REGENTS HSE. CONSTRUCTION ENVIRNOMENTAL MANAGEMENT PLAN



Section 0: Regents House Project Index



Accountability for this Document

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Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		1 of 3

Section 0: Regents House Project Index



Record of Review

Reviews, revisions and amendments to this document are to be recorded here:

No.	Date	Section	Page	Details	Authorised	Revision
1.						
2.						
3.						
4.						
5.						
6.						
7.						
8.						
9.						
10.						
11.						
12.						
13.						
14.						
15.						
16.						
17.						
18.						
19.						
20.						

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	H		2 of 3

Section 0: Regents House Project Index



All projects are undertaken in accordance with the Hill Group Procedures. Our commitment is set out in Hill Policies for Health & Safety, Environment and Quality. These policies are endorsed by the CEO and communicated to all employees.

Hill hold certifications with LRQA for the following standards;

- ISO 9001 for Quality Management Systems
- ISO 14001 for Environmental Management Systems
- ISO 45001 for Occupational Health & Safety Management Systems
- ISO 50001 for Energy Management Systems
- Safety Schemes in Procurement (SSIP) PAS91

To ensure each project is assessed on its own merits and appropriate controls are implemented, the Project Delivery Plan forms the core document for delivering a project.

It sets out the project scope, objectives and relative priorities in a structured format. The Project Delivery Plan (PDP) will be initiated at the pre-construction phase of a project and will be progressively developed.

The PDP shall be reviewed on a minimum **monthly** basis to incorporate all project changes and ensure all statutory, legislative and contractual requirements are updated.

A hard copy of **Section 3** must be available on site.

Section 1: Project Details

Section 2: Construction Phase Plan

Section 3: Fire Safety Plan

Section 4: Emergency, Accident & Incident Arrangements

Section 5: Environmental Management Plan

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		3 of 3



1.1 Project Details

New build construction of 126 residential units over 3 Blocks for Clarion Housing Group. These units will be available for affordable rent.

Site Address

Regents House, Station Approach, Dorking RH4 1TH



1.1.1 Project Brief and Scope

We initially need to carry out some site investigation works, demolition of the existing buildings, erection of site boundary hoarding and installation of a piling mat. Following approval of our Gateway 2 submission we will begin piling works for the 3 Blocks of apartments. The substructure supports an RC frame which in turn receives SFS and masonry supported brickwork. The structure has both bolt on and inset balconies and flat roofs. The main plant is air source heat pumps supplemented with electrics which will be sited on the main roofs. Internal fit out will be detailed as British Gypsum products. Each building will be serviced with a lift. Blocks as follows:

- Block A is 24 units arranged across 6 St.
- Block B is 86 units arranged across 7 St.
- Block C is 16 units arranged across 3 St.



Construction Site traffic will be directed to site as per plan below.



Construction Traffic Routes

1.1.2 Client

Clarion Housing Group, 5th Floor, Greater London House, Hampstead Road, London, NW1 7QX

1.1.3 Site Address

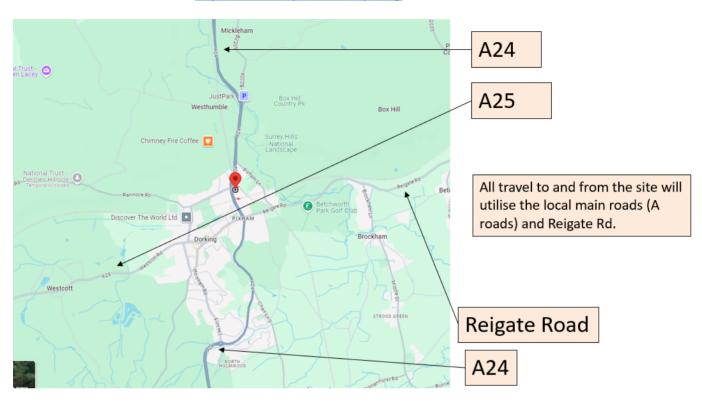
Regents House, Station Approach, Dorking RH4 1TH

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		1 of 19



1.1.4 Location

What3words:- https://w3w.co/pool.times.pushy





Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		2 of 19





1.1.5 Site Conditions

Ground Conditions

UXO

 A desk top study and stage 1 risk assessment is due to be carried out shortly to provide a thorough understanding of any potential UXO hazards associated with this site. If any significant hazards are identified we will provide risk mitigation options to address the hazard.

Contamination

- Ground investigation works have been undertaken. The fieldworks consisted of six rotary cored boreholes to a maximum depth of up to 18.50m bgl and four dynamic sample boreholes to a maximum depth of 5.00m bgl. Gas and groundwater monitoring standpipes were installed in selected boreholes. Selected soil and groundwater samples were subjected for laboratory analyses. A total of six ground gas and groundwater monitoring visits have been undertaken.
- Human Health The risk to future site users is considered Low to Moderate with respect to the proposed end use (Residential without Homegrown Produce), within areas of proposed soft landscaping located in current car park off Lincoln Road.
- Controlled Waters The risk presented to controlled waters is assessed to be Low.
- o **Ground Gas** the risk presented by ground gases is assessed as Low with no requirement for ground gas protection measures as part of the proposed new build development.

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		3 of 19



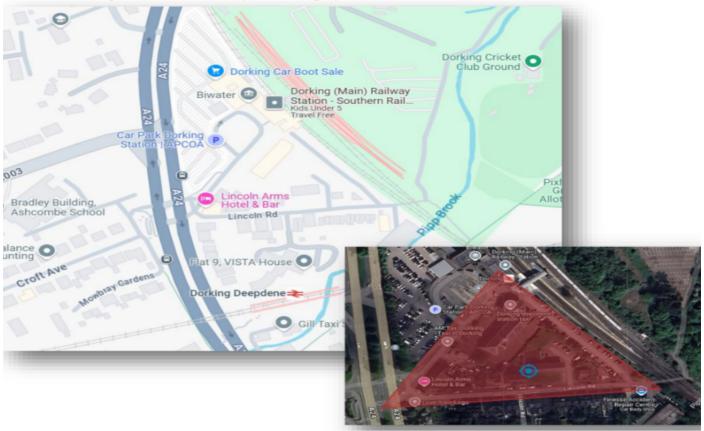
- Overall, the site has been assessed as Low to Moderate level of risk to future site users and migration of ground gases whilst a Moderate Risk to controlled waters associated with the proposed development.
- Existing Services (Above & Below Ground)
 - Extensive utility desktop searches were carried out for all services as below and per location highlighted in red below.

Utility Type	Utility Provider	Affected	Not Affected	No Response Received
Gas	SGN Bring Energy GTC		\ \ \	
Water & Sewer	SES Water Thames Water	>		
Electric	UKPN	•		
Telecoms	EuNetworks EXA BT CityFibre Colt Lumen MBNL Sky Sota Utility Assets Verizon Virgin Vodafone			

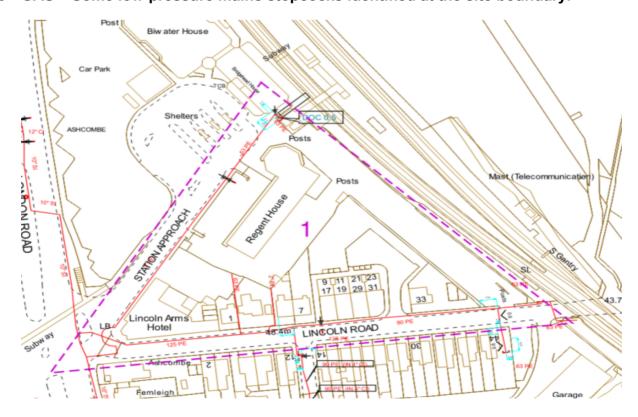
Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		4 of 19



Utility Search location (red Triangle)

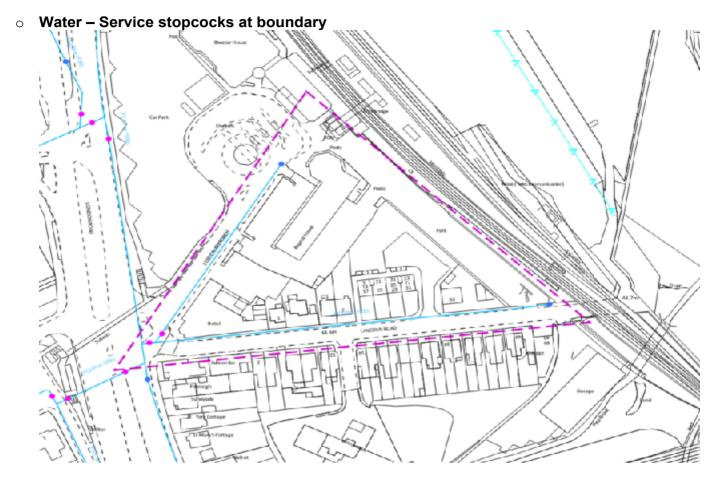


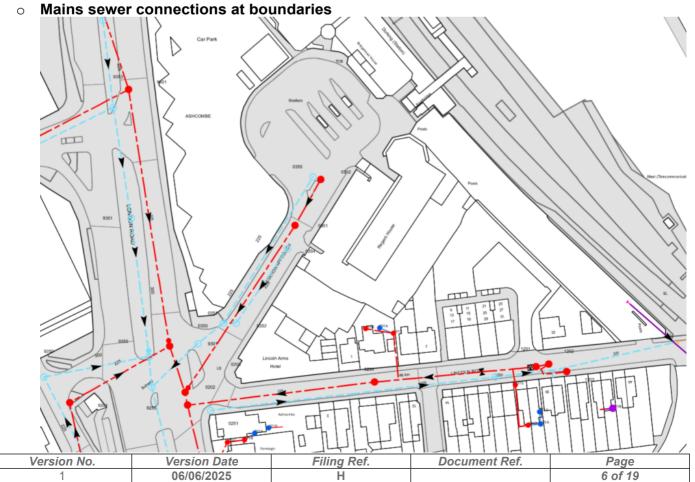
o GAS - Some low-pressure mains stopcocks identified at the site boundary.



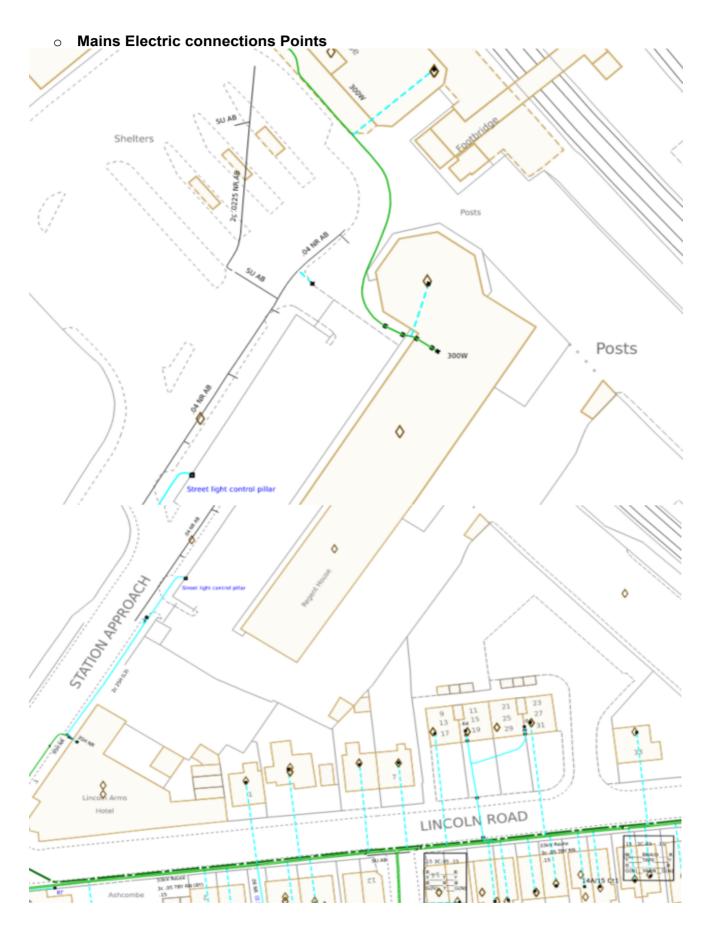
Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		5 of 19









