Persimmon | Health, Safety & Environment Department

Construction Environmental Site Inspection Helpcard

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Together, we make your home

Contents

For scoring developments / phases which started pre-2023, please refer to page 73 of the Helpcard Booklet. KPI's which are not relevant are marked with an Asterix *.

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Scoring criteria

4 SCORE

GROUP HS&E POLICY HAS BEEN FULLY MET

Meets the requirements of the Environmental Management System (EMS), Policy and legal requirements

3 SCORE

MINOR NON-CONFORMITY WITH GROUP HS&E POLICY AND LIMITED IMPROVEMENT NEEDED

- Improvement needed to meet compliance and/or,
- Issue identified that could lead to minor non-compliance
- Suggestion as an opportunity for improvement to be more efficient or adopt best practice

1 SCORE

NON-CONFORMITY WITH GROUP HS&E POLICY AND WITH IMMEDIATE IMPROVEMENT NEEDED:

- Evidence of a minor environmental incident, and/or
- Evidence of risk of minor environmental incident

0 SCORE

MAJOR NON-CONFORMITY WITH GROUP HS&E POLICY AND IMMEDIATE IMPROVEMENT NEEDED:

- Significant departure from Group HS&E policy and EMS
- Evidence of a significant or major environmental incident having occurred
- Evidence of a risk of imminent significant or major environmental incident

RECORD

- For 4 scores any examples of good practice, where applicable
- For 3, 1 and 0 scores the reason for the score with evidence
- Any tasks with deadline for completion, if no deadline entered an automatic 7 days will be set

If a 0 score issued the applicable work activity must be stopped until it has been made safe. This helpcard must be read in conjunction with the Group Performance Monitoring Standards.

KPI 1

Environmental Management System

KPI 1.1 Environmental Management System: Aspects & Impacts Assessment

What To Look For?

- ✓ Check that the Aspect & Impact Assessment (A&I) has been completed and a copy is held on site. Review content e.g. check it is site specific
- ✓ Check it includes relevant activities and risks and includes controls which are to be implemented e.g. concrete washout, road sweeper waste etc.
- ✓ Check that it has been reviewed within last 3 months

4 Score

Good practice would include:

- A&I assessment is completed and up to date (reviewed within last 3 months)
- All relevant risks identified and recorded e.g. tree protection, ecology, protected species, watercourses, relevant surveys etc.

3 Score

- Update or minor amendment needed

1 Score

- A&I assessment partially complete or not aligned with current work activities
- Review(s) not done or inaccurate

0 Score

- A&I assessment not completed
- A&I assessment not relevant to specific project

KPI 1.2 Environmental Management System: Communication & Training

What To Look For?

- ✓ Have the site personnel had sufficient environmental awareness training?
- ✓ Project Environmental Plan, Section 5.2 – have TBT's relevant to project risk been delivered (monthly TBT's are required)?
- ✓ Are records kept of training received?
- ✓ Does the site specific induction address relevant environmental concerns, relevant to project phase
- ✓ Are Environmental Posters on display, relevant to project risk e.g. pumping water, nesting birds etc.

4 Score

Good practice would include:

- Site management team have received relevant Environmental Awareness Training e.g. SEATS or equivalent
- Relevant TBTs have been delivered
- Training records maintained and available
- Site specific induction includes environmental concerns e.g. refuelling, concrete washout, waste management, ecology etc.
- Posters relevant to project risk(s) on display

3 Score

- TBTs behind programme / not completed
- No Environmental Posters on display

1 Score

- Site specific induction does not include environmental concerns
- TBTs not identified in PEP or not relevant to project / risks
- Insufficient TBTs delivered

0 Score

- Site management have received no SEATS or equivalent training
- Training needs have not been identified, planned and or delivered

KPI 1.3 Environmental Management System: Emergency Planning

What To Look For?

- ✓ Check that a Spill Response Plan (SPR) has been completed and is readily available / on display on the Environmental Noticeboard
- ✓ Check that individuals have completed Spill Response Training (to be completed every 3 years)
- ✓ Check that the SRP is included in the Site Induction and that the Environmental Incidents Toolbox talk has been delivered (within last 12 months)
- ✓ Check relevant documents are communicated / displayed e.g. site drainage plan, Emergency Response Poster etc.

4 Score

Good practice would include:

- Observation & Incident Response Flowchart is on display on Environmental Noticeboard
- Site team have completed Spill Response training
- Records kept of spill drills etc.
- Site drainage plan is on display on Environmental Noticeboard

3 Score

- Observation & Incident Response Flowchart not displayed
- Site drainage plan not displayed
- SPR not included in Site Induction / Emergency Spill Response Poster not displayed
- Environmental Incidents TBT not delivered (within last 12 months)

1 Score

- Individuals have not completed Spill Response Training
- No Spill Response Plan is in place
- Spill kits provided are insufficient for in the event of an incident i.e. damaged, not replenished following a previous spill

0 Score

- No Spill Response Plan is in place **and** site team have not completed Spill Response Training

KPI 1.4 Environmental Management System: Environmental Noticeboard

What To Look For?

- ✓ Check that the Environmental Noticeboard is on display
- ✓ Is the current Environmental Policy on display?
- ✓ Is a site layout plan / drainage plan displayed etc?

4 Score

Good practice would include:

- Environmental Noticeboard is on display and includes all relevant / required information

3 Score

- Environmental Noticeboard is on display but is missing information e.g. Environmental Policy, site drainage plan etc.
- Environmental Noticeboard is not displayed in a prominent position, as to raise awareness of environmental concerns/issues

1 Score

- No Environmental Noticeboard is provided / on display

0 Score

- Repeated requests to display Environmental Noticeboard have been ignored

KPI 1.5 Environmental Management System: Monitoring / Inspections

What To Look For?

- ✓ Are environmental inspections being carried out? E.g. Weekly Site Managers Checksheet, Silt Control Monitoring Checklist (if applicable)
- ✓ Have inspections been completed thoroughly?
- ✓ Have all actions identified in previous audits and inspections been addressed / closed-out?
- ✓ Are any outstanding actions or follow-up needed?

4 Score

Good practice would include:

- Sufficient environmental monitoring is taking place
- Inspections are thorough and pick up actions, which have subsequently been completed
- All actions from previous visits have been closed-out satisfactorily and prevent risk of non-compliance

3 Score

- Inspections not completed each week or minor aspects overlooked

1 Score

- Significant gaps or discrepancy in inspections
- Action(s) from previous visit(s) not closed-out

0 Score

- Major discrepancy in checks or no weekly checks completed
- Repeated in-action or non-compliance

KPI 1.6 Environmental Management System: Observations & Incidents

What To Look For?

- ✓ Have the site team had any environmental incidents such as spillages or discharges? Has it been recorded on EMS-FOR-007?
- ✓ Has the site had any regulator contacts? Has it been recorded on EMS-FOR-006?
- ✓ Have any observations been recorded?
- ✓ Have relevant actions been taken to ensure incident does not occur again, including training of relevant site team / subcontractors etc?
- ✓ Are there any incidents which require review / closeout?

4 Score

Good practice would include:

- Incidents and observations are being recorded (on EMS-FOR-007)
- All incidents and observations have been resolved

3 Score

- An event / incident occurred that was not reported in a timely fashion to GHSEA

1 Score

- An event / incident has occurred but not reported on EMS-FOR-007 and to GHSEA, and or insufficient action taken
- Several minor events / incidents have occurred but have not been reported

0 Score

- Significant event / incident disregarded and or not recorded
- Significant event / incident not reported to relevant people (including GHSEA)

KPI 1.7 Environmental Management System: Project Environmental Plan

What To Look For?

- ✓ Project Environmental Plan (PEP) – is it in place with a copy held on site?
- ✓ Is it site specific and addresses / highlights relevant project risks?
- ✓ Has it been signed off by ALL relevant parties e.g. TD, CD & GHSEA?
- ✓ Has it been reviewed within the last 3 months?

4 Score

Good practice would include:

- PEP is in place with a copy held on site and;
- PEP is project specific, with all sections completed and up to date (with required sign-off) and;
- Relevant information in respect of environmental surveys etc. readily available

3 Score

- Content missing or PEP incomplete
- Minor update required
- No review within required timescale

1 Score

- PEP unfit for purpose / missing key information e.g. relevant ecological information, licences etc.
- Duty of Care Schedule (section 7.3) not completed or not up to date

0 Score

- No PEP in place
- PEP is not project specific

KPI 1.8 Environmental Management System: RAMS

What To Look For?

