# CONSTRUCTION & ENVIRONMENTAL MANAGEMENT PLAN

Wilberforce House, Wilberforce Way,
Southwater, Horsham, RH13 9RS




for

Legal & General Property Partners

Project No: C5249-21-697

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## 1.0 INTRODUCTION

### *1.1 Background*

This Construction Environment Management Plan (CEMP) details the construction and environmental management to be implemented during the planned demolition works at Wilberforce House, Wilberforce Way, Southwater, Horsham, RH13 9RS ('The Project') under the Planning Permission (ref: DC/22/2077)

This CEMP has been developed to be considered in relation to discharge of Condition 3 of the Planning permission which states:

*No development, including any works of demolition, shall commence for any phase or unit until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall include details of the following relevant measures:*

- *i) An introduction consisting of a description of the construction programme, definitions and abbreviations and project description and location;*
- *ii) Details of how residents will be advised of site management contact details and responsibilities;*
- *iii) Detailed site logistics arrangements (to include details shown on a plan), including location of site compounds, location for the loading and unloading of plant and materials, site offices (including height and scale), and storage of plant and materials (including any stripped topsoil).*
- *iv) Details regarding parking or site operatives and visitors, deliveries, and storage (to include details shown on a plan);*
- *v) The method of access to and from the construction site;*
- *vi) The arrangements for public consultation and liaison prior to and during the demolition and construction works - newsletters, fliers etc;*
- *vii) Details of any floodlighting, including location, height, type and direction of light sources, hours of operation and intensity of illumination;*
- *viii) Locations and details for the provision of wheel washing facilities and dust suppression facilities (to include details shown on a plan).*
- *ix) Details of measures to reduce impacts on biodiversity features.*

*The demolition and construction shall thereafter be carried out in accordance with the details and measures approved in the CEMP.*
*Reason: As this matter is fundamental in order to consider the potential impacts on the amenity of nearby occupiers and highway safety during construction and in accordance with Policies 33 and 40 of the Horsham District Planning Framework (2015).*

This document, along with associated management plans and method statements, addresses the responsibilities and management of the conditions that are pertinent to the works.

This CEMP is a live document that will be reviewed periodically by City Demolition and the Client's project team to reflect the progress of the works, any changes in environmental requirements and to account for any emerging best practice or updates (either from statutory bodies or client / contractor best practice). If any changes are required during the lifetime of the Project that could potentially result in significant effects greater than those identified in the baseline environmental reports the consultation will be undertaken prior to any changes being invoked, as this may require consultation with the Local Planning Authority (LPA).

City Demolition will ensure that all conditions set within Planning Permission are understood, communicated and followed at all times during the Project. Breaching planning conditions could result in enforcement action, leading to delays and possible financial penalties.

### *1.2 Description of Project*

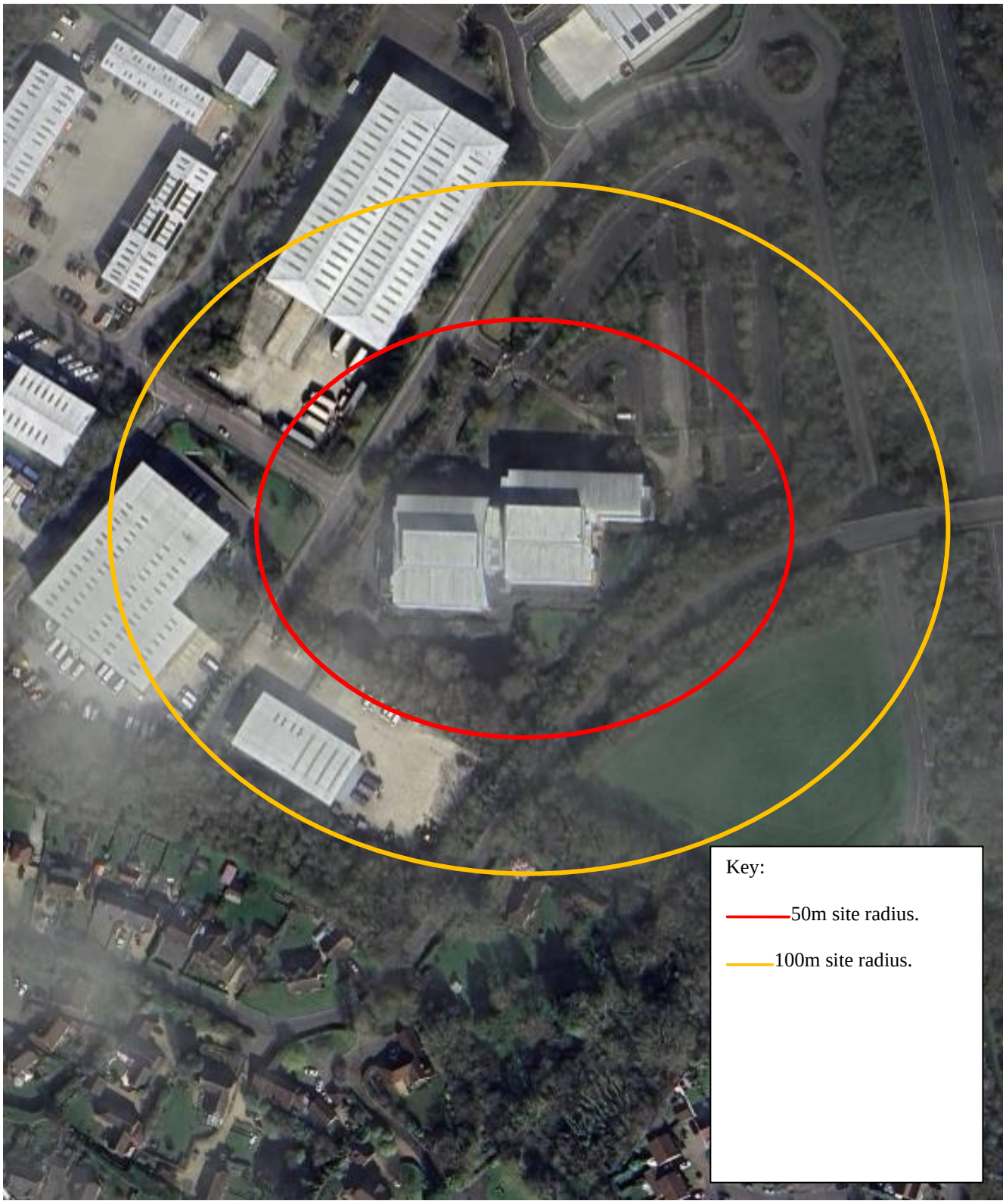
Phase 2 of this project involves the structural demolition, floor slab and foundation to be excavated, and all items crushed to a 6F2 specification.

### *1.3 Description of Area & Location of Sensitive Receptors*

The site is located just off Wilberforce Way, 120 metres away from the A24. The site is situated within a mainly commercial area. The main sensitive receptors are the residential properties to the south of the site.

### *1.3 Project Program*

Physical works on site are due to commence in the first week of September 2024 with a program of 8 weeks.


Key:
50m site radius.
100m site radius.

## 2.0 GENERAL ARRANGEMENTS

### *2.1 Project Directory*

| | |
|---|---|
| **Client:**<br>Legal & General Property Partners<br>One<br>Coleman Street<br>London<br>EC2R 5AA | **Development Manager:**<br>Graftongate<br>The Old Forge<br>49 High Street<br>Henley-in-Arden<br>B95 5AA |
| **Principal Designer:**<br>Trinity Property Consultants<br>10-11 Greenfield Crescent<br>Edgbaston<br>Birmingham<br>B15 3AU | **Contract Administrator:**<br>Trinity Property Consultants<br>10-11 Greenfield Crescent<br>Edgbaston<br>Birmingham<br>B15 3AU |
| **Principal / Demolition Contractor:**<br>City Demolition Contractors (Birmingham) Ltd<br>Blews Street<br>Aston<br>Birmingham<br>B6 4EP<br><br>T: 0121 3337999<br>E: info@citydemolition.co.uk | |

**SITE MANAGEMENT**

| | | |
|---|---|---|
| **Visiting Demolition Director** | Mark Doyle | 07788 442 230 |
| Commercial Director | Richard Jonas | 07979 083 061 |
| Quantity Surveyor | Dan Highfield | 0121 333 7999 |
| Health & Safety Manager | David Cant | 07814 203 977 |
| Site Manager | TBC | |

### *2.2 Roles & Responsibilities*

The Principal Contractor, which is City Demolition for the demolition phase, is responsible for the design and supply of the Project.

The environmental aspects of the Project will be overseen by the Health & Safety Manager, supported by the rest of the management team. Designs undertaken as part of the Project will be produced, supported or reviewed by this environmental team as required

The role of the Health & Safety Manager is:

- Oversee the Project to ensure implementation and adherence to this CEMP
- Ensure that any sub-contractors are aware of the environmental risks / issues associated with the Project and the requirements of this CEMP and that these requirements are carried out in line with their duties
- To ensure that environmental incidents are reported back to them expediently
- To ensure that environmental issues are included in site management meetings
- To ensure that environmental controls are regularly monitored and recorded
- To ensure that environmental risk assessments are up to date, changes to the construction site posing environmental risk are recorded on the risk assessment, and where necessary updates/amendments to the CEMP are completed

The responsibilities of the rest of the management team are:

- To support the Project Manager in the implementation and completion of this CEMP;
- To ensure that the wider workforce is made aware of environmental risks relating to the project
- To ensure that environmental incidents are reported to the appropriate Project Manager in line with reporting timescales and requirements

- To ensure that environmental issues are included in site management meetings;
- To ensure that site environmental controls are regularly monitored, improved as and where necessary and recorded
- To ensure environmental risk assessments are up to date and changes to the construction site posing environmental risk are recorded on the risk assessment
- To co-ordinate and manage the identified environmental issues on the project
- To undertake regular environmental monitoring.

### *2.3 Environmental Policy*
Refer to City Demolition Environmental Policy within the appendices

### *2.4 Environmental Management System Overview*
City Demolition operate a management system that is accredited by NQA as meeting the standards of ISO 14001:2015

Refer to the Environment Plan in the appendices which outlines the framework and measures by which the Company controls environmental issues on site

### *2.5 Environmental Training*
All operatives, whether direct to City Demolition or sub-contractor, will be trained on the requirements of this CEMP through site induction, safety briefings and regular Toolbox Talks.

### *2.6 Records and Documents*
Copies of all consents, licences and waste transfer notes/consignment notes will be retained with the project file for the duration of the Project and a minimum of three years or longer if legally or contractually required. Copies of HSQE briefings, communications to third parties, both internal and external will be retained on site and all licenses and certificates will be available for review within the H&S file.

## 3.0 SITE MANAGEMENT

### *3.1 Site Establishment & Temporary Construction Compounds*
The site will be secured by existing fencing which will be complemented with additional 2.0m high heras fencing. A full-time gateman will be employed to monitor and control the gates.

The construction compound will be formed inside the site demise adjacent to the site entrance, comprising site offices and welfare facilities. Van parking will be on the opposite side of the gateway and a plant compound with stores established in the car park area adjacent to the offices.

