



# **Demolition Environmental Management Plan**

St. Ann's New Neighbourhood

October 2022

**Waterman Infrastructure & Environment Limited** 

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Client Name: Hill Residential Limited, Catalyst Housing Limited and Catalyst by

Design Limited

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# Quality Assurance – Approval Status

This document has been prepared and checked in accordance with Waterman Group's IMS (BS EN ISO 9001: 2015, BS EN ISO 14001: 2015 and BS EN ISO 45001:2018)

Issue	Date	Prepared by	Checked by	Approved by
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				Due Alla

**Comments** First issue in draft for client review.

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**Comments** Second issue with Phase 1a and 1b phasing dates.

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**Comments** Third issue updated following receipt of client comments.



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# **Contents**

#### **List of Abbreviations**

1.	Intro	duction	1
	1.1	The Brief	1
	1.2	Background	1
	1.3	Report Scope	2
	1.4	Report Structure	2
	1.5	Assumptions and Limitations	2
2.	The	Site and Proposed Development	4
	2.1	Site Location and Current Layout	4
	2.2	Surrounding Area	5
	2.3	Historical Uses	6
	2.4	Proposed Development	7
	2.5	Construction Programme	7
3.	Appl	licable Codes and Standards	8
	3.1	Relevant Guidance and Standards	8
	3.2	Considerate Constructors Scheme (CCS)	8
	3.3	Contractor Management System	8
	3.4	Working at Construction and Demolition Sites: PPG6	8
	3.5	LBH's Sustainable Design and Construction SPD 2013	8
	3.6	The Applicant's Sustainability Targets	g
4.	Resp	oonsibilities and Contacts	10
	4.1	Key Responsibilities	10
	4.2	UK Environmental Regulators	11
	4.3	Key Project Contacts	12
5.	Gene	eral Site Management	14
	5.1	Introduction	14
	5.2	Working Hours	14
	5.3	Access and Security	14
	5.4	Hoarding and Pedestrian Safety	15
	5.5	External Lighting	15
	5.6	Site Facilities	16
	5.7	Storage	16
	5.8	Tree Protection	16
	5.9	Temporary Utility Services	17
6.	Air C	Quality and Dust Management	18
	6.1	Introduction	18
	6.2	Relevant Legislation and Guidance	18
	6.3	Potential Impacts	19
	0.0	1 Otombal Impacto	



	6.5	Procedures	19
	6.6	Documentation	20
7.	Demo	lition Waste Management Strategy	21
	7.1	Introduction	21
	7.2	Relevant Legislation and Guidance	22
	7.3	Procedure	23
	7.4	Sustainability Targets	24
	7.5	Documentation	24
8.	Comn	nunity Engagement and Management of Complaints	25
	8.1	Introduction	25
	8.2	Relevant Legislation	25
	8.3	Procedure	25
	8.4	Documentation	26
9.	Noise	and Vibration Management	27
	9.1	Introduction	27
	9.2	Relevant Legislation and Guidance	27
	9.3	Baseline Noise and Vibration	27
	9.4	Procedures	28
	9.5	Documentation	28
10.	Water	Management and Pollution Control	29
	10.1	Introduction	29
	10.2	Relevant Legislation and Guidance	29
	10.3	Potential and Impacts	30
	10.4	Pollution Incident Response Plan	30
	10.5	Procedures	31
	10.6	Documentation	32
11.	Archa	eology and Built Heritage	34
	11.1	Potential Impacts	34
	11.2	Procedure	34
	11.3	Documentation	34
12.	Manag	gement of Soil Contamination	35
	12.1	Introduction	35
	12.2	Relevant Legislation and Guidance	35
	12.3	Procedures	35
	12.4	Monitoring	35
	12.5	Documentation	36
13.	Enviro	onmental Auditing and Verification Monitoring	37
	13.1	Introduction	37
	13.2	Environmental Reviews	37
	13.3	Documentation	37



Figures		
Figure 1:	Sitewide demolition plan	4
Figure 2:	The waste hierarchy:	21
Figure 3:	Discovery strategy for unforeseen contamination	36
Tables		
Table 1:	Summary of potentially sensitive receptors	5
Table 2:	Site Phasing	7
Table 3:	Key responsibilities	10
Table 4:	UK environmental regulators	12

# **Appendices**

- A. Plans and Drawings
- B. Site Review Record Sheet



# **List of Abbreviations**

AQMA Air Quality Management Area

AQDMP Air Quality and Dust Management Plan

BREEAM Building Research Establishment Environmental Assessment Method

CCS Considerate Constructors Scheme

COSHH Control of Substances Hazardous to Health

DEMP Demolition Environmental Management Plan

DPD Development Plan Document

EA Environment Agency

EMS Environmental Management System

ES Environmental Statement

HSE Health and Safety Executive

IAQM Institute of Air Quality Management

ISO International Organization for Standardization

LBH London Borough of Haringey

NOx Nitrogen Oxides

NPPF National Planning Policy Framework

NRMM Non-road mobile machinery

PM Particulate Matter

PPE Personal protective equipment
PPG Pollution Prevention Guidance

SINC Site of Importance for Nature Conservation

SPD Supplementary Planning Document

SWMP Site Waste Management Plan

TPO Tree Preservation Order

WMM Waste Minimisation and Management



#### 1. Introduction

#### 1.1 The Brief

Waterman Infrastructure & Environment Limited (Waterman) has been instructed by Hill Residential Limited, Catalyst Housing Limited, and Catalyst by Design Limited (the Applicant) to prepare a Demolition Environmental Management Plan (DEMP) for the redevelopment of part of St Ann's hospital (the Site). The Site lies within the administrative boundary of the London Borough of Haringey (LBH).

## 1.2 Background

#### 1.2.1 Planning application HGY/2022/1833

In July 2022, the following hybrid planning application with reference HGY/2022/1833 was made to LBH: *"1. detailed planning for Phase 1a, for:* 

- a) the change of use, conversion and alteration of seven existing hospital buildings within Phase 1a for a flexible range of uses (Use Class E, F1 / F2);
- b) the demolition of some existing buildings (in accordance with the demolition plan);
- c) the erection of new buildings for residential uses (Use Class C3); and
- d) alterations to the existing access road and installation of new vehicular, pedestrian and cycle accesses; landscaping including enlargement of the Peace Garden, associated car and cycle parking spaces and servicing spaces.
- 2. the demolition of existing buildings and structures in Phases 1b, 2 and 3 (in accordance with the demolition plan);
- 3. outline planning (all matters reserved except access) for Phases 1b, 2 and 3 for:
  - a) the erection of new buildings for residential development (Use Class C3), commercial business and service (Use Class E), and local community and learning (Use Class F1 / F2); and
  - b) associated pedestrian and cycle accesses; landscaping including enhancements to the St Ann's Hospital Wood and Tottenham Railsides Site of Importance for Nature Conservation (SINC) car and cycle parking spaces and servicing spaces."

Documents accompanying the planning application included:

- Arboricultural Impact Assessment prepared by The Environment Partnership (TEP) in May 2022;
- Archaeological Desk Based Assessment prepared by RPS in March 2022;
- Air Quality Assessment prepared by RSK in May 2022;
- Built Heritage statement prepared by Turley in May 2022;
- Construction Dust Assessment methodology prepared by RSK;
- Contaminated Land Assessment prepared by IDOM in May 2022;
- Environmental Statement prepared by Stantec in May 2022;
- Outline Construction Logistics Plan prepared by Waterman in May 2022;
- Pre-demolition audit prepared by Reusefully Ltd in November 2021 and revised in April 2022;
- Outline Site Waste Management Plan (SWMP) prepared by Waterman in May 2022;
- Sustainability Statement prepared by Bioregional in May 2022;

LBH's decision on this planning application is currently pending.



## 1.3 Report Scope

The aim of this DEMP is to ensure potential impacts to the environment and sensitive local receptors resulting from the demolition works in relation the proposed demolition are avoided or minimised, as far as reasonably practicable. It focuses on the demolition of built structures within Phases 1a and 1b of the proposed development. It can be used to satisfy a forthcoming planning condition, if any, requiring the submission of a DEMP (or similar).

#### This report also:

- demonstrates how demolition and other Site activities will consider the requirements of environmental legislation, policy, and other relevant standards;
- identifies nearby sensitive receptors that could be impacted by demolition activities;
- systematically considers environmental impacts associated with demolition;
- demonstrates how the Applicant and its Principal Contractor will consider, assess, and mitigate these
  potential impacts; and
- provides a review, monitoring, and audit mechanism for environmental performance as the project progresses.

This report should be read alongside the Applicant's detailed Construction Logistics Plan (CLP) prepared by Waterman in October 2022.

The Principal Contractor, when appointed, will have overall responsibility for works at the Site. It will also be expected to refine the demolition strategy and update this document as the project progresses.

This DEMP is intended to be a living document. It will be subject to refinement as the project evolves, and any significant changes would be agreed with LBH where required.

#### 1.4 Report Structure

This DEMP systematically considers the following topics:

- the Site and the Proposed Development;
- codes and standards applicable to the demolition works;
- · responsibilities and contacts;
- general site management (including external lighting);
- demolition waste management;
- community engagement and management of complaints;
- noise and vibration;
- water management and pollution incident control;
- · archaeology and built heritage;
- · management of soil contamination; and
- environmental auditing and verification monitoring.

# 1.5 Assumptions and Limitations

This report was undertaken in accordance with a scope of works agreed between Waterman and the Applicant as detailed in Waterman's fee letter (reference WIE18513.104-106.Q1.2.1 dated 15 September 2022)



The content of this document is based on information made available to Waterman during preparation of the planning application.

It is assumed this DEMP will be reviewed and further developed prior to the start of the project

The Principal Contractor, once appointed, will agree to comply with the arrangements set out in this document and update it as necessary throughout the demolition phase.



# 2. The Site and Proposed Development

# 2.1 Site Location and Current Layout

The location of the Site is shown in the figure below. A larger version of this drawing can be found in Appendix A.

Figure 1: Sitewide demolition plan



Source: Karakusevic Carson Architects, 'Sitewide, Phasing Plan, Demolition', N15301-KCA-ZZ-ZZ-DR-A-00005 revisions C01, dated 23 May 2022.

The Site is approximately 7.2 hectares (ha) in area, centred at approximate National Grid Reference 532589, 188605. It comprises access roads, green spaces, hardstanding, healthcare buildings, parking spaces and the Peace Garden (a communal garden). The healthcare buildings include Mayfield House, a locally listed building, and other heritage assets that form part of the St Ann's Conservation Area. Nine individual Tree Preservation Orders (TPOs) and one group TPO are present on Site.