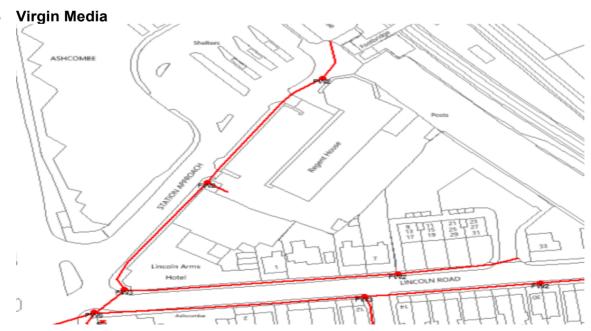


Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		7 of 19



BT Telecommunication Services





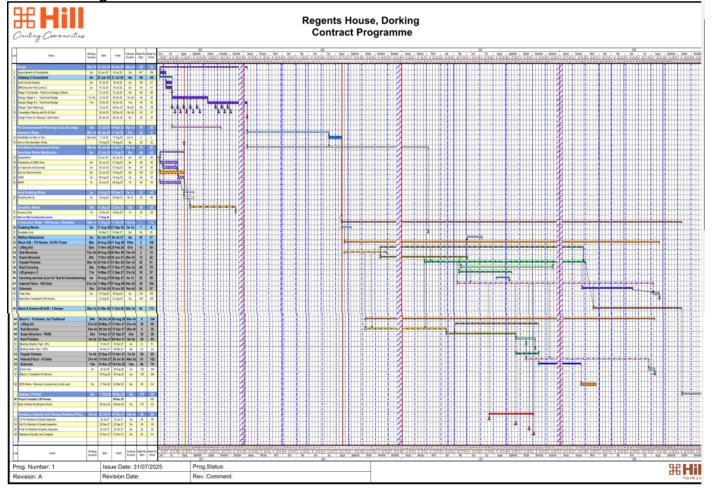
Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		8 of 19



Archaeology/ Ecological

- Following an Archaeological desk-based assessment the site has been assessed as a low risk for Archaeological potential.
- It is deemed that the Proposed Development will not impact on any designated archaeological assets.
- The site is not located within a County Site of Archaeological Importance as defined by the Surrey Historic Environment Record, or an Area of High Archaeological Potential as defined by Mole Valley District Council (MVDC). Additionally, there are no non-designated archaeological assets recorded within the study site by the HER.
- Overall, it is likely that the archaeological potential of the site has been impacted by the effects of past ground disturbance. On balance, it is likely that any archaeological features or finds that may be impacted by the Proposed Development would be of only a low / local significance. Past ground disturbance is likely to have been severe because of the development of the site for residential properties and industrial buildings, before their complete clearance and redevelopment for the existing buildings in the second half of the 20th century. This has been demonstrated by site geotechnical works.

1.1.6 Programme Details



Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		9 of 19



1.1.6.1 Milestone Dates

- Demolition Works & Vegetation/Tree Removal due to commence November 2025
- Hoarding Works November 2025
- Main Construction Works due to commence August 2026
 - o Piling Works Commence August 2026
 - o Substructure Foundations Commence late August 2026
 - Superstructure works commence November 2026
 - o Superstructure topped out & roofs on November 2027
 - o Internal Fit out complete Summer 2028
 - External Soft Landscaping & planting Autumn 2028
 - o Completion of construction Works Winter 2028

1.1.6.2 Protection Measures (During Demolition & Main Construction Works)

Habitats – There are no notable habitats within the site, the site is predominately comprised of
developed, sealed surface, modified grassland and buildings. It is proposed to create habitat
enhancement opportunities into the final soft landscaping and planting scheme.
There are hedgerows on site, these are however due to be removed but will be checked for
nesting birds or other wildlife prior to any works taking place. Demolition works are planned for

There are 3no. trees highlighted within Arboricultural Impact assessment which are located immediately outside of SW boundary labelled T5-C1, T6-U & T7-C1 where root protection measures (RPA) will be put in place prior to works on site commencing in November 2026.

Species -

o Bats

Potential Impacts during demolition works

November to avoid the bird nesting season.

The site's buildings and trees have been surveyed for bat roosts and no evidence of the presence of bat roosts was recorded. However, the presence of roosts cannot be ruled out with certainty due to the constraints upon bat surveys and the fact that bats utilise a number of roost sites throughout the year. Therefore, there remains a low risk of impacts, including the killing of bats and destruction of roosts during demolition of buildings and removal of trees.

Mitigation

If a bat is discovered, work should stop, and an ecologist called immediately.

Any site lighting during the construction phase should face downwards so as not to impact foraging and commuting bats. Lighting of the construction site after dark should be minimised as far as practicable, to reduce the risk of possible disruption to bats and other nocturnal animals.

o Birds

Potential Impacts during Demolition & Tree Removal

Trees and shrubs will be removed to facilitate the development. It is not known that birds are nesting within the buildings.

There is the potential to impact on nesting birds including killing and injuring, and disturbance during clearance and demolition work however works are schedule to commence in November 2025 to avoid bird nesting season.

Mitigation

Demolition will take place outside of the nesting bird season (November). Regardless of this a nesting bird check will be undertaken of the buildings and vegetation to be removed less than 48 hours before removal. If an active nest is found, a suitable buffer, approximately 5 to 10 metres will be put in place until the chicks have fledged the nest.

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		10 of 19



o Badgers

o Potential Impacts during Demolition & Main Construction Works

No field signs of Badger were seen within the site boundary, and it is considered unlikely that this species will be affected by the development. However, Badgers are a mobile species and measures will be taken to minimise the low risk of accidental harm during the works. This may occur if animals fall into open, step-sided trenches left open overnight.

o Mitigation

Any open trenches will be covered at night to prevent Badgers falling and becoming trapped. Alternatively, an escape ramp made from scaffold boards could be left in any such excavation. Excavations will be checked each morning works are scheduled, to remove any animals trapped.

The site will be surrounded by hoarding, which should fit to the ground to ensure that animals (wild or domestic) cannot enter the site once work has started.

Lighting of the construction site after dark should be minimised as far as practicable, to reduce the risk of possible disruption to bats and other nocturnal animals.

1.1.7 Mandatory Requirements Schedule

Hill mandatory operational requirements are set out in the following schedule; this identifies ownership of these controls and where they can be found.

All mandatory and supporting Sub plans are listed in Appendix 1:

Requirement	Responsible
Pre-construction information	Pre- Construction/Technical
Designers risk assessments	Technical
Insurances	Commercial
Site Rules (Hill/Client)	Production
Project Risk Register	All Dept.
Hill Training Matrix	Production Lead
Community Engagement Plan	SVCM/Production Lead
Complaints log	SVCM/Production Lead
Health & Safety File	All Departments/Technical Led
Fire Risk assessment.	Production
Statutory Notifications (F10, Environmental permits)	Technical/Production
Project Meetings	Production Lead

^{*}Identify reference (hyperlink / filing reference) to locate the relevant mandatory document in this schedule and the person responsible for their maintenance and/or development.

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		11 of 19



1.2 The Project Team

For this project, the management structure and details of roles and accountabilities are set out in this section of the Project Delivery Plan.

1.2.1 Project Organisation structure

To follow (Client and consultants)

1.2.2 Details of Delivery Team & Key Stakeholders

Roles and responsibilities for each member of the team shown on the following organograms. The Health and Safety appointments of individuals are identified on the appointments schedule on PDN81.

1.2.3 Roles and Responsibilities

The Project Leader and senior members of the Project team are involved in selection and appointment of individuals to fulfil roles within the project team. Suitability and competence of individuals for each role is measured relative to their skills, qualifications, knowledge and experience.

1.2.4 Competency and Training

A formal up-to-date record of training is maintained for the Hill project team and located on the Hill HSE Training Matrix.

A training and competency matrix and training requirements shall be maintained for Hill personnel; assessed by line managers as part of the appraisals process. Training and further development needs are identified in line with HowNow and the training matrix.

Hill employees must satisfy the mandatory training requirements for their role and responsibilities on the project.

All suppliers and consultants shall only employ competent and trained personnel on the project and shall provide an up-to-date record of relevant training for their personnel employed on the project. This shall be maintained and located on Intranet.

All suppliers and consultants will confirm the requirement for training, qualifications and certification in their operational control plans. This information is required as part of Method Statements and shall be audited upon request by Hill. A record of relevant qualifications shall be maintained, updated and provided to Hill.

1.2.5 Authoring Review and Approval

Arrangements shall be put in place to ensure that the key project documents are authored and approved by the appropriate party. The latest version of each document as identified in the gateway process should be located on Intranet.

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		12 of 19



1.3 Objectives & Targets

Under our commitment to meet customer and key stakeholder requirements and our drive for continuous improvement, Hill has established objectives at appropriate levels to achieve these aims.

1.3.1 Quality & Service Excellence

Specific objectives have been set for Quality and Service Excellence, arrangements for monitoring and reviewing their achievement:

Objectives	Specific Project Strategy to Achieve Objectives		
No RIDDORS	 100% CSCS compliance for all operatives. Robust review and ensuring compliance of method statements and risk assessments. Implementation of Hill best practice procedures. Implementation of relevant Health and Safety meetings as per schedule. Thorough review of any small no lost time accidents or near miss reporting Improvement plans to be developed and implemented by Contractors, as applicable. 		
Completion and Commissioning on Time	 Implementation of Hill planning procedures, including five week look ahead review meetings, contractor weekly work plans, and progress reviews/reports. High quality site records of work activities, including as built reports, piece counts, and photographic reports. 		
No Defects or Snags at PC	 Implementation of Hill QA/QC procedures. Robust review and management of contractor ITP's in regards to work progress. Utilisation of quality software to accurately record and close out defects and snags throughout build sequence. 		
All Handover Documentation provided at PC	Implementation of Hill OA/OC procedures		

1.3.2 Hill Aims & Objectives

The above support Hill corporate objectives for Health & Safety, Environment and Quality.

1.3.3 Client Key Performance Indicators

Objectives	Target	Reporting	Frequency
N/A	N/A	N/A	N/A

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		13 of 19



1.3.4 Considerate Constructors Scheme

This project shall be registered with the Considerate Constructors Scheme which aims to encourage building and civil engineering suppliers to carry out their operations in a safe and considerate manner, with due regard to the surrounding environment.

Hill are required to achieve a score of at least 43 out of 50.

1.3.5 Independent Certification Scheme Requirements

1.4 Information Management & Reporting

This document sets out the minimum requirements for managing information on a project. Information management procedures may vary from project to project according to the contract type, requirements of the project team, or Employers requirements. This document outlines the preferred approach but shall be developed to incorporate the project specific requirements.

1.4.1 Information & Data Management

Unless otherwise dictated by Client, all incoming and outgoing communications shall be dealt with in accordance with Hill requirements.

Information created or generated by Hill and the project supply chain shall be referenced in accordance with the Hill or project agreed protocol and a record of distribution maintained.

Specific details of approval and distribution procedures shall be agreed and documented.

Filing shall be in accordance with Hill procedures, IT Policies and Hill Data Protection Policy. Filing index shall be the same across electronic and hard copy systems. Duplication shall be kept to a minimum.

Beyond being available, information must be easily and conveniently accessible with appropriate controls in place to ensure access is authorised and to protect privacy, confidentiality and integrity. The Hill clear desk policy will be applied to ensure access to information is controlled at all times.

Archiving & Disposal shall be in accordance with Hill procedures and requirements set out for the particular security classification appropriate to the documents.

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		14 of 19



1.4.4 Project Reporting

The project meeting and reporting matrix is located on Intranet. This includes Client, Hill internal reporting and supply chain.

