



Construction Environmental Management Plan Audit

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| SITE NAME: | Brixton Hill Project (Olive Morris House) | DATE: | 11.08.21 | TIME: | 09:28 |
| SUMMARY OF WORK: | Principle Contractor is McAleer and Rushe. Foran Construction are subcontractors operating on site. Tying and getting ready for basement slab drainage work. The project is now in Phase 3 of the construction works and all demolition work has now been completed. | | | | |
| SITE CONTACTS: | <ul style="list-style-type: none"> Steve McGinley - Project Manager Jorgie Spicer – Williams SHE Manager Kelly Southion – Community Engagement Manager | WEATHER CONDITIONS: | Sunny, warm and atmosphere was still. | | |
| | | DATE OF NEXT AUDIT: | | | |
| REVIEWED BY: | Becka Bessant | DATE: | 12/08/2021 | TIME: | 16:50 |
| WHAT IS THE NATURE OF THE NEIGHBOURHOOD SURROUNDING THE SITE (SEE BELOW)? | | | | | |
| | | AT FENCE LINE | AT 0.5 KM | AT 1 KM | AT 2 KM |
| INDUSTRIAL | | | | | X |
| COMMERCIAL | | X | | | |
| RESIDENTIAL | | X | | | |
| SCHOOLS | | | X | | |
| HOSPITAL | | | | | X |
| CONTROLLED WATERS (RIVERS/STREAMS/PONDS) | | | | | X |

| PREVIOUS ACTIONS | COMPLETE? | COMMENTS |
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| N/A 1 st CEMP audit that EMS have completed. | n/a | n/a |
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| | Y | N | |
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| SITE CONDITIONS | | | |
| a) Are Complaints dealt with in a timely manor? | X | | Complaints are recorded in the relevant section of the SmartWaste tool. Evidence seen during the audit showed that complaints are recorded and investigated and closed out with 24 hours or less. |
| b) Has the site been registered with Considerate Constructors? Has an audit been carried out? | X | | Yes and had a visit on the 19.01.21 and scored 9/9 for Environment. |
| c) Is the site clean and tidy? | X | | The site was clean and tidy and there was no evidence of any debris on the roads or waste escaping into the environment. |
| d) Are roadways kept clean? | X | | There was no evidence of mud or debris on the roads. Site confirmed that if road sweepers are required they have a contract in place where they can get road sweepers on site straight away. |
| e) Are there are concerns that could lead to a statutory nuisance? | X | | At the time of the audit, noise and vibration, odour, litter and dust were not considered to be a potential nuisance or risk. |
| f) Are chemicals and oils stored in a controlled manner? | X | | Oil and diesel were stored in drums and double bundled. |
| SECTION 8.6 of CEMP: NOISE AND VIBRATION | | | |
| a) Is noise and vibration monitored on a continuous basis/ | X | | Live noise and vibration monitors are installed on site. Their location and limit levels were assessed by Campbell Associates' and agreed with Lambert Council. Live data reports from previous months were sampled for March and April. Alerts are sent to key site personnel where trigger levels have been exceed. Site confirmed that the upper level noise limits have not been exceeded. The noise meters were calibrated on the 15.10.20 and are next due for calibration on the 15.10.22. The vibration meters were calibrated 14.10.19 and is due for calibration 13.10.21 (ref 3585) and 15.10.20 and the next calibration is due 15.10.22. |

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| b) Are there appropriate control measures in place? | X | | Acoustic blankets are installed around the site. Plant can not be left idling and this was verified during the audit. Agreed quiet hours are in place and site do not take any deliveries before 8:00 am and after 5.30pm. All deliveries have to also be pre-booked before coming to site. This system was observed during the audit. There is a neighbourhood Construction Forum and local residents are kept up-to-date via emails and monthly newsletters (10.07.21 sampled) All plant and machinery undergo weekly inspections (evidence seen for excavator for 06.08.21). |
| c) Are site adhering to the Section 61 that has been agreed with the Council. | X | | A section 61 Ref: 20/08006/PLANAP has been in place since 03.09.21. Site are adhering to the requirements of the Section 61, as any noise complaints are investigated and resolved straight away. Example seen for a complaint received on the 20.07.21. The Council are also kept up to date of any changes to work that could have an impact on noise. |
| SECTION 8.7 OF CEMP: AIR QUALITY | Y | N | |
| a) Are site compliant with the Non-Road Mobile Machinery (NRMM) Requirements? | X | | Plant is logged on the NRMM portal and a sample was shown during the audit. 2 x excavators are in use on site and both of these were recorded on the register (ZX135US-6 and ZX210LC-6). GS-W is responsible for keeping the register up-to-date. The concrete pump hasn't been added to the register as site are awaiting confirmation from the supplier on the Type Approval Number (TAN). TAN numbers are checked when accepted onto site to ensure they meet the NRMM requirements. Exempt plant has not been used as there have been no retrofits. An audit was carried out by London Borough of Lambeth on 04.12.20 and site were compliant. |
| b) Is air quality monitored on a regular basis? | X | | Live dust monitors are installed on site. Their location and limit levels were assessed by Campbell Associates' and agreed with Lambert Council. The meters were last calibrated on the 15.10.20 and the next calibration is due 15.10.22. Live data will be reviewed at the next visit. |
| c) Are generators used on site? | n/a | n/a | Generators are not used on site. |

