

ENVIRONMENTAL MANAGEMENT STANDARD



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1. INTRODUCTION

Environmental management is the practice of reducing environmental risks to the natural environment, with the goal of achieving sustainable development.

The management of a range of key environmental risks such as resource use, greenhouses gases, waste, biodiversity, fuels, oils, gas and chemicals, control of contractors and preventing pollution form the basis of environmental management. Environmental management does not just cover our own activities and impacts on the environment, but that of our contractors and residents too.

These key environmental risks require careful management to ensure Cornwall Housing Limited (CHL) is compliant with the environmental legislative framework whilst also striving to improve our environmental performance, and that of our contractors.

This management standard sets out how CHL will manage its environmental risks, reviewing the regulatory framework, legislation, roles, responsibilities and management processes ensuring significant risks are managed effectively, and environmental opportunities are maximised where possible.

1.1 ENVIRONMENTAL POLICY

CHL recognises its everyday activities can impact the natural environment, both positively and negatively, therefore in order to manage the environmental risks, CHL has adopted an Environmental Policy.

CHL also recognises that the activities of its contractors and residents can have an impact on the environment, and through its relationship with these stakeholders, it has an opportunity to help influence these activities to reduce the negative impacts and increase the positive impacts.

The policy commits to the following;

- To comply with all relevant environmental legal and regulatory requirements
- To protect and enhance the natural environment and prevent pollution.
- To reduce our carbon emissions, increase energy efficiency and work towards Carbon Neutral Cornwall
- To minimise our waste by reducing, reusing and recycling where possible
- To conserve our natural resources by using materials and water sustainably
- To work with our contractors and suppliers to reduce the impact of the goods and services we buy.
- To support our residents to help reduce their impact on the environment and maximise their health and wellbeing through the provision of energy efficient homes and access to biodiverse-rich green spaces.

- To review and adapt our sites and services ready for a changing climate.
- To promote awareness and understanding of environmental issues
- To regularly monitor and review our environmental performance.

The policy statement is reviewed every three years by our senior leadership team, communicated to all of our employees and made available to external interested parties.

2. SCOPE

This Environmental Management Standard applies to all operational activities under the control and influence of CHL. This includes all associated sites, services, contractors, and suppliers.

3. REGULATORY FRAMEWORK

The following organisations regulate the environmental risks managed by Cornwall Housing. These regulators have the power to prosecute and serve notice on organisations which breach environmental legislation.

- Department of Environment, Food and Rural Affairs (DEFRA)
- Natural England (NE)
- The Environment Agency (EA)
- The Drinking Water Inspectorate (DWI)
- The Information Commissioner (ICO)
- Local Planning Authority (LPA)
- Cornwall Council (CC)
- Southwest Water (SWW)

3.1 Legislation

In order to ensure Cornwall Housing is compliant with all relevant environmental, legal and regulatory requirements, it maintains an environmental compliance register.

The register is stored in an electronic format on SharePoint and updated regularly by the Environmental Compliance Manager.

A summary of significant legislation is outlined below;

Waste

- Control of Pollution Act 1989
- Landfill (England and Wales) Regulations 2002
- End-of-Life Vehicles Regulations 2003

- Hazardous Waste (England and Wales) Regulations 2005
- Waste (England and Wales) Regulations 2011
- Control of Asbestos Regulations 2012
- Controlled Waste (England and Wales) Regulations 2012
- Scrap Metal Dealers Act 2013
- Waste Electrical and Electronic Equipment Regulations 2013
- Environmental Permitting (England and Wales) (Amendment) Regulations 2014
- Environmental permitting (England and Wales) Regulations 2016
- Environmental permitting (England and Wales) (Amendment) Regulations 2023
- The Environment Act 2021

Biodiversity

- The Countryside and Rights of Way Act 2000
- The Plant Protection Products Regulations 2012
- The Town and Country Planning (Tree Preservation) (England) Regulations 2012
- Environmental Damage (Prevention and Remediation) (England) Regulations 2015
- The Conservation of Habitats and Species Regulations 2017
- National Planning Policy Framework 2021
- The Environment Act 2021

Carbon reduction and energy efficiency

- The Climate Change Act 2008
- Building Regulations 2010
- Energy Performance of Buildings (England and Wales) Regulations 2012
- Energy Savings Opportunity Scheme Regulations 2014
- The Building Regulations etc. (Amendment) (England) Regulations 2021

Contract management and procurement

- Public Services (social value) Act 2012

Emissions to air

- Environmental Protection Act 1990
- Clean Air Act 1993
- The Environment Act 1995
- The Housing Act 2004
- The Fluorinated Greenhouse Gases Regulations 2015
- Ozone Depleting Substances Regulations 2015

