Template Noise, Vibration Air Quality and Dust Management Plan (Basements)

Site: Westminster Victoria Street, London, SW1E 6QP

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Overview

This document provides guidance and a template noise vibration and dust management plan that forms part of the Wider Construction Management Plan (CMP). This will be required to be submitted and approved by Westminster City Council (WCC) before works commence onsite.

Relevant Guidance

The following guidance are considered relevant for the activities proposed and will be complied with at all times:

- BS5288, 'Code of practice for noise and vibration control on construction and open sites';
- CIRIA Environmental good practice on site
- Network Rail Best Practicable Means: Control of Noise and Vibration from Construction Operations
- London Good Practice Guide: Noise & Vibration Control for Demolition and Construction The London Authorities Noise Action Forum July 2016
- Mayors SPG 'The Control of Dust and Emissions during Construction and Demolition', July 2014
- Guidance on the assessment of dust from demolition and construction, Version 1.1, IAQM October 2018
- Guidance on Monitoring in the Vicinity of Demolition and Construction Sites, Version 1.1, IAQM, October 2018
- Best in Class 'Guidance on Dust and Emissions from Construction' LLECP, March 2019

Site Details

Site details should be provided in the form of a plan/map that locate the site its context within Westminster and depict the site boundary.

Sensitive Receptors

The sensitive receptors are identified based on locations where public could be adversely affected by noise vibration dust and changes in local air quality caused by a development. Higher Sensitive receptors include places such as hospitals, schools/education establishments, theatres, recording studios and residential properties whereas the medium/low sensitivity receptors are shops, workplaces and parks

Residents living within 50m of the Basement can potentially be affected by noise and vibration therefore all sensitive receptors within 50m of the site boundary should be identified.

Residents living in proximity to such a site can potentially be affected by site dust up to 1 km from the source, although continual or severe concerns about dust sources are most likely to be experienced near to dust sources, generally within 100 metres. In general, large dust particles (greater than 30µm) make up the greatest proportion of dust emitted from construction sites and will largely deposit within 100 m of sources. Intermediate sized particles (10-30µm) are likely to travel up to 250-500m. Smaller particles (less than10µm), which make up a small proportion of the dust emitted, can travel up to 1km from sources.

Basements are required to identify dust sensitive receptors within 50m of the site boundary.

Example

The proposed basement is located at in Westminster. (See Figure 1).

Figure 1- Site Location Plan with a 50m Buffer around the site (sensitive receptors: Orange = Residential Green = Commercial)

The sensitive receptors identified within 50m of the site boundary who are most likely to be impacted by site works (See Figure 1) are as follows:

- XX residential properties in Westminster
- XX commercial properties in Westminster
- XX School Behind Next to the site.

Hoarding

The installation of site hoardings is essential for containing construction/demolition dust onsite and to act as a barrier to shield sensitive receptors from noise.

Details of the site hoarding on all site boundaries should be provided along with a plan showing its position.

Hoarding requirements

Prior to any site clearance works a site hoarding will be installed that meets the following standards properties

- A minimum of 2.4-meters in height
- Solid in construction and will be erected on all site boundaries.

The hoarding's properties will require approval from the Highways Team in addition the Environmental Sciences team.

Site Layout

Careful planning of site layout can reduce the environmental impact to nearby sensitive receptors. Sites should be arranged to maximise the distances between storage areas, points of access and egress, stockpiles and other noise, vibration and dust generating activities to the identified sensitive receptors.

Example

The layout of the site will be designed ensure that the noise vibration and dust generating activities and machinery will be located as far away as practically as possible from the off-site sensitive receptors. (See Figure 2)

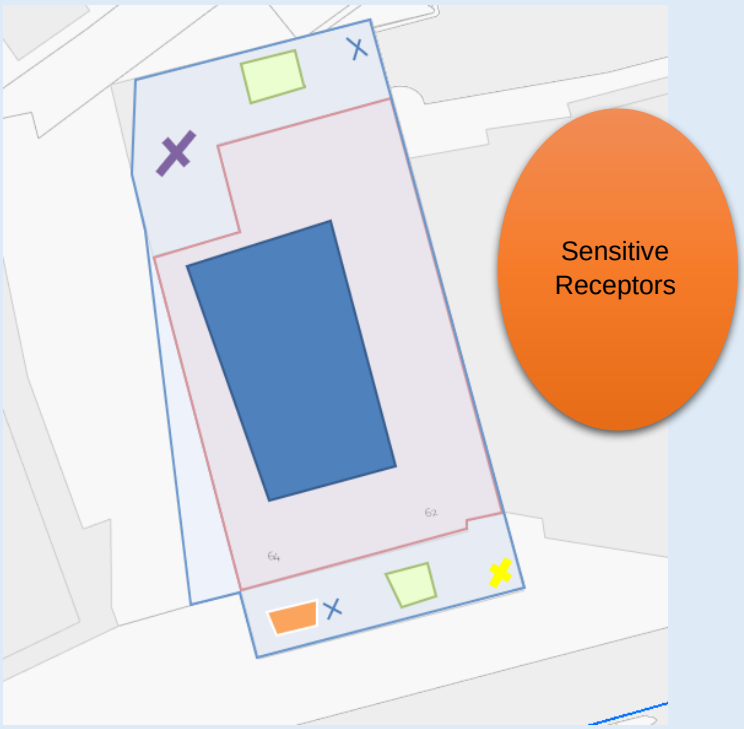


Figure 2:

- Hoarding on site boundaries;
- Location of NRMM;
- Materials and Stockpiling Area;
- Fuel Storage area;
- Wheel wash location (X);
- Water supply point (X);
- Site drainage and enclosed areas to prevent contaminated water leaving the site (X)

Responsibilities and Site Management

Sites are required to have a site manager to manage to manage noise, vibration and air quality pollutants from construction and demolition sites. In addition, they should control community relations to liaise with the stakeholders through the duration of the project.

The roles and responsibilities for the site's Key personnel in relation to noise vibration dust and air quality control should be provided

Example: The following roles and Responsibilities table provides an example of the information required.

Roles	**Responsibilities**
Principal Contractor Details	• Name and Address
Site Manager ***Contact details should be provided***	• Ensure work is carried out in accordance with the CMP • Ensure Workers are aware of the requirements of environmental plans and procedures • Ensure that BPM is implemented and maintained on site • Undertake Subjective and Visual Monitoring emissions as part of general site inspections • Ensure site documentation (method statements and environmental risk assessments) includes noise vibration and dust mitigation • Respond to alerts and complaints and maintain the site diary. • To act as the first and point of contact for the community contact site. • Prepare newsletters communication to neighbours
All Personnel	• Carry out the works in accordance with agreed methods and briefings • Report anything that deviates from agreed processes to site management. • Report all incidents and examples of best practice to section manager • Attend environmental Training and Induction.

Pre commencement Community liaison

Developers are required to notify all identified sensitive receptors/surrounding community association/groups and any other identified stakeholder about the CMP within 50m of the site boundary. Contact is required to be made to a minimum of 3 weeks before submission of the CMP to Westminster City Council. All points and concerns raised by stakeholders following the notification, are required to be reported along with the measures adopted/implemented by site to address any concerns raised.

In addition to the notification process, the applicant is required to review all representations made during the planning application consultation process. Any concerns or comments made relating to construction impacts are required to be identified and the CMP should set out what action is proposed to address these concerns.

Template table summarising Planning Consultation and notification responses.

Community	Community response	Developers response.
Office on Victoria Street	*I am an office and hold meetings at specific hours of the day where we need to meet clients and need discuss important business details*	We have built in "Quiet periods" for particular noisy works packages into our working plan. These will be communicated to all stakeholders so they can arrange their meetings around our quiet periods.
A resident living next door	*I have Asma and is concerned about dust and vehicle emission impacting my condition and health.*	We have ensured that all combustion plant onsite comply with the required emission limits and have ensured that any static combustion plant is place as far away from sensitive receptors as practicable. We have water suppression on site that will be used to control dust and PM10. All waste will be covered and taken away as soon as practicable. Burning of wate will prohibited.
School	*We have exams at the end of the month*	We will ensure where possible that any particular noisy/vibration generating activities will not occur during this period. We will provide site contact details to the School so they can have regular dialog with site to discuss their specific requirements further.

Demolition/Construction Methodology

Site specific methodology for the different phases should be provided. We do not Require RAMS or health and Safety documentation but should set out the methodology simply for identified stakeholders to understand.

It is expected that the site will incorporate the following mitigation points as a minimum into the methodology. Further site-specific mitigation will be required, and this is addressed later in the document.

- **For all Phases**
  - Maximise the screening effect of existing buildings and temporary stockpiles through programming / phasing of works
  - Water Suppression will be provided to prevent fugitive air quality emissions.

- **Demolition (where being used for basement construction)**
  - Maximise the screening effect of existing buildings and temporary stockpiles through programming / phasing of works
  - Utilise low impact demolition methods such as munching techniques – percussive plant should only be used where there is no viable option.
  - Building to be encapsulated sheeted in Acoustic Monaflex to aid in controlling dust and noise emission.
  - Building openings will be kept closed/sealed to aid in controlling dust and noise emissions
  - Building should be isolated to break vibration transmission paths.

- **Piling (where being used for basement construction)**
  - Adopt the following hierarchy of groundwork / piling methods, in order of preference to minimise the impact of piling, if ground conditions, design and safety allows:
    - Pressed-in methods, e.g. Hydraulic jacking
    - Auger / bored piling
    - Diaphragm Walling
    - *Vibratory piling or vibro-replacement*
    - *Driven piling or dynamic consolidation*[1]

- **Construction**
  - Use prefabricated building structures or elements to minimise noise and dust onsite

[1] These methods will not normally be permitted within Westminster due to their potential for high noise/vibration unless evidence is provided that demonstrates that these methods are the only method available.

- When working within a building ensure all openings (e.g. windows and doors) are closed or sealed up.

Example for basement construction.

Piles will be constructed to form the retaining walls and bulk excavation will then commence.

