SITE ENVIRONMENTAL MANAGEMENT PLAN

Toureen Contractors

The Other House – TCL1467

202-206 Buckingham Palace Road,

London, SW1W 9SX

	Name	Position	Signature	Date
Prepared By	Becky Head	Sustainability Manager	*B. Head*	04/11/2024
Reviewed By	Claire Fundrey	Environmental and Sustainability Manager	*C. Fundrey*	06/11/2024
Approved By	Andy Fox	Project Director	*A. Fox*	25/11/2024

Revision Log:

Site amendments to the contents of this Site Environmental Management Plan (SEMP) are to be recorded below.

Examples include changes to site management personnel, site operations, statutory legislation or omissions and lessons learned in the event of an incident. Following planned reviews any amendments are to be recorded here including reference to the date of the review and location of the review records.

Site-Specific Amendments:

Amendment No.	Description	Revised By	Date
Rev 00	First Issue	B. Head	25/11/2024
Rev 01	Update to incorporate WCC comments – TBC final comments	C. Fundrey	15/01/2025
Rev 02	Update to incorporate final WCC Comments	B. Head	31/03/2025

Table of Contents

1 Introduction:

This Site Environmental Management Plan (SEMP) has been written for The Other House with the intent on providing an outline for planning and managing environmental matters onsite and ensuring compliance with Westminster Councils Code of Construction Practice (CoCP).

This document identifies and summarises issues relevant to the works and contains a set of procedures for managing each significant environmental issue.

The plan has been produced using our experience and knowledge of typical construction methods considered applicable for a development of this scope.

The purpose of this SEMP is to:

- Identify environmental aspects of the works.
- Assisting project delivery team reducing risks of adverse impact arising from project activities.
- Identify stakeholders' requirements.
- Set out company policy and procedures in compliance with our IS0 14001:2015 Environmental Management System.
- Ensure compliance with legal requirements.

2 Project Details:

2.1 Site Location:

The site is located at address: 202-206 Buckingham Palace Road, London, SW1W 9SX within the administrative area of Westminster City Council.

Planning application reference: 24/02294/FULL

The site was the location of the former Belgravia Police Station and is bound by Semely Place to the north, Buckingham Palace Road to the east, Fountain Court to the south, and Ebury Square to the west.

2.2 Site Surroundings / Interested Parties:

There are several sensitive receptors near the site. Directly neighbouring the site to the southwest is Fountain Court Residents. The other side of Buckingham Palace Road is Consort Rise House apartment building. Within 1km of the site is Battersea Park Nature Area which is designated as a Local Nature Reserve.

There are multiple listed buildings surrounding the site, including the National Audit Office and Victoria Coach Station.

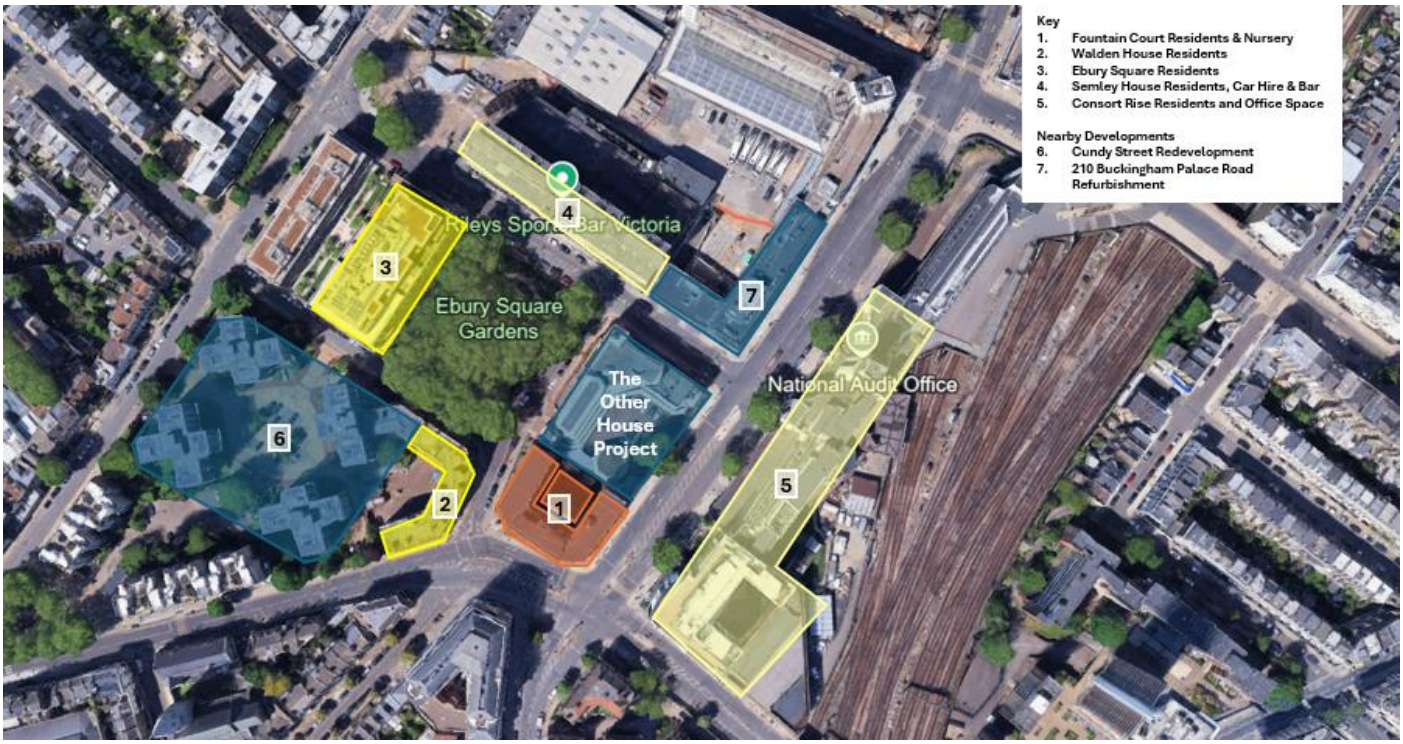


Figure 1 – Site location and nearby sensitive receptors

2.3 Programme of Works / Methodology:

A draft works sequence programme has been developed during planning stage – see Appendix A. A flexible approach to planning, logistics and programming of the project will be required to incorporate both the best practices currently available and future trade contractor input. Additional site investigations are required to confirm the intended methodology.

Prior to the commencement of works the contractor will carry out all necessary site investigations.

It should be noted that the commencement of works is dependent upon the discharge of Pre-Commencement Conditions and the appointment of trade contractors. The client and appointed contractor will carry out all necessary site investigations.

2.4 Scope of works:

The overall development includes part demolition, part retention (of existing basement and structural frame) and redevelopment to create a building of basement, ground and seven upper floors with rooftop plant and two storey building and single storey infill to courtyard, to provide new hotel with ancillary uses, including restaurant, bar, gym, and spa facilities; cycle parking, landscaping, and associated works. (Site of former Belgravia Police Station).

The scope of works for this SEMP includes the demolition, enabling, piling and construction of superstructure works including, but not limited to the following:

- Removal of existing façade
- Partial demolition of structure
- Removal of redundant drainage
- Foundation and column strengthening works
- Construction of foundations
- Piling
- Installation of drainage
- Excavation for pool, lifts, and plant
- Waterproofing of basement
- Construction of superstructure

2.5 Hours of Work:

Works outside these hours in the event of emergencies or planned works that for reasons of public safety or amenity or engineering reasons are best carried out during other periods will be subject to agreement with Westminster Borough Council.

