

DRAFT

POLLUTION PREVENTION MANAGEMENT STANDARD

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1. INTRODUCTION

This standard expands on Cornwall Housing Limited's overarching Environmental Policy Statement and Environmental Management Standard, by outlining specific approaches for preventing pollution.

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.

The key types of pollution have traditionally been classified by the environment in which they occur (air pollution, water pollution, and land pollution) however, modern society is also concerned about specific types of pollutants, such as noise, light, and plastic.

Pollution prevention practices are essential for preventing harmful substances and contaminants from being introduced into the wider environment, safeguarding biodiversity, ecosystems and human health. Uncontrolled pollutants can result in various health complications ranging from respirator conditions to cancer and disrupt important natural processes, contributing to further environmental degradation.

2. SCOPE

This pollution prevention standard applies to all operational activities under the control and influence Cornwall Housing Limited. This includes all associated sites, services, contractors, and suppliers.

In certain situations, additional or expanded pollution prevention arrangements might be required that are applicable to specific sites, assets, or activities. In these cases, bespoke arrangements will be developed and maintained by the relevant business area or operational team.

3. REGULATORY FRAMEWORK

There are numerous pollution related laws in the United Kingdom which aim to protect human health and ecosystems by minimising, eliminating and controlling the release of contaminants into air, water, and soil.

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 some (not all) significant legislation is outlined below;



- **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

- **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

3.2. Environment Agency environmental permits

Any installations, water discharge or groundwater activities, or work on or near a main river or sea defence may require an Environmental Permit from the Environment Agency.

In certain cases, the Environment Agency does not enforce the need for an Environmental Permit if the specific conditions and requirements of a [Regulatory Position Statement](#) (RPS) can be met.



3.3. Local Authority environmental permits

Lower risk ‘installations’ under the Environmental Permitting Regulations are typically regulated by local authorities instead of the Environment Agency. These permits can be for activities at one site or for mobile plant that can be used at many sites.

3.4. Section 61 noise consents

The Control of Pollution Act provides local authorities (Cornwall Council) with powers to control noise and vibration from construction sites and other works. ‘Section 61’ consents allows contractors to agree working hours, site noise levels and other measures prior to long-term construction work starting.

3.5. Trade effluent consents

Anyone who discharges any liquid effluent waste (other than surface water and domestic sewage), into the foul drainage network from premises being used for a business, trade, or industrial process will require formal permission from the local water authority (Southwest Water). Trade effluent can come from both large and small business premises, including activities such as car washes and launderettes.

3.6. Using herbicides near water

Permission is required from the Environment Agency prior to applying an approved herbicide to control weeds, unwanted vegetation and invasive non-native plant species in or close to a water course. This is to ensure that the proposed use of the herbicide does not damage or pollute the aquatic environment.

3.7. Land drainage consent

Both permanent and temporary works which are likely to affect the water flow or capacity of an ‘Ordinary Watercourse’ such as dredging and construction, may require formal permission from the local authority (Cornwall Council).

4. STANDARD PRINCIPALS

Cornwall Housing Limited will apply the following pollution prevention principles to all operational activities under its control and influence, to ensure compliance and industry best practice.



4.1. Risk management

There are three key elements to any type of pollution:

- **Source** Where the pollution originates. Examples include oil spills, litter, or fuel combustion.
- **Pathway:** How the pollution moves or spreads. Examples include rivers, air, or food-chains.
- **Receptor:** What the pollution can impact. Examples include people, places, or wildlife.

To prevent pollution, anyone planning operational activities on behalf of CHL should identify, assess and break potential links between sources, pathways, and receptors.

All employers have a legal duty to eliminate risks to health, safety and environment, as far as is reasonably practicable. Principles of the 'Risk Control Hierarchy' therefore should always be applied when planning operational activities.

This hierarchy ranks options from most to least effective, with risk and hazard removal being the most preferred option:



1. Eliminate

Physically remove the hazard, by avoiding hazardous materials, substances or processes entirely.

2. Substitute

Replace the hazard, by switching to less harmful alternative materials, substances or processes.