The site will be hoarded before works commence. All static plant such as generators and pumps will be enclosed in temporary acoustic enclosures. Where practicable additional acoustic screening will be provided to specific work areas.

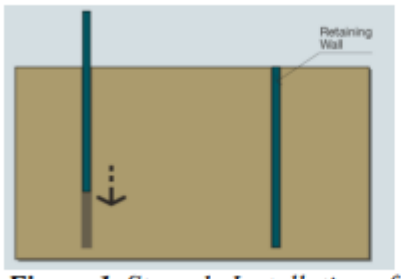


Figure 1. *Stage 1- Installation of Retaining walls*

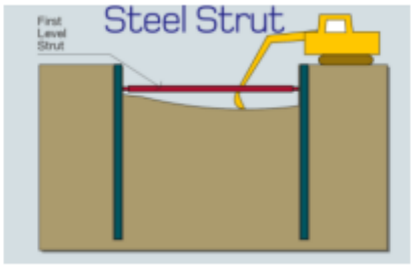


Figure 2. *Stage 2- Excavation and bracing steel strut installation*

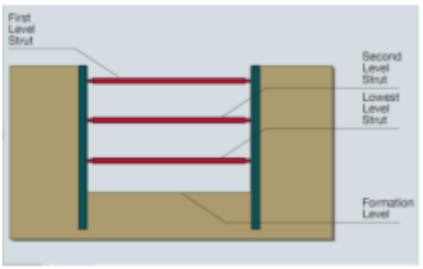


Figure 3. *Stage 3- Excavation and bracing steel strut installation*

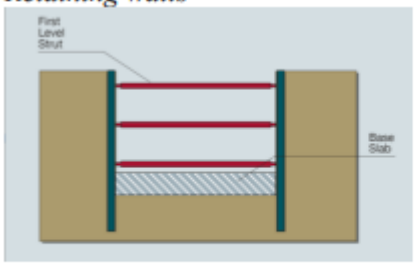


Figure 4. *Stage 4 - Substructure construction.*

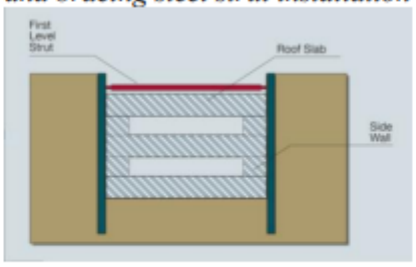


Figure 5. *Stage 5- Substructure construction*

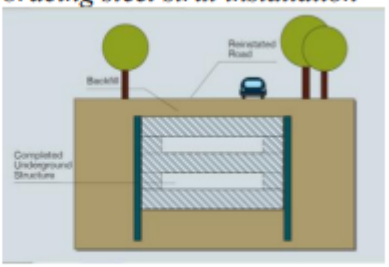
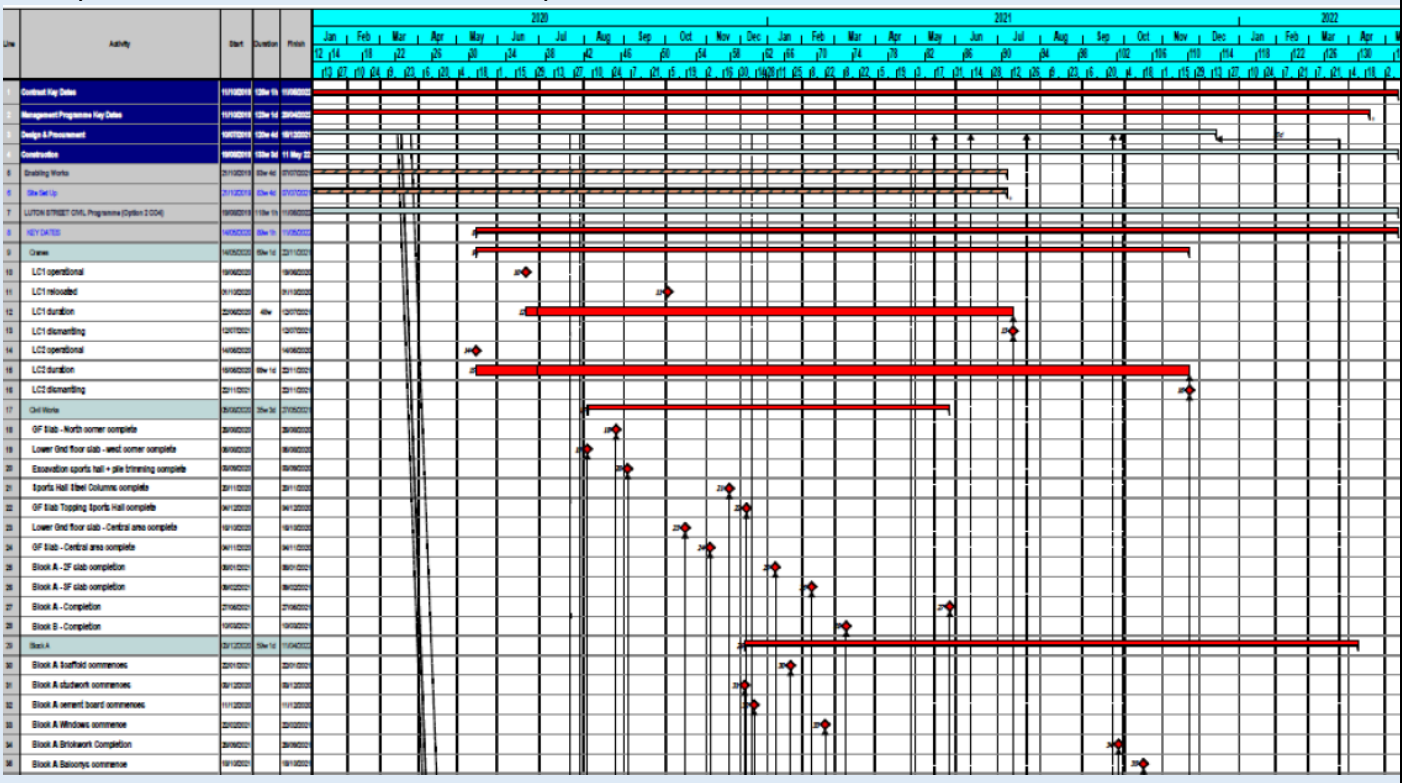


