

Demolition Environmental Management Plan (DEMP)

MANAGING THE ENVIRONMENT FOR DEMOLITION and ASSOCIATED WORKS at TATA Llanwern Llanwern House Newport

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Prepared by:	Print Name: Dave Cobern	Signed: - <i>D Cobern</i>	Date: 21.08.25
Reviewed by:	Print Name: Jack Musto	Signed:- <i>J Musto</i>	Date: 21.08.25

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1. Purpose

This Demolition Environmental Management Plan (DEMP) sets out how HCD Ltd will manage the safety, health and environmental aspects of the planned demolition of the Llanwern Hot Mill and associated equipment and infrastructure [*hereafter called the Project*]. It will summarise the proposed pollution prevention measures for land, air and water and identify all environmental controls to be used throughout the project. It will be maintained and used for:

- Providing project staff with instruction and guidance on the project specific arrangements and for managing and monitoring safety, health and pollution related activities;
- Ensure safe demolition of the former site whilst maintaining surrounding thoroughfares
- Issue to the Client, designers, subcontractors and third parties for their information and use;
- The basis for the Project specific induction training.
- Operatives have been trained, SEAT (Site Environmental Awareness Training) and TBT will be given as and when necessary.
- Demonstrating and monitoring compliance with legal and contractual requirements;
- To comply with the requirements of Construction [Design and Management] Regulations 2015 Approved Code of Practice and Guidance and with the requirements of BS EN ISO 14001:2015 Environmental Management Systems
- To comply with the requirements of OHSAS 45001 Occupational Health and Safety System;
- Prevent adverse environmental impacts;
- Ensure mitigation measures are implemented for non-preventable environmental impacts and reinstate / restore, as far as is practicable, the environment to its pre-project state where required;
- Minimise disruption to other operations around the perimeter and the surrounding industrial/office units,
- Ensure that best practice is followed in accordance with the guidelines / targets contained within the Considerate Constructor Scheme.
- Keep lorry movements to a minimum, ensuring contractor vehicles do not park in the local area or obstruct others and keep all roads to and on the individual work sites clean and clear,
- Define hours of working; 07:00am-19:00pm (Mon-Fri); 07:00am-18:00pm Sat 08:00 16:00 Sun
- Reduce dust, noise and vibration by adopting best practice;
- Ensure there is a dedicated point of contact for the demolition site and that the community, including neighbours, are kept informed throughout the demolition process.

The Construction Phase Health and Safety Plan (CPP) will be kept on site available for inspection at the request of any authorised officer. It will be reviewed and updated as necessary throughout the duration of the works.

2. Preparation and Development

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

- Developed to comply with the requirements of the Contract;
- Reviewed, authorised and issued for use;
- Submitted to the Client for review and acceptance before starting work on the Project;

- Issued and made available to project staff so that they are aware of its content and requirements;
- Reviewed regularly during the monthly 'Project Progress and Performance Review Meetings' 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.

3. Management Responsibilities

The Management Responsibilities of key staff are defined at site level. Detailed individual roles and responsibilities can be found Appendix D. Each member of staff involved in the Project is responsible for:

- Reading and understanding the requirements and integrating these requirements into their regular working methods
- Ensuring that employees under their control are familiar with relevant procedures and instructions and have ready access to them;
- Providing clear and unambiguous instructions to employees under their control;
- Ensuring that work under their control is planned, controlled and completed in accordance with Company, Contract and Statutory requirements;
- Verifying the standard of work carried out under their control by supervision, surveillance and inspection;
- Recording all instances of failure in the System, incidents and near misses with the agreed corrective action to remedy the immediate problem and minimise the probability of recurrence;
- Controlling documents received and prepared.

4. Existing Conditions and Environmental Surveys

HCD Ltd recognise the potential for its operations to interact with the environment and is committed to managing any potential impacts responsibly through the implementation of effective environmental practices and controls. The following surveys detailed in section 5 have been completed and will be held in the site file.

5. Ecology, Habitat, Nuisance and / or Protected Species

The habitats within the site provide few opportunities for faunal species, being dominated by existing industrial development. The accompanying Preliminary Ecological Appraisal (PEA), prepared by RSK biocensus confirms that no statutory or non-statutory designations are located within the site.

HCD Ltd By identifying their locations, understanding potential pathways for impact, and implementing all necessary mitigation measures, we are confident that no significant adverse effects will occur

RSK Biocensus has been commissioned by TATA to carry out all necessary ecological surveys and prepare the corresponding reports. These include:

- A preliminary bat roost assessment (PRA) survey of buildings inside and outside the CDM boundary in March 2024;

- Bat hibernation surveys of the Hot Mill building December 2024 to February 2025;
- Breeding bird surveys, with a specific focus on birds nesting on the Hot Mill and adjacent buildings, between April and June 2025;

Further PRA, bat dusk emergence, dawn re-entry and static detector monitoring surveys of the Hot Mill and adjacent buildings between May and August 2025;

- A preliminary ecological appraisal (PEA) survey in July 2025; and,
- A (shadow) Habitat Regulations Assessment (HRA) Stage 1: Screening assessment report, produced August 2025.

Extracts have been taken from these reports and are detailed below. The full reports will be available in the site office.

TATA has commissioned RSK Biosenses to carry out a HRA. A summary of the report is included below.

Llanwern– HRA dated August 2025 Ref: 2486598-D04 (00)

Executive Summary

RSK biocensus was commissioned by Tata Steel UK Ltd to prepare a Habitats Regulations Assessment (HRA) Screening Report (Stage 1) in relation to the proposed demolition of the Hot Mill building and surrounding buildings/structures at Tata Steelworks in Llanwern, near Newport in South Wales.

This report considers whether the project will result in significant effects on four internationally important designated sites located within 10 km of the Site, which are designated for their nature conservation interests. These are:

- *Severn Estuary Special Areas of Conservation*
- *Severn Estuary Special Protection Area*
- *Severn Estuary Ramsar Site*
- *River Usk Special Areas of Conservation*

Having carried out a HRA Screening assessment, it is concluded that the proposed demolition activities are not likely to have a significant effect on any of the internationally important designated sites listed above, either alone or in combination with any other plans or projects.

The conclusions for the report titled “**Llanwern Former Steel Hotmill demolition – nesting bird briefing note REV02**” 19th April 2024 ref 2486598 is stated below.

Overall, it is considered that confirming the location of the peregrine nest and subsequently phasing the demolition based on this is likely to be the best mitigation option, as the demolition could work around the peregrines, allowing final demolition of the know nesting location to be done outside of their nesting period.

Other than the increase in human disturbance from the demolition process, netting would appear to be the best method of deterring peregrines and other birds from nesting on the Hotmill building though it may be costly to cover the entire building. Additionally, safety issues may make it impractical to completely cover the building or roof. Alternatively, it may be more feasible to

selectively net specific areas where peregrines are likely to nest in advance of nesting period (determined in advance by an ecologist) and employ different deterrent methods for gulls and other species. But it should be noted that netting is not a 100% effective method and would need to be installed correctly and have regular checking and maintenance again to avoid birds becoming trapped.

The most suitable method for the building will depend on the species present and confirmed to be nesting either on or in the building. Breeding bird surveys should be undertaken by a suitably experienced ecologist during the 2024 breeding season to allow us to identify the species present and their exact nesting locations, and determine the most effective deterrent method/s.

Works may be able to continue in the current operational area, provided they do not cause additional disturbance to peregrines and cause them to abandon their nest. Monitoring by a suitably experienced ECoW will allow us to monitor their reaction to the works and advise on whether works need to be paused until the nest is no longer in use and young have fledged.

The recommendations of the Breeding Bird Report 24866598-DO2 (00) Dated August 2025 is detailed below.

Consideration needs to be given to timing and methods of certain works which may disturb nesting peregrine or impact other nesting birds during the nesting period. These works should ideally be carried out outside of the nesting season where possible. However due to the size of the building and duration of works, it is understood that avoidance by timing will not always be possible. Deterrents would therefore also need to be used to dissuade birds from nesting i.e. the use of scaring devices and physical preventative measures such as nets, wires, spikes. Although would also need to consider potential for disturbance to both peregrines and roosting bats with regard to type of deterrent used and location.

Several measures are available to deter and prevent birds from nesting in or on industrial buildings. These methods are listed below. An appropriate bird control specialist should be consulted on the best method(s) to use in this instance, to comply with legislation. Methods to deter or disturb birds to prevent them nesting need to be started prior to nesting season. Once nest building has started, all wild birds are protected by the relevant legislation and some of the below may not be appropriate.

The Conclusions for report 24866598-DO3 (00) Dated August 2025 are detailed below.

Llanwern: Northern Site Preliminary Bat Roost Assessment 2486598 April 2024

A Habitat Regulations Assessment is recommended to fully inform the potential impacts on internationally designated sites.

Roosting bats and breeding birds are using the buildings on Site. See the relevant reports for full survey details and recommendations.

For the buildings, ecological supervision will be required for certain dismantling works under the bat licence and monitoring of nesting birds is recommended.

Ecological supervision is also recommended for any vegetation clearance which may impact nesting birds or reptiles and as a precautionary measure during the drain down of the waterbodies.