2.5.1 Notification of Late Working – Overruns:

As soon as it becomes apparent that work will overrun beyond 18:00 the EHO for WCC and WCC Environmental Sciences needs to be informed by email:

- Anthony Robinson (Environmental Health Officer: arobinson2@westminster.gov.uk
- Westminster Environmental Health: cocp@westminster.gov.uk

2.6 Site Logistics

The site plan including site establishment, security, positioning of welfare and logistics are detailed within the project's Construction Logistics Plan (CLP).

A 2.4m height hoarding will be maintained around the site with vehicle and pedestrian gates as outlined in the CLP. It is intended that panels of green hoarding will be provided on the elevation overlooking Buckingham Palace Road. Depending on the option selected, it will be maintained by an irrigation system connected to the water supply. Once Toureen's phase of works is complete, the follow-on contractor will take over plant maintenance.

2.7 Project Management Structure:

Client		Project Management / Quantity Surveyor	
Name	The Other House	Name	Gardiner & Theobald LLP
Address	3rd Floor, Holden House, 57 Rathbone Place, London, W1T 1JU	Address	10 South Cresent, London, WC1E 7BD
Contact	Freddie Gibbons - Development Manager	Contact	Taylor Tunstall - Associate Director
Email	Freddie@otherhouse.com	Email	t.tunstall@gardiner.com
Principal Contractor		**Planning Consultant**	
Name	Toureen Contractors Ltd	Name	DP9
Address	25 Cecil Road, Harrow, HA3 5QY	Address	100 Pall Mall, London, SW1Y 5NQ
Contact	Andy Fox - Project Director	Contact	Tom Sweetman - Director (Lead)
Email	Andy.Fox@Toureen.co.uk	Email	tom.sweetman@dp9.co.uk

2.7.1 Construction Phase - Roles & Responsibilities:

The Project Manager has overall responsibility for environmental issues onsite with Toureen Environmental and SHEP Managers guidance and advice.

All roles are defined in Toureen Group responsibilities and duties procedures.

Title	Name	E-Mail
Managing Director	Ciaran McClearn	Ciaran.McClearn@toureen.co.uk
Project Director	Andy Fox	Andy.Fox@toureen.co.uk
SHEP Manager	Matt Gifford	Matt.Gifford@toureen.co.uk
Environmental Manager	Claire Fundrey	Claire.Fundrey@toureen.co.uk
Project Manager - Demolition	Peter Edgerton	Peter.Edgerton@toureen.co.uk
Project Manager - Civils	Shahab Din	Shahab.Din@toureen.co.uk

3 Planning:

3.1 Environmental Aspects & Impacts:

Environmental aspects and impacts have been identified and assessed prior to the start of works and are available in the Environmental Aspect and Impact Risk Assessment for the project, incorporated into the work activity RAMS – Risk Assessment and Method Statements.

The significance of an aspect will be determined through the assessment of key drivers including legal requirements; level of risk to the environment and level of risk to the business.

3.2 Project Targets:

As part of the overall management of the project, Toureen will set targets and objectives employing environmental good practice to minimise effects on the natural environment and surrounding community.

Objective	Target
Effective Environmental Controls	Zero environmental harm. • No oil or fuel spills, leakage of contaminant. • No harm to ecological receptors. • No damage to ground or surface water.
Waste	Achieve at least 95% diversion from landfill of non-contaminated waste - aim for zero non-hazardous waste to landfill. Maximise reuse and recycling of waste arisings. Minimise waste produced from construction as far as reasonably practicable, reducing avoidable wastes.
Carbon / Air Quality	Maximise energy efficiency & minimise exhaust emissions. Reduce idling. Collaborate with stakeholders to utilise low carbon alternative materials. Prioritise local procurement and suppliers.
Sustainable materials and efficient use of resources	All timber used onsite to be FSC or PEFC certified sustainably sourced.

Objective	Target
	Use sustainable and responsibly sourced key construction materials where specified – (BES 6001, CARES SCS, EPD's etc.). Maximise water use efficiency, adopt rainwater harvesting where practicable.
Community Impact	Maximise our positive contribution to the local community. Zero complaints of nuisance – noise, vibration, Air Quality (Dust), Lighting.
Considerate Constructors Scheme (CCS)	Achieve a score of at least 40 in CCS scheme audits and a minimum score of 8 for Environmental section.
BREEAM Targets	The development is targeting a rating of BREEAM Outstanding with a score of 86.1%, with the potential of increasing the score to 89.5%.

3.3 Environmental Legislation and Regulatory Liaison:

A register of Environmental Legislation is maintained online using the Newground Legislation Update Service.

All works will be conducted in compliance with the requirements of applicable environmental law and also comply at all times with any other mandatory requirements such as those specified by relevant local planning, highways and environment health authorities, or the relevant statutory agency.

In addition, compliance with published standards, accepted industry practices, national guidelines, and codes of practice appropriate to our works package.

Regulatory organisations include, but are not limited to:

- Environment Agency (EA) - England and Wales.
- Natural England (NE).
- Local Authority (LA) – Westminster Council.
- Water companies.

4 Operational Controls:

The controls described below apply to all staff, suppliers and third parties associated with the project and covers all activities and operations.

4.1 Liaison with Interested Parties and Complaints:

Toureen will work closely with the client to actively communicate with neighbours in writing, regarding the work taking place when noise levels are expected to be significant including: the start date, estimated duration and nature of the project, details of contact names and numbers of appropriate site personnel.

As the closest neighbours to the site, residents of Fountain Court will be kept well informed throughout the project to ensure clear and timely communication about construction activities.

Prior to the works phase a resident meeting will be conducted and monthly newsletters with information also published on project dedicated website and on the site hoarding notice board.

We aim to meet at monthly intervals with the neighbours, Client, and Local Authority Environmental Health Officers to discuss works progress and any issues.

4.1.1 Considerate Construction Scheme:

The site will be registered and compliant to the Considerate Constructor Scheme. Toureen target is to achieve a score of at least 40 in CCS scheme audits.

4.2 Complaints:

Any complaints received during the works are to be immediately acknowledged and a commitment to respond within 48 hours provided to the sender.

The Project Manager will consult with other stakeholders and provide any required monitoring data (if in relation to noise, dust, or vibration concerns) so a response to the complainant can be best accommodated providing all details of actions taken and establishing feedback communication channels. If the impacts of construction can be further mitigated such options will be fully investigated and further monitoring may be implemented if necessary. Any findings and remedial actions taken will be fed back to the complainant and record sent to client.

Where deemed necessary, appointed consultants will undertake a more detailed investigation of the complaint. The project manager will consult other stakeholders and consultants on the appropriate course of action and any corrective actions to be undertaken in response to this investigation.

The results of any such assessment and investigation will be reported back to any interested parties, including Westminster Borough Council.

All complaints received and remedial actions taken will be recorded to identify trends and prevent any re-occurrence. A telephone “Hot Line” for information and reporting will be provided and displayed on site fencing.

4.3 Nuisance Prevention:

Toureen Contractors will use mitigation measures at this project to ensure minimum adverse impact on surrounding sensitive receptors.

We will apply Best Practical Means (BPM), as defined under Section 72 of the Control of Pollution Act (COPA) 1974. Consideration to local residents and businesses will be given when positioning and directing lighting during winter working days. Lighting shall be suitable and sufficient whilst preventing nuisance to local people, site vehicle operations, or other transportation.

It is intended that a Section 61 agreement will be applied for the works with Westminster Council. The environmental monitoring to be implemented at this project will be as outlined within the Noise, Vibration and Dust Management Plan (NVDMP) and Section 61 application for this project.

4.3.1 Addressing Cumulative Project Impacts

Currently there are 2no operational construction sites in the immediate vicinity of the 202-206 Buckingham Palace Road site. These are:

- Willmott Dixon – Refurbishment Project – Corner of Semley Place and Buckingham Palace Road.
- Keltbray – Construction Project – Cundy Street.

Close liaison with these sites will be maintained.