Site compounds and storage areas will be kept to the minimum necessary for safe implementation of the works. Where on-site storage of oil and fuels is required, the volumes to be stored would be minimised and stored in accordance with all applicable legislation and good practice, as detailed within the Pollution Prevention section of this CEMP. Clearly defined areas for the storage of oil & fuel will be identified as part of the site establishment process. Spill kits would be located and maintained at all oil storage and refuelling locations and on all site vehicles.

All waste will be stored securely and disposed of through licensed waste carriers, in accordance with waste regulations and the Site Waste Management Plan, as detailed in this CEMP. The waste hierarchy will be followed to keep waste to a minimum. Any temporary construction compounds shall be restored following completion of the works.

There are no highways works required to create access or provide services on site for the demolition phase of the Project.

### *3.2 Access Arrangements*
Construction access will be via the existing entrance from Wilberforce Way (Refer to Traffic Management Plan in appendices).

As per section 3.1, a full-time gateman will be employed to monitor and control the gates.

Existing roadways around the site will be used for access to work locations; routes will be amended as works progress and will be advised to drivers on arrival by the gateman.

### *3.3 Working Hours & Artificial Lighting*

It is anticipated that the works will be undertaken during the normal working week. If any variation to these working hours are required, they must be agreed with the Local Planning Authority and Council.

Normal working hours for the Works will be limited to: -
Monday to Friday between 0800 and 1800
Saturday between 0800 and 1300

No work shall be executed outside of these times or on Sundays or Public Holidays.

Notwithstanding the above, the use of hydraulic / pneumatic breakers on site will be restricted to between the hours of 0900 and 1700 on Monday to Friday throughout.

Although night working is not envisaged during this project, the short daylight hours during the winter and early spring months will mean that task and security lighting will be required. City Demolition will use environmental operational control procedures associated with the management of noise, dust & visual impact in line with best practice, to control any additional light pollution and intrusion. This reduction will include but not be limited to:

- avoiding the use of lighting or use the appropriate lux levels to minimise disturbance;
- using directional lighting to avoid intrusion;
- use alternative energy sources, for example batteries or mains power, rather than generators.

### *3.4 Community Liaison & Communication*

Prior to commencement on site, there will be a letter drop to all adjacent businesses (primarily on Wilberforce Way) and residential properties off Southwater Street. This letter will introduce the company, outline the works to be carried out along with timescales for various operations. It will also have contact details for the site manager and head office (telephone & email) plus postal address for head office.

Further letters will be sent out as works progress to update businesses and neighbours of progress and when there may be potentially disruptive works being undertaken such as use of hydraulic breakers.

On the main site gate there will signs with the contact details for any complaints received or information required during the duration of the works. This will include an emergency telephone number to be used outside normal working hours.

The telephone number provided to local residents and businesses shall be maintained at all times during the Project in order to respond to any enquiries and complaints.

Any complaints received either by site or head office will be logged on the complaints register. After initial review, the complaint will be assigned to a member of the Project team to contact the complainant and investigate further so that the issue can be resolved satisfactorily. Any actions will be recorded on the Complaints Register.

City Demolition aim to have any complaints fully resolved and closed out as soon as possible and within 10 working days at maximum.

## 4.0 TRAFFIC MANAGEMENT

### *4.1 Deliveries to site*

All sub-contractors and suppliers will be provided with clear instructions regarding deliveries to the Construction Site, unloading, storage and site distribution of materials. There will be clear signage for pedestrians to understand the delivery system as well.

City Demolition will manage deliveries to minimise daily truck movements. When there is likely to be increased vehicle movements (eg site establishment),

All loading and offloading would be carried out within the boundary of the Construction Site.

All deliveries would be supervised by a banks man. Any fuel deliveries would take precautions to ensure that the fuel storage tanks are checked before and during delivery to prevent overfilling.

In order to reduce the risks associated with construction traffic and deliveries, the following measures will be implemented:

- Deliveries will be planned to happen outside of busy periods.
- Construction traffic will be directed via designated routes and under the direction of a banksman if the need for reversing is undertaken;
- All deliveries will have a traffic marshal controlling the area outside the Construction Site at all times and temporary barriers would be utilised if required;
- Construction deliveries will be staged, if required. Initially this would be as directed by the banksman;
- Deliveries will be restricted to the working hours to reduce disruption to local residents and businesses. Any deliveries outside working hours require prior agreement with the LPA
- Plant operations and deliveries which are adjacent to areas such as pedestrian routes, non-site vehicular routes or work areas will be accompanied by a designated banks man at all times during its operation.
- The gate marshal would be required to direct pedestrians at access points to the Construction Site
- Any pedestrians visiting the Site office would be segregated from the vehicle movements by a dedicated fenced walkway.

### *4.2 Wheel Cleaning*

City Demolition will ensure that all vehicles leaving the Site are fit to do so and shall maintain the public highways in a clean condition.

In order to mitigate dispersal of mud onto local highways, slabs and hardstanding's will be retained for as long as possible and works will be sequenced to maintain solid haul routes, working progressively out of the site. As the hardcore generated from the demolition works is to be crushed and left on site, the number of vehicle movements will be greatly reduced.

Haul routes on site will be cleaned at regular intervals to prevent a build-up of debris.

The status of haul roads on site and local highways will be continually monitored and cleaning implemented as required:

- A jet wash unit will be available on site at all times to clean wheels of vehicles before they leave site. Existing surface drainage will be protected from run-off by installing a temporary sediment traps/drain mats.
- A road sweeper will be employed to clean haul routes and/or local roads
- If necessary a portable wheel wash will be installed on site with self-contained water recycling and silt filtration system

## 5.0 WASTE MANAGEMENT

### *5.1 Site Waste Management Plan*

Whilst the legal requirement for a SWMP under the 2008 regulations has been revoked, it is the Company policy to produce a Site Waste Management Plan (SWMP) to ensure compliant and sustainable treatment and disposal of all site waste. This will be made available prior to the commencement of works.

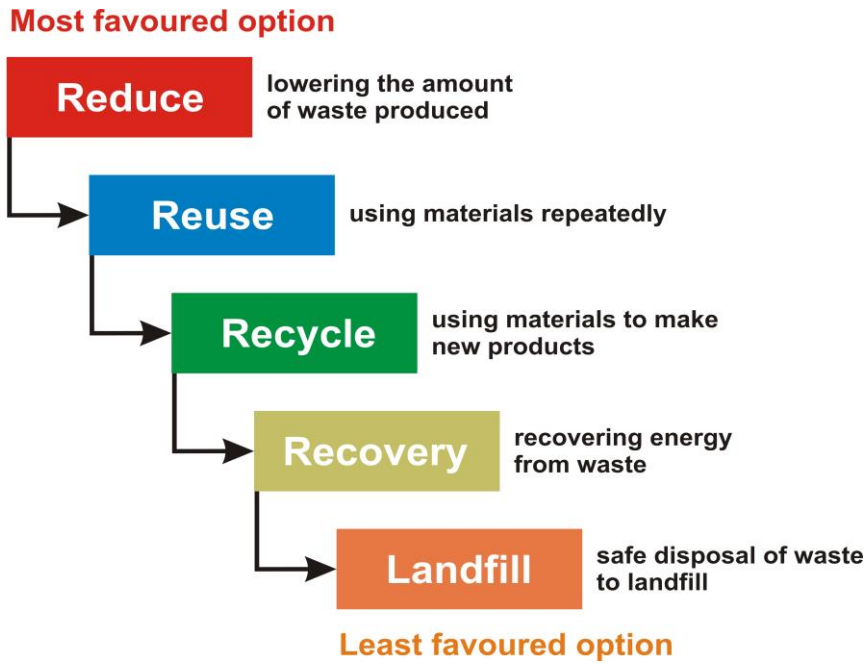
All contractors working on site will be trained in waste management arrangements and the requirements of the SWMP. The SWMP pro-forma will be available on the construction site at all times.

Sub-contractors will provide respective waste information including any transfer or consignment notes for inclusion in the SWMP and H&S File.

### *5.2 Waste Hierarchy*

City Demolition refer to BS6187:2011, NFDC waste permitting guidance, CL:AIRE CoP and the WRAP Protocol

In accordance with the Waste (England & Wales) Regs, the Company has a Duty to apply the waste hierarchy:




In practice, it is not generally possible to reduce the amount of waste from a demolition project and hence the main focus is on reuse and recycling of materials.

Reuse or recycling of products is not always possible because of a number of factors;

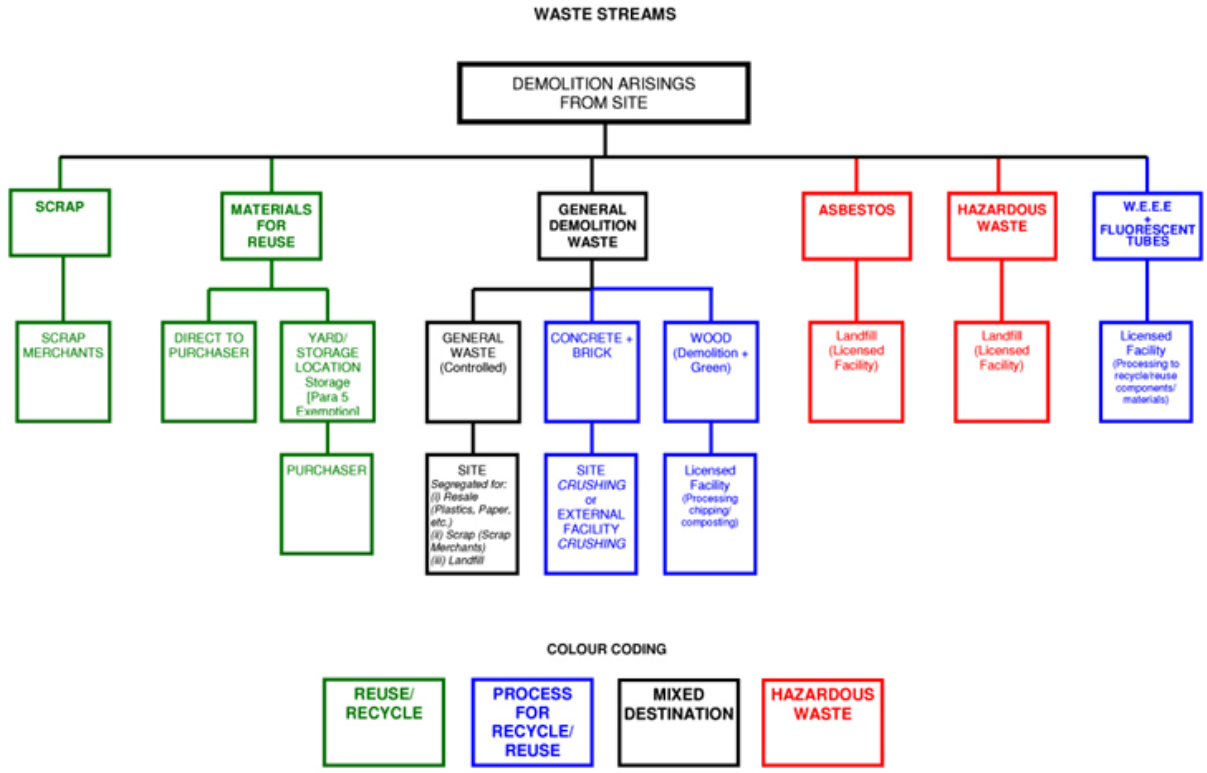
- Difficulties in segregation of material (in terms time and resources required and H&S considerations)
- Material is in poor condition that is not acceptable for reuse/recycling
- Insufficient quantity to make reuse/recycling cost effective

Where reuse / recycling is not possible on site, materials are bulked together in a skip and sent to a waste station that handles larger volumes of such material and has specialist equipment to be able to economically segregate material for recycling.

