enVar
Regenerating our Earth

CEMP – Mat Pad Extension 2024

West London Composting Facility Upgrades 2024

IMS Ref – Construction Env Mgmt. Plan 2024

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Basis of the Report

This document has been prepared by Envar Composting Limited with reasonable skill, care, and diligence. Envar has taken great care using available information in the production of this assessment.

Information reported herein may be based on the interpretation of public domain data collected by Envar, and/or information supplied through historical, local, or internal knowledge and through Envar's colleagues and associates. These data have been accepted in good faith as being accurate and valid.

This document may contain information of a specialised and/or highly technical nature and third parties are advised to seek clarification on elements which may be unclear.

Contents

1 Introduction

1.1 Envar Composting Limited

Envar Composting originated in 1965 and has been at the forefront of the composting industry through the many decades since its creation.

The company has always been active in research and development, working with DEFRA and other partners to undertake research and being the first operator of an IVC waste process in the UK. Projects continue with Envars work within the Compostable Coalition, researching new ways of composting packaging and continuing research into natural fertilisers and peat replacement products.

Envar operates eight composting sites across the Southeast and Midlands areas. The main input materials being green waste which has been source segregated or co-mingled food and green waste at the IVC operations. The main customers for the business are local authorities.

Envar is owned and operated by the Heathcote Holdings group of companies, a British owned family business, operating in the environmental, waste, and agricultural sectors.

Envar has prepared a set of documents to justify, assess and control the proposed upgrades at the West London Composting Facility, located in Uxbridge, London under the Environmental Permitting (England and Wales) Regulations (as amended) 2016 and the town and country planning act 1990.

West London Composting Limited is a wholly owned daughter of Envar Composting Limited.

1.2 Scope of the plan

This CEMP (Construction Environmental Management Plan) shall form the backbone of the environmental management systems to be used whilst the site is in the construction phase. The operational phase environmental aspects are controlled through the operating management systems which are monitored and maintained by the environment agency as the responsible authority. This plan encompasses the following items as required by the planning permission reference 39755/APP/2023/652.

1. A construction programme including a 24-hour emergency contact number.
2. Complaints procedures, including complaint response procedures.
3. Air quality mitigation measures, including dust suppression.
4. Parking of vehicles of site operatives and visitors (including measures taken to ensure satisfactory
5. Access and movement for existing occupiers of neighbouring properties during construction).
6. Arrangements to demonstrate how any concurrent construction with HS2 works shall not impede the construction of the HS2 works.
7. Arrangements to minimise the potential for noise and vibration disturbance. This should include details on how any impacts on species and habitats would be avoided or mitigated.

8. Locations for loading/unloading and storage of plant and materials used in constructing the development.
9. Details showing the siting, design, and maintenance of security hoardings.
10. Wheel washing facilities and measures to control the emission of dust and dirt during construction.
11. Site lighting details.
12. Site drainage control measures. This should also include how chemical and or fuel run off during construction would be mitigated.
13. Tree protection measures in accordance with BS 5837:2012.
14. Details of ecological mitigation measures including an operational lighting scheme for bats.
15. Details of specific mitigation in relation to breeding or foraging black redstart.
16. Details of biodiversity and arboriculture mitigation measures including a pre commencement check by an ecological clerk of works (ECoW) to determine whether nesting birds are present.
17. A scheme for recycling/disposing of waste resulting from demolition and construction works in accordance with the waste hierarchy and circular economy principles.
18. An Unexploded Ordnance assessment to be undertaken.
19. Membership of the Considerate Constructors Scheme.
20. Details of waste disposal during construction and how any impacts on species and habitats would be avoided or mitigated.
21. Details of how any construction noise or vibration impacts on species and habitats would be avoided or mitigated.
22. Details of how any storage of construction materials or equipment would avoid mitigating impacts on species and habitats.

The plan shall also contain general measures which reflect the companies' working practices, general approach to environmental management and incorporate best practice outside of the above list.

2 Project Description

2.1 Site Location

The proposed development will be located at West London Composting's existing waste management facility, located on the northern side of New Years Green Lane, Uxbridge, UB9 6LX. The proposed development is approximately three hectares in size and is located towards the northern extent of the site, adjacent to the existing facility; the land ownership boundary is demarked in red in the figure below.

Figure 1 - Overview of site location.

There is a single access point into the northern site off New Years Green Lane to the south of the site (North of the road) into and out of which all traffic flows.

The site is located below the Ruislip/Bayhurst Woods SSSI which is approximately 100m North of the site.

The site sits in between the two permitted areas for the HS2 stockpiles of waste soil from the Ruislip tunnel although it has no interaction with these stockpiles. The permitted area extends into our unused land area there is no effected actual integration.

