

HCD Ltd and its sub-contractors will avoid ignition of flammable substances, mixing of substances and environmental damage, as a result of the inadequate storage, dispensing practices or misuse of any substance hazardous to health, through strict adherence to the company COSHH procedures and the measures identified in project specific risk assessments.

The main substances to be used on Project that will fall under COSHH will be recorded as the substances arrive on site on COSHH Materials Register. Diesel fuel will be stored in a bunded / self-bunded tank complying with the Control of Pollution [Oil Storage] [England] Regulations. Locks will be fitted to all fuel storage tanks.

Fuels, oils, LPG and other hazardous materials must be stored in accordance with legislative requirements and guidance.

4.4.5 Control of Plant and Equipment

Suppliers of plant and equipment are required to produce adequate health and safety information to support their products. This will include, where appropriate, proof of statutory test and examination and / or inclusion in a planned preventative maintenance scheme.

All operators of plant will ensure that suitable and sufficient steps are taken to prevent or control the unintended movement of any vehicle by removing the keys or disabling the plant. No person shall ride on any vehicle used for the purposes of construction work, unless they are in a safe place in that vehicle provided for that purpose and or remains on any vehicle during the loading or unloading of loose material unless a safe place of work is provided and maintained for that person.

4.4.6 Personal Protective Equipment (PPE)

Everyone must always wear the appropriate Personal Protective Equipment (PPE) .

HCD Ltd will provide appropriate protective clothing and equipment to its employees.

Subcontractors will be responsible for providing appropriate PPE to their own employees.

In the event of a failure by a subcontractor to provide or use the necessary protective clothing or equipment, the subcontractor's work activity will be stopped until corrective action is taken, or the necessary items are supplied. If doing so, the items supplied must be appropriate and suitable for the risks identified. In either case the cost is to be borne by the subcontractor. The issue of all PPE will be recorded on PPE Issue Register and daily PPE compliance checks will be recorded.

4.5 Temporary Works

HCD Ltd and its subcontractors will ensure that all temporary works are always adequately designed and constructed to ensure their stability in all foreseeable circumstances. All temporary works will be inspected prior to use / load and at regular intervals thereafter as indicated by the designer to ensure their continued integrity / stability.

The Project Manager will appoint the Project Temporary Works Co-ordinator [TWC], who will oversee the production and approval of temporary works designs. The nomination and appointment of the TWC will be made using 'Appointment Letter – Temporary Works'.

Where the requirement for additional training is identified or requested, this will be authorised by the Project Manager.

4.6 Monitoring Arrangements

To ensure the management on-site is following the standards expected by HCD Ltd, regular monitoring of the Projects activities will be conducted. The results of all monitoring activities will be:

1. Reported to Project Management and all those affected by the findings.
2. Kept on file and available for inspection on site.
3. Summarised in the monthly progress reports.
4. Followed up during the next check to verify that effective implementation of corrective action.

4.6.1 Project HSEQT Audits

The HSEQT Director will Audit the Project using the appropriate Project HSEQT Audit form. Reviews performance, identifying good practice, areas for improvement and NCR's, conducted on a monthly basis.

These audits are used to check the effective use of the HSEQT Management on site. Additional inspection of the Project will be conducted between the Audits with the Project Manager to check that consistently high standards are being used on the Project.

4.6.2 Statutory Inspections and Registers

We will ensure that all areas of the Project are, as far as is reasonable, safe and without risk to the health and safety of personnel on site, third parties or the environment.

All plant and equipment used on site shall be suitable for the purpose of its intended use, used in compliance with the manufacturer's instructions and regularly inspected to ensure its safety and integrity is maintained.

We will ensure that where a statutory inspection is required, a competent person will prepare a report containing the specified information and records.

Statutory Inspections include but are not limited to:

- Plant Register
- Working Platform Inspection
- Plant Operator's Inspection
- Plant
- Lifting Equipment
- Lifting Appliances
- Kit requiring calibrations e.g. cat & Genny will be checked for calibration

4.6.3 Establishing Exclusion Zones

HCD Ltd will establish exclusion zone following NFDC Exclusion Zones Guidance Notes DRG110 .

RED ZONE – Is an EXCLUSION ZONE that is defined as being the most restricted and is “an area of a site where no person may work”. Different structures require different methods of demolition. Key to designing and selecting the method is considering what can go wrong. Those decisions will lead to the size and nature of the designed RED ZONE.

AMBER ZONE – There may be other areas on site where access will be RESTRICTED to work undertaken by specialist occupationally qualified personnel as required by risk assessment and method statements. These are called AMBER ZONES.

REST OF SITE – Access to other areas of the site, where demolition work is not being carried out, will be allowed for inducted and authorised workers.

GREEN ZONES – Some sites operate a GREEN or SAFE zone area where no PPE is required such as offices, site welfare and car parking.

Demolition is a fluid process and the exact position of zones are likely to move and change with time.

5. Safety Risks

5.1.1 Services including Disconnection and Termination

The client will arrange for the disconnection of the existing electricity supplies to the Hot Mill. Removal work will not commence until written confirmation of termination of services has been received.

As the remaining Steel works is operational HCD Ltd will not interfere with any other service on site.

All existing sewers, drainage systems, gas, electric, water and all other services around the site and to adjoining premises within the steel works will be fully maintained during the progress of the works by TATA.

Any service installed as temporary supplies, or as part of the permanent works, will be accurately plotted on a site plan by the Engineer/Site Manager and will be physically marked along its route by means of timber stakes and notices.

The HCD Ltd working area does contain overhead Live Gas service, however the route to the site will be checked for overhead wires and cables to ensure all plant and equipment using the TMP can safely pass through.

The known electrical underground service will be CAT scanned, with road marking spray paint used to show the route of the cable. HCD Ltd will further protect this cable by placing between .3 to 1m of material over the top of the cable effectively placing it deeper into the ground as the working platform is built to the front of the transformer pens.