Figure 6. *Stage 6- Backfilling and superstructure construction*

Project Programme of Potential Noise vibration and Dust Generating Activities

The project plan should be provided, that sets out the duration of the works and a timetable that sets out when air quality, noise and vibration generating activities are likely to occur.

Example of the information that will be req



In addition, all the activities that have the potential to give rise to high noise, vibration and air pollution emissions have been highlighted below

Programme of Noise Vibration and Dust Generating Activities

Month	Responsibilities
Site set-up *Month 1*	Installation of hoarding Site traffic, deliveries and general plant operation Vehicle and plant emissions
Demolition *Month 1-2*	Demolition works Site traffic movement, deliveries and general plant operation Vehicle and plant emissions Minimal use of NRMM – most of the demolition by hand so that bricks can be re-used
Basement construction *Month 2-6*	Site traffic movement, deliveries and general plant operation Vehicle and plant emissions Concrete pumping Dig will require excavator & piling rig on site (NRMM)
Construction of structural shell *Month 6-10*	• Site traffic movement, deliveries and general plant operation. Vehicle and plant emissions in connection with the below activities: Steel Frame Brickwork and Blockwork Roofing Metsac walls and rib-deck floors Structure supporting front façade removed during this phase
General fit-out construction *Month 11-14*	• Site traffic movement, deliveries and general plant operation Vehicle and plant emissions
Site demobilisation and completion activities *Month 15*	Reinstatement of footpath and street furniture Removal of hoarding and reopening of footpath

Working Hours

The CMP will need to clearly set out the permitted hours of works and should reference the restriction set by the planning condition.

Permitted working hours are:

Monday to Friday:8.00am to 6.00pm
Saturday:8.00am to 1.00pm

In residential areas noisy works associated with a development or basement excavation will be limited to weekdays from 0800 to 1800 hours, unless otherwise agreed.

Noisy working is not permitted on Sundays and Bank Holidays.

Individual site requirements which differ from the above will be considered on a site by site basis. Noisy operations shall not take place outside these hours without the prior approval of the City Council.