- ✓ Check RAMS are in place for relevant trade(s) and address relevant environmental risk(s)
- ✓ High risk – prioritise sub-contractors such as groundworkers, piling contractors, arboriculturist, as these pose the highest environmental risk
- ✓ Low risk – carpenters, painters / decorators

4 Score

Good practice would include:

- RAMS address all relevant environmental risks posed by activity and the aspects they can impact upon – as highlighted in A&I assessment (and as detailed in Project Environmental Plan).
- RAMS include adequate mitigation / controls to reduce risk posed.
- E.g. Groundworkers - RAMS address fuel storage, COSHH, concrete washout, drain protection, ecological risks, silt run-off, nuisance, waste management, soil stockpiling, (if no Soil Management Plan in place) etc.
- E.g. Piling contractor – RAMS address nuisance, fuel storage, COSHH, concrete washout, ground contamination, waste management etc.

3 Score

- RAMS do not address all relevant activities to be undertaken, and controls required
- Content missing or incomplete
- Minor update required

1 Score

- RAMS unfit for purpose / missing key information
- Work activity not identified / controls / mitigation not identified

0 Score

- No RAMS provided / in place
- RAMS are not project specific and relevant to environmental aspects likely to be impacted upon

KPI 2

Archaeology & Heritage

KPI 2.1 Archaeology & Heritage: Archaeology & Heritage

What To Look For?

- ✓ Check any relevant surveys and or requirements, if required
- ✓ What are the outcomes? Is there a clear action plan within the PEP?
- ✓ Is a copy of the report available on site?
- ✓ Have mitigation actions been undertaken?

4 Score

Good practice would include:

- Site induction training covers relevant Archaeology & Heritage risks
- Tool Box Talk and training records that deal with any protected assets on site
- RAMS address relevant risks
- Scheduled Monument Consent (SMC) is in place for works, where required
- Listed Building Consent is in place for works, where required
- Archaeology & heritage assets are adequately protected e.g. ruins, listed building etc.
- Exclusion zone is in place, where required
- Fencing and signage is in place, where required
- Sub-contractors aware of any protected assets on site
- Checks are included on Weekly Site Managers Checksheet (HMS-FOR-014)

3 Score

- Protection measures require improvement to prevent risk of damage
- Site induction does not include relevant Archaeology & Heritage risks
- No evidence of TBTs covering relevant archaeological risks etc.

KPI 2.1 Archaeology & Heritage: Archaeology & Heritage

1 Score

- RAMS do not identify activities and controls, which may impact upon Archaeology & Heritage
- Protection measures have failed, with disturbance evident e.g. fencing moved
- Failure to identify and record failings in protection measures as part of daily / weekly checks

0 Score

- Damage and or movement of protected asset / heritage feature
- Failure to obtain SMC / listed building consent, where required
- Breach of SMC / listed building consent
- Failure to adhere to any planning requirements in respect of archaeological controls e.g. Written Scheme of Investigation

KPI 3

Ecology & Biodiversity

KPI 3.1 Ecology & Biodiversity: Assessments / Surveys

What To Look For?

- ✓ Has an ecological survey been carried out prior to works starting?
- ✓ What are the outcomes? Is there a clear action plan within the PEP?
- ✓ Is a copy of the survey report(s) available on site?
- ✓ Have mitigation actions been undertaken?
- ✓ Are wildlife licences in place – copies to be held on site
- ✓ Habitat retention – are retained habitats being protected?

4 Score

Good practice would include:

- Relevant ecological surveys completed e.g. bats, birds, invasive species etc. – with relevant risks listed in PEP
- Assessment(s) identifies any specific protected species (including bats, badgers, nesting birds, reptiles, amphibians etc.) - with information listed in PEP
- Tree surveys completed / Tree Protection Plan in place and copy held on site
- Retained habitats are communicated and protected

3 Score

- Copy of relevant surveys not held on site / available e.g. badger survey, tree protection plan etc.
- Surveys completed but further survey work required / not completed

KPI 3.1 Ecology & Biodiversity: Assessments / Surveys

1 Score

- Failure to appoint a Suitably Qualified Ecologist / Ecological Clerk of Works, where required

0 Score

- Failure to adhere to survey requirements e.g. may relate to pre-start or on-site mitigation, such as trapping and translocation, and / or exclusion fencing.
- Failure to have all required relevant surveys completed e.g. Bat / Badger survey etc. E.g. sometimes a Preliminary Assessment will require (species) specific surveys to be completed e.g. undertaking dusk emergence and dawn re-entry surveys of trees for potential bats etc.
- Nesting bird survey not completed prior to the removal of hedgerow / trees, during bird nesting season (Mar-Aug/Sep)

KPI 3.2 Ecology & Biodiversity: Ecological Controls / Protection

What To Look For?

- ✓ Are retained habitats protected with signage in place?
- ✓ Check that the protection in place is suitable and adequate to prevent damage to habitats
- ✓ Check that any protection measures are well maintained and are working effectively e.g. newt fencing etc.
- ✓ Are relevant risks/protected species/areas covered in the induction?

4 Score

Good practice would include:

- Signage and fencing is in place to protect relevant species
- Newt protection fencing is in place and undamaged
- Exclusion zones are established, where required e.g. badger setts, nesting birds etc.
- Subcontractors aware of ecological risks
- Site induction training covers ecological risks / controls / protection measures on site
- Checks are included on Weekly Site Managers Checksheet (HMS-FOR-014)
- Tool Box Talks are taking place relevant to project risks
- Posters relevant to project risks are on display e.g. nesting birds, great crested newts etc.
- EPS licences are in place e.g. if dealing with badgers, bats, dormice etc.

3 Score

- Evidence of small scale damage to newt protection fencing e.g. repairs needed
- Evidence of damaged fencing / signage protecting and or highlighting the presence of a protected species
- Inadequate tree protection fencing in place, or exclusion zone not extending up to edge of tree canopy – but no sign of damage
- Tool Box Talks have not taken place / records insufficient
- Posters relevant to project risks are not on display
- Checks are not included on Weekly Site Managers Checksheet (HMS-FOR-014)

KPI 3.2 Ecology & Biodiversity: Ecological Controls / Protection Continued

1 Score

- Significant damage to newt fencing, requiring immediate repair
- Poor protection / evidence of damage to trees / compaction of soils in root protection areas
- Materials stored within RPZ (root protection zone) which are likely to compact soils
- Failure to identify INNS (Invasive Non-Native Species) and segregate work area(s) – but no sign of cross-contamination / spread
- Ongoing failure to deliver relevant Tool Box Talks relevant to project risks

0 Score

- Damage to tree canopy, tree branches, roots of protected tree / hedge etc
- Breach of TPO (Tree Preservation Order) or TPP (Tree Protection Plan)
- Damage or disturbance to nesting birds
- Evidence of spread of INNS (Invasive Non-Native Species)
- Failure to obtain relevant licence to fell / trim protected tree and or hedgerow
- Damage to retained habitats

KPI 3.3 Ecology & Biodiversity: Ecological Enhancements

What To Look For?

- ✓ Are retained habitats protected as required?
- ✓ Have enhancements been installed as per design?
- ✓ If offsite enhancements are taking place, check where and when

4 Score

Good practice would include:

- Biodiversity Net Gain (BNG) enhancements installed as per planning requirement(s)
- Retained habitats protected in line with BNG requirements
- Temporary ecological enhancements installed by site team e.g. planters, bug hotel etc.

3 Score

- BNG requirements outstanding
- Identified an opportunity to improve biodiversity on site (temporary or permanent)

1 Score

- BNG enhancements not installed as per design (agreed at planning stage)
- External wildlife boxes not installed correctly
- Internal wildlife boxes installed incorrectly

0 Score

- Installed wildlife habitat damaged

KPI 3.4 Ecology & Biodiversity: Invasive Species

What To Look For?

- ✓ Have INNS been identified on site?
- ✓ If so, are adequate measures in place to protect/prevent access to these areas to avoid spread e.g. fencing and signage?
- ✓ Are the risks communicated to the workforce through TBTs?
- ✓ Are the site implementing adequate bio-controls to prevent spread e.g. boot washing etc.?
- ✓ If burying JKW on site, is this in accordance with regulatory requirements?