Supplier meetings will be held regularly with the Hill Manager. Suppliers are required to issue a formal report to the Hill Manager in advance of the meeting. The agenda shall include a review of the suppliers' control plans and their performance in meeting the standards and requirements set for the project.

1.4.5 Customer Relationship Management

Project teams will ensure that Client contact details are up-to-date and agreed communication arrangements are implemented.

1.4.6 Media & Public Relations

All matters relating to Media and Public Relations are to be dealt with in accordance with Hill Media and Publications Policy.

For further assistance contact the Hill Communications Team.

1.5 Communications

To ensure that Hill continue to meet Client expectations, Hill shall identify opportunities for improvement and implement any necessary actions to improve the services we provide.

1.5.1 Corporate Responsibility

Industrial Relations

Refer to policies located on the Intranet for Social inclusion, Ethics, Anti-Bribery, Equality and Diversity.

Community Liaison

Arrangements for liaison with local community are set out in the Community Engagement Plan. Prior to commencement, the Supplier shall contact the Environmental Health Officer at the local Council to discuss working methods and measures to be used to minimise disruption.

During the works, communication with neighbours will be maintained as a minimum via notice boards (displaying contact details for key personnel) and newsletters updating progress and key upcoming activities

Complaints

In the event of a complaint from a neighbour, member of the public, Local Authority or any other stakeholder, whether given verbally, in writing or both, it will be recorded in a designated logbook. The complaint will be managed in accordance with the Hill Complaint Handling process (SVCM team).

1.5.2 Onsite Awareness & Instruction

Arrangements for co-operation and co-ordination between all parties involved in the project (including

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		15 of 19



Client, Principal Designer, etc.) and engagement of the workforce is undertaken through regular meetings and the following forums implemented on the project:

Forum	Requirement
Site Induction	All site personnel are required to attend the project operatives' health and safety induction course prior to accessing the site. Inductions must be booked with Hill 48 hours in advance, and operatives must be proof of identity and CSCS competency. This course is based via online platform. Site security access control system rights are issued only on completion of the course. Other inductions must be completed dependent on operative role and workface (i.e. lifting operations induction, supervisor induction, working at height induction).
Visitor Induction	All visitors to site are required to attend the basic site induction providing them with information regarding key risks and control measures on site at that time. All visitors will also be escorted by a fully inducted member of the site team, unless they attend the full site induction. Hill visitor form must be completed and countersigned by Hill management prior to access being granted. Visitor branded PPE must be worn at all times when on site.
Contractor Induction	All contractors are required to undertake their own thorough inductions on every project. The Contractors are also required to conduct health and safety method statement briefing meetings with their employees prior to commencing work on site, as well as daily (or nightly) task / activity briefings.
Quality Induction (AM to review and update)	Suppliers will undertake quality inductions to ensure that quality control requirements set out in Inspection and Test Plans are communicated to those that will be directly carrying out the work. The quality control requirements for the project must be communicated and referenced to benchmark, mock-ups and sample where appropriate. Checking procedures and hold points need to be raised, and the opportunity provided for operatives to give feedback based on their practical experiences. This induction must be specific to the particular trade or activity.
RAMS Briefings	Contractors' shall undertake RAMS briefings to their workforce and any others affected by the work, these shall be recorded. Briefings will take place prior to commencement of the task and shall include an explanation of risks, agreed methods and precautions. Contractors will undertake re-briefing following any changes to the work in hand, or for ongoing works at regular intervals defined within their RAMS
Safety Toolbox Talk Training	Weekly by the contractors' managers or health and safety managers Safety toolbox talks must be on a relevant H&S topic associated with the current or planned imminent works. Toolbox talks may further be instructed at any time to cover learning points from incidents. All Contractor operatives and management are expected to attend monthly site safety stand downs and presentations.
Environmental Toolbox talks	Delivered on a monthly basis by suppliers on relevant environmental issues to raise awareness. When undertaken, attendance records are to be uploaded to Hill bespoke monitoring system to demonstrate good practice.
Quality Toolbox Talks (AM to review and update)	Undertaken by the suppliers' managers / suppliers or Hill Package Managers. Must be on a relevant topic associated with the current or planned imminent works. Toolbox talks may further be instructed at any time to cover learning points from issues identified through quality inspections

Version No.	Version Date	Filing Ref.	Document Ref.	Page Page
1	06/06/2025	Н		16 of 19



Forum	Requirement
3pm Meeting (Daily)	Site activity co-ordination meetings will be held daily at 15:00 to plan and co-ordinate the next day's site activities, and enable Contractors to have appropriate information to relay to their operatives at the next day's Daily activity briefing. Hill and Sub-contractor black hat meeting.
Daily Activity Briefings	DAB's undertaken daily by the contractors' supervisors prior to commencing shift. To communicate requirements regarding high risk activities impacting on planned activities and any key issues / lessons learnt from previous shifts.
Weekly Project Progress Meeting	Regular progress meetings to be held between Hill and supplier supervision to review performance and targets
Design Team Meeting	Design team meetings to review design issues and communicate updates / changes affecting design risk assessments impacting on suppliers' works.
Monthly Internal Team meetings (ITM)	PDN16.

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		17 of 19



1.5.3 Site Training & Awareness

All contractors personnel must have attained and continue to maintain competence in respect of the roles and tasks they undertake.

Each contractor on site is required to maintain an up to date training matrix identifying names, job titles, CSCS card details, training undertaken, dates for refresher training, for each individual on site. A copy of the updated matrix must be issued to the Hill management team each month or this information must be available via a central InnDex system or similar.

1.6 Improvement

To ensure that Hill continue to meet Client expectations, Hill shall identify opportunities for improvement and implement any necessary actions to improve the services we provide.

1.6.1 Lessons Learnt

Lessons learnt exercises shall be undertaken at the end of pre-construction and post-practical completion. Interim reviews / lessons learnt exercises should be carried out to suit the complexity, nature and timescales of the project.

1.6.2 Supplier Performance

Hill managers will report Contractors' performance information on a monthly basis in the Hill procurement database. We will share performance information with our suppliers to assist with improvement of their performance.

1.6.3 Customer Satisfaction

Where the Client is agreeable a Customer Satisfaction Survey will be undertaken to provide feedback on Hill performance to aid our continual improvement programme.

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		18 of 19



2.1 Construction Phase (Health & Safety) Plan

This section of the Project Delivery Plan addresses the arrangements for planning, managing and monitoring the construction phase activities to safeguard the occupational health and safety of all interested parties. It is to be read and implemented in conjunction with other sections of Project Delivery Plan, particularly Section 1 – Project Details. This section is set out in accordance that the Project Delivery Plan complies with the requirements of Regulation 12 of the Construction (Design and Management) Regulations and is based on the Hill Risk Register. These documents are designed to highlight the key risks and overall precautions to be implemented on the project. The pre-commencement risk assessment is located in the Health and Safety folder on Intranet and forms the basis for managing risk on this project.

2.2 H&S Documents

The following Hill documents will be provided to all suppliers and the latest versions are available on Intranet:

- This Project Delivery Plan
- RAMS Appraisal
- Traffic Management and Logistics plan
- · Fire plan and fire risk assessment
- · Project Lifting Plan
- Insert and other relevant plan(s)
- Hill best practice guides

2.3 H&S File

(Outline the arrangements for the collation of the project H&S File – either refer to the arrangements set forth by the Principal Designer or refer to Hill standard approach to collation and hand-over of the documents).

2.4 H&S Co-ordination Roles

The nominated project lead is responsible for allocating key health and safety coordination roles to members of the Hill management team, as soon as possible and before construction.

The project manager is also responsible for maintaining the coordination list, displaying it on all relevant project H&S noticeboards and ensuring all the coordinators are trained sufficiently to undertake their role. This is supported by using the roles and responsibilities board (PDN081)

2.5 Health and Safety Risk Assessment and Method Statements

Supplier risk assessments and method statements (RAMS) will be developed, submitted and reviewed by Hill management team accordingly. The RAMS Appraisal form. The documents and record of review shall be maintained on the Intranet or in the sub-contractor's folder.

2.6 Arrangements for controlling significant site risks

Significant site risks and the management arrangements for their control have been identified from the Pre-commencement risk register located on Intranet and are identified below:

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		1 of 4



Significant Health Risks	High/ Medium Risk Review Required	Control Measures.		
Asbestos	Н			
Contaminated land	L	Ground surveys, soil samples,		
Dust	L		ist be used, reduce the equired, face fit testing	• •
Manual handling	L	Utilisation of mechanical means to reduce the need of manual handling, including tower crane, hoists, and telehandlers when applicable. Contractor method statements must detail manual handling assessments and control measures and ensure that operatives receive manual handling training. Good practice in regard to housekeeping, access and egress, and compliance with Hill standards for temporary ramps.		
Hazardous substances	L	of their method state the use of materials Contractor's enviror storage of COSHH	t submit COSHH assements, detailing how that are hazardous. Immental plans must d materials and the rer In site by licensed con	they plan to control In addition, etail their proposed noval of
Noise and vibration	М	Contractors must detail noise and vibration assessments as part of their method statements, and comply with best practice procedures to mitigate the impact to their operatives and others (including the public). In line with the project Section 61 agreement, environmental monitoring is established on site. Further detail within Environmental Plan.		
Ionising radiation	L	Radon gas.		
UV radiation (sun)	М	Provision will be made to provide effective protection against UV radiation for the workforce, including suncream dispensers in the welfare facilities. In addition, site rules will stipulate minimum clothing requirements (no shorts, no vests etc.), and during warmer months toolbox talks will		
Other significant health risks	L	focus on risks involved in working in warm weather. In line with Hill Group quarterly campaigns, various literature and workshops will be established to discuss with operatives risks associated with general health, including diet and lifestyle choices, and also mental health awareness.		
Delivery and removal of materials and work equipment	L	Refer to Traffic Management and Logistics Plan for further detail.		
Dealing with services	М	Up to date service drawings will be maintained on site at all times, to include as built drawings for ongoing works.		
Accommodating adjacent land use.	L	Key neighbours include:		
Work at height	L	Access equipment, rescue plans		
Version No.	Version Date 06/06/2025	Filing Ref.	Document Ref.	Page 2 of 4



Significant Health Risks	High/ Medium Risk Review Required	Control Measures.
Fragile materials	L	Rescue plans, access requirements,
Lifting operations.	L	Planning, Rescue plans, training and personal.
Plant and equipment.	М	All plant and machinery must comply with all relevant statutory legislation, and copies of inspection certificates must be available for review by Hill on request. This also includes the requirement to conform to NRMM standards. All operatives using plant and machinery must hold a recognised qualification if applicable, and have received adequate training/familiarisation to use the equipment safely.
Excavations and ground conditions	L	Temporary works, planning, rescues procedure. Underground services.
Wells, underground earthworks and tunnels.	N/A	Training, testing, rescue plans.
Work adjacent to water	N/A	Training, rescue plans, rescue equipment?
Vehicle management and community safety	M	Refer to the site-specific Traffic Management and Logistics Plan.
Storage	L	Refer to the site-specific Traffic Management and Logistics Plan.
Other significant safety risks	TBC	

2.7 Site Rules

The generic and site-specific site rules will be identified and communicated in the induction.

2.8 Permit to Work

All specialist high risk operations require specific means of control using a permit to work. Hill operates a number of permit-to-work systems on their projects. Some are under the direct issue and control of Hill Site management. Some are under the direct issue and control of the Suppliers but are co-ordinated via Hill Site management.

- Hotworks Permit
- · Permit to break ground
- Permit to lift
- Permit to remove asbestos
- Permit to load (TW)
- Ladder Permit

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		3 of 4



2.9 Lifting Operations

All lifting activity will require a full lifting plan detailing planning and execution of the activity; details of all temporary works information, designs, calculations, selection of lifting equipment etc. must be included. Reference should be made to the strategic lifting plan located in the Health and Safety folder located on Intranet.