Training

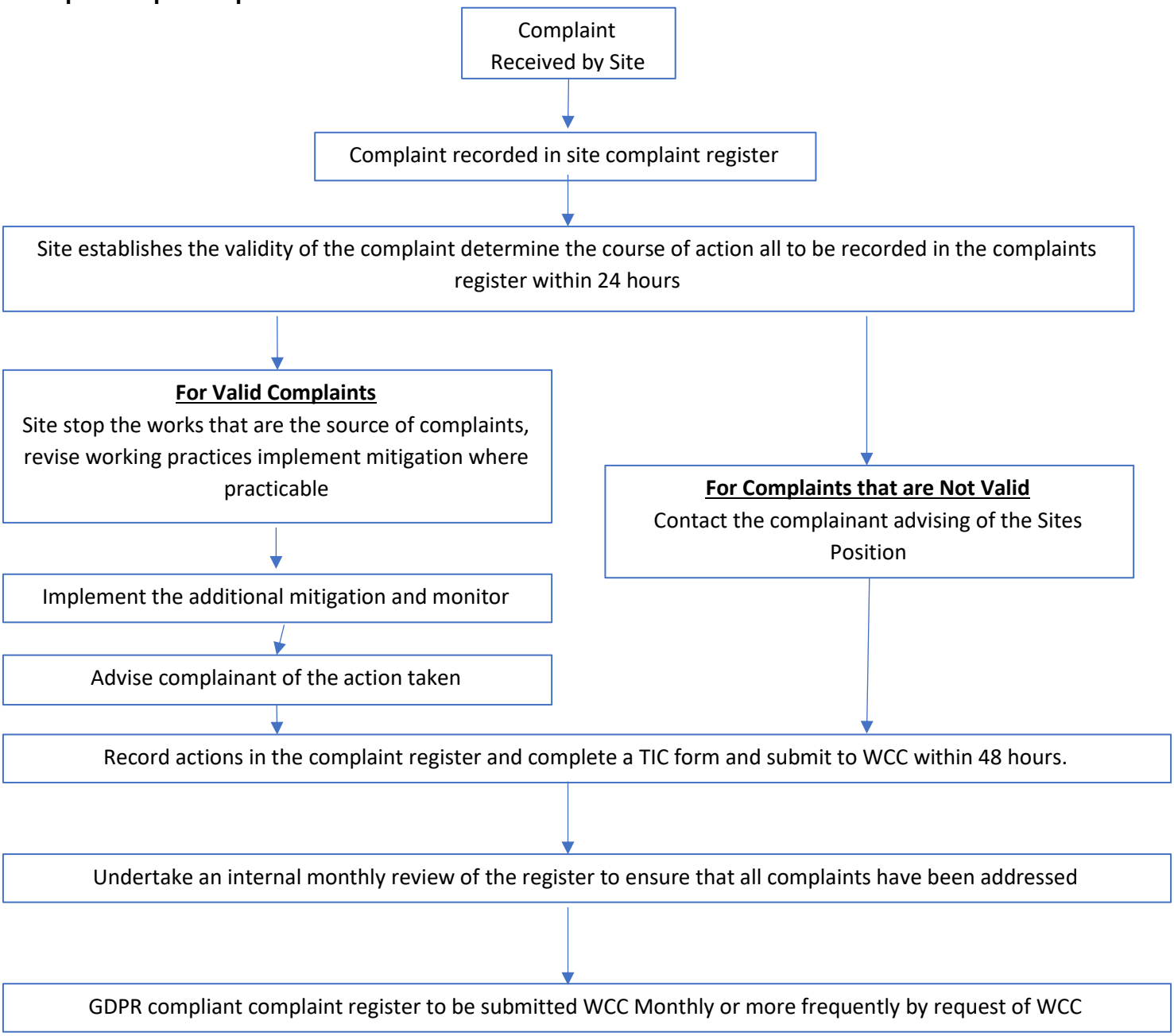
All site personnel are required to be trained and informed about noise vibration, dust and air quality control. The applicant should set out how training will be incorporated into site practice.
For example, sites should incorporate site specific training procedures and practises relating to noise, vibration, air quality and dust control into the site and employee inductions. Toolbox talks will be delivered to all site operatives weekly to ensure that all aspects of the management plan are understood and put into practice.

A management plan will be implemented alongside this document to ensure operatives are aware of the consequences of not following this plan and know how to respond to any potential incidents.

Managing Complaints Compliments

All complaints of air pollution, noise and vibration are required to be recoded investigated and actioned in a timely manner.

Example complaints procedure



Monitoring
Realtime noise, vibration and dust monitoring is not generally required for basement projects unless required by WCC. Basements projects are still required to proactively make boundary assessments of noise and vibration and visual assessments of noise. Where excess noise vibration and dust is noticed by site operatives this should be noted within the site log and action taken to reduce noise, vibration and dust levels.

Subject and Visual assessment procedure

Daily Visual Assessment
A daily inspection of the site will be carried out by the Site Manager or an appropriately trained operator a minimum of two times per day.

The frequency of these inspections will be increased to four times per day when activities with a high potential to produce dust noise and vibration are being carried out on site such as during demolition and basement excavation. The frequency of inspections should also be increased to four times per day during periods of adverse weather, i.e. during periods of dry weather with high wind speeds. The results of these inspections will be recorded logged in the site diary.

Weekly Visual Assessment (Dust)
A weekly off-site inspection will consist of a walk around the perimeter of site and making observations about dust emissions and dust soiling, particularly focusing of locations upwind of on-site activities. Observations will include regular dust soiling checks of surfaces such as street furniture, cars and windowsills within 25m of the site boundary. Inspection results will be recorded in the site diary. Where dust soiling is evident and is not identified by the sites monitoring network additional temporary real-time monitoring may be required by the request of WCC.

Significant Dust and Complaints
If significant dust is identified beyond the site boundary, a TIC form should be completed, and immediate investigation (e.g. though cross checking of site activities and monitoring data)/remedial action should be undertaken. The Site Manager will ensure that the TIC forms are submitted to WCC within 2 working days.

Actions will be recorded in the site diary.

Mitigation Measures

All sites are required to mitigate their environmental impact to identified sensitive receptors**.** The Following risk assessments are not formally required for Basement projects although the mitigation measures that are

set out within these documents should be reviewed to set out the mitigation measures that the site should apply.

WCC understands that as construction processes evolve mitigation measures also evolve. Developers and contractors are recommended to contact WCC at the earliest opportunity to discuss any new innovative methods to control environmental impacts that the developer or contractor may wish to trial

London Authorities Noise Action Forum (LANAF) Noise and Vibration Risk Assessment.
The risk assessment provides good practice measures for the following stages of the development:

- General Considerations
- Plant Vehicle Activity
- Demolition Phase
- Ground Works and Piling Phase
- Construction Phase
- Monitoring
- Communication and Liaison

Sites are not required to complete the LANAF risk assessment

The measures identified in the tables are by no means an exhaustive list but do capture good practice measures to help sites mitigate noise and vibration impacts.