4 Score

Good practice would include:

- INNS (Invasive Non-Native Species) have been identified through relevant surveys
- Japanese Knotweed (JKW) Management Plan is in place, where JKW is present
- Permission is in place from the Regulator if using any herbicide near water
- Suitably qualified individuals holding the necessary National Proficiency Test Council certificates have been appointed (if using professional herbicide products).
- Exclusion zones are established with signage in place to restrict access
- Contaminated soils are stored on an impermeable surface e.g. liner as to avoid cross contamination with clean soils
- Adequate bio-controls are in place to prevent spread e.g. boot washing, vehicle washing etc.
- Tool Box Talks are taking place relevant to project risks e.g. Japanese Knotweed, Himalayan Balsam etc.
- Posters relevant to project risks are on display e.g. Japanese Knotweed, Himalayan Balsam etc.
- Checks are included on Weekly Site Managers Checksheet (HMS-FOR-014)

KPI 3.4 Ecology & Biodiversity: Invasive Species

3 Score

- Evidence of small scale damage to exclusion fencing e.g. repairs needed
- Evidence of damaged fencing / signage protecting and or highlighting the presence of INNS
- Tool Box Talks have not taken place / records insufficient
- Posters relevant to project risks are not on display

1 Score

- Inadequate survey work completed / INNS not identified
- Improvement to bio-controls required
- Use of unlicensed Contractor to spray / eradicate
- Significant damage to exclusion fencing, requiring immediate repair
- Failure to identify INNS (Invasive Non-Native Species) and segregate work area(s) – but no sign of cross-contamination / spread
- Ongoing failure to deliver relevant Tool Box Talks relevant to project risks

0 Score

- Evidence of cross contamination and or spread of INNS (Invasive Non-Native Species)
- No bio-controls in place
- If burying JKW on site (England & Wales) – failure to tell the Regulator 7 days prior to burying
- In Scotland, if burying prior to any treatment (note -one application of non-persistent herbicide is required before JKW can be buried)
- Failure to adhere to rules in respect of burying JKW on-site e.g. buried too shallow or too close to site boundary
- Contaminated soils removed from site to unpermitted waste facility

KPI 3.5 Ecology & Biodiversity: Protected Species / Plants

What To Look For?

- ✓ Check if any protected species/plants are present on site
- ✓ Check relevant licences are in place and available on site
- ✓ Check that site is compliant with relevant licence conditions
- ✓ Are risks being communicated through inductions/posters/TBTs?

4 Score

Good practice would include:

- Protected Species have been identified through relevant surveys and;
- Relevant EPS licences are in place where required
- Suitably Qualified Ecologist / Clerk of Works have been appointed to oversee works
- Exclusion zones are established with signage in place to restrict access / disturbance to wildlife
- Tool Box Talks are taking place relevant to project risks e.g. Badgers, Dormice etc.
- Posters relevant to project risks are on display e.g. Badgers, Dormice etc.
- Discharging of relevant EPS conditions is taking place on time (as specified by licence)
- Checks are included on Weekly Site Managers Checksheet (HMS-FOR-014)

KPI 3.5 Ecology & Biodiversity: Protected Species / Plants

3 Score

- Evidence of small scale damage to exclusion fencing e.g. repairs needed
- Evidence of damaged fencing / signage protecting and or highlighting the presence of protected species
- Tool Box Talks have not taken place / records insufficient
- Posters relevant to project risks are not on display

1 Score

- Inadequate survey work completed / protected species not identified
- Further survey work required to comply with EPS licence (where in place)
- Significant damage to exclusion fencing, requiring immediate repair
- Failure to identify protected species and segregate work area(s) – but no sign of damage / disturbance
- Ongoing failure to deliver relevant Tool Box Talks relevant to project risks

0 Score

- EPS licence not in place (where required)
- Failure to comply with EPS licence condition(s) (where in place) e.g. not discharged on time as set out by licence
- Evidence of damage / disturbance to protected species e.g. nesting birds, badger sett, bat roost etc.

KPI 3.6 Ecology & Biodiversity: Trees And Hedgerows

What To Look For?

- ✓ Are any trees on site being adequately protected during the works?
- ✓ Are site staff aware of those covered by any TPP and or TPOs? Is this communicated?
- ✓ Are any materials being stored within root protection areas / zones?
- ✓ Are there trees on site not included in final landscape plans that could be removed early to avoid risk of nesting birds, avoid project delay

4 Score

Good practice would include:

- Relevant surveys have been completed and;
- TPOs identified and Tree Protection Plan (TPP) held in PEP and readily available
- Tree / hedgerow protection installed which complies with BS5837:2012 e.g. immovable and extending to edge of tree canopy
- Tree protection signage in place
- Tool Box Talks are taking place relevant to project risks e.g. tree protection requirements
- Checks are included on Weekly Site Managers Checksheet (HMS-FOR-014)

3 Score

- Improvement required to tree protection e.g. fencing damaged / panel removed but no sign of damage
- Evidence of small scale damage to exclusion fencing e.g. repairs needed
- Tool Box Talks have not taken place / records insufficient

KPI 3.6 Ecology & Biodiversity: Trees And Hedgerows continued

1 Score

- Materials stored within Root Protection Area (RPA)
- Significant damage to exclusion fencing, requiring immediate repair
- Failure to protect retained trees/hedgerows – but no sign of damage e.g. roots, branches, trunk
- Ongoing failure to deliver relevant Tool Box Talks relevant to project risks

0 Score

- Materials stored within Root Protection Area (RPA) which have visibly caused or are likely to cause compaction of soil e.g. bricks / blocks (heavy materials)
- Protected tree(s) / hedgerow(s) have been damaged e.g. roots, branches, trunk
- Protected tree(s) / hedgerow(s) have been removed e.g. if TPO in place or if identified in TPP to be retained

KPI 4

Emissions to Land & Air

KPI 4.1 Emissions To Land & Air: Communications

What To Look For?

- ✓ Is the site liaising with the local community to inform them of the progress of works which may affect them?
- ✓ Are newsletters being circulated and public meetings/site visits being held?
- ✓ Has site received any complaints? If so have these been recorded on EMS-FOR-007-Environmental Incident Report?

4 Score

Good practice would include:

- Proactive engagement with local community e.g. letter drop has been carried out with nearby residents informing them of upcoming works
- Contact details shared / displayed to local community e.g. Site Manager and plc.safetyconcerns@persimmonhomes.com

3 Score

- Engagement with local community made but inadequate contact details shared to allow for reporting of concerns directly to Persimmon (see above)

1 Score

- Upcoming noisy works, or ongoing works, likely to cause a nuisance but no communication informing residents /local community of details

0 Score

- No liaison / communications with the local community
- Complaints received from members of the public but not recorded on EMS-FOR-007-Environmental Incident Report and/or communicated to GHSEA
- Complaints received from members of the public and no action taken e.g. no engagement / communication to improve relations / inform of works and actions taken by site to reduce potential impact(s)

KPI 4.2 Emissions To Land & Air: Dust

What To Look For?

- ✓ Is the site dusty? Are vehicle movements giving rise to excessive amounts of dust from the site roadways? Are measures in place on site to control the amount of dust?
- ✓ Are stockpiles located away from boundary, compacted and no higher than 4m? Are they seeded or dampened down where necessary?
- ✓ Are lorries properly sheeted before leaving site?
- ✓ Is dust monitoring required to be undertaken? Is monitoring completed and recorded on EMS-FOR-008?

4 Score

Good practice would include:

- No visible dust blow-off from site, with adequate controls being implemented e.g. regular cleaning of roads, haul roads, damping down etc.
- Monitoring taking place with actions raised, where necessary

3 Score

- Low levels / localised issue causing dust to become airborne and blow off-site
- Minor improvements required to control dust e.g. damping down haul road, stockpile etc.

1 Score

- No baseline monitoring assessment undertaken / records available
- Significant amount or repeated concerns of dust blowing off-site, without adequate controls in place
- Failure to adhere to controls set out in Construction Environmental Management Plan (CEMP)
- Complaint(s) received from local community in respect of dust blow-off with evidence of poor site controls being implemented

0 Score

- Repeated issues in respect of poor dust suppression controls which are leading / have led to dust leaving site and complaints received
- Contaminated site with evidence of airborne dust leaving site
- Failure to adhere to controls set out in Construction Environmental Management Plan (CEMP) following Regulator contact (Local Authority)

KPI 4.3 Emissions To Land & Air: Noise / Light / Vibration

What To Look For?

- ✓ Has the site completed any pre-start monitoring / surveys to gather baseline data?
- ✓ Are noise levels controlled by planning conditions? Where noise restrictions apply, are these being complied with?
- ✓ Is noise monitoring required to be undertaken? Is monitoring completed and recorded on EMS-FOR-009?
- ✓ Are noise levels at the site boundary likely to cause nuisance to neighbours?
- ✓ Are noise control measures in place on site?
- ✓ Are vehicles and plant in good working order and have silencers been fitted?
- ✓ Have any surveys been carried out to assess noise levels outside the site? Is noise likely to carry as vibration to local residents? Is Noise/Vibration monitoring needed to meet Section 61 application? If auto-monitors on-site, are these protected and do we have planned preventative/reactive maintenance & calibration records?

