By Appointment to
His Majesty King Charles III
Building Conservation Services
SSH Conservation Ltd
Somerset

SSH CONSERVATION
HISTORIC BUILDING & MONUMENT CONSERVATION

Environmental Policy

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1. Policy Statement

SSH Conservation Ltd is a specialist building and monument conservation contractor. Our work is carried out almost entirely on historic fabric — listed buildings, scheduled monuments, churches, churchyards and designed landscapes — and frequently in ecologically and archaeologically sensitive settings. We are committed to conducting that work in a manner that protects the environment, prevents pollution, and supports sustainable development.

We recognise that our activities have environmental impacts, that those impacts are not all of equal significance, and that a policy is only useful if it identifies the impacts that genuinely matter to our business and states how each is controlled. Section 4 of this policy does that.

We also recognise the environmental benefit inherent in what we do. Conservative repair extends the service life of existing building fabric and avoids the far greater embodied carbon, waste and resource consumption of demolition and replacement. Sustaining that benefit through the correct technical approach — repair in preference to renewal, like-for-like materials, minimum intervention — is itself an environmental objective, not only a conservation one.

This policy is approved by the Managing Director, is appropriate to the nature and scale of our activities, and provides the framework within which environmental objectives are set and reviewed.

2. Scope and Application

This policy applies to all activities undertaken by SSH Conservation Ltd, whether as main contractor or as a specialist subcontractor, and to all locations under our control: project sites, our stonemasonry workshop and yard at The Forge, Over Stratton, our office, and the company vehicles and plant operated on company business.

It applies to the Managing Director, any employees, and everyone working under the Company's direction, including labour-only subcontractors, and to specialist subcontractors, suppliers and visitors working on our behalf. Where we work as a subcontractor within a principal contractor's site, we comply with this policy and

with the principal contractor's environmental management arrangements, adopting the more demanding requirement where the two differ.

3. Legal and Other Requirements

We comply with all applicable UK environmental legislation, regulations and codes of practice. Those most relevant to our operations include:

- Environmental Protection Act 1990 — waste duty of care, statutory nuisance
- Environment Act 2021 — environmental governance, air quality, waste and biodiversity duties
- Climate Change Act 2008 — carbon reduction and net zero
- The Waste (England and Wales) Regulations 2011 — waste hierarchy and segregation
- Hazardous Waste (England and Wales) Regulations 2005 — consignment and disposal of hazardous streams
- Control of Pollution (Amendment) Act 1989 — registered waste carriers
- Environmental Permitting (England and Wales) Regulations 2016 and Water Resources Act 1991 — discharges to surface water, groundwater and controlled waters
- Control of Pollution Act 1974, sections 60 and 61 — construction noise
- Clean Air Act 1993 — emissions, dark smoke and prohibition of open burning
- Control of Substances Hazardous to Health Regulations 2002 — biocides, solvents, consolidants, respirable crystalline silica
- Control of Asbestos Regulations 2012 and Control of Lead at Work Regulations 2002 — hazardous materials in historic fabric
- Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 — bats, nesting birds and other protected species
- Planning (Listed Buildings and Conservation Areas) Act 1990 and Ancient Monuments and Archaeological Areas Act 1979 — consents governing intervention in historic fabric
- Greater London Authority Non-Road Mobile Machinery (NRMM) Low Emission Zone requirements, and equivalent local requirements, where applicable

Changes to environmental legislation are monitored by the Managing Director with support from BSG (Building Safety Group), our external health and safety adviser, and are reflected in this policy, in our risk assessments and method statements (RAMS), and in site briefings.

4. Significant Environmental Aspects and How They Are Managed

The following are the environmental impacts for which our business is most significantly responsible, listed in order of assessed materiality, together with the arrangements by which each is controlled. Aspects are reassessed annually and whenever we take on work of a materially different type or scale.

4.1 Transport fuel and business travel — our largest impact

Impact. Our workforce and materials travel to dispersed heritage sites across the UK. Diesel burned in our two company vehicles and in owned and hired plant is our principal direct (Scope 1) emission; subcontracted haulage, courier movements, plant deliveries and workers' travel and accommodation form the largest part of our indirect (Scope 3) footprint.

How it is managed.

- Journeys are planned at the pre-start stage to consolidate deliveries and site visits, and to avoid repeat trips for materials that could have been scheduled together.