All electrical tools will be battery operated or run on 110 volts.

5.1.2 Adjacent Land Use

Buildings associated with steel production, mostly redundant near working area. Industrial area to the west owned by St Modwen

5.1.3 Stability of Structures

Look to be in a sound stable condition. HCD to need to confirm with Structural Engineer when writing JMS

5.1.4 Preventing Falls

Where work is undertaken at height, which includes the means of access, it must be undertaken safely and have the appropriate features to prevent or arrest a fall. When selecting equipment for work at height.

- Use the most suitable equipment.
- Fall prevention before fall mitigation
- Give collective protection measures.
- Priority over individual protection measures

Site Managers will ensure that the work is properly planned, appropriately supervised and carried out in as safe way as possible as is reasonably practicable.

Employees and contractors must report to the Site Manager any safety hazards associated with work at height and use equipment correctly. All equipment will be inspected prior to use. Do not use defective equipment.

5.1.5 The Use of “Bandstands” is Prohibited on Site

5.1.6 Podiums

Podiums will be used on this project.

5.1.7 Mobile Towers

Mobile towers will be used on this project operatives shall be trained in the erection of mobile towers.

5.1.8 Mobile Elevating Work Platforms (MEWPS)

MEWPs may only be operated by trained CPCs/NPORS/IPAF. Evidence of such training e.g. (IPAF Certificate) must be provided before personnel are permitted to use MEWPs on site. Personnel using Boom MEWPs must wear a restraint harness.

5.1.9 Scaffolding

Scaffolding will be fully boarded (working platforms) and complete with Haki stairs or internal access ladders, handrails, intermediate rails and toe boards. Where required, additional guards infill may be required to prevent materials / tools falling from the scaffold. Any items attached to the scaffold (chutes, banners or debris netting) will require a design.

Modifications and alterations will only be carried out by the appointed scaffold company.

Handover certificates (scaf tag or 7 day inspection) for all scaffolds and any amendments to the scaffold will be retained in the site safety file.

5.1.10 Work with or near fragile materials

Work on or near fragile materials such as profiled roof sheets or roof lights will be undertaken from underneath using a suitable work platform wherever practicable. If the work cannot be completed from underneath and workers need access to the topside of the roof, a mobile work platform (MEWP) that allows people to work from within the basket without standing on the roof will be used.

If access onto the fragile roof cannot be avoided, the fall distance will be reduced by;

- Installing perimeter edge protection around any fragile area and using staging on the roof surface to spread the loads
- Ensuring all the work and access staging or platforms is fitted with guard rails, installing safety nets underneath the roof and the use of a harness system.

5.1.11 Control of Lifting Operations

All lifting operations will be carried out in accordance with the Lifting Operations and Lifting Equipment Regulations 1998 with reference to HSE guidance document, safe use of lifting equipment. A site and operation specific, lift plan must be produced and approved prior to any lifting operations being undertaken on site. All lifting operations will generally be contract lift. Permit to contract lift required to be completed prior to any lifting starting

5.1.12 Maintenance of Plant and Equipment

Suppliers of plant and equipment are required to produce adequate health and safety information to support their products. This will include, where appropriate, proof of statutory test and examination and / or inclusion in a planned preventative maintenance scheme.

All plant & equipment i.e., MEWPs, hoists, cranes, forklift trucks etc intended for use on site, will have a certificate of conformity, carry out a current test certificate, copies must be available i.e. – stored / displayed on the equipment or filed in the site office plus daily pre use checks.

Details of all contractor plant must be entered on the sub-contractor plant and equipment register within the site safety file.

Operators are required to produce training certification / confirmation of competence for all non-hand-held plant and equipment and the erection of mobile towers, which must be copied and filed on site.

5.1.13 Excavations.

Although HCD are not expected to break ground in the full meaning of the word, there will be pits to be back filled. The plant operators will not dig past the existing ground levels in the area.

5.1.14 Slips, Trips and Falls

Access routes are always to be kept clear of obstructions. Operatives are to use battery powered tools whenever possible to avoid cables crossing the ground. Ensure access into site cabins is properly constructed. The work areas are kept as tidy as possible whilst the work's going on.

5.1.15 Underground Services

There are known electrical services below the ground floor slabs access points will be plated over and its route marked out, using road marking spray paint. No access to be allowed to this area once access covered.

5.1.16 Health Risks

If at any time during the course of the project any suspicious materials i.e. asbestos materials are uncovered, work will cease immediately, the principal designer and/or client notified, and the area sealed with access prohibited.

The material will be sampled and analysed by a competent contractor working in accordance with HSG 264 (2nd Edition 2012) Asbestos – the survey guide. Should it be found that the material contains asbestos, a licenced contractor shall be engaged to remove it.

Where there has been a historical problem with pigeons. The dangers of psittacosis must be identified during the site induction to all visitors to site. The specific hazard presented should be assessed by the Site Manager prior to works commencing in that area and the appropriate controls established to minimise the exposure of operatives to any droppings that may be present.

Wherever work is being carried out in proximity to sewers or standing water sources such as existing drainage, consideration should be given to the risk arising from Weils Disease (Leptospirosis).

5.1.17 Asbestos

Prior to any demolition works being carried out, a fully intrusive survey has been carried out to identify any asbestos in relation to the work being undertaken. Where licensed asbestos is identified, an appropriate contractor (licensed by the HSE) will be appointed for its removal. The contractor undertaking the works will be expected to allow for appropriate removal methodologies for the asbestos materials on the site.

A full and heavy air monitoring regime is to be implemented during the asbestos removal process with 4 stage clearance testing certifications to be undertaken by an independent UKAS approved laboratory.

Where unlicensed asbestos is identified, this will be removed by trained operatives from HCD (in compliance with the Asbestos Regulations 2012).