4 Score

Good practice would include:

- No issues with effective controls in place
- Monitoring taking place with actions raised, where necessary

3 Score

- Nuisance risk evident from activity with poor controls being implemented
- Low levels noise / vibration observed along site boundary by GHSEA
- Timers on lighting or redirection required to avoid potential nuisance

KPI 4.3 Emissions To Land & Air: Noise / Light / Vibration

1 Score

- No baseline monitoring assessment undertaken / records available
- Failure to action improvements following findings from any monitoring activities highlighting concerns / issues
- Complaint(s) received from local community in respect of nuisance with evidence of poor site controls being implemented
- Significant amount or repeated concerns in respect of nuisance issues, without adequate controls in place
- Failure to adhere to controls set out in Construction Environmental Management Plan (CEMP)

0 Score

- Repeated issues in respect of nuisance which are leading / have led to complaints which could lead to enforcement action
- Failure to adhere to controls set out in Construction Environmental Management Plan (CEMP) following Regulator contact (Local Authority)
- Breach of planning requirements

KPI 4.4 Emissions To Land & Air: Plant Emissions & NRMM

What To Look For?

- ✓ Are there visible signs of poor maintenance and emissions from plant?
- ✓ London only: is all applicable plant compliant with Non-Road Mobile Machinery (NRMM) emissions requirements? Has the plant been logged on the NRMM London website?

4 Score

Good practice would include:

- Plant well maintained with records kept
- Plant meets requirements of NRMM emissions and has been registered
- Compliance to NRMM AQ standards

3 Score

- Plant item not checked or not NRMM compliant or not fully registered
- Gap in plant & vehicular checks, improvement for compliance

1 Score

- Significant NRMM non-compliance on checks, registration or plant use (idling)

0 Score

- Majority of relevant plant not checked or registered

KPI 5

Soil Management

KPI 5.1 Soil Management: Soil Stripping / Stockpiling

What To Look For?

- ✓ Is topsoil stripping underway or due to start imminently?
- ✓ What plans does the site have to manage/stockpile/protect soil(s)
- ✓ Check for stockpile heights / locations
- ✓ Are soils segregated e.g. hazardous soils (signage must be provided)
- ✓ Does the stockpile have / require a Temporary Works Design

4 Score

Good practice would include:

- Topsoil stockpiles <4m / stored away from ditches / watercourses etc.
- Silt fencing installed at the toe-of-the-bund (bottom) to capture / prevent any silt run-off (particularly important on slopes)
- Good planning visible with areas of vegetation left undisturbed to reduce silt pollution risk
- Soil stripping works planned to occur outside of heavy rain
- Topsoil and sub-soil stored separately
- Soil(s) covered / damped down where necessary, to prevent airborne dust
- Contaminated soil stored separately on an impermeable liner to prevent cross contamination (signage should be provided)
- Stockpile storage time kept to a minimum

3 Score

- Minor cross contamination of topsoil and sub-soil
- Minor compacting of topsoil, where avoidable e.g. plant and machinery tracking over area unnecessarily

KPI 5.1 Soil Management: Soil Stripping / Stockpiling continued

1 Score

- No segregation of topsoil and sub-soil (mixed together)
- Failure to locate stockpiles away from ditches / watercourses
- Failure to protect stockpiles which directly leads to silt run-off / excessive airborne dust visible e.g. no silt protection, not damped down during dry periods etc.
- Excessive compaction of soil caused by plant and machinery, which was avoidable (increases both run-off and flood risk)
- No signage to identify contaminated soil / spoil heaps

0 Score

- Topsoil stockpiles >4m
- Stockpiles stored near to ditches / watercourses etc. which has directly led to silt run-off
- Over-stripping of site leading to an excess of exposed soils thus increased potential for silt run-off / pollution
- Stockpiles kept for an excessive amount of time (thus significantly reducing quality of soil)

KPI 5.2 Soil Management: Reuse Of Soil(s) / MMPs

What To Look For?

- ✓ If soils are being reused, is this being done in accordance with regulatory requirements e.g. topsoil, subsoil, contaminated soil etc.?
- ✓ Is a copy of the MMP held on-site (if MMP in place)?
- ✓ Is the site tracking where soils are being reused (if an MMP in place)?
- ✓ Are soil stockpiles well defined/segregated?

4 Score

Good practice would include:

- England & Wales – clean & naturally occurring material (site-won only) is being reused on site (no MMP required)
- England & Wales – DoWCoP is being followed with a suitable MMP in place (where required e.g. if importing soils or site is contaminated)
- Scotland – soil from a greenfield site is being re-used as per regulatory guidance and declaration submitted to SEPA
- Scotland – contaminated soil is being reused with a Remediation Strategy/Plan in place (agreed via Planning)
- Materials stockpiling and tracking records are maintained and up to date
- Stockpiles are clearly defined / labelled
- Site won topsoil being reused on site of origin
- England & Wales - topsoil imported from soil manufacturer site (must be ≤ 1,000 tonnes)

3 Score

- Minor tracking discrepancies
- Minor increase to the volume of soil reused, as declared in the MMP (MMP will require updating to reflect quants with sign-off from Qualified Person)

KPI 5.2 Soil Management: Reuse Of Soil(s) / MMPs continued

1 Score

- Significant breach of MMP e.g. soils sent off-site to another development for reuse, without our site being declared as a "donor site" on the MMP
- Importing soils from another development site without that site being declared as a "donor site" on our MMP
- Significant increase to the volume of soil reused, as declared in the MMP (MMP will require updating to reflect quants with sign-off from Qualified Person)

0 Score

- England & Wales - failure to apply DoWCoP where required (no MMP in place)
- Scotland – failure to notify SEPA of on-site soil reuse where a Remediation Strategy/Plan is in place
- No permit in place to allow for the on-site treatment of contaminated soils (Mobile Plant / Treatment permit)
- Contaminated soils used without appropriate permissions in place
- England & Wales - topsoil imported from another development site (≤ 1,000 tonnes) without a U1 waste exemption in place
- England & Wales - topsoil imported from soil manufacturer site (where tonnage >1,000 tonnes)
- England & Wales - topsoil imported from another development site (>1,000 tonnes) without an MMP in place

KPI 6

Pollution Prevention

KPI 6.1 Pollution Prevention: Concrete Washout

What To Look For?

- ✓ Check if the site is washing down concrete wagons on-site
- ✓ If so, check that adequate provision has been to made to contain and control wash waters
- ✓ Check that any wash-down activities are taking place away from drains / gullies etc.

4 Score

- Washout has been avoided on site through procurement process (e.g. drivers tasked with taking away from site)
- Washout is contained (e.g. Kelly tank / Siltbuster type system) and is well managed with no evidence of deposits on ground / risk of pollution
- Washout is contained and stored >10m from any drains / ditches / SuDs / watercourse etc.
- Checks are included on Weekly Site Managers Checksheet (HMS-FOR-014)

3 Score

- Evidence of minor spills of concrete washout on ground which are localised and have not entered drains / ditches / SuDs / watercourse etc.

1 Score

- Significant amount of uncontrolled washout e.g. from wagon wash down / mixing areas etc.
- Washout controls sited near drains / ditches / SuDs / watercourse etc. (must be >10m)

0 Score

- No provision has been made to contain and control concrete washout with evidence of concrete washout deposited onto ground
- Evidence of concrete washout entering drains / ditches / SuDs / watercourse etc.

KPI 6.2 Pollution Prevention: Mortar Silos

What To Look For?

- ✓ Check if mortar silos are on site, or if any mixing activities are taking place i.e. mixers, mortar tubs
- ✓ If so, is the silo setup away from drains/gullies etc.
- ✓ If the base clean / free of slurry?
- ✓ Does the base have a low-level structure to prevent slurry / waste run-off?

4 Score

Good practice would include:

- Silos / mixing areas have been setup >10m away from any drain, watercourse, ditch or drainage channel with all mix / slurry contained within working area
- Silo area benefits from a low-level physical structure built around the edge of concrete base to contain liquid / sediment run-off within the working area e.g. breeze block wall
- Checks are included on Weekly Site Managers Checksheet (HMS-FOR-014)

3 Score

- Evidence of minor spills of mortar / slurry on ground which are localised and have not entered drains etc.
- Silo setup requires improvement to prevent pollution occurring
- Mixing station / area requires improvement to prevent pollution occurring

1 Score

- Significant amount of mortar / slurry which is localised but has not entered drains etc.
- Silo or mixing station is setup <10m from drain, watercourse, ditch or drainage channel but no evidence mortar / slurry entering drains etc.

0 Score

- No provision has been made to contain and control mortar / slurry with evidence of deposits on ground which pose a risk of pollution
- Evidence of mortar /slurry entering drains etc.

KPI 6.3 Pollution Prevention: COSHH / Liquid Storage

What To Look For?

- ✓ Are COSHH stores provided?
- ✓ Are liquids provided with adequate secondary containment?
- ✓ Gas bottles (must be locked in cages when not in use)
- ✓ Is COSHH stored away from drains/gullies etc.?
- ✓ Are small containers of fuel stored on an EnviroPad or similar when in use on site?