Mitigation for bats and birds is dealt with in the respective reports. If looking to provide additional enhancements, bat and bird boxes could be installed in trees to the north, beside the railway and away from operational works.

The findings of the report titled Llanwern Bat Activity Survey Report Rev00 20250822 is provided below.

2486598 -D04 -Llanwern Bat Activity Survey Report Rev00 20250822

Project Proposals Survey Scope

The 2025 survey scope was informed by the 2024 PRA and proposed works. As described above, demolition works to the entire former Hot Mill building (consisting of sections 10A, 10B, 10C, 10D and 12 on Figure 2) will take between 2-3 years. Whilst other buildings within the Site are also due to be demolished, the majority of these will not be until 2027 or 2028. Given the timeframe for demolition, and the distances between the Hot Mill and other buildings (all at least 30m), surveys of all buildings in 2025 was not undertaken.

Of the 33 buildings within the Site and wider survey area and subject to PRA in 2025,

11 are considered to offer negligible potential to support bat roosts (buildings 3A, 3B, 4A, 5, 7A, 7B, 9E, 28A, 28B, 28C, 28D on Figure 2).

Seven of the buildings were covered by the dusk / dawn surveys completed (buildings

10A, 10B, 10C, 10D, 12, 13, 16 on Figure 2).

An additional five are over 200m north of the former Hot Mill and were included in the PRA to provide wider context to findings (buildings 17-21 on Figure 2).

B22 is 200m south of the Hot Mill and was also included in the PRA to provide context.

B16 was subject to PRA and dusk surveys as a potential mitigation option.

Buildings within the CDM boundary (Site boundary in Figure 1) which have bat roosting potential but were not subject to dusk/dawn surveys in 2025 are buildings 2, 4B, 6, 8, 9D and 11 (all identified as having 'low' potential to be used by roosting bats), buildings 1 and 9A (all identified as having 'moderate' potential to be used by roosting bats), and buildings 9b and 9C (confirmed bat roosts as part of PRA). It is noted that for some of these buildings their roosting potential has

increased since the 2024 PRA. In most cases this was due to asbestos investigation works in 2025, which lead to doors being left open and holes made in ceilings / external features. These buildings are all over 30m from the former Hot Mill (consisting of buildings 10A, 10B, 10C and 12 on Figure 2) and will not be subject to works until 2027 or 2028.

Additional surveys are proposed on these building in 2026 to provide relevant data to

determine whether they are used as bat roosts. Buildings 9B and 9C are to be subject to additional static detector monitoring to determine roost type. Both of these buildings are used by lesser horseshoe bats.

The scale of the Site (the former Hot Mill is a 11.6ha building) and historic use has

provided some challenges to the survey effort, including 800m long building

sides and hazards including asbestos and potential for pyrophoric materials to be present. Taking into account the overall site suitability and low likelihood for a roost of high conservation status, it is

considered highly unlikely that a significant roost has been missed, and therefore the surveys completed are sufficient to inform the impact assessment and future licence application.

2486598 -D03 - Hot Mill Llanwern PEA Report FINAL Rev00

A Habitat Regulations Assessment is recommended to fully inform the potential impacts on internationally designated sites (as noted above, this has now been completed). Roosting bats and breeding birds are using the buildings on Site. See the relevant reports for full survey details and recommendations.

For the buildings, ecological supervision will be required for certain dismantling works

under the bat licence and monitoring of nesting birds is recommended.

Ecological supervision is also recommended for any vegetation clearance which may

impact nesting birds or reptiles and as a precautionary measure during the drain down of the waterbodies.

Mitigation for bats and birds is dealt with in the respective reports.

6. Watercourses, Rivers and Groundwater

HCD Ltd is committed to ensuring that demolition activities near watercourses will not impact the water quality, quantity, or the bed and banks of these water bodies. All necessary measures will be implemented to prevent any pollution or disturbance, protecting both surface and groundwater throughout the project.

Works will be undertaken in accordance with the requirements of the existing Environmental Permit Site from Natural Resources Wales (ref: BS39051)

Noise, Dust and Vibration (see full details appendix C)

HCD commit to implementing noise, dust, and vibration control measures in full compliance with all relevant statutory requirements and industry best practice standards prior to the start of demolition. These include:

Baseline noise readings will be taken, Prior to any work commencing real time monitoring will be taken to ensure target levels are not breached as described below.

All vehicles and mechanical plant on the project will be fitted with effective exhaust silencers, will be maintained in good and efficient working order and operated in such a manner as to minimise noise and vibration emissions.

The best practicable means, as defined in Section 72 of the Control of Pollution Act 1974, amended 1988 will be employed at all times to reduce noise (including vibration) to a minimum, with reference to the general principles contained within the above named document

Generally, all works on the project will be undertaken in accordance with the Code of Practice for the Control of Pollution and Noise from Demolition and Demolition Sites and BS5228: 2009 'Noise and Vibration Control on Demolition and Open Sites'

This will encompass

- Waste and its management
- Ecology and preservation of wildlife and habitat's
- Noise, Vibration, Dust, Air Quality Pollution
- Incident Control

7. Noise Management

All plant listed on page 12 will meet the European tier 4f Stage V emission criteria – as all plant to be used on this site will not be older than 2018; manufacturers had to comply with European Legislation which prevented anything being constructed that did not comply with 4f Stage V from this date. All serial numbers and manufacturer's information will be held on site to demonstrate compliance.

8. Noise Control Measures (see full details appendix C)

To ensure environmental impacts are kept to a minimum the following control measures will be implemented for the duration of the project:

Llanwern works run 24/7. The Hot Mill has been mothballed for a number of years.

- All demolition works will use 'quiet' hydraulic powered demolition steel cutting shears/pulverising attachments where possible. The structures for demolition are steel framed across the whole site.
- Internally there is a mezzanine constructed from concrete and a number of concrete bases above ground level; pulverisers will be utilised on the mezzanine floors, impact hammers will be used (their use will be minimised) pulverisers will be the main attachment used wherever practicable.

- All lorries will be sheeted prior to leaving the site and will be loaded within the ring-fenced site boundary. Loading of materials will be done from the agreed designated loading areas.
- Each section of the project will be planned to ensure all noisy working is identified along with their respective timescales so such information can be communicated to all concerned parties.
- The use of fully serviced plant with fully operational exhaust systems
- Ensuring all plant engine covers are always kept closed
- All site plant not in use will be shut down and not left idling on site
- All provided site generator plant will be of the new 'whisper' operational type.
- Shouting out of instructions on site will be strictly forbidden, all site management and supervisors will be issued with site communication radios
- The playing of radios etc on site will be strictly forbidden at all times.
- The sounding of vehicle hooters, unless in an emergency, on site or in any adjacent street will be strictly forbidden at all times
- All commercial vehicles will be parked in the designated area onsite
- Where possible all site plant will be effectively silenced and located in such areas of the site so as to cause the minimum amount of noise migration to areas beyond the site boundary.
- Maximum noise generation levels will be determined for each major item of plant from such information as supplied by manufacturers or company noise monitoring records. This will enable the potential level of noise generation to be anticipated.
- There will be no site activities or plant engines started or lorry movements to and from the site made before 07:00 and not after 19:00
- All plant deliveries and collections plus all waste management requirements will be coordinated to ensure the noise impact from all such vehicle's movements on the community is kept to a minimum and is within agreed times.

It should be noted that the wider Llanwern steelworks run 24/7. The Hot Mill has been mothballed for a number of years.

To minimise noise output levels, sections of the buildings will be left in place up to 5 metres in height, to act as a sound barrier.

Plant to be used on site.

All plant to work from the west of the site working towards the cold mill (east) so that sound output is furthest from the boundary, and perimeter buildings act as a natural visual and noise barrier.

Noise limits current background levels

Source DATA Plant Specification Sheets

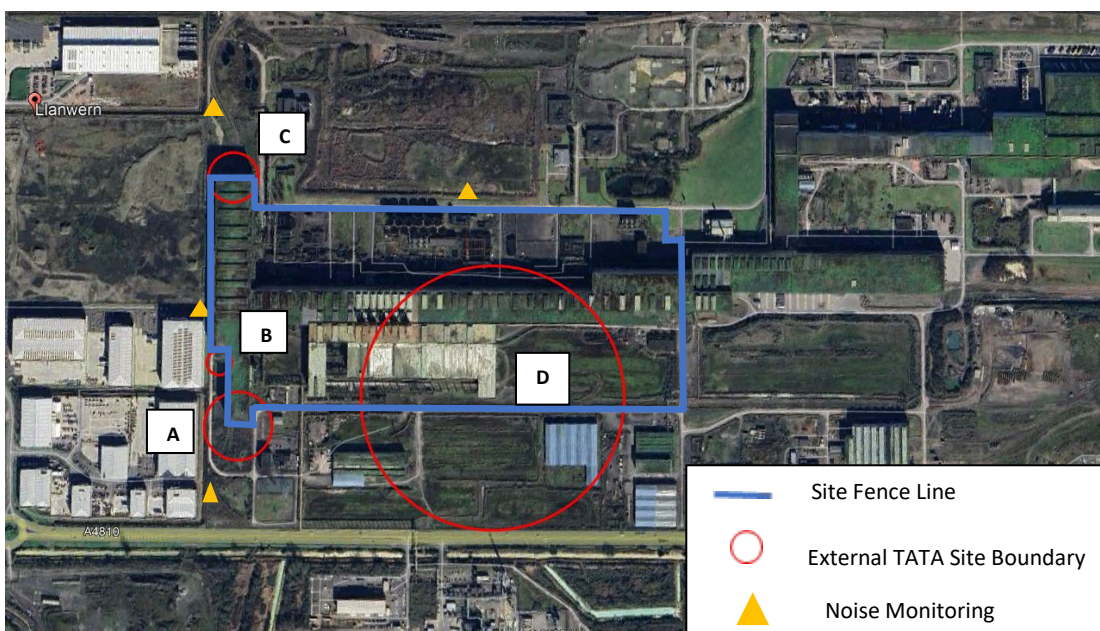
On time use of machines assumed to be 75% of the time.