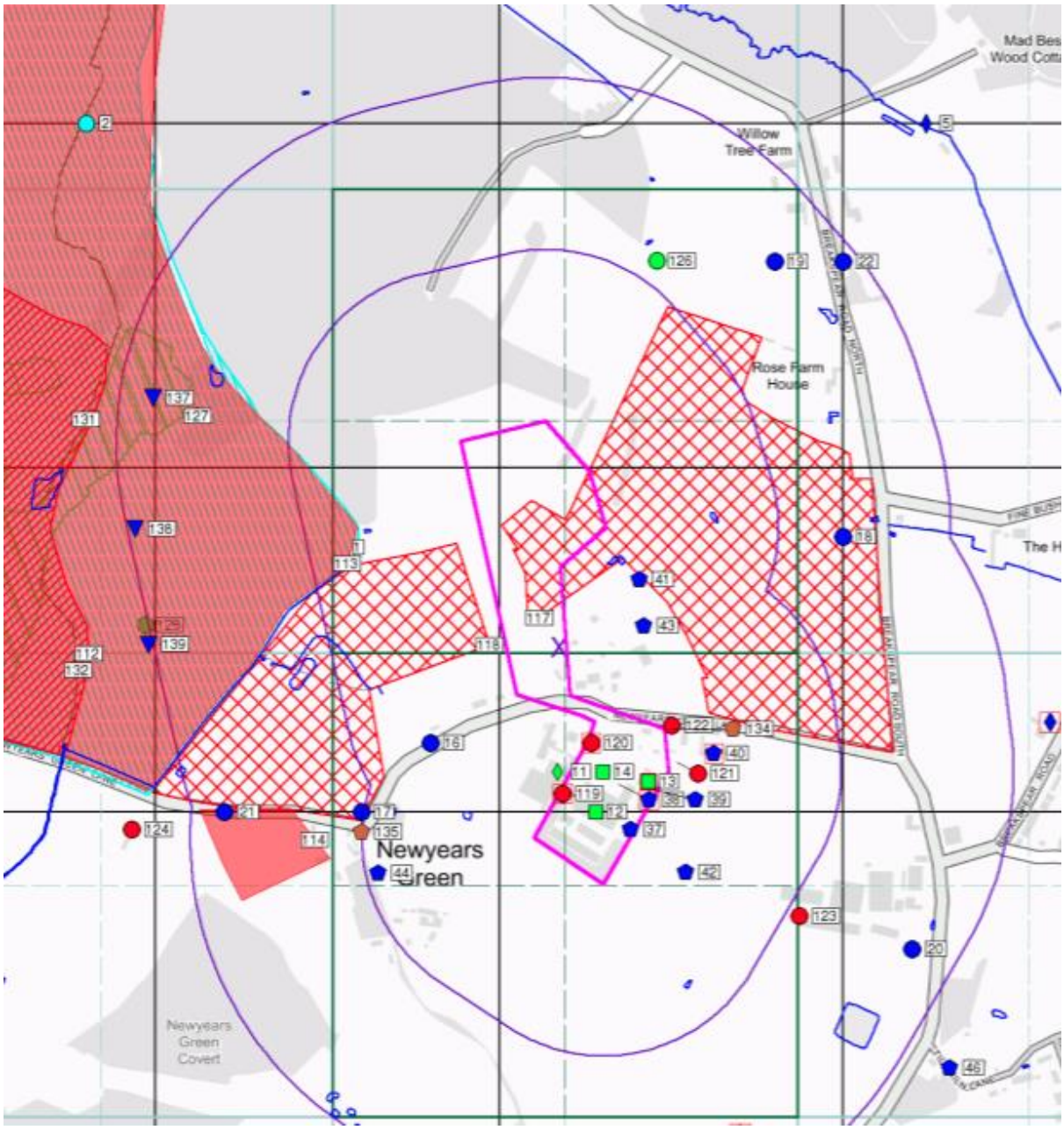

Figure 2 - HS2 permitted areas (temporary) in red hatch. historic landfill in red shade. Construction boundary in purple (not to scale, indicative only)

The site is located on top of a culverted waterway which drains underneath the existing site and then out to the western side of the area onto the HS2 operational area. A plan has been provided to mitigate any effect of the construction on surface water drains.

2.2 Development Details

The consented development is for the construction of a concrete pad extension and ancillary development of the existing facility. this includes the construction and forming of the land to ensure appropriate containment of all surface water and harvesting of the water, the laying out of appropriate supportive materials, protection of key infrastructure and concreting of the pad itself.

The site shall continue to operate as an open windrow composting facility, albeit in a better form than the site is currently. The site shall be more efficient in carbon terms and allow for more rapid composting.

Ancillary additions to enable the site to function includes:

- Construction of additional dirty water tanks and associated plumbing and groundworks for the capture and harvesting of rainwater
- Trench formation for the drainage system
- External site bunding
- Fencing works
- External drainage and flood prevention work
- Movement of offices and weighbridge

2.3 Schedule of work (Construction Programme)

The construction programme is anticipated to comprise the following key phases. The provisional time limit associated with each phase is provided in brackets, where an estimate can be made.

The complete construction is scheduled to be finished, inspected and ready to use by the 1st of April 2025. This is in time for the start of the busy composting season allowing for appropriate measures guidance to be adhered to as soon as possible.

Phase 1 – Late August – September 2024

Site investigations and preparation. Removal of any materials and preparation of the area. Investigations where required and reports as per ecological statements and assessments. During this phase trail pits shall be dug to assess the site for full design and the appropriate agreements of land hand back shall be made with HS2 and relevant utility companies.

Vegetation shall be cleared in agreement with HS2, and preparation of the land shall be made.

Phase 2 – September – November 2024

Civils and drainage. Lay the base level and underground runs and services. Construct the bunds and drainage for the external areas of the site construct the fencing of the site.

Phase 3 –November – December 2024

Prepare for laying of the concrete bays and structure for the tank supportive pad and trenching for the containment of water.

Phase 4 – December – April 2025

Install Tanks onto the concrete bund, fill the tanks and pressure assess them, connect the tanks into the external irrigation delivery pipework.

Phase 5 – January 2025

Install site offices and connect to utilities.

Phase 6 – March-April 2025

Commission site and start use.

Construction activities will take place 07:30-18:00 hours Mondays to Fridays and up until 1300 on Saturdays. No external construction will take place on Sundays or bank Holidays.

2.4 Sensitive Receptors

The facility is located approximately 1km West of the town of Ruislip and North of Uxbridge. The nearest sensitive receptors are detailed as per the below:

Receptor	Distance	Direction
New Years Green Residences	**20m**	**East & West**
Ruislip Woods	**260m**	**North**
Ruislip Population Centre	**700m**	**East**
M40	**2579m**	**South**

Table 1 - closest receptor table

The closest receptors are the houses directly near to the site. These houses shall be separated from the construction area by over 100m.

According to the Environment Agency's floodplain maps, the proposed development is situated outside of both Flood Zone 3 and Flood Zone 2; it is hence located in Zone 1 which represents the lowest probability of flooding. There is a part of the site which has been noted on the maps to suffer from pooling. However, this can be confirmed to be from mapping detail only and is not in fact the reality as the site drains via culvert.

The area around the site drains to the River Thames catchment. There is no discharge of surface water to the catchment area from the current or completed site. All rainwater is harvested for use on site.