3. Engineering Controls

Physically isolate people and the wider environment from hazards, minimising exposure.

4. Administrative Controls

Change the way people work, through appropriate procedures or behavioural training.

5. Protective Equipment

As a last resort, protect workers and the wider environment with specialist measures.

4.2. Overground oil storage

Anyone working on behalf of Cornwall Housing Limited must follow the government's [Oil Storage Regulations for Businesses](#) if a container can hold 201 litres or higher.

Applicable oil storage containers include tanks, drums, intermediate bulk containers (IBCs), mobile containers (bowzers) and certain types of generators.

Applicable oil types include petrol, diesel, biofuels, kerosene, vegetable oils, synthetic oils, biodegradable oils, liquid bitumen-based products, cutting fluids or insulating oils.

The latest government guidance on 'oil storage regulations for businesses' should always be consulted for information on how to store oil, design standards for tanks and containers, where to locate and how to protect them, and capacity of bunds and drip trays.

Failure to follow the 'Oil Storage Regulations for Businesses' could result in enforcement action being taken. The Environment Agency can also serve an anti-pollution works notice to bring any non-compliant oil storage up to legal standards.

Most pollution incidents associated with oil storage are preventable if regular checks are made:

- **Regular Visual Inspections**

All oil containment and associated equipment should be visually inspected on a regular oil basis. The frequency of these visual inspections can be determined by factors such as the age of the storage tank and how often the oil is used.

- **Annual Inspections**

In addition to the regular visual inspections, oil containment should be more thoroughly inspected every year by a competent technician. A record of the inspection should be requested from the technician. Any issues identified should be reported and dealt with promptly.



4.3. Refuelling

When fuels are handled or stored incorrectly, they can pose significant risks to equipment, vehicles, employees, and the wider environment. When undertaking refuelling activities, anyone working on behalf of CHL should consider:

- **Location**
 - Avoid remote refuelling where possible (use main depots and purpose-built fuel stations).
 - Ensure refuelling is undertaken at least 10 metres away from any surface water systems.
 - Store all fuel containers in areas away from possible collision with moving vehicles.
 - Designate specific refuelling areas onsite with impermeable surfaces and isolated drainage (for fixed sites, vehicle refuelling areas will need to be built to specific design standards).
- **Approach**
 - Ensure suitable secondary containment is provided and maintained.
 - Supervise all fuel deliveries and avoid overfilling tanks or containers.
 - Label small fuel containers and store upright with lids securely attached.
 - Lock or secure fuel containers, bowsters and tanks when not in use.
 - Park vehicles and machinery, switching off engines before refuelling.
 - Use a funnel and place a drip tray or absorbent mat under mobile plant.
 - Report and avoid refuelling equipment that appears to be damaged or leaking.
- **Preparedness**
 - Ensure suitable and sufficient oil spill absorbents are available nearby.
 - Remain alert and clear up all minor spillages immediately.

4.4. Solvents

Solvents are substances designed to act on another substance as either a: dissolver, disperser, degreaser, viscosity adjuster, surface tension adjuster, preserver or plasticiser.

Most solvents are hazardous substances. Even in small quantities they cause pollution and can seriously impact the quality of groundwater making it unfit for drinking water or other uses such as food production.





Anyone using or storing solvents on behalf of Cornwall Housing Limited must follow the government's groundwater protection code of practice:

[Prevent groundwater pollution from solvents - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/prevent-groundwater-pollution-from-solvents)

Discharging solvents directly to groundwater or disposing of solvents on land without a permit from the Environment Agency is illegal and could result in imprisonment or an unlimited fine.

4.5. Pesticides

Chemical mixtures used to kill weeds and treat invasive non-native plants (INNS) can be referred to as: plant protection products, which include herbicides, insecticides and fungicides. These products can carry significant risks and must be carefully managed in ways that prevent harm to people and the environment.

Only qualified individuals who hold an appropriate certificate of competence, such as spraying certificate or a pesticide licence can use professional pesticides. Formal permission is additionally required from the Environment Agency to use approved herbicides in or near to a water course and/or Natural England when near or within a Site of Special Scientific Interest (SSSI) or Special Area of Conservation (SAC).