Where recycling is not possible, energy can be recovered from waste through specialist incineration plant.

The only materials that should be sent to landfill are those where the previous steps are not possible or there is a legal requirement to dispose in this manner. This is generally hazardous waste, in particular asbestos.

During the demolition works, the following flowchart describes how materials will be segregated, subject to site conditions and Health & Safety considerations:




### *5.3 Waste Documentation*

All waste generated and sent off site during the Project will be registered on a SWMP spreadsheet stored electronically in the Project's waste folder at head office and will be updated, at least monthly. Copies of all Waste Transfer Notes and Special Waste Consignment Notes will also be uploaded to the Project's electronic Waste folder for inclusion in the H&S File.

### *5.4 Licences, Permits & Exemptions*

There are several licences, permits or exemptions that are required to be in place prior to waste being removed from site or being processed for reuse on site, the documents required will vary depending on the type of waste and activity being undertaken.

**Waste Carriers Licence** - any organisation that transports waste as part of its business must be registered as a Waste Carrier. This includes any form of waste being removed from site to be disposed of elsewhere, including packaging.

**Waste Management Licence/Permit/Exemption** - a waste management licence, permit or exemption must be in place for the facility that the waste material is going to. This documentation verifies that the facility can legally accept the waste being removed from site. This documentation must be in place and validated prior to any waste removal from site.

**Mobile Plant Licence –** Under the Environmental Permitting (England & Wales) Regulations 2010, a Part B permit is required for any mobile plant (crushers, screens etc) that is brought onto site in order to crush and process waste concrete, brick and other hardcore to produce a secondary aggregate. Before such plant is imported onto site, the Local Authority will be informed of the deployment date and anticipated time on site. Any conditions on the permit will be adhered to at all times on site.

### *5.5 General Guidance*

All personnel must maintain the whole area of operation in a clean, tidy and safe condition by arranging plant and materials in an orderly manner. All rubbish, waste material, debris and the like shall be systematically cleared off the working areas as they accumulate.

Suitable segregated skips shall be used to maximise the potential for recycling or re-use of the waste materials. There will be no burning of materials permitted on the Site.

All wastes will be removed from site by a suitably licensed waste carrier to a suitably licensed or permitted waste management facility for recycling or disposal.

All skips leaving site will be sheeted to prevent debris blowing out in transit.

### *5.6 Hazardous Waste*

There are several sources of hazardous waste that may be present on site that require special treatment and disposal:

**Asbestos**

An asbestos survey carried out by Airteck Analysis Ltd, (Ref: J050517) states that no asbestos is present in the structure.

**Substances from previous usage**

Chemicals and other substances used by previous occupant may be left on site. Likewise, there may be oils and other fluids within equipment such as transformers that were left in situ. City Demolition will carry out a pre-start Hazardous Materials survey of all buildings to identify any such substances. Wherever possible, these materials will be placed into a COSHH quarantine area for specialist waste disposal contractor to deal with. Any equipment or machinery with oils or similar that is not possible to move will be fenced off as a quarantine area until it can be treated by specialist contractor.

Any decommissioning certificates handed over to City Demolition (eg Air Conditioning Unit degassing) will be cross-referenced with equipment on site to verify that all have been carried out.

### *5.7 Sewage Disposal & Treatment*

Sewage from welfare facilities will be directed to existing foul drainage on site until such time that this system needs to be removed to be removed as part of the Project.

Once foul drainage has been removed, waste tanks will be used to collect effluent from the welfare facilities. Sewage will be removed from the tank once weekly from the main compound via a designated and licenced waste removal contractor.

### *5.7 Contingency Planning*

In the event of an accidental release of materials which could cause harm to the environment, steps detailed in the Pollution Control section will be followed

## 6.0 POLLUTION CONTROL

### *6.1 Drainage Management Strategy*

Watercourses could be potentially polluted during construction by virtue of:

- Pollutants from previous usage of site entering drainage systems or groundwater
- Sediment / debris from works entering site drainage systems
- Pollutants from site operations entering drainage systems or groundwater
- Damage to retained drainage from site works
- Uncontrolled release of water from sprinkler tank
- Dewatering of excavations
- Silt run off from site works
- Mud / debris from site works being dispersed onto public highways and then entering public drains

The City Demolition *'Drainage Protection Strategy'* document should be referred to for control measures.

### *6.2 Fuel Storage*

Fuel (diesel for plant) is required on site and is to be stored within the designated area of the site compound. It will be stored within a bunded bowsers on an impermeable medium to prevent seepage into the soil. This area is also to be the designated re-fuelling area, no re-fuelling is to take place on site other than in this location.

These measures are in line with Construction Best Practice.

Clearly defined areas for the storage of oil will be identified as part of the site establishment process.

Spill kits should be located and maintained at the oil storage and refuelling location along with suitable firefighting equipment.

Emergency response procedures will be in place and all members of the site team are aware of its requirements and their responsibilities.

### *6.3 Incident/Emergency Response Plan*

City Demolition have Incident response procedures which detail the management responsibilities and process involved should an environmental emergency occur.

The Site Manager is responsible for ensuring environmental emergency procedures are in place and relevant staff are aware of requirements.

The Site Manager is also responsible for maintaining and monitoring the status of all reported environmental incidents and to ensure that all such incidents are reported to the appropriate authority/client and recorded on a central database.

All Staff have the responsibility to take actions required by this procedure in the event of a leak, spill or environmental emergency.

Steps shall be taken to limit the damage as quickly as possible, using whatever means is to hand in so far as is possible without putting oneself at risk. It is essential that oil, fuel or chemicals be prevented from entering rivers, surface water drainage, sewers or the ground.

Where possible spills are to be contained by cloths/wipes and absorbent materials and the extent of the contamination is local and does not cause any pollution or present a risk to the environment.

Where possible spills shall be prevented from entering watercourses by covering drains or blocking the path of the spillage.

Where a Spill Kit is not available or not sufficient, sand or earth barriers will help to slow down the spread of the spill. Ditches dug around the spillage will help to contain the spread but they should be kept to a minimum depth where possible in order to avoid contamination of the ground.

All waste oil and contaminated spoil shall be disposed of as a Special Waste, using specialist disposal contractor. If there is a risk of leakage of oil from the waste, it must be transported in a sealed container such as a lined skip.

Emergency contact details will be available on site in case any Statutory Provider or Enforcing Authority needs to be contacted.

### *6.4 Noise, Dust & Vibration*

City Demolition have environmental operational control procedures, which will be implemented to ensure that all noise, dust and visual impacts are properly characterised and controlled and that the effects on neighbours are minimised so as not to cause nuisance as defined by the Control of Pollution Act 1974.

BS 5228 "*Code of practice for noise and vibration control on construction and open sites",* and Institute of Air Quality Management's "*Assessment of dust from demolition and construction*" and "*Air quality monitoring in the vicinity of demolition and construction sites*" will be utilised to produce site specific control measures to ensure regulatory compliance and minimise disruption to neighbours.

City Demolition will implement Best Practical Means to eliminate, reduce and manage noise, dust and vibration. This shall include, but not be limited to:

Minimise noise, dust and vibration during demolition through:

- locating plant and equipment away from sensitive receptors,
- maintaining plant to reduce noise emissions,
- using silenced equipment where practicable
- use dust suppression

Reducing the impact on receptor sites from noise and vibration where practical:

- working hours shall be limited to those identified in the Site Management section 3.3
- use of localised screening

**Noise**

A Noise Assessment has been undertaken by Sharps Acoustics (see full report in Appendices) which carried a survey to establish background noise levels in relation to the nearest sensitive receptors. Below is extract from the report.

**Table 3.1: Summary of noise survey results**

| Period | Measured Parameter | Location 1 | Location 2 | Location 2A |
|---|---|---|---|---|
| Day | $L_{Aeq,T}$, dB | 65 | - | - |
| | Typical / representative $L_{A90}$, dB | 64 | - | - |
| Night | $L_{Aeq,T}$, dB | 61 | 57 | 61 |
| | Typical / representative $L_{A90}$, dB | 52 | 53 | 51 |

The representative levels are 64dB during day and 52dB at night.

Whilst the Control of Pollution Act The aim for the demolition phase of the Project is that the rating level of noise emitted by all fixed plant on the site will not exceed 64dB at the boundary with any noise sensitive premises during working hours and 52dB outside working hours. Working hours are defined in Section 3.3.

Noise levels and the impact on receptor sites will be minimised through:

- locating plant and equipment away from sensitive receptors
- maintaining plant to reduce noise emissions,
- using silenced equipment where practicable
- working hours shall be limited to those identified in the Site Management section 3.3
- sequence of demolition to maintain building wall as a barrier for as long as possible
- use of localised screening / acoustic barriers

Noise levels will be continuously recorded at the monitoring unit located at the southern end of the site. This unit has SIM card for real time remote monitoring and will send alerts to the Project Team if noise levels exceed the above threshold levels.

In the event of a breach, works will be halted so that reasons for the exceedance can be investigated and any remedial measures into place.

Any complaints about noise will be recorded on the complaints register and investigated as per Section 3.4

**Dust**

An Air Quality Assessment has been undertaken (see full report in Appendices). In accordance with the Institute of Air Quality Management guidance, the site is deemed to be 'large' for dust emission magnitude. The demolition works have a high impact risk for nuisance dust and medium impact risk for $PM_{10}$ dust.

It is recognised that the emission of dust from demolition operations is inevitable, particularly when dry and windy weather conditions prevail.

In assessing the need for dust control measures, regard shall be paid to:

- The nature of the works.
- Weather conditions likely to prevail during dust generating operations.
- Proximity of dust sensitive properties (residential, commercial and industrial).
- Effects on the general public and road users.

Dust control equipment should be readily available on site from the commencement of works.

The choice of plant and equipment and the method of work should reflect the necessity to employ Best Practical Means in the control of dust. Generally, where alternative methods exist, intrinsically dusty operations such as dry sweeping are not acceptable.

Dust emissions are most commonly caused by the following activities: -

- Demolition (particularly masonry & concrete structures)
- Processing of materials
- Open storage of hardcore materials.
- Vehicular movements across the site.
- Cleaning operations such as sweeping.

- Cutting of stone, concrete, etc.
- Site stripping and excavation of soil.

Dust Control Measures
Dust will be controlled, as far as practicable, by a combination of work practice and engineering controls. If it is not possible to adequately control dust emissions, works will be halted on a temporary basis until conditions change or alternative methodology is employed that is effective.