Emissions to water

- The Public Health Act 1936
- The Building Act 1984
- The Water Resources Act 1991
- Control of Pollution (Oil Storage) Regulations (England) 2001
- Private Water Supplies (England) Regulations 2016
- Environmental Permitting (England and Wales) (Amendment) Regulations 2014
- Environmental Permitting (England and Wales) Regulations 2016
- Environmental Permitting (England and Wales) (Amendment) Regulations 2023

Hazardous substances

- Environmental Protection Act 1990 (as amended) PART IIA Contamination of Land
- Environment Act 1995: Part III
- The Asbestos (Licensing) (Amendment) Regulations 1998
- Control of Substances Hazardous to Health Regulations (as amended) 2002 (COSHH)
- Hazardous Waste (England and Wales) Regulations 2005 (Amendment 2009)
- Control of Asbestos Regulations 2012

Environmental Nuisance

- Control of Pollution Act 1974
- Environmental Protection Act 1990
- Noise and Statutory Nuisance Act 1993
- Clean Air Act 1993
- Clean Neighbourhoods and Environment Act 2005

4. ENVIRONMENTAL RISK MANAGEMENT

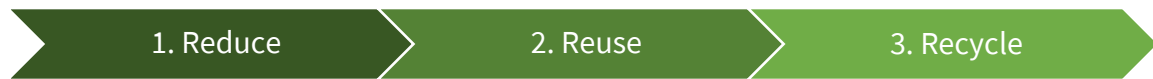
CHL maintains an environmental risk register which identifies and assesses the organisational environmental risks (impacts). The register is stored in an electronic format and is accessible on SharePoint.

The risk register is updated regularly by the Environmental Compliance Manager and reviewed by SLT on a monthly basis. CHL's significant environmental risks are outlined below by category.

4.1 Resources

CHL uses a significant amount of natural resources in its day-to-day operational activities.

The use of resources should follow the hierarchy below from an environmental (and often financial) perspective. It gives top priority to reducing resources required for use in the first instance.



1. Reduce

Keeping existing products for longer or using less material in design and manufacture.

2. Reuse

Checking, cleaning, repairing, refurbishing, whole items, or spare parts.

3. Recycle

Processing waste into a new substance or product.

Resources include (but are not limited to)

- Office supplies
- Water consumption
- Natural gas (fossil fuel)
- Heating oil (fossil fuel)
- Fossil fuel generated electricity
- Diesel / petrol (fossil fuel)
- Hazardous chemicals
- Wood and forestry products
- Construction materials

Resource consumption including energy, oil, gas, water and fuel should be monitored and reported as part of the environmental key performance indicators and reported to the Environmental Compliance Manager on an annual basis.

This information is used for wider environmental reporting such as ESOS and carbon monitoring and reporting.

4.2 Greenhouse gas emissions

Greenhouse gas emissions from human activity intensifies the greenhouse effect and has contributed to climate change. Carbon dioxide is the main greenhouse gas which comes from burning fossil fuels such as coal, oil and natural gas for electricity generation, heat and transport and accounts for more than half of the emissions in the atmosphere. Methane, Nitrous oxide and fluorinated gases (F gases) play a lesser role, however, remain a significant source of greenhouse gases in the atmosphere.

CHL is working alongside Cornwall Council's Housing Decarbonisation Strategy to reduce reliance on fossil fuels and reduce carbon emissions within its homes.

CHL is legally required to monitor and report on its own greenhouse gas emissions through the Energy Savings Opportunity Scheme, a mandatory energy assessment scheme for organisations in the UK.

Alongside this work, CHL is working to improve energy efficiency standards within our homes by adopting a fabric first approach to reduce the amount of energy required to keep our homes warm.

Please contact the Environmental Compliance Manager /Carbon Reduction Manager for further information.

4.3 Waste

Any waste produced by CHL or any of its contractors working on behalf of CHL must be stored, segregated, transferred and disposed of in line with the current waste legislation and supported by the correct waste documentation.

CHL must ensure the statutory requirements relating to waste are being managed correctly across the organisation, ensuring all waste carriers are licensed, all waste documentation is completed, stored correctly and legally, and CHL employees are confident they know how to undertake all the relevant waste compliance checks.

Contracting out waste management does not pass on the responsibility associated with Duty of Care regarding CHL's waste. If any contractor acting on behalf of CHL is found in breach of waste regulations, CHL will be held accountable through its Duty of Care to ensure its waste is stored, transferred and disposed of legally.

Please refer to the specific Waste Management Standard and accompanying guidance notes available on [SharePoint](#) for further information.

Please refer to the specific Wastewater Management Standard and accompanying guidance on SharePoint.

4.4 Biodiversity

CHL manages approximately 474,831m² of green space, 18,396m of hedgerows and around 11,000 trees (minimum) on behalf of Cornwall Council. Environmental regulation and legislation around the management of green space and biodiversity has been strengthened in recent years. Obligations and statutory requirements to manage our green spaces for nature recovery have never been greater.

