

R&M POLICY · ENVIRONMENT AND SOCIAL VALUE

Environmental Implementation Plan

R&M Property Group Ltd

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Approved by	Thom McKenna, Director
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1. Purpose

This Environmental Implementation Plan sets out the documented arrangements R&M Property Group Ltd (R&M) uses to put its Environmental Management Policy (Rev 2.0) into practice. It explains how R&M meets its legal environmental responsibilities, how those arrangements are communicated to employees, subcontractors and the wider workforce, and how we control, monitor and record our significant environmental impacts, including sustainable materials procurement, waste management and energy management.

It also sets out how R&M responds to, monitors and records environmental incidents, emergencies and complaints, and how we check that these arrangements are effective.

The plan applies to R&M's office and to every project and site R&M manages. On each project, the site-specific arrangements are recorded in the Construction Phase Plan and, where appropriate, a Site Waste Management Plan and a Construction Environmental Management Plan required by the planning consent.

2. Legal Responsibilities

R&M identifies the environmental legislation that applies to its work at tender and pre-start stage for each project. The main legal requirements and how we discharge them are summarised below.

Legislation	Key requirement for R&M	How R&M discharges it
Environmental Protection Act 1990 (s.34 Duty of Care) and Waste (England and Wales) Regulations 2011	Store waste safely, transfer it only to authorised persons, apply the waste hierarchy and keep waste transfer notes for 2 years	Carriers and sites checked on the Environment Agency public register before use; waste transfer notes filed per project; waste hierarchy declared on transfer notes; Disposal Off-Site Record kept on site
Hazardous Waste (England and Wales) Regulations 2005	Segregate hazardous waste and move it only under a consignment note, kept for 3 years	Hazardous waste stored separately and labelled; consignment notes filed with project records
Environmental Permitting (England and Wales) Regulations 2016	No unpermitted discharges or waste operations; use of registered exemptions where required	Excavated soils reused under the CL:AIRE Definition of Waste Code of Practice or a registered exemption; no discharges without the correct permit or consent
Water Resources Act 1991 and Water Industry Act 1991	Do not pollute controlled waters; discharges to sewer need the water company's consent	Drains identified and protected; silt and concrete wash-out controlled; site water discharged only with consent
Control of Pollution (Oil Storage) (England) Regulations 2001	Oil containers of 200 litres or more must be bunded or have secondary containment	Fuel stored in bunded bowsers and tanks; drip trays under static plant; daily plant checks
Control of Pollution Act 1974 (s.60 and s.61) and Environmental Protection Act 1990 (statutory nuisance)	Control noise, vibration, dust and other nuisance	Working hours agreed with the local authority; low-noise plant; dust suppression; section 61 consent sought where needed
Clean Air Act 1993	No dark smoke; no burning of waste	Burning of waste on site is prohibited on all R&M sites

Legislation	Key requirement for R&M	How R&M discharges it
Wildlife and Countryside Act 1981 and Conservation of Habitats and Species Regulations 2017	Protect nesting birds, bats and other protected species	Ecology surveys and planning conditions checked at pre-start; site clearance timed outside the nesting season or checked by an ecologist
Environment Act 2021 and planning conditions	Deliver biodiversity net gain and any environmental planning conditions (e.g. CEMP)	Planning conditions logged at pre-start and tracked to discharge by the project manager
Building Regulations Part L	Energy efficiency of the completed building	Fabric-first design; compliance checked through the design and Building Control process

Keeping up to date: the Compliance Officer monitors changes in environmental legislation through professional advisers, Constructionline, industry bodies and client and framework requirements. Relevant changes are reported to the Chair & CEO, this plan and the policy are updated, and the changes are briefed to site teams.

3. Communicating These Arrangements

R&M communicates its environmental policy and arrangements to employees, subcontractors and all other workers as follows:

Method	What is communicated	Who / when
Site induction	Environmental policy, site environmental risks, waste segregation, spill kit locations, drain protection, working hours, how to report an incident or complaint	Site manager; every person before starting work on site. Signed induction record kept
Toolbox talks	Rolling topics including waste segregation, spill response, fuel storage, dust and noise, protected species, energy saving and material care	Site manager; at least monthly and when site activities or risks change. Attendance recorded
Pre-start and subcontract meetings	Environmental requirements for the package, waste arrangements, method statement controls	Project manager with each subcontractor before they start. Requirements included in the subcontract order
Site noticeboard	Environmental Management Policy, emergency spill procedure, key contacts (including the Environment Agency incident hotline 0800 80 70 60) and the public contact for complaints	Site manager; displayed from site set-up
Daily briefings	Day-specific environmental risks, such as concrete pours, excavations near drains or deliveries	Site manager or supervisor; daily
Staff inductions and meetings	Policy, responsibilities and lessons learned from incidents	Chair & CEO / Director of Operations; at induction and in quarterly management meetings
Company website and on request	Environmental Management Policy	Available to clients, framework managers and the public