5.1.18 Contaminated Land

There is a large amount of unused oils left in tanks, these will be emptied and cleaned by a specialist contractor, with all oils being recycled IBC's will be used to collect any remaining oils if any quantity is found to remain in tanks.

Any residue of oils, HCD will cover with granules and or mop up with nappies, rags. Contained with oil barriers then dispose of at a registered facility

HCD Ltd will have several spill kits and bags of absorb-all pads on site to wipe down and clean any oil residue. As any product is used, the site management team will replace the items ensuring the site always has capacity to clean up any spills on site.

The results of the waste related ground investigation survey have not been made available to identify any potential contamination within the soils upon the site. If any contamination is found then removal and disposal will be determined once the areas have been exposed to see the safest way to remove the contamination from the exposed ground conditions.

5.1.19 Manual Handling

Whenever practicable the need to carry out manual handling, which creates risk of injury, will be avoided through the use of mechanical handling aids. Where avoidance is not practicable an assessment of the lifting operation will be undertaken to reduce the likelihood of injury either through breaking the load down or team lifting.

5.1.20 Hazardous Substances

Contractors, who intend to use hazardous substances on site, are to submit COSHH assessments and intended control measures, to the Site Manager prior to commencing work. The contractor should be able to demonstrate there is no less hazardous substance available that could be used in its place, in accordance with the hierarchy of risk control measures.

Health monitoring must be provided by the contractor where specified within the COSHH assessment.

5.1.21 Noise

The adoption of Best Practicable Means, as defined in the Control of Pollution Act 1974 and The Control of Noise at Work Regulations 2005 is usually the most effective means of controlling noise from construction and demolition sites. The following measures will be implemented as appropriate;

- Any compressors brought on to site will be silenced or sound reduced models, fitted with acoustic enclosures.
- Pneumatic tools will be fitted with silencers or mufflers.
- Deliveries will be programmed to arrive during daytime hours only.
- Care will be taken when loading or unloading vehicles to minimise disturbance to local residents.
- Delivery vehicles will be prohibited from waiting within the site with their engines running, vehicles will not be permitted to wait on side roads.
- All plant items will be properly maintained and operated according to the manufacturers recommendations to avoid causing excessive noise. All plant should be sited so that the noise impact at nearby noise-sensitive properties is minimised.
- Local hoarding, screens or barriers will be erected as necessary to shield particularly noisy activities.

Problems concerning noise from construction works, can sometimes be avoided by taking a considerate and neighbourly approach to relations with local residents. Works will not be undertaken outside the hours agreed with the local authority as part of the Section 61 agreement.

5.1.22 Vibration

Vibration will be controlled as much as is practicable by selecting plant and machinery suitable for the task and following working methods contained in BS 5228 – 2 – 2009. HCD Ltd shall wherever practicable.

- Eliminate the use of vibrating tools e.g., pile crusher instead of handheld breakers.
- Introduce job rotation to limit exposure from vibration.

HCD Ltd plus subcontractors must maintain a record of exposure and ensure operatives do not exceed the limit value, where necessary health surveillance may be required.

5.1.23 Working in Adverse Conditions

During windy conditions, all work at height and on MEWPs will be suspended, this includes lifting operations. If employees or sub-contractors are working during adverse weather conditions, all required PPE must be worn.

5.1.24 Exposure to UV Radiation

Exposure to UV radiation falls into two categories, short term such as sunburn or long term which may lead to skin cancer.

Preventative measures will be enforced with include such as making the wearing of shirts compulsory and the wearing of hats with brims, working in shaded areas where possible and the application of sun cream and lotions.

5.1.25 Silica Dust

Stones, rocks, sands and clays may contain large amounts of crystalline silica. They are used to make kerbs, flags, bricks, tiles and concrete. Even plastic kerbs can contain silica-based filler. Cutting these materials using power tools produces very respirable crystalline silica (RCS) particles. These particles are small, and you cannot always see dust given out by cutting.

Wherever, practicable, block cutters will be used, if power tools are required, water will be used to suppress dust. All modern cut-off saws have an attachment for a water hose. The water can be supplied from a mains feed (the best option) or a pressurised water bottle. Those involved in the works will still be required to wear respiratory protection. All concrete demolition will be sprayed with HCD atomisers systems at all times.

5.1.26 Lead Paint

Given the age and nature of the building HCD Ltd will record that the structure has been painted with a lead based paint. Operatives will follow the high standard of personal hygiene to be observed by burners. Suitable and sufficient washing facilities including showers Wash hands and face before eating, drinking or smoking. Scrub under finger nails.

Protective clothing that is appropriate for the work to be undertaken, i.e. flame retardant, must cover all parts of a burner's own clothing, and resist penetration by lead in the form of dust or fume and protect the burner's own clothing. whose it is so it can easily be sorted and returned to the correct user.

A minimum of three sets of protective clothing to be issued to an individual, one to wear , one in wash and one spare.. Provision of suitable storage for the protective clothing as well as separate clothing for employees own clothes. Laundry services to be arranged for dirty protective clothing ensuring they dirty protective clothing doesn't get taken home.

Washing and showering facilities to be located between the facility for storing work clothing and protective clothing:

This is to allow employees:

- to remove lead-contaminated clothing and footwear in one room or area;
- then to pass into the washing and bathing area; and
- finally pass into the clean room or area where they can put on clean clothing and footwear

(a) washbasins with dimensions that allow people to immerse their arms up to the elbow;

(b) a constant supply of running hot and cold or warm water;

(c) soap or other suitable means of cleaning;

6 The Health & Safety File

6.1 Arrangements for Collection and Gathering of Information

HCD Ltd is required to collate health and safety file information for submission to the principal designer Perses CDM (in accordance with the Construction, Design and Management Regulations).

Discussing and agreeing the content of the H&S File with the Principal Designer at an early stage so that the required information and records are identified. Informing all subcontractors and suppliers of the information and records required. Obtaining and compiling the required information. Issuing the information to the Principal Designer at the agreed time.