Hill appoint a third party lifting consultant who must to consultant on all lifting activities.

2.10 Traffic Management and Logistics

The Traffic Management and Logistics Plan is a separate document located on Intranet.

2.11 Welfare Facilities

Welfare facilities are provided in accordance with CDM reg's. Facilities are provided for use of all contract personnel, staff, visitors and other people likely to be present on site. Details of these are contained in the Traffic Management and Logistics Plan located on Intranet.

Hill will ensure suitable welfare will be provide and observe the 150m travel guidance.

2.12 First Aid Arrangements

All Contractor's must have an appropriate number of First Aid at Work qualified operatives working on the project, dependent on their total number of operatives and number of work faces. In addition, Contractor's must also ensure they have a sufficient number of well- equipped first aid kits, in relation to the type of works they are carrying out. All projects will have a AED located on site or in the site office.

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		4 of 4



1. INTRODUCTION

This Site Fire Safety Plan is to be completed by the Project Lead before commencement on site with the specific control measures for the identified risks. This document sets out our fire emergency plan to demonstrate how we have complied with requirements of the Regulatory Reform (Fire Safety) Order 2005.

In all cases there should be full compliance with the Joint Code of Practice on the Protection from Fire of Construction Sites and Buildings Undergoing Renovation, HSG 168 (Fire Safety on Construction Sites) and the Site Fire Safety Procedures.

This Site Fire Safety Plan is prepared in conjunction with the Fire Risk Assessment.

The Site Fire Safety Plan will be required from day one of the contract commencing and will then be reviewed on a regular basis.

When a client's own Fire Safety Plan must be complied with as a contractual obligation, these requirements are to be included into this Site Fire Safety Plan. The Project Lead must review any Fire Safety Plans provided by clients and ensure that they are suitable to ensure the safety of persons undertaking duties on behalf of Hill Group.

The Project Lead should wherever practical, ensure the project's programme has been prepared to achieve the early installation and operations of the permanent fire precautions. Where existing fire precautions exist, these should be maintained, protected and utilised (without compromising their integrity) wherever possible.

2. GENERAL DESCRIPTION OF THE PROJECT

We initially need to carry out some site investigation works, demolition of the existing buildings, removal of vegetation, erection of site boundary hoarding and installation of a piling mat. Following approval of our Gateway 2 submission we will begin piling works for the 3 Blocks of apartments. The substructure supports an RC frame which in turn receives SFS and masonry supported brickwork. The structure has both bolt on and inset balconies and flat roofs. The main plant is air source heat pumps supplemented with electrics which will be sited on the main roofs. Internal fit out will be detailed as British Gypsum products. Each building will be serviced with a lift.

Blocks as follows:

Block A is 24 units arranged across 6 St.

Block B is 86 units arranged across 7 St.

Block C is 16 units arranged across 3 St.

3. ORGANISATION AND RESPONSIBILITIES FOR FIRE SAFETY

A site fire co-ordinator should be appointed who will take responsibility for the site fire safety plan and its implementation.

The person with overall responsibility for fire safety on this project is Maziar Kahnamouie

The site team have received specific training which enables them to carry out their role i.e. Fire Risk Management in Construction.

Module 1 - Fire Marshal

Module 2 – Fire Safety Coordinator

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	10/06/2025	G4	HSE124	1 of 13



Module 3 - Fire Risk Assessment

The project Fire Marshals are as follows:

Name	Position	Contact No	Role/Training Module
Maziar Kahnamouie	Siet Manager	07762 984233	Fire Riak Management Module 1

These fire marshals have received training in their role and in the practical use of extinguishers from an approved training provider. In addition to their role in a fire situation they are also responsible for carrying out daily and weekly checks of the fire protection systems and escape routes and conducting weekly alarm tests, monthly emergency lighting testing and periodic fire drills. This information will be recorded using the Site Fire & Emergency Testing Record.

4. FIRE SAFETY RISK ASSESSMENT

The Project Team has undertaken a Fire Risk Assessment of the site with the information as issued by the Client and Principal Designer and the current site conditions.

Fire hazards are identified within the Fire Risk Assessment and recommendations implemented to control them.

The Fire Risk Assessment will be reviewed monthly unless significant changes occur on the project. Any amendments to the site risk assessment or this plan will be recorded in the Construction Phase Plan.

Guidance with the following documents is to be used and followed to complete the Fire Risk Assessment:

- Affinity Fire Housing Developments
- Affinity Fire Blocks of Flats (up to 18m/ 7 storey)
- Any HRB project will require a site-specific fire strategy plan from Affinity Fire. (above 18m)

Fire Safety advice can be obtained through the HSE Department.

4.1. Subcontractor Storage and Offices

Where subcontractors are providing storage and office facilities on site, a separative Fire Risk Assessment (FRA) must be carried out by each subcontractor. This FRA will need to be reviewed every 3 months or as and when required. The FRA should be issued to Hill on completion and after review process.

Risk owner/ Subcontractor	Fire Risk Assessment Received	Filing Location
Hill welfare	tbc	
Hill stores	N/a	
S/C Coshh store	N/a	
S/C Office		

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	10/06/2025	G4	HSE124	2 of 13



4.2. Confined Space Work

Tools used in a confined space will be intrinsically safe and low voltage – specific risk assessment, permit to enter will be developed prior to the commencement of any work

5. LOCATION & CONTROL PLAN FOR DESIGNATED SMOKING AREA

No smoking is allowed in the workplace or anywhere on the project.

Designated smoking areas will be established, which must include a suitable fire point, metal ashtrays and a sperate metal waste bin with metal lid.

"No smoking" signs will be located at the entrance to the site and any buildings and rules regarding smoking explained during site inductions.

Smoking shelters must be non-flammable materials.

The Designated Smoking Area for this site is located at: Outside site on Pier Road

6. SITE FIRE PRECAUTIONS

Contractors working on the premises are briefed in essential fire safety matters including location of escape routes, the sound of the alarm and the location of the assembly point at the site induction.

6.8. Hot work

We ensure that contractors working on [gas and] electrical systems are suitably qualified. Where contractors need to conduct 'hot works' this will be controlled utilising a permit to work system.

Hot work includes welding and cutting, brazing, the use of blow lamps, soldering equipment, bitumen boilers and any other equipment producing heat, sparks or having naked flames. Alternative methods to hot work should be adopted wherever possible.

A 'permit to work' to system for hot work <u>HSE032 Hot Works Permit</u> is a mandatory requirement on all Hill sites.

6.1. Alarm System

The project is covered by a comprehensive interlinked fire alarm system. Smoke detection (where required) and manual call points are located throughout the project and are displayed on the site layout plan which is located at **Appendix A**.

The alarm system is serviced routinely as advised by the alarm provider however servicing will not be more than 6 months, results of tests should be recorded in the <u>HSE118 Site Fire & Emergency Testing Record.</u>.

The alarm system is tested by the Project Fire Marshal on a weekly basis by activating a different alarm call point each time in rotation.

All site staff will be made aware of the alarm testing at the site induction and at the Daily Activity Briefings.

Alarm testing will be conducted – Date to be inserted when confirmed start date on site.

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	10/06/2025	G4	HSE124	3 of 13



During the alarm test, we take the opportunity to check audibility of the alarm throughout the premises and to test the correct operation of equipment connected to the alarm e.g., doors which are held open on devices designed to release automatically on sounding of the alarm, locks which release on sounding the alarm.

6.2. Emergency Lighting

All pedestrian and emergency routes will have suitable lighting in place to illuminate escape routes, fire-fighting equipment, escape signage etc. and to ensure tasks can be brought to rest/made safe when lighting fails.

It is appreciated that escape lighting does not have to meet normal work standards (as detailed in HSG 168) and normal lighting could fail during a fire but should be adequate for people to use the route safely.

7. FIRE FIGHTING EQUIPMENT

7.1. Fire Extinguishers and Sprinklers

We have selected suitable numbers and types of fire extinguishers and located these in accordance with the findings of the Fire Risk Assessment.

The following fire extinguishers are located on the project and shown in the site layout plan at **Appendix A**:

SITE FIRE POINT	FUEL STORAGE POINT	OFFICE POINT	Battery charging Bank
Water/foam	Foam	Co2	N/a
Dry powder	Foam	Co2	

Our fire marshals have been trained in the practical use of extinguishers and the circumstances when they can be safely used and when they should not be used.

Fire extinguishers are subject to an annual servicing contract.

Through our appointed appliance provider servicing will be completed annually, weekly checks will be conducted and recorded in the <u>HSE118 Site Fire & Emergency Testing Record</u> noting that fire extinguishers are correctly located and appear to be in good condition.

8. FIRE ESCAPE DETAILS

8.1. Escape Routes and Exits

Structural fire separation is provided by protected routes surrounded by fire resistant walls, ceilings, and fire doors providing 30 minutes, 1 hour, 2 hours fire protection as defined within the Fire Risk Assessment. Where building alterations take place, which could result in damage to the fire protection, we ensure that the project includes measures to provide temporary protection during the work and to reinstate fire protection to the required level.

Fire doors are kept closed by self-closing devices.

On a weekly basis the project team will check that all escape routes are clear, that exit doors are functioning correctly and that fire doors are either kept shut, kept clear or locked shut as required. If public access is required these checks will be completed daily.

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	10/06/2025	G4	HSE124	4 of 13



When required the condition of each fire door including the presence and condition of door closers, intumescent and smoke seals will be checked weekly.

8.2. Signage

Directional fire escape signs are displayed throughout the building to indicate the location of emergency exits. These signs are illuminated and will be shown on the site layout plan at **Appendix A**.

Signs are also displayed:

- To identify the location of the assembly point.
- To describe the type and function of fire extinguishers
- To describe the correct operation of any exit doors.
- To show 'fire action' required
- To identify fire doors which must be kept shut or kept clear
- To provide the names of fire marshals
- To designate the building as non-smoking in accordance with smoke free law
- To indicate on each lift landing "In the event of fire do not use lift"

All signs comply with the Health and Safety (Safety Signs and Signals) Regulations 1996. As part of our routine weekly inspections completed by the project team to ensure that safety signs are in place and clearly visible.

Fire Safety Box

- Detailed Site Fire Plans to include locations where hazardous materials, chemicals, fuels, LPG and HFL's are stored, gas mains, electrical risers, temporary holes in floor slabs etc.
- · Positions of dry riser inlets and wet risers.
- Nearest Fire Hydrant
- · Temporary buildings or stores within buildings
- Firefighting shafts, fire lifts and temporary hoist facilities if applicable
- COSHH assessments.

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	10/06/2025	G4	HSE124	5 of 13



9. FIRE BRIGADE ACCESS AND WATER SUPPLY

Fire brigade access, facilities and co-ordination arrangements are as detailed below.

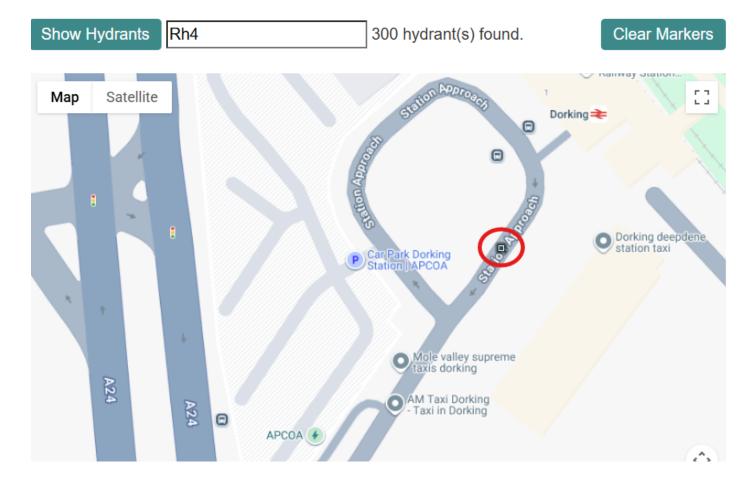
The access points for the Fire Brigade are located at : Station Approach (directly in front of the site)

The water supply arrangements are as follows: Position of street hydrant as per map & picture screenshot below.