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- Local labour and local suppliers are used wherever the specification and available skills allow, reducing both travel distance and accommodation nights.
- Car sharing is encouraged and coordinated between operatives working on the same site; public transport is used for site visits and meetings where practicable.
- Vehicles are maintained in accordance with manufacturers' schedules, with tyre pressures and servicing kept current to preserve fuel efficiency; idling on site is not permitted.
- Fuel card and mileage records are collected to allow fuel consumption to be measured and reported, and to establish a baseline against which reduction targets can be set.
- Vehicle replacement decisions take emissions performance into account, and the practicality of lower-emission vehicles is reviewed at each renewal.
- The Company operates two company vehicles: one owned by SSH Conservation Ltd and one currently owned by Maylim Limited, which is expected to transfer to the Company.
- The Company owns specialist plant, including a Thermatech cleaning unit, gantries and generators, which is maintained and kept in service for as long as practicable; other plant is hired in as needed, avoiding the purchase of equipment that would be under-used.
- Site meetings are held remotely where doing so does not compromise inspection of the works.

4.2 Materials, embodied carbon and responsible procurement

Impact. Natural stone, lime binders, sand and aggregate, cement where specified, stainless steel and resin anchors, consolidants and biocides all carry extraction, processing and transport impacts. Quarrying causes land disturbance; calcination of lime and cement is energy-intensive.

How it is managed.

- Repair is specified in preference to replacement wherever the fabric permits, consistent with conservation principles and with minimising new material use.
- Lime mortars and traditional materials are used in preference to cement wherever technically appropriate; lime is produced at lower kiln temperatures than cement and reabsorbs carbon dioxide as it carbonates over its service life.
- Stone is sourced to match the original geology, from UK quarries wherever a suitable match exists, reducing transport impact relative to imported alternatives.
- Materials are ordered to measured quantities against take-offs, and stored under cover and off the ground to prevent spoilage of lime, sand and stone.
- Timber is FSC-certified.
- Materials are selected with minimal plastic content and packaging, and suppliers who accept the return of pallets, drums and packaging for reuse are preferred.
- Surplus stone, lime, aggregate and timber is retained and redeployed across projects rather than disposed of.
- Subcontractors are asked for their Environmental Policy at prequalification, and environmental performance forms part of our subcontractor assessment.

4.3 Water use and water pollution

Impact. This is our highest-consequence pollution risk. Cleaning of historic masonry — nebulous spray, superheated water systems, poulticing, controlled washing and paint removal — consumes water and generates runoff that may carry alkaline lime fines, spent poultice material, biocide residues, paint and coating residues, and metals mobilised from historic fabric. Much of our work adjoins churchyards, surface water drains, soakaways and watercourses, where uncontrolled runoff can cause a pollution incident and an offence.

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How it is managed.

- A drainage and runoff assessment is completed for every project involving wet cleaning or chemical application, identifying surface water drains, gullies, soakaways, wells and watercourses within the affected area before work starts.
- Drains and gullies within the working area are covered, sealed or protected; where necessary, runoff is contained by bunding, sheeting, gutters and collection trays.
- Arisings from cleaning are collected, settled and filtered rather than allowed to discharge to ground or drain; settled solids are removed as controlled waste.
- Where a discharge to foul sewer or controlled waters is unavoidable, the consent of the sewerage undertaker or the Environment Agency (Natural Resources Wales for work in Wales) is obtained in advance and its conditions are complied with.
- Nebulous and misting systems are specified in preference to high-volume washing, and timers and controls are used to limit water use to the minimum effective duration.
- Biocide use is minimised, applied only where technically justified, at the lowest effective concentration, by trained operatives, in accordance with the product COSHH assessment and never in conditions where drift or runoff to sensitive receptors is likely.
- Hoses, standpipes and tanks are checked daily for leaks; abstraction from any source other than a metered mains supply is only undertaken with the necessary authorisation.
- Spill kits appropriate to the substances in use are held on every site and their location is covered at induction.

4.4 Waste, including hazardous waste

Impact. Stone offcuts, masonry dust and slurry, spent poultice, redundant mortar and lime arisings, packaging and sheeting. Hazardous streams arise from asbestos and lead paint encountered in historic fabric, lead flashings, resins, solvents and biocide containers.

How it is managed.