1. Mechanical Methods:

Manual removal, cutting, hoeing, mechanical brushes, weed burners and hot foam.

2. Horticultural Methods:

Mulching, weed growth barriers and planting ground covering plants.

3. Biological Methods:

Living organism for example biological control agents.

4. Chemical Methods:

Foliar contact, systemic herbicides and insecticides. Selective and non-selective herbicides (including products containing glyphosate). Acetic acids.

Other considerations include:

- Ensuring the most appropriate product is selected for the plant species being targeted.
- Local environment (for example: proximity to drainage systems and protected or sensitive areas).
- Impact on people (for example: proximity to schools or play areas).

Anyone purchasing, storing, transporting and using pesticides on behalf of Cornwall Housing Limited must do so in accordance with the Plant Protection Products Regulations. They should also ideally be [BASIS](#) registered - this organisation establishes professional standards for the safe storage and transport of agricultural and horticultural pesticides, providing a recognised means for assessing the competence of individuals and companies working within this sector.



Further information on this topic can be found on the Health & Safety Executive's website:

[Pesticides - HSE](#)

4.6. Secondary containment

Secondary containment must be installed around containers to catch oil or chemicals that leak. Secondary containment is usually either: 1.) a drip tray beneath the container, or 2.) a bund (an outer case which holds the container). Fixed tanks should be banded. Other containers can be banded or use drip trays.

Secondary containment does not include: 'double-skinned' or 'twin-walled tanks' (where the tank is surrounded by a second outer skin for extra strength), or oil separator/interceptor drains.

Bands must hold 110% of the capacity of the container. Where there is no bund, secondary containment should be checked to ensure it has the required capacity:

- **Oil Drums**

The secondary containment for an oil drum (usually a drip tray) should have a capacity equal to or more than 25% of the drum it is holding. If the drip tray can hold more than one drum, it should be able to hold one quarter of the combined capacity of the drums it can hold.

- **Single Containers**

For fixed tanks, mobile bowsters, IBCs and other single containers, the secondary containment should have capacity to hold 110% of the capacity of the container.

- **Multiple Containers**

Secondary containment that contains multiple fixed tanks, mobile bowsters or IBCs, should have a capacity that is equal to whichever is the greater of these two measurements: 1.) one quarter (25%) of the combined capacity of all the containers, or 2.) 110% of the capacity of the largest container.

- **Linked Containers:**

If the containers are hydraulically linked, they should be treated as a single container, so the secondary containment has a capacity of 110% of the combined capacity. If the containers are hydraulically linked, but have separate secondary containment, each separate secondary bund or drip tray should have a capacity of at least 110% of the combined capacity of all the containers. If the secondary drip trays or bunds are hydraulically linked together, the combined capacity of the bunds or drip trays can be counted together.

- **Bund Design Requirements:**

Bunds can either be: 1.) manufactured as part of a tank system (as known as 'pre-bunded' or 'integrally bundled' tanks), or 2.) constructed from masonry or concrete.

For bunds of either variety, it is important to ensure:

- The bund is impermeable (substances cannot pass through).
- The base or walls of the bund do not have a pipe, valve or opening that allows the bund to be drained.
- Any fill pipe or draw-off pipe that passes through the bund base or wall is sealed.
- The bund contains every part of the container and its associated equipment (such as valves), unless the oil being stored has a flash point of less than 32°C (such as ethanol), in which case filters, sight gauges, valves and other equipment can sit outside the bund.

Bunds constructed from masonry and concrete are likely to need a rendering or coating on the internal surfaces of the base and walls to make them impermeable. Bunds should therefore be inspected for integrity by a qualified engineer at least every three years.

The Construction Research and Information Association (CIRIA) has published [advice](#) on how to construct bunds that meet these requirements.



4.7. Drainage systems

There are two main categories of drainage systems, and both can act as a pathway for pollution:

- **Surface Water Systems**

- Denoted by blue coloured drain covers.
- Discharges straight into the natural environment, usually untreated.
- Regulated by the Environment Agency.