# 2.2 Surrounding Area

The surrounding area is predominantly residential. The north of the Site is bound by the B152 St Ann's Road. St Ann's Hospital lies to the east. The Overground train line stretch between Barking and Gospel Oak runs along the southern edge of the Site. St Ann's Woodland Site of Importance for Nature Conservation (SINC) lies to the south and southeast. The western edge of the Site adjoins the back gardens of residences on Warwick Gardens.

# 2.2.1 Nearby potentially sensitive receptors

Potentially sensitive receptors are summarised in the table below. The mitigation measures to be implemented during demolition would endeavour to minimise disturbance to these receptors.

Table 1: Summary of potentially sensitive receptors

Category	Sensitive receptor / land use	Nearest approximate distance from the site boundary within 500m
	Residences with gardens on St Ann's Road	165-500m north
	Residences with gardens on Hermitage Road	300-500m east
Residential	Residences with gardens on Suffolk Road	420-500m east
	Residences with gardens on Wiltshire Gardens	245-500m southwest
	Warwick Gardens and other residences with back gardens	0-500m west
	Woodlands Park Nursery School and Children Centre	360m northwest
	Chestnuts Primary School	200m north
	West Green Primary School	430m north
Educational	St Ann's Church of England Primary School	465m east
	St Mary's Infant & Juniors School	250m east
	Islamic Shakhsiyah Foundation	315m east
	Tiverton Primary School	355m southeast
	St Ann's Food and Wine off licence	245m northwest
	Chestnut cafe	14m northeast
	D&S Food and Wine	280m northeast
	Armagan Supermarket	220m southeast
	London Scrap Metal Recycling	495m southeast
Commercial	Harringay warehouse district	310m southeast
	Arena design centre	70m south
	Crusader Industrial estate	150m south
	Sainsbury's Supermarket	235m southwest
	Arena Shopping Park	385m southwest
	Shops, restaurants and other commercial properties on Green Lanes (A105)	445m west



Category	Sensitive receptor / land use	Nearest approximate distance from the site boundary within 500m
	Chestnuts Park	10m north
	Chestnuts community centre	70m northeast
	St Ann's Church, South Tottenham	350m east
	Sheikh Nazim Sufi Centre	315m east
Community / recreational	Manchester Gardens	480m southeast
Community / recreational	The Bridge Community Hut	435m southeast
	Tewksbury Road Open Space	385m southeast
	Islington Sports Academy	65m south
	Chapel in the valley	155m southwest
	Kurdish Community Centre	355m southwest
	Parish Church of St Ann	345m east
Built heritage – Listed	St Ann's Church School	315m east
Buildings	1-5 Avenue Road N15	350m east
	Walls Around St Ann's Church yard	345m east
	St Ann's Road (B152)	0m north
	Bus stops on St Ann's Road (B152)	0m north
	Overground line	35m south
Transportation	Seven Sisters Road (A503)	485m south
Transportation	Victoria line	485m south
	Harringay Green lanes train station	415m southwest
	Piccadilly line	330m west
	Green lanes (A105)	435m west
Habitats and species	Deciduous Woodland priority habitat	10m north, 0m south

#### 2.3 Historical Uses

The Contaminated Land Assessment prepared as part of the planning application included the following information about historical land uses on Site and in the surrounding area.

The Site area historically supported agricultural uses until the 1890s when St. Ann's hospital was built. The Site has remained as a hospital until present day, with only minor layout changes (e.g. extensions and additional buildings). Above ground fuel storage tanks were installed in the southern portion of the Site in the 1960s. Two electricity substations are located at the centre of the Site, the first installed in the 1970s and the second in the 1980s. An infilled pond reportedly exists in the north-western corner of the Site.

Potential contaminative land uses within 250m reportedly include:

- laundrette (100m northeast);
- bedstead factory (120m northeast);



- a burial ground (120m east);
- petrol station (130m east);
- garage (150m east);
- industrial estate (adjacent to the overground line beyond the southern boundary);
- furniture works (100m south);
- St Ann's Works plastic moulding (adjacent to western site boundary); and
- electricity substation (adjacent to western site boundary).

Two infilled ponds were noted, at 167m and 248m southeast of the Site.

## 2.4 Proposed Development

The Proposed Development is described in section 1.2.1. It includes residential, commercial, and community uses and will be constructed in phases.

In summary, the scheme proposes:

- · demolishing existing buildings;
- constructing a mix of residential, commercial, and community uses;
- retaining and enhancing seven of the existing hospital buildings and St Ann's Road historic wall; and
- · hard and soft landscaping, including the Peace Garden, and associated works.

A plan of the retained buildings is included in Appendix A.

#### 2.5 Construction Programme

The table below summarises the Applicant's anticipated demolition and construction build sequence for Phase 1a and Phase 1b.

Table 2: Site Phasing

Activities	Phase 1a	Phase 1b
Site set up and demolition and remediation	March 2023 – September 2023	March 2023 – November 2023
Infrastructure and roads	October 2023 – January 2024	September 2024 – November 2024
Basement excavation and piling	January 2024 – May 2024	November 2024 – March 2025
Substructure	February – September 2024	January 2025 – July 2025
Superstructure	March 2024 – March 2025	March 2025 – November 2025
Cladding	June 2024 – November 2025	May 2025 – June 2026
Fit-out and commissioning	July 2025 – March 2026	June 2025 – October 2026



# 3. Applicable Codes and Standards

#### 3.1 Relevant Guidance and Standards

The following guidance and standards are relevant to this section:

- the Considerate Constructors Scheme (CCS);
- International Organization for Standardization (ISO) 14001 environmental management system;
- PPG6, working at construction and demolition sites (withdrawn in 2015 but remains good practice);
- LBH's Sustainable Design and Construction Supplementary Planning Document (SPD) 2013; and
- the Applicant's sustainability targets.

## 3.2 Considerate Constructors Scheme (CCS)

The aim of the CCS is to improve the image of construction by encouraging good communication with neighbours, good quality welfare facilities, and greater environmental awareness.

The appointed Principal Contractor will be expected to work under the guidelines of the CCS. Its targeted score will be added to this document in due course.

## 3.3 Contractor Management System

The appointed Principal Contractor will be required to have an Environmental Management System which is accredited to, or in accordance with, ISO 14001, the international standard for Environmental Management Systems (EMS). Once appointed, the Principal Contractor will be expected to:

- adhere to all procedures and guidelines stated within this DEMP;
- consider this DEMP in its policies, procedures, targets, and objectives;
- · comply with all relevant legislation; and
- implement pollution prevention policies and procedures on Site in accordance with Working at Construction and Demolition Sites: PPG6, Pollution Prevention Guidelines.

#### 3.4 Working at Construction and Demolition Sites: PPG6

Pollution Prevention Guidelines (PPG) "Working at construction and demolition sites: PPG6" (second edition) was published by the Environment Agency in 2012. It was withdrawn in 2015 but remains good practice. It is aimed at Site managers, foremen, and supervisors / anyone who manages the day-to-day operation of a demolition Site. It includes guidance on pollution prevention planning, drainage, materials storage, oil use, waste management, and incident response.

# 3.5 LBH's Sustainable Design and Construction SPD 2013

A Sustainable Design and Construction SPD¹ was adopted by LBH in March 2013 which provides guidance on how development in Haringey should be designed to ensure that it is as sustainable as possible. Environmental aspects it advises on include:

- water management;
- pollution air, noise, light and land;
- waste minimisation and management;

<sup>&</sup>lt;sup>1</sup> LBH "Sustainable Design & Construction Supplementary Planning Document" available from <a href="https://www.haringey.gov.uk/planning-and-building-control/planning-policy/local-plan/supplementary-planning-guidance-documents/sustainable-design-and-construction-spd">https://www.haringey.gov.uk/planning-and-building-control/planning-policy/local-plan/supplementary-planning-guidance-documents/sustainable-design-and-construction-spd</a> (accessed October 2022).



- biodiversity areas of protection and methods of improvement; and
- transport sustainable modes and accessibility.

# 3.6 The Applicant's Sustainability Targets

The Applicant's sustainability aspirations are set out in its document titled "St Ann's New Neighbourhood Sustainability Statement", prepared by Bioregional supported by the Building Research Establishment Environmental Assessment Method (BREEAM) pre-assessment prepared by XCO2 that is appended to it.

The Applicant is aiming to achieve a rating of BREEAM 'Excellent' for new build non-residential areas under BREEAM New Construction 2018.

The BREEAM pre-assessment targeted the following issues of relevance (credits) to the DEMP:

- Man 3, responsible construction practices, complying with which involves:
  - operating an environmental management system during demolition, e.g. ISO 14001;
  - actions (to be implemented by the Principal Contractor) to minimise risks such as pollution management; and
  - assigning responsibility to an individual for monitoring, recording, and reporting energy use, water consumption, and transportation data (where measured).
- Mat 03, responsible sourcing of materials;
- Wst 01, construction waste management, complying with which involves completing a pre-demolition audit (more detail is included in section 7); and
- Wst 02, use of recycled and sustainably sources aggregates, which also requires completion of a predemolition audit.



# 4. Responsibilities and Contacts

# 4.1 Key Responsibilities

To ensure environmental standards are maintained, every person working on Site should be aware of their responsibilities. Responsibilities are set out in the table below. This table may be completed and reproduced to be displayed on site notice boards or used in staff training as required.

In general, the Principal Contractor will have overall responsibility for implementation of the DEMP including detailing roles and responsibilities in method statements and plans of work for each activity. It should be noted that multiple roles can be fulfilled by one person / party.

As part of their induction, all site personnel must be made aware of the importance of maintaining good relations with the local community and neighbours.