3 Environmental Risk Assessment

3.1 Aspects Covered

This CEMP demonstrates West London Composting's commitment to avoiding or minimising the potential health, safety and environmental impacts that could results from the construction of this development. It will be adopted by all relevant contractors and sub-contractors who work on the site.
The CEMP will address the following issues related to the construction of the development:

- Air Quality
- Lighting
- Noise and vibration
- Ecology
- Waste management.
- Water management
- Security

3.2 Relevant Guidance and Legislation

The development of the proposed scheme during construction and operation is controlled by the conditions stated in the Planning Permission decision notice for the development. In addition, all works affecting the local environment are bound by the following (non-exhaustive) list of relevant Regulations:

- The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017
- The Flood and Water Management Act 2010
- The Environmental Permitting (England and Wales) Regulations 2016
- The Land Drainage Act 1991 (as amended in 1994)
- The Environment Act 1995
- The Control of Pollution (Oil Storage) (England) Regulations 2001

Where appropriate the SPR (Source Pathway Receptor) model will be used to consider impacts. This method is specific to issues which may cause nuisance or pollution to be experienced by a specified receptor. We will consider how the issue is created the effectiveness of how it may be conveyed to a receptor and how a receptor may be influenced by the issue to try and ascertain risk of nuisance caused. Other aspects will be assessed quantitatively.

For both SPR and ERA risk assessment we need to consider the pathway which a hazard would use to cause an issue. In this case the wind rose included below and hydrological map shows potential pathways to follow should there be a loss of control.

3.2.1 Meteorological Factors

The closest reliable wind rose is from Heathrow Airport meteorological station and gives data from 2018. Although this changes year on year it is a particularly good indication of the general weather overview for the area in any given year. The wind rose clearly shows the main wind direction is from the Southwest headed Northeast. This means the most effective pathway would take airborne contaminants and noise in the general direction shown in figure 4 most of the time and is away from the closest receptors which should be considered in risk assessments.

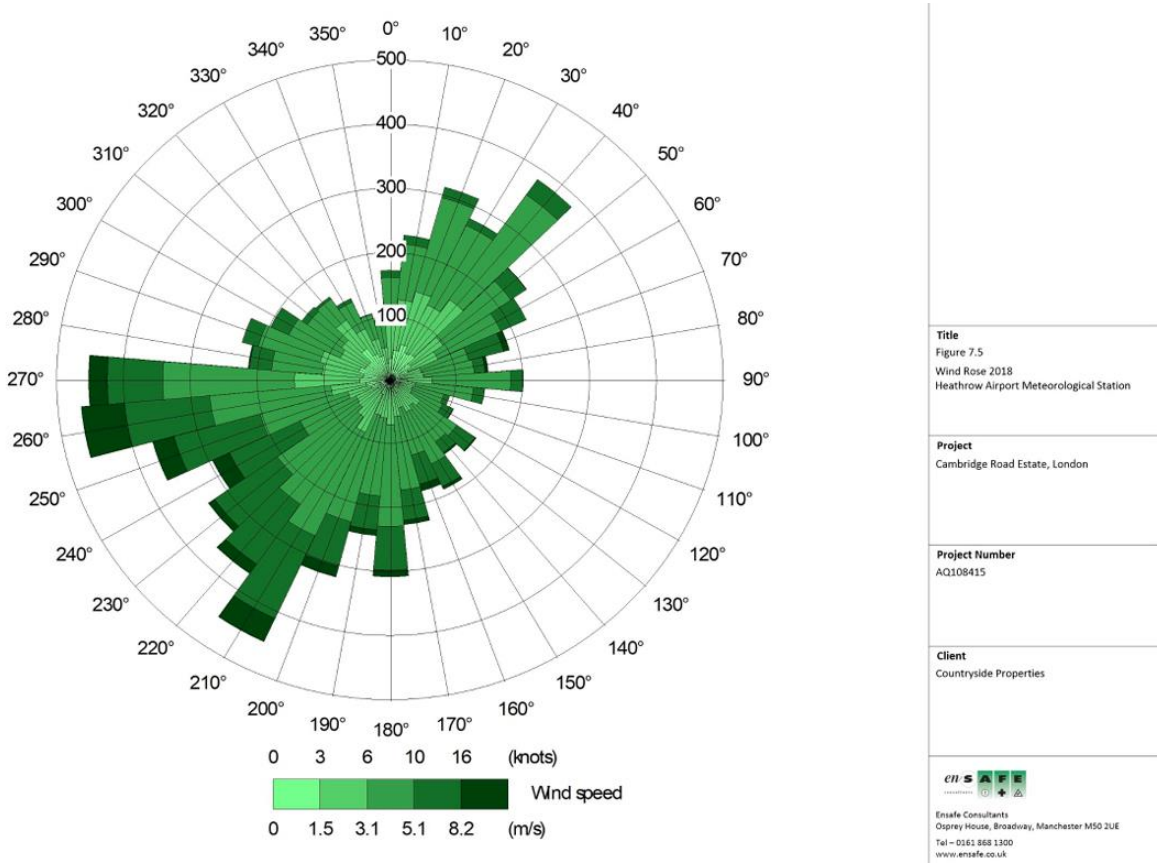

Figure 3 - Heathrow wind rose from 2018.

Figure 4 - general prevailing wind direction at the West London Composting site.

Taking these facts into account we can consider that the general wind direction and pathway of most airborne contaminants and some sound would be away from the closest receptors.

It is also of note that the extensive HS2 works which have been occurring in the area have not caused any significant disruption or given rise to complaints. The works have been much larger in scale than the imminent works at Highview farm.

3.2.2 Sources

3.2.2.1 Dust (Fugitive)

The focus will be to avoid dust generation, but where this is not possible, the site will implement effective techniques and mitigation methods to significantly reduce dust. Dust can be generated from moving machinery and vehicles, as well as general construction activity. Dust is not emitted from any single "source," and we therefore consider it to be a fugitive emission. It can be produced from movement of soil and stone, wheels and tracks demolition and cutting/grinding.

Source	Control
Vehicle Movement	Speed Limit 10mph, dampening of surface to limit kick up of dust.
Digging	Dampening, training, car, weather monitoring
Tipping Material	Tipping in designated areas, dampening down, sheeting of loads where appropriate.
Compaction	Dampening down, weather monitoring
Hand Tools	Dust control measures (hose connections). Training, minimising use.

Any vehicle transporting loose material will cover the material to reduce dust generation, in addition to adhering to strict speed limits to further reduce the chance of airborne dust particles. There will be designated areas for the onboarding and offboarding of loads that are likely to generate dust, and the prevailing wind direction in combination with sensitive receptors will also be considered when dealing with potentially dust-generating loads or activities.

Water spraying equipment, including a transportable bowser, to dampen areas or activities generating dust will help reduce the airborne dust particles. This technique is likely to be used more during the drier months. This dust mitigation technique could result in mud and debris covered roads and accessways which will require remedial action from a road sweeper.