Hydrant Mapping Tool

Enter a postcode or partial postcode in the box below and press "Show Hydrants" to display them on the map. You need to include postcode spaces, however, if you wish to limit search to exact postcode district include a hyphen at the end of the district e.g. for N1 write N1-. There is a maximum limit of 5000 hydrants.



Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	10/06/2025	G4	HSE124	6 of 13

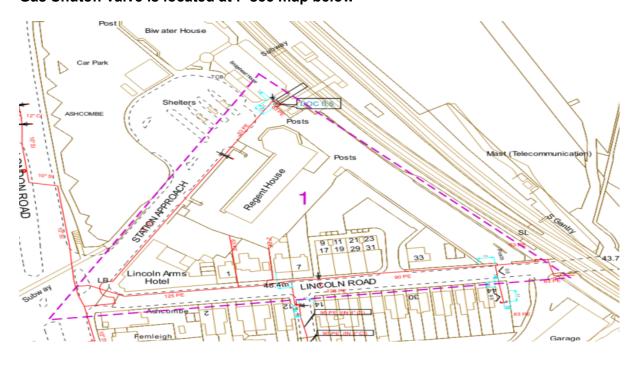


Hydrant location marked



10. LOCATION OF SERVICES

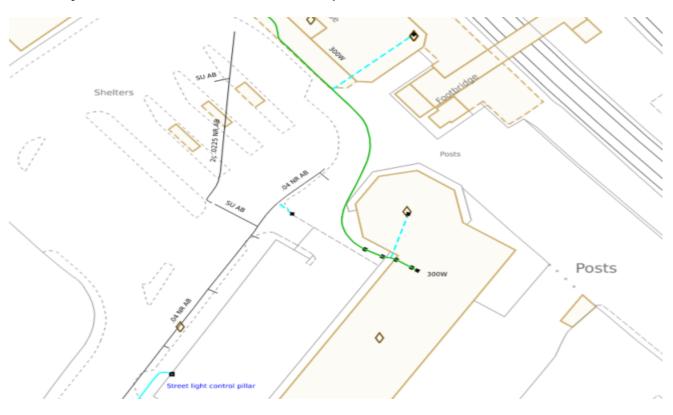
Gas Shutoff valve is located at :- see map below

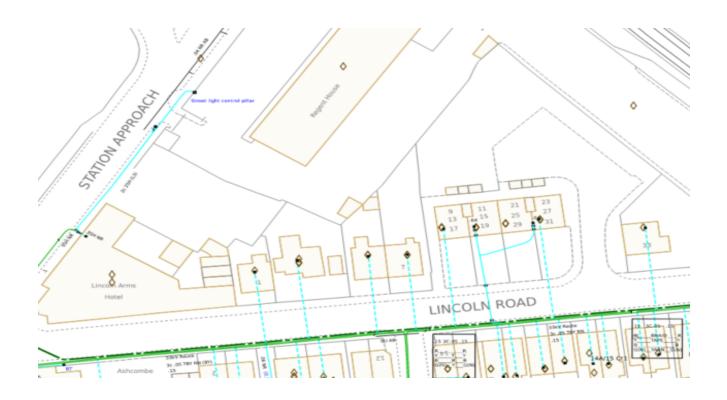


Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	10/06/2025	G4	HSE124	7 of 13



Electricity Shutoff valve is located at :- see maps below





Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	10/06/2025	G4	HSE124	8 of 13



11. ACTIONS ON THE OUTBREAK OF FIRE

11.1. Communication

A representative from Hill Group will be the main point of contact throughout the emergency and will be responsible for alerting the emergency services, all of which have been informed of access routes and the areas of work.

The Assembly Point(s) will be: Outside Main gate then right to side of Main Train Station Entrance



11.2. Action on discovering a fire – Raising the Alarm

- Raise the alarm by operating one of the manual call points
- Attempt to tackle the fire only if trained and if it is safe to do so
- Leave by the nearest available fire exit to the assembly point located at -Train Station Entrance
- Do not endanger yourself.
- Do not use the lifts.

11.3. Action on hearing the alarm – all persons except for Fire Marshalls

- Do not stop to collect personal belongings
- Close windows and doors if it does not cause undue delay

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	10/06/2025	G4	HSE124	9 of 13



- Escort any visitors and leave by the nearest available exit and go to the assembly point ______
 (Detailed on Appendix A -Site Layout Plan)
- Do not use the lifts
- Check that someone has called the Fire Brigade.
- Do not return to the building until given the 'all clear' by the Fire Brigade.

11.4. Action on hearing the alarm - All Contractors

- Isolate gas appliances
- Turn off all mechanical plant
- Go to the assembly point
- Senior person to account for his staff

11.5. Action on hearing the alarm - Project Lead

- Call the fire brigade immediately to every fire or on suspicion of fire:
 - o Give full site address and sector number where possible.
 - Give operator your telephone number and ask for FIRE
 - Do not end call until site address has been repeated by the fire brigade.
- Obtain details of the incident
- Appoint person to direct emergency services
- Appoint person to man the telephone
- Go to the assembly point and assess the position
- Check with contractors if any operatives are missing
- Receive and brief emergency services. The nearest A & E Hospital address and telephone number will be displayed on the Site Noticeboard.

11.6. Action for Fire Marshalls on hearing the alarm

- Check which zone has been activated by viewing the alarm panel
- So far as possible without taking risks, check that all areas of the floor are clear of people including stores, toilets and kitchen. If there are two fire marshals on duty, the search will be coordinated between them
- Shut off machinery
- Once the building is clear, go to the assembly point closing doors behind you.
- Meet the Fire Brigade and report any persons who remain in the building, report on areas not able to be checked, any signs of fire observed, and the zone indicated on the panel
- Prevent people from re-entering the building
- Once the Fire Brigade announce that the building is safe, tell assembled staff that they may return to the building.

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	10/06/2025	G4	HSE124	10 of 13



All Fire incidents, <u>no matter how slight</u>, must be recorded on an <u>HSE024 Incident Report Form</u> and the appropriate company representative telephoned.

11.7. Vulnerable People

Those falling into this category include:

- Disabled
- Pregnant Women
- Young Persons (16 18)

Members of staff are to advise the site team of any disabilities they may suffer to enable a risk assessment to be made. Likewise female staff should advise as soon as they are confirmed as being pregnant so an assessment can be completed and any necessary changes to the work / emergency process can be made.

A <u>HSE092 Personal Emergency Evacuation Plan (PEEP) Form</u> should be completed to ensure those with identified needs can be assisted to evacuate the site safely.

Fire Marshals covering the area where these people work are to be notified so they can assist in the evacuation of the vulnerable person.

Young persons are to be consulted in the completion of a <u>HSE080 Young Persons at Work General Risk</u> Assessment and steps taken to ensure adequate supervision and control such that the risks are minimised.

12. SITE SECURITY

The most effective method of deterring trespassers, as well as preventing malicious fires, is to erect a hoarding or fence around the perimeter of the whole site or securing all access points such as windows and doors on refurbishment projects.

Where such a hoarding or fence is impracticable, buildings, flammable liquid stores, LPG storage and combustible material stores must be fenced or otherwise suitable protected.

Illumination of the site is an additional deterrent to unauthorised access and is recommended where appropriate.

On high risk projects, the use of CCTV cameras or intruder alarm systems is an option that should be seriously considered.

Where 24hour security is provided, fire checks should be undertaken throughout the night as well as during holiday periods and at weekends.

13. MATERIALS STORAGE AND WASTE CONTROL REGIME

13.1. Storage of highly flammable liquids and LPG etc.

Flammable liquids and gases used and stored on site must be subject to a periodic assessment in compliance with the Dangerous Substances and Explosive Atmospheres Regulations 2002 and must be stored in accordance with the <u>Site Fire Safety Procedures</u>.

13.2. Temporary Covering Materials

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	10/06/2025	G4	HSE124	11 of 13



Where temporary coverings are provided, they will be made of a UKAS and the Loss Prevention Certification Board (LPCB) accredited fire-retardant material, so they do not add to the fire loads and prevent the potential for fire growth and spread.

13.3. Waste Materials

All waste is a potential fire risk and will subsequently be removed from site as soon as possible. The siting of waste skips will when possible be away from combustible materials, other structures and should be covered / locked where there is a foreseeable risk of arson.

14. FIRE DRILL PROCEDURE AND TRAINING

14.1. Fire Drills

Fire drills are carried out at least every 3 months and recorded in the <u>HSE118 Site Fire & Emergency Testing Record</u>

A proportion of drills are undertaken whilst simulating the lack of availability of at least one exit.

14.2. Training

All new starters to the project are provided with information on emergency procedures including the location of escape routes, the sound of the alarm and the location of the assembly point prior to commencing work.

All Hill staff receive refresher training every 3 years in fire safety and fire procedures. Those with fire safety roles such as Fire Marshals are provided with training and instruction in their responsibilities.

Records of all training are held with Training Department.

All site workers are to be briefed on this Site Fire Safety Plan. They should be fully aware of and understand its contents. They are to be informed of any subsequent changes / updates to the plan.

15. TEMPORARY ACCOMMODATION UNITS

15.1. Location and fire integrity of TAUs

Location, siting, and use of TAUs needs to be managed in accordance with the findings of a fire risk assessment, undertaken prior to delivery. Proximity of other buildings, plant, vehicles and means of escape from adjacent buildings must be considered.

Temporary Accommodation Units (TAU) will be located at least 10 metres away from the building under construction, refurbishment or other permanent buildings. Where this distance is not possible all temporary cabins/offices provided for use should be AT LEAST 30 minutes fire resistant and comply with the requirements of BS 476.

Where the fire break is less than 6m or where the units are vertically stacked, TAUs must be constructed with materials that do not significantly contribute to the growth of a fire, or the propagation of smoke and/or corrosive fumes.

The use of deep fat friers of any style or size are strictly prohibited.

15.2. Fire-fighting equipment

All TAU's, however simple, should be provided with some form of fire- fighting equipment and enough handheld extinguishers. Most typical fire risks in TAU's involve materials such as paper and wood and

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	10/06/2025	G4	HSE124	12 of 13



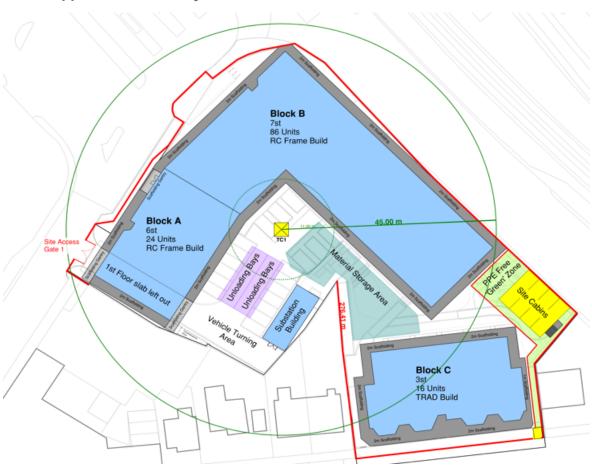
therefore water-based extinguishers should be provided for this. Where large pieces of electrical equipment are used (e.g., computers or photocopiers) carbon dioxide extinguishers should be provided.

In kitchen and canteen areas, where cooking oils are used, appropriate extinguishers (foam or dry powder) and a fire blanket should be provided.

15.3 Commercial Food Trailers

Commercial grade food trailers are permitted to have deep fat fryers are long as they are a minimum of 10 meters from any structure, independently insured and fully comply to an individual Fire Risk Assessment. Correct fire extinguisher must be in place i.e. Wet Chemical.

16. Appendix A - Site Layout Plan



17. Appendix B -Fire Risk Assessment

TBA

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	10/06/2025	G4	HSE124	13 of 13

Section 4: Regents House Emergency, Accidents & Incident Arrangements



Emergency, Accident and Incident Arrangements

This section details requirements for planning, managing and monitoring health & safety and environmental arrangements for accidents and incidents.