Table 3: Key responsibilities

rable 5. Rey responsibilities	
Person / organisation	Responsibility
The Applicant: Hill Residential Limited, Catalyst Housing Limited and Catalyst by Design Limited	<ul> <li>undertaking formal communication with neighbours and LBH in relation to key stages of the works.</li> </ul>
Project Manager:  To be confirmed	<ul> <li>person involved in the management of the project on behalf of the Applicant, issuing instructions to the Principal Contractors necessary.</li> </ul>
Principal Contractor:	ensuring the requirements of this DEMP are adhered to at all times;
To be confirmed	<ul> <li>ensuring all site staff and contractor(s) undertake their activities in accordance with best practice and the requirements of the DEMP;</li> </ul>
	liaising with LBH as appropriate;
	<ul> <li>ensuring appropriate monitoring is undertaken by the nominated environmental monitoring co-ordinator (see below);</li> </ul>
	<ul> <li>ensuring that unacceptable levels of environmental pollution (including fuel spillages, odour, noise, dust, or vibration) do not arise from their activities on the Site;</li> </ul>
	ensuring that:
	<ul> <li>statutory environmental requirements are met;</li> </ul>
	<ul> <li>environmental good practice and control is employed;</li> </ul>
	<ul> <li>relevant procedures are followed;</li> </ul>
	<ul> <li>resources (personnel and financial) are available to meet the environmental management requirements; and</li> </ul>
	<ul> <li>corrective actions are implemented.</li> </ul>
	<ul> <li>all visitor, workforce and community accidents, incidents and near misses are recorded and action taken to reduce the likelihood of them recurring;</li> </ul>
	<ul> <li>records and other relevant documentation are maintained;</li> </ul>
	<ul> <li>adequate processes and equipment are in place to ensure that staff and site occupants are provided for in the case of a medical emergency;</li> </ul>
	<ul> <li>identifying and implementing initiatives to promote and maintain the health and wellbeing of all site operatives within the Site footprint;</li> </ul>
	<ul> <li>establishing management practices and facilities encouraging equality, fair treatment and respect of all site operatives; and</li> </ul>



Person / organisation	Responsibility
	<ul> <li>providing secure, clean, and organised facilities for all operatives within the Site footprint.</li> </ul>
Transport Co-ordinator (nominated by, and reporting to, the Principal Contractor): To be confirmed	<ul> <li>co-ordinating deliveries and controlling vehicles accessing and leaving the Site;</li> <li>recording distances travelled by each vehicle to and from the Site; and</li> <li>ensuring that fleet operators capture and investigate any road accidents, incidents and near misses and reports these back to the Principal Contractor where such statistics will be analysed.</li> </ul>
Environmental Monitoring Coordinator (nominated by, and reporting to, the Principal Contractor):  To be confirmed	<ul> <li>monitoring dust, noise and vibration within the vicinity of the Site as required;</li> <li>auditing of DEMP; and</li> <li>ensuring that complaints regarding dust, noise or vibration are appropriately investigated and responded to.</li> </ul>
Liaison Manager (nominated by, and reporting to, the Principal Contractor):  To be confirmed	<ul> <li>liaison with neighbours and LBH regarding site specific issues;</li> <li>producing a regular newsletter to inform stakeholders of progress, issues and upcoming work; and</li> <li>keeping the site notice board up to date, including with appropriate contract information.</li> </ul>
Designer: To be confirmed	<ul> <li>minimising the production of waste through design, incorporating standard length materials;</li> <li>selecting materials with a lower environmental impact wherever possible; and</li> <li>ensuring the development design meets the requirements of the Construction (Design and Management) Regulations 2015 (minimising hazards for construction e.g. use of hazardous materials).</li> </ul>
Sub Principal Contractor Site managers: To be confirmed	<ul> <li>reporting incidents to the Principal Contractor;</li> <li>minimising waste;</li> <li>ensuring that all staff adhere to statutory environmental requirements and the DEMP;</li> <li>ensuring that resources (personnel and financial) are available to meet the environmental management requirements;</li> <li>ensuring that corrective actions are implemented; and</li> <li>Ensuring that records and other relevant documentation are maintained and reported to the Principal Contractor including energy use and water consumption.</li> </ul>
Site personnel: To be confirmed	<ul> <li>all site staff are responsible for adhering to the requirements of the procedures outlined in this DEMP, ensuring that legislative requirements and good environmental practice are met within their job function; and</li> <li>as part of the site induction, all staff will be made aware of the importance of maintaining good relations with the local community and neighbours.</li> </ul>

# 4.2 UK Environmental Regulators

Details of the UK environmental regulators responsibilities and contact numbers are provided in the table below.



Table 4: UK environmental regulators

Regulator	Responsibilities	Contact number	Website
Environment Agency	Discharges to land and controlled waters, waste, effluent discharges, abstraction licenses, some nature conservation functions, ground contamination and enforcing environmental legislation.	03459 33 55 77	www.environment- agency.gov.uk
LBH	Noise, air quality, traffic, the planning process and contaminated land. Some powers under waste legislation to stop, search waste carriers and confiscativehicles.	020 8489 5504 e	https://www.haringey.gov.uk/ contact-haringey-council

# 4.3 Key Project Contacts

Key contacts will be provided and agreed following the appointment of the Principal Contractor and prior to work commencing at the Site.

## 4.3.1 Site address and planning reference

Address: St Ann's General Hospital, St Ann's Road, London, N15 3TH

Planning reference to which the DEMP applies: HGY/2022/1833

#### 4.3.2 Demolition Environmental Management Plan

Contact details for the person responsible for submitting the final DEMP.

Name: to be confirmed
Address: to be confirmed
Email: to be confirmed
Phone: to be confirmed

# 4.3.3 Project Manager

Contact details of the Site project manager responsible for day-to-day management of the works and dealing with any complaints from local residents and businesses.

Name: to be confirmed by the Principal Contractor
Address: to be confirmed by the Principal Contractor
Email: to be confirmed by the Principal Contractor
Phone: to be confirmed by the Principal Contractor



# 4.3.4 Community liaison

Contact details of person responsible for community liaison and dealing with any complaints from local residents and businesses.

Name: to be confirmed

Address: to be confirmed

Email: to be confirmed

Phone: to be confirmed

# 4.3.5 The Principal Contractor

Contact details of where the Principal Contractor accepts receipt of legal documents for the person responsible for the implementation of the DEMP.

Name: to be confirmed
Address: to be confirmed
Email: to be confirmed
Phone: to be confirmed



# 5. General Site Management

#### 5.1 Introduction

This section addresses the general Site management practices that should be employed to ensure safe and compliant operation of the works. Surrounding receptors have been considered.

The Principal Contractor will be responsible for establishing the following procedures, detail of which (including any road closures and hoarding specifications) will be added to this document in due course.

More detail about construction vehicle routing, access to the Site, pedestrian safety, etc. applicable to the proposed demolition works can be found in the Applicant's detailed Construction Logistics Plan.

## 5.2 Working Hours

The hours of work shall be restricted to the following periods:

- between 08:00 and 18:00 hours Monday to Friday;
- between 08:00 and 13:00 hours on Saturday; and
- none on Sundays / public holidays.

The Principal Contractor will also have a period of up to one hour before and up to one hour after normal working hours (detailed above) for start-up and close-down. This will include (but not be limited to), for example:

- deliveries;
- moving equipment;
- unloading;
- maintenance and general preparation works; and
- start of shift safety / environmental briefings

This will not include the operation of plant or machinery likely to cause a disturbance to local sensitive receptors.

No work (except in the case of an emergency, for health and safety reasons or general office-based work) may be carried out on Sundays, Bank Holidays or public holidays or undertaken out of hours without prior agreement with LBH.

It is recognised that there may be circumstances where the restriction on hours of work cannot be adhered to and where work cannot be completed within the hours of a single working day, but that also cannot be carried over to the following day. The Principal Contractor will endeavour to minimise the frequency and duration of such works. However, where unavoidable, the Principal Contractor will be required to justify any proposed deviation from these operating periods, provide written justification to LBH, and, where practicable, notify neighbours before works outside normal hours commence.

#### 5.3 Access and Security

It is likely the Site will be accessed from St Ann's Road (B152) to the north. More detail about vehicle routing and access can be found in the Applicant's detailed Construction Logistics Plan.



Security measures are likely to include:

- operation of a security pass system at the main gate(s);
- requiring all staff to sign in and out;
- obligatory inductions to allow access;
- clearly marking the main gate and work perimeters with warning signs detailing potential hazards;
- segregating vehicle and pedestrian access;
- demarcating vehicle and pedestrian routes;
- using crowd barriers where practicable;
- locking access points out of hours;
- providing alarms in line with Health and Safety Executive (HSE) requirements;
- installing CCTV at the main gate;
- retaining CCTV data for at least two weeks after the time of recording, which will be made available to LBH on request; and
- logging security events and making these logs available to LBH on request.

# 5.4 Hoarding and Pedestrian Safety

Hoarding will be maintained around the Site at all times. The hoarding will be inspected on a regular basis to ensure the safety of pedestrians using adjacent pavements is not compromised.

It is possible that portions of the surrounding pavement will be closed during the demolition works and that the hoarding will therefore follow the kerb line in order to provide sufficient working room. Where required, the positioning of this hoarding must be agreed in writing with LBH and all relevant licenses acquired prior to its installation. Pedestrians will be redirected safely to alternative pedestrian routes.

Where hoarding may obstruct pedestrian lighting, additional lighting will be provided (in line with the procedures set out in the lighting section below). These will be lit during the hours of darkness and maintained during the works.

An appropriate licence will be sought for any structures that overhang the pavements.

Further information about pedestrian management is set out in the Applicant's detailed Construction Logistics Plan.

#### 5.5 External Lighting

Generally, lighting will be sensitively positioned and kept to a minimum wherever possible, considering the needs for health and safety and security.

Any new external lighting will be designed in accordance with relevant guidance such as the Institution of Lighting Professionals guidance note for reduction of obtrusive light<sup>2</sup>.

Before installing any floodlighting, details will be submitted to and approved in writing by LBH. The floodlighting will thereafter be installed and operated in accordance with LBH's approval.

<sup>&</sup>lt;sup>2</sup> Institution of Lighting Professionals guidance "Guidance Note GN01/21: The Reduction of Obtrusive Light" 2021, available from <a href="https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/">https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/</a> (accessed October 2022).



#### 5.6 Site Facilities

An indicative location for Site offices and welfare facilities (in the Site's north-eastern corner) is shown on the Phase 1a and 1b demolition plan included in Appendix A.

Facilities to be provided by the Principal Contractor will include staff welfare facilities and a Site office installed for the Principal Contractor who will hold documentation required by this DEMP. All facilities will be contained within the curtilage of the Site area. Their locations will be agreed between the Principal Contractor and LBH.

Procedures pertaining to the use of these facilities will include:

- instructing site staff not to congregate on the pavement outside the main gate unless required to do so as part of their work / in event of an emergency;
- educating staff about the dress code and inappropriate behaviour (e.g. the use of radios) during inductions:
- running a staggered break system where practicable to prevent large groups of staff visiting local shops at the same time;
- providing adequate waste and recycling storage facilities to minimise littering, and arranging for these containers to be regularly serviced to minimise the potential for vermin;
- · designating smoking areas; and
- maintaining good housekeeping across the site.

The Principal Contractor will maintain housekeeping standards across the Site, such that the Site is safe, clean and organised. This includes but is not limited to facilities, materials and waste storage.

#### 5.7 Storage

All raw and salvaged materials will be appropriately stored on Site to minimise damage by vehicles, weather, contamination by other substances, or theft / vandalism. It is unlikely any substantial external storage will occur due to space restrictions. Secure storage will be provided for items of high value, materials which are hazardous, or which are easily damaged. Packaging will be retained on goods until the materials are required. Once removed, packaging materials will be stored and returned to the supplier wherever possible. Goods will be delivered on an "as needed / just in time / early doors" basis to reduce stockpiling on the Site, damage from vehicles and / or weather, and other causes of wastage.