Ground level

Plant DB'S			
Plant details	dB at source	Distance to Nearest receptor	dBs to TATA boundary
LIU GONG 924 F	Sound Power Level (ISO 6395) 99 dB(A)	50m	65.5dBs
LIU GONG 933 F	Sound Power Level (ISO 6395) 99 dB(A)	50m	65.5dBs
LIU GONG 939 E	Sound Power Level (ISO 6395) 105 dB(A)	85m	66.4dBs
LIU GONG 939 F	Sound Power Level (ISO 6395) 105 dB(A)	85m	66.4dBs
LIU GONG 952 E	Sound power level (ISO 6395) 108 dB(A)	85m	66.4dBs
LIU GONG 975 F	Sound power level (ISO 6395) 107dB(A)	Point A 61m	72.3dbs
LIU GONG 995 F	Sound power level (ISO 6395) 107dB(A)	Point A 24m	80.4dBs
VOLVO 380	Sound power level (ISO 6395) 105dB(A)	Point D 284m	58.9dBs
VOLVO 700	Sound power level (ISO 6395) 108dB(A)	45m	74.9dBs
HITACHI 870 (red)	Sound power level (ISO 6395) 109dB(A)	Point A 24m	80.4dBs
HITACHI 870 (orange)	Sound power level (ISO 6395) 109dB(A)	Point 45m	74.9dBs
DOOSAN 380	Sound power level (ISO 6395) 104 dB(A)	20m	64dBs
DOOSAN 420	Sound power level (ISO 6395) 104 dB(A)	20m	64dBs
KOMATSU 210	Sound power level (ISO 6395) 69dB(A)	200m	23dBs
DOOSAN 450 SHOVEL	Sound power level (ISO 6395) 111dB(A)	200m	65dBs
8-wheeler – lorries	Sound power level (92 Db level)	50m	58dBs2
Artic – lorries	Sound power level (99 Db level)	10m	79dBs3

$L_p(R2) = L_p(R1) - 20 * \log(R2/R1)$ calculation has been used to determine the level of noise at the TATA fence line boundary. See drawing below.

For the Plant to be used on site the estimated Db at TATA boundaries is shown in the table above. Noise monitoring will be placed in the locations detailed below to confirm the readings.



When necessary, for example prior to the start of the project, neighbours may be visited by TATA and informed verbally of the forthcoming activities.

Vibration Management

Such vibration level assessments will include:

- Falling demolition debris (vibration mitigated: - materials will be cut/pulverised into small segments
- Lorries being loaded with demolition wastes, vibration mitigated by carefully loading the vehicles, bins, within the centre of the site, away from the boundaries.
- Large plant will minimise vibration with the use of debris pads.

9. Vibration Control Measures

HCD Ltd will comply with BS 5228 [2009]: Code of Practice for Noise & Vibration Control on Demolition Sites & Open Sites [Part 1 & 2] to manage noise and vibration to avoid disturbance to local neighbours, businesses and wildlife, or structural damage to buildings and utilities.

The following activities are known to create high levels of noise and / or vibration, and will be used during the completion of the Project, therefore we will employ 'best practicable means of management and control for these activities:

- Operational Plant
- Vehicles

The activities listed will not necessarily occur continuously or simultaneously, but in stages, with peaks of activity NRW rated by periods of relative inactivity. The Project will work within 'core site hours' wherever practical.

The core site hours for the Project are:

- *Monday to Friday: 07:00 hrs to 19:00 hrs*
- *Saturday: 07:00 hrs to 18:00 hrs*
- *Sunday: 08:00 hrs to 16:00 hrs*
- *Bank Holidays: No works [except, where essential, by prior consultation with local authority & communication with local community].*

10. Liquids Management

To eliminate the risk of any potential ground, water course or drainage contamination from the various liquids which are used on site and from generated effluents the following control measures will be implemented on site

11. Liquids Control Measures

- All active drainage points within and adjacent to the site will be clearly identified and where necessary a means of water filtration installed around them.
- All diesel fuel for the site plant will be stored on site within bunded double skinned fuel bowers located at predetermined designated refuelling areas on site for easy access by plant but away from any drainage access point. The refuelling lines will be fitted with automatic shut off devices and unattended refuelling will not be allowed at any time. Lorries and other vehicles normally used on public roads will not be refuelled on site.

- The plant refuelling areas will be on a hard stand area and have a quantity of absorbent materials (spill kits) available in case of any diesel spillage, which will be cleaned up immediately.
- Other items requiring storage on site such as hydraulic oils etc. will be in the appropriate storage drums stored in a provided secure container or bunded area located at the appropriate position within the lower basement areas
- All site welfare facilities effluent and sewage discharge will be via connections to the internal drainage system.
- All wastewater from the site welfare facilities shall flow through fixed connections to the appropriate TATA internal sewage cess pits, then pumped into the TATA sewer system. At no time will any effluent be allowed to discharge directly onto the ground or into the water system.
- All wastewater from the on-site asbestos personnel de-contamination units will pass through installed proprietary wastewater filters before entering the existing drainage system;
- At no time will any dust control water sprays be allowed to generate a flow of run-off water. All such water spray operations will be controlled and managed by appointed site personnel in attendance at all times. Filters will be installed over drain outlets.
- HCD Ltd will comply with the TATA environmental permit for the water run off from the site and will ensure that they are maintained in an efficient state of repair and remain free from contamination.
- A specialist waste contractor will be employed to dispose of any hazardous liquid wastes found on site and disposed of in accordance with the respective regulations.
- Licenced Asbestos removal will be undertaken by HSE licenced Contractors and controlled by HCD Ltd.

12. Air Quality and Dust

Any emissions of nuisance dust and fine particulates emissions are to be adequately controlled and kept within acceptable limits.

Any potential impact on the local environment air quality relating to nuisance dusts and airborne particulates from the demolition works and operating plant will be continuously monitored for the duration of the project.

13. Air Quality Control Measures

To ensure the previously described impacts are minimised the following control measures will be implemented during the demolition project:

- Those demolition work areas generating dust will be damped down at source by an integral hose affixed to the attachment of the machine.
- This will be supplemented with a dust buster atomiser. This uses 1/10th of the water that traditional hoses use and create a fine mist.

14. Dust

Dust suppression in the form of a fine water spray is to be used during the demolition and loading activities, (if required). In addition, the below measures will be implemented.

15. Dust Monitoring Controls.

- Visual assessment of dust release - simply involving a representative to provide a visual survey and visual assessment of the dust released from the demolition activities.
- Monitoring of visible surface soiling – There will be areas around the demolition area or boundary of the site where it should be obvious to see if dust is being generated.
- Air Quality monitoring –background air quality surveys shall be undertaken as described below.

Monitoring Hardware to be used

NOISE MONITOR – SONITUS SYSTEMS

- IEC 61672 Class 1 measurement system;
- Automatic upload of data to the cloud;
- SMS and email alerts;
- Very compact requires 110v or 240v mains power;
- Battery or solar panel option Not included in proposal;
- Download data directly from the website for reporting – Sonitus Cloud.

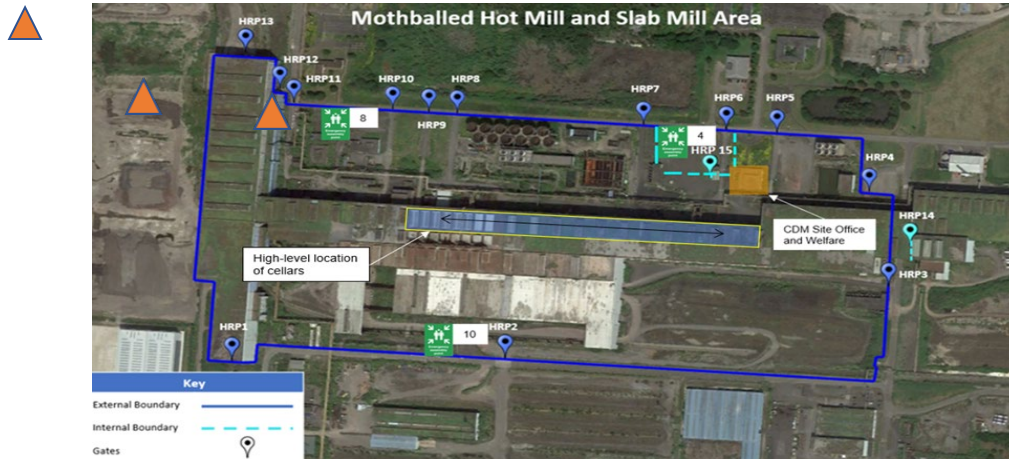


DUST MONITOR

- MCERTS certified PM10 dust monitor
- SMS and email alerts – can be triggered on 15 minute periods as required.
- 110v power
- Automatic upload of data to the cloud for reporting
- Optional ultrasonic weather station (picture next to Aeroqual cabinet)
- Download data directly from the cloud for reporting



Monitors positioned on the perimeter of the site closest to the demolition work are the most likely to be affected, these will be moved as work progresses down the site. The winds are south westerly prevailing.