4 Score

Good practice would include:

- Adblue labelled and provided with secondary containment if stored over open ground e.g. bund
- Small fuel containers stored in container when not in use or on Enviropads / impermeable base when in use on site
- Gas bottles stored in a locked cage
- COSHH store provided with signage and up to date register of materials
- COSHH items stored >10m from drains, gullies etc. and have suitable spill kits for the products being used
- Checks are included on Weekly Site Managers Checksheet (HMS-FOR-014)

3 Score

- Adblue not provided with secondary containment (if stored over open ground) – no sign of spillage observed
- Small fuel containers not stored on Enviropad or impermeable base when in use- no sign of spillage observed
- Gas bottle(s) not locked in cage
- COSHH store missing signage and or register not maintained

KPI 6.3 Pollution Prevention: COSHH / Liquid Storage continued

1 Score

- Adblue not provided with secondary containment (if stored over open ground) and evidence of small spillages on ground
- Small fuel containers not stored on Enviropad or impermeable base when in use with signs of spillages observed
- Multiple gas bottles not locked in cage
- COSHH items stored <10m from drains, gullies etc. and or no suitable spill kits for the products being used

0 Score

- No / poor controls evident for items of COSHH
- Evidence of significant / multiple spillages / miss-management throughout site
- No COSHH register provided

KPI 6.4 Pollution Prevention: Fuel Storage / Refuelling

What To Look For?

- ✓ Check that fuel bowsers are bunded, stored away from drains/gullies etc.
- ✓ Check that an EnviroPad is provided for refuelling activities
- ✓ A spill kit must be within eye-shot of any fuel setup and readily accessible
- ✓ Check for evidence of minor spills on the ground

4 Score

Good practice would include:

- Fuel setup is well contained / controlled e.g. >10m from drains etc., bunded, Enviropad provided and accessible, spill kits accessible and signage provided
- Containers are labelled
- Evidence of Enviropad being used during refuelling (no spills)
- Checks are included on Weekly Site Managers Checksheet (HMS-FOR-014)

3 Score

- Fuel bowser / tank left unlocked / no signage provided
- Bowser / bund filling with fuel
- Minor spills /drips observed
- Failure to use Enviropad when refuelling
- Spill kit insufficient e.g. requires re-stock
- Fuel area setup in an area subject to high volume of traffic (with risk of collision)

1 Score

- Fuel setup within 10m of drain
- Significant spill but contained on-site
- No Enviropad and or spill kit provided / readily accessible

0 Score

- Significant spill or pollution event which has not been contained on-site (with third party involved e.g. clean up contractor, regulator etc.)
- Multiple requests for fuel setup to be moved >10m from drain

KPI 6.5 Pollution Prevention: Housekeeping

What To Look For?

- ✓ Check that a good standard of housekeeping is observed throughout site
- ✓ Check for litter/debris along boundaries etc.

4 Score

Good practice would include:

- Exemplary housekeeping observed throughout site
- Checks are included on Weekly Site Managers Checksheet (HMS-FOR-014)

3 Score

- Area(s) require improvement to housekeeping
- Evidence of littering on site

1 Score

- Significant areas require improvement to housekeeping / poor throughout
- Littering and windblown debris evident off site, at boundaries e.g. roads

0 Score

- Littering and windblown debris evident off site and in or at receptor e.g. rivers or wildlife areas etc.

KPI 6.6 Pollution Prevention: Roads / Highways

What To Look For?

- ✓ Are adequate facilities provided for keeping roads clean? E.g. jetwash, road sweepers etc.
- ✓ Are roads/haul routes free from mud and debris?
- ✓ Is regular scraping of roads taking place?

4 Score

Good practice would include:

- Good controls observed with wheel wash facilities / jet washing provided - no mud and debris on roads / highways
- Regular scraping / sweeping of roads / highway and free from mud and debris
- Checks are included on Weekly Site Managers Checksheet (HMS-FOR-014)

3 Score

- Minor improvement required e.g. roads on-site require clean / scrape to prevent mud and debris tracking off-site and onto highway

1 Score

- Significant deposits of mud and debris on site roads with evidence of this having been tracked off-site and onto highway

0 Score

- Significant deposits of mud and debris on road / highway which could lead to incident
- Insufficient / no provision to contain / control mud and debris and prevent tracking onto the highway

KPI 6.7 Pollution Prevention: Road Sweeper Waste

What To Look For?

- ✓ Check how road sweeper waste is being managed on site
- ✓ If it is taken away, then no issue (just check waste transfer notes for waste removed)
- ✓ If it is deposited on site for treatment check that the setup is adequate to contain and control any sediment/water – in line with EMS guidance

4 Score

Good practice would include:

- Road sweeper waste is being removed from and deposited off-site
- Road sweeper waste being deposited on site is contained within a sealed drainage system (>10m watercourse; ditch or drainage channel; drains / manholes)
- Fork-lift brush sweepings are being managed / stored appropriately
- Checks are included on Weekly Site Managers Checksheet (HMS-FOR-014)

3 Score

- Improvement required to road sweeper waste controls e.g. small amount of liquid / sediment not contained but doesn't pose risk of pollution

1 Score

- Improvement required to road sweeper waste controls e.g. liquid / sediment run-off poses an immediate risk of pollution

0 Score

- Road sweepers are depositing waste which has arisen from off-site (e.g. sweeper tank arrived with residues in tank)
- Poor controls / containment of road sweeper waste with evidence of uncontrolled run-off / silt entering drains etc.
- Road sweeper waste stored <10m from watercourse; ditch or drainage channel; drain / manhole

KPI 6.8 Pollution Prevention: Site Accommodation

What To Look For?

- ✓ Check how cabins waste water pipes are connected
- ✓ Cabins must be connected to the foul network or a septic tank only

4 Score

Good practice would include:

- Site accommodation connected to foul sewer
- Site accommodation connected to septic tank (and subsequently removed from site as waste)

3 Score

- Septic tank in state of poor repair / overfilling – low level impact
- Grey water waste from site cabins is discharging onto ground

1 Score

- Septic tank in state of poor repair / overfilling – significant impact
- No connection to foul sewer or septic tank provided for cabin(s), with effluent deposited onto ground

0 Score

- N/A

KPI 6.9 Pollution Prevention: Spillages

What To Look For?

- ✓ Check for evidence of any spillages throughout site
- ✓ Investigate further if evidence of spillages found – this may need to be recorded as an environmental incident

4 Score

Good practice would include:

- No spills evident and prior events well recorded (if applicable)
- Checks are included on Weekly Site Managers Checksheet (HMS-FOR-014)

3 Score

- Minor spill or drip / poor practice observed
- Previous event not reported

1 Score

- Significant spill or pollution event but contained on site

0 Score

- Significant spill or pollution event but not contained on site, with third party involvement e.g. spill response contractor, regulator contact

KPI 6.10 Pollution Prevention: Vehicle Cleaning / Washing

What To Look For?

✓ Vehicle/cleaning washing is taking place in a controlled manner i.e. run-off is not entering surface water drains

4 Score

Good practice would include:

- Cleaning / washing activities are contained or carried out over a soakaway so water can infiltrate directly into the ground. Must be >10m from drains / watercourse etc.
- Checks are included on Weekly Site Managers Checksheet (HMS-FOR-014)

3 Score

- Evidence of small scale run-off from cleaning / washing operations, but has not entered into drainage system / watercourse etc.
- Small improvement required to contain water / run-off e.g. bund, sleeping policeman etc.

1 Score

- Significant run-off from cleaning / washing operations, but has not entered into drainage system / watercourse etc.
- Small improvement required to controls to contain water / run-off e.g. bund, sleeping policeman etc.

0 Score

- No controls provided for the cleaning / washing of vehicles with evidence of uncontrolled run-off entering drains / leaving site / entering watercourse etc.

KPI 6.11 Pollution Prevention: Other

What To Look For?

✓ Any other activity which may be causing or is likely to cause a pollution incident.

4 Score

Good practice would include:

- Any activity which is not covered above which is clearly well planned / controlled and the activity poses no risk to the environment
- Checks are included on Weekly Site Managers Checksheet (HMS-FOR-014)

3 Score

- Any activity which is not covered above and there are obvious pollution prevention improvements required but no immediate pollution risk

1 Score

- Any activity which is not covered above and there are obvious pollution prevention improvements required to prevent an immediate pollution risk

0 Score

- Any activity which is not covered above and there has been or is an ongoing pollution event occurring

KPI 7

Water Management

KPI 7.1 Water Management: Abstraction

What To Look For?