#### 5.8 Tree Protection

Details of the Applicant's proposed tree strategy, including the locations of existing trees to be retained, is included in Appendix A.

As specified in the Sustainability Statement, the Applicant is committed to retaining on Site green features and will where possible abide by the Tree Preservation Orders (TPOs) found on the Site. In total there are nine individual tree TPOs and one group TPO. As part of the planning application, of the nine individual TPOs: seven are to be retained; one will be translocated; and the other will be removed. Any further tree removals will be avoided where possible.

The Applicant's Arboricultural Impact Assessment anticipated that tree protection measures to be observed during demolition / construction would be provided in the form of an Arboricultural Method Statement secured by planning condition.



# 5.9 Temporary Utility Services

The Principal Contractor will be expected to provide temporary utility services (power and water) for the work



# 6. Air Quality and Dust Management

#### 6.1 Introduction

An Air Quality Assessment was prepared by RSK in May 2022. RSK's assessment included:

- baseline area quality levels;
- a qualitative assessment of the construction phase using 2014 IAQM guidance (v.1.1); and
- recommendation of mitigation measures, where appropriate, to ensure any adverse effects on air quality are minimised.

RSK predicted a negligible impact on air quality in terms of nitrogen dioxide (NO<sub>2</sub>), PM<sub>10</sub>, and PM<sub>2.5</sub> concentrations at existing sensitive receptors. These findings were given under the assumption there were no mitigation measures in place.

RSK concluded the development's construction phase impacts (including demolition) could be mitigated through appropriate on Site controls, some of which are summarised in section 6.5.2 below.

## 6.2 Relevant Legislation and Guidance

- Environmental Protection Act 1990; Part III Statutory Nuisance;
- Control of Substances Hazardous to Health (COSHH) Regulations 2002, as amended;
- Control of Pollution Act 1974;
- Clean Air Act 1993;
- The Health and Safety at Work Act 1974;
- Clean Neighbourhoods and Environment Act 2005;
- Air Quality (England) Regulations 2000, as amended;
- Air Quality Standards Regulations 2010;
- Environmental Permitting (England and Wales) Regulations 2016;
- UK Air Quality Strategy 2007;
- National Planning Policy Framework 2021;
- Department for Environment, Food and Rural Affairs, Clean Air Strategy 2019
- Improving Air Quality in the UK: Tackling Nitrogen Dioxide in our Towns and Cities. UK Air Quality Plan for Tackling Nitrogen Dioxide 2017;
- Environmental Protection UK (EPUK) & Institute of Air Quality Management (IAQM) Guidance; Land-Use Planning & Development Control: Planning for Air Quality 2017;
- Planning Practical Guidance: Air Quality 2021;
- Environment Act 2021 Environmental Targets Particulate Matter;
- Local Air Quality Management Policy Guidance 2016;
- IAQM Guidance on the Assessment of Dust from Demolition and Construction 2014;
- Mayor of London's Supplementary Planning Guidance: The Control of Dust and Emissions During Construction and Demolition 2014:
- IAQM Guidance on the Assessment of Dust from Demolition and Construction 2014;
- IAQM Guidance on Monitoring in the Vicinity of Demolition and Construction Sites 2018; and
- Non-road mobile machinery (NRMM) of net power between 37KW and 560KW used on Site are



required to meet specific standards. This applies to NRMM engines for both Nitrogen Oxides (NOx) and Particulate Matter (PM) emissions. These standards are based upon engine emissions standards set in EC Directive 97/68/EC.

## 6.3 Potential Impacts

Potential effects on local air quality conditions from demolition works can include:

- nuisance from dust deposition onto surfaces such as clothes, cars, or windows;
- harm to ecological receptors;
- impact on air quality from nitrogen dioxide (NO<sub>2</sub>), carbon dioxide (CO<sub>2</sub>), and particulate measuring 10µm or less (PM<sub>10</sub>) from construction works and road traffic emissions to and from the Site;
- undesirable odours emitted from contaminated excavated material (if present);
- · emissions from site plant and construction vehicles may adversely affect local air quality; and
- impact on the health of sensitive individuals from dust inhalation and air pollution.

## 6.4 Baseline Air Quality

Road traffic was shown to be the main source of air pollution, due to the proximity of St Ann's Road, A105 Green Lanes and A503 Seven Sisters Road.

The Principal Contractor will consider RSK's baseline air quality monitoring data to inform its Action Levels in due course.

#### 6.5 Procedures

#### 6.5.1 Liaison with LBH

Prior to the commencement of works, the Principal Contractor will liaise with LBH to confirm:

- PM<sub>10</sub> and NO<sub>2</sub> Action Levels;
- monitoring regime, sampling locations and frequency; and
- proposed mitigation measures.

#### 6.5.2 Mitigation measures

The following mitigation measures (recommended by RSK) will be implemented by the Principal Contractor at all times to reduce and manage emissions from Site activities and minimise disruption / nuisance to neighbouring occupiers. The Principal Contractor will ensure that the correct dust suppression equipment (i.e. a bowser) is installed on Site prior to the commencement of works.

- if feasible, retrofit additional abatement technology to NRMM equipment, such as Diesel Particulate Filters:
- implement a no idling policy;
- avoid hydrocarbon powered generators, opt for mains or battery alternatives where possible; and
- implement fixed speed limits with accompanying signage on the site. 15 miles per hour (mph) on surfaced routes and 10mph on all unsurfaced areas. Longer haul routes may allow for increased speeds if additional mitigation measures are implemented and agreed with LBH.



Demolition stage management controls to prevent the release of dust entering the atmosphere and / or being deposited on nearby receptors will include:

- avoid explosive blasting, using appropriate manual or mechanical alternatives;
- bag and remove any biological debris or damp down such material before demolition;
- ensure effective water suppression is sued during demolition operations. Handheld sprays are more
  effective than hoses attached to equipment as the water can be directed to where it is needed. In
  addition high volume water suppression systems, manually controlled, can produce fine water droplets
  that effectively bring the dust particles to the ground; and
- soft strip inside buildings before demolition (retaining walls and windows in the rest of the building where possible, to provide a screen against dust).

#### 6.6 Documentation

The following documentation will be held on file on the Site:

- dust monitoring sheets detailing regular monitoring audits (see example in Appendix B);
- a log of visual inspections of the Site during the works;
- a schedule of plant on site detailing NRMM compliance;
- a log of exceedances / complaints with source and details of corrective action taken; and
- RSK Air Quality Assessment (report number 44238-01 (01)).

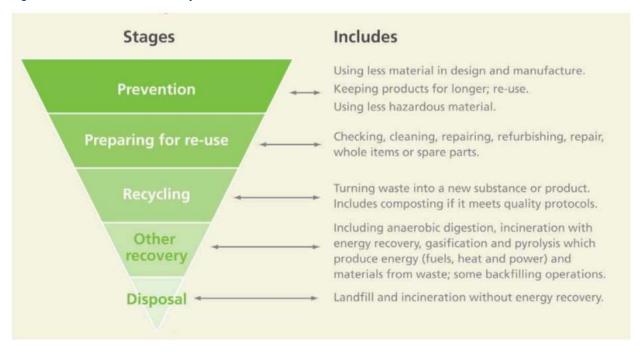


# 7. Demolition Waste Management Strategy

#### 7.1 Introduction

Waste minimisation and management (WMM) should follow the principles of the waste hierarchy (shown in the figure below). The waste hierarchy is set out in national planning policy. In the first instance, finding ways to reduce waste generation. Where this is not possible, materials should be reused and recycled. Following the waste hierarchy is supported by LBH planning policy.

Figure 2: The waste hierarchy:



Source: LBH Sustainable Design and Construction SPD 2013

The Principal Contractor will be responsible for ensuring the relevant documentation is completed and held on Site. Staff are also responsible for adhering to the requirements of the following procedure.

An outline Site Waste Management Plan (SWMP) was prepared by Waterman in May 2022. Waterman assessed the anticipated quantities of waste generated from the demolition, excavation, and construction phases of the development and outlined appropriate WMM measures and targets.

The assessment also recommended that the Principal Contractor would review the SWMP on at least a monthly basis. The project's WMM and recycling rates need to be periodically checked against the needs of the project. The SWMP also suggests that the following quantities be recorded:

- waste reused;
- recycled;
- recovered;
- incinerated; and
- · landfilled.

The Principal Contractor will be expected to develop the outline SWMP as the project progresses.



More information about WMM can be found in the Applicant's outline SWMP presented elsewhere in the planning application.

## 7.2 Relevant Legislation and Guidance

- Environmental Protection Act 1990;
- Waste (England and Wales) Regulations 2011;
- List of Wastes (England) Regulations 2005;
- Hazardous Waste (England and Wales) Regulations 2005;
- Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations 1991;
- Environmental Permitting (England and Wales) Regulations 2016, as amended;
- Clean Neighbourhoods and Environment Act 2005;
- National Planning Policy Framework 2021;
- National Planning Policy for Waste 2014;
- · Waste Management Plan for England 2021;
- London Plan 2021;
- Resources and waste strategy for England 2018;
- Institution of Civil Engineers (ICE) Demolition Protocol 2008;
- CL:AIRE Definition of Waste: Development Industry Code of Practice (DoW CoP)<sup>3</sup>;
- waste management guidance<sup>4</sup> produced by government bodies including Department for Environment, Food & Rural Affairs (DEFRA), the Environment Agency, and Ministry of Housing, Communities & Local Government: and
- LBH Sustainable Design and Construction SPD 2013.

To assist in achieving best practice, the Principal Contractor will consider the following initiatives / guidance:

- Waste Resources Action Programme (WRAP) guidance documents including:
  - "Procurement guidance for construction: Setting a requirement for Waste Minimisation and Management";
  - "Practical Solutions for Sustainable Construction: Achieving Good Practice Waste Minimisation and Management"; and
  - "The Demolition Protocol: Aggregates Resource Efficiency in Demolition and Construction".
- Waste Exchange Network, an online notice board where local recyclers advertise the availability of various types of waste and companies can search for required materials<sup>5</sup>; and
- BRE's SmartWaste reporting tool.

<sup>3</sup> CL:AIRE, Definition of Waste Code of Practice, available from <a href="https://www.claire.co.uk/projects-and-initiatives/dow-cop">https://www.claire.co.uk/projects-and-initiatives/dow-cop</a> (accessed October 2022).

<sup>&</sup>lt;sup>4</sup> UK Government guidance, "Environmental Management: Waste", available from https://www.gov.uk/topic/environmental-management/waste (accessed October 2022).