- The demolition areas as well as surveys undertaken at all site boundaries. The results of the surveys are to be reviewed regularly, action taken where necessary and documented within the site files, a copy of which shall be filed within the site office.
- A dust boss machine will also be utilised during the high reach demolition works. The dust boss produces a liquid cloud which can be accurately directed toward the dust producing area, encapsulating the dust clouds.
- All demolition debris prior to being loaded will be damped down by the controlled use of fine water sprays.
- All demolition waste lorries will be sheeted over prior to leaving site.
- All site plant and waste collection lorries engines will be maintained in a fully serviced condition to ensure there are exhaust emission issues.
- The movement of all commercial vehicles particularly waste lorries to and from the site will be pre planned to prevent unnecessary vehicle movements.
- All contained refrigerant gases or other hazardous substances having the potential for an adverse impact will be removed by a specialist licensed sub-contractor for disposal in accordance with the hazardous waste regulations, at no time will venting to atmosphere of such materials be allowed.
- At no time will substances or chemicals be used on site which are likely to produce offensive odours.
- At no time will the burning of any demolition materials be allowed on site
- We will have a COSHH stores for the chemicals we propose to use

16. Waste

All waste management will be carried out in accordance with the company Environmental Management Policy ,and the Environmental Protection Act 1990 (EPA) Notably section 33 & 34 of the EPA. In addition a site waste management plan will be produced, regularly reviewed and updated. This will be audited internally.

Where any hazardous waste is to be handled for disposal this shall be carried out in accordance with developed risk assessments, and where a potential hazardous waste cannot be identified then a waste management company or consultants will be employed to determine what the substance is, the required control measures for handling it, the means of transportation and method of disposal.

All generated hazardous wastes will be disposed of in accordance with the Hazardous Waste Regulations 2005 (Amended) 2009 and in accordance with Section 34 of the Environmental

Protection Act Duty of Care with its required documentation procedures followed bearing the site Producer Code, which is issued by the NRW

As the site is expected to produce more than 500kg of hazardous waste, it will be registered with the Environment Agency and a Producer code obtained which will be recorded on all hazardous waste documentation.

All Hazardous Wastes will be placed into secure sealed waste skips and disposed of in accordance with the Hazardous Waste Regulations 2005 (amended) 2009 Duty of Care consignment note procedures, copies of which will be maintained within the project files for future reference.

All non-Hazardous wastes will be placed into open waste skips, which will be sheeted over prior to being transported off site. Transfer notes will be issued for each consignment.

The company will implement a recycling and reclaim programme in accordance with its Environmental Management Policy and the ICE Demolition Industry Protocol where a pre-demolition site audit will be undertaken to identify and record all the estimated categories and volumes of materials that potentially can be recycled from the project. Then at the end of the project the actual achieved categories and volumes of materials will be entered, and the demolition recovery Index Efficiency can be calculated for the project. To ensure the management of all generated wastes is achieved our proforma Site Waste Management Plan will be completed and issued to the client. Then as Principal Contractor at HCD Ltd will undertake the daily management of the information to be inserted into the plan. This at the end of the project will be copied to the Client. The plan will be managed by a site management representative

HCD intend to recycle 98% of waste.

In addition to the recycling of generated demolition materials, additional recycling will be undertaken of the following materials generated from the management of the project: -

- Recycling of all packaging and containers
- Collecting all wastepaper, aluminium drink cans, glass bottles and plastic containers and placing them into their respective containers for recycling;
- Recycling of all ferrous and non ferrous materials
- Recycling of other waste to transfer stations
- Waste electronic and electrical equipment.

17. Hazardous Wastes Management

All identified hazardous wastes will be removed and placed into separate secure and sealed waste bins which will be located within their own area within the lower ground levels. Categories of hazardous waste will consist of:

- Asbestos containing materials
- Fluorescent light tubes
- Plaster board with a sulphate content of more than 10%
- Waste oils, grease etc

A maximum of 50 cubic metres of hazardous waste shall be stored on site at any one time.

Any clinical waste or drug related debris will be collected in accordance with laid down company methods and placed into approved containers for transportation to an incinerator point.

18. Hazardous Waste Producer Code

The site will be registered with the NRW and a Waste Producer Code will be obtained.

This code will be required to be placed on all Hazardous waste documentation.

Non-Hazardous Wastes Management

All non-Hazardous wastes will be removed and placed into open waste bins which will be located within their own designated area.

Such non-hazardous wastes will consist of:

- All soft strip materials
- Fixtures and fittings
- Ferrous and non-ferrous materials
- All generated reinforced concrete waste
- Office furniture and carpeting

All generated demolition wastes will be sorted for reuse or recycling or disposal and placed into their respective storage bins by mechanical excavators. Once full, covered waste Lorries from the registered waste hauliers will transport the wastes to a contracted recycling centre or nominated landfill site.

19. Waste Hauliers

The following licensed waste removal contractors will be employed for the removal and disposal of the identified category of wastes:

Non-Hazardous Wastes
HCD Ltd
Unit 14 Haywood Business Complex
Wellington
Hereford
HR4 8DZ

All other types of waste will be removed from site by a designated registered licenced removal company, when known.

20. Waste Management Documentation

All Hazardous wastes will be disposed of in accordance with the Hazardous Waste Regulations and Duty of Care Consignment Note requirements. Waste will be removed by a licensed hazardous waste removal company for disposal at the appropriate licensed hazardous disposal site.

All non-hazardous wastes will be placed into open waste skips and disposed off site at a designated licensed disposal site. Company waste transfer notes will be issued for each consignment.

The management of all such documentation will be undertaken by the appointed Site Transport Co-ordinator.

21. Records – Site Waste Management Plans

In line with the Site Waste Management Plans Regulations 2008 (6th April 2008), HCD Ltd will develop and implement a Site Waste Management Plan (SWMP). The SWMP will be actively

managed throughout the demolition works, with all relevant information recorded and updated on a daily basis.

The following headings confirm-what should be recorded in a site management plan as a guide. More information will be in the Site Waste Management Plan prepared by the client.

- The category and weight of each Hazardous waste removed from site and its disposal destination
- The category and weight of each non-Hazardous waste removed from site and its destination whether it is for recycling or landfill disposal
- The number of waste lorries which have visited site
- The categories and amounts of site consumables delivered to site such as oils, welfare and PPE

Reports detailing material tonnages being removed against energy usage can be produced from these records which will assist the company in developing a strategy for reducing its carbon footprint.

22. Company Energy and Waste Minimisation

Although the company prioritises reuse and recycling within this Demolition Environmental Management Plan, it is also committed to minimising energy consumption and waste generation.

23. Minimisation of Packaging

Achieved by:

- Purchasing in bulk, thus, lessening the need for delivery vehicle movements which gives many benefits
- Encouraging suppliers to deliver bulk orders on pallets, seal wrapped and not put into individual boxes.
- Having orders delivered in returnable containers
- Where the above is not achievable, ensuring all such packaging as cardboard, paper, pallets etc are recovered for returning or recycling by being placed into the appropriate skips on site

24. Site Waste water

Minimisation of Energy and Water Consumption

The following procedures are included within this Demolition Environmental Management Plan and will be adhered to throughout the entire Project:

- All processes and procedures to be examined to determine where and how energy is being consumed.
- Setting objectives and targets to reduce energy consumption and waste produced.
- Detailed assessments of the waste being produced and assess how that level can be reduced by continuous improvement in the setting of objectives and targets
- Keeping detailed records of any raw energy being consumed
- To train all site staff to be environmentally aware.
- Use of low energy light bulbs

25. Road Cleaning and Wheel Washing

Vehicle wheel washing facilities will be installed (if required) at all exits from the loading area. Wheels will be washed down with hoses and lorries wheels will remain on hard standings at all times.

The project will be undertaken in accordance with HCD Ltd's environmental management system which complies with ISO14001.

Any fuel or chemical storage will be undertaken within bunded enclosures. Spill kits will be placed adjacent the works in the event of spill through broken pipes or during re-fuelling.

To minimise the risk of ground contamination on site, the following control measures outlined below will be implemented which will be actioned by designated site personnel using liquid absorbent materials such as granules and fine sand, which will be stored at a convenient designated location on site. All such wastes from clearing a spillage incident will be placed into the appropriate waste container such as an oil drum which will then be disposed as Hazardous Waste.

To ensure ground contamination is kept at a minimum the following standards will be actioned:

- All diesel storage and refuelling areas will be on a hard stand and have their own spill kits and fire points
- Any liquid escape or spillage such as an oil leak will be cleaned up immediately by the designated site personnel acting as a site spillage team
- All standing small plant will have drip trays placed underneath them

To ensure that ground contamination is kept at a minimum, a plant service and repair area will be designated on an easily accessible section of hard standing large enough to accept all sizes of site plant and visiting maintenance vehicles.