Should dust be generated, steps will be taken to protect the health of the workers within the area. This includes, but is not limited to, ensuring dust masks are available to all workers, containing the dust at the source of the emission, and working to reduce the volume of dust generated.

3.2.2.2 Vehicle Emissions

The Construction Logistics Plan details the route for all construction traffic to use, as per the current Traffic Routing Plan. The aim of this is to ensure the least disruption to residents and limit vehicle emissions in built up areas.

To further reduce the impact of vehicle emissions, local contractors will be sourced where possible, and deliveries properly scheduled and coordinated to minimise the number of and time limit of deliveries each day.

All construction vehicles and contractor vehicles that access the site are required to comply with the relevant European regulations and MOT emissions standards, and when visiting site:

Will not leave engines idling when stationary.
Will ensure that vehicles are properly maintained and performing as required.

To further reduce the impact of emissions, the number of plant machines will be kept to a minimum during each phase of the works. An estimation of the number of vehicles and their daily usage is outlined below.

Groundworks Phase – Demolition, laying concrete/foundations.

- 2 Excavators (typical daily usage 80%).
- 2 Dumpers at (80%)
- Telehandler already on site

Concrete Phase – laying the concrete.

- Twenty-five no concrete deliveries (typical no per day).
- HGV movements (daily figure).
- One excavator (typical daily usage 50%).

Installation and commissioning of plant stage

- One no mobile crane (typical daily usage 80%).
- Two no HGV movements (daily figure).

A lot of the plant and equipment is available on site already. Where machinery shall be used which already exists on site removing the need for any of it to be transported into the site.

3.2.2.3 Lighting

Artificial lighting will be required on site for the construction phase to facilitate a safe working environment, safe vehicle movements, to aid safety for pedestrians and as an aid to site security. The site is committed to providing the minimum levels of artificial lighting, and where lighting must be used, consideration will be given to residents and other sensitive receptors that may experience nuisance from additional lighting. The site will ensure manual lighting is only used when required to illuminate a particular task or area and will ensure it is kept to the time required only. This will be turned off at night, unless required for security patrols or inspections.

The site will also use column mounted luminaires at a height of less than 4m to light the site access, internal site road, and the adopted footpaths and parking areas. Where these are located close to the site boundary, luminaires will be positioned so that the light is directed into the site, minimising the potential for obtrusive light to occur outside of the site boundary. Across the site lighting will be focused downwards towards the ground, or other horizontal plane, as far as possible to minimise the light spill and other light intrusion for residents and the surrounding area.

Blue-white light sources, metal halide and mercury lamps, in addition to any form of up-lighting, will be avoided to protect bat commuting and foraging habitat.

Lighting for the demolition and construction stage is most likely to be provided by mobile lighting towers. The luminaires would be focussed into the site to avoid the possibility of obtrusive light occurring. Construction lighting would be switched off outside of the construction working day, unless required for security purposes, at which point, the minimum illuminance level required for security lighting would be implemented in compliance with BS EN 12464-2:2007.

The construction phase will ensure that luminaires providing lighting adjacent to any water bodies on site will be fitted with shields to restrict light spill towards the ponds to below 0.2 lux on the water surface. This is in line with the recommendations on the values for darkness at sensitive receptors provided in ILP GN08/18.

Ensure that where luminaires are proposed to be installed close to the application site boundaries, the Applicant will ensure that luminaires are orientated away from the boundary to focus light into the proposed development to minimise the potential for obtrusive light to occur outside of the application site boundary. Emit a warm white colour temperature light (3000K or less unless otherwise specified by the lighting strategy) to reduce the potential for adverse effects on potential ecological receptors.

It is not expected there will be any lighting requirements outside of operational hours as are given in the planning document. This will provide protection for bats as per the guidance note from the ILP number GN08/23 and the Guidelines for consideration of bats in lighting projects (Eurobats) publication number 8 which states that avoidance of creating artificial light is a preferred option for protection of Bats they state:

“As a rule, ALAN should be strictly avoided, and artificial lighting should be installed only where and when necessary, i.e. when ALAN is needed for safety reasons or to comply with the legal framework.”

Following the hours of operation we can calculate the external operational hours in the hours of darkness as follows:

Average Sunrise and Sunset Times

- August: Sunrise ~06:00, Sunset ~20:00
- September: Sunrise ~06:30, Sunset ~19:00
- October: Sunrise ~07:00, Sunset ~18:00
- November: Sunrise ~07:30, Sunset ~17:00
- December: Sunrise ~08:00, Sunset ~16:00
- January: Sunrise ~08:00, Sunset ~17:00
- February: Sunrise ~07:30, Sunset ~17:30

Work Hours Overlap with Darkness

August: No darkness during work hours.
September: No darkness during work hours until the last week, where work might start in twilight.
October: Some darkness in the early morning.
November: Some darkness in the early morning.
December: Darkness from 07:30 to 08:00 and from 16:00 to 17:00.
January: Darkness from 07:30 to 08:00 and some twilight towards the end of the day.
February: Darkness from 07:30 to 08:00 initially, reducing as the month progresses.

Detailed Calculation

Working Days Per Month Calculations (Approximate):

October:
Approx. 30 mins of darkness in the morning.
Total dark hours = 22 days * 0.5 hours = 11 hours

November:
Approx. 1 hour of darkness in the morning.
Total dark hours = 22 days * 1 hour = 22 hours

December:
Approx. 1.5 hours of darkness (0.5 morning, 1 evening).
Total dark hours = 17 days * 1.5 hours = 25.5 hours

January:
Approx. 1 hour of darkness in the morning.
Total dark hours = 22 days * 1 hour = 22 hours

February:
Approx. 0.5 hour of darkness initially.
Total dark hours = 20 days * 0.5 hour = 10 hours

Summing Up: 11 + 22 + 25.5 +22 + 10 = 88.5 hours or 9% of the total operational time. this scenario should also be considered the absolute worst-case scenario as operations in dark or twilight shall be avoided for safety reasons unless necessary.

There are no buildings on site which shall be producing artificial light during the hours of darkness.

3.2.2.4 Noise and Vibration

The main source of noise pollution will be construction traffic and plant machinery. To minimise the impact of this, the hours of construction will be limited to 07:30 - 18:00 hours Monday – Saturday (1300 on Saturday). There will be no external construction work allowed on Sundays or Bank Holidays.
The site will also ensure, where possible, that deliveries avoid the traditionally busy peak rush hours of 08:00 - 09:00 and 17:00 – 18:00.