Please note that following this guidance does not constitute a legal defence for the use of Best Practicable Means, and that the specific guidance presented in the approved Codes of Practice (BS 5228) under s71 of Part III of the Control of Pollution Act 1974 are relevant to the carrying out of works to which Section 60 of the Act applies..

Noise Mitigation Measures

The measures set out below are the minimum requirements and Westminster will also encourage developers to be look at innovative approaches to controlling noise and vibration.

The site will always have staff present with the authority to the take the steps necessary to ensure that noise and vibration is controlled.

All staff will be inducted and briefed on their responsibilities to the application of noise control and the use of BPM to minimise noise and vibration impacts. Training should be regularly reviewed and repeated through all phases of the development.

All sites shall be surrounded by solid hoarding to the required height and density appropriate to the noise sensitivity of the location concerned. Where this is not possible

the site should be fenced that has been acoustically treated for example acoustics blankets. Any damage to the fencing or hoarding surrounding a worksite will be immediately repaired by the nominated representative.

Site should be laid out so that noisy plant or equipment is sited as far away as is practicable from noise sensitive buildings. The use of barriers, (e.g. soil mounds), site huts, acoustic sheds or partitions to deflect noise away from noise sensitive areas must be employed wherever practicable. The sequence of demolition and construction should be planned to leave structures in place or build structures that may shield sensitive buildings from noise for as long as practicable.

All access and egress gates will be controlled to ensure that they are open for the minimum time to allow entry and exit of vehicles minimise noise breakout and should be located as far away from noise sensitive receptors as possible.

Care should be taken when loading or unloading vehicles or dismantling scaffolding or moving materials to reduce impact noise. Loading or unloading including the use of conveyor belts for soil excavation may have to be housed in suitable acoustic enclosures.

Plant and Equipment

Where practicable WCC strongly encourage that mains electricity should be provided onsite from the start of the project to prevent the use of generators

Where quieter electrically powered equipment is available or practicable to use, WCC recommend that this is used rather than diesel-petrol powered alternatives.

Vehicle and mechanical plant used for the purpose of the works shall be fitted with effective exhaust silencers, will be maintained in good and efficient working order and operated in such a manner as to minimise noise emissions.

Fixed position equipment for example generators and compressors must be "sound reduced/silent" models and should be fitted with properly lined and sealed acoustic covers, that must be kept closed whenever the machines are in use. Equipment should be placed to maximize distances from nose sensitive receptors and were practicable enclosed shielded.

Machines in intermittent use should be shut down in the intervening periods between works or throttled down to a minimum.

Vehicle Movements

All vehicle movements must occur within normal hours or at agreed times, considering the primary function of sensitive receptors in the vicinity (i.e. avoiding school drop-off/pick-up periods).

Maximise the reuse of any waste arising on site to minimise vehicle movements.

Plan deliveries and vehicle movements so that vehicles are not waiting or queuing on the public highway and enforce a no idling policy for all delivery vehicles.

Plan site layout to ensure that reversing is kept to a minimum, and where possible eliminated altogether. Sites were reversing is permitted ensure that reversing alarms are broadband reversing sirens and where it is safe to disengage all sirens and use a banks person.

Care should be taken when loading or unloading vehicles or moving materials to reduce impact noise. Loading or unloading bays may have to be housed in suitable acoustic enclosures.

Demolition Phase

Equipment that breaks concrete by bending, munching, pulverizing, using rotary drills and “bursters” activated by hydraulic or electrical power, or chemically based expansion compounds, to facilitate fragmentation and excavation of hard material rather than by percussion or such other equipment

Avoid the transfer of noise and vibration from demolition activities to adjoining buildings through cutting any vibration transmission path or by structural separation or isolation.

Rather than breaking in-situ, consider the removal of larger sections by lifting them out and breaking them down either in an area away from sensitive receptors or off-site.

Pilling Phase

Piling methods using a diesel or air driven impact or drop hammer will not be permitted onsite unless there are specific engineering reasons, and this is only feasible technique. Techniques such as hydraulically operated or vibratory hammers may be necessary in these circumstances to drive and extract sheet piling, provided the soil strata are suitable for such equipment.

Rotary drills and bursters actuated by hydraulic or electrical power should be used for excavating hard material where practicable.

Construction Phase

Using prefabricated building structures or elements to minimise noise on site. Where prefabrication is not possible cutting of materials should be undertaken within the building envelope or in an acoustically treated cutting area.

When working within a building ensure all openings (e.g. windows and doors) are closed or sealed up to prevent noise escape.

Where concrete pours are required, consider their sizes and plan the start of concrete pours as early as possible within normal working hours to avoid the possibility of the site overrunning past normal working hours.

As far as reasonably practicable, the noise from reversing alarms will be controlled and limited. This will be managed through the following hierarchy of techniques:

- the site layout will be designed to limit and where reasonably practicable, avoid the need for the reversing of vehicles however, it is important to note that certain plant must utilise audible warning systems during operation; prior to commencement of works drivers will be made familiar with the worksite layout.