4.3.2 Environmental Monitoring Approach:

Baseline monitoring for (Noise, Vibration and Dust) will carried out by independent monitoring consultant. Further monitoring during the works will be carried out in line with the Noise, Vibration and Dust Management Plan (NVDMP). Trigger levels for noise 1 hour and 10 hour LAeq have been defined within the NVDMP and Section 61 application.

Vibration levels will be monitored according to the methods set out in BS 6472: 2008.

There will also be on-going liaison with WCC Environmental Department regarding the control measures set in place regarding noise, vibration, and dust related issues.

The environmental monitoring to be implemented at this project will be real-time 24 hours. Reporting and detailed monitoring regime, including proposed monitoring locations and Noise predictions will be agreed via Section 61 application in full compliance with Westminster Code of Construction Practice and Noise Control Guidance.

Trigger levels will be stipulated within the Section 61 and the location of monitoring points are included within the NVDMP.

4.3.3 LANAF Risk Assessment

The potential noise impacts for The Other House project have been assessed using the Noise Site Risk Assessment (LANAF Methodology) – London Good Practice Guide: Noise & Vibration Control for Demolition and Construction.

A - Locality and Site Information Risk Assessment:

Locality / Site Information	Low	Medium	High
Programme Duration			
<6 months			
6 months to 12 months			
>12 months			X
Proximity of nearest sensitive receptors			
>50m from the site boundary			
Between 25m and 50m			
<25m			X
Day-time Ambient Noise Level			
High ambient noise level			
Medium ambient noise level			
Low ambient noise level			X
Working hours			
Normal working hours only^	X		
Some extended evening or weekend working			
Some night-time working			
SUBTOTAL A			
Add up the number of ticks in each column	**1**		**3**

B - Works Information:

Works Information	Low	Medium	High
Location of works			
Majority within existing complete building envelope		X	
Majority of works external			
External demolition			
Limited to 2 weeks[12]			
External demolition between 2 weeks and 3 months[12]			
External demolition greater than 3 months[12]			X
Ground works			
Limited to non-percussive methods (i.e. hand tools / small excavator / small backhoe)			
Percussive methods[13] less than 3 months[12]		X	
Percussive methods greater than 3 months[12]			
Piling			
Limited to 1 week[12] [14]	X		
Bored piling only. No impact or vibratory piling			

Works Information	Low	Medium	High
Impact or vibratory piling			
Vibration generating activities			
Limited to less than 1 week	X		
Between 1 week and 1 month			
Greater than 1 month			
Street management			
Required for less than 1 week / or not at all	X		
Required for less than 1 month			
Required for greater than 1 month			
SUBTOTAL B			
Add up the number of ticks in each column	3	1	1

Total Risk Assessment:

Assessment Criteria	Risk		
	Low	Medium	High
Risk Assessment A - Subtotal	1		3
Risk Assessment B – Works Information For the highest number of ticks in SUBTOTAL B, 1 tick to the equivalent risk comment	✓		
Total	**2**		**3**

4.3.3.1 Good Practice Measures

Good practice measures to be adopted in line with the LANAF assessment.

	Mitigation for all Risk Sites	Mitigation Measures to be considered highly recommended for high-risk sites
General Considerations	Designated site-based staff must have the authority to ensure noise and vibration are properly controlled and managed based on site circumstances. All site staff must be briefed on their responsibilities regarding Best Practicable Means (BPM) for minimising construction noise and vibration, along with relevant planning consents, codes of construction, or legal agreements. Staff training on noise and vibration	Submit a Section 61 consent application to the local authority Adhere to 'quiet hours' as agreed and/or adopted by the local authority. Maximise the screening effect of buildings and temporary stockpiles through programming / phasing of works. Use rubber linings in chutes, dumpers and hoppers to reduce impact noise.

	Mitigation for all Risk Sites	Mitigation Measures to be considered highly recommended for high-risk sites
	management should be regularly reviewed and repeated throughout the project. Site hoarding must be built and maintained to reduce noise levels for sensitive buildings and land uses. Contact details of the contractor and responsible site manager, along with working hours and other site information, should be displayed on the hoarding. Site access should be located away from noise-sensitive receptors. Internal haul routes must be well maintained and avoid steep gradients. Limit material and plant loading/unloading to normal working hours. Reduce loading/unloading heights for muck away and material movement to mitigate noise impact. Handle all materials in a way that minimises noise. Consider joining the Considerate Constructors Scheme. Consult WCC's Code of Construction Practice.	Minimise opening and closing of site access gates through good coordination of deliveries and vehicle movements.
Plant	Ensure that each item of plant and equipment complies with the noise limits quoted in the relevant European Commission Directive 2000/14/EC, United Kingdom Statutory Instrument (SI) 2001/1701. Fit all plant and equipment with appropriate mufflers or silencers of the type recommended by the manufacturer. Follow manufacturer's guidance and measures to operate plant and equipment and use it in a manner which minimises noise. Use all plant and equipment only for tasks for which it has been designed for. Shut down all plant and equipment in intermittent use in the intervening periods between works or throttle it down to a minimum.	If possible power all plant and equipment by mains electricity or other quieter technology rather than locally powered sources such as generators. Maximise screening from existing features / structures, or employ the use of full or partial enclosures for fixed plant. The enclosures should be well maintained. Fixed plant can include generators, compressors, pumps, batching plant and ventilation plant. Locate and orientate fixed or semi-static plant away from noise sensitive receptors. Consider additional measures to control noise for any plant required to operate on a 24-hour basis; for example, dewatering pumps or generators used to power site security. Vibratory compaction equipment shall be used in a mode which minimises the incident vibration at nearby residential and other sensitive properties.

	Mitigation for all Risk Sites	Mitigation Measures to be considered highly recommended for high-risk sites
Vehicle Activity	Ensure all vehicle movements occur within normal hours or at agreed times, taking into account the primary function of sensitive receptors in the vicinity (i.e. avoiding school drop-off/pick-up periods). Maximise the reuse of any waste arising on site to minimise vehicle movements. Plan deliveries and vehicle movements so that vehicles are not waiting or queuing on the public highway. If waiting or queuing is unavoidable then engines should be turned off. Minimise opening and closing of site access through good coordination of deliveries and vehicle movements.	Plan site layout to ensure that reversing is kept to a practicable minimum, and where practicable eliminated altogether. Where reversing is required, use broadband reverse sirens / alarms or, where it is safe to do so, disengage all sirens and alarms and use banks-men. Produce a robust Construction Traffic Management Plan to plan, manage and minimise vehicle movements. Avoid unnecessary impact on sensitive receptors, traffic diversions via other sensitive areas or bottlenecks (see TfL guidance). Consider potential accumulation of traffic from other local construction sites and plan delivery routes and times to avoid congestion. Rubber/ Neoprene (or similar non- metal lining material) matting to line the inside of material transportation vehicles so as to avoid the 'first drop' high noise levels. Where site space is limited and volume of vehicles attending site is high, seek vehicle holding bay(s) to use with 'Just in time' delivery management systems Space planning for stockpiling of material (over weekends and, evening and nights) within the site to allow removal during normal working hours only. Consider alternative means of transport, e.g. river and rail
Demolition Phase	Employ the use of acoustic screening; this can include planning the demolition sequence to utilise screening afforded by buildings to be demolished.	If working out of hours on safety grounds, limit high noise/vibration demolition activities to normal hours wherever practicable. Avoid demolition activities outside of normal working hours through the use of temporary measures, such as safety / protection fences, to enable works to be conducted during normal working hours. Utilise low impact demolition methods such as non – percussive plant wherever practicable Use rotary drills and "bursters" activated by hydraulic or electrical power, or chemically based expansion compounds, to facilitate fragmentation and excavation of hard material. Avoid the transfer of noise and vibration from demolition activities to adjoining occupied buildings through cutting any vibration transmission path or by structural separation of