Water Suppression
Water suppression of dust may be employed to good effect for demolition operations as well as in more general applications where dampening can prevent excessive wind whipping of dust from stockpiles and operational areas of the site

There are a number of suppression systems available which will be used either singularly or in conjunction with other systems;

(a) High pressure water mist at head of excavator boom – water is pumped along boom and fired through nozzles directly onto the area that is being worked on. This gives direct suppression onto the main source of the dust.






(b) Dust fighter – ground-based unit that fires water through nozzles with turbine to propel a fine water mist spray up to 50m in distance. The water mist can be directed up and down plus rotated for maximum effectiveness.




(c) Hand-held fire hoses – these give a directed water spray to a specific area and can either be ground based or raised to height using a cherry-picker. Highly effective on a small area or for drenching.

(d) Any cutting equipment will have dust suppression fitted and checked before use.

The misting systems are more effective as the dust binds to the microscopic water droplets and fall out of the air to ground level, but they are more susceptible to the wind.

It is the responsibility of the site manager to place the dust suppression systems in suitable positions depending on the prevailing wind conditions to create the ideal combination for dust suppression.

The need to ensure that adequate water supplies are available, either from the mains, bowsers or other sources is a prime consideration at the planning stage.

Cognisance is taken of The Greater London Authority '*The Control of Dust and Emissions During Construction and Demolition'* guidance for other control measures that will be utilised:

- skips, chutes and conveyors will be covered and, if necessary, enclosed to ensure that dust does not escape
- no burning of any materials will be permitted on site
- wherever possible, any excess material will be reused or recycled on-site in accordance with appropriate legislation
- hard surfaces will be used for haul routes where possible
- haul routes will be swept/washed regularly
- all vehicles carrying dusty materials should be securely covered; and
- delivery areas, stockpiles and particularly dusty items of construction plant will be kept as far away from neighbouring properties as possible
- soft strip and asbestos removal will be carried out before mechanical demolition and waste arising from these operations removed from site
- sequence of demolition will maintain perimeter walls of the main building for as long as possible to act as a dust screen.
- Stockpiles of dusty material (ie crushed material) will be kept to maximum 3m in height, levelled off and battered down

Baseline readings will be taken on site before demolition works to check whether this is an accurate figure. Assuming that this is accurate, the aim for the demolition phase of the Project is that dust will be kept within this level at the boundary with any sensitive premises.

Dust levels will be continuously recorded at the monitoring unit located at the southern end of the site. This unit has SIM card for real time remote monitoring and will send alerts to the Project Team if dust levels exceed the above threshold levels.

In the event of a breach, works will be halted so that reasons for the exceedance can be investigated and any remedial measures into place.

In addition, regular dust soiling checks of surfaces such as street furniture, cars and window sills within 100m of site boundary, will be undertaken.

Any complaints about dust will be recorded on the complaints register and investigated as per Section 3.4

**Vibration**
As part of our duty of care to adjacent buildings, operations must ensure that the exposure to vibration is limited.

BS 7385: Part 2:1993: Evaluation and Measurement for Vibration in Buildings

For building damage criteria, Table 12.32 (below) sets out limits for primarily transient vibration above which cosmetic damage could occur. It is drawn from Table 1 of BS 7385: Part 2: 1993 Evaluation and measurement for vibration in buildings - guide to damage levels from ground borne vibration.

| **Building Type** | **Peak Particle Velocity (mm/s) in Frequency Range of Predominant Pulse** | |
|---|---|---|
| Reinforced or framed structures. Industrial and heavy commercial buildings. | 50 mm/s at 4 Hz and above | |
| Unreinforced or light framed structures. Residential or light commercial type buildings. | 4 Hz to 15 Hz | 15 Hz and above |
| | 15 mm/s at 4 Hz increasing to 20 mm/s at 15 Hz | 20 mm/s at 15 Hz increasing to 50 mm/s at 40 Hz and above |

As the majority of buildings are single storey and relatively low level, it is not envisaged that demolition works will create excessive vibration. However, use of hydraulic breakers for the break-up of the slab and foundations will cause greater levels of percussive vibration. There is no piling operations involved in the demolition phase of the Project.

Vibration will be monitored at various points around the site throughout the works using an Accudata GVM-1 seismograph.

In the event that vibration levels are breached, works will be halted so that reasons for the exceedance can be investigated and any remedial measures into place.

Notwithstanding this, it is possible that lesser levels of vibration may cause disruption and nuisance to neighbouring properties. Any complaint received about vibration will be recorded on the complaints register and investigated as per Section 3.4.

Control measures that may be implemented to reduce or control transmission of vibration include:

- Saw cutting slabs before using hydraulic breaker
- Excavation of trench between breaking operations and sensitive receptor
- Chemical / non-explosive cracking of concrete
- Excavate slab / foundations in lager sections and then use pulveriser to reduce material and remove rebar
- Use of guillotine breaker that has less percussive impact than hydraulic breaker and fractures concrete so that it can be excavated with bucket

## 7.0 ECOLOGICAL ASSESSMENT

### *7.1 Ecological Impact Assessment*

An ecological impact assessment was carried out by BWB Consulting (Ref: 221066 _Ecological Impact Assessment Addendum) which has identified the presence of bats and hazel dormouse on site, both legally protected species. City Demolition site operatives will be briefed on this report before works begin. The impact of not adhering to any licences can lead to up to six months imprisonment, or £5,000.00 fine per individual animal harmed.

A European Protected Species (EPS) licence for bats will be required from Natural England before works to the building can commence. A licence can only be applied for once any relevant permissions are in place (such as planning consent, demolition consent or listed building consent). One replacement crevice roost will be installed to compensate for the loss of one common pipistrelle roost integrated into the fabric of the new building where reasonably practicable or attached to a retained mature tree. A report from BWB Consulting (Ref: 221066_Bat Survey Report) Will accompany this plan.

All City Demolition site operatives are trained to be vigilant for any bats/signs of bats during their work. If unknown bats are discovered during works, site is to stop work and notify client.

Dormice were recorded on-site, including juveniles. The works have the potential to reduce the area of suitable dormouse habitat as well as physically harm or disturb dormice during the construction phase through vegetation clearance. All vegetation clearance and construction works will be conducted under a European Protected Species (EPS) Mitigation Licence, for dormice, with appropriate mitigation required prior to any works being undertake on Site. A strategy has been developed by BWB Consulting (Ref: 221066 _Dormouse Enhancement Strategy) to identify the possible impact and create new habitats in the construction stage of this project.

Some vegetation on site will be retained for the dormice. Fencing will be installed to ensure no plant/operatives encroach into possible habitats. If any vegetation clearance is required by City Demolition, this will be carried out under supervision and in 1 metre strips to encourage animals into adjacent habitats.

All vegetation clearance should be undertaken under the guidance of a suitably qualified ecologist to ensure compliance with the bat and dormice licences and to avoid illegally killing or disturbing other wildlife, e.g. nesting birds.

## 8.0 APPENDICES

| | |
|---|---|
| Appendix A | Sensitive Receptors & Monitoring Point Plan |
| Appendix B | Traffic Management Plan |
| Appendix C | City Demolition Environment Plan |
| Appendix D | City Demolition Drainage Protection Strategy - Survey to be instructed. |
| Appendix E | AAC Acoustics Noise Assessment – Client Provided |
| Appendix F | AAC Air Quality Assessment – Client Provided |
| Appendix G | BWB Dormouse Enhancement Strategy – Client Provided |
| Appendix H | BWB Ecological Impact Assessment – Client Provided |
| Appendix I | BWB Precautionary Method of Works (Bats) – Client Provided BWB Bat |
| Appendix J | Survey Report – Client Provided |
| Appendix K | Middlemarch Arboriculturally Impact Assessment – Client Provided City |
| Appendix L | Demolition Environmental Policy |
| Appendix M | Complaints Register |

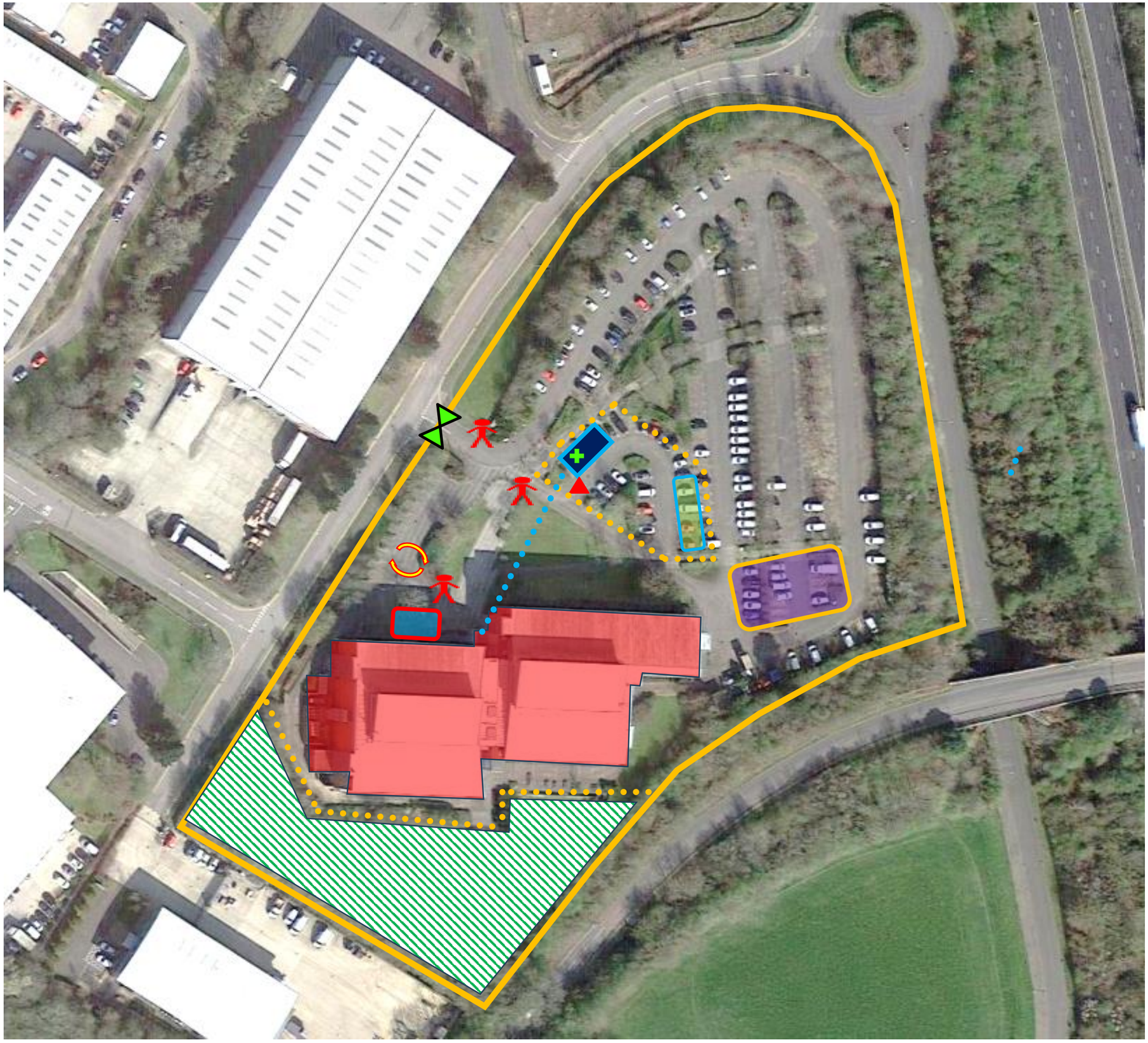



CITY DEMOLITION

**Sensitive Receptors & Monitoring Point Plan**

- Location of works
- 100 metre radius
- 250 metre radius
- Sensitive receptors
- Monitoring point

Wilberforce House,
Wilberforce Way,
Southwater, Horsham,
RH13 9RS



CITY DEMOLITION

**Traffic Management Plan**

- Site Boundary
- Structures to be stripped
- Access gate
- Site Welfare / Office **(24ft containers)**
- Car / Van parking area
- Site Muster Point
- First Aid Point
- Loading / unloading area
- HGV turning area
- Banksman
- Pedestrian route
- Internal heras fence
- Ecology Protection Zone – No Access
- Plant/Material Storage Area.