- **Foul Sewer Systems**

- Denoted by red coloured drain covers.
- Discharges to sewage network, storage lagoons or treatment systems.
- Regulated by the Local Water Authority (South West Water).

Anyone working on behalf of Cornwall Housing Limited should ensure that:

- Surface water drains carry only uncontaminated water.
- Site effluent and contaminated surface waters are discharged to the foul drain.
- Oil interceptors and sediment traps are installed and maintained.
- All drains are clearly marked on plans that are available to staff
- All drains are accessible for inspection and maintenance activities.
- All drains are routinely cleared of debris and kept free from blockages.

In the event of polluting substances entering either surface or foul drainage systems, the Environmental Compliance Manager must be notified as soon as possible, as the Environment Agency or South West Water will likely need to be informed.

4.8. Oil Interceptors

These purpose-built drains and tanks trap oil and fuel, preventing contaminated water from reaching the wider environment. They are typically required where there are hard surfaces and a risk of oil or fuel contaminated run-off seeping into surrounding waterways or the ground.

Over time, oil and debris builds up in oil interceptors, preventing them from working. Regular maintenance is therefore essential to ensure that an interceptor is always fully functional. Interceptor sludge should always be classified and handled as a hazardous waste type.



It is important to note the following:

- Oil interceptors are not considered 'secondary containment'.
- Oil interceptors do not work if there is detergent in the water (for example: vehicle washing)
- Oil Interceptors do not trap anything non-oil based (for example: chemicals and sediments).

4.9. Drainage plans

Fixed operating premisses and major infrastructure sites should keep an up-to-date plan of site drainage.

Site drainage plans should mark foul drains in red, surface water drains in blue and the direction of flow for both surface and foul drains (using the same colours to mark drain covers and manholes).

Site drainage plans should outline:

- The general layout of buildings and roads on the site.
- Any interceptors, sumps, and soakaways on or near the site.
- Discharge points for surface water and trade effluent.
- Watercourses, boreholes, or wells on or near the site.
- Any inspection points and retention ponds.

Site drainage plans should show also ideally highlight:

- Sprinkler control valves (where applicable) and mains water stopcocks.
- Places around the site suitable for portable emergency storage.
- Points where you can use bungs and plugs.
- Process areas and any treatment areas on the site for trade or domestic sewage.
- Fire hydrants, fireboxes, cut-off valves and spill kits.
- Bunded areas, indicating their capacity and the types of products stored in them.

4.10. Water discharge

Water discharge permissions must be in place prior to any new activities commencing and regular water quality testing should be arranged to ensure compliance with the specific



parameters and conditions outlined with the permit or consent. For further information on sampling and testing.

There are two main types of legal water discharge permissions:

- **Environmental Permits:**
 - For discharging effluent into surface or ground water systems.
 - Regulated by the Environment Agency.
- **Trade Effluent Consents:**
 - For discharging effluent into the foul sewer system.
 - Regulated by the local water authority (South West Water).

Environment Agency Public Register



Search environment permits for surface and ground water discharge activities.

4.11. Working near water

Operational activities within or near water have the potential to cause flooding and/or significant pollution. As a result, many of these operational activities require authorisation.

CHL intranet Mapping System



Turn on various layers, to determine if operational activities are going to affect a 'Main River' ([Flood Risk Permit or Exemption](#)), 'Ordinary Watercourse' ([Land Drainage Consent](#)) or are below the mean high-tide level ([Marine Licence](#)).

Where possible, anyone working in or near water on behalf of Cornwall Housing Limited should aim to hire machinery or equipment containing biodegradable hydraulic oil, to reduce the impact of pollution should a mechanical failure or incident occur.

Anyone working within or near water on behalf of Cornwall Housing Limited should:

- Reduce or eliminate the need to work within a waterbody.
- Undertake the work in a way that avoids restricting or blocking flows.
- Undertake the work in a way that avoids contamination from occurring.
- Carefully follow all conditions outlined within regulatory permissions.
- Store all fuel, materials, and waste at least 10 metres away from the watercourse.
- Ensure controls are in place prior to starting work and continually evaluate effectiveness.
- Monitor and assess water quality throughout the work to ensure that pollution is not occurring.