Waste Exchange Network, available from <a href="http://www.wastechange.com/cgibin/freexchange.cgi?gid=100273&search=london">http://www.wastechange.com/cgibin/freexchange.cgi?gid=100273&search=london</a> (accessed October 2022).



#### 7.3 Procedure

In the following measures and procedures, the Applicant recognises opportunities to reduce the use of natural resources through detailed design processes, procurement, and construction. They will apply to all phases of the works.

#### 7.3.1 Procurement

The Applicant will ensure its Principal Contractor is aware of appropriate WMM measures through the tendering and contract processes. It will ensure drawings are adequately specified and dimensioned so that accurate quantities of materials can be ordered.

Communication with suppliers will be undertaken to reduce over-ordering, return reusable packaging, and return surplus materials (e.g. plasterboard) where possible.

# 7.3.2 Demolition waste disposal

Waste disposal will be minimised as much as possible in line with the waste hierarchy.

Any waste to be disposed of to landfill requires pre-treatment. Pre-treatment must be a physical, thermal, chemical, or biological process (including sorting on Site) that changes the characteristics of the waste to reduce its volume, reduce its hazardous nature, facilitate its handling, and enhance its recovery.

Mixing hazardous waste, including mixing different types of hazardous waste or mixing hazardous waste with other waste substances, is prohibited under the Hazardous Waste Regulations 2005. Wastes that have been mixed must be separated whenever possible.

All potentially hazardous materials will be clearly labelled and removed by a licensed waste contractor.

#### 7.3.3 Excavation

The outline SWMP identified that approximately 60,000m³ of waste comprised of capping hardcore, tarmac, topsoil, soil and sub-base may arise from the demolition and excavation works. The majority of this material (approximately 46,000m³) has the potential to be reused elsewhere on the Site. The remainder (approximately 14,000m³) will require removal from the Site.

A waste classification assessment should be carried out when the extent of excavation (and so waste arising) is established. This should minimise the volume of hazardous waste excavated and maximise opportunities for reuse or recovery.

A materials management plan (MMP) should be prepared if excavated material is to be reused. A MMP details the type, volume, and quality of material. It should be submitted to a suitably qualified person for review. Then the project can be declared to CL:AIRE. A verification report is needed at the end of the project to confirm compliance with the MMP.

# 7.3.4 Material reuse opportunities

The anticipated demolition of 36 buildings is predicted to generate approximately 22,782 tonnes of waste, according to the SWMP and a pre-demolition audit prepared by Reusefully Ltd. This waste includes brick, concrete, metal, plaster and timber products. Opportunities to reuse these materials in the local area will be investigated before disposal.

Reusing construction materials on Site will be guided by the BRE's SmartWaste toolkit (or similar).



The Principal Contractor will contact LBH to notify them of any materials requiring disposal or raise the presence of such materials at working groups. Contacting other developers in the area to collect such materials (thus reducing vehicle trips and mileage) will be encouraged.

## 7.4 Sustainability Targets

As part of its BREEAM assessment, the Applicant aims to divert at least 90% of demolition waste from landfill.

These targets will be refined by the Principal Contractor in due course.

#### 7.5 Documentation

The following documentation will be completed and held on Site by the Principal Contractor:

- · details of any targets for waste minimisation and recycling;
- details regarding the quantities of waste produced, reused, recycled, and sent to landfill (or other disposal);
- a record of all waste received or transferred (previously known as a Waste Transfer Note (WTN) a term still in common usage);
- · hazardous waste consignment notes;
- waste carriers' registration licences;
- environmental permits and licences for disposal sites;
- the outline SWMP; and
- · the pre-demolition audit.

It is noted the Principal Contractor is no longer required to register with the Environment Agency as a hazardous waste producer if they produce more than 500kg of hazardous waste per year at the Site. This change was made by a 2016 amendment to the Hazardous Waste (England and Wales) Regulations. In the place of the former six-digit premises code, the first six letters of the organisation's name are to be included on consignment notes.

#### 7.5.1 Waste transfer notes and hazardous waste consignment notes

Records of transfers of waste will be kept for at least two years. Hazardous waste consignment notes will be retained for at least three years.

This documentation must include:

- an accurate description of the type, quantity, and containment of waste;
- the European Waste Catalogue (EWC) code; and
- details of the waste carrier, who must be licensed. Sufficient information must be provided to ensure that the waste disposal operator is aware of the potential hazards of the substance.

The Principal Contractor will also ensure that returns for consignment notes are collected and retained.



# 8. Community Engagement and Management of Complaints

#### 8.1 Introduction

This section addresses neighbour and community liaison during the works. The Principal Contractor is responsible for ensuring compliance with the below. In addition, all staff are responsible for adhering to its requirements.

## 8.2 Relevant Legislation

- Clean Neighbourhoods and Environment Act 2005;
- Environmental Protection Act 1990, Part 3: Statutory Nuisance;
- · Control of Pollution Act 1974; and
- Localism Act 2011.

#### 8.3 Procedure

#### 8.3.1 Prior to works commencing

Prior to commencement of the works, the Principal Contractor will contact relevant teams within LBH to agree the scope of the community liaison strategy. Information to be provided will include:

- details of the Site and the Principal Contractor;
- Site plans;
- programme duration of proposed works;
- any neighbours who may be affected by the works e.g. residents, offices, places of worship;
- working methods and protective measure to control dust, noise, and vibration;
- · environmental monitoring regimes;
- identification of receptors and liaison strategy;
- plant and equipment to be used and level of noise they produce;
- number of major demolition projects near the Site; and
- the existing ambient noise and dust / air quality levels.

The Principal Contractor will appoint a liaison Manager to liaise with LBH, local residents, businesses, and other affected parties.

#### 8.3.2 During the works

The Principal Contractor or its Liaison Manager should keep regular communication with the local community and businesses nearby of the Site progress and upcoming works. The local community should be made aware of:

- location of the planned works;
- type of works which are anticipated to give rise to effects on residents in the vicinity;
- the duration of the works;
- working hours;
- · the anticipated effects of the planned works;



- proposed mitigation measures;
- · contact details for enquiries; and
- · complaints procedure.

During the works, communication with neighbours will be maintained via notice boards on hoardings. The notice boards will display:

- contact details for key personnel, including the Principal Contractor's full-time contact for the public / LBH. The contact will be available for sharing information, registering a complaint, or requesting action;
- company details, contact addresses, names, and telephone numbers for who to contact in an emergency;
- · a complaints procedure for the public;
- up-to-date information on the Site programme and progress; and
- all relevant licences.

Where practicable, neighbours and local residents will be specifically informed about any upcoming abnormal / disruptive work or road closures. The Principal Contractor will give as much notice of these events as possible.

#### 8.3.3 Complaints

In the event of a complaint (e.g. from a neighbour, a member of the public, LBH) in relation to any on Site activities, a record will be made in a designated logbook. The record will detail:

- the nature of the complaint;
- the cause; and
- where appropriate, the remedial action taken.

Staff / contractors will immediately notify the Principal Contractor should they receive any complaints.

Complaints about odour, noise, dust, or vibration will be addressed directly by the Principal Contractor. The complaint will be reviewed and where appropriate immediate actions employed to rectify the problem.

All complainants will be contacted by the Principal Contractor or their representative for further discussion. If the problem persists, the Principal Contractor endeavour to identify a mutually acceptable resolution with the complainant.

Where a valid grievance is raised, measures will be put in place, where practicable, to avoid recurrence of the complaint. If significant issues arise, a Construction Working Group will be established.

The Principal Contractor will provide regular updates to the Project Manager with regard to complaints received and subsequent resolutions.

#### 8.4 Documentation

All complaints will be recorded in the logbook with details of remedial action taken. The logbook will be held in the Site office, available for inspection by LBH during working hours.



# 9. Noise and Vibration Management

#### 9.1 Introduction

This section applies to the management of noise and vibration during the demolition works. All staff are responsible for complying with the requirements below.

The Considerate Constructors Scheme (CCS) states: noise from plant, vehicles, and radios should be kept down; noise including that from the loading of skips should be suppressed using baffles or sound-deadening quilts; and the use of radios should be moderated, with the volume maintained at a reasonable level.

A noise and vibration assessment was prepared by Cass Allen in 2021 as part of the Environmental Statement in support of the planning application. The scope of the assessment included:

- noise and vibration impacts of the demolition and construction phases;
- noise emissions of fixed plant on the Site;
- noise levels, both internal and external, within occupied areas; and
- the vibration impacts of the adjacent overground railway line.

The significance of noise impacts depends upon a number of factors, including:

- the noise level:
- the nature of the noise;
- the time at which the noise occurs;
- whether the noise is temporary or permanent;
- whether the impact is a result of a new source, or whether it is a change to an existing source; and
- · the sensitivity of the receptor.

Baseline noise and vibration standards have been set to ensure all sensitive receptors are protected. Procedures for the controlling the impacts of noise and vibration are described below.

# 9.2 Relevant Legislation and Guidance

- Section 72 of the Control of Pollution Act 1974;
- British Standard (BS) 5228-1&2:2009+2014 Code of practice for noise and vibration control on construction and open sites;
- London Good Practice Guide on Noise & Vibration Control for Demolition and Construction;
- Environmental Protection Act 1990;
- Mayor of London's Supplementary Planning Guidance: Sustainable Design and Construction 2014;
- BS 5228 Code of Practice for Noise and Vibration Control on Construction and Open Sites, Part 1: 2009+A1:2014 and Part 2: 2009; and
- Haringey Development Management Plan DPD 2017.

#### 9.3 Baseline Noise and Vibration

A baseline noise and vibration survey was conducted by Cass Allen in May 2022. Full results of the survey were presented in the Environmental Statement Chapter Twelve that accompanied planning application HGY/2022/1833. The survey gathered data from 15 noise monitoring locations. Surrounding



noise levels were dominated by road traffic on St Ann's Road traffic in the north of Site and in the south rail movements were found to be dominant. Vibration levels were found to be dictated by rail movements, while road traffic vibrations proved to be not "perceptible".

The Principal Contractor, once appointed, will implement appropriate noise monitoring programme if necessary and associated management measures based on baseline data, and will continue to update this document throughout the construction phase.

#### 9.4 Procedures

## 9.4.1 Liaison with Local Authority

Discussions will take place with LBH prior to and / or (as the case may require) during construction works regarding the following:

- noise action levels;
- vibration limits:
- noise and vibration monitoring regime;
- noise nuisance; and
- · proposed mitigation measures.

Discussion will relate to the specific works and operations on particular plots / parts of the Site and the relevant context in which such works and operations will be carried out.

### 9.4.2 Mitigation measures

Cass Allen recommended the following mitigation / enhancement measures during the works:

- introducing physical barriers / acoustic enclosures;
- using quieter plant; and
- carrying out noisier activities farther from noise sensitive receptors.