	Mitigation for all Risk Sites	Mitigation Measures to be considered highly recommended for high-risk sites
		buildings. Rather than breaking in-situ, consider the removal of larger sections by lifting them out and breaking them down either in an area away from sensitive receptors or off-site.
Groundworks and Piling	Avoid percussive piling wherever possible.	If working outside of normal hours on safety grounds, limit major excavation works to normal working hours. Adopt the following hierarchy of groundwork / piling methods, in order of preference to minimise the impact of piling, if ground conditions, design and safety allows: Pressed-in methods, e.g. Hydraulic jacking, Auger / bored piling, Diaphragm Walling, Vibratory piling or vibro-replacement, Driven piling or dynamic consolidation Consider the location and layout of the piling plant for efficient operation and potential noise control of generators and any electric or hydraulic motors used by plant. Where impact piling is the only option, utilise a non-metallic dolly between the hammer and driving helmet, or enclose the hammer and helmet within an acoustic shroud. Consider concrete pour sizes and pump locations. Plan the start of concrete pours as early as possible within normal working hours to avoid overruns. Where obstructions are encountered stop works and review approach; adopt work methods that minimise noise and vibration. Prepare pile caps using methods / procedures which minimise the use of breakers, e.g. using hydraulic splitters to crack the top of the pile
Construction	When working within a building ensure all openings (e.g. windows and doors) are closed or sealed up. Plan the site layout to maximise screening from existing features / structures.	Use prefabricated building structures or elements to minimise noise on site. Where on-site fabrication is unavoidable, all high noise level works should be carried out within normal hours. Consider concrete pour sizes and plan the start of concrete pours as early as possible within normal working hours to avoid overruns. Where practicable consider using an on- site, noise attenuated, concrete batching plant to minimise overruns and disturbance from queuing delivery wagons from off-site and

	Mitigation for all Risk Sites	Mitigation Measures to be considered highly recommended for high-risk sites
		remote facilities. Obtain and agree a protocol with concrete suppliers and sub-contractor with measures to ensure that as far as practicable overruns on concrete pours do not occur.
Monitoring	Establish pre-existing levels of ambient noise. Carry out attended noise monitoring at the start of any new phase of works, to check source sound emission data from plant on-site and following any complaints. Carry out regular on site observation monitoring and checks/ audits to ensure that BPM is being employed at all times. Such checks should include: • Hours of working • Presence of mitigation measures, equipment (engine doors closed, airlines not leaking, • etc.) and screening (location and condition of local screening, etc.) • Number and type of plant • Construction method, and • Where applicable, any specific Section 61 consent conditions. The site reviews should be logged and any remedial actions recorded.	Monitor noise continuously during demolition, piling, excavation and sub- and superstructure works at agreed locations and report to the local authority at agreed intervals. Monitor vibration continuously during demolition, piling, excavation and sub-structure works at agreed locations and report to the local authority at agreed intervals. Appraise and review working methods, procedures and logistics on a regular basis to ensure continuous development of BPM. Establish level trigger alerts in agreement with the local authority and guided by BS5228. Monitor noise and vibration to trigger text alerts; where levels exceed the triggers then inform the local authority, review work practices and agree additional mitigation measures with the local authority. Use monitoring equipment with web access capabilities to view and inspect real time measurement and/or audio data.
Communication and Liaison	Develop a Community Liaison Plan. Develop a Complaint Procedure (see Appendix 6) with timescales for responses and a nominated liaison person to engage with residents and to handle complaints. These should be agreed with the local authority. Display contact details for the site manager and liaison officer prominently on the site hoarding. Brief all site staff regarding the complaints procedure and mitigation requirements and their responsibilities to register and escalate complaints received.	Send regular updates at appropriate intervals to all identified affected neighbours via newsletter and posting information on the site hoarding. Also make information available via email when requested. Develop and maintain a website to provide information about the project and to receive feedback. Arrange regular community liaison meetings at appropriate intervals including prior to commencement of project. Respond to issues raised and report back to attendees. Arrange meetings and communicate on a regular basis with neighbouring construction

	Mitigation for all Risk Sites	Mitigation Measures to be considered highly recommended for high-risk sites
		sites to ensure activities are coordinated to minimise any potential cumulative issues. Advise neighbours about reasons for and duration of any permitted works outside of normal working hours. Arrange meetings and communicate on a regular basis with the local authority to monitor the progress of the works and to consider any concerns or complaints raised by the local community.

4.3.4 Air Quality and Dust Control Measures:

An Air Quality Assessment (report reference 6848-1) has been carried out by Redmore Environmental which assessed potential impacts associated with fugitive dust emissions during the construction phase of The Other House development.

The assessment was conducted in accordance with the methodology outlined within the Mayor of London's 'The Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance.' Subject to implementation of site-specific dust control measures outlined in the report, residual air quality impacts from dust generated by demolition, earthworks, construction and track out activities are predicted to be not significant.

As indicated in the table below, the potential risk of dust soiling was determined to be medium from demolition and construction and low from earthworks and track out from this assessment. The potential risk of human health impacts is medium from construction, low from demolition and earthworks and negligible from track out.

Potential Impact	Risk			
	Demolition	Earthworks	Construction	Track out
Dust Soiling	Medium	Low	Medium	Low
Human Health	Low	Low	Medium	Negligible

As such Toureen will adopt the medium level Best Practicable Means (BPM) dust control measures will be adopted at all times in line with the Mayor's SPG and IAQM guidance.

Measure	Scale and Risk		
	Small	Medium	Large
Develop and implement a stakeholder communications plan that includes community engagement before work commences on-site.			
Display the name and contact details of person(s) accountable for air quality and dust issues on the site boundary. This may be the environment manager/engineer or the site manager.			
Display the head or regional office contact information.			
Record all dust and air quality complaints, identify cause(s), act appropriately to reduce emissions in a timely manner, and record the measures taken. Make the log available to LPA if required.			
Record any exceptional incidents that cause dust and/or air emissions, either on- or offsite, and the action taken to resolve the situation in the logbook.			
Hold regular liaison meetings with other high risk construction sites within 500m of the site boundary, to ensure plans are coordinated and dust and particulate matter emissions are minimised. It is important to understand the interactions of the off-site transport/deliveries which might be using the same strategic road network routes.			
Undertake daily on-site and off-site inspection, where receptors (including roads) are nearby, to monitor dust, record inspection results, and make the log available to the local authority when asked. This should include regular dust soiling checks of surfaces such as street furniture, cars, and windowsills within 100m of site boundary, with cleaning to be provided if necessary.			
Increase the frequency of site inspections by the person accountable for air quality and dust issues on site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions.			
Agree dust deposition, dust flux, or real-time PM10 continuous monitoring locations with the Local Authority. Where possible commence baseline monitoring at least three months before work commences on site or, if it a large site, before work on a phase commences. Further guidance is provided by IAQM on monitoring during demolition, earthworks, and construction.			
Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible.			
Erect solid screens or barriers around dusty activities or the site boundary that are at least as high as any stockpiles on site.			