4.12. Concrete & cement

Concrete and cement can be very damaging to the environment, having devastating impacts on aquatic wildlife if allowed to enter watercourses in an uncontrolled manner. This is because concrete contains harmful additives and cement is highly alkaline (corrosive).

Anyone working on behalf of Cornwall Housing Limited should:

- Be aware of all watercourses and drain locations before starting work.
- Ensure watercourses and drains are fully protected from any concreting works and washout.
- Store bagged cement and concrete at least 10 metres away from watercourses and drains.
- Undertake all mixing or batching work at least 10 metres from watercourses and drains.
- Setup designated areas for concrete washout and ensure others know where these are located.

4.13. Silt & mud

Silt is the term used for very fine soil, clay or other sediment carried by running water. It can easily be caused by rainwater running off exposed or disturbed areas of ground, pumping and dewatering of excavations or clearing ditches and drains, discolouring watercourses for significant distances downstream and having detrimental impacts on aquatic wildlife.



Anyone working on behalf of Cornwall Housing Limited should consider:

- **Planning**

- Ensure that exposed ground and excavations are kept to a minimum.
- Work in phases to limit large amounts of excavation or exposed ground at any one time.
- Check weather forecasts when planning work, avoiding soil excavation in excessively wet weather.
- Ensure permission to discharge has been granted by the Environment Agency.
- Prevent water from becoming contaminated in the first place by minimising unnecessary mixing.
- Identify the drains and watercourses where surface run-off is likely to flow towards.
- Ensure relevant permissions are obtained to treat water with flocculant products.

- **Operations:**

- Ensure stockpiles are kept at least 10 metres away from watercourses or drains.
- Ensure stockpiles, banks and excavations are stabilised where possible.
- Use straw bales, silt fencing, silt mats or other sediment-catching objects as filters where possible.
- Use barriers, ditches, sediment traps or settlement ponds to redirect or contain silty water.
- Regularly check for discoloured water and stop work if pollution is occurring.

4.14. Firewater

Significant pollution can occur when water used for fighting fires has been allowed to reach nearby rivers or watercourses. Firefighting run-off can become contaminated by materials on site, their combustion, the use of firefighting foams or powders, or a combination of these things.

When developing a fire risk assessment or emergency plan, anyone working on behalf of Cornwall Housing Limited should consider and detail any actions associated with controlling firefighting run-off.



Further information on this topic can be found at:

[Prevent pollution from firefighting - Environmental guidance for your business](#)

4.15. Sewage (Wastewater)

Properties that are not connected to the foul sewer system will require a permit or exemption from the Environment Agency to discharge into the environment from a treatment plant, cesspit or septic tank.

Closed sewage storage systems that do not discharge, will need to be regularly emptied by an appropriate licensed waste carrier.

Properties that are connected to the foul sewer system do not need an environmental permit from the Environment Agency but any [new sewer connections](#) will still require consent from the Local Water Authority (South West Water).

4.16. Dust & air quality

Poor air quality is the largest environmental risk to public health in the UK. Whilst air quality in Cornwall is generally very good, there are still certain 'hotspots' where standards fail to meet national air quality objectives. Air Quality Management Areas (AQMAs) have been declared in these particularly sensitive areas.

Cornwall Council Mapping System



Click layers, and then pollution, to turn on Air Quality Management Areas (AQMAs), to determine if operational activities are going to be within a sensitive area.

In addition to health concerns and public nuisance, dust and other particulate from operations can be picked up by the wind, causing damage to vegetation and negatively impacting wildlife and watercourses.

Certain installations, combustion plant and generators that have the potential to generate or release substantial particulate into the atmosphere may require an Environmental Permit with either the Environment Agency or Local Authority.

Any dust, odour and other atmospheric emissions arising from activities on the site must be minimised.

Local Authorities have specific duties and responsibilities regarding air quality and dust that causes a statutory nuisance.

It is an offence to dispose of any commercial/industrial waste by burning, unless carried out under an environmental permit, waste exemption or statutory plant health notice instructions.