All contractors and sub-contractors will be required to adhere to the Code of Practice for Noise and Vibration Control on Construction and Open Sites, BS 52282, and will be encouraged to use muffling equipment and techniques where possible.
Construction traffic will not be allowed to park or queue on surrounding roads and will be managed appropriately to ensure this does not happen.

Activities such as breaking and crushing concrete and demolition activities will be undertaken in the swiftest manner possible and time limited, avoiding early hours of the mornings and late afternoons. There is no need to breakout or demolish any features.

Additionally, the following practical means to reduce noise and vibration will be implemented across the site:

- All materials will be managed with care and avoid dropping any materials.
- Where materials must be dropped, drop heights will be minimised as much as possible.
- Speed limits will be kept low and strictly adhered to
- Machinery and equipment will be switched off between uses or throttled to a minimum.
- As much as possible, ensure vehicles are fitted with appropriate noise control equipment.

There are no tools which are likely to be used which shall use significant noise or vibration off site. Which is any different to the normal site operations which already occur as the machinery and operation of it is much the same. There are no demolition works which are required for the project to continue or be started so no concrete breaking is required.

Where appropriate the scheme shall be registered under the considerate constructor's scheme.

3.2.2.5 Nesting Birds & Black Redstart

Any works involving building or vegetation clearance will avoid the bird breeding season of late February to August, inclusive. Where this is not possible, a suitably qualified ECoW will be employed to undertake a nesting bird survey during works. It is noted that the results of these surveys are valid for 48 hours only, therefore, multiple surveys may be required. Suitable deterrents will be put in place to avoid nesting birds using the site.

Black Redstart is protected under the Wildlife and Countryside Act 1981. London Wildlife Trust has produced an advice note for planners, councillors, regeneration agencies, landscape architects and

others, warning them of the presence of this bird in particular localities. It also provides advice on how to ensure that black redstarts may be conserved for the future.
The black redstart is a 'fully protected species;' it is listed on Schedule I of the Wildlife and Countryside Act 1981 (as amended). This protects the bird, its eggs, and nestlings from killing and injury, and damage or destruction to its nest. Importantly, the Act also protects against any intentional disturbance to the bird while it is building a nest, or is in, on or near a nest containing eggs or young, or disturbance of the dependent young of such a bird.

To ensure the development does not disturb the activities of the Black Redstart population a survey shall be undertaken prior to clearance of vegetation by an ECoW. Where Black Redstarts are identified Natural England shall be consulted immediately.

The general distribution of this bird is within the London boroughs during the summer months and before August. Although this is not always the case the bird tends to retreat to coastal Areas in winter months. Black Redstarts start breeding in mid-April. The nest is typically placed in a crevice or hole in rock or a wall or on a ledge of a building. The nest consists of a loose cup of grass and stems and is lined with hair, wool, and feathers. The eggs are laid daily. The clutch consists of 4 to 6 eggs that are usually white but can also be pale blue. Beginning after the final egg is laid, the eggs are incubated by the female for 13–17 days. The young are cared for, fed by both parents, and fledge after 12–19 days.

Because construction and clearance are most likely to be undertaken in August this provides some mitigation. Any walls, rocks or crevices in trees shall be inspected by the ECoW Before removal, should any activity be suspected, the clearance shall be stopped, and Natural England consulted.

3.2.2.6 Waste

The site is committed to reducing the volume of waste generated and will manage waste to maximise the re-use of materials on site. Where it is not possible to reuse materials, the waste hierarchy will be implemented, and suitable recycling bins and skips provided.

All contractors and sub-contractors will be encouraged to reduce packaging, or to use reusable packaging instead. They will also be required to properly segregate waste so that it can be recycled or disposed of properly.

The development will create any surplus soil. Offcuts of steel and steel and metal scrap shall be taken to BFA recycling which is within ½ a mile of the development. Other wastes shall be taken to another local waste operator in appropriate containers. LJG is less than ½ mile from the site which supports local businesses and minimises travel.

All hazardous wastes will be stored appropriately and separated from non-hazardous wastes. Waste transfer notes will be kept for the relevant period and only recycling sites and hauliers licenced by the Environment Agency will be used. Any vehicles carrying waste will ensure all waste is properly covered and contained.

General housekeeping of the site will be maintained to ensure no litter or general waste builds up. West London Composting Ltd will provide disposal directly or on a subcontracted basis and will manage all compliance matters.

3.2.2.7 Water management

The site sits on clayey soil, causing impeded drainage. This means there is the potential for excavated areas to quickly fill with water. Contractors and sub-contractors will be made aware of this, pumping equipment will be available, and excavation will be avoided during very wet periods. Water drains towards the existing site where is its collected and stored in tanks for the use in the composting process. The site has not got any off-site discharges.

Using the road sweeper to remove debris and mud will help reduce the volume of debris that ends up in the surrounding gullies and drains. This will help keep the drainage system clear and performing well.

Given the rural surroundings of the site, mains sewers are not present and therefore do not present a flood risk for the site. However, prior to any excavation a desk-based assessment of any buried services will be conducted. Flooding from external areas into the site shall be mitigated through the construction of French drains on the external areas of the site as has been detailed in the planning application.

The site naturally drains to the centre of the existing construction where all water is stored for re-use. WLC discharges no water, clean or dirty off the site and it is all used in the process. Therefore, there is no SuDS drainage, no soakaways, reedbeds, no off-site pipes or ditches, ALL water landing on site is recovered.

Felling shall take place on the current bunded impermeable area significantly reducing thee risks of spillage. Should there be a spill it is automatically contained in the current system.

Notwithstanding this there shall be appropriate oil and fuel spill kit on site. The spill kits are already in existence on site and any contractors shall be inducted on their location and use. 110l spill kit bins with appropriate clip to barrel disposal routes shall be available.

Any maintenance shall also be undertaken on the current bunded, impermeable surface to minimise any risk or spillage of any substance into the environment.

Envar has spill procedures which can be found in appendix number two.

3.2.2.8 Security

A Site Manager will be appointed to ensure the Health and Safety (H&S) of the site. Their duties will include, but not be limited to, updating the H&S board daily, ensuring all visitors sign in and adhere to the sites H&S practises, ensuring appropriate PPE is provided and used. They will also be responsible for ensuring the overall tidiness and housekeeping of the site.