Measure	Scale and Risk		
	Small	Medium	Large
Fully enclose site or specific operations where there is a high potential for dust production and the site is actives for an extensive period			
Avoid site runoff of water or mud.			
Keep site fencing, barriers and scaffolding clean using wet methods.			
Remove materials that have the potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re- used on-site cover as described below.			
Cover, seed or fence stockpiles to prevent wind whipping.			
Ensure all NRMM meet the highest emission standards, where applicable.			
Ensure all vehicles switch off engines when stationary - no idling vehicles.			
Avoid the use of diesel and petrol powered generators and use mains electricity or battery powered equipment where practicable.			
Impose and signpost a maximum-speed-limit of 15 mph on surfaced and 10 mph on unsurfaced haul roads and work areas (if long haul routes are required these speeds may be increased with suitable additional control measures provided, subject to the approval of the nominated undertaker and with the agreement of the local authority, where appropriate).			
Implement a Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking, and car-sharing).			
Only use cutting, grinding, or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g. suitable local exhaust ventilation systems.			
Ensure an adequate water supply on the site for effective dust/particulate matter suppression/mitigation, using non-potable water where possible and appropriate.			
Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate.			
Ensure equipment is readily available on site to clean any dry spillages and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.			
Avoid bonfires and burning of waste materials.			
DEMOLITION SPECIFIC			

Measure	Scale and Risk		
	Small	Medium	Large
Soft strip inside buildings before demolition (retaining walls and windows in the rest of the building where possible, to provide a screen against dust).			
Ensure effective water suppression is used during demolition operations. Handheld sprays are more effective than hoses attached to equipment as the water can be directed to where it is needed. In addition high volume water suppression systems, manually controlled, can produce fine water droplets that effectively bring the dust particles to the ground.			
Avoid explosive blasting, using appropriate manual or mechanical alternatives.			
Bag and remove any biological debris or damp down such material before demolition.			
EARTHWORKS SPECIFIC			
Re-vegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable.			
Only remove the cover in small areas during work and not all at once.			
CONSTRUCTION SPECIFIC			
All contractors and sub-contractors to be made aware of and sig-up to the dust management scheme.			
Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place.			
Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery.			
For smaller supplies of fine power materials ensure bags are sealed after use and stored appropriately to prevent dust.			
TRACKOUT SPECIFIC			
Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material tracked out of the site. This may require the sweeper being continuously in use.			
Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport.			

Measure	Scale and Risk		
	Small	Medium	Large
Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable.			
Record all inspections of haul routes and any subsequent action in a site logbook.			
Install hard surfaced haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowsers and regularly cleaned.			
Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).			
Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits.			

4.3.4.1 Non-Road Mobile Machinery:

Non-road mobile machinery (NRMM) will be in full compliance with NRMM emissions requirements (NRMM between 37kW and 560kW to meet EU Directive 97/68/EC) and its subsequent amendments.

The project is in the Central Activity Zone where engine emissions requirements are Stage IV. Plant used on site will be registered and compliant with this Non-Road Mobile Machinery Regulations for London.

4.3.4.2 On-Road Vehicles

Our Construction Logistics Plan includes the requirement for all vehicles servicing the project to be compliant to London low-emission zones (LEZs).

4.4 Lighting Control:

Our lighting strategy is in accordance with ‘Guidance Notes 01/20 For The Reduction Of Obtrusive Light’ and is as follows:

- Identifying the sensitive receptors surrounding the site.
- Positioning/directing lighting away from these sensitive receptors.
- Using directional lighting.
- Using appropriate levels of illumination.
- Lighting areas only when and where required.
- Installing hoods, shields, reflectors, and baffles to mitigate or reduce light spillage.

We will promote a “switch off” scheme which will avoid unnecessary light pollution from site compounds or site offices. We will use an appropriate powered light, considering that the maximum deemed to be suitable for exterior security lighting is 2000 lumens or 150w.

4.5 Waste Management:

A pre-commencement waste forecast will be produced prior to works commencing on site. The main waste streams, nearest waste management facilities and re-use and recycle opportunities will be recorded and incorporated into the waste management process.

The waste hierarchy will be applied throughout the duration of the project. The works shall be carried out in such a way that, as far as is reasonably practicable, the amount of spoil and waste to be disposed of is minimised.

Waste will be segregated onsite where possible and stored in a designated area before collection and disposal by a licenced contractor to an appropriately licenced waste destination in accordance with the Duty of Care and all other relevant environmental legislation. If segregation onsite isn’t possible the waste will be taken offsite for segregation by a specialist contractor.

All waste sent offsite will be recorded, with quantities of which is reused, recycled, recovered, or landfilled reported.

Licenced contractors will remove any hazardous waste arising in accordance with applicable environmental and health and safety regulations and a consignment note obtained.

All waste transfer notes, consignment notes and waste contractor licences will be retained onsite, waste transfer notes for two years and all hazardous waste consignment notes for three years.

Containers and skips will be covered with sheeting during transit to prevent waste escaping onto the public highways when leaving site.

4.6 Water Management:

Water consumption shall be minimised as far as possible during the works through monitoring, recording, and reporting. The possibility of using grey water sources will be explored where practicable.

Nothing except clean uncontaminated rainwater will be allowed to enter foul or surface water drains without gaining appropriate consents. All site discharges will be done in compliance with the relevant consent, with regular monitoring and testing conducted as specified by the conditions of consent. Non-compliant discharges will be stopped immediately, and controls or alternative disposal sought until the discharge becomes

compliant again.

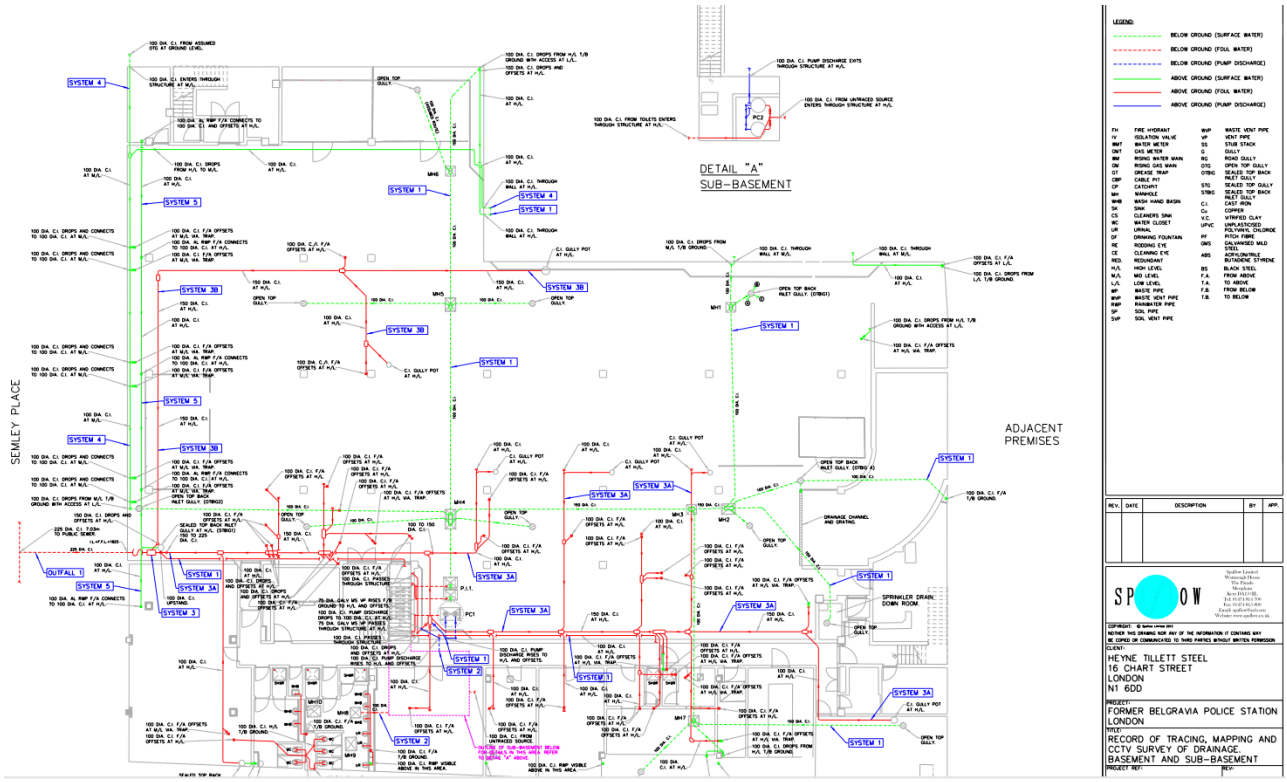


Figure 4 - Site Drainage Map.