Anyone working on behalf of Cornwall Housing Limited should consider:

- **Planning**

- Determine whether work will be taking place within an Air Quality Management Area.
- Carefully follow all conditions and requirements outlined within environmental permits.
- Ensure controls are in place prior to starting work and continually evaluate effectiveness.

Operations

- Ensure cutting and grinding operations are adequately shielded or dampened.
- Keep surfaces swept and dampen down with water at regular intervals during dry weather.
- Store fine dry materials within buildings or provide adequate protection from the wind.
- Monitor and assess dust and smoke throughout the work to ensure that pollution is not occurring.
- Keep to site speed limits to minimise dust generation.
- Turn engines off when not in use and ensure regular maintenance and servicing.
- Minimise drop heights into haulage vehicles and cover over lorries carrying dry materials.



Further information on this topic can be found on Cornwall Council's website:

[Air Quality - Cornwall Council](#)

4.17. Fluorinated gases

Many refrigeration, air conditioning and heat pump systems contain harmful fluorinated greenhouse gas such as hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulphur hexafluoride (SF₆). These 'F Gasses' can have a global warming potential 25,000 higher than carbon dioxide and are strictly controlled.

The F gas regulations require equipment which contains a certain amount of F gas to be tested for leaks on a frequent basis. It is still important for any refrigeration, air conditioning and heat pump systems to be regularly serviced and maintained. A maintenance contract should be set up for each system which covers unexpected breakdowns and annual servicing.

The F gas regulations require owners and operators of equipment to:

- Prevent leakage and repair any leaks as soon as possible.
- Arrange refrigerant recovery by certified personnel during servicing and disposal.
- Undertake leak checks, ensuring that only certified competent personnel carry out these checks.
- Maintain records of refrigerants and of air conditioning maintenance visits.

The frequency of leak checks depends on the amount of F gas in the equipment and the global warming potential of the F gas (how much it contributes to global warming).

Responsibility for stopping leaks from equipment is shared between:

- Users of equipment containing F gas.
- Service technicians who install, maintain or dispose of the equipment.

Anyone who services equipment, must:

- Have qualifications and company certification to work with F gas.
- Check certain F gas equipment for leaks.
- Record F gas in certain equipment that is owned or serviced.
- Recover, reclaim or recycle F gas.
- Follow rules for operating and servicing high voltage switchgear containing SF6.

Further information on this topic can be found on the government's website:



- [Checking F gas equipment for leaks - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/checking-f-gas-equipment-for-leaks)
- [Fluorinated gas \(F gas\): guidance for users, producers and traders - GOV.UK](https://www.gov.uk/guidance/fluorinated-gas-f-gas-guidance-for-users-producers-and-traders)

4.18. Noise pollution

In addition to disturbing wildlife, noise pollution is one of the statutory nuisances that can be investigated by Local Authorities (Cornwall Council). Noise from a large industrial installations and waste facilities may be controlled by the Environment Agency through conditions within Environmental Permits.

Anyone working on behalf of Cornwall Housing Limited should act with consideration for all those who live and work in the area surrounding construction sites, to minimise their inconvenience. Positive relations with neighbours can avoid complaints and reputational damage.

Anyone working on behalf of Cornwall Housing Limited should consider:

- **Planning**
 - Adhere to working hours and restrict noisy activities to agreed times of the day.
 - Arrange delivery routes and times to minimise potential nuisance.
 - Minimise vehicle and plant reversing alarms by arranging one-way systems.
 - Hire quieter electrically powered plant and machinery wherever possible.
 - Locate fixed noise sources away from sensitive receptors, where possible.
 - Keep local residents informed in advance of any unavoidably noisy operations.
 - Consider registering the project with the Considerate Constructors Scheme (CSS).
- **Operations**
 - Keep acoustic doors, hoods and panels on machinery and generators closed.
 - Use screening and barriers where necessary.
 - Ensure the effectiveness of controls is continually evaluated.
 - Monitor and assess noise where appropriate.
 - Turn engines off when not in use and ensure regular maintenance and servicing.
 - Minimise the drop heights when loading and unloading.