When putting together the health and safety file, you should consider including information about each of the following where they are relevant to the health and safety of any future construction work. The level of detail should allow the likely risks to be identified and addressed by those carrying out the work, the requirements of the Health & Safety files are detailed below.

- Project Description Including all subcontract works.
- Residual hazards
- Hazardous materials
- As Installed / As Built Drawings
- Safe removal of materials
- Test Certification (if required)
- Location of retained services.
- Retained structure details (if any)
- Handover of any temporary/semi-permanent works

The Contract Manager will confirm the required format, either hard copy of electronic or ensure it is delivered to the Health & Safety File Administrator at Head Office.

The Health and Safety Director will track the information provided by suppliers and contractors and will inform the Contract Manager if Health & Safety file information is not provided.

The Health and Safety Director will liaise with the Contracts Manager and inform them of the status of the information received one week before practical date and again, one week before the target date for delivering the Health & Safety file to the client.

The Health and Safety Director will forward to the principal designer and/or client the information provided by the contractors for the compilation of the health and safety file.

6.2 Covid-19

The company is still observing some covid extra covid rules to the current government recommendations should a person test positive for covid they may be allowed to attend site but must inform site management of a positive test result and may have to remain at home for seven days. This is to protect them and others working in a high-risk industry.

Also, those whom have been in contact with that HCD member or sub-contractor must test each day for three days to be proven clear if positive they must also inform the site management of the results, for the reasons listed above.

Appendix 1

HCD Ltd Health & Safety Policy Statement

Policy - General Statement of Intent

The Managing Director has overall accountability and responsibility for Health and Safety within the Company. Our objective is to provide and maintain Safe and Healthy working conditions, Equipment and Systems of work for all our Employees.

We also accept our responsibility for the Health and Safety of other people who may be affected by our activities. Health and Safety is everybody's responsibility, with Management accountability for embedding Health and Safety within the decision-making process.

All Employees have a responsibility to co-operate with the Directors, Managers and Supervisors to achieve a healthy and safe workplace or site and to take reasonable care of themselves and others. It is the Policy of HCD Ltd to promote the requirements of the Health and Safety at Work Act and to take all reasonable actions to stimulate and encourage the highest standards of Health and Safety at work by:

The provision and maintenance of Plant and systems of work so that they are, as far is reasonably practicable, safe and without risks to health.

Arrangements for ensuring, as far is reasonably practicable, safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances.

The provision of such information, instruction, training and supervision as is necessary to ensure, so far as is reasonably practicable the Health and Safety at work of our employees.

So far as is reasonably practicable in any place of work under the Company's control, the maintenance of it in a safe condition, without risks to health and the provision and maintenance of means of access to and egress from it that are safe and without such risks.

The provision and maintenance of a working environment for our Employees and Visitors that is, so far as is reasonably practicable, safe, without risks to health and adequate as regards facilities and arrangements for their Welfare at Work.

We will ensure that all works will be planned in advance in accordance with CDM 2015, other Statutory Legislation and Codes of Practice which will be relevant.

We will communicate and consult with our Employees through regular meetings and other communication means. We will also use notice boards to display Health and Safety information and performance.

Regular audits will be undertaken to ensure that this policy and our health and safety management system remains valid and effective.

This policy will be reviewed annually and revised in the light of new Legislative, organisational or procedural changes.

Any revisions made will be brought to the attention of all employees without delay.

Signed:

A handwritten signature in black ink, appearing to read 'I. Musto', is located below the 'Signed:' text.

Ian Musto

Managing Director

Appendix 2

Project Hazard & Risk Register

Site Access.

- Will be via gate as required throughout the project programme into the working area.
- Gates will remain closed and locked when not in use.
- Banksman to guide all plant and transport movement on site.

Security of the site.

- The boundary of the site consists of 2.4 palisade fencing is secure and fit for purpose.
- Site access gates to remain locked when not in use and overnight.
- 24hr contact details to be posted on the main site access gates.
- TATA 24/7 security
- Out of hours and weekend security patrols using dogs handlers (if required).

Services.

- All disconnection of services to be on site and displayed on the site notice boards.
- Permits to be issued for breaking ground, permit to be accompanied by a copy of the CAT scan and a ground clearance certificate for the area.
- Any unknown service to be brought to the attention of TATA Steel UK.
- Service drawing for the area to be given to HCD Ltd by TATA steel UK.

Demolition.

- All safeguarding systems to be in place.
- Drop zones to be fenced and monitored always under the control of the site supervisor.
- Waste to be segregated at source.

Site waste.

- All waste to be removed from site as it is generated.
- All oil residue to be cleaned away and disposed of in the correct manner.
- No loaded bins to be stored on site.
- Waste streams to be adhered too.

Site Grades.

- Site to be graded off upon completion of the works.
- Site to be left in a clean walkable condition.

Fencing.

- Banksman to be in place when installing internal hedges panels for exclusion zones.
- Any breaches to the fence lines to be blocked off to keep the site secure.
- Daily fence checks made, and results recorded.

Appendix 3

Project Specific Rules

Site rules will be posted in the site office and welfare units and will make up part of the site induction.

Key Rules and safe behaviours for this site include.

- I will only perform tasks or activities for which I am trained and authorised to do so.
- I will **NOT** report for duty under the influence of drugs or Alcohol.
- I will **NOT** override or shortcut any safety devices or guards & I will always follow isolation procedures when working on mobile plant and equipment.
- I will **ALWAYS** challenge unsafe acts or conditions.
- I will report **ALL** accidents, incidents & near misses **IMMEDIATELY**.
- I will ensure my workplace is maintained to a good housekeeping standard.
- I will **ALWAYS** wear the correct PPE when and where required.
- I will not misuse the welfare facilities provided for the site.
- I will **ALWAYS** use the correct route to the working area.
- Remember this is a non-smoking site, only smoke or vape in the designated areas.