Surface and groundwater will be managed using best practice to avoid risk of pollution during the development.

- Fuel, oil and chemicals will be stored in compliance with Oil Storage Regulations and away from drains and watercourses.
- Plant and vehicles will be maintained in good working order to prevent leaks.
- Drip trays and plant nappies will be used under static plant and at refuelling locations.
- Emergency response procedures would be established to deal with instances of leakages or spillages of potentially contaminating substances.
- Emergency spill kits will be located in strategic locations and personnel trained in their effective use.

Figure 5 shows the EA's surface water flooding map, the site is largely at a very low risk of flooding from surface water (<0.1% Annual Exceedance Probability). The southern corner is at a low risk which is expected to be a result of the existing topography and a low point in the brick paving that generally slopes towards the public highway.

Data available from historical boreholes indicates that the shallow groundwater table is present at 8m below ground level. The site is not located within a Groundwater Source Protection Zone, however, there is a Groundwater Source Protection Zone II (SPZ2 - outer protection) 490m southeast of the site. Localised perched water may also be present associated with any Made Ground at the site.

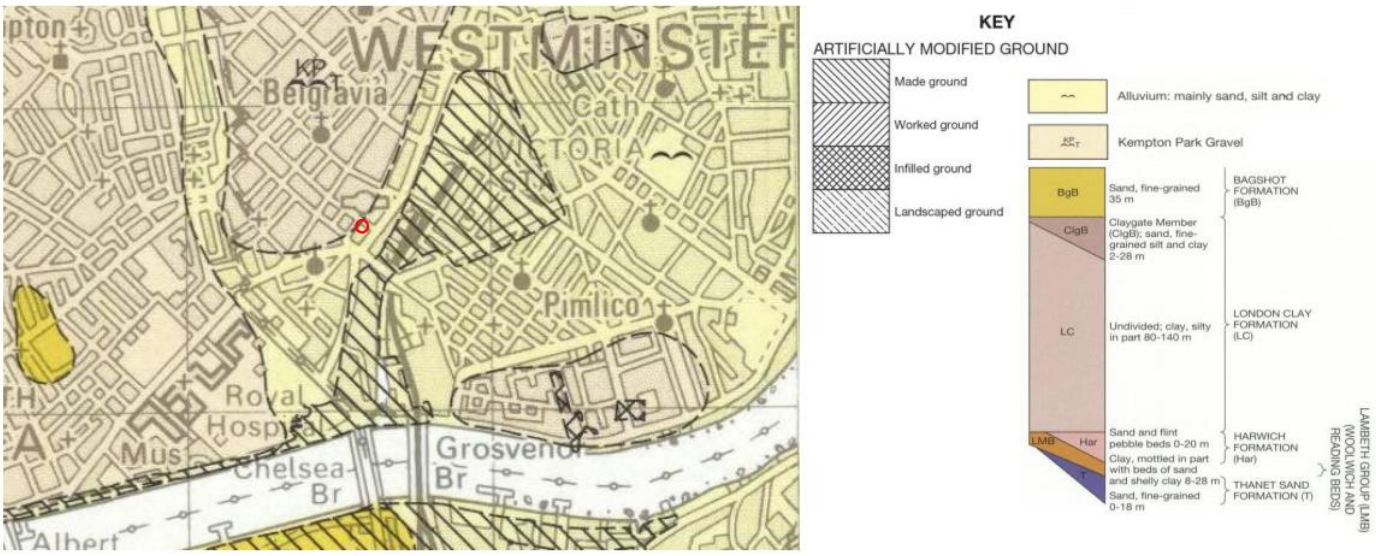
Figure 5 – EA Flood Risk from Surface Water map.

4.7 Contaminated Land:

Site assessments and ground investigations form basis for identifying the potential for contaminated land in both soil and groundwater in accordance with industry guidelines.

Figure 6 shows the location of the development within the context of a regional geological map. The map illustrates the spatial distribution of superficial (drift) deposits and bedrock outcrops at the ground surface. Made Ground is generally not shown but is assumed to be present on site due to historical demolition and construction works.

The geology map indicates that the site is located at the southern boundary of the Kempton Park Gravels, on the border with the superficial Alluvium. The London Clay Formation is present beneath the superficial deposits and is underlain by the Lambeth Group over Thanet Sands overlying Chalk.



Approximate site location marked by red circle.

Figure 6 – Geology Map

The desktop study and site investigation sampling undertaken identified no contamination present onsite, approval for the Site Investigation will be sought from Westminster for the project.

Any excavation works will be monitored for any unexpected or unusual materials with contamination potential. This could include, but not limited to; buried drums, tanks or containers, soil, groundwater, or liquids with an unusual colour.

In the event that the works discover contaminated land, project team will stop works in the area to identify the nature and extent of contamination, inform the Client and undertake/amend risk assessments.

Contaminated materials will be segregated from uncontaminated materials in designated contained areas designed to prevent release of any contamination.

4.8 Unexploded Ordnance (UXO):

A preliminary Unexploded Ordnance (UXO) Threat Assessment for the site was carried out by Brimstone UXO Ltd in accordance with CIRIA C681 Guidelines: ‘Unexploded Ordnance, a Guide for the construction Industry’.

The assessment indicates that the London Borough of Westminster, the borough in which the site is located, recorded between 539 bombs per 1,000 acres: a very high level of bombing. Based on the report findings, the threat assessment indicated a ‘likely’ risk from buried Second World War UXOs on site, and a further Stage 2 Detailed Risk Assessment is required prior to undertaking intrusive works into the ground.

4.9 Urban Ecology:

Disturbance to protected areas, species and areas of conservation will be minimised and the project will comply with all relevant statutory requirements. All appropriate licences or consents will be obtained prior to commencing works.

In the event of any unanticipated ecological or archaeological discoveries works will cease immediately and inform the Project Manager. Protect the finds with fencing and Project Manager to notify the archaeologist/ecologist for advice. Works will not continue until further instruction from the Project Manager has been obtained.

Regular monitoring will be undertaken during the development to ensure impacts on ecology are minimised and operatives involved with work activities with potential to have significant ecological impacts will be provided with work briefings and Toolbox talks.

To ensure that the risk of infestation by pests or vermin is minimised, adequate arrangements for disposing of food waste or other material attractive to pests will be implemented – enclosed skips and bins for any biodegradable waste only.

4.9.1 Tree Protection

An arboricultural report was completed by Tim Moya Associates (TMA) in April 2024 to outline the existing vegetation on site and how the works would impact them.

An Arboricultural Method Statement (doc ref number: 210510 - PD – 70) was completed in March 2025 by TMA which details the measures that will be taken to protect the trees on and close to the site during the demolition phase.

The detail of the retention and measures to protecting the tree to remain on the front elevation of the site is to be dealt with via planning pre-commencement conditions outside of this SEMP.

4.10 Archaeology:

An archaeological Desk Based Assessment was carried out by Museum of London Archaeology in March 2024.

The assessment found that although the site is within the Pimlico Tier 3 Archaeological Priority Area (APA), covering the confluence of the Thames, Westbourne and Tyburn rivers which has a high potential for the preservation of organic remains, geotechnical investigations within the site and study area show little or no potential for the survival of such remains.

The report recommends that no further archaeological assessment will be required.

4.11 Induction & Training:

The induction given to all site personnel shall include a general overview of site-specific environmental issues, as well as details of how these issues shall be managed.