Further measures, if necessary, will be added to this document by the Principal Contractor in due course.

#### 9.5 Documentation

The following documentation will be held on file on Site:

- noise and vibration monitoring data and monitoring sheets (see example in Appendix B);
- · details of all complaints received;
- · details of corrective action taken if complaints are received, or excessive noise is identified; and
- information regarding plant maintenance.



# 10. Water Management and Pollution Control

#### 10.1 Introduction

This section summarises measures to be taken during demolition in relation to public safety, emergency and other unplanned activities.

As a best practice measure, the Principal Contractor will implement pollution prevention policies and procedures on site in accordance with Pollution Prevention Guidance 61 (PPG6): Working at construction and demolition sites. It is understood that this document was withdrawn in December 2015 but it is still considered to be best practice. The Pollution Incident Response Plan will be prepared by the Principal Contractor.

The Environment Agency's (EA) Flood Map for Planning indicates that the Site is predominantly located within Flood Zone 1, denoting a low probability of flooding from tidal and fluvial sources (less than 0.1% annual probability).

A Flood Risk Assessment and Drainage Strategy Report was prepared by Price & Myers in May 2022 in support of the planning application. The assessment found that, as the Proposed Development does not include any basement levels, risk of ground water contamination was considered to be very low. In terms of surface water flooding, Price & Myers was able to conclude that based on the EA's indicative Surface Water Flooding Map the majority of the site was at 'very low' risk of flooding (less than 0.1% annual probability). The remainder of the Site was shown to be of 'low' risk of flooding (less than 0.1% annual probability).

Pollution incident control procedures applies to public safety, emergency and other unplanned activities during the demolition works. All staff are responsible for complying with the requirements of the procedure.

As a best practice measure, the Principal Contractor will implement pollution prevention policies and procedures on Site in accordance with Pollution Prevention Guidance 61 (PPG6): Working at construction and demolition sites. It is understood that this document was withdrawn in December 2015, but it is still considered to be best practice. The Pollution Incident Response Plan will be prepared by the Principal Contractor.

### 10.2 Relevant Legislation and Guidance

The works will be carried out in compliance with relevant legislation and with due adherence to relevant guidance. The following are of specific relevance to water management and pollution control:

- Environmental Protection Act 1990;
- Water Framework Directive and Water Environment (Water Framework Directive) (England and Wales) Regulations, 2003;
- Water Industry Act 1991, as amended;
- Environmental Permitting (England and Wales) Regulations 2016;
- Control of Pollution (Oil Storage) (England) Regulations 2001, as amended;
- EA Pollution Prevention Guidelines General Guidance to the Prevention of Water Pollution (PPG01) 2013 (these were withdrawn by the EA in December 2015 but are still considered best practice);
- BS 6031:2009: Code of Practice for Earthworks;
- Environmental Damage (Prevention and Remediation) Regulations 2015;
- Land Drainage Act 1991;



- Health and Work etc Act 1974, as amended;
- PPG6: Working at construction and demolition sites (withdrawn in 2015 but remains good practice);
- National Planning Policy Framework 2021; and
- LBH's Development Management Development Plan Document.

## 10.3 Potential and Impacts

Contaminants associated with the works could include:

- chemical e.g. fuels, oils, lubricants and cleaning chemicals; and
- physical e.g. dust, silts, and sediments.

Potential sources and pathways of pollution from demolition may include:

- · incorrect disposal of Site effluent;
- pollution of groundwater or surface water through chemical, oil, and fuel spills;
- runoff entering watercourses from:
  - exposed ground, excavations, material stockpiles, tracks, and haul routes;
  - recently reinstated areas (road verges, etc.); and
  - areas of disturbed excavated materials.
- pumping of standing water required for drainage management purposes;
- plant washing and vehicle wheel wash areas;
- fuel and chemical storage / refuelling areas;
- · leaking / vandalised plant and equipment;
- sewage and wastewater from temporary construction compound(s);
- pollution of groundwater or surface water due to unforeseen contamination; and
- increased vertical contamination percolation following removal of hardstanding.

### 10.4 Pollution Incident Response Plan

A Site Pollution Incident Response Plan will be developed by the Principal Contractor. This Plan will detail the events and levels that constitute an incident requiring an emergency response and the procedures for dealing with it.

The Plan will include:

- identification of staff responsible for implementing environmental management and emergency response;
- instructions for using emergency response spill kits and sediment control materials;
- detailed procedures for the response to an incident and the personnel responsible for their implementation;
- plans of all sources of potential pollution such as refuelling areas and chemical storage areas;
- summary and plans of local environmental sensitivities, e.g. watercourses, water dependent habitats, designated habitats and water users;
- location(s) of spill kits and other pollution control or emergency response equipment; and
- a summary sheet of procedures and key contact details, which will also be displayed at prominent locations / on all machinery around the Site.



The Plan will be communicated with all Site staff as follows:

- the distribution of key contact details for those responsible for implementing the Plan;
- training in environmental incident and response procedures;
- making them aware of environmental risks and what to do in the event of a spillage;
- instructions for using safety equipment (which will be included in Site inductions), including recovery from incidents.

All vehicles on Site will be fitted with oil spill kits. Vehicles delivering hydrocarbons will be fitted with oil spill kits and sand trays will be placed below any oil of fuel filling activities. Spare oil spill kits will be held in the Site office at all times.

The Principal Contractor's Site Manager will have overall responsibility for:

- ensuring all emergency procedures are understood by all Site staff and sub-contractors;
- preparations for, and reports of, any incidents are fully documented and reported to the Site Manager;
   and
- the Site Manager is fully briefed regarding the arrangements, including making available current inventories of all safety-related equipment held on Site.

#### 10.5 Procedures

The Principal Contractor will prepare plans showing all watercourses, potential sources of pollution, and drainage within (and immediately adjacent to) the Site.

Runoff should not discharge to any ditches, watercourses, drains, sewers, or soakaways without an agreement with the appropriate authority. All contractors will be responsible for ensuring appropriate authorisations are in place and that copies of the consents from EA and Thames Water are kept on Site.

All redundant pipework should be sealed off before works commence and filled with a suitable material, such as cement grout, to prevent any rodent infestations or possible subsidence.

An inventory of potential pollution sources and details regarding the management of these sources will be documented by the Principal Contractor. The inventory will be updated as works progress.

The Principal Contractor will establish a spill control procedure as part of its operating procedures, which will be adhered to in the event of a spill.

Incidents that will be reported to the Principal Contractor include:

- spillages of chemicals, oils, fuels, unplanned or non-consented discharges;
- · release of fumes and gases; and
- any incident that could lead to enforcement action from LBH or any other regulatory body, public complaint or media attention.

In the event of a spillage or other pollution incident, the Principal Contractor will be notified immediately and will take immediate steps to prevent environmental pollution, for example:

- protection of drains following a spillage of oil or other chemical;
- · use of spill kits following a spillage of oil or other chemical; and
- turning off equipment or other source of fumes, noise, or dust.



A suitable number of spill kits will be kept on Site in the vicinity of the work in progress and areas of hazardous material storage. As a minimum, spill kits should contain absorbent granules, sandbags, and drain covers. Where possible, absorbent pads and booms will be used instead of granules and sandbags.

Used spill kits must be disposed of appropriately (e.g. as hazardous waste) where relevant.

If it is considered that a fugitive release to air, water or ground may have occurred, the following action will be taken:

- ensure that it is safe to remain in the area:
- locate and switch off any isolation switches, valves or pumps if possible;
- contact the following bodies where appropriate and follow their instructions:
  - Environment Agency 0800 80 70 60;
  - London Fire Brigade 999 (emergencies) 020 8555 1200 (non-emergencies); and
- where possible, damage control measures will be undertaken to prevent dispersion of gases or
  pollution from entering drains or water courses. For example, create containment sumps, pump liquid
  to temporary storage areas (such as lined skips), and block or clear drains as appropriate.

The Principal Contractor will prepare measures to prevent incidents and damage to services during excavations, tunnelling, or other activities. These may include:

- monitoring of groundwater quality and water levels;
- information regarding emergency procedures to deal with any water contamination arising from the works, including the provision of spill kits;
- ensuring any storage of oil-based materials, including petrol, diesel and above ground fuel and oil storage tanks, comply with the Control of Pollution (Oil Storage) (England) Regulations 2001 as amended;
- maintaining stationary plant to ensure no leakages of oil or fuel and any secondary containment measures do not overflow; and
- providing a suitable site drainage system, including pollution cut-off valves, with suitably sized treatment facilities.

## 10.6 Documentation

A log of environmental incidents and remedial actions taken will be maintained on Site and held by the Principal Contractor.

Copies of liaison with the regulator(s) in the event of an incident will be retained on Site.

The following should also be retained / developed:

- a Pollution Incident Response Plan for any pollution events / spills;
- an inventory of pollution sources associated with construction and specific pollution prevention;
- · health and safety risk assessments; and
- a programme for drills (desktop and practical dependant on the risk).
- copies of environmental permits / discharge consents;
- copies of effluent monitoring records (if required by any discharge consent);
- copies of water monitoring data and visual inspections where relevant;
- drainage management plan(s), kept up to date as works progress;



- an environmental incident logbook for use in the event of a pollution incident. Should a pollution incident occur, appropriate notification to the EA / Thames Water will take place and a record of the incident will be maintained in an environmental incident logbook by the Principal Contractor; and
- copies of liaison with the regulator(s) in the event of an incident.



# 11. Archaeology and Built Heritage

The measures set out in this section aim to control and limit potential impacts on archaeology in accordance with relevant legislative requirements and accepted industry practice. Works within the scope of this DEMP include ground works below the current basement slab.

The Site is not located within an Archaeological Priority Area and does not have any nationally significant heritage assets.

RPS produced an Archaeological Desk-Based Assessment (ADBA) for the Site in March 2022. This assessment found there was a low potential for finding prehistoric, Roman or Anglo-Saxon remains. It was also indicated that there is moderate archaeological potential for Medieval, Post Medieval, concentrated in the northern part of the Site. Any archaeological assets present on site were deemed likely to be of local or low importance.

Turley prepared a Built Heritage Statement for the Site in March 2022. The assessment found that a northern portion of the Site falls with the St Ann's Conservation Area. The Conservation Area contains the Grade II\* listed Parish Church of St Ann, and Grade II listed buildings including St Ann's Church School. The Site itself does contain a locally listed building, 'Mayfield House'.

Turley did not expect the works to cause any significant effects due to their temporary nature. Overall impacts to the St Ann's Conservation Area are estimated to be "less than substantial" under the National Planning Policy Framework (NPPF) definition.