- We apply the waste hierarchy — prevent, reuse, recycle, recover, dispose — from the estimating stage onward, with quantities ordered to take-off to prevent waste at source.
- Waste is segregated on site into rubble and stone, timber, metals, mortar and lime, chemicals, cardboard and paper, and general waste; mixed skips are avoided wherever site space allows.
- Sound stone, timber, lime and aggregate are reused on the project or transferred to other projects; historic fabric removed from site is retained or returned to the client where it has conservation or archaeological value.
- Asbestos and lead-based coatings are presumed present in historic fabric until surveyed; where identified, they are removed by appropriately licensed or trained contractors and consigned as hazardous waste.
- All controlled waste is removed only by registered waste carriers to permitted facilities, with waste transfer notes and hazardous waste consignment notes obtained, checked and retained for the statutory period.
- No waste is burned on site under any circumstances, and no waste is buried, tipped or left in churchyards or on historic ground.
- PPE waste is reduced through reusable masks, gloves and eye protection and through take-back recycling schemes; office paper and canteen waste are segregated and recycled.

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4.5 Dust, emissions and local air quality

Impact. Cutting, grinding and abrasive cleaning generate respirable crystalline silica and visible dust; air-abrasive systems generate spent media; solvents, paint removers and consolidants release volatile organic compounds; generators and non-road mobile machinery emit exhaust pollutants, often in urban conservation areas.

How it is managed.

- Cutting and grinding are carried out with on-tool water suppression or on-tool extraction (M-class), with hand tools and hand-cut techniques preferred where the conservation approach allows.
- Working areas are sheeted and, where necessary, fully encapsulated to prevent dust migration beyond the site boundary; sheeting is monitored and repaired.
- Abrasive cleaning is used only where justified by trials and approved by the contract administrator, at the lowest effective pressure, with media collected and disposed of as controlled waste.
- Low-VOC and water-based products are specified wherever an effective alternative to a solvent-based product exists; solvents are decanted and applied in controlled quantities with containers kept closed.
- Mains power is used in preference to generators wherever a supply can be obtained; where generators are necessary they are correctly sized, maintained, and switched off when not in use.
- Plant used within the Greater London NRMM Low Emission Zone, or equivalent local schemes, meets the applicable emission standard and is registered as required.
- Dust and emission controls are set out in the project RAMS and briefed at induction; complaints from neighbours are recorded and acted upon.

4.6 Biodiversity and protected species on historic fabric

Impact. Our sites are ecologically significant precisely because they are old. Bat roosts in roof voids, towers and masonry joints; nesting birds including swifts, swallows, peregrines and barn owls; and rare lichen, moss and bryophyte assemblages on monuments, gravestones, rubble walling and boundary structures are all directly at risk from access works, cleaning, mortar removal and biocide application. Several are legally protected, and damage or disturbance is a criminal offence. Scaffold, compounds and material storage can also compact ground and damage roots of veteran trees in churchyards and designed landscapes.

How it is managed.

- Ecological constraints are identified at pre-construction stage. Where bats, nesting birds or notable lichen assemblages are known or suspected, we require confirmation that an ecological survey has been undertaken and we work to the resulting method statement and any licence conditions.
- Work is not started or continued in any area where a bat roost or active nest is identified until the position has been resolved with the client's ecologist and, where required, Natural England (Natural Resources Wales for work in Wales); suspected roosts or nests found during work trigger an immediate stop in that area and a report to the lead operative nominated for the project.
- Timing of external works is planned around the bird nesting season and bat activity periods wherever the programme allows.
- Cleaning and biocide specifications are reviewed for their effect on lichen and bryophyte communities on monuments and memorials; where significant assemblages are present, areas are excluded from cleaning, or a gentler method is agreed with the contract administrator, rather than treated by default.
- Scaffold bases, access routes, compounds and material storage are located to avoid root protection areas of trees and to avoid ground disturbance in churchyards and archaeologically sensitive ground; ground protection is used where compaction is a risk.

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- Ecological requirements are briefed at site induction and reinforced by toolbox talk, so that operatives working directly on the fabric know what to look for and what to do if they find it.

4.7 Energy in workshop, office and site welfare

Impact. Electricity and fuel used by the stonemasonry workshop and yard (saws, compressors, lifting equipment, lighting), the office, and site welfare and temporary accommodation. Modest in absolute terms relative to transport and materials, but directly within our control.

How it is managed.

- Eco welfare units are used on site in preference to conventionally powered units, with solar power used where available.
- Heating and lighting in the workshop, office and welfare units are controlled to occupied hours; LED lighting is fitted on replacement.
- Plant and equipment are switched off rather than left idling or on standby, and this is included in site briefings.
- Energy consumption at the workshop and office is monitored through supplier billing data to establish a baseline for reduction.