4. Sustainable Materials Procurement

- **Responsible sourcing:** timber is purchased only from legal and sustainable sources, with FSC or PEFC chain-of-custody certification requested on orders. Suppliers with BES 6001 or equivalent responsible sourcing certification are preferred where available.
- **Specification:** designs specify durable, low-maintenance materials, recycled content where quality and safety allow, and products with lower embodied carbon. Modern methods of construction are used where they reduce material use and site waste.
- **Supplier selection:** the Procurement Manager assesses suppliers and subcontractors for environmental performance at onboarding, in line with the Sub-Contractor Selection and Monitoring Policy. Local suppliers are preferred to reduce transport.
- **Accurate ordering:** quantities are taken from measured drawings and ordered for just-in-time delivery to avoid over-ordering and damage in storage.
- **Delivery control:** all deliveries are checked on arrival and recorded on the site delivery records (concrete, stone, pipe bedding and other materials). Damaged or incorrect materials are rejected.
- **Storage and returns:** materials are stored off the ground, covered and protected. Surplus materials are returned to suppliers where possible and recorded on the Material Returns record.
- **Hazardous substances:** lower-hazard products are selected where possible, and all substances are assessed and stored in line with COSHH.

5. Waste Management

- **Planning:** waste is designed and planned out at tender stage. A Site Waste Management Plan (or equivalent waste plan) is prepared for each project, setting out expected waste streams, segregation arrangements, carriers and destinations.
- **Waste hierarchy:** waste is prevented first, then reused, recycled or recovered. Disposal to landfill is the last option. Excavated material is reused on site wherever possible.
- **Segregation:** labelled skips or bays are provided for the main waste streams (for example timber, metal, plasterboard, inert and general). Hazardous waste is stored separately and securely.
- **Duty of Care:** waste carriers' licences and receiving sites' permits are checked on the Environment Agency public register before first use. Every load leaving site is recorded on the Disposal Off-Site Record, backed by a waste transfer note or hazardous waste consignment note.
- **Monitoring:** waste contractors provide monthly returns showing tonnages and landfill diversion. R&M aims to divert at least 90% of construction waste from landfill, and performance is reported each quarter.
- **Office:** paper, cardboard and IT equipment are recycled; documents are issued electronically where possible.

6. Energy Management

- **Site set-up:** mains power connections are requested early to avoid or reduce the use of diesel generators. Where generators are needed, they are correctly sized, and hybrid or battery units are used where available.

- **Welfare cabins:** energy-efficient cabins with insulation, LED lighting, and timers or sensors on heating and lighting are specified.
- **Plant and vehicles:** plant is maintained, switched off when not in use (no idling), and modern low-emission plant is preferred. Deliveries are consolidated, and car sharing is encouraged.
- **Office:** LED lighting, switch-off policy, and a renewable electricity tariff where available.
- **Monitoring:** electricity meter readings and fuel deliveries are recorded monthly for each site and used to report energy use and greenhouse gas emissions.
- **Completed buildings:** fabric-first design, efficient building services and low-carbon heating are specified to reduce energy use by occupants.

7. Environmental Incidents and Emergencies

Each site has a Site Environmental Emergency Plan, included in the Construction Phase Plan and displayed on the site noticeboard. It shows the site drainage layout, the location of spill kits and drain covers, and emergency contacts. Spill kits suited to the materials on site are provided at fuel storage points and in plant.

In the event of a spill or other environmental incident, the following procedure applies:

Step	Action	Who
1. Stop	Stop the work and, if safe, stop the source (e.g. close a valve, upright a container)	Person who discovers the incident
2. Contain	Use the spill kit to contain the spill; cover or block nearby drains	Person who discovers it / site team
3. Report	Report to the site manager immediately. The site manager informs the Director of Operations the same day	Site manager
4. Notify	If pollution has entered, or may enter, a drain, sewer or watercourse, notify the Environment Agency (0800 80 70 60) and, where relevant, the water company or local authority	Director of Operations / site manager
5. Clean up	Clean up and dispose of contaminated materials as hazardous waste using a licensed carrier	Site manager
6. Record and investigate	Complete the Environmental Incident and Complaint Record (Appendix A). Investigate the root cause within 5 working days and agree corrective actions	Director of Operations
7. Learn	Brief the lessons to all sites through toolbox talks and review this plan if needed	Director of Operations / Compliance Officer

Spill response is included in site inductions, and a spill response drill is carried out on each project at least every six months. Near misses are reported and recorded in the same way.