In the event of a significant environmental pollution occurrence, the client Perses CDM and the NRW will be advised immediately.

26. Asbestos

A full Refurbishment and Demolition Survey has been undertaken, and notifiable asbestos has been identified. It will be removed under controlled conditions by a licenced asbestos contractor. All works will be notified to the Health & Safety Executive (HSE).

All areas which contain notifiable asbestos will be placed under negative pressure within fully sheeted enclosures. Asbestos will be removed by competent Asbestos operatives wearing full PPE and RPE. All waste will be double bagged and loaded into covered skips for removal to a licenced landfill. When areas are complete, successful air clearance certificates will enable re-occupation certificates to be issued and previously contaminated areas to be accessed by site operatives and visiting personnel.

27. Rodent Infestation and Pest Controls

To avoid impacts from pests and rodents, the following control measures will be implemented on site in the following order:

- All drainage systems and access points will be kept secure to prevent rodent access.
- All generated rubbish particularly food waste will be cleared as it is generated and placed into secure containers and removed off site for disposal on a continuous basis.
- A high level of good housekeeping will be maintained on site and in all facilities

- Site rules will be implemented to prevent the feeding of such pests as pigeons and seagulls.
- All food stuffs brought on site will be within storage containers. Where all other control measures have been actioned then pest control management will be implemented on site.

28. Planning Conditions and Requirements

HCD Ltd recognise that to carry out certain operations legally, e.g. planning conditions and their requirements, Planning has not yet been agreed, once planning has been agreed this document will be updated on a regular basis, any planning conditions completed as required. .

29. Liaison

The demolition works will be undertaken in close proximity to operating vehicles on surrounding roads and also to the surrounding TATA facilities. The proposal outlined below will be undertaken to ensure that the local community is aware of project activities and progress, and the methods of providing feedback and/or complaints.

HCD and TATA project team will ensure the shared users and the surrounding community are kept informed of the progress of demolition activities. This will include proposals for maintaining contact with the TATA community to discuss the progress of the works, each stage of activities and to hear the concerns of neighbours, including as appropriate

- Group and individual briefings/meetings
- Emails

During demolition, Contact Boards will be displayed prominently to ensure that TATA employees and others can channel their questions and complaints to a member of staff who has the authority to take action and that problems can be rectified quickly.

The Contact Boards will include the following:

- Name of the main contractor, address and person to whom correspondence should be addressed.
- Name of the Project manager.
- Names and telephone numbers of staff who can take immediate action, so that contact can be made at any time, including out of hours.

There will be no deliveries collections or operation of site plant before 07:00 or after 19:00, unless a delivery of plant which has to be escorted by the Police.

The company will ensure a level of courtesy is maintained by all site personnel at all times to all TATA employees, and site visitors.

This will also relate to any member of the ethnic communities as any form of racial discrimination, verbal abuse, or incitement will be viewed as a serious breach of this company's policies.

The company will ensure that at no time will any site personnel will be allowed in any public area wearing tee shirts with offensive slogans on them.

The company will ensure that no site personnel will be allowed to leave site and in particular travel on public transport wearing site clothing. All site clothing shall be changed to domestic clothing prior to leaving site.

All persons working on site will be advised that the highest priority relating to environmental impacts will be to maintain the quality of life to the highest level for all site neighbours and local community at all times.

Any site person receiving a concern or complaint from adjacent properties or passing pedestrians shall refer the matter immediately to the project manager; who will record the fact and refer the matter to the management team who will then carry out an investigation. The site project manager will oversee all compliant investigation and the end results shall be recorded in the site diary.

30. Complaints Procedure

Prior to commencement and, where required, the project manager will provide a mobile number as a site contact number.

If contacted with a complaint, noisy works will immediately cease. A record of the nature of the activities being undertaken at the time of complaint will be evaluated. The complaint would be referred to the TATA complaints procedures (see appendix F)

All complaints will be recorded – time, date, and nature of complaint, and proposed action with immediate effect. The following personnel will be responsible for the safety and environmental management of this project:

- Mr David Cobern, Demolition Director, 07971 063966
- Mr Luke Blackwell, Project Manager, 07388222298
- Mr Julian Davis, Health and Safety Director (Visiting), 07500722658

31. Co-ordination and Co-operation of Subcontractors

The general co-ordination of subcontractor's activities will 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 monthly basis.

Detailed co-ordination of work activities being undertaken by groups of subcontractors working in the same or similar vicinity will be achieved by HCD's permit to work system and 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.

32. Project Performance Review Meetings

The purpose of these meetings is to review recent HSEQT performance, listen to any contractors issues, to plan future activities and to ensure that all HSEQT issues associated with the Project are suitably addressed. Resultant information will be issued to all affected contractors.

33. Employee Consultation

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

HCD will ask representatives from the Project to report any concerns on site to Site Management via the HSEQT Employee Consultation. We 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 site.

The HSEQT Employee Consultation meetings will be held on a two-monthly basis. Those present will be asked to report any issues that may be of concern without recrimination.

All immediate environmental risks and concerns should be reported directly to the Project Manager. All Site HSEQT Employee Consultation Meetings will be recorded and actioned via HSEQT Employee Consultation Record.

34. Public Consultation

Not Required

35. Site Layout Plan for the Works –

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

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

- Sequence of development;
- Site access and exit points;
- Proposed pedestrian routes and crossing points;
- Proposed site traffic routes;
- Permanent and temporary fencing;
- Demolition compound location;
- Delivery routes to loading / unloading areas;
- Proposed lay-down areas;
- Public roadways connecting to the site;
- Noise, vibration and dust receptors;

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).

36. Demolition Compound

HCD have taken into account the impact of the compound location on the environment before choosing the area east of A9. To reduce our impact further, we will:

- Introduce one-way systems to avoid the risk of reversing vehicles [where possible] also reduce the nuisance of reversing alarms;
- Direct site lighting away from adjacent buildings;
- Use silenced generators;
- Cover / damp down stockpiles of dusty material in dry weather
- Make a connection to the internal TATA foul sewer to dispose of sewage and wash effluent.
- Store fuel, oils and other hazardous chemicals/materials in a bunded COSHH store in accordance with the legislation, away from drains and watercourses;
- Ensure all drainage systems are known – type, location, flow and emergency response required for accidental contamination or spillage of drainage system.

37. Site Rules

The Project Manager will produce a set of project specific Site Rules (see Appendix B). 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 site rules, or is observed carrying out an environmental non-conformity, HCD Ltd will take appropriate action to make the site safe and notify both the individual and their company in writing of the breach.

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

38. Visitors

All visitors must sign in before they enter site. They will only be allowed on to site if they have undergone HCDs visitors site induction and signed to confirm their understanding-Visitors MUST be accompanied by an HCD authorised representative whilst on site.

It is the HCD's responsibility to ensure that the visitor is accompanied at all times and complies with the site rules. Visitors failing to comply with the site rules may be refused access to site.

39. Site Access – Vehicles

Signage will be erected to identify the routes to be taken by demolition traffic entering the Site. Similarly, signage will be installed for traffic to show the preferred routes around the demolition works areas.

The demolition areas on the site will be contained within gated demolition compounds surrounded by hoardings or secured fencing.

All Access points into the demolition compounds will be via purpose made gates. Appointed trained Traffic Marshalls, will man the gates (where required) and ensure that the deliveries anticipated, are efficiently and safely directed to their off-loading point within the site. If the need for site vehicles to reverse arises, whether within or outside of the site compound, this MUST be undertaken with assistance from trained banks persons. All gates will be closed and locked when not in use.

Vehicle wheel washing facilities will be provided at gates (if necessary) where vehicles can exit the demolition site, in accordance with industry best practice. The exact location of these washing facilities will be at the main working site entrance and will be on a hardstanding so as to mitigate the risk of mud and eliminate the risk of cross contamination of soils.

On site vehicle parking bays for demolition and delivery vehicles will be within the demolition compounds.

To lessen the impact of site traffic and their contribution to carbon emissions from vehicle exhaust gases this impact will be controlled by the following measures: -

- Vehicles will access and egress via the main TATA Entrance, vehicles will follow the designated traffic routes to and from the site back to TATA main entrance, out of TATA security to the A4810 road
- The nominated route to and from site through TATA entrance will be advised in writing to all interested parties particularly the waste lorry companies.
- Minimising the number of vehicles coming to and from site, a designated management representative will be appointed to act as the Site Transport Co-ordinator who will manage all

the waste removal collections and documentation, and for the efficient ordering and delivery of site consumables, all of which will be at agreed appointed times

- All such vehicle movements will be under the strict control of appointed Banksman and this system will be subject to a site speed limit of 10mph
- The site management will check the use of the designated routes by waste lorries leaving site.
- No vehicles will be allowed to park in any of the adjacent roads particularly with engines left ticking over, as there will be parking within the constraints of the site.
- All waste collection lorries will try to use the same drivers to enable them to be familiar with all site requirements and the determined haul routes to their disposal destinations and the agreed site access / egress.