HERAS security fencing will be double clipped around the perimeter of the site and the site will be accessed via one entrance and exit which will be locked outside of the hours of operation. As well as deterring intruders to the site, the fencing will aide in keeping wildlife out of the site.

The existing CCTV shall remain on which does not use security lights and is a night vision system, which will be maintained throughout the construction phase, to further deter intruders and ensure that any intruders are quickly dealt with and removed from the site.

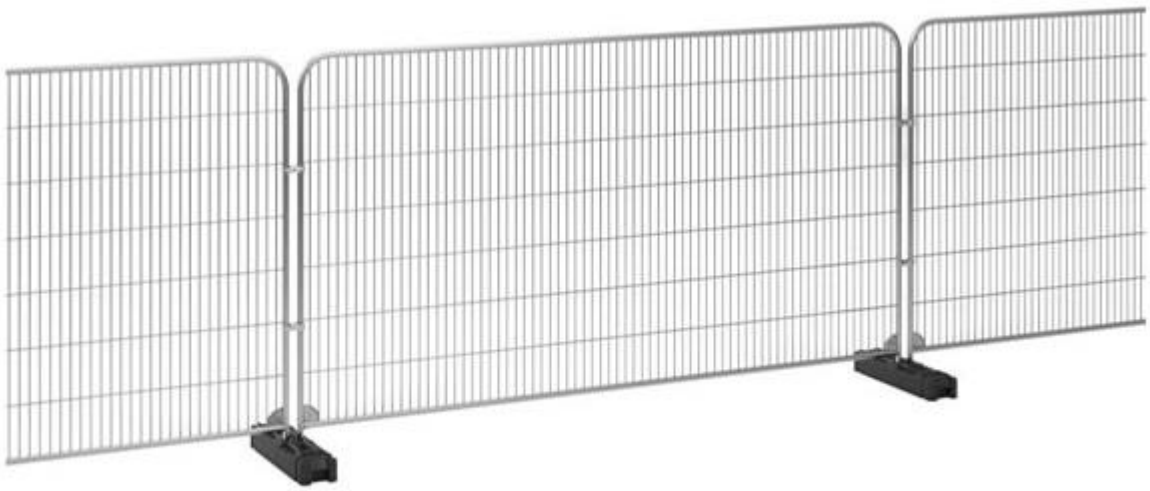

Figure 5 - Heras fencing/Hoarding.

The site already has a 24-h emergency number which works on a “call hunt”. Whereby the number calls a fixed list of Envar contacts until someone answers in a priority order all the way up to the directors. Security hoardings are not required as the security fence is in non-accessible land. The construction area can only be accessed via HS2 secure area or though the entire length of the West London Composting Maturation Yard which already has its own gates and hedgerow.

Notwithstanding this double clipped Heras fence shall be provided around the construction area to provide further security with sold block feet and steel clips.

The security fence shall be inspected as part of the daily site checks and recorded on the weekly site check log.

3.2.2.9 Incident response

All incidences will be reported to the Site Manager. The Site Manager will be responsible for recording the incident and taking appropriate action. Incidences will include, but not be limited to:

- Hazardous material spillage
- Health and Safety concern
- Damage to habitat or protected species.
- Waste issues.
- Complaints
- Information requests

All incidents will be recorded on the principal contractor’s system and passed through the client for recording on their electronic compliance management software. Each incident will be dealt with as per incident procedure. This includes complaints which are dealt with as per the Envar’s (WLC Parent) complaints procedure which is appended as “Appendix 1”.

3.2.2.10 Parking

Parking for operators, construction workers and visitors shall be provided on the southern side of New Years Green Lane on the existing waste site where there is ample parking to accommodate the needs of the build. It is estimated that there will be ten people required at any one time plus two visiting managers and supervisors. These persons can safely park on the WLC southern site and make their way across the road on foot to the construction area.

Having on site parking means that access for other local occupiers and operations shall not be impeded in any way. There shall be no queuing or stopping allowed along the public highway.

3.2.2.11 Arrangements with HS2 and HS2 appointed contractors.

HS2 and WLC are working together on the development as the areas of control cross over and the land HS2 occupies is in the ownership of the Heathcote Group. A weekly catch up and planning session shall take place between HS2 contractor and WLC. The contractor for HS2 (SCS Rail) has been working closely with WLC to enable the works to proceed in a timely manner and this co-operation is to continue.

A combined programme of works is being developed by the involved parties which includes HS2 representatives, persons from SCS and Heathcote representatives. As this plan evolves and is implemented it shall be changed to best meet all party's needs.

3.2.2.12 Loading and unloading of vehicles – wheel wash

Plant and equipment needed for the development shall be unloaded and reloaded on the current working land area namely the "maturation pad." This means that there will be no waiting, loading, or unloading done on the public highway. Please see the attached CLP (Construction Logistics Plan) for further details.

The entrance/exit of the site is designed for such traffic and is currently used as such. And is detailed in figure 6. The site shall be built from the centre area out and materials will be stored on completed bays as the site is constructed. Further reinforcing there being no requirement to load, unload or wait on the roadside.

As an already operational compost site the operator has provision for the minimisation of risk of debris and dust on the highway. Wheels shall be inspected on leaving the site and if required a pressure wash is available to remove debris before entrance to the highway. Should any dirt be dragged out to the public highway the appropriate machine to clean the highway shall be deployed straight away.

Figure 6 - machinery parking and material storage area.

3.2.2.13 Tree Protection

There are no trees to be retained within the construction area or within 10m of the construction area. All new planting shall replace any lost trees as per the BMD document 21.0069.DRE.903. therefore, no tree protection plan is required.

3.2.2.14 UXO – Unexploded Ordnance Risk Assessment

A preliminary UXO shall be completed before any major works. Risk Assessments are provided by 6 Alpha, who are renowned experts in the field of UXO and are independent consultants. The reports conform to current best practice developed and recommended by CIRIA and endorsed by the HSE. As the site has been previously disturbed at all areas the risk of UXO is low.

Any areas where intrusive work is required which have not been previously disturbed a watching brief shall be provided.

The initial desk study shows the risk of bomb threat is low.