Wilberforce House
Wilberforce Way
Southwater
Horsham, RH13 9RS

# ENVIRONMENT PLAN

Demolition & Associated Works at:

Wilberforce House, Wilberforce Way,

Southwater, Horsham, RH13 9RS

for

Legal & General Property Partners

Project No: C5249-21-697

| | | | | |
|---|---|---|---|---|
| Prepared by: Thomas Doyle | | | Date: 21/08/2023 | |
| Copy No: 1 PROJECT FILE | | | Copy No: 3 CLIENT | |
| Copy No: 2 SITE | | | Copy No: 4 PRINCIPAL DESIGNER | |
| ISSUE STATUS | Issue One | Issue Two | Issue Three | Issue Four |
| | 21/08/2023 | | | |
| ***REVISIONS ARE IDENTIFIED BY A VERTICAL LINE TO THE RIGHT OF THE AMENDED/ADDED TEXT*** | | | | |

**ALL PERSONNEL MUST RECEIVE INDUCTION RELATING TO THIS DOCUMENT BEFORE STARTING WORK**

**CONTENTS**

1.0 Introduction

2.0 Parties to the Project

3.0 Policy Statement

4.0 Organisation

5.0 Control Measures

6.0 Risk Assessment

7.0 Operational Controls

8.0 Environmental Incidents

9.0 Communication and Training

10.0 Review

11.0 Waste Streams

12.0 Appendices
Appendix A Environmental Policy Statement
Appendix B Company Organisation Chart
Appendix C Environmental Aspects, Impacts and Risk Assessments

**IMPORTANT NOTE:**

All other details of the Project, including Project information, Permitry, Business Management System Procedures, Assessments, etc. are detailed in the related task/area specific Method Statements and Plans of Work (notifiable asbestos removal).

The Method Statements and Plans of Work form an integral part of the Project Management and Methodology.

## 1.0 Introduction

The purpose of this document is to outline the framework and measures by which the Company controls environmental issues for which we have responsibility.

It has been developed to provide direction to specific procedures that control activities that have, or have the potential to have, an environmental impact.

It also addresses the roles, responsibilities and authorities of the Project Management Team who ensure that the policy is carried out effectively.

## 2.0 Parties to the Project

### *2.1 Project Directory*

| | |
|---|---|
| **Client:**<br>Legal & General Property Partners<br>One<br>Coleman Street<br>London<br>EC2R 5AA | **Development Manager:**<br>Graftongate<br>The Old Forge<br>49 High Street<br>Henley-in-Arden<br>B95 5AA |
| **Principal Designer:**<br>Trinity Property Consultants<br>10-11 Greenfield Crescent<br>Edgbaston<br>Birmingham<br>B15 3AU | **Contract Administrator:**<br>Trinity Property Consultants<br>10-11 Greenfield Crescent<br>Edgbaston<br>Birmingham<br>B15 3AU |
| **Principal / Demolition Contractor:**<br>City Demolition Contractors (Birmingham) Ltd<br>Blews Street<br>Aston<br>Birmingham<br>B6 4EP<br><br>T: 0121 3337999<br>E: info@citydemolition.co.uk | |

## 3.0 Policy Statement

The Company Environmental Policy Statement (Appendix A) defines the Company commitment to minimising environmental impact caused by our operations.

## 4.0 Organisation

The Company Organisation Chart (Appendix B) shows environmental responsibilities within the Company.

The defined personnel receive necessary information and training commensurate with their responsibilities within the Company.

Full details or responsibilities are detailed in the Environmental Policy. A ‘Controlled’ copy of this document is held by the Site Supervisor. ‘Uncontrolled’ copies are available upon request.

## 5.0 Control Measures

Detailed below is a brief overview of the control measures in place to minimise the impact to the environment as a result of Company Activities.

Full control methodology is defined within the Process Procedures and related ‘safe system of work’ (Method Statements, and related Assessments) generated for all works activities.

*Waste Management*
All waste produced will be:

- Appropriately handled, particularly in the case of hazardous or toxic waste, by competent personnel and competent/licensed operators
- Segregated where feasible to aid recycling
- Promptly placed in the appropriate disposal area, stockpile or receptacle
- Disposed of in accordance with requirements of the Environmental Protection Act 1990, section 34(1) of Part II, Waste Management Duty of Care, the Hazardous Waste Regulations 2005 and other related legislation.

If required a Site Waste Management Plan (SWMP) will be generated, this will generally be in accordance with the revoked Site Waste Management Plan Regulations

*Storage of Fuels, Oils & Chemical*
Containers must be stored within a drip tray (or similar), bund or any other suitable secondary containment system (SCS).

All containers must be located in a safe place to minimise the risk of damage and locked-off when not in use.

For oil tanks, intermediate bulk containers and mobile bowsers the SCS must be able to hold:

- Where one container is being stored - a minimum of 110% of the total volume;
- Where more than one container is being stored - a minimum of 110% of the largest container's storage volume, or at least 25% of their total volume (whichever is greater);
- For drum storage, the interceptor tray must be able to hold at least 25% of the total storage capacity of the drums.

**Use of Energy and Water**
Temporary site establishments will:

Be weatherproof and insulated with thermostatically controlled heating

*Discharges to Water and Land*
All plant, equipment and transport will be:

- Fuelled from bunded storage areas which have spill kits close at hand
- Maintained in designated bunded areas wherever feasible
- Be fitted with drip trays wherever possible
- Be subject to wheel cleaning prior to accessing roadways off site if appropriate

Effluent from ablutions will be connected to public sewers wherever possible or stored in suitable leak proof containers for specialized disposal.

*Nuisance*
Noise and vibration disturbance will be minimized by:

- Ensuring all equipment is serviced and maintained to minimize noise and vibration
- Utilising mains power instead of generators where feasible
- Working within agreed hours

Disturbance to the local community and third parties will be minimised by:

- Only utilising agreed access and egress points
- Parking in designated areas only
- Observing good neighbour procedures and reporting any complaints to the QHSE Manager
- Obeying traffic and pedestrian management schemes
- Planning deliveries in off peak periods where practicable
- Ensuring information on disruptive activities is adequately communicated by appropriate means, including newsletters; site visits, visits to local schools etc.
- Ensuring maximum noise levels as detailed in the Control of Pollution Act – 'Schedule of Maximum Permissible Site Boundary Noise Levels' are not exceeded.

| **Day** | **Time** | **Maximum Noise Level (Hourly)** |
|---|---|---|
| Weekdays<br>Weekday evenings<br>Weekday nights | 0700 to 1900 (7.00 am to 7.00 pm)<br>1900 to 2200 (7.00 pm to 10.00 pm)<br>2200 to 0700 (10.00 pm to 7.00 am) | 75dBA<br>65dBA<br>35dBA |
| Saturdays<br>Weekends | 0700 to 1200 (7.00 am to 12.00 midday)<br>1200 Saturday to 0700 Monday<br>(12.00 midday Saturday to 7.00 am Monday) | 75dBA<br>35dBA |
| Bank Holidays<br>& Local Holidays | At any time | 35dBA |

*Environmental Planning*

Environmental planning will be carried out by:

- Undertaking electronic preparation, transfer and storage of information wherever feasible
- Briefing company personnel on site specific environmental matters
- Carrying out site inductions and attending Client inductions as appropriate
- Respecting the presence of rare endangered and protected species such as bats, badgers, newts, toads, orchids etc.
- Assisting in communications with regulatory bodies and third parties
- Integrating environmental issues into Environment Management Plans, Method Statements and related assessments (Risk, COSHH, Environmental, etc.)
- Carrying out environmental risk assessments
- Self auditing of adherence to agreed environmental work practices
- Ensuring response procedures are drawn up and communicated to the workforce in anticipation of harmful unplanned events taking place
- Providing adequate environmental training to company personnel

*Visual Appearance*

Visual appearance of the site will be such so as to provide minimum intrusion onto neighbours by:

- Ensuring that the intensity and direction of permanent and temporary security and general lighting is strategically sited so as not to cause annoyance or harm to the workforce, the local community of third parties
- Ensuring that hoardings and perimeter fencing are of robust construction, are maintained in good order and are sensitive to the locality at all times
- Ensuring good housekeeping is maintained and that the site presents as good an appearance as is reasonably practicable within the nature of demolition activities

*Ongoing Effects of Demolition*

Ongoing effects of demolition activities will be mitigated by: -

- Segregating and/or protecting areas of natural habitat
- Communication with local regulatory groups
- Observing wildlife breeding seasons within the demolition programme
- Determining the presence of and protecting/preserving third party property in the vicinity of demolition activities
- Determining the presence of and protecting/preserving archaeological remains in the vicinity of demolition activities
- Determining the presence of and protecting/preserving historically protected buildings or structures in the vicinity of demolition activities

## 6.0 Risk Assessments and Environmental Impacts

Environmental Risk Assessments (Appendix C) detail control measures required to minimise risks to the environment arising from our operations and detail the Environmental Impacts of our works activities.

The Environmental Risk Assessments, in association with the Health and Safety Risk Assessments, accompanying the Method Statement(s) detail fully the measures implemented to ensure control of our operations.

The Environmental Aspects and Impacts Register, Significance Register and supporting documentation (Appendix D) identify the environmental issues relating to our works activities and their environmental impact(s) and significance.

## 7.0 Operational Controls

The Environmental Management Systems to be operated for the duration of the contract are those operated on all Company's sites, involving strict compliance with the Business Management System (BMS) Procedures.

The Procedures control all aspects of the safety, environmental and quality operations on site, in particular.

These procedures require generation and retention of Method Statements, assessments, including risk, COSHH, manual handling, PPE, etc., clearly defined records (specified pro-formas) to provide documented objective evidence to enable both internal and third party audits to be carried out. The records may also be utilised in the event of complaints relating to safety, environmental or operational matters.

All records are contained in our Management System and are subject to controlled issue.

The detailed procedures for issue/retention of records and requirement for internal audits are:

- Document Control
- Quality Records
- Internal Quality Audits

Company records also identify quantities of materials to waste, to re-cycle and to re-use; these will be maintained in appropriate format and will be provided to the Client if required by Contract conditions.

A Demolition Recovery Index (DRI) will be calculated upon completion of the Project; this will be retained in the DRI Register.