Hill Emergency preparedness and response procedures to be printed and followed onsite - IMS-8.2-001 Emergency Preparedness & Response Procedures

Accidents, Incidents and Emergency Response

We must identify potential emergency situations, including those with the potential for adverse environmental impact(s), and know how to respond to them.

Emergency Response Procedures

Emergency Response Planning

- Site Management will produce Emergency Response Plans (to include an Environmental Incident Response Plan) for the site.
- Site Emergency Response Plans to be prominently displayed within site office
- Site Management must inform operatives of the site specific emergency response procedures and ensure that they comply with the arrangements in place
- Any emergency response equipment required should be adequately provided and kept in appropriate
- locations
- Emergency Response arrangements should be tested regularly. The results should be documented with photos. Testing should include:
 - o Fire Drill sites to complete every 3 months
 - Spills Drill sites to complete every 6 months. Practice clearing up a mock spill and cover lessons learnt with subcontractors, where appropriate (e.g., Forklift/Plant Drivers)
 - o Crane Rescue Drill- sites with cranes should complete every 6 months (dry drill without opening up the kit) physical training must be carried out via Hill designated training company.
 - Working at Height Rescue Drill sites to complete every 6 months. To include deep excavations as well as working from scaffolds and RC frames.

The details and results of testing should be recorded in HSE118 Site Fire & Emergency Testing Record.

Emergency Response

- · All work should stop in the area of the incident
- Attempt to control incident immediately do not put the health and safety of yourself or others at risk
- In the case of a major incident Site Managers should immediately inform their Contracts Managers
- In the case of a major incident with implications beyond the site boundary Contracts Managers are to notify the relevant authority and the client
- Site Management will complete an Incident Report and upon completion of corrective/preventive action, forward a copy to the HSE Department via HSE@hill.co.uk
- Site Management will maintain an Incident Report Register
- Where an incident was unforeseen this will be reviewed and the recommendations for reducing the
- chances of a re-occurrence will be communicated back through the business by the HSE Department.

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		1 of 3

Section 4: Regents House Emergency, Accidents & Incident Arrangements



Client Reporting Procedure:

Development Critical Accidents and Incidents Communication Plan

RIDDOR (critical) accidents and incidents - all reportable accidents and incidents under RIDDOR regulations Non-RIDDOR critical accidents and incidents - uncontrolled events where a serious/life changing/life threatening injury could have occurred but did not occur Any person who identifies a critical incident must inform the Principal Contractor's Site/Project Manager Principal Contractor's Site/Project Manager to: Immediately notify via phone call (and sms/text, if phone is not answered): Provide initial incident details (see Clarion's Construction Delivery Manager. requirements below) in writing to Clarion's: If unavailable, contact Clarion's Head of Construction Regional Construction Directors If unavailable, contact Clarion's Regional Construction Director National Construction Director If unavailable, contact Clarion's National Construction Director HSWQ Lead within 24 hours of If unavailable, contact Clarion's HSWQ Lead the incident Construction Delivery Construction Delivery Manager to check Manager to inform Clarion's that the following Clarion representatives Press Office if necessary have been notified: Head of Construction Delivery Press Office to trigger Major Regional Construction Director Incident Policy or Crisis National Construction Director Management Procedure if HSWQ Lead required Principal Contractor to complete investigation and provide a full (de-If unsatisfactory or where concerns/queries identified) investigation report to exists, Clarion HS&W Team to escalate to Clarion's HS&W Sponsor and HS&W (Regional) Managing Director, Construction Team within 24 hours of the final Director and/or Partnership Director. report being issued (and ideally within two weeks).

Note:

- The Principal Contractor's Site/Project Manager is to follow this plan and communicate in the following
 order: call (or sms [text] if the phone is not answered) as soon as possible after the accident or incident and
 email initial incident details to the Clarion representative identified above within 24hrs.
- Where other offsite incidents occur, which can have an impact on Clarion related activity and or reputation, the Principal Contractor's Site/Project Manager is also to activate the plan.

Initial incident details (with 24 hours in writing):

- Type of accident or incident e.g. RIDDOR or non-RIDDOR critical
- · Date and time of accident
- · Number of persons sustaining injuries (if applicable)
- Summary of accident or incident
- Immediate cause(s) of accident or incident
- Any Enforcement Authority interest
- Immediate actions taken

Note: Other minor accidents and incidents (same details required as above) to be reported in monthly site meetings.

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		2 of 3

Section 4: Regents House Emergency, Accidents & Incident Arrangements



The Principal Contractor will notify Clarion of any significant (critical) accidents and incidents within 24hrs, and follow the plan for the below:

- Critical (RIDDOR and Non-RIDDOR) accidents and incidents
- Significant security breaches an incident which results in unauthorised entry onto site
- Uncontrolled release of hazardous substances including but not limited to asbestos
- Service strikes
- Injuries involving a member of the public (MOP) including critical (RIDDOR and Non-RIDDOR) accidents and incidents involving a MOP
- Enforcement notices and actions by an enforcing body
- Unplanned and or uncontrolled fires and explosions
- the commencement of any criminal prosecution under health and safety legislation
- any incident having health and safety implications which attracts the attention of the police and/or the media

The Principal Contractor will provide the following monthly:

- a. Number of RIDDOR accidents and incidents reportable accidents and incidents under RIDDOR regulations
- b. Number of non-RIDDOR critical accidents and incidents uncontrolled events where a serious/life changing/life threatening injury could have occurred but did not occur.
- c. Number of critical hazards identified anything that can cause serious/life changing/life threatening or fatal injury. This difference between this and critical accident/incident above is that one (b) is active i.e. event has occurred while the other (c) is passive i.e. event has not/ is waiting to occur.
- d. Number of non-RIDDOR non-critical accidents (first aid/minor and 7 days (or less) lost time injuries) event that leads to first aid/minor and lost time [7 days (or less)] injuries
- e. Number of non-RIDDOR non-critical incidents (near misses) as above but with no injuries
- f. Number of non-critical hazards identified same as critical hazard but unlikely to cause serious/life changing/life threatening or fatal injury
- g. Total person hours worked
- h. Average number of people on site in the period
- i. Number of person days lost due to accidents or ill-health incurred by workers
- j. Number of accident investigations carried out in the period
- k. Number of site inspections, tool-box talks, etc. completed
- I. Number of visits by the HSE, Local Fire Authority, the Police and Environment Agency to the site
- Number of enforcement notices served by the regulatory authorities e.g. improvement, prohibition, warning notices

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	H		3 of 3



5.1 Environmental Management Plan

This section of the PDP deals with the environmental aspects of the project. It defines the procedures for achieving the objectives set out in the Company Environmental Policies and any identified environmental performance targets for the project.

It sets out the approach to environmental management throughout the demolition and construction phases with the primary aim of reducing adverse impacts from construction on the environment and improving the overall environmental performance of Hill.

Key actions discussed throughout this environment section are shown in the table below. Associated documents are located on the Intranet management System.

5.2 Environmental Documents

The following Hill documents will be provided to all suppliers and the latest versions are available on Intranet:

- This Project Delivery Plan
- Method Statement Company Guidance
- Logistics & Traffic Management Plan
- · Aspects and Impacts Register

5.3 Arrangements for controlling significant site risks

significant site risks and the management arrangements for their control have been identified below:

Significant Environmental Risks	Control Measures.
Emissions to Air, Ground, Water courses.	 All activities that are likely to cause emissions must be managed accordingly. Where possible, dusty activities must be damped down. Min M Class Vacuums should be used on equipment that has potential to emit dust.
Noise	Mitigation requirements are contained within the agreement and must be complied with.
Pollution and Environmental Damage	 Spill kits will be located on site and personnel trained in their use. All fuel and chemicals will be bunded to 110% and located on hard standing areas, away from drainage points.
Vibration	 Significant vibration works will be closely monitored. Vibration reduction controls will be implemented on all tools and plant.
Ecology and wildlife	 No protected species have been identified in site surveys. Trees and hedgerows must be inspected for nesting birds prior to commencement of any works likely to cause noise or vibration. Excavations must always be covered in to avoid injury to straying nocturnal animals and left with a means of escape to ensure no animals are trapped
	 In the unlikely event that great crested newts are discovered on site, works should pause and ecologists should be contacted for further advise.



	 In the unlikely event that a bat or evidence of bats is discovered during the development all work must stop, and a bat licensed ecologist contacted for further advice. Works to be carried out during daylight hours, when hedgehogs are less likely to be active. If any common wildlife is found in the working area, these should be encouraged to disperse of their own accord or, if at immediate risk, should be moved by hand to a sheltered, vegetated area away from disturbance.
	TBT to be given to all site personal and in particular all of the above points.
	Protection measure to be implemented as per site survey.
Flora and fauna	Inspection regime to be followed.
	TBT to be given to all site personal.



5.4 Noise and Vibration Procedures

Hill shall review all suppliers proposed methods for noise and vibration control and mitigation. This information will form part of the subcontractors RAMs which are reviewed and approved by Hill.

5.5 Control of Emissions to Air

All developments should comply with the Mayors and Association of London Government's (ALG) London Best Practice Guide on the Control of Dust Emissions during Construction and Demolition (July 2014).

Non Road Mobile Machinery (NRMM) requirements will be met as a minimum on required sites. Records will be retained on the Register of Plant and Equipment.

Non-Road Mobile Machinery (NRMM) | London City Hall

5.6 Noise Monitoring

The site Management Team will carry out noise monitor readings twice daily and keep all records. Noise mitigation measures will be put in place should the limits be exceeded.

5.7 Waste Minimisation and Management

Hill are committed to reducing the volume of waste produced through the application of the waste hierarchy in all its activities.

Hill use Smartwaste to manage and record all of it waste and energy requirements.

All Suppliers with responsibility for their own waste streams must provide the following documents:-

- Material Management Plan;
- Non-Hazardous or Hazardous Waste Carriers Licence issued by the Environment Agency for all companies removing waste;
- Environmental Permits (Waste Management Licence) for all facilities where all the hazardous and non-hazardous waste streams are transported to;

Transfer notes for controlled waste and consignment notes for hazardous waste must comply with regulatory requirements. Sufficient information must be provided to ensure that the waste disposal operator is aware of the potential hazards of the substance.

All Suppliers responsible for removal of their own wastes must report waste quantities (as tonnage) for each waste stream. Supporting Waste Transfer Notes must be made available to the Hill immediately on request.

Waste storage must comply with both pollution prevention legislation (PPG6) and waste permitting legislation. Should the site require any permitting for items such as waste water, crush material etc. they must contact their Sustainability Manger in advance to ensure full compliance.

5.8 Responsible Sourcing

Prior to commencement on site confirmation of validated chain of custody certification or

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		3 of 20



responsible sourcing certification shall be provided by the supplier.

Suppliers will provide copies of delivery notes confirming the date of delivery, delivery location, type and quantity of materials.

When delivering timber to site delivery tickets must comply with the EU timber regulations. For more information please refer to Hill document Timber Procurement.

5.9 Biodiversity requirements

The requirements of the all relevant legislation and policy guidance (e.g. <u>Hill Biodiversity Policy Statement</u> and local BAP) in respect to species and habitat conservation shall be complied with. In the event of any unanticipated discoveries, work will halt in the area and Hill will be informed.

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		4 of 20



1. PROJECT INFORMATION

1.1 Introduction

Description of the site	Vacant Possession site which requires further soil Investigation Surveys and Demolition of unoccupied residential & office buildings prior to installing a pile mat.
Description of the contract works.	New build construction of 126 residential units over 3 Blocks for Clarion Housing Group. These units will be available for affordable rent.