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| d) What other controls are in place to manage air quality? | X | | Site plant speed limit is 5mph. Other road vehicles are not allowed on site. |
| SECTION 8.8 of CEMP: DUST | | | |
| a) Are there dust prevention measures in place where applicable to minimise the amount of dust generated? | X | | There was no dust being generated from site activities at the time of the audit. A dust risk assessment has been produced which outlines what control measures must be adopted. A copy of the risk assessment was observed during the audit. There were no stockpiles observed on site during the audit. |
| SECTION 8.13 of CEMP: DISCHARGES TO WATER | | | |
| a) What discharges occur on site and where? | X | | There are no discharges to water taking place during the current work schedule. |
| SECTION 9 of CEMP: WASTE MANAGEMENT | | | |
| a) Are wastes segregated? What waste streams are produced on site? | X | | Current waste streams generated on site are metal, soil and stones, general waste and empty spray cans |
| b) Are their initiatives to eliminate and reduce waste? | X | | Timber off cuts are used for shuttering, plasterboard is pre-cut off site and also recycled via an authorised waste contractor. Single use lifting slings, once lifted off are sent back to the supplier to be re-used (once they have been re-tested). Site won material was re-used on another project under waste exemption WEX270096 |
| c) Are hazardous wastes stored separately? | X | | Empty spray cans are stored separately and are awaiting a collection. |
| d) Is waste stored securely? | X | | Site is secure and any wastes that could escape into the environment are covered. All skips are netted before they are removed from site. |
| e) Are wastes / materials stockpiled on site? What control measures are in place to prevent pollution of the environment? | X | | There was no evidence of any waste being stockpiled on site. General waste is stored in 2 x 1100 litre bins. |
| f) Are the skips in a good condition (e.g. not corroding, in a poor condition)? | X | | The metal skip appeared to be in a good condition. Other skips were not observed during the audit. |

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| g) Are each of the skips labelled? | n/a | n/a | This was not observed during the audit, but will be addressed at the next site visit. |
| h) Are waste containers on a hard-standing surface? | X | | The metal skip was stored on hardstanding. No other waste bins were seen during the audit. |
| i) Are Waste Transfer Notes (WTN), season tickets and Hazardous Waste Consignment Notes (HWCN) kept on file? | X | | Waste Transfer Notes were kept on file. Hazardous waste has not been removed from site. |
| j) Are WTN and HWCN completed correctly? | | X | <p>Foran Construction (sub contractor) are responsible for appointing the waste contractor to remove muck away on behalf of McAleer and Rushe</p> <p>H. Sivyver (Transport) Ltd ticket number: 2398262 has the following errors:</p> <ul style="list-style-type: none"> • SIC code 43.99 Other specialised construction activities n.e.c. should be 41202 Construction of Domestic Buildings • Site addresses and names must be completed in full <p>Grab Express WTN 27553 had the following errors:</p> <ul style="list-style-type: none"> • SIC code missing • Site addresses and names not completed in full • Time on and off site and quantity not completed <p>Action: Ensure waste contractors are informed of the amendments that are required with the WTN's to ensure compliance with the Waste (England and Wales) Regulations 2011 and Section 34 of the Environmental Protection Act 1990.</p> |

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| k) Are all waste contractor licences kept on file on site? | X | | <p>The following permits and licences were sampled for current waste streams being removed from site:</p> <p>Soil and Stones</p> <ul style="list-style-type: none"> • H Sivyer Transport Ltd WCL: CBDU96919 Expires 04.05.22 • Grab Express Ltd WCL: CBDU223889 Expires 11.02.24 • H Sivyer Transport Ltd Environmental Permit: EPR/LP3395VN for Mordon Wharf and can accept EWC: 17 05 04 • Land Logical Ltd Environmental Permit: EPR/BB3906MD for Cotton Lane and can accept: EWC 17 05 04 <p>General Waste</p> <ul style="list-style-type: none"> • RTS WASTE MANAGEMENT LTD WC:CBDU147974 Expires 27.01.23 • Crossways Recycling Environmental Permit: EPR/KP3698HF/V002 for Plot 15 Manor Way Business Park |
| l)Is waste collected on a frequent basis to avoid any accumulation occurring on site? | X | | Soil and stones are removed once a day and general waste is collected once a week. Other waste stream are collected once the bin is full which is on an ad hoc basis, as these waste streams are not generated as frequently. |
| m) Have 'Duty of Care' checks/ audits been carried out on all waste contractors, e.g. checks on the EA public register? | X | | <p>HO arrange the contracts with the waste contractors and obtain the relevant permits and licences and issues these to site. Site do not carry out any further 'duty of care' checks.</p> <p>Observation: Site to carry out further checks on the EA public register to verify that the appointed waste contractors are registered with the EA. Frequency of these checks is dependant on how often the waste is being removed from site.</p> <p>Site to ensure that the appointed waste contractors are able to accept the waste by cross referencing the EWC code on the waste documentation with the waste contractor permit.</p> |