This Site Environmental Management Plan (SEMP) will be available onsite, and a copy issued to subcontractors prior to commencement onsite. In addition to this plan being available, specific information will be communicated through the following means:

- Briefings by managers/supervisors and when necessary representatives from other departments.
- Bulletins and Alerts.
- Environmental toolbox talks.

An Environmental Notice Board will be displayed on site, which will contain the following information:

- Toureen Environmental Policy.
- Latest Environmental Alert.
- Site Environmental Response Plan.
- Site sensitive receptors.
- Identification of SHEQ REP on site.

Environmental toolbox talks relevant to site activities are to be conducted every month. The attendance and topic discussed are recorded and communicated back to management team.

5 Environmental Incident Response Plan:

The Environmental Emergency Response Controls are set out to:

- Establish the emergency response management procedure for the project.
- Outline the controls for any uncontrolled spillages or unforeseen emissions or events.
- Ensure all project activities comply with applicable statutory Legislation, the Code of Construction Practice and client requirements.

All environmental incidents will be investigated at the earliest opportunity in order to identify the basic causes. Subcontractors will report any environmental incidents immediately to our Project Manager

The Project Environmental Incident Response Plan in Figure 9 outlines the actions to be taken in the event of an incident.

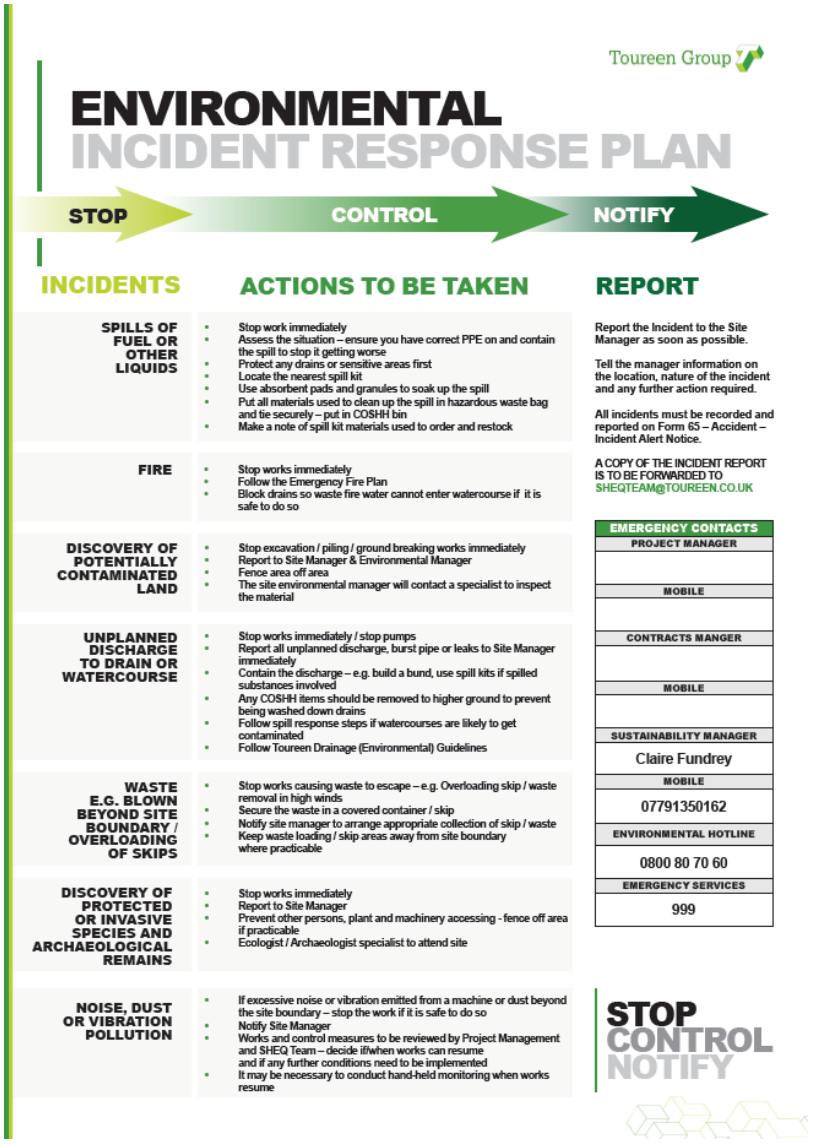


Figure 9 – Site Environmental Incident Response Plan.

5.1 Definitions of Environmental Incidents:

For the purpose of implementing the SEMP the following definitions apply.

5.1.1 Minor / Incident:

An event, including near misses that has negligible or minimal impact to the environment. For example: an uncontrolled and unexpected release of a substance with the potential to pollute air, land, and water resources but that can be contained and mitigated against using on-site equipment and personnel; disturbance to non-protected species / area.

5.1.2 Intermediate / Incident:

An accident where the effects of the event cannot be controlled without assistance from external bodies, e.g., discharge of large volume of silt, oil and fire water to river or large spillages of hazardous materials and is reportable to enforcing bodies (Environment Agency).

5.1.3 Major / Incident:

A major accident may attract the interest of local press or environmental regulators, i.e., Environment Agency, Local Authority, Natural heritage, etc. It could have an adverse effect on the company name or a major financial impact.

Contact details for key site and emergency response personnel with responsibilities relating to the protection of the environment will be kept and publicised in key locations on site.

Key contacts will include:

NOTE – Also refer to section 2.7 for internal / project contacts.

Contacts	Phone
External Contacts	
Local Police	101
Emergency Services	999
Environment Agency Incident Hotline	0370 850 6506
Thames Water	0800 316 9800
Emergency Electricity UKPN	0800 316 3105
National Gas Emergency Service	0800 111 999
Westminster Council - Switchboard	020 7641 6000

5.2 Control Measures and Reporting:

When an incident is able to be controlled by facilities on site, and no intervention is required from a third party or a statutory authority, controls should be implemented, the incident cleaned up and reported in the site diary. All incidents are recorded.

All environmental incidents, dangerous occurrences or near misses will be reported to the Environmental team on **Form 65 – Accident / Incident Alert Notice** and recorded on **Form EF 01 Environmental Incident Report**. Once an incident is reported and recorded, actions will be identified to avoid a recurrence, and the site procedures will be updated accordingly.

Where an environmental incident occurs that has been dealt with in a manner which follows best practice and poses no further threat to the environment, an entry is made in the environmental incident log to record the issue. The environmental Non-Conformance/Incident Log will also be used to identify any trends in environmental incidents.

Where an uncontrolled incident is classed as an emergency or a major incident, the Environmental / SHEP Manager will investigate the root causes, communication systems and issue a “lessons learnt” memo to the workforce concerned in addition to any NCRs that may have been raised.

All accidents / incidents, dangerous occurrences and near misses will be reviewed by the Environmental Manager and, where necessary, changes to working practices/procedures will be implemented.

5.3 Outline Pollution Control Measures:

5.3.1 Storage of Oils, Paints & COSHH:

Oil drums, paints and COSHH materials must be stored in bunded storage areas with the following requirements:

- 110% capacity to hold contents of single drum or 125% of multiple drums
- Securely located in an area to prevent vandalism and accidental impacts from vehicles and plant
- Situated away from drains and watercourses.
- Spill kits located in close proximity to material storage and clearly marked. All spillages must be contained and cleared as soon as possible.
- Bunded areas frequently maintained
- Secondary containers (e.g. oil cans) are to be labelled clearly and kept on appropriate bund or plant nappy when on site and locked away when not in use.

5.3.2 Fuel / Oil Refuelling:

Control of refuelling operations is important as the risk of spilling fuel is at its greatest during the refuelling of plant.

- Mobile plant should be refuelled in a designated area and preferably on an impermeable surface away from drains and watercourses where practicable.
- Delivery valves should never be jammed open, and no vehicles are to be left unattended during refuelling.
- Hoses and valves must checked regularly, turned off and locked away when not in use.
- Drip trays should be used to collect any minor spillages from equipment such as valves. The drip trays should be regularly checked, and oil disposed of.