**8.0 Environmental Incidents**

Spill kits will be located at appropriate points around the site, especially near re-fuelling points, with plant/ equipment and in the site office.

Any spills will be cleaned up immediately using suitable absorbent materials, crystals, pads or booms, contained within the spill kit.

In the event of any spills the following actions will be carried out:

- Use absorbent material to contain the spill
- If it is a major spill
  - Cover or bund any nearby drains
  - If practical use absorbent crystals to clear spill, if not, use bowser and pump
- Dispose of all absorbent materials in a suitable container for disposal as hazardous waste

To benefit the site environment and reduce the likelihood of spills/environmental incidents, a clean and tidy site area around re-fuelling points will be maintained and good housekeeping will be carried out in all areas on site.

## 9.0 Communication & Training

***Induction***

The Company carries out induction of all personnel, the inductions fall into three basic categories:

- Company Induction
  All employees receive an induction into the Company, this provides information relating to the health and safety requirements, environmental requirements, management systems, terms of employment, etc.
- Client and/or Principal Contractor Induction
  This is generally a requirement to inform personnel of Client and/or Principal Contractor Site safety and environmental requirements, including Site Rules and Regulations
- Project Specific Induction
  This is to explain details of the Site requirements, Method Statements, Environmental Management Plans and related assessments.

All personnel are required to sign the appropriate Induction Register to confirm their receipt of the induction

***General Training***

The Company will ensure that all operatives on this project are fully conversant with the safe systems of work and environmental requirements intended for this project.

All employees are screened for competency on joining the company and will have received Health and Safety and Environmental Induction training prior to commencement of their duties on site.

Due to the nature of Company operations these considerations are inextricably interlinked and are embedded in our Management System.

No operatives will be allowed to work on projects unless they are fully trained in the work they are being asked to do, or alternatively, they are under training and supervised by a person competent in that task.

Training records are held on file at Head Office. These records contain details of training received prior to employment by The Company, together with all “in house” and external training achievements whilst employed by the Company.

***Ongoing Training***

Ongoing training will be given to all operatives as deemed appropriate and will take the form of CITB or other training providers courses (e.g. Safety Awareness) conducted by external training bodies. Specialist training courses will be provided to suit the requirements of specific trades/skills.

***Toolbox Talks***

Toolbox talks are part of the Company safety and environmental procedures and are given by the Site Supervisors on a weekly basis. The talks are recorded and the operatives sign as having attended and understood. Scripts covering many topics are available to all Site Supervisors and cover a wide variety of relevant topics.

## 10.0 Review

The Site Supervisor will carry out a weekly review of environmental and safety performance. This will be by completion of appropriate Management System documentation.

The Managing Director, in association with the Technical Director, Demolition Manager, Quality Manager and Safety Advisor, will review environmental performance on an ongoing basis.

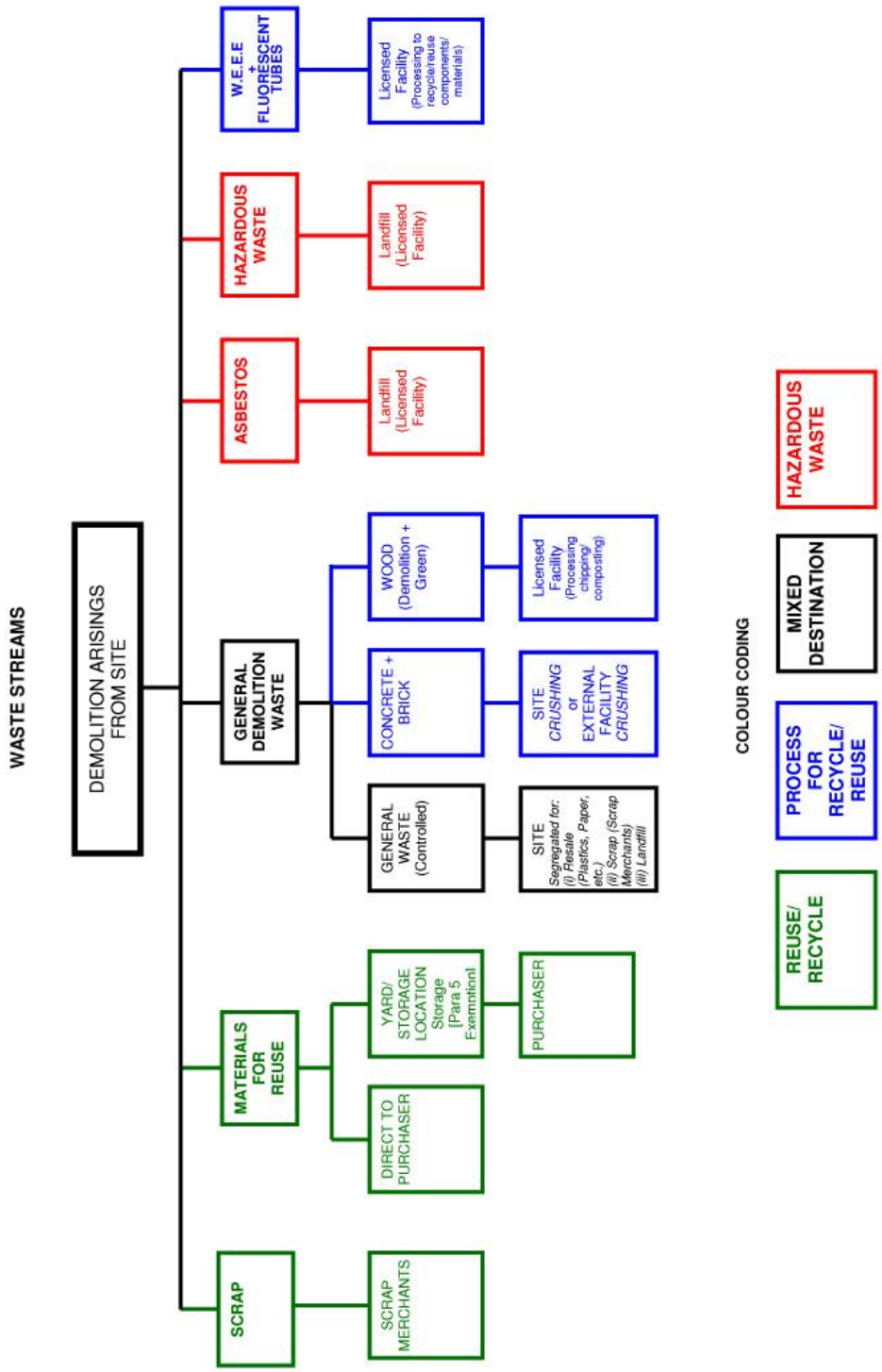
At the reviews appropriate corrective action measures will be developed and implemented to ensure continuous process improvement is maintained.

All corrective action measures will be taken in a time period commensurate with the seriousness of the deficiency and/or the scope for improvement in environmental performance.

A review of Company performance, including health and safety, environmental and operational issues, is carried out on an ongoing basis.

A formal review is carried out annually – this is documented as required by the Management System.

**11.0 Waste Streams**



**12.0 Appendices**

Appendix A Environmental Policy Statement
Appendix B Company Organisation Chart
Appendix C Environmental Aspects, Impacts and Risk Assessments

# APPENDIX A

## ENVIRONMENTAL POLICY STATEMENT

## Environmental Policy

A central part of City Demolition Contractors (Birmingham) Limited's business is the demolition, dismantling, remediation and onward sale of demolition arisings with minimal environmental impact. We aim to do this directly through our business practices and indirectly by influencing our suppliers and customers.

City Demolition's objective with regard to the environment is to ensure that we understand and effectively manage the actual and potential environmental impact of our activities. Our operations will be conducted with due consideration being given to sustainability and the limited use of natural resources. Furthermore, we are committed to reducing our carbon footprint and achieve net zero by 2050.

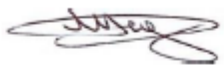
We will comply with all legal requirements in areas where we carry out our business to prevent environmental damage, make a commitment to the protection of the environment, prevention of pollution, minimising energy and resource usage and ensure that the principles of sustainable development are operated throughout all of City Demolition's operations.

We will therefore:

- Identify the significant environmental aspects and impacts from current and relevant past activities and services and, where we have direct control or can be expected to have an influence, implement an appropriate environmental management system;
- Minimise and where reasonably practicable eliminate any adverse impact on the environment arising from the activities of our business;
- Minimise the use of energy, resources consumed, and waste produced while undertaking our business activities in a safe and professional manner;
- Support the reduction, reuse and recycling of materials and ensure the legal disposal of all waste arising from the activities of our business;
- Develop a Carbon Reduction Plan and closely monitor our GHG emissions and improvements in the way we operate and manage the service we deliver;
- Comply with legal requirements and where appropriate go beyond compliance with the minimum environmental requirements of legislative bodies and our customers;
- Make appropriate resources available to manage the environment and ensure human resource roles, responsibilities and authorities are defined;
- Ensure that all staff whose work may create a significant impact upon the environment are provided with adequate and appropriate information and training and are competent in environmental matters;
- Inform and train our staff in understanding and fulfilling their environmental responsibilities and those of the company;
- Establish and measure environmental performance against objectives and/or targets;
- Regularly review our environmental management system at senior management level with a view to continually improving our environmental performance.

This policy shall be communicated to all employees and suppliers and shall be available to all interested parties on request.

Signed:



Mark Doyle
Managing Director
December 2023

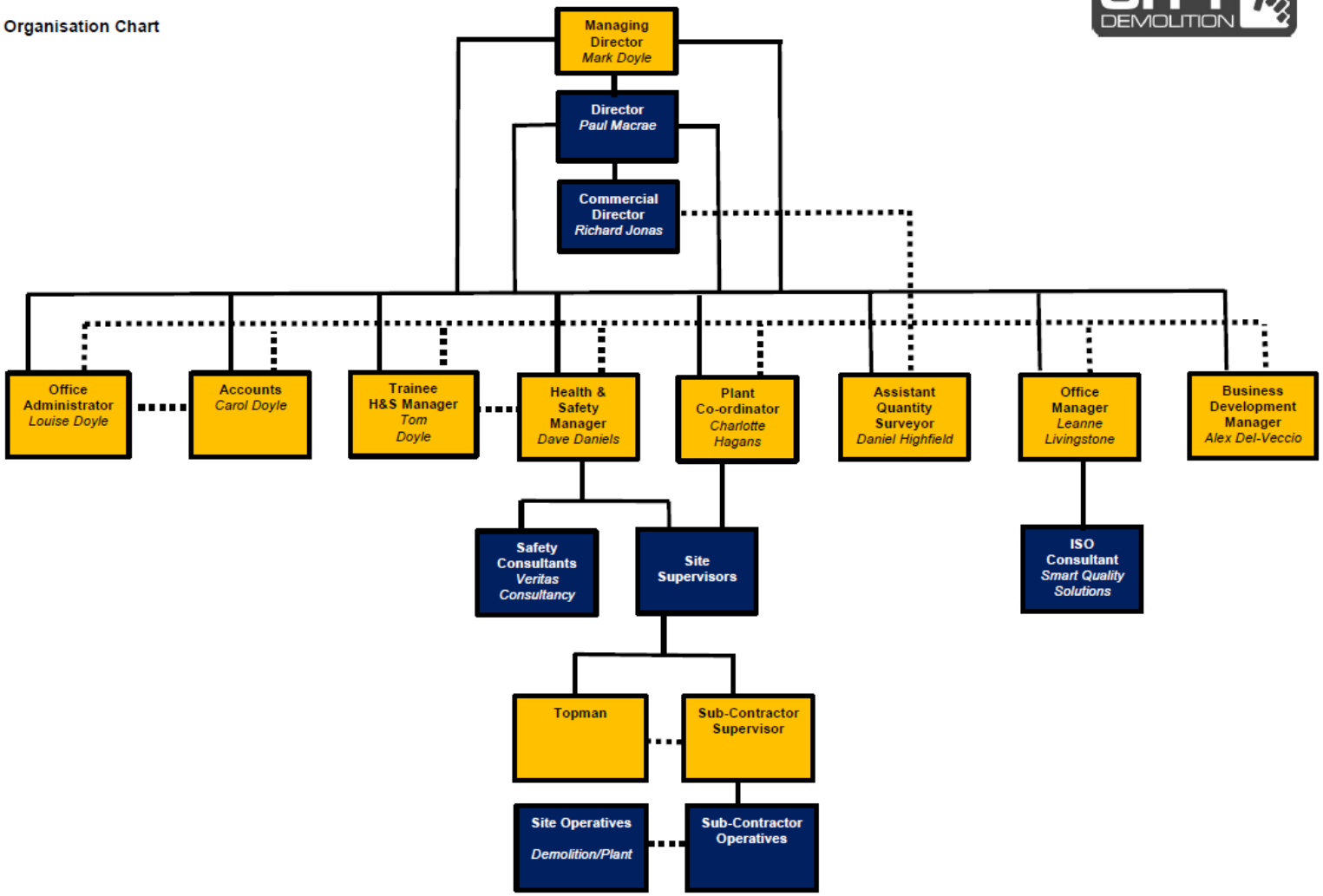
**Date of next review:**
**December 2024**

**03-09/2023**

# APPENDIX B

## COMPANY ORGANISATION CHART

## Organisation Chart




June 2024

# APPENDIX C

## ENVIRONMENTAL ASPECTS, IMPACTS AND RISK ASSESSMENTS

**ENVIRONMENTAL ASPECTS & IMPACTS + ENVIRONMENTAL RISK ASSESSMENTS On-Site**

| KEY | | | | | | |
|---|---|---|---|---|---|---|
| ENVIRONMENTAL RISK RATING (RR = Severity [S] x Freqency [L] | | | | | | |
| SEVERITY OF CONSEQUENCE (S) | (1) Negligible<br>Minimal loss/impact to the environment | (2) Marginal<br>Minor loss/impact to the enviroment | (3) Serious<br>Moderate loss/short term damage to the environment | (4) Critical<br>Significant loss/medium term damage to the environment | (5) Catastrophic<br>Catastrophic loss/long term damage to the environment | |
| LIKELIHOOD OF OCCURRENCE (L) | (1) Improbable<br>Annually,<br>Very unlikely/will never occur | (2) Remote<br>≤3 months,<br>Unlikely but possible | (3) Occasional<br>Monthly, | (4) Probable<br>Weekly,<br>Several times | (5) Frequent<br>Daily,<br>Many occasions | |
| SIGNIFICANCE RATING [SR] | | | | | | |
| Significiance Rating [SR] | Remedial Action | | | | | |
| LOW (1-8) [L] | No further mitigation required - periodic monitoring | | | | | |
| MEDIUM (9-18) [M] | Acceptable - Ongoing monitoring/control and periodic review | | | | | |
| HIGH (19-25) [L] | Not acceptable - further mitigation required | | | | | |

| REF | ENVIROMENTAL ASPECT + ACTIVITY | N A E | Impact Assessment: Emissions Air | Emissions Energy (heat, Noise, Odour) | Releases Water | Releases Land | Usage Raw Materials | Usage Energy | Waste Solids | Waste Liquids | Waste Gases | Lifecycle stages we can influence | INITIAL RISK RATING S | INITIAL RISK RATING L | INITIAL RISK RATING IRR | POTENTIAL ENVIRONMENTAL IMPACT + RISKS | CONTROL MEASURES | RESIDUAL RISK RATING S | RESIDUAL RISK RATING L | RESIDUAL RISK RATING RRR | SR | Legal Register Reference |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| EN 01A | DUST/PARTICULATE EMISSIONS<br>Demolition activities | N | y | y | x | y | x | y | y | x | x | 1,3,5,7 | 4 | 5 | 20 | Ill health to workers and other affected by our activities.<br>Damage to wildlife and ecology;<br>Comtamination of water courses and surrounding environment;<br>Legal Action by Statutory Authorities;<br>Complaints from public;<br>Damage or disruption to property;<br>Disruption on roads;<br>Damage to plant/equipment/vehicles. | Demolition undertaken with suitable methods to minimise dust/particulate emissions;<br>Damping down as appropriate - using mobile bowsers, dust bosses etc;<br>Segregation - fencing, mesh, etc;<br>Personal Protective Equipment (PPE)<br>Monitoring and visual inspections. | 4 | 2 | 8 | L | EL01, EL02, EHSL01, EL26 |
| | | A | y | y | y | y | x | y | y | x | x | | | | | | | | | | | |
| | | E | y | y | y | y | x | y | y | x | x | | | | | | | | | | | |
| EN 01B | DUST/PARTICULATE EMISSIONS<br>Asbestos removal activities | N | x | x | x | x | x | x | y | x | x | 7 | 5 | 5 | 25 | | Plant of Work/Method Statement in place before any work starts - identifying required controls and methodologies;<br>Strictly controlled removal;<br>Enclosures constructed as appropriate;<br>Damping down as appropriate;<br>PPE;<br>Monitoring by analyst as appropriate/necessary. | 5 | 1 | 5 | L | EL01, EL02, EL03, EL04, EL05, EL06, EL07, EL08, EL09. EL18, EL19, EL20, EL21, EL26 |
| | | A | x | x | x | x | x | x | y | x | x | | | | | | | | | | | |
| | | E | y | x | x | y | x | x | y | x | x | | | | | | | | | | | |
| EN 01C | DUST/PARTICULATE EMISSIONS<br>Vehicle movements - on and off site | N | y | x | x | x | x | y | x | x | y | 3,5,6,7,8 | 4 | 5 | 20 | | Damping down - mobile bowsers;<br>Wheel wash;<br>Covered vehicles;<br>Road Sweepers;<br>Speed limitations;<br>Monitoring and visual inspections. | 4 | 2 | 8 | L | EL01, EL02, EL10, EL26, EHSL03 |
| | | A | y | y | x | y | x | y | y | x | y | | | | | | | | | | | |
| EN 01D | DUST/PARTICULATE EMISSIONS<br>Crushing/Stockpiles | N | x | y | y | x | y | y | y | x | y | 1,3,5,8 | 4 | 5 | 20 | | Damping down;<br>Dust sheets/fencing depending upon location (both of crusher and stockpile(s) and Site, taking cognisance of vicinity of neighbours);<br>PPE;<br>Monitoring and visual inspections. | 4 | 2 | 8 | L | EL01, EL02, EL03, EL04, EL06, EL07, EL08, EL09, EL15, EL16, EL17, EL19, EL20, EL26, EHSL02, EHSL04 |
| | | A | y | y | y | x | y | y | y | x | y | | | | | | | | | | | |
| EN 01E | DUST/PARTICULATE EMISSIONS<br>Excavations | N | y | y | x | x | x | y | y | x | y | 7,8 | 4 | 4 | 16 | | Dust sheets/fencing;<br>Monitoring and visual inspection. | 4 | 2 | 8 | L | EL01, EL02, EL03, EL04, EL05, EL06, EL07, EL08, EL09. EL18, EL19, EL20, EL21, EL26 |
| | | A | y | y | x | x | x | y | y | x | y | | | | | | | | | | | |
| | | E | y | y | y | y | x | x | y | y | y | | | | | | | | | | | |
| 16EN 02A | NOISE<br>Demolition activities - use of demolition plant/equipment, compressors and generators. | N | y | y | x | x | x | y | x | x | x | 5,6,8 | 4 | 5 | 20 | Ill health to workers and others affected by our activities;<br>Complaints by residents;<br>Legal Action by Statutory Authorities;<br>Disruption and disturbance to wildlife;<br>Failure to meet requirements laid out by Local Authority/S81. | Demolition of Buildings undertaken with a suitable methods to minimise noise/vibration;<br>Hearing protection zones;<br>PPE;<br>Plant/equipment to be effectively silenced, serviced and maintained; | 4 | 3 | 12 | M | ESLH02, ESLH04 |
| | | A | y | y | x | x | x | y | x | x | x | | | | | | | | | | | |