- banksmen will be utilised to avoid, as far as reasonably practicable, the use of reversing alarms. reversing alarms incorporating one of more of the features listed below or any other comparable system will be used where reasonably practicable:

    - highly directional sounders.

    - use of broadband signals.

    - self-adjusting output sounders.

    - flashing warning lights.

reversing alarms will be set to the minimum output noise level required for health and safety compliance.

Air Quality Dust Risk Assessment

The Greater London Authority's Supplementary Planning Guidance (SPG) for the control of dust from demolition and construction can be used as a guide to assess the dust impacts and mitigation measures required by the development. Guidance published by the IAQM on the 'Assessment of Dust from Demolition and Construction' should also be referend to when making the assessment.
The measures identified in the tables in appendix 7 of the guidance are by no means an exhaustive list but do capture good practice measures to help sites mitigate noise and vibration impacts. Please note that following this guidance does not constitute a legal defence for the use of Best Practicable Means, and action can still be taken under section 79 and 80 of the Environmental Protection Act 1990

As construction processes evolve so should the measures which control dust and particulates and developers / contractors are recommended to contact WCC at the earliest opportunity to discuss any new innovative methods that the developer or contractor may wish to trial.

The risk assessment provides good practice measures for the following stages of the development:

- Demolition
- Earthworks
- Construction
- Trackout

The mitigation measures set out in appendix 7 of the Mayors SPG should be used and implemented onsite. Implementation of these Best Practice Measures will help reduce the impact of the demolition and construction activities.

With these mitigation measures enforced, the likelihood of nuisance dust episodes occurring at those receptors adjacent to the development are considered low.

On Road Vehicle and Non-Road Mobile Machinery (NRMM) Emissions

On Road Vehicles

All on-road vehicles will comply with the Ultra-Low Emission Zone (ULEZ) vehicle emission standards. (currently petrol/diesel Euro 6 and Euro VI) as a minimum. It is Highley recommended that that sub contractors and suppliers have been contacted to set out there responsibilities in using ULEZ compliant.

The use of Ultra-Low Emission Vehicles (ULEV) (e.g. Electric, Hybrid (Electric-Petrol) where possible will be encouraged at the procurement stage of the tender for these services. The Applicant will actively work with suppliers that can provide electric or hybrid vehicles where practicable.

Construction site workers will use sustainable means of travel (public transport, walking and carsharing). Information on public transport access to site will be provided in the form of noticeboards and toolbox talks. Car-sharing for contractors will be encouraged on-site by putting in place a notice board, in order for to people to register for car sharing opportunities.

Non-Road Mobile Machinery (NRMM)

Prior to the commencement of works the development all site shall be registered on the NRMM register https://london.gov.uk/non-road-mobile-machinery-register and all NRMM with engines of 37kW-560kW, shall be uploaded.

All NRMM if equal to or over 37kW operating within Westminster, shall comply with the Stage IV NOx and PM10 emission standards. Stage IV emission limits are not defined in legislation for Constant Speed engines (for example generators), therefore the emission standard required for those engines is effectively Stage V. The emission standards relate to the Non-Road Mobile Machinery (Type-Approval and Emission of Gaseous and Particulate Pollutants) Regulations 2018 and its subsequent amendments.

The standards for the NRMM Low Emission Zone will get progressively tighter over time and the emission limits will follow the dates below:

- From 1 of January 2030 the standards will be stage V throughout Westminster
- From 1 of January 2040 only zero emission machinery will be allowed.

Where compliance with Stage IV requirements is not achievable or practical, an exemption will be sought from WCC before arrival of the equipment on site and the details recorded.

NRMM where the power output is less than 37kW will be fitted with an after-treatment device (DPF) stated on the approved list managed by the Energy Saving Trust; the ongoing conformity of plant retrofitted with suitable after treatment devices, to a defined performance standard, should be ensured through a programme of on-site checks

Use of NRMM will be minimised as much as possible and electric or battery powered alternatives will be used as a preference. If NRMM under 37kW is to be used, use of the equipment will be minimised and kept as far away from sensitive receptors as is practicable. For NRMM under 37kW, the contractor will endeavour to use equipment fitted with after treatment devices where practicable.