1.2 Environmental sensitivities include:

Item	Receptor	Description	Yes/No	Comments
1.	Watercourses	Site is adjacent to major watercourse	No	
		Site is adjacent to minor watercourse	No	
		There is a major watercourse/water body on the site		
		There is a minor watercourse/water body on the site	No	
2.	Groundwater	The site is over a major aquifer.	No	

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		5 of 20



Item	Receptor	Description	Yes/No	Comments
		The site is over a minor aquifer.	No	
		The site is over a non aquifer.	No	
		The site is adjacent to a potable water source.	No	
		The site contains a potable water source.	yes	Disconnections have been applied for and will be made at site boundary.
3.	Designated nature conservation sites	The site is adjacent to a Site of Special Scientific Interest.	No	
		The site is adjacent to a National Nature Reserve.	No	
		The site is adjacent to a Local Nature Reserve.	No	
		The site is adjacent to an area identified by the local authority as having nature conservation interest	No	

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		6 of 20



Item	Receptor	Description	Yes/No	Comments
		The site is adjacent to an area identified by others e.g. a wildlife trust, as having nature conservation interest.	No	
4.	There are trees on the site.		Yes	These are small and are due for removal during the enabling works Phase (No TPOs in place or trees within the site to be retained)
			No	
		There are trees on or outside the boundary in a sensitive location.	Yes	There are 3no. trees highlighted within Arboricultural Impact assessment which are located immediately outside of SW boundary labelled T5-C1, T6-U & T7-C1 where root protection measures (RPA) need to be put in place prior to works on site commencing.
5.	Hedgerows	There are hedgerows on the site.	Yes	These are however due to be removed but will be checked for nesting birds or other wildlife prior to any works taking place.
6.	Protected species	There is protected wildlife on the site.	No	
		There are protected plants on the site.	No	

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		7 of 20



Item	Receptor	Description	Yes/No	Comments
7.	Archaeological interest	The site has potential archaeological interest.	Yes	A written scheme of investigation has been submitted and approved by the LPA. Following demolition the exploratory works will be carried out.
		The site has known archaeological interest.	No	
8.	Rights of way	There are rights of way across the site.	No	
9.	Adjacent properties	There are residential properties adjacent.	Yes	There are new build properties currently being constructed next to the site.
		The site is adjacent to other sensitive properties (e.g. hospital, school, farm, crops etc).	Yes	Adjacent to a railway station, public car park and a public house.
10.	Part completed development	There are completed residential or other properties on site.	No	
11.	Services	There are existing services on site.	Yes	See section 1.1.5 within this document
12.	Substructure	Foundations, services.	Yes	

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		8 of 20



1.3 POTENTIALLY DAMAGING CONSTRUCTION ACTIVITIES

Bats

Potential Impacts

The site's buildings and trees have been surveyed for bat roosts and no evidence of the presence of bat roosts was recorded. However, the presence of roosts cannot be ruled out with certainty due to the constraints upon bat surveys and the fact that bats utilise a number of roost sites throughout the year. Therefore, there remains a low risk of impacts, including the killing of bats and destruction of roosts during demolition of buildings and removal of trees.

Mitigation

If a bat is discovered, work should stop, and an ecologist called immediately.

Any site lighting during the construction phase should face downwards so as not to impact foraging and commuting bats. Lighting of the construction site after dark should be minimised as far as practicable, to reduce the risk of possible disruption to bats and other nocturnal animals.

Birds

Potential Impacts

Trees and shrubs will be removed to facilitate the development. It is not known that birds are nesting within the buildings.

There is the potential to impact on nesting birds including killing and injuring, and disturbance during clearance and demolition work.

Mitigation

Demolition should take place outside of the nesting bird season (September to February). If this is not possible a nesting bird check will need to be undertaken of the buildings and vegetation to be removed less than 48 hours before removal. If an active nest is found, a suitable buffer, approximately 5 to 10 metres will be put in place until the chicks have fledged the nest.

Badgers

Potential Impacts

No field signs of Badger were seen within the site boundary, and it is considered unlikely that this species will be affected by the development. However, Badgers are a mobile species and so measures should be taken to minimise the low risk of accidental harm during the works. This may occur if animals fall into open, step-sided trenches left open overnight.

Mitigation

Any open trenches will need to be covered at night to prevent Badgers falling and becoming trapped. Alternatively, an escape ramp made from scaffold boards could be left in any such excavation. Excavations will be checked each morning works are scheduled, to remove any animals trapped.

The site will be surrounded by hoarding, which should fit to the ground to ensure that animals (wild or domestic) cannot enter the site once work has started.

Lighting of the construction site after dark should be minimised as far as practicable, to reduce the risk of possible disruption to bats and other nocturnal animals.

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		9 of 20



1.4 Clients Environmental Requirements

The Company shall undertake to work in line with environmental requirements. These are stipulated in

- Appropriate UK legislation
- HPL EMS and Environmental Policy
- The Clients tender documents

1.5 Environmental Management System

This Environmental Management Plan is the vehicle for implementing the Company Environmental Management System. It is intended to set out the minimum standards for all project related activities and to provide a framework for managing and controlling the environmental issues associated with the site. The environmental risk register reviews the aspects and impacts of each task and the control and mitigation measures available to reduce any highlighted impacts.

Subcontractors will be made aware of the Policy through site inductions, briefings and training as required

1.6 Structure & Responsibility

Senior management will assume full responsibility for the Environmental Management Plan and will delegate to the line managers the responsibility for implementation.

1.7 Training

Training will be identified for all staff during the individual's annual review. Additional training and refreshers will be given through the following media,

TRAINING TYPE	LOCATION OF RECORDS
Environmental site induction – all staff	Maintained on site
Environmental Tool Box Talks – labour	Maintained on site
(minimum of 1/month)	
Site Managers Training Course	Training and Personnel

13. Aspects and Impacts

IMS21 Aspects & Impacts Register (Group).xlsx

All sites to update and review the Hill Aspects and Impacts Register and ensure site specific.

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		10 of 20



14. ENVIRONMENTAL LEGISLATION & OTHER REQUIREMENTS

HPL will carry out the works in accordance with relevant UK legislation. The Quality Systems Manager maintains a full list of applicable legislation relevant to all tasks.

15. ENVIRONMENTAL OBJECTIVES & TARGETS

The environmental objective for the project is to ensure that all practical steps are taken throughout the contract to minimise the environmental impacts. Site-specific impacts and mitigation requirements highlighted from the environmental risk assessment and the documents supplied by the Client include, but are not limited to:

Compliance with Client requirements and Regional Business Plans (see relevant document for details)

- Reduce waste
- Minimise water pollution
- Minimise nuisance issues

As a result of these findings, the targets are and site recorded monthly on our KPI return:

No.	Safety and audit			Target	
1	Accident Incident Rate (AIR)	PD	<75% of Industry average - HBF figures 2020 is an annualised figure 263	197	
2	Average site safety inspection score	PD	All sites to maintain min 82% score	82%	
3	MSite Online inductions	PD	Min 80% use of MSite 'off site' inductions	80%	
Community					
4	Average Considerate Constructors Scheme score	PD	Based on all sites measured within the period; average over 2 inspections	40	
5	Group to gain at least 3 CCS award per year	PD	All group operational regions	3	
	Environmental & Energy				
6	% Total waste diverted from landfill tonnage	PD	Divert 95% of waste produced from landfill	95%	
7	Reduction in Tonnes construction waste/£100k project value	PD	<90% reduction in 'Tonnes Construction waste/£100k project value' (2020 9.45t/£100k)	1.4	
8	kgCO2e from energy use/£100k project value	PD	<65% of Industry average Industry value for 2018 is 363kg/CO2e	146	
9	Total water use m3/£100k project value	PD	<65% of Industry average Industry value for 2018 is 5.8m3	2.8	

1.1. Records

Records shall be compiled by HPL of any relevant environmental information that should be made available for any subsequent work or maintenance on the site. These shall include any pollution incidents, responses, actions taken and audit reports.

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		11 of 20



1.2. Communication

SPECIFIC TO THIS CONTRACT

RECORD	MAINTAINED BY	LOCATED	COMMUNICATED TO
EMS	Site Manager	In Site Manager's EMS File	All site staff (direct and indirect)
Site Inductions	Site manager	Site Office	All staff (direct and indirect)
Toolbox talks (1 per month)	Site Manager	Site Office	Labour as appropriate
Spillages	Site Manager	In Site Manager's EMS File	All staff (direct and indirect)
Complaints	Site Manager	In Complaints register	Contracts Manager and Env Manager

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Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		12 of 20



2. OPERATIONAL CONTROL

Method statements or toolbox talks will consider the significant environmental impacts identified in the risk register and address the issues in order to supply mitigation measures wherever possible.

2.1. Emergency Preparedness and Response

Site Managers are responsible for ensuring the site staff have been fully briefed on how to respond to emergency environmental incidents, the Quality Systems Manager has trained site managers, knowledge is tested at audits. Any specific training requirements will be brought to the attention of senior management and appropriate training arranged. The Pollution Incidence Control Plan will be displayed on all appropriate site notice boards and brought to the attention of all staff during their induction. A supply of absorbent granules containing oil digesters will be maintained on site at all times in sufficient quantities to deal with small-scale spillages and all staff will be aware of where these granules and appropriate shovels etc are stored.

Serious incidents must be immediately reported to the Quality Systems Manager and Senior Management in order for them to notify the nominated Clean-up contractor and the Environment Agency. The incident will be recorded, reported to the Client, Site Manager and the Quality Systems Manager who will conduct an investigation into the cause and effect of the incident, recommending an appropriate change in procedures where necessary.

All incidents requiring use of the absorbent materials will be recorded on the reporting form **Appendix A** and returned to the Environmental Advisor.

2.2. Site Waste Management Plan

Legal Requirement removed

All waste will be stored on site in suitable containers and removed in accordance with best practice requirements.

Good management will require the waste disposal route to be validated through the use of a phone call to the designated site. In normal circumstances this will only be necessary if the integrity of the haulage company becomes doubtful.

Waste reduction will follow the requirements of the waste hierarchy, reduce reuse, recycle, recover, regard waste as a resource not something that decreases the bottom-line. In order to reduce waste, waste streams will be segregated whenever possible to increase the re-use or recycling of material.

Wherever possible waste disposal shall be minimised through good management of housekeeping, a review of the design process and imaginative recycling. Buying materials will be checked against any value engineering and the QS will have knowledge of materials in the yard and on order at all times. Demolition materials will be counted as separated factions if they are sent for crushing by the demolition contractor and this is confirmed.

2.3. Permissions and Consents

Consents required may include:

- Hazardous Waste pre-registration,
- the site will be registered by HPL as a hazardous waste producer if hazardous waste is present.
- Number: CMO to provide when notified
- Any other consents required for water abstraction / discharge; waste exemptions or wildlife

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		13 of 20



2.4. Traffic Management Plan

The Site Manager is responsible for identifying and securing traffic management consents and for maintaining consultation with the client. Further details of traffic routes to and from site see Section 1 – 1.1.1

Plan below shows location of wheel wash stations on each vehicular gate, all vehicles will be celaed and inspected prior to leaving site.



2.5. Noise and Vibration

HPL will implement best practice throughout the contract. Regular meetings will be held with the clients at which noise can be discussed. All mitigation measures will be employed including the programming of the works.

Plant will be requested as electric or super-silenced diesel as practicable if required. If necessary, plant will be screened.

2.6. Dust

Dust will be controlled mainly through the use of dampening down with a fine mist of water and using dust suppressant tools. Enabling works will be monitored for dust and noise. Skips will be sheeted before leaving the site if the contents are likely to cause a nuisance.

2.7. Air Pollution

Air pollution will be controlled through regular maintenance of plant and additional servicing when required. All plant will be switched off when not in use.

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		14 of 20



Substances emitting strong odours will be investigated for an alternative equivalent product. There is a presumption of water-based paints both internal and external.

2.8. Water

No substance will ever be discharged to a surface water drain; foul water drains may be used to dispose of some silty or foul water **IF** the consent of the sewerage undertaker has been sought. Management of activities through method statements, toolbox talks and inductions will ensure the workforce are aware of the need to retain water quality. Activities like concrete pours and washing out the chutes must be managed effectively.