8. Environmental Complaints

- **Contact:** a site contact name and telephone number for members of the public is displayed at the site entrance.
- **Recording:** all complaints (for example about noise, dust, mud on the road, deliveries or working hours) are recorded on the Environmental Incident and Complaint Record and entered in the project complaints log.
- **Response:** the complainant is contacted within 24 hours. The site manager investigates, takes corrective action and responds within 5 working days.
- **Review:** the Director of Operations reviews complaints monthly to spot trends and prevent recurrence. Complaints are included in quarterly reporting.

9. Monitoring, Records and Review

R&M checks that these arrangements are effective through inspection, measurement and review:

- **Weekly:** the site manager completes the Weekly Site Environmental Inspection Checklist (Appendix B) and closes out any actions.
- **Monthly:** Spectre Safety, R&M's external health, safety and environmental adviser, carries out a monthly site audit on every live project, covering environmental controls, waste records, energy readings, incidents, complaints and training records. Findings are reported to the Director of Operations, who makes sure actions are closed out.
- **Quarterly:** the Chair & CEO reviews environmental performance with the senior team, including waste diversion, energy and fuel use, incidents, complaints and corrective actions.
- **Annually:** the Environmental Management Policy and this plan are reviewed by the Chair & CEO and the Compliance Officer. Objectives and targets for the following year are set.

Records are kept as follows:

Record	Kept by	Retention
Waste transfer notes / Disposal Off-Site Record	Site manager, then project file	At least 2 years
Hazardous waste consignment notes	Site manager, then project file	At least 3 years
Delivery records and Material Returns	Site manager	Project file, 6 years
Environmental Incident and Complaint Records, investigations	Director of Operations	6 years
Weekly inspection checklists, audit reports	Site manager / Quality Manager	6 years
Induction and toolbox talk records	Site manager / Compliance Officer	6 years
Energy and fuel readings, waste returns	Site manager / Compliance Officer	6 years

10. Responsibilities

Responsibilities for environmental management are set out in full in Section 6 of the Environmental Management Policy. In summary: the Chair & CEO approves this plan and reviews performance; the Director of Operations is responsible for its implementation on site, incident investigation and complaints; site and project managers implement it daily; the Compliance Officer maintains records and monitors legal changes; and the Procurement Manager applies the materials procurement arrangements.

Document Control

Rev	Date	Description	Approved by
1.0	28 September 2026	First issue, implementing the Environmental Management Policy Rev 2.0	T McKenna, Chair & CEO

Approved and Signed

Name: Thom McKenna

Position: Chair & Chief Executive Officer, R&M Property Group Ltd

Date: 28 September 2026

Appendix A - Environmental Incident and Complaint Record

Field	Details
Type (tick)	☐ Incident ☐ Near miss ☐ Emergency ☐ Complaint
Project / site	
Date and time	
Reported by / complainant (name and contact)	
Description of what happened / complaint	
Immediate action taken	
Pollution reached drain, sewer or watercourse?	☐ Yes ☐ No If yes: Environment Agency notified ☐ Ref no:
Other bodies notified (water company, local authority)	
Root cause (investigation)	
Corrective and preventive actions (who / by when)	
Response to complainant (date / method)	
Lessons shared (toolbox talk date)	
Closed out by (Director of Operations) - signature and date	

Appendix B - Weekly Site Environmental Inspection Checklist

Project: Week ending: Inspected by:

Check	Yes / No / N/A	Action required
Environmental policy, emergency plan and contacts displayed		
Drains identified and protected; no silt or concrete wash-out reaching drains		
Fuel and oils in bunded containers or on drip trays; no leaks		
Spill kits in place, stocked and accessible		
Waste segregated correctly; skips labelled and not overfilled		
Waste transfer notes and Disposal Off-Site Record up to date		
Materials stored correctly and protected from damage		
Deliveries recorded; surplus materials returned where possible		
Dust controls in place; roads and access kept clean		
Noise controls and working hours followed		
Plant switched off when idle; generators correctly sized		
Meter readings and fuel use recorded this month		
Trees, hedgerows and habitats protected as required		
Any incidents, near misses or complaints recorded and actioned		
Toolbox talk on an environmental topic held this month		

Signature: Date: