23rd September 2024

Flooding Incident S19 Report

London Borough of Sutton

Document Reference: 1000010516 – LBS S19 Flood Investigation

March 2025

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Sutton

PROJECT CENTRE

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Job Number	Issue	Description	Originator	Checked	Authorised
1000010516	01	Initial issue	Hannah Watson-Hill 28.03.2025	Marc Inman 02.04.2025	Joe Hitchman 02.04.2025
1000010516	02	Incorporate comments	Hannah Watson-Hill 27.06.2025	Marc Inman 27.06.2025	Joe Hitchman 27.06.2025

File path: G:\Project Centre\Project-BST\1000010516 - LBS S19 Flood Investigation\2 Project Delivery\5 Design & WIP\FM\S19 Report - Event of 23_09_2024 .docx

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1. INTRODUCTION

A number of flood incidents were reported to the London Borough of Sutton (LBS) on 23rd September 2024 including nine reports of internal property flooding at Mullards Close and Reynolds Close. Project Centre Ltd (PCL) have been commissioned to prepare a Section 19 Flood Investigation Report on behalf of the LBS Lead Local Flood Authority (LLFA).

This report has been prepared based on the information available at the time of reporting and has been prepared with the assistance of:

- LBS as LLFA and Highways Authority
- Environment Agency
- Thames Water
- The residents of Mullards Close and Reynolds Close

1.1 Requirements for investigation – Flood and Water Management Act 2010

Under Section 19 of the Flood and Water Management Act 2010 (FWMA 2010) the London Borough of Sutton, as a Lead Local Flood Authority, have a duty to investigate flood incidents.

Section 19 of the FWMA 2010 states:

> *(1) On becoming aware of a flood in its area, a lead local flood authority must, to the extent that it considers it necessary or appropriate, investigate—*
>
> *(a) which risk management authorities have relevant flood risk management functions, and*
>
> *(b) whether each of those risk management authorities has exercised, or is proposing to exercise, those functions in response to the flood.*
>
> *(2) Where an authority carries out an investigation under subsection (1) it must—*
>
> *(a) publish the results of its investigation, and*
>
> *(b) notify any relevant risk management authorities*

1.2 Requirements for Investigation

The Sutton Local Flood Risk Management Strategy (2022) sets out the threshold criteria for triggering flood investigations under Section 19 of the FWMA 2010. This policy states that a formal investigation will occur:

- Where internal flooding of five or more properties has been experienced during a single flood incident
- Where critical infrastructure (e.g. main roads impassable to traffic) has been affected by flooding more than once within a 12 month period

Investigations may also be carried out at the discretion of Sutton where the source of flooding is ambiguous. As the flood event of 23rd September 2024 resulted in nine properties reporting internal flooding, the threshold to trigger a Section 19 investigation has been met.

A Flood investigation does not necessarily require a thorough investigation of the flood event, or the flood mechanism, but must determine the Risk Management Authorities (RMA) responsible for various functions. An LLFA may, however, choose to undertake more detailed investigation into a flood incident to better deliver the objectives of the Local Flood Risk Management Strategy, for example improving the understanding of flood risk within its area of responsibility.

2. Background to flood event of 23rd September 2024

2.1 Overview

This section provides an overview to the flooding that occurred on 23rd September 2024 including the known location and extent of flooding at which internal property flooding occurred, the preceding rainfall event, and context of the existing drainage infrastructure within the affected area.

2.2 Location and known extent of flooding

The affected area includes properties within Mullards Close, Hackbridge and Reynolds Close, Carshalton, located in the north-eastern region of Sutton Borough. The site is in close proximity to the River Wandle, an EA-designated main river. The river bifurcates at Hackbridge Road and rejoins 0.5km to the north, encompassing Reynolds Close.

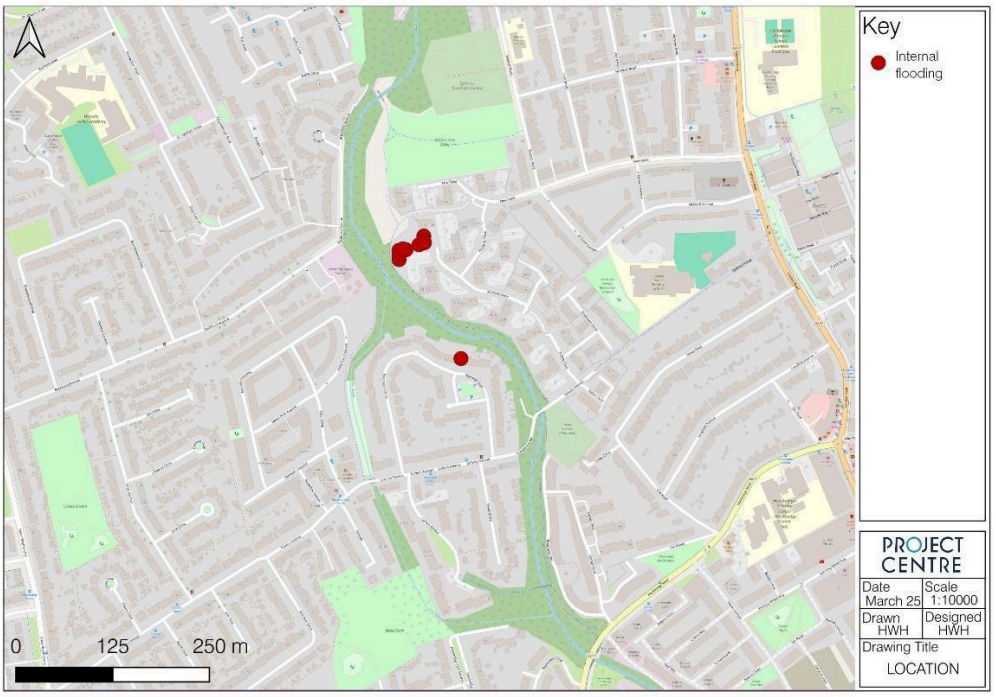

Figure 1: Location of flood incidents

Table 1 summarises the locations of flood events reported on 23rd September relevant to this report. This information has been prepared based on the information reported to LBS at the time of flooding and subsequent discussions with other RMAs, and affected parties.

Table 1: Summary of reported incidents and known flood extent

Location	Details of flooding
Mullards Close, Hackbridge	Eight reports of internal property flooding, blocked drains, electricity cut off in some flats.
Reynolds Close, Carshalton	One report of internal property flooding, and flooding in rear gardens.
Wallington Bridge (Manor Road)	Stranded vehicle under the bridge.
Goat Road	Roadway flooding

The event also affected other areas of the borough, including Beddington Lane and Rosehill Park West, as well as parts of London such as South Harrow and South Ruislip and the Royal Borough of

Kensington and Chelsea. However this report focuses on Mullards Close, Reynolds Close and surrounding areas as this is where internal flooding was reported.

It should be noted that areas further downstream on the River Wandle, in the London Borough of Merton, were also affected by flooding.

In Mullards Close, residents first noticed flooding at 3am and this lasted a couple of hours. The carpark and ground floor properties were affected, with water reaching the hubcaps on cars. Water was reported to ingress into ground floor flats from the edges rather than underneath, suggesting it entered through the airbricks. The flooding caused electricity to be cut-off in some flats and some flooring/furniture needed to be replaced. However, the extent of flooding was not sufficient to be pumped out and was managed by the residents.

In Reynolds Close there was a number of rear gardens flooded, in addition to one case of internal property flooding.

Wallington bridge was reported flooded at 01:00. A contractor was contacted by LBS to organise gully clearing, which took place at 07:10 along with mechanical sweeping of the street to clean any debris. Police and London Fire Brigade attended the scene and left by 02:45, however a vehicle remained stranded until 14:15, and the road was reopened at 15:00.

All affected roads were reopened by the afternoon of 23rd.

2.3 Rainfall

2.3.1 Preceding weather conditions

The month of September 2024 saw exceptional rainfall across southern England, with recorded totals of almost 300% of the long-term average in the Thames catchment area. The UK Centre for Ecology & Hydrology's Hydrological Summary for September 2024 confirms that the region experienced one of the wettest Septembers on record.

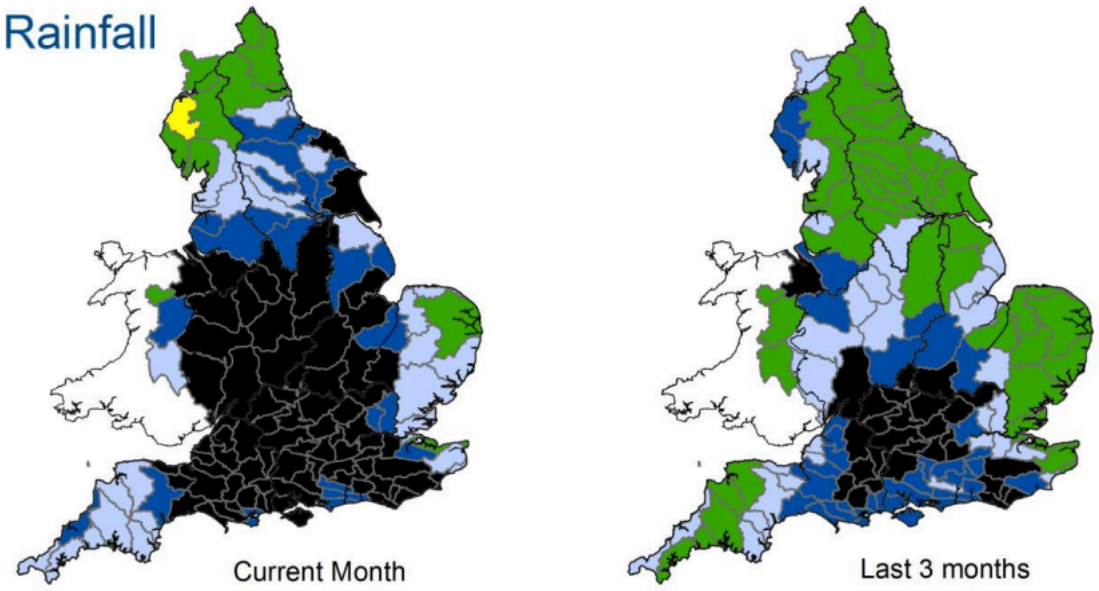

Figure 2: Accumulated rainfall for the month of September 2024. Darker colours mean an exceedance of average monthly values, denoting wetness. Source: Monthly water situation report – England, Environment Agency, September 2024

The soil moisture deficit is the amount of rain required to bring soil moisture levels to field capacity, which is the maximum amount of water soil can hold against gravity. At the end of August 2024, the soil moisture deficit for the South London area was 101-130mm. This was reduced to 11-40mm by the end of September 2024. This suggests that there was some capacity to absorb rainfall at the start of the event of 23rd September, however the high intensity rainfall likely led to rapid saturation, significantly reducing infiltration rates as the event progressed.

2.3.2 Rainfall on 23rd September 2024

During the early hours of 23rd September 2024, a period of intense rainfall was recorded across Sutton and the surrounding areas. The Beddington rainfall gauge measured 58.2mm of rainfall within 24hrs, a value exceeded only once in the previous 10 years. This amount is greater than the average total rainfall for the entire month of September. Between 00:00 GMT and 04:00 GMT, rainfall totals of 35.51mm were observed based on radar data. The heaviest rainfall occurred at 00:00 GMT (13 mm) and 01:00 GMT (9.48 mm). Additional rainfall measurements from various sources are summarised in Table 2 below:

Table 2: Recorded rainfall on 23rd September 2024

Time (GMT)	Radar Data (mm)	IBM Data (mm)	Rain Gauge (mm)
00:00	13	18.3	22.9
01:00	9.48	11.1	14.8
02:00	6.2	7.4	9.2
03:00	6.83	7.1	8.6

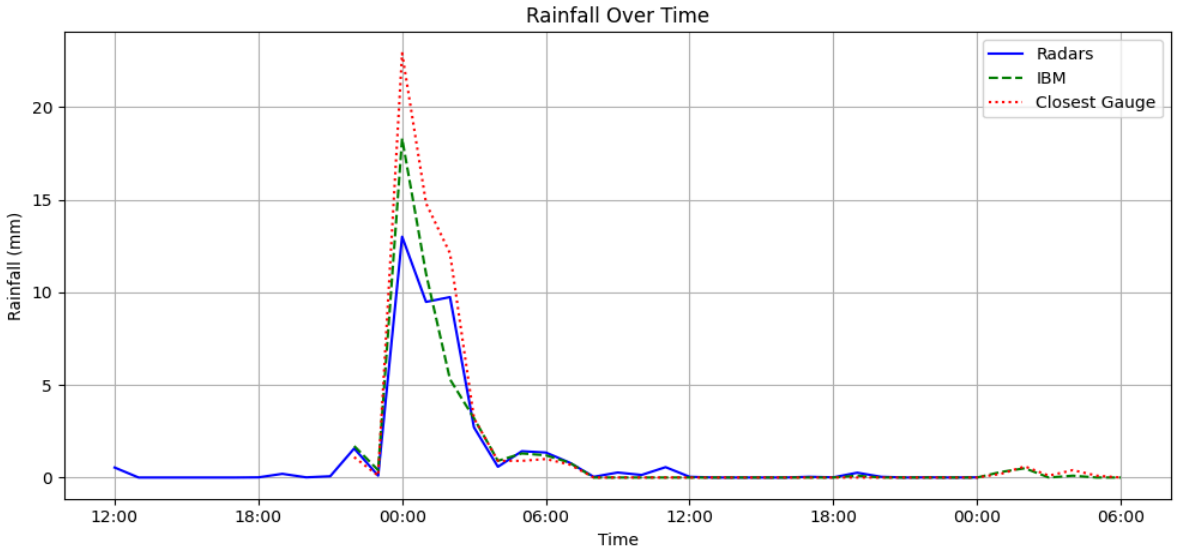

Figure 3: Recorded rainfall intensities from 12:00 GMT 22nd September to 06:00 GMT 24th September 2024, in 1 hour time steps

At 01:45 GMT, a soakaway at Wallington Bridge recorded its highest level in at least three years, marking the first instance in that period where the soakaway level was positive, likely indicating rainfall rates exceeded infiltration rates and highlighting the exceptionally intense rainfall event.

A 25m Instacasting Report, produced by Previsco, analysed the event and identified high-intensity rainfall clusters across south London, including areas near the River Wandle. The report estimated total rainfall of 60-70 mm over 48 hours, with contributions from both local and upstream catchments.

2.4 Main River

The Wandle River has been designated a Main River by the EA and flows alongside the affected areas. During the flood event of 23rd September, gauges at Hackbridge and Summerstown recorded their highest levels, coinciding with periods of heavy rainfall and reported flooding.

At 02:45 GMT, the Hackbridge gauge recorded a peak level of 2.04m, aligning closely with the heaviest rainfall between 00:00 GMT and 04:00 GMT and the first reports of flooding in Mullards Close at 02:00 GMT. By 12:15 GMT, river levels had returned to normal, suggesting a rapid response to rainfall, followed by relatively quick recession. This is shown in Figure 4.

Photographs taken shortly after the flood shows water marks on the building reached a level of approximately 24.28 mAOD. This is above the height of the airbricks, which are a likely entry point for floodwater. While the river gauge at Hackbridge recorded levels consistent with a 1-in-75 year flood, the actual observed water level at the properties corresponds to the EA's modelling for a much more severe 1-in-100 year flood event plus 27% uplift for climate change. This implies that flooding was due to a combination of surface water and river overtopping.

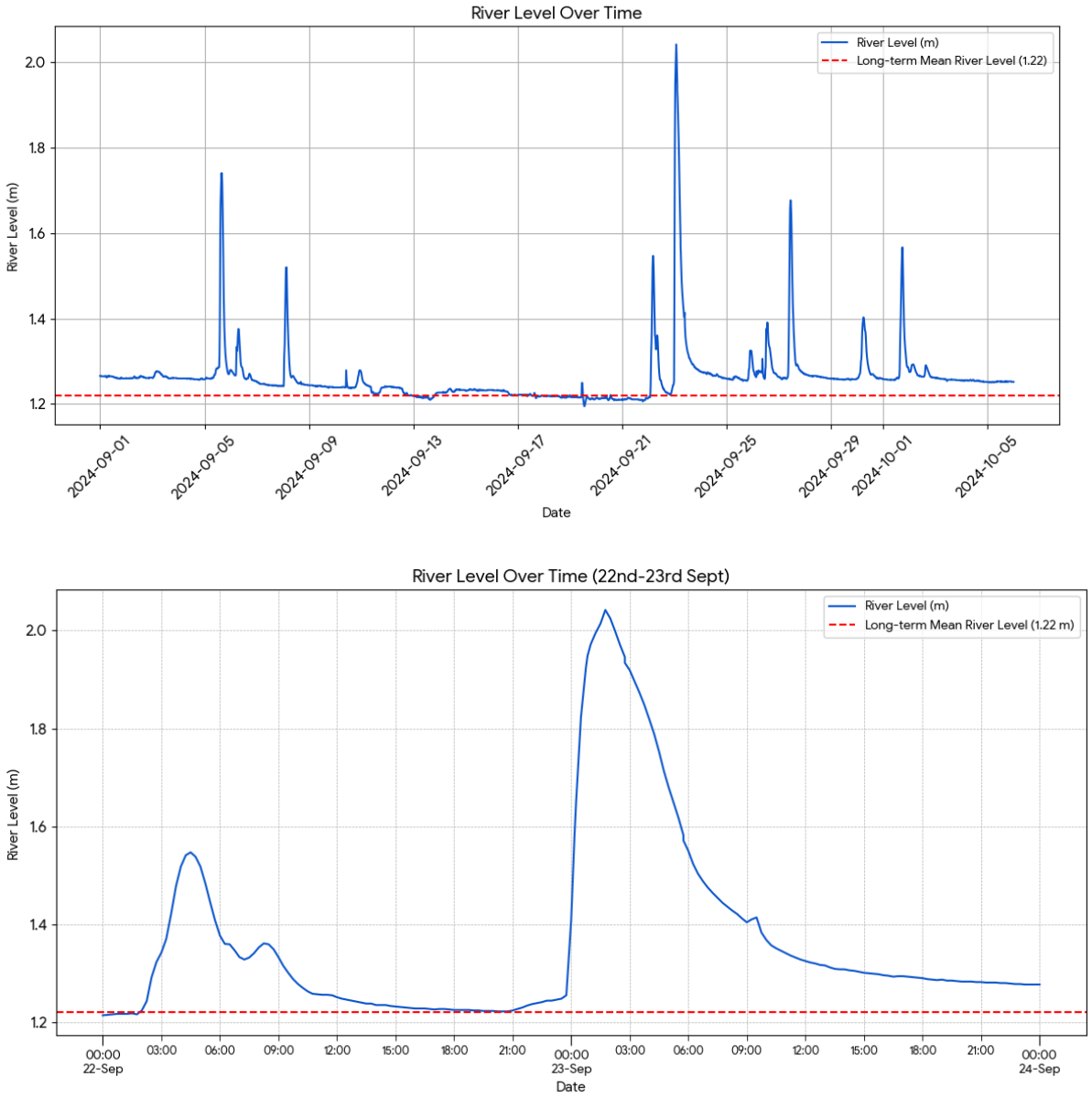

Figure 4: River Wandle water level at Hackbridge gauge over the month of September (top) and from 22nd to 23rd September 2024 (bottom), times in GMT

Recent modifications to the Goat Bridge Weir, aimed at improving aquatic habitat and flood resilience, are unlikely to have worsened flooding and may have helped mitigate some impacts. The works, completed before the flood event, involved lowering the weir height to enhance fish passage and also provided additional flood storage capacity, potentially reducing the number of properties affected. As part of the project, a 'downed' tree was deliberately placed in the river, approved under a Flood Risk Activity Permit (FRAP) issued by the EA.

There is a sluice gate that serves to maintain base flows and prevent fish stranding during dry periods. However it is not manually operated and remains closed under normal conditions, allowing overtopping during high flow events rather than being used as a flood control mechanism.

Vegetation along the riverbanks is dense, which can restrict flow capacity if not adequately maintained. However, it is not considered a primary contributing factor and did not play a significant role in the 23rd September flood. The banks of the Wandle in the affected area are relatively shallow,

with minimal freeboard between the river and adjacent footpaths, making them susceptible to overtopping. The extent to which this is due to natural erosion or historical modifications is unknown.

2.5 Potential sources of flooding

A review of the EA's Risk of Flooding from Surface Water (RoFSW) data shows that both Mullards Close and Reynolds Close are at medium chance of flooding from surface water, as shown in Figure 5. This means that these areas are predicted to flood between the 1 in 100 year rainfall event and the 1 in 30 year event. Some areas are at high risk, flooding for events more frequent than the 1 in 30 year event.

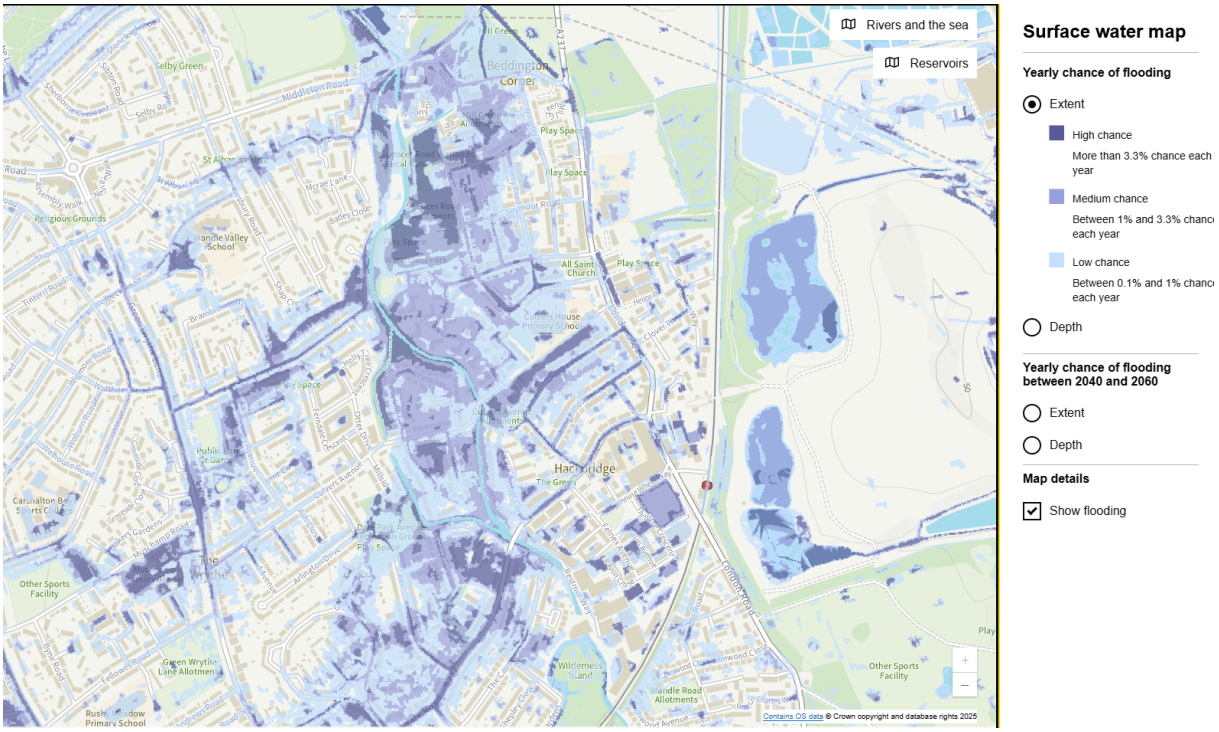

Figure 5: EA RoFSW map

The area is also at risk of flooding from Rivers. These areas are in Flood Zone 3 according to EA mapping, meaning there is a high probability of flooding from rivers or the sea. This is shown in Figure 6. A site visit has confirmed there are no walls or other defences separating Mullards Close and Reynolds Close from the River Wandle.

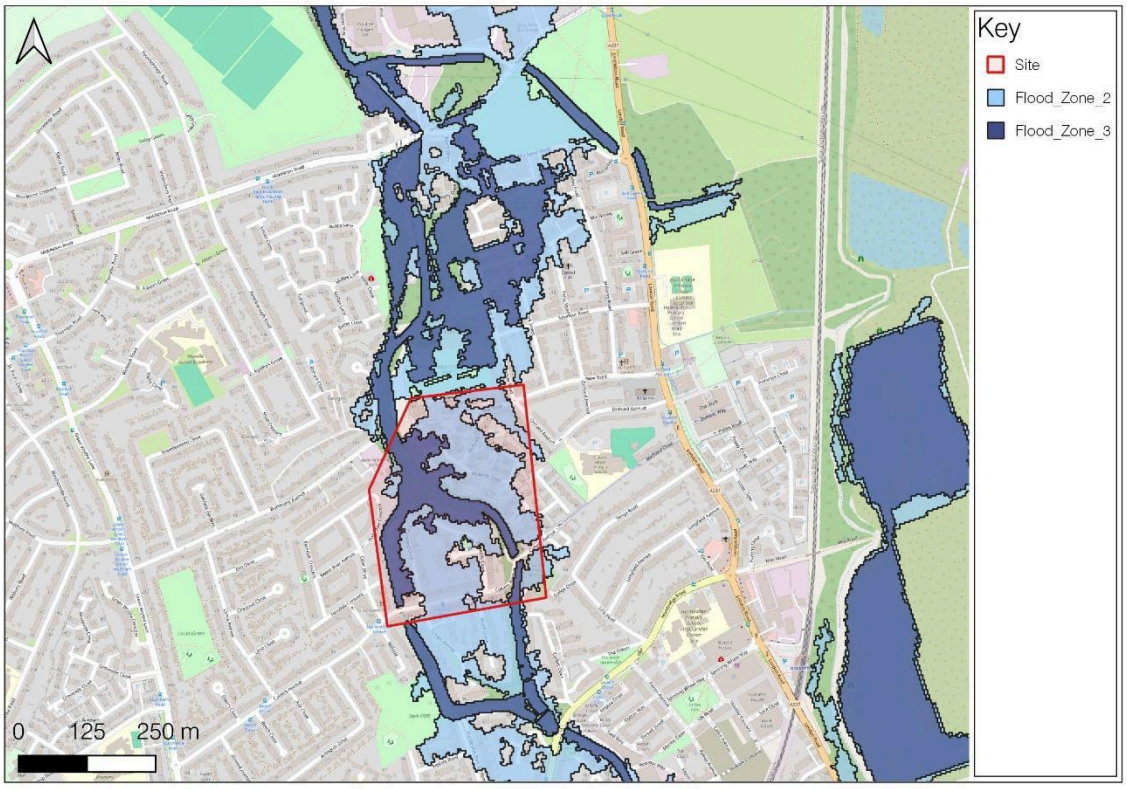

Figure 6: EA Fluvial Flood Zone map

All developments complied with flood protection requirements when constructed, however legislation has been updated and new builds in that area would require further mitigation measures e.g. raising finished floor levels. Recent modelling of the Wandle by the EA confirms that the properties impacted by this event are at high risk of flooding.

2.6 Existing drainage infrastructure

A review of Thames Water assets shows surface water sewers discharge into the River Wandle at multiple locations. High levels within the river may have prevented the surface water sewer network from efficiently discharging, causing the system to back up and not be able to drain the surrounding neighbourhoods.

3. Roles and responsibilities

This section sets out the roles and responsibilities of the various Risk Management Authorities (RMAs) and other parties in relation to flood risk in the London Borough of Sutton.

3.1 London Borough of Sutton

3.1.1 Responsibilities

LBS is the Lead Local Flood Authority (LLFA), the Highway Authority, the Local Planning Authority, and a landowner.

The FWMA 2010 gives LLFAs powers and duties for managing local flooding issues as well as some flood risk management functions such as:

- A duty to investigate flooding incidents under S19 of FWMA 2010 as described in Section 1.1 of this report.
- A duty to develop, implement, and maintain local flood risk management strategies.
- A duty to maintain an asset register of structures and features that are likely to have a significant effect on flood risk.
- A duty to prepare and maintain preliminary flood risk assessments
- A duty as a statutory consultee to provide technical advice to Local Planning Authorities on surface water drainage on applications for Major Development
- Powers to regulate Ordinary Watercourses under the Land Drainage Act 1991 including issuing consents for altering, removing, or replacing certain structures within ordinary watercourse and enforcing obligations to maintain flow and repair watercourse, bridges, culverts, and other structures within a watercourse.
- Powers to manage the risk of flooding from surface water, ordinary watercourses, and groundwater.

As a Highway Authority, LBS has responsibility for the provision and management of highway drainage assets for the proper function of the highway and safety of highway users. These responsibilities include the maintenance and operation of drainage gullies, connecting pipework to the public sewer system or other highway drainage assets.

Highway Authorities must also ensure that highway projects do not increase flood risk. These duties do not extend to Motorways and the Strategic Road network for which National Highways are the Highways Authority.

As a landowner, LBS has a responsibility to conduct maintenance on their assets, such as drain clearing, to prevent increased flood risk to neighbouring properties. They are also responsible for safeguarding their own land and property against flooding. As a riparian owner, Sutton has the responsibility of conducting maintenance tasks for the main rivers and ordinary watercourses that fall within Sutton-owned land.

