



2017 Update

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South London Project



Audit Procedure

The process can be divided into the following stages:

• Request for details of Major planning applications from Planning Team. (A Major development site is defined as a residential development of 10 dwellings or more or where the number is not given, 0.5 ha or more; or for all other uses, a floor space 1000 square feet or a site area 1 ha or more.)

Note: Within the Central Activity Zone and Canary Wharf *all* development sites must be listed for NRMM.

- Comparison of details received from Planning and those drawn from the listings on the NRMM website (nrmm.london) and Excel spread sheet drawn up to reflect all known sites.
- Contact made with site managers/sustainability manager, etc. to request audit and to explain rationale behind this.
- Site visit undertaken and audit carried out.
- Follow up correspondence detailing any issues raised during visit sent to site contact, correspondence maintained and second visit undertaken if necessary until compliance is achieved.

Straightforward but.....

If an officer cannot see a type approval plate on an engine during the site audit:

- If there is no manufacturer's paperwork with the plant detailing the EU standard, written evidence of the standard must be requested from either the supplier or the manufacturer and this is to be forwarded to the LA within a reasonable period of time (Good luck with this!)
- It is possible that a plate may have been affixed to the engine at the point of production in a location that is now not accessible.
- It is permissible to have secondary plate affixed to the engine.

Planning requirements to enable realistic auditing

- If a construction project (major development) in London commenced prior to 1st September 2015 would that project have to comply with NRMM?
- A site will only need to comply if the requirement is imposed either by a planning condition or a s106 agreement. The exception to this is where boroughs use the Code of Construction Practice approach. Essentially if the planning condition requires compliance with a published code of practice and the COP has been updated to include the requirements then they will apply whenever the permission was granted.

Merton CoP NRMM Requirements

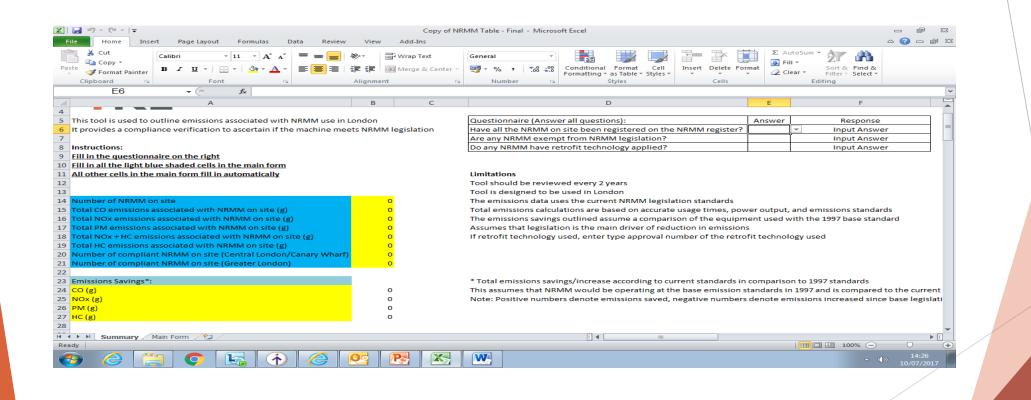
▶ 15. Requirements

- 15.1 NRMM used on major construction sites within Greater London are required to meet at least Stage IIIA of EU Directive 97/68/EC and NRMM on all sites within either the Central Activity Zone or Canary Wharf (CAZ/CW) are required to meet Stage IIIB.
- 15.2 All major development sites in Greater London and all sites within either the Central Activity Zone or Canary Wharf (CAZ/CW) must keep an inventory on site of all NRMM between 37kW and 560kW in use on site.
- 15.3 Further information on how to comply with these standards is available at http://nrmm.london/

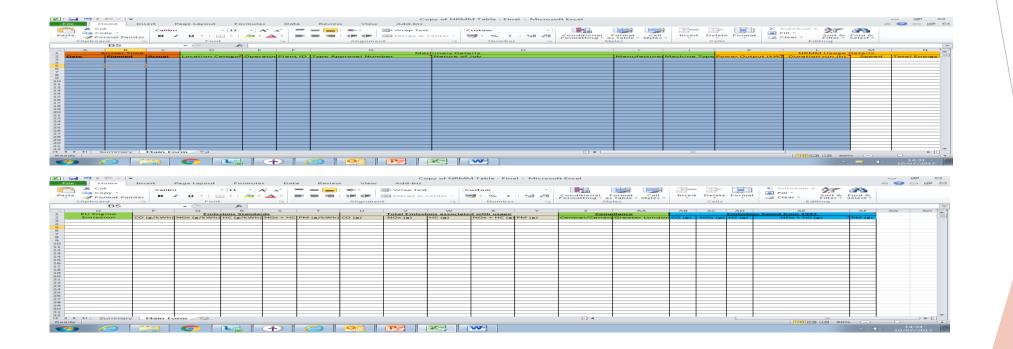
Assessment tool purpose

- We will be using this tool to:
- Gather actual emissions data (now)
- Compare the emissions in a compliant London with emissions in a noncompliant London
- Predict emissions for a compliant London after September 2020

Assessment tool summary



Assessment tool main form



Actions required by partners

- Ensure Planning Officers are au fait with all aspects of NRMM policy and procedures
- Badger Planners to forward required planning applications to us or we will overlook sites
- NRMM planning condition must be included in relevant site approvals
- If not in conditions, NRMM must be referenced in CEMP or local Construction Code of Practice
- Preferably ask for NRMM condition to require discharge (as far as is possible) before construction commences
- Raise NRMM policy when on site for EPA monitoring, etc.

....final thoughts

- There is a desire from most in the industry to do the right thing.
- Compliance can be difficult, simply because of the technicalities
- We need to make administrative compliance as simple and painless as possible.
- No need for enforcement (yet).....compliance driven through education, cooperation and partnership.
- There is a noticeable change in the industry