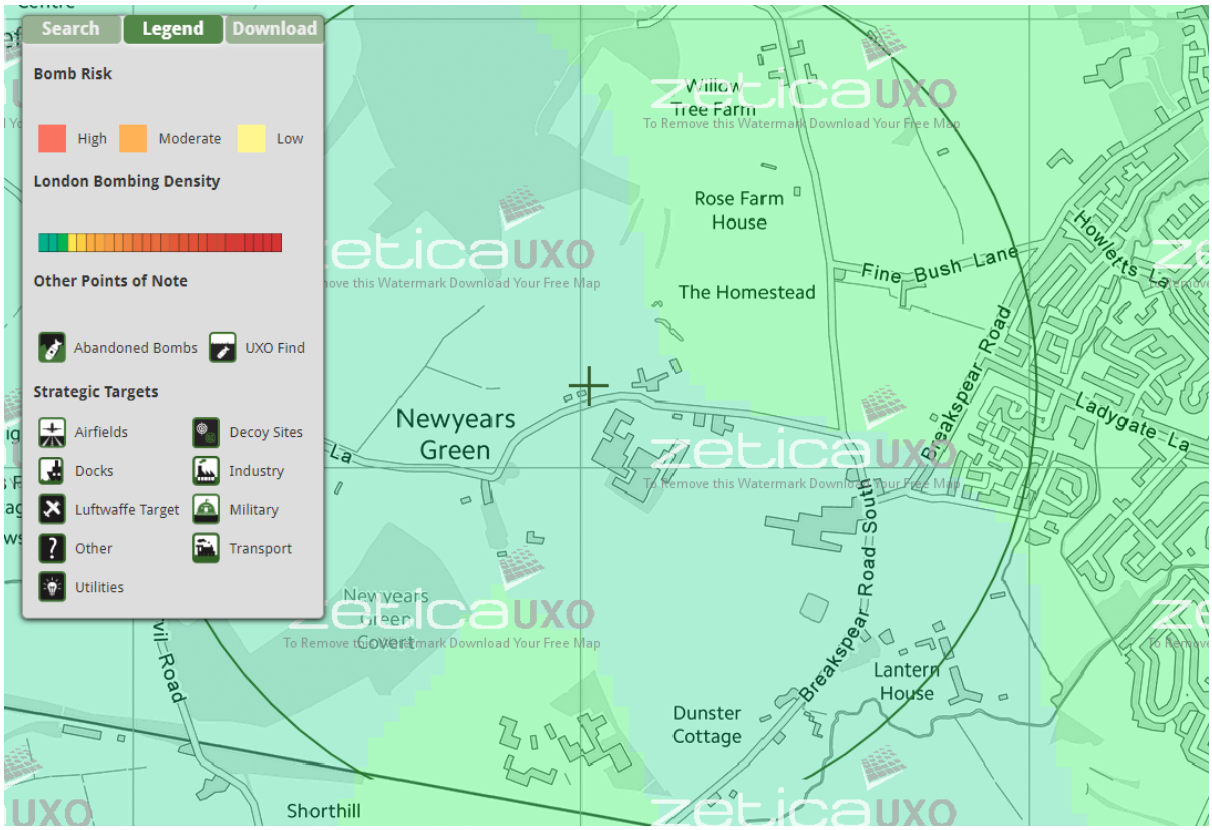

Figure 7 - desktop bomb risk snapshot.

3.3 Environmental Source Pathway Receptor Risk Assessment

Factor/Aspect	Source Magnitude	Pathway Effectiveness	Receptor Sensitivity	Suitable Controls	Probability of Exposure	Consequences	Overall Risk
Air Quality (Dust)	Very Low	Low	High	Aeration Monitoring	Very Low	Unlikely to be detectable at receptor, no consequences.	Very Low Risk
Air Quality (Odour)	Low	Low	High	Aeration Monitoring Dilution	Low	In the unlikely event of detection would be transient and for a small time	Low Risk
Lighting (Artificial)	Very Low	Medium	Medium	Minimal lighting to be used in hours of darkness, using low level lighting.	Low	Temporary in nature and only for an extremely limited time. consequences not expected to be significant on habitats or species or human receptors.	Low
Noise	Medium	High	Low	As per the controls in the document	Medium/Low	Transient disturbance	Low

3.4 Quantitative Environmental Risk Assessment

Activity	Hazard	Impact	Mitigation
Demolition & Construction	Dust, Noise, Damage to species or surrounding habitats	Damage to surrounding area including SSSI habitats and waterways.	Access and operational risk assessments and controls, development plans, this CEMP, spill kits training and procedures, appropriate containment, and design.
Machinery Movements	H&S, Dust, Noise, Damage to species or surrounding habitats	Damage to surrounding area including SSSI habitats and waterways.	Access and operational risk assessments and controls, development plans, this CEMP, spill kits training and procedures, appropriate containment, and design
Operation of Tools	Noise, Dust	Dust contamination and noise disturbance.	Access and operational risk assessments and controls, development plans, this CEMP
Waste Creation	Loss of control and contamination of surrounding areas and habitats	Litter in the surrounds or in watercourses.	Access and operational risk assessments and controls, development plans, this CEMP
Security	Arson, damage to surrounding area	Damage to surrounding area including SSSI habitats and waterways.	Enclosure with security fencing, locks and keys procedure, CCTV

4 Appendices

4.1 Appendix 1 – Complaints Procedure

INTRODUCTION

ENVAR COMPOSTING is committed to responding promptly to all queries and complaints and to fully record all details through to resolution. Complaints can be distinguished from queries as follows:

A complaint is defined as a written expression of dissatisfaction in relation to the delivery of services to clients or relating to actions by ENVAR COMPOSTING. Verbal complainants should be asked to put the matter in writing for it to be passed forward to senior management and investigated, this is to make sure the complaint is not mis-heard or mis-interpreted.

Enquiries will usually be questions raised by clients concerning aspects of delivery or by others relating to actions by ENVAR COMPOSTING but with no obvious indication of dissatisfaction.

On receipt of a complaint staff shall:

- Identify the full details of the complaint and (when appropriate) the client contract referred to
- Report full details of the complaint immediately to your line manager as per the company Organizational Chart In case of a complaint being directly received by a director or chairman, they will then deal with it themselves or assign a fellow director to deal with it.
- Senior Managers receiving a complaint must always promptly report details to the Managing Director.
- Management will ensure that Envar Composting's Insurers are notified, at the earliest opportunity, of all potentially litigious written complaints.