- ✓ Check if water standpipes are in use on site (by Persimmon or subcontractors)
- ✓ Check that standpipes are licenced i.e. metered
- ✓ Check that operators of standpipes are CALM Network trained
- ✓ If water is being abstracted from a watercourse check that it is being done in accordance with regulator requirements i.e. no more than allowed, monitored etc.

4 Score

Good practice would include:

- England & Wales – metered water standpipe is in use and user of water standpipe is CALM Network trained (within last year)
- England & Wales – abstraction from watercourse is monitored, with no more than 20m3 used per day. If more, licence must be in place
- Scotland – licenced standpipe provided by Scottish Water in use (coloured blue and purple)
- Scotland - abstraction from watercourse is monitored, with no more than 10m3 used per day. If more, licence must be in place

3 Score

- England & Wales – user of water standpipe is not CALM network trained

1 Score

- Project team are not maintaining records of water abstracted, where taking water from watercourse
- Breach of abstraction licence condition e.g. over abstracting

0 Score

- Illegal abstraction of water from network (licenced standpipe not in use)
- Illegal abstraction of water from watercourse (e.g. without a permit in place, where required)

KPI 7.2 Water Management: Dewatering / Discharges

What To Look For?

- ✓ Check that any water discharges are 'clean and uncontaminated' – you may need to inspect any attenuation basins, SuDs that are present on site. It is also worth checking low-lying areas of the site to check for overland run-off of water into ditches/streams etc.
- ✓ If dewatering excavations, is this being managed effectively?
- ✓ Check that the Permit to Pump is being issued where required

4 Score

Good practice would include:

- Permit to Pump' is in place and activity well controlled
- Water discharges are well controlled / managed with visibly clean & uncontaminated water only being discharged
- Dewatering of an excavation is taking place with a sediment sock in use and no risk of pollution observed
- Dewatering of an excavation is taking place over open ground, away from drainage and without risk of over-land run-off

3 Score

- Clean water being pumped / discharged but no 'Permit to Pump' in place e.g. no risk of pollution

1 Score

- Dewatering is taking place but evidence of low-level silt / sediment being discharged
- Dewatering / discharge taking place which does not meet terms of regulatory position statement / exemption
- A minor pollution event has occurred but not been reported

0 Score

- Significant silt / sediment is being discharged which has / is causing a pollution e.g. dirty water pumped straight into storm drainage system and or watercourse
- A breach of exemption / permit / licence e.g. high pH or turbidity (sediment)

KPI 7.3 Water Management: Drainage

What To Look For?

- ✓ Are surface/storm drains adequately protected?
- ✓ Is the drain protection effective, well maintained, inspected etc.?
- ✓ Is the site drainage plan on display on the environmental noticeboard?
- ✓ Is there evidence of any pollutants entering/having entered storm/surface water drains?

4 Score

Good practice would include:

- Storm drains are protected with gulley bags and terram or GulliBlok
- Protection is fitted correctly and maintaining flow of water whilst capturing sediment
- Evidence of inspections being carried out (e.g. ***EMS-FOR-018*** completed and or actions identified, where necessary)
- Site drainage plan is on display

3 Score

- Small improvements required to improve drain protection measures, but no sign of pollution
- Drain protection measures have fell into drain and require reset to maintain performance (no immediate pollution risk etc.)
- Possibility that a polluting substance **may** enter a drain e.g. liquids
- Insufficient checks and or poor-quality records maintained for inspection of drain protection measures

1 Score

- Storm drains not protected adequately, and evidence of small-scale pollution event
- Culvert / drain / ditch requires unblocking to maintain water flow
- No drainage plan available

0 Score

- No evidence of drain protection installed with imminent risk of pollution / ongoing pollution
- Polluting substance has entered in the drainage system with imminent risk of pollution / ongoing pollution e.g. liquids
- Significant failing of drain protection which is leading to silt / sediment discharging from site

KPI 7.4 Water Management: Monitoring

What To Look For?

- ✓ Is regular monitoring of water discharges taking place?
- ✓ Is the correct form being used – EMS-FOR-010?
- ✓ Does the monitoring include everything required i.e. date, weather, turbidity, pH etc.?
- ✓ Are the records readily available for review?
- ✓ Has the monitoring picked up any issues? If so, what steps have been taken to remedy any issue?

4 Score

Good practice would include:

- Sufficient records maintained for monitoring of water quality (in line with permit requirements, if in place) and readily available
- EMS-FOR-010 in use and daily checks completed, where required (note – sites must record even when not discharging water if a permit / licence is in place)

3 Score

- Small improvements required to water quality monitoring e.g. increased frequency of checks etc.
- Monitoring undertaken but improvements required in respect of document control e.g. records should be readily available on site

1 Score

- Significant omissions in water quality monitoring data e.g. numerous days missed, turbidity not tested, pH not tested etc.

0 Score

- No records / evidence of water quality monitoring having taken place, where required

KPI 7.5 Water Management: Permit(s)

What To Look For?

- ✓ Does the site have a permit / licence to discharge water from site?
- ✓ Are discharges being monitored in accordance with permit / licence?
- ✓ Is a copy of the permit / licence held on site and readily available?
- ✓ Is the site compliant with all permit / licence conditions?
- ✓ Are the site team/relevant subcontractors briefed on the requirements of the permit / licence?

4 Score

Good practice would include:

- Permit / licence in place to allow for the discharge of surface water from site, where required
- Copy of permit /licence is held on site in the Surface Water Management Plan folder along with relevant documentation
- Permit(s) / licence(s) are in place to allow for the installation of culvert(s) / diversion of streams, ditches etc. where required
- Permit is in place if working near to a main river / tidal river

3 Score

- Copy of permit / licence is not readily available / accessible on site
- Evidence of a lack of awareness of permit / licence conditions by site team

1 Score

- Failure to comply with a permit / licence condition, but has not (or is not likely to) lead to enforcement action / pollution incident

0 Score

- Permit(s) not in place for an activity where one is required e.g. if working within 8m of a main river, diverting a watercourse etc.
- Failure to comply with a permit / licence condition which is likely to lead to enforcement action / pollution incident

KPI 7.6 Water Management: Silt Management

What To Look For?

- ✓ Is there a Surface Water Management Plan in place?
- ✓ If so, is the site complying with the Plan?
- ✓ Are adequate and effective silt control measures in place throughout the site?
- ✓ Check silt fencing/ v-ditches / bunds / attenuation ponds etc.
- ✓ Is everything performing as it should be? i.e. only clean and uncontaminated water is leaving site

4 Score

Good practice would include:

- Silt controls measures are in good order throughout site with no risk of pollution (note that controls will require ongoing checks to maintain performance)

3 Score

- Improvements required to silt control measures, although no immediate risk of pollution e.g. silt fencing requires attention, attenuation pond inlet /outlet requires de-silting

1 Score

- Improvements required to silt control measures, and immediate risk of pollution e.g. silt capture methods such as matting etc. require replacement to ensure continued performance
- Significant portion of silt controls have failed e.g. collapsed silt fencing, bunds damaged etc.

0 Score

- Improvements required to silt control measures, and evidence of a historic or ongoing pollution event e.g. evidence of silt / sediment in drains, watercourse etc.

KPI 8

Waste Management

KPI 8.1 Waste Management: Environmental Permits / Licences / Exemptions

What To Look For?

- ✓ Have all Duty of Care (DoC) checks been completed for waste carriers?
- ✓ Have all DoC been completed for waste disposal sites?
- ✓ Are PDF print outs of the DoC checks for all waste carriers and disposal sites held in the PEP?
- ✓ Are they listed in the Duty of Care (DoC) Schedule of the PEP?
- ✓ Check waste transfer notes to make sure waste carriers / destinations are listed in DoC Schedule of PEP

4 Score

Good practice would include:

- Duty of Care checks completed for all waste carriers and disposal sites – with PDF print outs held in PEP
- DoC Schedule completed and up to date for all waste carriers / disposal sites

3 Score

- Waste Carriers Licence check missing for one contractor which is subsequently checked and correctly appears on relevant public register
- Missing PDF check for one contractor

1 Score

- A couple of missing waste carriers' licences (from DoC checks) which are subsequently checked and correctly appear on relevant public register
- Multiple checks not completed / no PDFs printed, **and** subsequent checks demonstrate waste carriers / disposal sites are authorised

0 Score

- No information available
- Significant no. of checks not completed / recorded in Duty of Care Schedule
- Waste removed by an unlicenced waste carrier
- Waste removed to a site which is unauthorised to accept that specific waste type(s) e.g. hazardous soil & stone etc.

KPI 8.2 Waste Management: Waste Transfer Notes / HWCN's

What To Look For?