3.1.2 Actions

LBS ensures all gullies are attempted to be cleaned every two years, with gullies on Reynolds Close and Mullards Close cleaned in March 2024.

During the event, LBS responded to reports of flooding, sending teams to clear gullies and trash screens in affected areas in the morning of 23rd. However this is unlikely to have had a significant impact due to the high river level preventing surface water sewers from draining.

After the event, they met with stakeholders including Residents and the Environment Agency on Jan 9th to determine the extent and possible cause of the flooding.

3.2 Environment Agency

3.2.1 Responsibilities

The Environment Agency (EA) is responsible for taking a strategic overview of the management of all sources of flooding. In addition, the EA also has operational responsibility for managing the risk of flooding from Main Rivers, Reservoirs, Estuaries, and the Sea, through surveying, maintenance and improvement works to main rivers and the sea.

Watercourses are defined in the Land Drainage Act 1991 as: all rivers and streams and all ditches, drains, cuts, culverts, dikes, sluices, sewers (other than public sewers within the meaning of the Water Industry Act 1991) and passages, through which water flows. Main Rivers are watercourses or rivers shown on the Main River Map and are designated as such by the EA. Main Rivers are usually larger watercourses or streams. Ordinary Watercourses are defined in the Land Drainage Act 1991 as watercourses that do not form part of a Main Rivers.

3.2.2 Actions

At 10:30 AM on 22nd September 2024, the Flood Forecasting Centre issued a Flood Guidance Statement, stating that there was a MEDIUM risk of flooding from rivers and surface water (Significant impact, low likelihood) for much of England and Wales. This was predicted to remain the same continuing to 23rd September. The expected risk of flooding from surface water was medium (significant impacts are probable) and from rivers it was low (possible but not expected). Despite the rising river levels, a Flood Warning was not issued to residents as it remained below the level at which property flooding is expected. This suggests that the current flood warning thresholds may underestimate the risk to properties in this area. The EA Flood Warning Service thresholds are set-up based on flood risk modelling, flood history and topographical survey information. In highly urbanised catchments, surface water interaction is also likely to impact the accuracy of the thresholds. Historic flood events help to check and improve their accuracy.

The Environment Agency have investigated their Flood Warning Service thresholds for the 23/09/2024 and note that the River Wandle level peaked above the Flood Alert threshold at the nearest telemetry gauge on Hackbridge Road. The flooding of low-lying land and roads was to be expected. However, no property flooding is expected at this level. A Flood Alert message was not issued as the flood event occurred overnight outside of normal hours (6am -9pm).

On the 23/09/2024, the level peaked below the Flood Warning threshold at 01:45 GMT and no Flood Warning message was issued as flooding to property was not expected. The telemetry located upstream (Beddington Park) and downstream (Watermeads) in the catchment also recorded river levels below the Flood Warning threshold.

Since the flooding, the EA have undertaken a survey and reviewed recorded flood levels in conjunction with the latest River Wandle modelling finalised in April and taken the decision to lower the flood warning service thresholds.

On 23rd September, after the flood event, the EA attended site and assessed the river to identify anything that may have impacted the flooding. Although nothing was identified, they requested a downed tree by Goat Bridge Wier to be removed and have since cleared some of the vegetation on the banks to prevent future issues.

An EA site meeting with residents from Mullards Close and LBS on 9th Jan 2025, suggested that water was not backing up through gullies and water entered properties from the sides rather than from below, implying that flooding was primarily caused by a combination of river overtopping and heavy rainfall creating significant overland flow. Recent modelling of the River Wandle identifies affected properties at Mullards Close and Reynolds Close as at risk of fluvial flooding.

3.3 Statutory Undertaker for Public Sewers (Thames Water Utilities Limited)

3.3.1 Responsibilities

The Statutory Undertaker for Public Sewers are responsible for the maintenance and operation of the public sewer network including those systems for surface water, foul water, and combined (surface and foul) water. They are also responsible for managing the risk of flooding from these systems. The Statutory Undertaker for Public Sewers within Sutton is Thames Water.

Thames Water use Impermeable Area Surveys, CCTV, flow monitors and manhole surveys to identify potential areas where water may be entering the network during wet winters or periods of high ground water. Thames Water may investigate internal property flooding due to the sewer networks.

It is likely that the drains feeding into the river are owned by Thames water.

3.3.2 Actions

Thames Water are not responsible for managing flood risk from the River Wandle. No known actions were taken in response to flood risk.

3.4 Riparian Landowners

3.4.1 Responsibilities

Private Landowners have responsibilities for the maintenance and upkeep of Main Rivers and Ordinary Watercourses, including for the bed/banks and any associated culverts or other structures within/adjacent to their land. The EA may however maintain some specific flood defences. Riparian Landowners should clear away debris from the watercourse or culvert even if it originated from outside their land.

3.4.2 Actions

Whilst vegetation was not identified as a significant contributor, it does have the potential to increase the severity of flooding or damage properties downstream if left unchecked. It is therefore important that all landowners monitor the riverbanks and clear debris away as necessary.