40. Proposed Traffic Routes

Where possible supply materials and demolition arisings will be procured / removed to destinations within the area to aid local businesses and suppliers for processing / recycling. This includes all scrap, rubbish and concrete.

All materials will be loaded within the fenced off area in central locations so that perimeter buildings act as a natural screen. All vehicles will be escorted in and out of the access/egress gates by trained banksman.

It is estimated that there will be a maximum of 18 lorry movements per day at peak;.

- Works vans daily x 18
- Initial deliveries of plant x 12
- Daily during soft strip, 4 movements 2 or 3 days a week some weeks none
- Scrap removal Bulkers x 12 per day x 5 per week on a sporadic time table due to lapses in demolition during the contract period demolition

Vehicles arriving and departing site will either be

- Low Loaders
- Artic units and trailer
- 8-wheeler lorries DAF85 8x4's – 380hp engine size
- 40 yd – Scania 4 series 8 x 4 – 380hp engine size
- Vans
- Cars

Demolition vehicles will enter via the main TATA site entrance. All contractors and suppliers will be notified of the agreed demolition vehicle routes on the road network to reach HCDs site entrance and back to the main entrance.

Vehicles observed as not complying to the agreed demolition vehicle routing plan will be banned from the site.

All signage for routes, demolition sites and site gates will comply with the Safety Signs and Signals: The Health and Safety (Safety Signs and Signals) Regulations 1996 : Guidance on Regulations to identify areas and direct drivers to the relevant locations.

41. Site Access – Pedestrians

Site operatives will enter the main TATA security gate sign in and travel via the authorised route to the hot mill demolition compound, where they will change at the welfare facility prior to entering the turnstile work area. The pedestrian access route will be segregated from the vehicular routes where practicable. A Traffic Management Plan (TMS) plan showing these routes will be displayed at the pedestrian entrances and suitable internal locations.

Crossing places, signage and enhanced lighting will be erected at all locations where pedestrian routes cross vehicle routes within the marked area.

Pedestrian footways on the road network and other roads surrounding the site will be kept clear at all times.

42. Deliveries

A delivery management system will be employed on the project. All deliveries will be required to be booked in advance to ensure that deliveries are timed to prevent a backlog of vehicles and thus disruption to surrounding area. Gatemen will ensure, as far as practical, that only anticipated deliveries to site are accepted and any vehicles attempting to deliver without complying with this system will be refused access.

All plant deliveries will be coordinated to be delivered out of peak times, whenever practical, to avoid any congestion around the locality some will be subject to Police escorting vehicles to the site

All deliveries will be co-ordinated with TATA security

All goods deliveries will be to a designated loading/unloading area on site where all vehicles will be unloaded and the materials taken to the appropriate storage area Security



APPENDIX A

DEMOLITION NEWSLETTER

Reference: - Issue one

19/09/2025

REF: Strip Out and Structural Demolitions by HCD Ltd

HCD has been appointed as the Main Contractor to carry out the strip-out and demolition works of the existing Llanwern Hotmill. The project is expected to span approximately three years, with an initial lead-in period of eight weeks prior to the commencement of structural demolition.

The scope of work includes structural demolition, which will be the most noise-intensive phase of the project. During the first four weeks, we will install perimeter fencing, begin internal strip-out of the structures, and conduct site investigations to inform the final design. Structural demolition will then proceed on a bay-by-bay basis over a 30-month period, utilising a range of specialised demolition excavators.

All works will be carried out in accordance with the approved planning conditions and the Demolition Environmental Management Plan. HCD is committed to minimising disruption and will take all reasonable measures to protect nearby residents and commercial occupants from noise, dust, and other environmental impacts. We apologise in advance for any inconvenience caused during the course of the works.

To keep our neighbours informed, we will issue a monthly programme update outlining upcoming activities and progress on site.

The Senior Project Manager for this contract is Mr Luke Blackwell, who will be on site daily from 8:00 AM to 6:00 PM and can be contacted on 07388222298 for any queries or assistance. For any issues arising outside of working hours, Mr Blackwell is also available as our 24-hour Liaison Manager on the same number.

Thank you for your understanding and cooperation.

Yours faithfully,

D. Cobern (MIDE)
Operations Director

APPENDIX B

SITE RULES

1. All personnel shall be properly and correctly trained for the work on which they are employed;
2. Comply with safe systems of work and refer to risk assessments
3. Personal protective equipment appropriate to the task being carried out shall be worn at all times;
4. No drugs or alcohol shall be allowed on the site, or any person who is considered to be under the influence of drugs or alcohol;
5. Smoking is not permitted within the site
6. All dust, noise and pollution shall be kept to a minimum and all measures are to be taken to prevent any nuisance to residents or adjoining owners arising from the carrying out of the works.
7. Work With or Disturbance of Asbestos

Personnel are not permitted to undertake any work on asbestos products, or asbestos insulation. This work must only be undertaken by licensed asbestos removers (i.e. those who hold a current licence issued by the Health and Safety Executive).

In order to avoid unintentional disturbance of asbestos personnel are required to avoid any actions which would disturb such asbestos. If personnel working on site identify material during the works, which is suspected of containing asbestos, the individual must immediately stop the work and contact the CDM Co-ordinator.

8. Radios, cassette players, personal stereos or similar are prohibited;
9. Radio transmitters are not permitted;
10. There are restrictions to the use of percussive, hammer action tools or other tools or plant that may cause vibrations to adjacent buildings;
11. Any machinery used must be in good condition, with dangerous parts effectively guarded.
12. No personnel, including visitors, are to have access to the site without fully complying with site access permit requirements. Visitors must be accompanied at all times;
13. There is to be no unauthorised advertising or publicity unless permission has first been obtained in writing from the client;
14. Parking for vehicles will be in the site car park
15. Any person using abusive language, wolf whistling or similar will be expected to be removed by the Principal Contractor from the site;
16. No fires on site; the Principal Contractor must comply with the Joint Code of Practice Fire Prevention on Demolition Sites.
17. Lone working on site is not permitted;
18. All site operatives and personnel, including visitors, shall be aware of the evacuation procedures in the case of an emergency;
19. Mobile phones must not be used on site when working
20. Both visitors and operatives are to wear - Safety boots, hardhat, hi-vi vests, and appropriate gloves whilst on site.
21. All meals to be taken in specified welfare areas only.
22. All access and escape routes are to be kept clear at all times
23. All unsafe conditions must be reported to the appropriate manager immediately
24. All accidents must be reported to the appropriate manager immediately
25. Dispose of all waste materials in the correct manner.

APPENDIX C

NOISE, DUST AND VIBRATION MONITOR SPECIFICATION

Contract Details	
Project Name:	Llanwern Hotmill
The Client:	TATA Steel Europe
The Principal Contractor:	Haywood Crushing Demolition Ltd Unit 14 Haywood Industrial Complex Wellington Hereford HR4 8DZ
Operations Director:	Dave Cobern dave.cobern@hcdltd.com 07971063966
Project Manager:	Luke Blackwell Luke@hcdltd.com Gerald Simpson gerald.simpson@hcdltd.com
HSEQT Director:	Juls Davis julian.davis@hcdltd.com 07500722658
Local Authority:	Newport City Council Civic Office, Godfrey Road, Newport, NP20 4UR
Contract Start Date:	1 st September 2025
Contract Completion Date:	31 st August 2028
Project Address:	Llanwern Works, Newport NP19 4QZ
Project Working Hours: Newport City Council Recommended Working Hours	Monday to Friday: 07:00 hrs – 19:00 hrs Saturdays: 07:00 hrs – 17:00hrs Sundays: 07:00 hrs – 16:00hrs hours except by prior agreement with Local Authority
Project Out of Hours Emergency Contact:	07971063966

Scope of the Project
Full demolition of structures removal of down to top floor slabs to agreed levels.

Local Community and Sensitive Receptors		
Buildings / Property Types	Details	Implications
Glan Llyn Llanwern	Housing to the East over a kilometre away down wind of the prevailing wind	Noise from works, dust, vibration (unlikely)
Sensitive Industrial, Engineering and / or Manufacturing Operations	Industrial Complex close to the Eastern boundary controlled by St Modwen	Noise from works, dust, vibration
Sensitive Industrial, Engineering and / or Manufacturing Operations	Industrial Complex on the opposite side of Queensway A 4810	Should not affect this area too far for Noise from works, dust, vibration

Community Communications
Our objective is to carry out the demolition of the former TATA Llanwern Hot mill utilising methods that that minimise inconvenience to local businesses, neighbours, and the general public. This will involve implementing 'Good Neighbour' protocols, If required Carry out Letter drop detailing the following: • Nature of Works to be carried out. • The proposed working hours • The expected duration of the demolition Works • Contact detail of a main contact on the site in case of complaints. Responsible Site Operations All site personnel including Sub-contractors will be made fully aware of the need to minimise polluting activities on site, keeping noise to a minimum.
Methods Proposed
Monitoring

The site and surrounding areas will be frequently monitored to ensure that the mitigation controls for both noise and dust are effective and not causing a problem to neighbouring properties these will include

Subjective noise assessments to monitor if the noise coming from the site is reasonable.