During filling and delivery of fuel a supervisor shall be present to ensure the tank has sufficient capacity to hold the quantity, the correct fluid is used, spill kits are available, and any spillages or leaks are contained and cleared as soon as possible.

All bunds must be checked, maintained, and cleaned regularly taking appropriate measures as contents may be Hazardous Waste.

5.3.3 Plant and Machinery:

All plant machinery will be inspected daily and maintained in accordance with applicable procedure.

- Leakage or damage must be reported to the Site Manager in the first instance and actions to repair initiated
- All fixed plant (e.g. generators) will be appropriately bunded at all times
- Where possible, biodegradable hydraulic oil should be used for all plant
- Washing of plant should be carried out in designated areas only.

5.3.4 Silt:

Silt can be produced on sites from rainwater action on uncovered areas, pumping out and dewatering excavations, tunnelling operations and cleaning of drains or ditches.

Silt can cause pollution so management and mitigation measures will be put in place to prevent any impacts arising, as follows:

- Management of water entering and leaving site will be managed by the thorough planning of all earthworks operations.
- Minimisation/mitigation measures should be considered at all stages of work.
- Silty water is not permitted to be pumped into watercourses or surface water. Once cleaned of silt and contaminants, permission for discharge into a sewer must be obtained.

5.3.5 Bentonite, Cement, Concrete & Grout:

Liquid bentonite and cement are highly polluting, with the potential to cause harm to watercourses, drains and biota. To minimise risk:

- Containers must be kept closed and secure to prevent any entering the environment.
- Store materials at least 10 metres away from watercourses, gullies, and drains.
- Concrete washout to be carried out in designated areas only and wash water to be treated or otherwise disposed of correctly.
- Surface water drains should never be used for washing down bentonite, concrete or cement spills.

5.3.6 Site Drainage:

Obtain consent from local water company before discharging to storm or foul sewers. Monitor discharges in accordance with requirements of consent. Visually inspect discharge quality and take remedial action, as necessary.

Water settlement facilities to be provided where required – assess effectiveness of settlement facility and modify as required.

5.4 Site Pollution Plan:

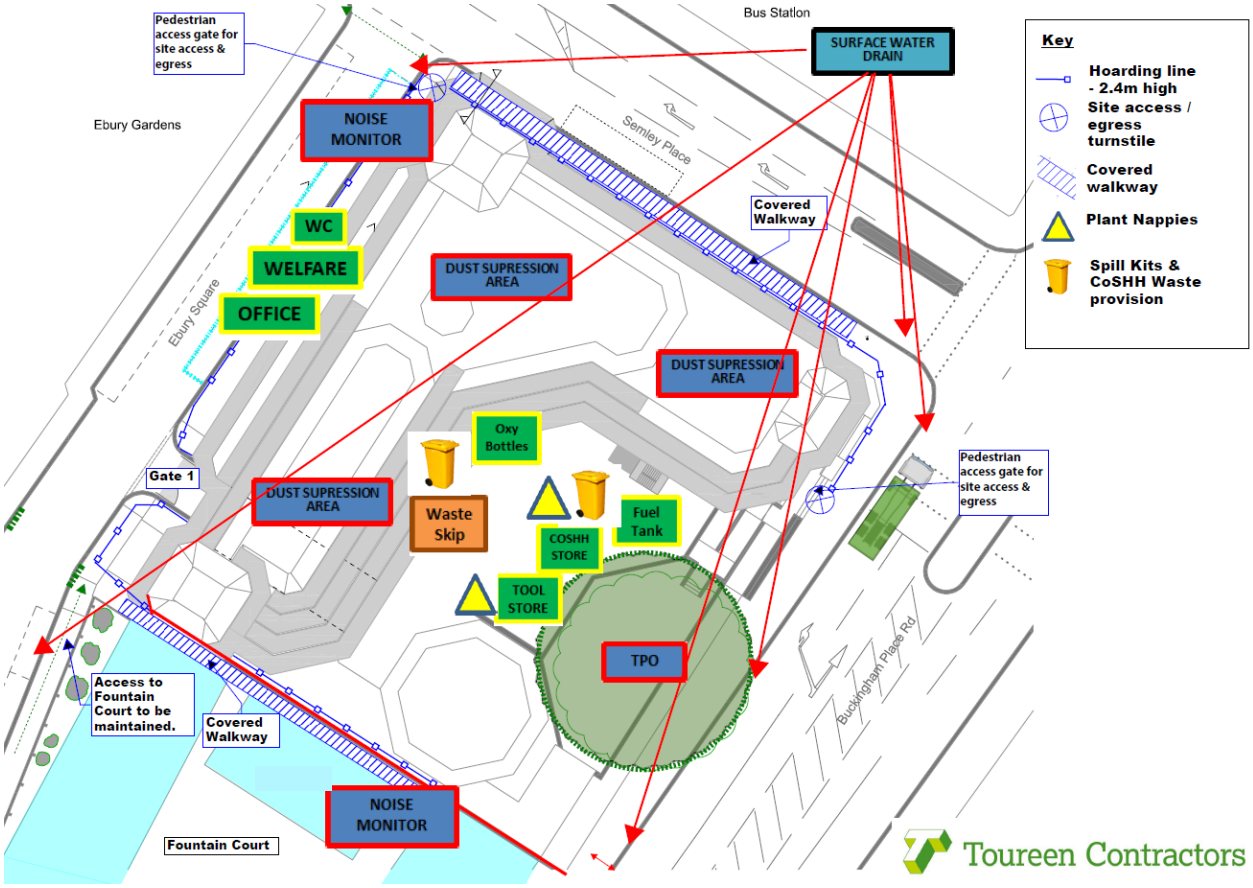


Figure 10 – Site Pollution Prevention Plan (Indicative)

6 Monitoring and Measuring:

6.1 Inspections and Audits:

The SHEP Team will carry out internal inspections and audits to establish compliance with all relevant environmental requirements. These may be supplemented by:

- Audits and inspections carried out by the client.
- Audits of sub-contractors.
- Third party or regulatory authority audits of ourselves or our subcontractors including those carried out for quality system certification purposes.

Audits will be carried out in accordance with EMS ISO 14001: 2015.

A copy of the SHEP Audit and Inspection Reports shall be issued to the Project Manager for action. The Project Manager shall be responsible for ensuring, by review, that such items have been addressed.

Any non-conformances or deviations from procedures identified during audits will be tracked and evaluated to identify any trends. These will allow to implement effective preventive measures as well as corrective measures.

6.2 Reporting:

The site will produce and communicate regular Monthly Environmental Reports which records the following Environmental Performance Indicators:

- Types and quantities of waste produced and recycled/re-used on/off site or removed from site.
- Hazardous waste.
- Material resource consumption (FSC certified timber, concrete, steel, aggregate etc).
- Diesel, electricity, LPG, and other fuel usage on site.
- Water usage on site.
- Carbon footprint arising from site operations, vehicle movements and other site activities.
- Non-conformities from audits.

Reports will be submitted in line with client and project requirements.

To ensure these records are robust and system based, the project will be utilising the use of online SMARTWaste reporting software to report on Environmental KPI's.

7 Site Environmental Management Plan (SEMP) briefing:

Names and signatures of Manager & Supervisors who will be in charge of the work: To be signed prior to any works being carried out. By signing this document, the Manager / Supervisor, is confirming that they have read, understood, and will abide by / follow the contents of this document. If changes occur partway through the work that present additional hazards, works are to cease, and the Project Manager is to be informed.

Print Name	Signature	Comments	Date

8 Appendices

8.1 Appendix A - Programme of Works