- **Section 61 Consents**

Anyone working on behalf of Cornwall Housing Limited should apply for a 'Section 61' consent from the local authority for long-term construction projects, or when undertaking works at night or outside of normal working hours.

Section 61 of the Control of Pollution Act allows contractors to agree working hours, site noise levels and other measures prior to work starting.





Further information on this topic can be found on Cornwall Council's website:

[Noise Pollution - Cornwall Council](#)

4.19. Light pollution

Artificial light has the potential to become 'light pollution' or 'obtrusive light'. It can be a source of annoyance to people, disturb wildlife and undermine enjoyment of the countryside or the night sky, especially in areas with dark landscapes.

Changes in legislation brought in by the Clean Neighbourhoods and Environment Act mean that the definition of nuisance has now been extended to include light pollution as a potential statutory nuisance.

Anyone working on behalf of Cornwall housing Limited must use artificial lighting responsibly with consideration to local circumstances, and should consider the following:

Where the light shines Angle them from neighbouring windows and wildlife habitats.

When the light shines Turn lights off when not in use and between certain hours.

How much light shines Use lower powered bulbs where possible.



Further information on this topic can be found at:

- [Light Pollution - GOV.UK](#)
- [Light Pollution - Cornwall Council](#)

4.20. Contaminated land

Land that has been previously worked on or used by industrial processes is known as a brownfield site. This land may be contaminated with substances that are harmful to humans, wildlife or the surrounding environment.

These contaminants could be present in solid form like asbestos or tar residues, in liquid form like oils or solvents, or as a gas like methane.

Anyone working on behalf of Cornwall Housing Limited should remain vigilant when working on brownfield land as harmful contaminated material could be discovered unexpectedly.

Anyone working on suspected contaminated land on behalf of Cornwall housing Limited should:

- Arrange for surveys and laboratory testing prior to any work activities commencing.
- Avoid excavating or disturbing hazardous material where possible to prevent pollution.
- Remain vigilant for changes in the colour, texture, odour, or fumes of excavated materials.
- Prevent the spread of contamination by dampening down dust and controlling runoff.



Further information on this topic can be found on Cornwall Council's website:

[Contaminated Land - Cornwall Council](#)

4.21. Emergency preparedness

Anyone working on behalf of Cornwall Housing Limited should establish, implement and maintain the processes needed to prepare for and respond to potential emergency situations, by:

- Planning response actions that prevent or mitigate adverse environmental impacts.
- Taking action (where safe) to prevent or mitigate the consequences of emergency situations.
- Periodically testing the planned emergency response actions (where practical).
- Periodically reviewing emergency preparedness and revising planned response actions.
- Providing information and training related to emergency preparedness and response.

It is important to ensure the appropriate type and quantity of spill absorbents are readily available and that staff and contractors are trained in their use:

- **White Coloured Absorbents (Oil Only)**
 - For oil-based liquids (including fuels) on land or water.



- Repels water and floats even when saturated with oil.
- **Yellow Coloured Absorbents (Chemical)**
 - For aggressive liquids, like acids and alkalis.
 - Can be safely used for water or oil-based fluids.
 - Absorbs rainwater and does not float.
- **Grey Coloured Absorbents (General Use)**
 - For non-aggressive liquids and mild chemicals.
 - Can be safely used for water or oil-based fluids.
 - For indoor use (absorbs rainwater and does not float).

Once spill absorbents are used, they are likely to be considered hazardous waste and should be disposed of accordingly (see Waste Management Standard for further information).

All pollution incidents and near misses must be recorded on the Entropy reporting system. Incident trends and root causes will be analysed to ensure effective corrective action is implemented which prevents reoccurrence.



Urgent pollution incidents can be reported on the Environment Agency's 24-hr hotline: 0800 80 70 60.