Considerate Contractors Scheme

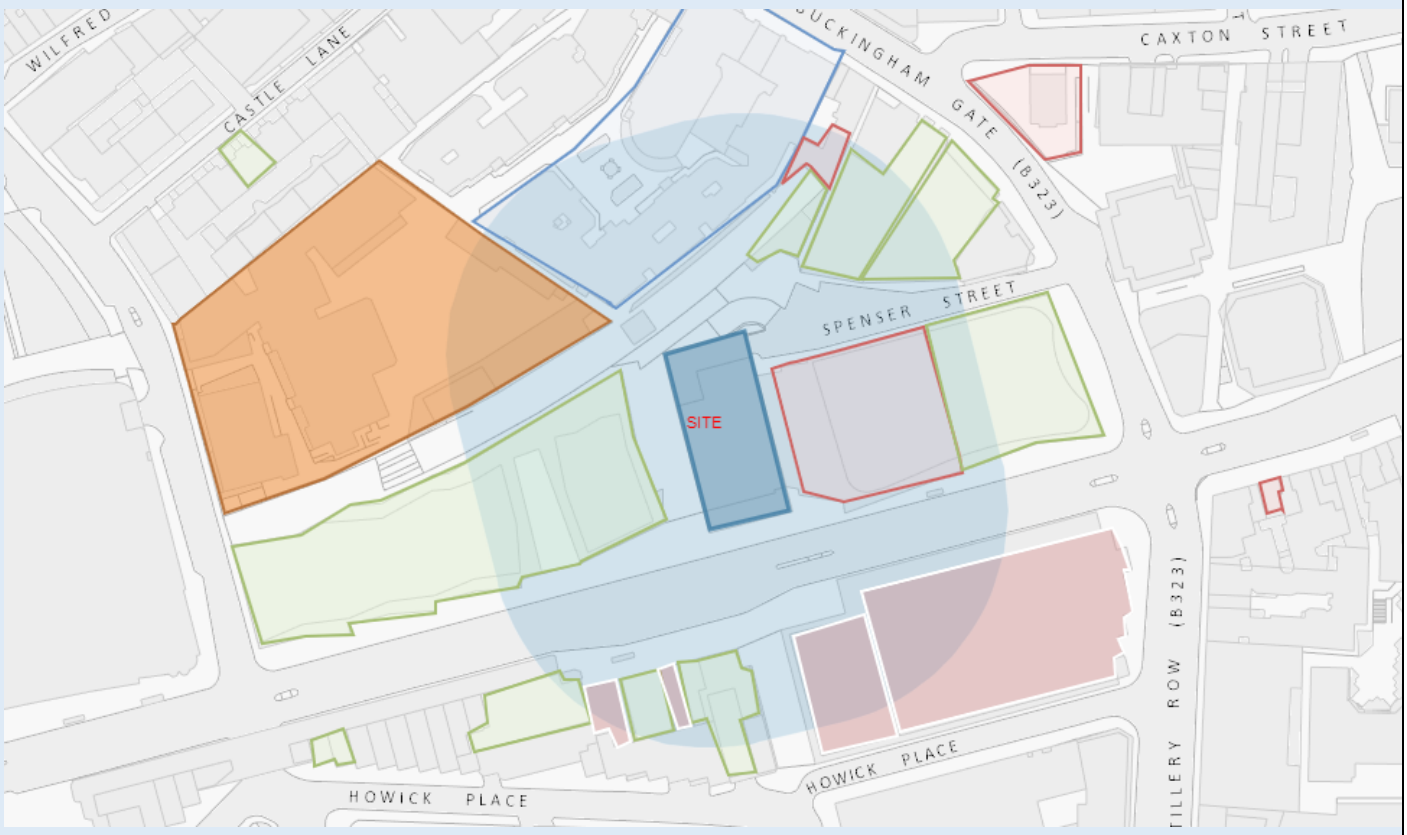
All level 1 and 2 site are required to be signed up to the Considerate Contractors Scheme (CCS). Sites will be required to provide evidence in that they are members and confirm that they will follow the schemes recommendations.

Community Liaison During site Works

All basements are expected to provide regular site updates to all local stakeholders. As a minimum the communication will be made with all stakeholders and all sensitive receptors within 50m from the site and in addition include all stakeholders that provided responses to the original notation of the CMP. Should any additional stakeholders become apparent during the project these should be added.

Example Public Communication Strategy

Site will regularly communicate with all the receptors that have been identified below. The Blue shaded area representants a 50m buffer from the site boundary. Areas highlighted outside of this shaded area provided a response to the pre commencement consultation.



- Green Residential
- Red Commercial
- Orange Education
- Blue Hotel

The following communication strategy will be adopted.

Site Notice Board

A noticeboard will be attached to the site hoarding that includes:

- Named site contact details
- Information about the project and a copy of the monthly newsletter
- Site working hours
- Out of Hours emergency contact details

Monthly Newsletters

Newsletters may be required to be distributed to all identified stakeholders monthly either electronically or by letter drop. The frequency of newsletters may need to be increases where there are periods of multiple complaints or particularly noisy or high dust generating activities.

The content of newsletter should include:

- Site working hours (including any reduced noise times)
- A monthly look ahead that provides a brief outlie of proposed work packages for the coming month
- Any proposed, agreed out of hours works (e.g., Tower crane erection/large plant delivery).
- Contact names and numbers for site

The frequency of the news letters may be increased at the request of WCC.

Liaison with Other Construction Sites

Construction sites will be required to hold regular Hold regular liaison meetings with other development sites that are in close proximity (up to 50m) from the site boundary.

Local Authority Liaison

Sites are required to hold regular monthly meetings with Westminster's Environmental Sciences team. During these monthly meetings the following discussion topics will be discussed. An indictive inspection record is available in appendix.

- Look back at previous months activities
- Look forward of coming months activities including any proposed future out of hours works
- Results of Monthly Monitoring
- Inspection of site complain log and feedback of any complaints
- Feedback forms any stakeholder communication.
- NRMM compliance