Carry out numerical noise predictions (if required)

Contacts and Communication Completed to Date

To be completed as the contract progresses:

Noise and Dust Management and Monitoring Arrangements

Monitoring Hardware to be used

NOISE MONITOR – SONITUS SYSTEMS

- IEC 61672 Class 1 measurement system;
- Automatic upload of data to the cloud;
- SMS and email alerts;
- Very compact requires 110v or 240v mains power;
- Battery or solar panel option Not included in proposal;
- Download data directly from the website for reporting – Sonitus Cloud.



DUST MONITOR

- MCERTS certified PM10 dust monitor
- SMS and email alerts – can be triggered on 15 minute periods as required.
- 110v power
- Automatic upload of data to the cloud for reporting
- Optional ultrasonic weather station (picture next to Aeroqual cabinet)
- Download data directly from the cloud for reporting



The following hierarchy of management and control will be applied to all activities and operations through-out all phases.

Dust Management Plan :

Mitigation measure

- Develop and implement a stakeholder communications plan that includes community engagement before work commences on site
- Display the name and contact details of person(s) accountable for the air quality and dust issues on the site boundary
- Display the head office contact information on site boundary.

Mitigation	Mitigation Measures
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Noise and Dust Management and Monitoring Arrangements	
Mitigation for TATA Llanwern Hot Mill	Develop and implement a series of dust management measures and monitoring measures detailed below. Monitoring may include monitoring of dust deposition, dust flux, real-time PM10 continuous monitoring and/or visual inspections Site Management - Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken. - Make the complaints log available to the local authority etc. as soon as reasonably practicable. - Record any exceptional incidents that cause dust and/or air emissions, either onsite or offsite, and the action taken to resolve the situation in the logbook. - Hold regular liaison meetings with other sites within 100 m of the site boundary, to ensure plans are co-ordinated and dust and particulate matter emissions are minimised. In particular, it is important to understand the interactions of the off-site transport/deliveries which might be using the same strategic road network routes. The works will be carried out by adopting the principles of best practice with Calculations in Accordance from ABC limits from BS5228-1 parts 1, 2 and 3, and the Code of Practice for Noise Control on Demolition and Demolition Sites. - Make complaints log available to local authority when asked - Record any exceptional incidents that caused dust and or emissions, either on or off site and the action taken to resolve the situation in the logbook. Monitoring - Undertake daily on site and off site inspections where receptors (including roads) are nearby to monitor dust and record inspections - Carry out regular site inspections to monitor compliance with the information detailed above record inspection results

Noise and Dust Management and Monitoring Arrangements	
	Dust control • Soft strip prior to demolition of structure • Leave sections of the building in place to stop wind spread dust • Use atomiser spray to mitigate dust during demolition • The cutting of concrete will not be carried out, concrete will be either by pulverising or by hydraulic breaking; both methods avoid impact on the substrate materials thus reducing noise and vibration; • All loaded lorries leaving site will be sheeted. • HCD Ltd will ensure no dust release, especially PM10 size dust which influence human health, known sources are Diesel engine exhausts and dust from the demolition industry. • Activities that generate large amounts of dust will be avoided during windy conditions • Dust will be controlled with an automated dust boss spraying a fine mist spray during demolition and where required • Handling of materials will be kept to a minimum • Damping down of haul roads, speed limits will be lowered, site traffic will be kept to watered and or treated haul roads • Wheel cleaning facilities where required • Wet Road sweeping as required • All crushing and screening will be carried out in strict accordance with the Local Planning Pollution Prevention and control permit for the process completed prior to any crushing being undertaken • Water sprays on the crusher • Operatives have been trained (Site Environmental Awareness Training) and TBT will be given as and when necessary.

Noise and Dust Management and Monitoring Arrangements

Noise Control'

- No vehicles or plant will be left running idling unnecessarily.
- Ensuring the location of sensitive receptors around the site and nature of the works when locating equipment.
- Care will be taken when loading or unloading vehicles to minimise disturbance to residents.
- Delivery vehicles will be prohibited from waiting within the site with their engines running.
- All plant items will be properly maintained and operated according to the manufacturers recommendations in good working order ensuring it is properly silenced to avoid causing excessive noise and meets statutory emission standards. All plant should be sited so that the noise impact at nearby noise-sensitive properties is minimised. All serving of plant will be carried out within the Council's recommended times
- Local hoarding, screens or barriers will be erected as necessary to shield particularly noisy activities.
- Problems concerning noise from demolition, can sometimes be avoided by taking a considerate and neighbourly approach to relations with local residents.
- Under part IV of the Environmental Act 1995 and the Governments UK Air Quality Strategy, local authorities are required to work towards achieving national air quality objectives. All personnel to be made aware.
- Stockpiles of crushed/uncrushed materials will be kept watered/damp
- All plant will be effectively silenced and maintained, with engines being switched off when not in use
- Noisier Plant will be sited away from Homes, offices and other sensitive receptors, demolition will commence at then eastern end of the site leaving side walls up to mitigate any noise/dust.
- Vehicle reversing alarms will be set at the minimum for safe and efficient operations
- Restricting drop heights during lorry loading.
- The selection of plant, equipment and systems of work should maintain due consideration to outputs and permitted levels.
- The adoption of Best Practicable Means, as defined in the Control of Pollution Act 1974 is usually the most effective means of controlling noise from demolition and demolition sites. The following measures will be implemented as appropriate.
- Phasing the works to minimise the benefit from perimeter structures.
- Adequate planning will be made to ensure that the demolition can be completed within the permitted hours

Noise and Dust Management and Monitoring Arrangements

- Pneumatic tools will be fitted with silencers or mufflers.
- Deliveries will be programmed to arrive during Councils recommended hours only.

Light Pollution

Site lighting will be positioned and directed so as not to intrude unnecessarily on near by buildings and land uses and adjoining public highways

APPENDIX D

ROLES & RESPONSIBILITIES

Organisations and arrangements

LEADERSHIP

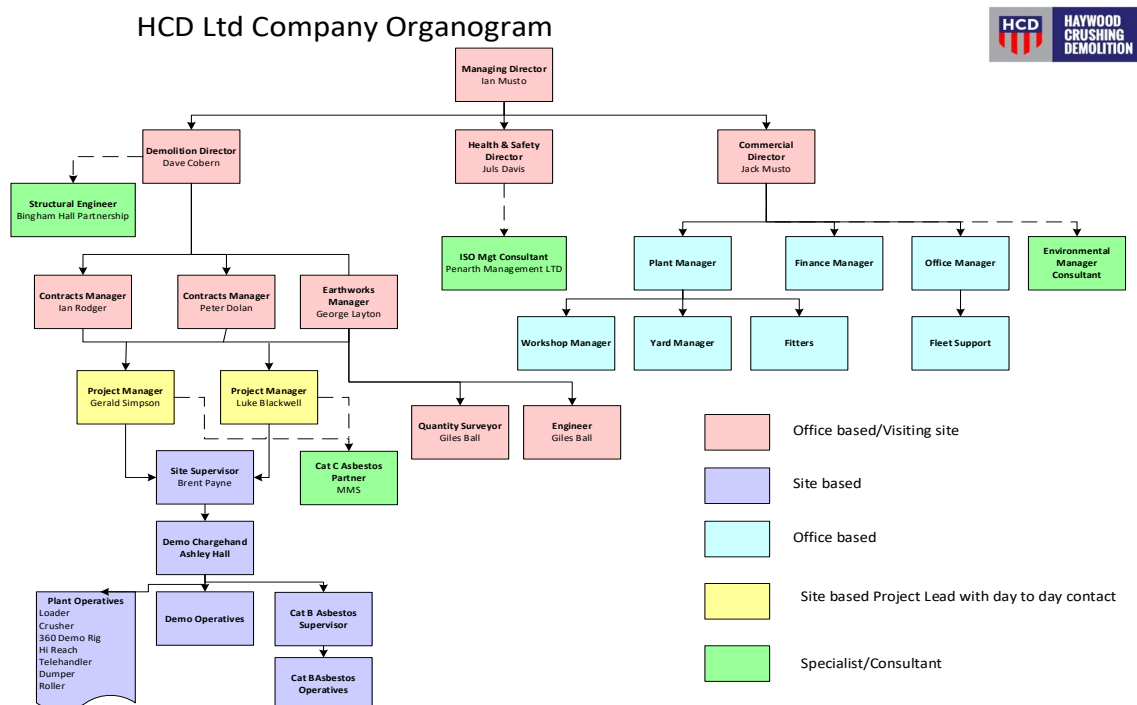
Leadership and Commitment

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', written over a horizontal line.

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 minimise 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

The 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.

All persons associated with the project will comply with HCD's environmental policy and relevant environmental legislation.

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 & the Environment 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 E

TATA STEEL



Environment Standard - Complaints

Standard

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Names of Initial Circulation:

Refer to scope to determine employees to who this standard is required to be communicated. The key contact list for each site can be found here - [Link](#)

18 Scope

To ensure compliance with this standard, the following sites are required to adhere:

Applicable Sites/Works Areas		
Port Talbot	Llanwern	Shapfell

18 Objectives

The objective of this Complaints Standard is to establish a clear, consistent, and accountable process for the receipt, management, investigation, and resolution of complaints across all channels. It aims to:

- Define the roles and responsibilities of all persons involved in the complaints process
- Ensure that all complaints, whether received through approved or unapproved channels, are recorded, assessed, and addressed appropriately.
- Promote fair handling of internal and external complaints, including those raised by community members or litigation stakeholders.
- Support root cause analysis and continuous improvement through structured investigation and route cause reporting.
- Provide transparent escalation, feedback, and reporting mechanisms to improve stakeholder confidence and service delivery.