There are numerous biodiversity related laws in the UK which aim to protect native species and vulnerable habitats from adverse impacts, for which CHL must ensure it is compliant with.

Please refer to the specific Biodiversity Management Standard and accompanying guidance notes available on [SharePoint](#) for further information.

4.5 Fuels, oils, gas and chemicals

Through the delivery of its operational services, and that of its contractors, CHL is responsible for the safe and legal storage, use, management, refuelling and disposal of fuels, oils, gas and chemicals which may have a harmful impact on people or the environment.

Regulated by both the Health and Safety Executive and the Environment Agency, CHL is responsible for ensuring compliance to ensure all its activities around the management of fuel, oils, gas and chemicals is undertaken correctly and in line with the relevant environmental, health and safety legislation (e.g., Control of Substances Hazardous to Health).

Any spills or environmental incidents should be dealt with effectively, minimising the impact on the environment, and disposing of any contaminated waste oils etc. correctly and in line with the waste regulations.

Please refer to the Pollution Prevention Management Standard and Spill Response Procedure available on SharePoint.

4.6 Control of contractors

Contracting out works does not absolve CHL of its environmental compliance responsibilities. If any contractor acting on behalf of CHL is found in breach of environmental legislation, or prosecuted by the regulator, CHL will also be held accountable.

During the procurement process, all contractors should be checked to ensure they have:

- Environmental Policy in place (or commit to Cornwall Housing's policy)
- Certified Environmental Management System ISO14001 (or similar)
- Evidence of environmental training and awareness such as toolbox talks, relevant

qualifications, etc.

- Waste Carriers licenses, permits and exemptions
- Waste management processes
- Pollution prevention and response processes
- No previous environmental convictions by the Environment Agency or any other environmental regulator

During the tender process, due diligence must be undertaken to ensure that the contractors is environmentally compliant before proceeding.

During the course of the contract, all contractors should be regularly checked through contract management and site inspections and audits. Any contractors removing waste or sub-contracting the removal of waste should ensure all waste documentation is sent to Cornwall Housing with the appropriate invoices.

Construction Environmental Management Plans (CEMPs) should be built into all major projects to guarantee that contractors are managing their environmental impacts as part of the contract, specifically, material and resource use, waste management, carbon emissions, pollution prevention, training and compliance.

Please refer to the specific Waste Management Standard and accompanying guidance notes available on [SharePoint](#) for further information.

Please contact the Environmental Compliance Manager for further advice and support.

4.7 Pollution prevention

Pollution is the addition of any substance (solid, liquid, or gas) or any form of energy (such as heat, sound, or radioactivity) to the environment at a rate faster than it can be dispersed, diluted, decomposed, recycled, or stored.

Please refer to the Pollution Prevention Management Standard and Spill Response Procedure available on SharePoint.

5. ROLES AND RESPONSIBILITIES

Anyone working on behalf of Cornwall Housing Limited has a duty to ensure the requirements of this Environmental Management Standard are met. Specific requirements are determined by each business area, however some of the key roles and responsibilities are summarised below:

Directors & Heads of Services

- Ensuring the principles of this standard are followed within areas of responsibility.
- Ensuring suitable and sufficient resources are available and allocated to ensure environmental compliance in accordance with legislation and industry best practice.

Environmental Compliance Manager

- Providing technical support on environmental compliance.
- Monitoring, reviewing, and reporting pollution prevention related performance.

Health & Safety Manager

- Ensuring that operational activities do not harm people.

Procurement

- Overseeing contractor performance, engagement, and communication.

Surveyors, Supervisors & Managers

- Managing operations in a way that prevents harm to both people and the environment.
- Developing suitable and sufficient risk assessments and method statements for work activities.
- Communicating risks, methods and expectations to operatives and contractors.
- Escalating and reporting all environmental issues, incidents, and near-misses in a timely manner.

Operatives & Other Employees:

- Working to the standards and expectations outlined by the site supervisor or site manager.
- Undertaking activities as instructed in accordance with risk assessments and method statements.
- Reporting all complaints, incidents and near-misses to supervisors and managers as soon as possible.

Contractors & Suppliers

- Preventing harm to people or the environment and working in accordance with the standards and expectations outlined by Cornwall Housing Limited.

6. TRAINING AND COMPETENCY

CHL provides Environmental, Health and Safety training to its employees and contractors. Employees of CHL are trained to undertake Environmental, Health and Safety inspections across their sites and submit their reports through Entropy.

CHL requires any contractors employed by CHL, who visit their sites and act as a third party in the delivery of CHL operational activity, have received environmental training.

Please contact the Environmental Compliance Manager for further information.