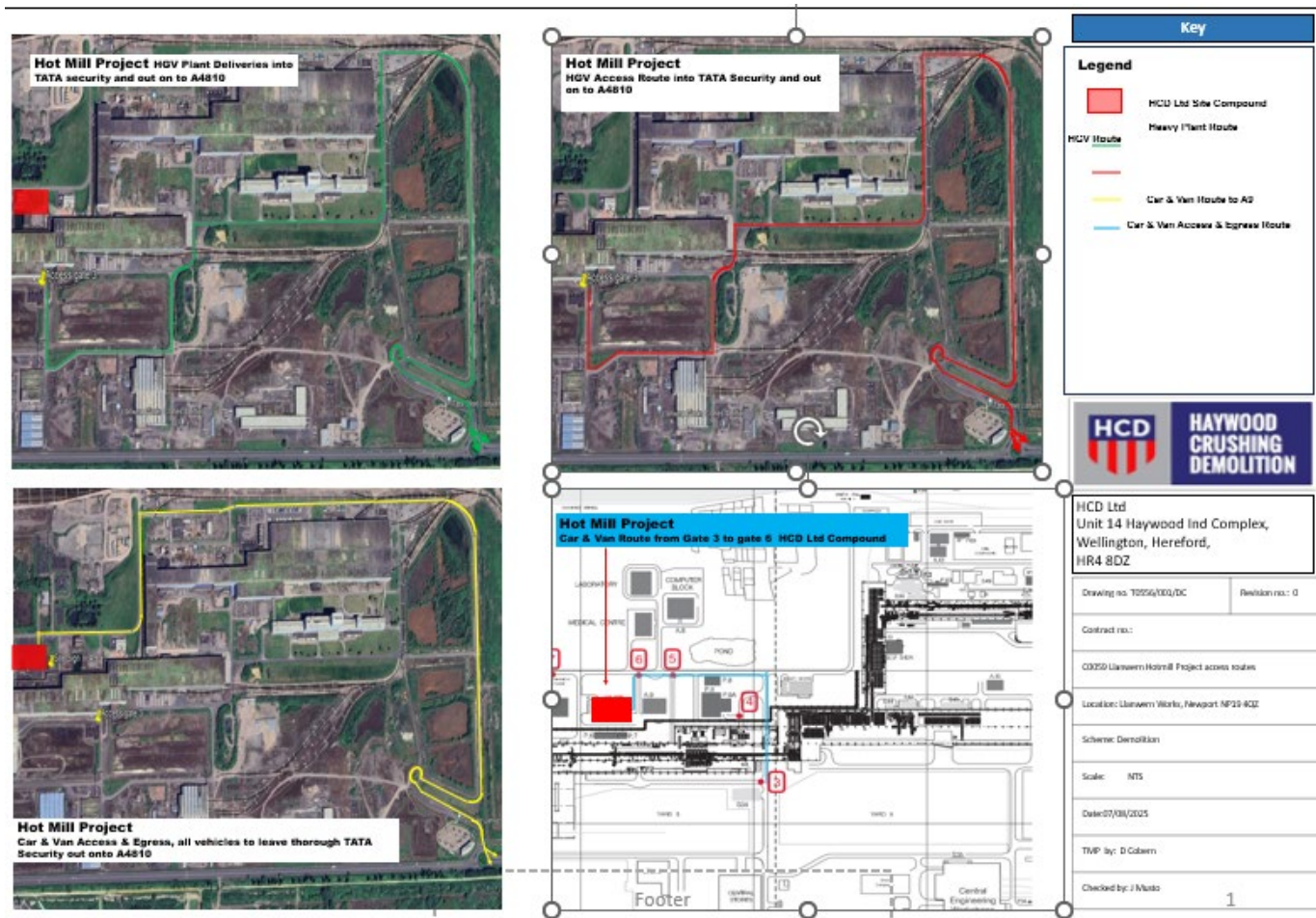
Appendix 4

CDM Project Layout Plan

As displayed in the site compounds notice boards.



Appendix 5 Traffic Management Plan



Routes to and from the site, via TATA steel security gate house.

Appendix 6 Organisations and arrangements

LEADERSHIP

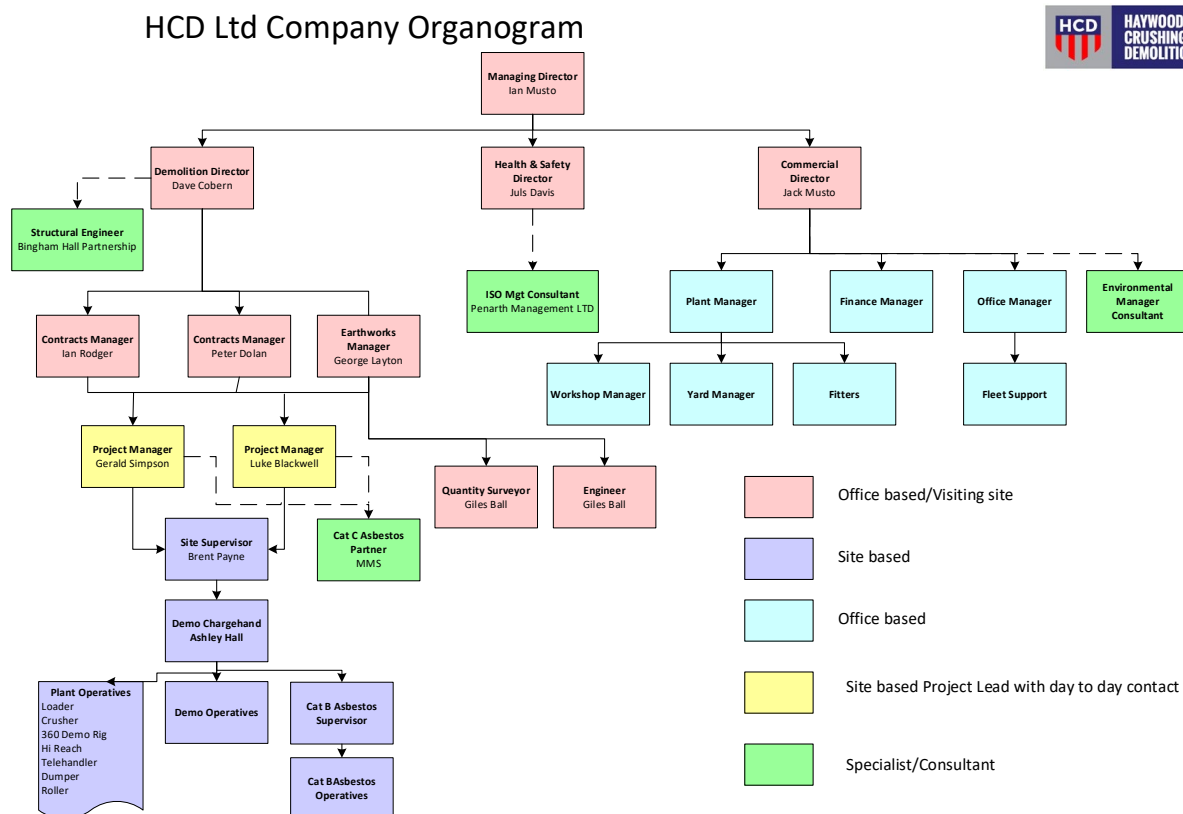
Leadership and Commitment

The Directors and “Top Management Team” of HCD Ltd are committed to the development and implementation of a Quality, Environmental and O H & S Policy and a Management System which are both compatible with the works carried out and the services supplied by the company. This system is frequently reviewed to ensure that it conforms to the relevant standards, legislative requirements, and regulatory requirements of the company and also to ensure that it reflects on the companies work activities. Responsibility has been assigned to ensure that the Quality Environmental and OH&S Management System conforms to the requirements of ISO9001:2015 and ISO14001:2015 and ISO45001:2018 and the provision to report on performance to the “Top Management Team” has been defined.

The Directors and Managers of HCD Ltd are responsible for implementing the Quality, Environmental and OH&S Management System and for ensuring that the system is understood and complied with throughout all levels of the company.

Organisational Structure

Top management have defined the organisation and roles, responsibilities and authorities of its employees. All employees have been informed of the responsibilities relating to their role.



HEALTH AND SAFETY POLICY STATEMENT

INTRODUCTION

This statement sets out the policy of HCD Limited (The Company) in respect of any employee, self-employed person and contractor under our control whose health and safety may be affected by our work activities. Its intention is to assist in protecting all our personnel whilst at work and to assist the Company in fulfilling its legal and moral obligations and to continually improve its performance with regards to health and safety.

In addition to the groups of persons mentioned the first paragraph above, the Policy is also intended to assist in ensuring that clients and other persons who may come into contact with this Company, its premises or its activities (whether or not work-related) are not adversely affected with regard to their health and safety.

Provided that persons referred to in the first paragraph above adhere to the provisions and precautions contained within this policy, they will be able to work safely and without undue risk to their health. They will also be considered to have demonstrated compliance with their conditions of employment or contract in so far as they refer to health and safety at work.

Persons referred to in the first paragraph above are to be made aware of the contents of this Policy and become familiar with the conditions and precautions laid down. A copy of the Policy will be available at each place of work. Personal copies will be issued at induction with further copies of the Policy available upon request from Head Office.

DEFINITIONS

In this Policy, the expression 'at work' means whenever and wherever work takes place and may include travel for work (for instance travel between premises, sites, to and from meetings etc.).

The term 'legal obligations' refers to the statutory duties laid down principally in The Health and Safety at Work etc. Act 1974, but also in supporting legislation brought under the Act from time to time.

POLICY

The Company will take reasonable measures to ensure that those persons referred to in 5.6.1.1 are made aware of the contents of this Policy, the possible effects upon their personal health and safety and the possible consequences in the event of any breach of this policy.

The Company recognises its obligations under Section 2(1) of The Health and Safety at Work etc. Act 1974 and the various duties and obligations under The Management of Health and Safety at Work Regulations 1999 and associated legislation. It will also take all reasonable measures to prevent, so far as is reasonably practicable, any breach of duty placed upon the Company by legislation and/or this Policy.

Employees of the Company will exercise diligence in ensuring that this policy is adhered to. Responsibilities of individuals are determined by their grade of employment as detailed elsewhere in this Policy.

The Company will undertake, as far as is reasonably practicable, the following:

The provision and maintenance of plant, transport, equipment and systems of work that are safe and without risks to health.

Arrangements for ensuring safety and managing the risks to health in connection with the supply, use, handling, storage and transporting of articles and substances.

The maintenance of premises and places of work which are safe and without risks to health, and safe access to and from such places.

The provision and maintenance of a working environment for employees without risks to health and adequate as regards facilities and arrangements for their welfare at work.

The provision of such information, instruction, training and supervision as is necessary to ensure the health and safety at work of employees.

Adequate arrangements to ensure that employees or their representatives are given every facility for consulting with management in promoting and developing measures to ensure the health and safety at work of all employees.

Systems and procedures which will ensure that all operations and activities are executed at all times in such manner that persons not in our employment who may be affected by such operations are not exposed to risks to their health and safety.

POLICY REVIEW

This Policy will be reviewed after changes in legislation, changes in the structures of the Company, in the light of additional knowledge or information becoming available, and in any event annually.

RESPONSIBILITY FOR POLICY IMPLEMENTATION

Responsibility for the implementation of this policy is vested in the Board of Directors of HCD Ltd. They will be assisted as necessary by HCD Ltd.'s Safety Department who will provide support and advice on strategy and day to day health and safety related matters.

Signed:

A handwritten signature in black ink, appearing to be 'I. Misto'.

Name: Ian Misto

Date: 10/01/2025

Signed on behalf of HCD Ltd.

These Policies represent the framework for planning and improving the IMS, and setting general and specific quality objectives. The Integrated Management System is appropriate to HCD Ltd.'s processes, products, and services, and is derived from the overall policies, context, and strategy, and provides a framework for establishing and reviewing objectives. The Integrated Management System is approved by the Managing Director. Whenever required, Managing Director reviews the policy for its continuing suitability. The IMS also includes a commitment to satisfy applicable requirements and continual improvement of the IMS. Our quality, environmental, and Health & Safety policies are:

HCD LTD. is committed to:

The satisfaction of our customers in all respects by supplying high-quality products, complying to the relevant standards, always on time

Fulfil our commitment through total involvement of all at HCD LTD. and with continual improvement in our integrated management system.

Identify, prevent, control and minimize adverse environmental impacts associated with our operational activities

.Comply with all quality, environmental, Health & Safety requirements.

Develop and maintain a highly motivated and trained workforce for effective management of the quality, environment, and Health & Safety issues.

Communicate our environmental commitment to clients, employees and other interested parties.

Strive to continually improve our quality, environmental and Health & Safety performance keeping in view the regulatory requirements, Health & Safety requirements, environmental requirements, community concerns, and technological advancements. Establish & maintain a healthy work environment.

Comply with applicable legal requirements.

Adopt the best practice of operations to prevent ill health & injuries

Ensuring only licensed Asbestos Contractors will undertake NLW work for HCD and only trained and competent HCD operatives will undertake NNLW.

Protect the health and safety of non-English speaking personnel employed by the company and others who may be affected, including staff, visitors and members of the public.

Organizational roles, responsibilities, and authorities

Clause no.5.3 of ISO 9001:2015

Clause no. 5.3 of ISO 14001:2015

Clause no. 5.3 of ISO 45001:2018

Responsibilities and authorities for relevant roles are assigned by top management and communicated within **HCD LTD.** Top management assigns roles and responsibilities for ensuring that the IMS conforms to ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 and reporting on the performance of the IMS, including the IMS performance, to top management, the following responsibility and authority to:

ARRANGEMENTS

The responsibilities for different management grades and individuals are detailed below:

Responsibilities of the Board for HCD

The Board is ultimately responsible for the development and implementation of policies and procedures, which will assist in securing the health and safety of employees and others who may be affected by the operations and conduct of HCD.

Each member of the board will accept their individual responsibility as well as their collective responsibility as the board and provide health and safety leadership to that effect.

The Board will ensure that a positive attitude to health and safety management is presented at all times to staff, clients, other organisations and members of the public and that priority is given to the promotion of a positive health and safety culture within the organisation. This will be achieved by the following:

Placing health and safety on the agenda at meetings of the Board and minuting the content of those discussions.

Ensuring that policies and associated documentation relating to health and safety at work is reviewed on a regular basis and that changes are made as appropriate.

Liaising regularly with the Health and Safety Director and various other management grades on matters relating to health and safety at work.

Keeping informed of new developments in health and safety management techniques. Keeping informed of relevant changes in health and safety legislation.

Ensuring that adequate resources are allocated to health and safety.

Ensuring only licensed Asbestos Contractors will undertake NLW work for HCD and only trained and competent HCD operatives will undertake NNLW.

Formulating plans and strategies designed to promote awareness of health and safety matters.

Providing support and assistance to employees in matters relating to health and safety at work.

Ensuring that accidents, dangerous occurrences and other events which may adversely affect the health and safety of those who work under the control of HCD are properly reported, recorded and investigated. Engage the active participation of the workers in improving health and safety.

In order to assist in fulfilling its duties and responsibilities, the Board will be assisted by all management grades within the Organisation and in particular the Health and Safety Director.

Each member of the Board will also have individual responsibilities detailed below in *Responsibilities of Individuals*.

Responsibilities of the Health and Safety Department

he Health and Safety Director

The Health and Safety Director is responsible to and reports to The Board on all significant health and safety failures, and the outcome of the investigations into their causes and all other matters relating to health and safety at work.

The Health and Safety Director will provide support to the Board so as to assist them in meeting their responsibilities as defined above.

The Health and Safety Director will ensure the Board periodically review health and safety performance and make representations and recommendations to the Board so as to assist in the formulation of plans and strategies designed to promote awareness of health and safety matters.

The Health and Safety Director will ensure the health and safety policy statement reflects current board priorities.

The Health and Safety Director will ensure that HCD management systems provide for effective monitoring and reporting of the organisation's health and safety performance.

The Health and Safety Director will act as the initial and primary point of contact between the Board and other management grades.

In addition to the above mentioned responsibilities relating to the interface between the Board and other management grades, the Health and Safety Director is also responsible for ensuring:

The preparation, review, distribution and implementation of the organisations health and safety policies and procedures.

General compliance with all health and safety legislation, approved codes of practice, safe systems of work and official guidance.

That support is provided to the Health and Safety Management and that sufficient time and other resources are afforded so as to enable effective discharge HCD's duties.

That all employees receive such information, instruction, training and supervision as is necessary to enable them to work safely.

That regular opportunities are provided for all employees to discuss health and safety issues, to voice concerns over working practices or conditions and to make suggestions for improvements. These opportunities may include those for personal representations or those provided through recognised groups or committees.

The Health and Safety Director will carry out health and safety duties and is responsible to and reports to the Managing Director on all matters relating to health and safety at work.

The Health and Safety Director will carry out his/her duties with the aim of safeguarding the health and safety of persons employed by the Company and Inspecting and auditing workplaces and procedures and, where appropriate, making recommendations for health and safety improvements.

Carrying out generic assessments for activities and work processes, which are undertaken throughout the Organisation, where appropriate, assisting Managers and supervisors and others in the preparation of activity specific assessments required by health and safety legislation.