18 Responsible Persons

Responsibility	Responsible Person
To ensure that the correct resources are allocated for complaints handling, investigations, & communications.	Head of Environment, Operations
To ensure that the correct resources are allocated for complaints investigations.	Works Manager(s)
To manage and improve the complaints system.	Central Environment Lead Governance
To monitor and input necessary details in the Environment Complaints system.	Central Environment Claims Handling Team Site Security Team
To complete all allocated complaint investigations and determine root causes where able.	Site Environment Responsible Personnel
Responsible for making final decisions regarding complaints/claims that have been escalated.	Head of Environment, Operations UK Legal Team

18 Process Flows

All complaint process flows can be found in the following guidelines [Complaint Guidelines](#)

18 Methodology of Complaints

There are 2 ways to make an environmental complaint:

1.5

2.5 Regulator

For Welsh sites - Members of the community can report a complaint anonymously through Natural Resources Wales via their online incident form [Report an incident \(smartsurvey.co.uk\)](#) or by calling their 24/7 incident reporting line on 0300 065 3000. This incident report is sent directly to The Environment Operations Team inbox (community.support@tatasteeleurope.com). NRW/EA are responsible for informing the complainant of the next steps of the process.

3.5 Via Online Form

Members of the community can report a complaint electronically via TSUK's online complaint form- [Complaint form | Tata Steel UK](#)

18 Receipt of complaints through approved channels

All complaints need to be inputted on the Environment Complaint System [Environmental Team](#)

[| Cases | Salesforce](#) where they can be tracked.

1.5 Complaints received via The Regulator

For Sites based in Wales:

All complaints received through NRW are sent to The Environment Operations Team inbox (community.support@tatasteeleurope.com). These complaints are added to Salesforce by a member of the Environment Governance team each morning for the previous 24 hours. The PDF sent by NRW is to be uploaded to Salesforce by creating a new report.

1.1 Complaints Received via Online Form

All complaints received via online form are automatically pulled over to the Salesforce website. Notification of new complaints added to the system are sent to specific email addresses every morning.

All complaints should be validated by a member of Central Environment to check for accuracy and added to the relevant central governance forum.

18 Receipt of complaints and/or claims from Group Litigation participants

When the complainant's details are inputted into the Environment Complaints System the system will flag automatically if the complainant (or address) was a part of the group litigation.

Complaints from participants in the Group Litigation will be handled as per the standard process.

Participants in the Group Litigation who proceed to make a claim should be sent a referring them back to their solicitors in the Group Litigation. No further action should be taken and Head of Environment, TSUK should be informed (who will notify TSUK Legal).

In the case that there is a change to the Litigation register i.e. group litigation participants home address. the Environment Governance Team should be notified straight away to make changes to the system.

18 Receipt of complaints through unapproved channels

1.5 Complaints received via unapproved channels

In the case that a community member has contacted TSUK personnel via a channel that is an unapproved method of making a complaint, the TSUK personnel must redirect the complainant to the correct channels by responding to the complainant using [Registering a complaint - formal response](#) as soon as possible.

18 Recording & Reporting of complaints receipt

Once all internal complaints have been added to the Salesforce system all complaints from all complaint channels need to be reported into the relevant central environment governance forum.

These figures are reported in the TSUK Operations weekly meeting each Tuesday

18 Complaint Allocation and Assignment

- 1.5 Complaints are assigned by works areas/sites. Following the key contact list will allow for the correct person to be assigned the complaint for investigation.

[Environment Key Contact List.docx](#)

18 Complaint Investigation

- 1.5 Complaints are investigated by the relevant personnel following [Complaint Investigation Guidelines](#). All complaint investigation process flows and procedures can also be found within the complaint investigation guidelines.

Once the Complaint Investigation is completed it needs to be sent to the Site Environment Manager and the Head of Environment for review the quality of investigation and actions to understand issues, prevent reoccurrence and escalate if needed.

18 Complaint Route Cause Reporting

1.5 NRW Complaints Report

Once all complaints are completed the route cause needs to be submitted to NRW on request. This is done by creating a report using [NRW Report Template.xlsx](#). This is converted into a PDF and sent to industryregulation.swwales@cyfoethnaturiolcymru.gov.uk.

2.5 All Complaints

All complaint route cause information should be reported back in the relevant central and site governance forum.

18 Claims management – external (community)

1.5 Initial Claim

Each member of the community who has submitted a complaint relating to fallout (excluding NRW complaints) has the right to submit a claim to TSUK's claims department within 10 days of making an original complaint. Claims should be submitted to community.claims@tatasteeleurope.com.

A claim can be submitted for fallout on vehicles, exterior property/items and interior property/items. What is being claimed for should be stated in the initial claim email along with photographic evidence of these items. This will be managed by TSUK's claims department and supported by central environment. The claims procedure process flow can be found here: [Refer to slide 5](#)

2.5 Vehicle cleaning

For claims relating to vehicles, once an investigation has been completed the claims department will make a final decision on whether the claim should be accepted or rejected. If the complaint is accepted a clean will be offered to the complainant. A 'claim accepted' letter is sent to the complainant and they have 14 days to sign and return the letter so cleaning can commence. If the clean is accepted from the complainant the claims department will pass the details to the approved contractor who will make the relevant contact with the complainant.

The contractor representing TSUK will carry out the cleaning following an agreed contract [Vehicle Cleaning](#). Once work is complete job satisfaction documents and an invoice will be sent to the claims department as per the agreed contract. Performance is reviewed in a contract review meeting attended by both Contract Valeting representatives and TSUK representatives. The vehicle claims procedure process flow can be found here: [Refer to slides 6&7](#)

3.5 Internal cleaning & exterior property cleaning

For claims relating to the interior of the property and exterior of the property, once an investigation has been completed and it is deemed that TSUK is responsible for the fallout an initial assessment of the property needs to be done by the approved contractor. The claims department will notify the approved contractor that an assessment needs to be taken out on the items listed in the initial claim. Arrangements will need to be made with the complainant to visit the property. Once an assessment has been carried out the approved contractor will need to create a quotation and send it directly to TSUK's claims department. .

If agreed cleaning will commence following the correct standards outlined in the contracts for external and internal property cleans: [Property Cleaning](#). The internal & external property claims procedure process flow can be found here: [Refer to slides 8&9](#). If a complainant has claimed for vehicle cleaning as well as property cleaning this will follow both the vehicle cleaning process and internal/exterior property cleaning process separately.

4.5 Complainant request for compensation

If a complainant requests compensation as part of their claim – The Claims Team must respond using [Letter 4e - Claim Non-Cash Payment](#) as we do not accept requests for compensation. We only provide remediation using approved contractors.

18 Complaint/Claim escalation

If a complainant is unhappy with the outcome of their complaint and/or has requests that are outside of TSUK's procedures – the complaint will need to be escalated to the Head of Environment with the contact details included in the letter response.

18 Claim status notification.

The complainant will be notified regarding each part of the process by letter via email or post (if no email) [Complaints and Claims Letter Procedure.docx](#). Each letter has a notification banner that clearly shows the stages of the complaint process.

18 Complaint closure & feedback

Once a complaint has been completed a closure letter is sent to the complainant by letter via email or post (if no email). [Complaints and Claims Letter Procedure.docx](#) The closure letter will outline the root cause of the complaint if required along with a glossary of terms. All closure letters, claim-related and complaint-related, will have a link and QR code to a feedback survey.

18 Feedback response review

Each closure letter will contain a QR code for complaints to provide feedback to TSUK. This feedback is sent directly to. The feedback is collated and are be raised in the relevant central and site governance forums where actions can be taken.

18 Internal Complaints

Internal complaints are made by employees and contractors on-site to their local site representative.

However, at Llanwern, if an employee or contractor would like to report an incident will visit their site environment representative to inform them of the incident. DCP or the site environment representative will take the details of the incident and take photographic evidence which is sent to the claims team for review. The employee/contractor will also be advised to send their details to the Claims Team via email.

1.5 Receipt of complaints

Once the report has been reviewed by the claims team it is then forwarded to the site environment manager.

2.5 Recording and reporting of complaint receipt

All internal complaints are managed at site-level.

3.5 Complaint allocation and assignment

To assign complaints to site specific people we need to change the case owner.

4.5 Internal Claims Management

Once the Claims Team have reviewed the conclusion of the investigation they will make a decision on remediation for the vehicle.

If the investigation concludes that TSUK is the source of the event, remediation will be initiated by passing on the complaint details to the contractor. The contractor will contact the complaint to arrange cleaning.

If the investigation concludes that TSUK is not the source of the event, the Claims Team will liaise with the employee to close the claim.

If the employee is not happy with the outcome of the claim then this will be reported to the Site Manager.

5.5 Claim status, closure and reporting

The Claims Team will liaise with the complainant to let them know the status of the claim via email.

Once remediation has taken place the contractor will advise the Claims Team by sending over the relevant information. The Claims Team will close out the complaint via email to the employee/contractor.