## 11.1 Potential Impacts

Potential impacts from enabling and construction works to built heritage include:

- · indirect impacts on designated heritage assets as a result of changes to their setting; and
- impacts to off-site designated heritage assets due to vibration from construction activity (such as piling and demolition).

#### 11.2 Procedure

RPS anticipated archaeological mitigation measures would be required to reduce works impacts. These could include:

- a programme of historical building recording to complete the work previously undertaken on hospital buildings to the east; and
- programmes of archaeological monitoring works focussed on undeveloped areas of the Site and the location of Medieval and Post Medieval buildings within the northern Site boundary.

These measures will be agreed with LBH as required.

#### 11.3 Documentation

Records of any archaeological mitigation measures agreed with LBH will be held on Site.



# 12. Management of Soil Contamination

#### 12.1 Introduction

A Contaminated Land Investigation Report prepared by IDOM in May 2022 deemed the Site to represent a moderate risk in relation to contaminated land. IDOM's report included a review of available historical, geological, and hydrogeological sources, a summary of consultation with the regulatory authorities, observations made during a Site walkover, and results of an intrusive exploratory investigation. IDOM's investigation found asbestos (fibres and fragments), arsenic, and lead within Made Ground / topsoil on Site.

Without mitigation measures, IDOM considered there to be the potential for construction / demolition workers to come into contact with contaminated soils and dusts.

# 12.2 Relevant Legislation and Guidance

- Environmental Protection Act 1990 Part IIA;
- Environmental Damage (Prevention and Remediation) Regulations 2009, as amended;
- Contaminated Land (England) Regulations 2006, as amended;
- Contaminated Land Statutory Guidance 2012;
- Building Regulations 2000;
- Environmental Permitting (England and Wales) Regulations 2016;
- COSHH Regulations 2002;
- Health and Safety Executive (HSE) Guidance Note EH40/2005 Workplace Exposure Limits, as amended: and
- National Planning Policy Framework 2021.

#### 12.3 Procedures

IDOM concluded that potential risks to construction / demolition workers from contaminated soils could be managed through the implementation of remediation measures. Remediation activities recommended by IDOM included:

- carefully decommissioning the existing heating system which was found to contain asbestos fibres and fragments;
- · removal of concrete structures, sub surface structures and old infrastructure; and
- removal of heavily contaminated soils.

Measures to protect construction / demolition workers will include:

- keeping dust levels within statutory limits (to be agreed with LBH);
- construction workers wearing appropriate personal protective equipment (PPE) at all times; and
- strict adherence to appropriate health and safety procedures at all times to be developed by the Principal Contractor.

## 12.4 Monitoring

IDOM recommended implementation of an EA approved monitoring program that includes asbestos and dust monitoring at the perimeter of the Site.



According to IDOM, the Site has not been subject to extensive remediation to the satisfaction of LBH. Therefore, there is potential for contamination to be encountered during demolition. The following strategy will be followed if unforeseen contamination is discovered:

Report to Site Manager

Environmental Consultant Notified

Environmental Consultant attends site to assess

Determine Remedial Action

Regulatory Approval

Remediate

Figure 3: Discovery strategy for unforeseen contamination

Source: Figure 1 of IDOM's Contaminated Land Assessment, report reference CLA-21914J-22-151, dated May 2022.

### 12.5 Documentation

The following documentation will be held on Site:

- a log of environmental incidents and remedial actions;
- relevant approvals from LBH; and
- IDOM Contaminated Land Assessment, CLA-21914J-22-151, May 2022.



# 13. Environmental Auditing and Verification Monitoring

#### 13.1 Introduction

Regular environmental audits will be undertaken by the Principal Contractor (or by a suitably qualified environmental consultant on their behalf) to ensure that the requirements of this DEMP are being implemented. The frequency of the audits will be dependent upon the potential for the works being carried out to give rise to environmental impacts but are generally anticipated to be once every two to four weeks during the main phases of development.

The audits will include a Site inspection and a review of documentation. Audits will be recorded on a Site record sheet (or similar), an example of which is presented in Appendix B. This will include a review of inhouse auditing. Non-conformances will be reported to the Principal Contractor's environmental manager with a deadline for remedial action, where necessary. Dust, vibration, and noise monitoring will also be undertaken in accordance with the procedures outlined in sections 6 and 9 above, and as agreed with LBH.

An Environmental Site Champion will be appointed by the Principal Contractor to promote sustainability and best practice in environmental management.

#### 13.2 Environmental Reviews

Environmental issues will be included as an item on the agenda at Progress Meetings, attended by the Principal Contractor, Sub Principal Contractors, relevant Trade Principal Contractors, and other members of the Project Team where appropriate. Where relevant, the following should be discussed:

- · results of monitoring;
- complaints, including cause and remedial action;
- neighbourhood liaison;
- · communications with LBH and other statutory bodies; and
- incidents and near misses that have taken place.

## 13.3 Documentation

The following documentation will be retained on Site for inspection as indicated in the previous sections of the DEMP:

- complaints logbook with details of the response made to complaints received;
- noise and vibration monitoring record sheets with details of corrective actions taken where the action levels are exceeded;
- · dust monitoring records;
- plant maintenance and defect records;
- details of waste recycling targets and records;
- records of quantities of waste produced, reused, recycled, and disposed of to landfill (or other disposal);
- waste transfer notes, hazardous waste consignment notes, and waste carriers' registration(s);
- copies of Environmental Permits, discharge consents, and licenses;
- · results of any water quality testing; and
- environmental incident logbook containing details of environmental incidents and corrective action.



# **APPENDICES**

# A. Plans and Drawings

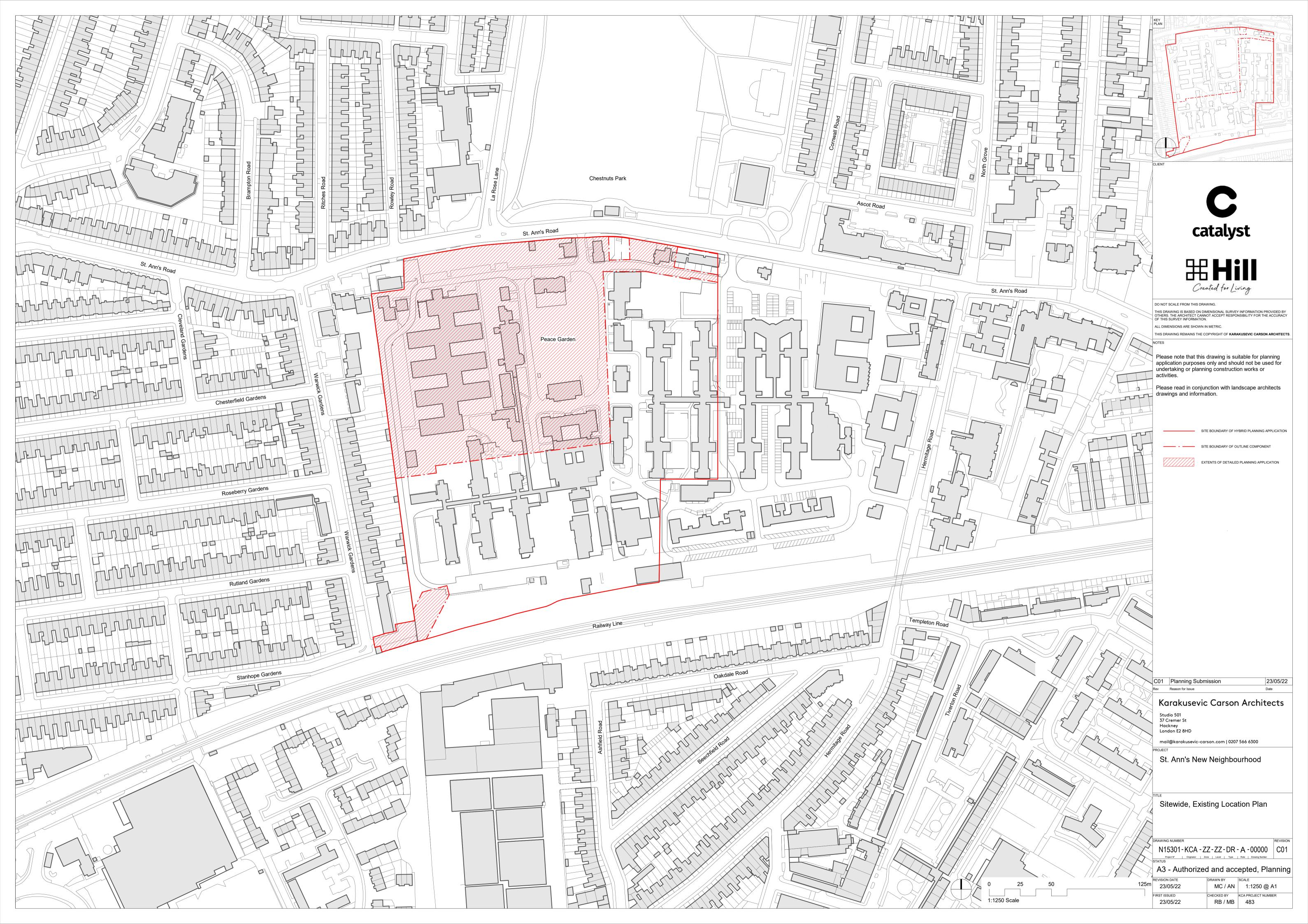
Karakusevic Carson Architects drawing titled "Sitewide, Existing Location Plan", drawing number N15301-KCA-ZZ-DR-A-00000 revision C01 dated 23 May 2022.