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| | | | | | | | | | | | | | | | | | Compressors and generators to be of super silenced type;<br>Strict Control of working hours to be maintained;<br>No out of hours working;<br>Noise monitoring. | | | | | |
| EN 02B | **NOISE**<br>Demolition activities/on Site vehicle movements | N<br>A | y<br>y | y<br>y | x<br>y | x<br>y | x<br>x | y<br>y | x<br>x | x<br>x | y<br>y | 3,5,6,8 | 4 | 5 | 20 | | No reverse beepers;<br>No idling engines;<br>Vehicles to be serviced and maintained;<br>No out of hours working;<br>Acoustic barriers if necessary/appropriate;<br>Noise monitoring. | 4 | 2 | 8 | L | EL01, EL02, EL10, EHSL02, EHSL03, EHSL04 |
| 2N 02C | **NOISE**<br>Deliveries/collections. | N<br>A | y<br>y | y<br>y | x<br>x | x<br>x | y<br>y | y<br>y | x<br>x | x<br>x | y<br>y | 3,5 | 4 | 5 | 20 | Ill health to workers and others affected by our activities;<br>Complaints from residents;<br>Legal Action by Statutory Authorities;<br>Disruption and disturbance to wildlife;<br>Failure to meet requirements laid out by Local Authority/S81. | No parking/queuing outside Site;<br>Scheduled deliveries;<br>Consideration of times of deliveries - none within school start/finishing times;<br>No out of hours deliveries. | 4 | 2 | 8 | M | EL01, EL02, EL10, EL26, EHSL02, EHSL03, EHSL04 |
| EN 02D | **NOISE**<br>Human - Site personnel/work activities + use of welfare facilities | N<br>A | x<br>x | y<br>y | x<br>x | x<br>x | y<br>y | y<br>y | y<br>y | y<br>y | x<br>x | 4,5,6,8 | 3 | 5 | 15 | | Communication radio volumes to be maintained at a low level;<br>No radios;<br>No horseplay or shouting/swearing, especially near Site perimeter;<br>All personnel to behave in a sensible manner;<br>Behavioral tool box talks;<br>Monitoring and supervision. | 3 | 2 | 6 | L | EL01, EL02, EL15, EL19, EHSL02, EHSL04 |
| EN 03A | **WASTE - CONTROLLED**<br>Demolition activities. | N<br>A<br>E | x<br>x<br>x | x<br>y<br>y | x<br>x<br>y | x<br>x<br>y | x<br>x<br>x | x<br>x<br>y | y<br>y<br>y | y<br>y<br>y | x<br>x<br>y | 7,8 | 4 | 4 | 16 | Ill health to workers and others affected by our activities;<br>Contaminated land;<br>Water pollution;<br>Air pollution;<br>Failure to meet duty of care;<br>Breach of waste legislation;<br>Breach of asbestos legislation;<br>Legal Action by statutory authorities. | Waste Management Plan - maximise re-use/recycling;<br>Segregation of water into appropriate waste streams;<br>All waste to be removed as detailed in the related Method Statement under defined conditions/control measures;<br>PPE;<br>Duty of Care Waste Transfer notes to accompany all waste leaving Site;<br>Environmental Monitoring;<br>Environmental awareness training;<br>Waste removed by licensed carriers to suitable designated facility. | 4 | 2 | 8 | M | EL01, EL02, EL03, EL04, EL05, EL06, EL07, EL08, EL09. EL18, EL19, EL20, EL21, EL26 |
| EN 03B | **WASTE - HAZARDOUS**<br>Asbestos removal - licensable and non-licensable;<br>Demolition activities - disposal of hazardouse chemicals/substances. | N<br>A<br>E | x<br>x<br>y | x<br>x<br>y | x<br>x<br>y | x<br>x<br>y | x<br>x<br>x | x<br>x<br>x | y<br>y<br>y | y<br>y<br>y | x<br>x<br>y | 7,8 | 5 | 4 | 20 | Ill health to workers and others affected by our activities;<br>Contaminated land;<br>Water pollution;<br>Air pollution;<br>Failure to meet duty of care;<br>Breach of waste legislation;<br>Breach of asbestos legislation;<br>Legal Action by statutory authorities. | All hazardous waste to be removed as detailed in the related Plan of Work/Method Statement under defined conditions/control measures;<br>PPE;<br>Hazardous Waste Consignment Notes to accompany all waste leaving Site;<br>Environmental Monitoring;<br>Environmental awareness training.<br>Waste removed by licensed carriers to suitable designated facility. | 5 | 2 | 10 | M | EL01, EL02, EL03, EL04, EL05, EL06, EL07, EL08, EL09. EL18, EL19, EL20, EL21, EL26 |
| EN 04 | **ECOLOGY**<br>Demolition activities. | N<br>A<br>E | x<br>x<br>y | x<br>x<br>y | x<br>x<br>y | x<br>x<br>y | x<br>x<br>y | x<br>x<br>y | y<br>y<br>y | x<br>x<br>y | x<br>x<br>x | N/A | 5 | 4 | 20 | Loss, destruction, harm or disturbance of wildlife or habitat;<br>Reduction in endangered species;<br>Spreading of invasive plants;<br>Legal Action by Statutory Authorities. | Monitoring;<br>Training/Toolbox Talks;<br>Issue Species Identification information;<br>Ecological Assessment/Surveys;<br>Mitigation strategies;<br>Seasonal timing of works where practicable to avoid bird nesting periods;<br>Application for appropriate licences;<br>Secure fencing to protect/segregate sensitive areas;<br>Implementation of appropriate measures (bat boxes/ toad tunnels/underpasses. etc);<br>Liaison with ecologists. | 5 | 2 | 10 | M | EL16, EL17 |
| EN 05 | **DEMOLITION ACTIVITIES**<br>Demolition activities;<br>Asbestos removal activities;<br>Site welfare. | N<br>A | x<br>x | x<br>x | x<br>x | x<br>x | x<br>x | y<br>y | y<br>y | y<br>y | x<br>x | 2,3,5,6,7 | 5 | 4 | 20 | Ill health to workers and others affected by our activities;<br>Damage/destruction to wildlife and ecology, both short and long term;<br>Damage to visual amenities;<br>Legal Action by Statutory Authorities;<br>Remediation costs. | Maintain good standards of housekeeping on Site;<br>Any hazardous fluids, including fuel and oils, to be suitably stored either in bunded containers or on bunded trays;<br>Spill kits to be available adjacent to any areas of potential spills; | 5 | 2 | 10 | M | EL01, EL02, EL03, EL04, EL05, EL06, EL07, EL08, EL09. EL18, EL19, EL20, EL21, EL26 |

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|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | E | y | x | y | y | x | y | y | y | x | | | | | | Minimise refuelling locations for plant on Site;<br>Documented emergency procedures;<br>Training, including use of spill kits + reporting spills and emergency procedures;<br>Environmental Monitoring. | | | | | |
| EN 06 | **WATER DISCHARGES/USAGE**<br>Demolition activities. | N<br>A | x<br>x | x<br>x | x<br>x | x<br>x | y<br>y | x<br>x | x<br>x | y<br>y | x<br>x | 5,7 | 5 | 4 | 20 | Contamination of groundwater/surface waters/rivers;<br>Damage/destruction to wildlife and ecology, both short and long term;<br>Potential harm to humans;<br>Failure to meet consents;<br>Legal Action by Statutory Authorities. | Ensure hoses/pipes and valves do not leak;<br>Control and monitor use of water;<br>Comply with appropriate licences/consents;<br>Minimise run off;<br>Silt fences/traps;<br>Bunded areas to contain run off;<br>Non-concussive taps;<br>Water boilers instead of kettles;<br>Training;<br>Environmental Monitoring. | 5 | 2 | 10 | M | EL12, EL13<br>EL14/ EL20 |
| EN 07 | **LIGHTING**<br>Demolition activities. | N<br>A | x<br>x | y<br>y | x<br>x | x<br>x | y<br>y | y<br>y | x<br>x | x<br>x | x<br>x | 5 | 3 | 5 | 15 | Light pollution;<br>Complaints by residents;<br>Legal Action by Statutory Authorities;<br>Disruption and disturbance to wildlife;<br>Failure to meet requirements laid out by Local Authority/S81 or planning conditions. | Careful consideration of direction of lighting away from residential areas as to minimise disruption to nearby residents;<br>Consideration of wildlife and ecology around the site boundaries;<br>All lighting to be switched off out of working hours;<br>Security lighting to be kept at a minimum. | 3 | 2 | 6 | L | EL01, EL19, |
| EN 08 | **RESOURCE USE (INCLUDING USE OF FOSSIL FUELS)**<br>Vehicle, plant and equipment usage during our work activities - demolition, asbestos removal, transportation of personnel and office personnel works. | N<br>A<br>E | y<br>y<br>y | y<br>y<br>y | x<br>x<br>x | x<br>x<br>x | y<br>y<br>y | y<br>y<br>y | y<br>y<br>y | y<br>y<br>y | y<br>y<br>y | 5,6,7 | 5 | 5 | 25 | Generation of additional waste streams;<br>Reduction of fossil fuels - either directly by use in vehicles, plant and equipment or indirectly by use of electricity and water. | Re-use/recyling of materials;<br>Vehicles, plant and equipment inspected, serviced and maintained to ensure optimum fuel performance;<br>Vehicle, plant and equipment turned off when not in use;<br>Investment in safer more efficient plant and attachments **(2021)**<br>Renewed all company vans to the latest eco engines to meet the Clean Air Zone being implemented in Birmingham in **June 2021**.<br>Switch It off Schemes;<br>Non-concussive taps;<br>Water boilers instead of kettles;<br>Awareness training;<br>Fuel and energy use monitoring and reporting. | 5 | 2 | 10 | M | EL01, EL02, EL03, EL04, EL05, EL06, EL07, EL08, EL09. EL18, EL19, EL20, EL21, EL26 |
| EN 09 | **VISUALS**<br>Demolition Site (including welfare facility) | N<br>A | x<br>x | x<br>x | x<br>x | x<br>x | y<br>y | x<br>x | y<br>y | x<br>x | x<br>x | 1,3,5,7 | 3 | 5 | 15 | Negative impact on local environment;<br>Complaints by public;<br>Breach of statutory requirements;<br>Failure to meet requirements laid out by Local Authority/S81 or planning conditions. | Careful use of lighting;<br>Clean hoardings;<br>Good site housekeeping;<br>Boundary fencing litter sweeps;<br>Considerate constructors code of practice;<br>Contact numbers clearly displayed;<br>Communication with neighbours and others who may be affected by our activities;<br>Monitoring and site inspections. | 3 | 1 | 3 | L | EL01, EL19, |

## Environmental Policy

A central part of City Demolition Contractors (Birmingham) Limited's business is the demolition, dismantling, remediation and onward sale of demolition arisings with minimal environmental impact. We aim to do this directly through our business practices and indirectly by influencing our suppliers and customers.

City Demolition's objective with regard to the environment is to ensure that we understand and effectively manage the actual and potential environmental impact of our activities. Our operations will be conducted with due consideration being given to sustainability and the limited use of natural resources. Furthermore, we are committed to reducing our carbon footprint and achieve net zero by 2050.

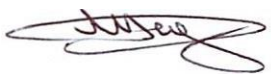
We will comply with all legal requirements in areas where we carry out our business to prevent environmental damage, make a commitment to the protection of the environment, prevention of pollution, minimising energy and resource usage and ensure that the principles of sustainable development are operated throughout all of City Demolition's operations.

We will therefore:

- Identify the significant environmental aspects and impacts from current and relevant past activities and services and, where we have direct control or can be expected to have an influence, implement an appropriate environmental management system;
- Minimise and where reasonably practicable eliminate any adverse impact on the environment arising from the activities of our business;
- Minimise the use of energy, resources consumed, and waste produced while undertaking our business activities in a safe and professional manner;
- Support the reduction, reuse and recycling of materials and ensure the legal disposal of all waste arising from the activities of our business;
- Develop a Carbon Reduction Plan and closely monitor our GHG emissions and improvements in the way we operate and manage the service we deliver;
- Comply with legal requirements and where appropriate go beyond compliance with the minimum environmental requirements of legislative bodies and our customers;
- Make appropriate resources available to manage the environment and ensure human resource roles, responsibilities and authorities are defined;
- Ensure that all staff whose work may create a significant impact upon the environment are provided with adequate and appropriate information and training and are competent in environmental matters;
- Inform and train our staff in understanding and fulfilling their environmental responsibilities and those of the company;
- Establish and measure environmental performance against objectives and/or targets;
- Regularly review our environmental management system at senior management level with a view to continually improving our environmental performance.

This policy shall be communicated to all employees and suppliers and shall be available to all interested parties on request.

Signed:



Mark Doyle
Managing Director
December 2023

**Date of next review:**
**December 2024**

| Complaint details | | | | | | Complaint status | | Stage 1 - Investigation | | | | | | | Stage 2 - Review | | | | | | | | Notes |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Complaint received | Complaint addressed to? (e.g. RMD) | Customer name | Customer address | Homeowner? (Y/N) | Complaint summary | Status | Date closed | Complaint confirmation due | Complaint confirmation sent | Complaint allocated to | Target response date | Time extension notified | Stage 1 response issued | Response time | Stage 2 review requested | Stage 2 confirmation due | Stage 2 confirmation sent | Review allocated to | Target response date | Stage 2 response issued | Response time | |
| | | | | | | | | *03/01/1900* | | | | | | | | | | | | | | *e.g. any other important information about the complaint.* |