4.8 Noise, vibration and amenity

Impact. Percussive tools, saws, compressors and generators operating in conservation areas, places of worship, residential settings and public spaces, where the surrounding community is close and often uninvolved in the works.

How it is managed.

- Working hours are agreed with the client and local authority, and where required a prior consent under section 61 of the Control of Pollution Act 1974 is obtained.
- The quietest practicable method and equipment are selected, with hand techniques and low-vibration tools preferred where the conservation approach allows; acoustic screening is used where necessary.
- Noisy operations are scheduled to avoid services, ceremonies, funerals and other sensitive periods in and around places of worship and churchyards.
- Neighbours and stakeholders are informed in advance of noisy phases; complaints are logged, investigated and responded to, and are reported to the client.

5. Responsibilities

- The Managing Director holds overall responsibility for environmental management, approves this policy, ensures adequate resources are provided to implement it, and reviews it annually.
- The Managing Director and the lead conservator on each project ensure environmental risks are identified in the project RAMS, that the controls in section 4 are applied on the project, and that any consents, licences or ecological method statements are in place before work starts.
- The lead operative nominated for each project implements the controls day to day, carries out site checks, delivers toolbox talks, and stops work where an environmental risk is uncontrolled.
- Everyone working for the Company, and all subcontractors and suppliers working on our behalf, must comply with this policy, work in a manner that minimises environmental impact, and report environmental risks, incidents, near misses and non-compliances immediately.

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6. How This Policy Is Communicated

- Site inductions — every operative and subcontractor is briefed on the site-specific environmental constraints, including drainage, ecology and waste arrangements, before starting work.
- RAMS — environmental controls are written into the risk assessment and method statement for each project and signed by all operatives before work commences.
- Toolbox talks — environmental topics are included in the weekly toolbox talk programme, with attendance recorded on signed sign-off sheets.
- Policy display and issue — this policy is displayed with company policies and issued to everyone working for the Company, with a signed communication record retained.
- Subcontractor prequalification and orders — environmental expectations are communicated through the prequalification questionnaire, subcontract order conditions and site induction.
- WhatsApp site groups and site meetings — used for day-to-day communication of environmental instructions and rapid resolution of queries.

7. Emergency Preparedness and Incident Response

Spill kits, drain covers and absorbent materials appropriate to the substances in use are held on every site and their location is covered at induction. In the event of a spill or an uncontrolled discharge, operatives are instructed to stop work, contain the release, protect drains and watercourses, and notify the lead operative nominated for the project immediately.

The lead operative notifies the Managing Director, who determines whether the incident is reportable to the Environment Agency, the sewerage undertaker, the local authority or Natural England (or, in Wales, Natural Resources Wales), and makes any required notification without delay. All environmental incidents and near misses are recorded, investigated for root cause, and closed out with corrective and preventive action; trends are reviewed at the annual policy review.

8. Objectives, Monitoring and Continual Improvement

Environmental performance is monitored through site inspections by the lead operative and the Managing Director, independent site inspections by BSG (Building Safety Group), carried out monthly, or as needed, while projects are running, review of waste transfer and consignment records, fuel and mileage data, and the environmental element of the project Key Performance Indicators agreed with the customer.

Measurable objectives are set annually by the Managing Director against the aspects in section 4, prioritising the establishment of reliable fuel, waste and water data as the basis for reduction targets, and supporting our progression towards ISO 14001 certification and net zero. Progress is reported at the Managing Director's management review.

9. Policy Review

This policy is reviewed annually by the Managing Director, or sooner following a significant environmental incident, a change in legislation, or a material change in the nature or scale of our operations.

Supporting evidence (maintained and available on request): environmental aspects and impacts register; project RAMS and site-specific environmental controls; drainage and runoff assessments; ecological survey reports and method statements; waste transfer and hazardous waste consignment notes; registered waste carrier and permitted facility records; fuel, mileage and utility data; COSHH assessments for biocides,

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solvents and consolidants; BSG site inspection reports; toolbox talk sign-off sheets; Environmental Policy Communication & Briefing Record; environmental incident and near-miss register.

Approval

This document is approved by the Managing Director and is reviewed at least annually, or sooner following a significant change in legislation, the business or its activities.

Signed	Signed copy held on file
Name	Jake Motley
Position	Managing Director, SSH Conservation Ltd
Date	22 October 2026

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