Potentially polluting substances will be stored in suitably bunded areas in order to reduce the potential for ground contamination and, therefore, groundwater contamination. If polluting substances penetrate the ground the ground will be dug up and removed and replaced with a suitable replacement material. The polluted, excavated material will be disposed of according to legislative requirements. This is in order to prevent redress under the Contaminated Land Regulations 2000 and remove any potential expensive clean-up claims. Absorbent material containing oil digesters will be stored on site for use on minor spillages. If a pollutant can be soaked up before it penetrates the ground it should be. If a spill does occur a monitoring regime of the canals and rivers will be implemented to ensure the pollution does not reach the water courses and if it does it will be promptly and efficiently managed. The statutory bodies and client will be notified and a clean up operation begun as per the company procedures.

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		15 of 20



2.9. Diesel

All diesels should be stored in double skinned mobile bowsers or double skinned diesel tanks. A designated re-fuelling (hard-standing) area will be made available for plant that is 10 metres plus from any drains. All diesel/ hydrocarbons and potentially harmful substances not stored within a double skinned bowser will be stored in a bunded area. The bund will comply with Environment Agency recommendations and UK legislative requirements. When there are a number of drums stored within the bund the bund will be capable of holding not less than 150% of one of the drums. All drums and their bunds should be covered with something like a tarpaulin to prevent collection of rainwater, an expensive commodity to remove as hazardous waste. Any diesel in a single skinned tank will be placed within a bund that will be impermeable and be capable of holding 110% of the contents stored within it.

2.10. Ecology

There are four statutory designated sites within 2km of the site, details of which are provided in Table 2 below. The presence of non-statutory designated sites within 2km of the site cannot be ascertained without biological records data.

Table: Statutory designated sites within 2km radius of the site

Designated site name	Distance from site (approx.)	Reasons for notification from Natural England
Surrey Hills - Area of Outstanding natural Beauty (AONB)	370m northeast	This AONB contains deciduous woodlands, stretches of chalk grassland and unimproved <u>heath</u> . These habitats have considerable ecological importance.
Mole Gap to Reigate Escarpment - Site of Special Scientific	630m northeast	This site contains woodland, chalk grassland, chalk scrub and heathland form an interrelated mosaic which supports a wide diversity of characteristic plants and animals, of which many are local or rare.
Interest (SSSI) and Special Area of Conservation (SAC)		The site is designated <u>due</u> the presence of Annex II species such as great crested newts (GCN) and Bechstein's bats. The site also contains Annex I habitats such as stable box scrub, semi-natural dry grasslands and scrublands on calcareous soils which are orchid rich and yew woodlands.
Hackburst and White Downs - Site of Special Scientific Interest (SSSI)	1700m west	This site includes part of the North Downs escarpment west of Dorking. Most of the site is on the steeply sloping Upper and Middle chalk but some small areas overlying the <u>Netley</u> Heath Beds of the Clay-with-Flints plateau are included. The chalk slopes are mostly south- <u>facing</u> and they are covered by a mosaic of grassland, scrub and secondary woodland habitats.
Ranmore Common - Site of Special Scientific Interest (SSSI)	1700m northwest	This site is a large and continuous block of woodland situated mainly on plateau deposits on the crest of the North Downs. Some of the woodland (notably <u>Bagden</u> Wood and Dorking Wood) <u>is</u> ancient, but the remainder <u>is</u> secondary woodland which has developed over former heathland or rough pasture (some of which <u>survives</u> in the more open areas). The site supports a diverse community of breeding birds.

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		16 of 20



Map showing ecology features on site currently & proposed habitat

Appendix 3: Habitat Survey Plan



Appendix 2: Proposed habitat map of the site (based on current plans)



Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		17 of 20



Fauna - an assessment of the suitability of the site for protected or notable species is provided in Table below.

Table: Assessment of the suitability of the site for protected or notable species

Species	Assessment of suitability	Biological records data
Amphibians	There is no suitable terrestrial or aquatic habitat for amphibians on site. A review of aerial imagery and MAGIC maps indicates the presence of three ponds within 500m of the site. One of these is situated on the other side of London Road A24, which is a major obstacle to dispersal. The other two ponds are on the other side of a train track, but train lines are not always a barrier to commuting great crested newts. However, the train station consists of high brick walls, which would stop amphibians commuting from the ponds to the site. Pipp Brook, which runs to the east of the site, is not suitable for amphibians due to the flow of water.	No EPSLs records were identified within 2km of the site. No biological records data obtained
	Given that the site is enclosed by residential roads, train station and hard-standing residential dwellings, the presence of amphibians, in particular great crested newts, is acceptably low.	
	The grassland within the site is sub-optimal for reptiles due to the frequent management and short sward height. Furthermore, the small area of grassland is isolated from other areas of suitable reptile habitat.	No EPSLs records were identified within 2km of the site. No biological records data obtained
Reptiles	Although the developed, sealed surface of the car parks could provide basking opportunities for common <u>reptiles</u> species, the lack of suitable commuting habitat and shelter from predators decreases the likelihood of reptile presence in this area.	
	The presence of reptiles is acceptably low.	
		There are four granted EPSLs within 2km of the site (2015-8485-EPS-MIT, EPSM2013-5704, EPSM2009-637, EPSM2009-1335 and 2017-29070-EPS-MIT), with the closest being 1.2km northwest.
Bats	The grassland provides limited suitable foraging habitat for bats, but given the small size of the site, it is unlikely to support any significant bat populations.	These show the presence of Brown long-eared, Whiskered, Brandts, Soprano pipistrelle and Common pipistrelle in the local area.
		No biological records data obtained

	There is no suitable sett creation habitat. The grassland area provides limited	No biological records data obtained
	foraging habitat for <u>badgers</u> , however this area is very small and surrounded by a	No biological records data obtained
Badgers	residential road and car park. Furthermore, the grassland is not connected to any	
2208212	other suitable foraging or commuting habitat for badgers. Therefore, the presence	
	of badgers is acceptably low.	
	There is no suitable habitat for hazel dormice on the site.	No EPSLs records were identified within 2km of the site.
Hazel Dormouse		
	The presence of <u>hazel dormice</u> is acceptably low.	No biological records data obtained.
	The grassland provides limited foraging habitat for hedgehogs. However,	No biological records data obtained.
	hedgehogs would have to commute through unsuitable, hard-standing residential	
Hedgehog	areas to gain access <u>into</u> the site.	
	The presence of hedgehogs is acceptably low.	
Otter and Water	There are no suitable watercourses or riparian habitat on, or connected to, the	No EPSLs records were identified within 2km of the site.
Vole	site that could support otter or water vole. These species can be discounted from	
VOIC	site.	No biological records data obtained.
	There is limited suitable habitat for birds within the site. The trees, hedgerows and	No biological records data obtained.
Birds	parts of Regents House (B5) may support low numbers of common garden bird	
	species.	
Invertebrates	The grassland and trees are suitable for common generalist invertebrates.	No biological records data obtained.

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		18 of 20



Table below presents an evaluation of the ecological value of the site and also details any ecological constraints identified in relation to the proposed development which will comprise the demolition of existing office and residential buildings and redevelopment to provide two new buildings comprising residential accommodation and a commercial unit.

Table: Evaluation of the site and any ecological constraints

Feature	Survey Results Summary	Impact Assessment	Recommendations	Biodiversity Enhancement Opportunities ¹
Designated sites	There are five statutory designated sites within 2km of the site, the closest of which is Surrey Hills - Area of Outstanding natural Beauty (AONB) which is 370 northeast of the site.	No direct impacts to any designated sites will occur as a result of the proposed development. However, indirect impacts such as pollution and tree damage could occur on the near by statutory designated areas.	A Construction Environmental Management Plan (CEMP) will be required, outlining best practice measures to minimise the possibility of pollution and tree damage during construction.	None.
Habitats and flora	There are no notable habitats within the site. The site is predominately comprised of developed, sealed surface, modified grassland and buildings.	No impacts to any notable habitats are anticipated as a result of the proposed development.	Biodiversity Net Gain: A biodiversity net gain (BNG) metric was undertaken for the site. This takes the baseline to be the site as it was before the recent development occurred, with the aim to compensate for the loss to at least a net gain, but preferably to a 10% net gain. Although the initial plans presented a net loss, a scenario was created which led to a net gain was presented in the BNG metric report: Compensation Example Scenario A With the same tree retentions, plant 29 small native trees moderate condition, as well as 0.1ha of extensive green roof types on the new buildings. This will lead to a 10.71% project net gain	Further habitat creation and enhancement opportunities could be incorporated into the proposed development • Planting of native hedgerow with woody species such as hawthorn, blackthorn and beech • Create area of grassland with wildflowers

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		19 of 20



Amphibians	There is no suitable terrestrial or aquatic habitat for amphibians on site. Despite the presence of three ponds within 500m of the site, amphibian dispersal from these ponds to the site is inhibited by a main road and a walled train station. Therefore, presence of amphibians, including great crested newts, is acceptably low.	The proposed development is not likely to have any impact on amphibians.	In the unlikely event that great crested newts are discovered on site, <u>works</u> should pause and <u>an ecologists</u> should be contacted for further <u>advise</u> . If any common amphibians are found in the working area, these should be encouraged to disperse of their own accord or, if at immediate risk, should be moved by hand to a sheltered, vegetated area away from disturbance.	None.
Reptiles	The site is enclosed by residential road and buildings and not connected to any suitable reptile habitat. Furthermore, the grassland within the site is frequently mown and so suboptimal for reptiles. Therefore, the presence of reptiles is acceptably low.	The proposed development is not likely to have any impact on reptiles.	In the unlikely event <u>that</u> common reptiles are found in the working area, these should be encouraged to disperse of their own accord or, if at immediate risk, should be moved by hand to a sheltered, vegetated area away from disturbance.	None.
Roosting bats	Six of the seven buildings have low bat roosting potential (Arbtech PEA, 2022). However, no roosting bats were observed during bat emergence survey in August 2023 (Arbtech BERS, 2023).	Bats are very unlikely to be roosting within the site, and as such, there are not anticipated to be any impacts on roosting bats as a result of the proposed development.	In the unlikely event that a bat or evidence of bats is discovered during the development all work must <u>stop</u> and a bat licensed ecologist contacted for further advice.	None.
Foraging and commuting bat	The grassland provides limited suitable foraging habitat for bats. However, due to the size of this area and the lack of connectivity to other suitable habitat, this is considered to be suboptimal. The hedgerow could provide suitable commuting and foraging habitat for bats, however due to the small size, it is unlikely to be significant to local bat populations.	No significant impacts are anticipated on foraging or commuting bats as a result of the proposed development.	None.	The following habitat creation and enhancement opportunities could be incorporated into the proposed development: • Creation of a wildlife pond
Badger	The presence of badgers is acceptably low due to the small size and isolation of the grassland.	The proposed development is not likely to have any impact on badgers.	None.	None.
Hazel dormouse	There is no suitable habitat for hazel dormice within the site. Therefore, the presence of hazel dormice is acceptably low.	The proposed development is not likely to have any impact on <u>hazel dormice</u> .	None.	None.
Hedgehog	The grassland provides limited foraging habitat for hedgehogs. However, hedgehogs would have to commute through unsuitable, hard-standing residential areas to gain access into the site. The presence of hedgehog is acceptably low.	The proposed development is not likely to have any impact on hedgehogs.	Any excavations are to be covered overnight, or left with a means of egress to ensure no hedgehogs are trapped. Works to be carried out during daylight hours, when hedgehogs are less likely to be active.	The following habitat creation and enhancement opportunities could be incorporated into the proposed development: • Installation of 13cm X 13cm gaps at the bottom of boundary fencing to enable hedgehogs to move freely through the site.
Otter and Water Vole	Otter and water vole are considered to be absent from the site.		None.	None.

Version No.	Version Date	Filing Ref.	Document Ref.	Page
1	06/06/2025	Н		20 of 20