PROCEDURE

1. Complaints – Key actions

Receive complaints politely and unemotionally. Never admit liability, until a full investigation has been completed.

The person receiving a verbal complaint should log the below information but stress to the complainant they need to issue the complaint in writing themselves for it to be taken any further:

- Complainant's name, address, contact telephone number, email address (if appropriate or offered).
- Date complaint received.
- Contract concerned.
- Nature of complaint.
- Any solution suggested by the client.
- Any timeframe indicated by the client.
- Ask the complainant to put it in writing
- Immediately alert your line manager

Staff should not try to resolve complaints themselves as this carries the risk of exacerbating the situation.

Senior management within the business will decide on:

- Initial assessment of the complaint in terms of criteria such as validity, severity, complexity and impact.
- The action to be taken.
- Who should investigate the circumstances surrounding the complaint.
- How the case should be investigated.
- Who should report back to the complainant.

Complaints MUST be formally acknowledged within 2 working days of receipt, advising the complainant that the matter will be promptly investigated.

Where it is judged by the Relevant Manager that the complaint could lead to a financial claim against Envar Composting, the Manager will immediately contact the MD who will in turn take the appropriate steps.

Complaints must be thoroughly investigated (see Section 3) and resolved. A draft response to the complainant should be prepared and agreed at the appropriate Management level (as above). The draft response must then be checked by compliance who in turn may seek advice from our insurers and/or our solicitors.

2. Corrective action

Once the investigation is completed, Senior Management should decide what corrective action (if any) needs to be taken and implement as necessary. The timescale and responsibilities for corrective action must be defined.

Senior management within the business unit should subsequently verify satisfactory completion of the required action, placing evidence on the complaints record of having done so.

3. Preventive action

Actions required to prevent recurrence of the circumstances surrounding a complaint should be identified, recorded, and implemented by Senior Management. Matters having wider implications should be reported via Operations Meetings and Management Review. See non-conforming and corrective actions procedure

4. Response to complainant

Once the investigation is completed, a formal written response to the complainant will be drafted and cleared (as detailed above) before sending. This communication should:

- Explain what action has been taken to investigate the complaint.
- Make clear whether Envar Composting believes the complaint is justified.
- Where it is clear Envar Composting is not at fault, the reasons should be clearly explained.
- Confirm what action has been or is proposed to be taken to resolve the complaint and prevent future recurrence.

The response to the complainant and any reply should be put with the complaints record.

In cases where the complainant refuses to accept the proposed action to resolve the complaint, written notification of the continued dissatisfaction must be requested, and the case referred to the relevant Business Director.

5. Records

To facilitate traceability and retrieval it is recommended that an electronic complaints file is maintained to at least include the following records:

- Copy of the formal written complaint.
- Senior management decisions on key actions.
- Details of any associated reviews or investigations.
- Copy of the authorised response to the complainant.
- Details or corrective and preventive actions taken.
- Copies of all correspondence considered important relative to the complaint.
- Logged on the Master Monitor.

6. Review

Performance against complaint key performance indicators will be periodically reviewed at Management Review Meetings.

Complaints which are considered by Management to be major, will also be reviewed at Board Meetings.

The effectiveness of any preventive actions should be periodically reviewed.

Trends in complaints will be reviewed at Management Review meetings. Further action will be recommended where there is evidence of common causes.

4.2 Spillage Response Plan

1 Site Spillage Action and Incident Response Plan

In the event of a spill, the following actions should be taken. The order of actions may depend on the existing conditions.

1.1 Notification and Initial Spill Response:

- Notify General / Operations Manager
- Check cause and stop source of spill, when possible, without undue risk of personal injury.
- If nature of spill material is unknown, evacuate area immediately.
- Restrict all sources of ignition when flammable substances are involved without undue risk of personal injury.
- Make spill scene **OFF LIMITS** to unauthorised personnel.
- If the spill is substantial and is a threat to the environment, inform the Environment Agency.

1.2 Response Information:

When notifying the relevant authorities, the following information should be provided if known or can be determined:

- Name of individual reporting spill.
- Location of spill.
- Number of injured personnel and nature of injuries.
- Substance spilled or released.
- Amount spilled (estimated).
- Time spill occurred (estimated).
- Extent to which the spill has travelled.
- Any other pertinent information (i.e. other potential hazards)

1.3 Emergency Response /Procedures:

- Warning signs are posted if spill is suspected to be hazardous.
- Supervisory personnel perform routine inspections till clear up has begun.

1.4 Containment, Clean up, and Disposal:

- Compost, sandbags, or other absorbent materials may be utilized to contain spilled.
- Substances around leaking containers.
- Substances should be transferred from leaking drums as soon as possible.
- Clean up operations should include the use of absorbent materials.

All contaminated materials will be place in an approved container and disposed of in accordance with the Waste Management Regulations for the substance being dealt with.

1. If the spillage area is small enough to tackle yourself then fetch the nearest spill kit (see map of site spill kit locations).
2. Put on the correct PPE, disposable non- porous gloves and, if needed, goggles and apron.
3. Place the absorbent socks around the spillage to prevent it from spreading further.
4. Place the absorbent pads on top of the spillage.
5. Allow time for the spill to absorb into the pads.
6. Clean up the absorbent pads and socks using a hand shovel and place them into the plastic bin liner which is in the spill kit.
7. Wipe the area down with additional absorbent pads until clean and use disinfectant to clean the area, if necessary, place all waste into bin liner.
8. Remove PPE and place into bin liner.
9. Cable-tie the top of the bin liner and place into correct disposal bin for waste oil.

Report that the spill kit will need replenishing to your Line Manager.

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Dealing with a site spillage

Step 1

Take the spill Kit to the spill area

Step 2

Put on the correct PPE for the spilled material

Step 3

Try & Stop the flow of the Spill – eg stand up the receptacle or tun off any taps

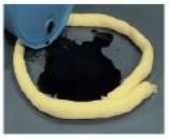
Step 4

Protect any nearby drains, by placing the drain cover over the drain

Step 5

Place socks around the edge of the spill to contain & absorb the Spill.

Do not remove socks until spill is fully absorbed.



Step 6

Use the pads to absorb the spill

Step 7

Place all used items in the hazardous waste bag and seal with the zip tie

Step 8

Inform your line manager of the Spillage. Dispose of the waste in the correct waste bin & replenish the used Spill kit

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