- ✓ Are waste transfer notes available / completed correctly?
- ✓ Check how the site is managing paperwork i.e. are they using the waste documentation folder or are Commercial storing tickets electronically on a shared drive?
- ✓ If stored electronically, check the WTNs are present and correct and stored correctly
- ✓ Are there any missing WTNs for a specific time period? If so, request further information

4 Score

Good practice would include:

- Waste Transfer Notes (WTNs) / Hazardous Waste Consignment Notes (HWCN) (Special Waste in Scotland) completed correctly
- Copies of WTN / HWCNs available and held on site in Waste Documentation folder or readily accessible via shared folder

3 Score

- Minor errors in WTNs / HWCNs
- A few WTNs / HWCNs missing or not readily available

1 Score

- Significant no. of WTNs / HWCNs missing or not readily available
- Significant errors / omissions on completed WTNs / HWCNs and are not legally compliant

0 Score

- No information available e.g. WTNs / HWCNs not provided for waste removed

KPI 8.3 Waste Management: Waste Control & Storage

What To Look For?

- ✓ Is waste stored appropriately i.e. covered skips to prevent windblown litter, where required
- ✓ Is the waste storage area tidy?
- ✓ Is there evidence of windblown litter around the site?
- ✓ Has provision been made for the separate collection of hazardous waste?

4 Score

Good practice would include:

- Skips / containers clearly labelled
- Waste stored securely to prevent windblown litter e.g. light mixed waste covered over, plasterboard covered to prevent rainwater ingress
- Excavation waste well segregated e.g. topsoil and subsoil stored separately
- Sealable / lockable containers provided for the separate collection of hazardous waste(s)

3 Score

- Waste storage area is untidy and requires improvement

1 Score

- Waste storage area not fit for purpose e.g. skips overflowing with waste, waste not contained and stored over open ground
- Evidence of windblown waste / litter escaping from waste containers (but contained on site)

0 Score

- Hazardous waste mixed in with non-hazardous waste
- Evidence of windblown waste / litter escaping beyond the site boundary

KPI 8.4 Waste Management: Segregation

What To Look For?

- ✓ Are skips clearly labelled to help promote segregation and recovery of waste? Is there any missing signage?
- ✓ Is plasterboard / inert waste stored separately from general waste?
- ✓ Have Dulux / AkzoNobel paints tins / containers been separated into appropriate bags (blue – non-hazardous, red – hazardous) pending collection from site?
- ✓ Is there evidence of cross contamination in skips / containers?
- ✓ Has provision been made for the separate collection of hazardous waste?

4 Score

Good practice would include:

- Exemplary approach to waste segregation with ALL waste streams separated, as required e.g. separate collections for canteen waste, hazardous waste, timber etc.
- Skips /containers clearly labelled
- Colour coding system in use

3 Score

- Small improvements required in respect of waste segregation e.g. plasterboard in with general waste
- Sign missing from waste container e.g. skip or bin
- Dulux paint tins / containers not segregated / bagged, as per req's

1 Score

- Multiple signs missing from waste containers (skips, bins etc)
- Evidence of waste not being segregated e.g. only mixed waste skips provided
- Evidence of cross contamination of waste streams e.g. hazardous waste mixed in with non-hazardous waste e.g. paint tins, adhesives etc.

0 Score

- No provision made for the separate collection of hazardous waste
- Significant evidence of cross-contamination of waste streams
- Waste(s) returned from waste management contractor due to cross contamination

KPI 8.5 Waste Management: Recycled Aggregates

What To Look For?

- ✓ Has / is the site importing recycled aggregates for use on site?
- ✓ Are imported materials free from contamination (no more than **>1%** 'Class X' material is allowed i.e. timber, metals, plastics, soils etc)
- ✓ Check it is well-graded and free from over-sized items
- ✓ Is the site storing inert materials pending crushing on site? Check that only inert materials are stockpiled e.g. pile should be free from asphalt, brick-straps etc.
- ✓ If there is a crusher on site, check relevant paperwork is present i.e. mobile plant permit, deployment notification(s), factory production control manual aka method statement of production
- ✓ Are there any materials testing records available? i.e. grading, resistance to fragmentation etc.

4 Score

Good practice would include:

- Imported aggregates are compliant with the Aggregate Quality Protocol (QP) and are visibly free of contamination e.g plastic, metal, wood, soil etc.
- Imported recycled aggregates are supported with a Delivery Note stating compliance with the Aggregate QP
- Recycled aggregates produced on site meet the requirements of the Aggregate QP e.g. graded to relevant specification and visually free from contaminants
- Materials pending crushing are well segregated i.e. no contamination present

3 Score

Imported

- Minor non-conformance with Aggregate QP e.g. isolated contaminated load deposited on site, pending removal
- Delivery notes for imported recycled aggregates do not state compliance with the Aggregate QP
- Testing certificates are out of date however material appears visually compliant

Site-won / crushed

- Slight contamination observed in inert pile, pending crushing on site

KPI 8.5 Waste Management: Recycled Aggregates continued

1 Score

Imported

- Inadequate evidence to demonstrate imported recycled aggregates are compliant with the Aggregate QP e.g. missing paperwork such as copy of permit, factory production control manual, testing certs etc. – **but material appears visually clean.**
- Multiple loads of contaminated material observed on site – however, these have been quarantined and pending removal from site
- No testing certificates provided, or bear no resemblance to imported material e.g. constituent material testing certificate shows 60% masonry present, where material on site contains no masonry type material – but material is not grossly contaminated

Site-won / crushed

- Significant contamination observed in inert pile, pending crushing and reuse on site i.e., asphalt, brick-straps, concrete bags etc.

0 Score

Imported

- Site has imported (and used) recycled aggregates that do not comply with the Aggregate Quality Protocol e.g. evidence of gross contamination present e.g. asphalt, metal, plastic, timber, soils etc.
- Inadequate evidence to demonstrate imported recycled aggregates are compliant with the Aggregate QP e.g. missing paperwork such as copy of permit, factory production control manual, testing certs etc. – **and material is visibly contaminated**.

Site won / crushed

- Site has crushed inappropriate materials through poor segregation practices i.e. evidence of contamination in crush pile such as asphalt, brick-straps, timber etc.
- No mobile plant permit and or deployment notification in place for crusher on site
- No materials testing undertaken for site-won crushed materials

KPI 8.6 Waste Management: Waste Minimisation

What To Look For?

- ✓ Are skips / containers packed efficiently to reduce the volume of waste?
- ✓ Could the site take any steps to reduce waste i.e. provide material off-cuts area for plasterboard, timber etc.?
- ✓ Are subcontractor's managing / storing materials effectively to reduce waste?

4 Score

Good practice would include:

- Site is ensuring skips / bins are being packed as efficiently as possible
- Site has introduced a sub-contractor incentivisation scheme to reduce waste
- Site is reusing waste materials, where possible

3 Score

- Improvement / suggestion to reduce waste

1 Score

- Sub-contractor is producing unnecessary waste through poor practice(s) etc.
- Inadequate materials storage is causing unnecessary waste

0 Score

- N/A

KPI 9

Resources

KPI 9.1 **Resources:** Carbon Minimisation

What To Look For?

- ✓ Are energy efficient cabins / plant in use?
- ✓ Is plant and machinery left idling unnecessarily?
- ✓ Are lights / appliances left on in unoccupied plots?
- ✓ Is the site taking steps to reduce carbon emissions e.g. hybrid generator setup?

4 Score

Good practice would include:

- TBS has been installed, where possible
- Low energy light fittings are in use e.g. LEDs
- Site is using alternative fuels to reduce carbon emissions e.g. HVO fuel as replacement for diesel
- Hybrid plant and or generator(s) in use
- Electric mobile tower lighting unit(s) in use
- PV panels / EV charging points
- Off-site fabrication considered as part of build

3 Score

- Lighting left on in unoccupied / unused areas (to include plots and cabins)
- Over-powered diesel generators in use (lack of planning in respect of power requirements)
- Opportunity identified to reduce carbon emissions whilst undertaking audit inspection

1 Score

- Numerous plant and or equipment observed idling when not in use
- Significant failings observed to reduce carbon emissions, where possible

0 Score

- Numerous or gross failure to plan or implement energy / carbon saving measures to support Persimmon Homes to reduce emissions in line with Environmental Policy

KPI 9.2 Resources: Water Use

What To Look For?

- ✓ Is the site wasting water i.e. not repairing leaks from hoses, leaving hoses on unattended etc.?
- ✓ Is the site taking any positive steps to reduce water usage?

4 Score

Good practice would include:

- Actions taken on site to reduce water usage e.g. rainwater harvesting
- Water supply is metered and targets set to reduce usage

3 Score

- Water leak observed e.g. from cabins, mortar silo etc.

1 Score

- Significant wastage of water observed e.g. ongoing leak which was previously identified but has not been rectified

0 Score

- N/A

KPI 9.3 Resources: Material Storage

What To Look For?