5. ROLES AND RESPONSIBILITIES

Anyone working on behalf of Cornwall Housing Limited has a duty to prevent pollution in accordance with the principles of this standard. 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 prevent pollution in accordance with legislation and industry best practice.
- **Environmental Compliance Manager**
 - Providing technical support on pollution prevention matters.
 - 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

Cornwall Housing Limited is committed to developing, maintaining, and deploying competent personnel to support its pollution prevention activities. Specific requirements are determined by each business area, however some of the key training and competency expectations are summarised below:

- **All Employees**

Will receive general awareness of pollution, nuisance and spill response as part of induction processes. Regular briefings will be provided, and where relevant, additional specific training will be undertaken.

- **Environmental Operatives**

Will possess and retain the appropriate certificates of competence for spraying pesticides products.

- **Surveyors, Supervisors & Managers**

Will be supported (where appropriate) to undertake specific certified pollution related training courses.

- **Environmental Specialists**

Will possess and retain appropriate technical competency qualifications and professional memberships.

7. INTERESTED PARTIES

Key regulatory bodies for pollution include:

- **Environment Agency (EA)**

This executive non-departmental public body, sponsored by the Department for Environment, Food & Rural Affairs (DEFRA) has responsibility for regulating most flood risk, waste management and pollution related activities (including oil storage and water discharge).

- **South West Water (SWW)**

Water companies have statutory duties to supply drinking water and waste water services to their customers and to ensure effective drainage within their areas.

- **Local Authority (Cornwall Council)**

In addition to overseeing 'Land Drainage Consents' for activities impacting 'ordinary watercourses', local authorities also have statutory duties for ensuring that noise, dust, odour, and litter is controlled.

- **Health and Safety Executive (HSE)**

This national regulator for workplace health and safety is responsible for protecting people and improving the performance of industry, to reduce work-related accidents and occupational ill-health. This extends not only to employees, but also to members of the



public whose may be affected by pollution.

- **Maritime & Coastguard Agency (MCA)**

The agency is the UK's authority responsible for the provision of response procedures designed to deal with any emergency at sea that threatens or causes actual pollution.

- **Marine Management Organisation (MMO)**

This executive non-departmental public body, sponsored by the Department for Environment, Food & Rural Affairs (DEFRA) has responsibility for clean, healthy, safe, productive, and biologically diverse oceans and seas, regulating activities below the mean high-water line.

Other interested parties may potentially include: Contractors, Suppliers, Residents and Landowners.

8. MONITORING AND REVIEW

This standard will be regularly reviewed and periodically audited to ensure its ongoing relevance and effectiveness.

8.1. Key performance indicators

Cornwall Housing Limited will monitor pollution performance annually, using the following key indicators:

- Herbicide chemicals used (litres)
- Nuisance related public complaints
- Number of staff members trained in pollution response
- Pollution near misses and incidents (by business area, root cause and severity)
- Environmental inspections and audits (by business area, raised findings and scores issued)

8.2. Near misses & incidents

All pollution related near misses and incidents must be recorded on the internal HSEQ Entropy reporting system.

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



| Near Miss: | Incident: |
|---|---|
| <p>Event which happened but did not cause environmental harm or damage.</p> <p>Pollution example: Oil drum knocked over by vehicle, but nothing spilt or leaked</p> | <p>Event which happened and resulted in environmental harm or damage.</p> <p>Pollution example: Oil drum knocked over by vehicle and contents spilt into drain.</p> |

8.3. Audits & inspections

Documented internal audits and inspections of activities will be undertaken by the environmental compliance team, operational managers, and site supervisors. All business areas will be reviewed at least annually, with additional oversight for higher risk activities or locations.

Regular third-party audits will additionally take place of licensed activities.

Cornwall Housing Limited reserves the right to undertake audits of external contractors to ensure services are compliant and being undertaken in accordance with agreed standards and performance expectations.

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.

10. APPENDIX – GUIDANCE ADVICE NOTE THE FOLLOWING GUIDANCE ADVICE NOTES ARE AVAILABLE TO CORNWALL HOUSING EMPLOYEES THROUGH SHAREPOINT.

- [Cleaning machinery](#)
- [Dewatering excavations](#)
- [Drainage jetting](#)
- [Dust and air quality](#)
- [Fuel oil](#)
- [Noise vibration](#)
- [Public nuisance](#)