The arrangement and/or provision of training for members of staff in health and safety matters.

The investigation of accidents, incidents and dangerous occurrences and the making of recommendations intended to prevent a recurrence of the event.

The provision of advice and information regarding compliance with health and safety legislation.

The control of contractors working on our premises.

The day-to-day maintenance of the Organisation's health and safety policies, procedures and records.

Regular contact and liaison with outside bodies concerned with health and safety matters.

The promotion of a positive health and safety culture throughout the Organisation.

Keeping informed of new developments in health and safety management techniques.

Keeping informed of relevant changes in health and safety legislation others who may be affected by HCD's undertakings. This will be achieved by the following:

The Health and Safety Director will also have the individual responsibilities detailed below in *Responsibilities of Individuals*.

Responsibilities of Managers & Supervisory Personnel

Managers and supervisors are responsible to and report to the Health and Safety Director on all matters relating to health and safety at work and will be assisted in their health and safety duties by HCD's Health and Safety Department.

Managers and supervisors are further responsible for ensuring:

That all persons under their control conduct their undertakings in accordance with relevant health and safety law, approved codes of practice, established safe systems of work and the organisation's health and safety policies and procedures.

That statutory notices are displayed at all places of work.

Only competent people operate HCD plant and equipment.

Only licensed Asbestos Contractors will undertake NLW work for HCD and only trained and competent HCD operatives will undertake NNLW.

That HM Inspectors and representatives of other official enforcement, inspection and regulatory services are, during their visits, accompanied by a member of staff with sufficient knowledge and responsibility to assist them with their enquiries.

That all necessary procedures, such as risk, manual handling and COSHH assessments etc. are carried out for work activities, communicated to the workers and, where appropriate, records are kept.

That adequate first aid provision is made at each place of work and that all accidents are recorded on an Injury Report Form.

That sufficient information, instruction and supervision is provided to persons under their control.

That adequate and appropriate personal protective equipment is made available and used as necessary.

That work is planned and carried out only after health and safety matters have been taken into consideration.

Managers and supervisors will also have the individual responsibilities detailed below in *Responsibilities of Individuals*

Plant and Transport Manager

The Plant and Transport Manager will carry out health and safety duties pertinent to the role and is responsible to and reports to the Health and Safety Director on all matters relating to health and safety at work.

The Plant and Transport Manager will at all times carry out his duties with the aim of safeguarding the health and safety of all persons employed by the Company and others who may be affected by their undertakings. This will be achieved by the following:

Plant

Ensuring all relevant plant has current valid 12 month thorough Inspection certificates, copies of which are to go to site with the machine.

Ensuring all Plant arrives on site in a satisfactory condition.

Managing the Plant Defect Reporting System and ensuring necessary repairs are prioritised and completed in a competent and timely fashion.

Ensuring Plant is properly maintained and maintenance logs are kept up to date.

Ensuring appropriate PPE is made available for operatives working within Plant, Transport or Yard Departments.

Ensuring Daily check sheets are available

Transport

Ensuring the HCD Daily Defect Reporting system is followed by all relevant personnel and any defects identified are prioritised and completed in a competent and timely fashion.

All monthly inspections are carried out and kept up to date.

All drivers are competent and licensed and remain so.

The Plant and Transport Manager is also responsible for the yard, including workshops and stores, and any safety issues that arise therein.

The Plant and Transport Manager will also have the individual responsibilities detailed below in *Responsibilities of Individuals*.

Responsibilities of Individuals

All grades of employee have an overall responsibility, defined in section 7 of The Health and Safety at Work etc. Act 1974, to ensure that they take reasonable care of their own health and safety whilst at work and also that they do not adversely affect others by anything they do (or fail to do) whilst at work.

Section 8 of the same Act places a duty on all employees not to interfere with or misuse anything that is provided for reasons of health and safety.

All individuals are required to co-operate with the Company and his or her fellow employees on all matters relating to health and safety at work.

All persons are required to report, in the first instance, to their supervisor, manager or director, any condition, which is or may be detrimental to the health and safety of any person. This may include the physical condition of premises or equipment, a dangerous or unsafe work practice or the regard paid to health and safety matters by others. If this mechanism fails to address the shortfall then report it to the Safety Department.

No person may undertake any form of work for which they have not been specifically trained and/or authorised. The decision regarding the competence of any person with regard to health and safety matters will be taken by the appropriate Manager, after discussion where necessary with the Health and Safety Director.

Estimators and quantity surveyors

Persons engaged in estimating activities, must ensure that tenders and estimates take account of safe methods of construction, systems of work, etc. and that proper provision is made for welfare facilities.

Persons engaged in the procurement of sub-contractors must ensure that all sub-contractors employed by HCD Ltd. are 'approved' following satisfactory completion of HCD Ltd.'s Contractor Assessment Questionnaire.

The estimators and quantity surveyors will also have the individual responsibilities detailed below in *Responsibilities of Individuals*.

Health and safety consultation with employees

HCD Ltd. will endeavour to consult as many of the workforce as possible on a monthly basis through the Team Briefings and Safety Stand downs and toolbox talks.

Employees should raise all issues regarding health and safety, in the first instance, with their immediate line management. If they are not satisfied with the response then they can either go further up the line management structure or alternatively inform the Safety Department.

HCD Ltd. operate a suggestion scheme and encourage all employees to make use of it. If the suggestion is regarding Health and Safety it should be raised with the immediate line management at the earliest opportunity as well as submitting the suggestion to the Suggestion Scheme, as the issue may pose an immediate risk to people's safety and the Suggestion scheme has an extended turn around time.

Organization Structure

The Company recognizes that the structure of the organization needs to constantly evolve in order to meet the changing needs of clients, the market and compliance obligations.

The Management Team is responsible for ensuring the structure of the organization is appropriate to the current business needs and will ensure that the organization chart is regularly reviewed and maintained.

Appendix 7 Method Statements, Risk Assessments