- ✓ Are materials stored appropriately as to avoid unnecessary waste i.e. covered, stored internally where required etc.?
- ✓ Are areas tidy and materials stored securely?
- ✓ Is there evidence of damaged materials owing to poor storage / practices?

4 Score

Good practice would include:

- Materials well stored throughout as to prevent damage e.g. perishable materials stored in containers and or inside plots
- Areas tidy and secure

3 Score

- Insufficient storage provided and or damaged materials observed

1 Score

- Multiple items of materials damaged, owing to poor storage

0 Score

- N/A

KPI 9.4 Resources: Timber (Chain Of Custody)

What To Look For?

- ✓ Is legal and sustainable timber being procured / used?
- ✓ Is timber FSC or PEFC certified? Note- delivery tickets will state this

4 Score

Good practice would include:

- Records available which demonstrate compliance with Timber Chain of Custody (CoC) under FSC / PEFC
- Use of Grown in Britain timber

3 Score

- Further information needed to evidence compliance with CoC requirements

1 Score

- Inadequate evidence to demonstrate timber deliveries are complaint with CoC requirements

0 Score

- Timber delivered and no CoC evidence

Persimmon | Health, Safety & Environment Department

For sites/phases starting Pre-2023

Persimmon
Together, we make your home

Scoring sites which started prior to 2023

This guide has been produced to assist you when undertaking scored Environmental Inspections / Audits on sites which started prior to 2023.

Some KPI's can be ignored, whereas others should be scored as per the Construction Environmental Site Inspection Helpcard.

See below for advice on how to score all the relevant KPIs.

Scoring

Each KPI in this booklet will have either 'Ignore KPI' or 'Score as normal' against it. See below for guidance on how to approach this.

- Ignore KPI - score as 'false' and insert N/A in comments box.
- Score as normal – score as per the Construction Environmental Site Inspection Helpcard

All relevant KPI's should be scored as per the Construction Environmental Site Inspection Helpcard. There may be some nuances where certain documents etc. aren't available, owing to the start date of the development; however, the above guide, alongside this document will provide clarity on how KPI's should be approached.

Keep an eye out for 'Note' boxes as these provide important advice.

KPI 1

Environmental Management System

KPI 1. Environmental Management System

While some of the pre-construction paperwork (Aspect & Impact Assessment and Project Environmental Plan) is not required, it is still important to ensure that:

- ✓ Site personnel have had sufficient environmental awareness training
- ✓ Monthly TBT's relevant to project risk are being delivered
- ✓ Site specific inductions address relevant environmental concerns / risks
- ✓ Environmental Noticeboards / posters / site drainage plans are on display (and up to date)
- ✓ Weekly inspections are being completed and picking up environmental concerns / incidents are being reported / RAMS are relevant to project risks

1.1 Environmental Aspects & Impacts Assessment

Ignore KPI.

1.2 Communication & Training

See note (i) below. Otherwise score as normal.

1.3 Emergency Planning

Score as normal.

1.4 Environmental Noticeboard

Score as normal.

1.5 Monitoring / Inspections

Score as normal.

1.6 Observations & Incidents

Score as normal.

1.7 Project Environment Plan

Ignore KPI.

1.8 RAMS

Score as normal.

Note – sites starting prior to 2023 will not have a Project Environmental Plan or Aspect & Impact Assessment. However, sites must still be communicating relevant risks to subcontractors and ensure relevant environmental risks and controls are identified (through inspections, recording incidents, ensuring RAMS are fit for purpose etc.)

i) Do not score Site Management for not having completed Site Environmental Awareness Training currently. However, encourage Construction team to arrange training.

KPI 2

Archaeology & Heritage

KPI 2. Archaeology & Heritage

All KPI's to be scored as per EMS Standard.

2.1 Archaeology & Heritage

Score as normal.

Note – relevant surveys / assessments will have been completed for planning purposes. Whilst there is no Project Environmental Plan to list all relevant archaeological / heritage constraints, it is important that you / the site team are aware of the findings of these surveys. As such, a copies of relevant surveys / licences etc. should be available / held on site if there are constraints which must be taken into consideration.

Archaeological controls / protection must be in place relevant to the findings of the surveys / assessments completed and in accordance with any Written Scheme of Investigation / planning requirements.

KPI 3

Ecology & Biodiversity

KPI 3. Ecology & Biodiversity

3.1 Assessments / Surveys

Ignore KPI – although request copies of relevant surveys are held on-site.

3.2 Ecological Controls / Protection

Score as normal.

3.3 Ecological Enhancements

Score as normal.

3.4 Invasive Species

Score as normal.

3.5 Protected Species / Plants

Score as normal.

3.6 Trees & Hedgerows

Score as normal.

Note – relevant surveys / assessments will have been completed for planning purposes. Whilst there is no Project Environmental Plan to list all relevant ecological constraints, it is important that you / the site team are aware of the findings of these surveys. As such, a copies of relevant surveys / licences etc. should be held on site.

Ecological controls / protection must be in place relevant to the findings of the surveys / assessments completed e.g. tree protection plans, newt fencing etc.

KPI 4

Emissions to Land & Air

KPI 4. Emissions to Land & Air

All KPI's to be scored as per EMS Standard.

4.1 Communications

Score as normal.

4.2 Dust

Score as normal.

4.3 Noise / Light / Vibration

Score as normal.

4.4 Plant Emissions & NRMM

Note NRMM is only applicable to London.

Score as normal (if applicable)

Note – there is no requirement for sites to have undertaken baseline monitoring, if starting prior to 2023. However, some developments may have to have completed monitoring as part of Planning requirements, so it is important to ask.

Monitoring should be undertaken if issues have been identified by the Local Planning Authority, post start.

KPI 5

Soil Management

KPI 5. Soil Management

All KPI's to be scored as per EMS Standard.

5.1 Soil Stripping / Stockpiling

Score as normal.

5.2 Reuse Of Soil(s) / MMPs

Score as normal.

KPI 6

Pollution Prevention

KPI 6. Pollution Prevention

All KPI's to be scored as per EMS Standard.

6.1 Concrete Washout

Score as normal.

6.2 Mortar Silos

Score as normal.

6.3 COSHH / Liquid Storage

Score as normal.

6.4 Fuel Storage / Refuelling

Score as normal.

6.5 Housekeeping

Score as normal.

6.6 Roads / Highways

Score as normal.

6.7 Road Sweeper Waste

Score as normal.

6.8 Site Accommodation

Score as normal.

6.9 Spillages

Score as normal.

6.10 Vehicle Cleaning / Washing

Score as normal.

6.11 Other

Score as normal.

Note - subcontractor engagement should be a priority to help raise awareness of Persimmon requirements in respect of pollution prevention controls.

KPI 7

Water Management

KPI 7. Water Management

All KPI's to be scored as per EMS Standard.

7.1 Abstraction

Score as normal.

7.2 Dewatering / Discharges

Score as normal.

7.3 Drainage

Score as normal.

7.4 Monitoring

Score as normal.

7.5 Permit(s)

Score as normal.

7.6 Silt Management

Score as normal.

Note – there is no requirement for a sites to have a Surface Water Management Plan (unless it is a planning condition) if starting prior to 2023. However, if issues are identified, project teams should be tasked with appointing suitably competent Consultants to undertake a site visit and produce a subsequent plan. We cannot ignore the need for a SWMP if issues are identified.

KPI 8

Waste Management

KPI 8. Waste Management

All KPI's to be scored as per EMS Standard.

8.1 Environmental Permits / Licences / Exemptions

See note (i) below.

8.2 Waste Transfer Notes / HWCN`s

Score as normal.

8.3 Waste Control & Storage

Score as normal.

8.4 Segregation

See note (ii) below. And provide guidance to encourage sites to segregate all waste streams, where possible.

8.5 Recycled Aggregates

Score as normal.

8.6 Waste Minimisation

Score as normal.

Note

i) details of waste carriers / disposal sites will not be recorded in the PEP. However, sites must still demonstrate they have checked relevant permissions. They can do this by having physical copies of all licences / permits on site or by holding such information electronically.

ii) sites starting prior to 2023 do not need to follow the full requirements to segregate non-hazardous wastes, as per the Waste Management Standard. However, all sites must make provision for the separate collection of hazardous waste (this is a legal requirement). Sites should also be encourage to segregate waste, where possible.

KPI 9

Resources

KPI 9. Resources

All KPI's to be scored as per EMS Standard, with exception of KPI 8.4.

9.1 Carbon Minimisation

Score as normal.

9.2 Water Use

Score as normal.

9.3 Material Storage

Score as normal.

9.4 Timber (Chain Of Custody)

Ignore KPI.

Note – whilst it is a legal requirement to procure legal and sustainable timber this KPI should be ignored, for now.