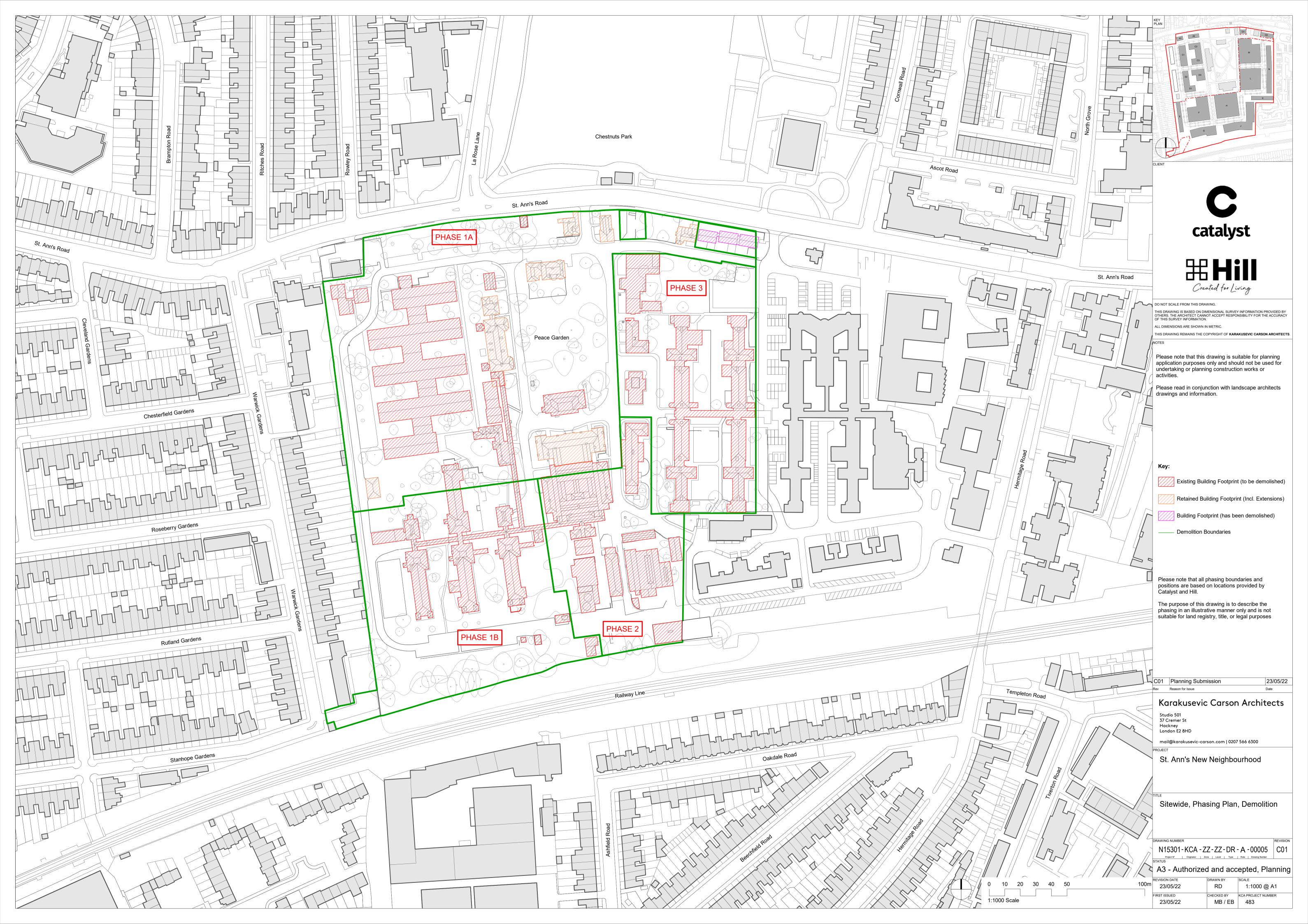
Karakusevic Carson Architects drawing titled "Sitewide, Phasing Plan, Demolition", drawing number N15301-KCA-ZZ-ZZ-DR-A-00005 revision C01, dated 23 May 2022.

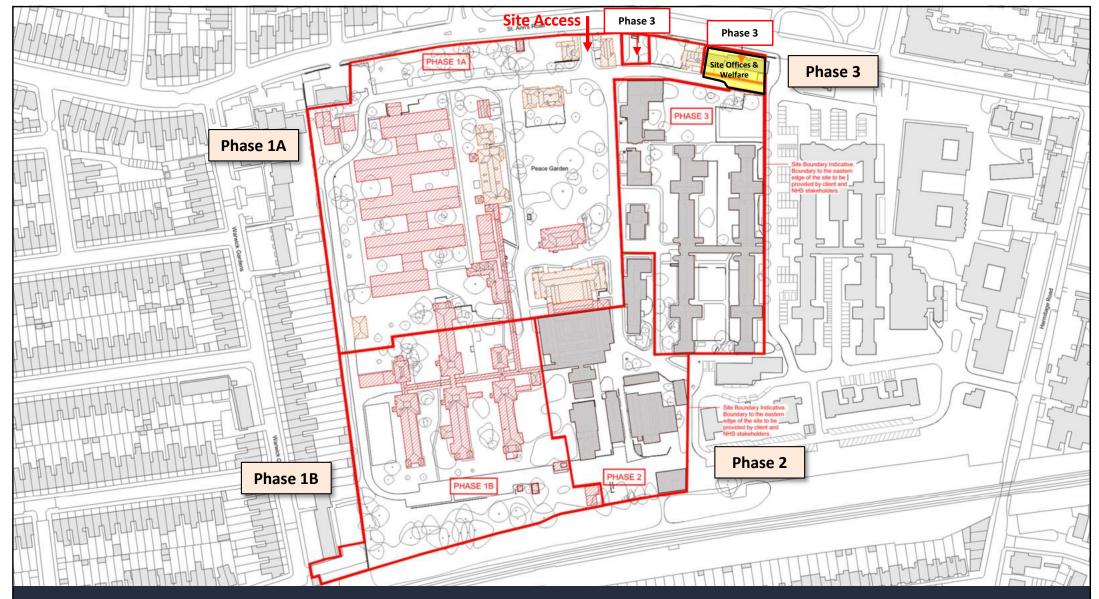
Page 8 from Hill's "Logistics Pack" document with electronic file reference "PLN05 - St Ann's - Logistics Pack - 20.09.22" dated 20 September 2022 – Phase 1a and 1b demolition.

Page 12 from Karakusevic Carson Architects document titled "St Ann's New Neighbourhood: Design Code" with reference N15301-KCA-XX-XX-RP-A-00003 dated 6 October 2022 – Site Wide Retained Buildings.

Page 20 from Karakusevic Carson Architects document titled "St Ann's New Neighbourhood: Design Code" with reference N15301-KCA-XX-XX-RP-A-00003 dated 6 October 2022 – Tree Strategy.









St Ann's Hospital Phase 1A & 1B Demolition



# 2.2 Site Wide - Retained Buildings

This section of the Design Code introduces the existing built heritage features which have informed the spatial layout of the masterplan.

It sets out clauses that ensure new streets and buildings are set out to enhance and frame views of these buildings, which become focal points in the masterplan.



#### **Tree Strategy**

- 3.1.21 The soft landscape character of the site **should** be considered as a whole, with existing trees forming an important aspect of site heritage and understood as a defacto arboretum. Existing and newly planted trees **should** form a coherent collection of trees but diverse, in species, character and maturity.
- 3.1.22 Existing tree removals must be kept to a minimum, with trees removed only where necessary to enable construction of buildings or to enable unavoidable site level works.
- Site boundary

  Site boundary

  Site boundary

  Existing tree not included in Arboricultural Survey, location shown indicatively, to be survey, location survey, lo



fig. 3.4 / Existing and retained trees plan



# B. Site Review Record Sheet

FORM A	: SITE	REVIEW	RECORD	SHEET

(To be completed in conjunction with Form B)

Date of visit:

Time:

Name of person undertaking visit:

### **Checklist:**

Issue	Observation	Required Action (numbered)
General		
What activities are currently being undertaken at the Site?		
Does the Site appear clean and tidy from the outside? Including hoarding, viewing apertures, entry points, pedestrian signs, pavement ramps etc.		
Can all road signs / names be seen?		
Is the reception clearly signed and does the receptionist know how to deal with unexpected visitors? Were you escorted to the person you are visiting?		
Is the Site clean and tidy internally?		
Are all Site facilities within the Site boundary?		
Are Site operatives using the correct rest facilities (ie not congregating in public areas?)		
Are Site operatives aware of the Site Environmental Policy and how it relates to them?		
Are Site operatives appropriately dressed and is the radio ban being enforced?		
Does the main Principal Contractor operate an Environmental Management System?		



Issue	Observation	Required Action (numbered)
Has the Site registered with the Considerate Constructors Scheme? If yes, what is the target score?		
Does the main Principal Contractor have an environmental materials policy, used for sourcing of demolition materials to be utilised on Site?		
Is floodlighting limited to working hours and shielding in place where light may cause a nuisance?		
Energy / CO <sub>2</sub>		
Are there any energy saving measures in place on Site?		
Is on Site energy use / CO2 produced from onsite energy use being monitored, recorded and reported monthly.  Who is the named individual responsible for this?		
Is the distance travelled by transport to and from the Site being monitored to enable CO2 emissions to be calculated? Is this recorded and reported monthly?		
Public Relations and Community Liaison		
Have any complaints been received from the public or neighbours?		
If so, give details.		
Are gates kept closed and entry points manned?		
Are pedestrian walkways signed and clear of obstructions and allow access for mobility impaired people or people with sight / hearing difficulties?		
Is the vehicle routing both on and off Site being followed?		
Are vehicles queuing to access the Site and are vehicles waiting to enter or leave the Site switched off?		
Is wheel washing and street sweeping being undertaken and is it effective at reducing mud on the roads?		



Issue	Observation	Required Action (numbered)
Water and Wastewater Management		
Is a drainage plan held on Site and methods of preventing silt and oils from entering the drainage system in use?		
Are there any unauthorised discharges?		
Is water use being minimised and monthly water consumption figures being recorded?		
Bulk Chemical / Fuel Storage		
Are liquids stored appropriately i.e. bunded and labelled?		
Is there any evidence of spillages? Are spill kits available?		
Are drip trays being used to fill small containers?		
Are deliveries of fuel and oil supervised and fuelling points protected from vandalism?		
Are there stockpiles of material on Site?  If so, where and are they appropriately stored to prevent damage / theft etc.?		
Waste Management		
What types and quantities of waste are collected on Site?		
Are records being kept to show the amount of waste collected and how much is being reused or recycled?		
Are waste certificates and other documents in order (Hazardous Waste Consignment Notes / Waste Transfer Notes)?		
Air Quality and Odour		
Are lorries sheeted when leaving the Site?		
Are any dust clouds observed? If so, where?		



Issue	Observation	Required Action (numbered)
Have dust action levels been exceeded? If so, give details.		
Have any odour issues been identified? If so, give details		
Noise and Vibration		
Can noise be heard as the Site is approached? If so, where is it coming from?		
Is a sign displayed prominently detailing the Principal Contractor, contact details for complaints etc.?		
Have noise action levels been exceeded? If so, give details		
Have vibration action levels been exceeded? If so, give details		
Have any statutory bodies visited the Site? Council (EHO), Environment Agency, etc.		
Are there any incidents recorded in the environmental incident's logbook?		
Other		
Other observations:		



### FORM B: ENVIRONMENTAL ACTIONS SHEET

(To be completed in conjunction with Form A)

#### For the attention of

(Name of Principal Contractor)

All **actions** arising from the Site visit on are numbered below and should be rectified immediately. Confirmation should be forwarded to the Project Manager **within the time specified** using this form.

Required Action number	Description of how Action has been rectified	To be auctioned within the following timescale

Signed:	Print name:
Date:	

Please forward to the Project Manager



# UK and Ireland Office Locations