7. COMMUNICATION AND ENGAGEMENT

Communication and engagement is essential to ensure employees, contractors and residents have access to the correct information to enable them to manage environmental risks effectively.

7.1 Employees

The Environmental Policy should be communicated to all employees, displayed in offices, and available on both the website and CHL intranet.

Environmental management information to support the Environmental Policy is available on the CHL intranet Environmental Compliance pages, and through SharePoint.

These pages are managed by the Environmental Compliance Manager and updated regularly.

Please contact the Environmental Compliance Manager for further information.

7.2 Residents

The Environmental policy should be shared with our residents. Good communications on environmental issues can help enable residents to take positive action with regards the environment such as

- Increasing recycling
- Reducing / reporting fly-tipping
- Preventing and reporting pollution to air, land and water
- Increasing energy awareness and reducing energy consumption
- Be prepared for extreme weather and flooding
- Responding to flooding
- Reducing fuel poverty
- Reducing water consumption
- Promoting active travel

- Protecting the natural environment
- Improving health and wellbeing

7.3 Contractors

All new contracts should include a copy of the Environmental Policy statement within the tender pack, tender specification, and should be part of the compliance scoring element of tender marking in procurement.

Once contracted, contractors' environmental compliance should be managed through effective contract management, with Environmental Compliance featuring on the standing contract management agenda.

All aspects of environmental compliance should be discussed at the contract meetings including waste management through to pollution prevention, employee training, environmental incidents, inspections and audit findings.

All environmental compliance communications should be documented and recorded as evidence of contractor environment compliance and improvement.

Please contact the Environmental Compliance Manager for further information.

8. MONITORING AND REPORTING

Near misses and incidents

CHL's definition of non-compliance is "any incident which has the potential to result in a potential breach of legislation or regulatory standard, or which causes a risk to the environment." All non-compliance issues will be reported and escalated as soon as possible, and no later than 24 hours after the incident occurred or becoming aware of it.

Any non-compliance issue identified at an operational level will be formally reported to the Head of Asset Management in the first instance, who will agree an appropriate course of corrective action with the Environmental Compliance Manager and report details of the same to the ELT.

In cases of serious non-compliance, ELT and CHL Board will consider whether it is necessary to disclose the issue to Council, prior to a disclosure to the Regulator or any other relevant organisation such as the Health and Safety Executive.

All environmental near misses and incidents must be reported on the internal reporting system on Entropy.

Trends and root causes will be analysed to ensure effective corrective action which prevents reoccurrence.

Near Miss:	Incident:
Event which happened but did not cause environmental harm or damage.	Event which happened and resulted in environmental harm or damage.

Environmental audit and inspection

CHL undertakes routine announced and unannounced Environmental, Health & Safety compliance audits and inspections across its sites and services, and those of its contractors.

Inspection and audit findings are reported to ELT on a monthly basis, with noncompliance issues flagged with the appropriate manager and remedial actions set.

Please contact the Environmental Compliance Manager for further information.

Key performance indicators

CHL will report comprehensive key performance indicators (KPIs) for environmental management. The Senior Leadership Team will be notified on a monthly basis of the following;

- No. of environmental non-conformities
- No. of environmental incidents and near misses

CHL will report annual data on the following environmental key performance indicators:

Category	Indicator	Metric
Carbon emissions	Scope 1 (gas, oil, fleet fuel)	tCO2e
Carbon emissions	Scope 2 (electricity)	tCO2e
Energy	Electricity consumption	kWh
Energy	Gas consumption	kWh
Energy	Energy Performance Certificates (A-G)	%
Energy	Homes retrofitted for energy efficiency	%
Energy	Homes with renewable technology	%
Water	Total water consumption	M3
Waste	Total waste	tonnes
Waste	Fly-tipping	tonnes
Waste	Total recycling	tonnes

Waste	Total waste to landfill	tonnes
Waste	Waste generated by contractors	tonnes
Travel	Total fleet vehicle mileage	fuel
Travel	Total staff travel	Miles
Biodiversity	Land managed for nature	%
Biodiversity	Total trees managed by CHL	No.
Biodiversity	Herbicide chemicals used	Litres
Biodiversity	Number of sites treated for invasive plants	No.

9. DOCUMENT REVIEW

This document may be reviewed at any time at the request of either staff or management but will automatically be reviewed twelve months from initial approval unless organisational changes, legislation, guidance or non-compliance prompt an earlier review.

Contact us:

Email: info@cornwallhousing.org.uk

Telephone: **0300 1234 161**

By letter: **Cornwall Housing, Chy Trevail, Beacon Technology Park, Bodmin, PL31 2FR**

www.cornwallhousing.org.uk

Alternative formats:

If you would like this information on audio CD, audio tape, Braille, large print, any other format or interpreted in a language other than English, please contact info@cornwallhousing.org.uk