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| n) Is there a Site Waste Management Plan (SWMP)? Who is responsible for the SWMP? | X | | SWMP is completed via the Bre SMARTWaste Portal. A sample was seen during the audit. Data is inputted by Head Office who keep the plan up-to-date. SM and GS-W are also responsible for the SWMP. |
| o) Is the SWMP kept up-to date, correctly completed and monitored regularly? | X | | The SWMP references staff who left the business 4 weeks ago. Observation: Ensure that the SWMP is updated with correct contact names. |
| p) Are recycled aggregates used on site? Are they compliant with the Aggregate Quality Protocol? Is there evidence of this? If not has a U1 exemption / Environmental permit been applied for? Has a risk assessment been completed? | | X | Recycled 6F2 has been brought onto site by Foran Construction for use on site, but it isn't clear if the material is a waste in compliance with applicable waste legislation or a product in compliance with the WRAP Recycled Aggregate Protocol. Ticket number: 27546 from Grab Express states that the material was a 6F2 but there is no declaration that verifies it was produced in compliance with the WRAP protocol. Action: Determine if the material is a waste or a product and obtain the necessary evidence to verify its status. |
| APPENDIX A OF CEMP: TRAFFIC AND TRANSPORT | Y | N | |
| a) Is the traffic management plan kept up to date? | X | | The traffic management plan is kept up to date. The last amendment was 06/08/21. |
| b) What other environmental controls are in place? | X | | Road sweepers are used to clean roads should any mud be deposited on roads outside the main boundary. Vehicle wheel washers will be deployed where necessary. |

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| TRAINING AND COMMUNICATION | | | |
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| a) Have staff/ contractors received site induction training prior to construction work commencing? | X | | All staff and contractors who attend site receive an induction which includes environmental site rules, waste, spill response, water pollution, storage of chemicals and oils, noise, dust and vibration, contaminated land, ecology and energy use. Subcontractors all commit to a HSE statement which is signed by a director. Example was seen for Foran Construction dated the 04.05.21. |
| MONITORING | | | |
| a) Are regular inspections and audits undertaken? | X | | G S-W carries out weekly site safety reports which includes environmental (i.e. noise, vibration and dust). The report on the 23.07.21 was observed during the audit and no issues had been identified. |
| b) Are incidents reported and actioned? | X | | There have been no environmental incidents which is the company's overall objective. |

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SUMMARY OF FINDINGS AND ADDITIONAL COMMENTS

Following the site visit and the evidence presented at the time of the audit, site are compliant with the CEMP. There are a couple of areas in relation to waste management that require actioning in order to verify compliance with applicable waste legislation.

Actions

Waste Management

- 1) **Ensure waste contractors are informed of the amendments that are required with the WTN's to ensure compliance with the Waste (England and Wales) Regulations 2011 and Section 34 of the Environmental Protection Act 1990. Complete by the 20th August 2021**
- 2) **Determine if the 6F2 is a waste or a product and obtain the necessary evidence to verify its status.**

If the material is a waste ensure that a WTN is used along with a registered waste carrier. Site must be registered under a U1 exemption and cannot accept any more than 5000t of aggregate in 3 years.

If the material is a product then it must be brought to site on a delivery ticket, with a statement stating that it was produced in line with the WRAP protocol. The site that produced the aggregate must also provide evidence of their Factory Control Product System along with other key evidence.

Complete by the 20th August 2021

Observations

- 1) **Site to carry out further checks on the EA public register to verify that the appointed waste contractors are registered with the EA. Frequency of these checks is dependant on how often the waste is being removed from site.**

Site to ensure that the appointed waste contractors are able to accept the waste by cross referencing the EWC code on the waste documentation with the waste contractor permit.

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NOTE: The results, conclusions and recommendations of this report are based solely on-site issues identified at the time of the audit.


INSPECTED BY

Name (caps) Becky Chapman BSc (Hons) MIEMA CEnv

Signature..........

REVIEWED BY

Name (caps) BECKA BESSANT MSc, MCIWM, PIEMA

Signature..........

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