3.5 Residents and Property Owners

3.5.1 Responsibilities

Private Landowners have responsibilities for the maintenance and operation of drainage assets as well as connecting pipework located on privately owned land including building surface water drainage, privately owned roads and footways, car parks and other hard standing areas.

Residents and property owners who know they are at risk of flooding have responsibilities to mitigate the risk of flood damage to their property as far as is reasonably practicable. They should take measures to protect themselves and their property when flooding is imminent. Residents and property owners have the right to defend their property as long as they do not subsequently increase the risk of flooding to other properties.

3.5.2 Actions

Residents met with the EA and LBS on 9th January 2025, during which the airbricks were identified as a likely cause for water ingress to properties. The management company has agreed to install self-closing airbricks to improve property resilience.

3.6 Other Authorities

3.6.1 National Highways

National Highways is the Highways Authority for Motorways and the strategic road network with responsibility for the provision and management of highway drainage assets for the proper function of the highway and safety of highway users. Highway Authorities must also ensure that highway projects do not increase flood risk. The roads surrounding Mullards Close and Raynolds Close do not fall within National Highways responsibility.

3.6.2 Category One Responders

Category One Responders are organizations designated under the Civil Contingencies Act 2004 as having a primary role in emergency response and planning and are responsible for dealing with major incidents such as flooding. Firefighters and police officers attended the scene to support residents, as well as helping remove the stranded vehicle at Wallington Bridge.

4. Conclusions and Recommendations

4.1 Conclusions

On 23rd September 2024, heavy rainfall resulted in surface water and fluvial flooding in Mullards Close, Hackbridge, and Reynolds Close, Carshalton. A total of 35.51mm of rain fell between 00:00 and 04:00 GMT, with the Beddington rain gauge recording 58.2mm over 24 hours. This rainfall led to a rapid rise in river levels, with the Hackbridge gauge recording a peak of 2.04m at 2:45 GMT. Nine properties reported internal flooding, as well as a number of gardens.

The flooding caused significant disruption, with eight properties in Mullards Close and one property in Reynolds Close reporting internal flooding. Floodwater reached car hubcaps, and electricity was cut off in some flats due to water ingress. Emergency services also attended Wallington Bridge, where a vehicle was stranded in roadway flooding, with the road remaining closed until 02:00 GMT on 23rd September.

The flooding was primarily caused by a combination of surface water runoff, and river overtopping. As surface water accumulated, the River Wandle responded rapidly to the heavy rainfall and reached a peak level of 2.04m at 2:45 GMT, overtopping its banks. There are no flood defences between Mullards Close and the river, allowing water to spill directly into the surrounding low-lying areas. Vegetation along the riverbanks did not play a significant role in the flooding. The floodwater was observed entering properties through airbricks rather than backing up through internal drainage points such as showers, indicating that the flooding was primarily from external surface water and river sources rather than sewer surcharge or groundwater emergence.

The existing drainage network also played a role in exacerbating the flooding. Surface water sewers in the area discharge into the River Wandle, meaning that when the river was at a high level, these sewers could not effectively drain the surrounding area. This prolonged the presence of surface water, preventing it from dispersing through the drainage system.

Despite the rising river levels, the Environment Agency did not issue a Flood Warning for the event, as water levels remained below the modelled threshold for property flooding. The Flood Forecasting Centre issued a Flood Guidance Statement on 22nd September, warning of a medium risk of flooding from rivers and surface water. The River Wandle level peaked above the Flood Alert threshold at the nearest telemetry gauge on Hackbridge Road. The flooding of low-lying land and roads was to be expected. However, no property flooding is expected at this level. A Flood Alert message was not issued as the flood event occurred overnight outside of normal hours (6am -9pm). The level peaked below the Flood Warning threshold at 01:45 GMT and no Flood Warning message was issued as flooding to property was not expected. The telemetry located upstream (Beddington Park) and downstream (Watermeads) in the catchment also recorded river levels below the Flood Warning threshold.

However, given that properties did experience flooding, this suggests that current flood warning thresholds are set too high. Following the flooding, thresholds have been reviewed, and adjustments will be effective from the 9th July 2025.

4.2 Recommendations

To reduce the risk of future flooding in Mullards Close and Reynolds Close, a combination of property-level, drainage and river management measures should be considered. These

recommendations focus on mitigating surface water flood risk, improving river flood resilience, and ensuring warning systems accurately reflect flood risk.

A key measure that has already been identified is property-level resilience, specifically the installation of self-closing airbricks in affected properties. Discussions with residents and the management company responsible for the affected flats have highlighted that floodwater primarily entered properties through airbricks rather than from below, meaning that sealing these entry points with flood-resistant alternatives could significantly reduce the likelihood of future internal flooding. Furthermore, property level resilience is particularly suitable for short duration flood events such as the one on 23rd September where water levels receded before seepage could occur. The management company has agreed to install these measures.

Another consideration is raising the riverbanks along the River Wandle to provide better protection against overtopping during high-flow events. The Environment Agency should investigate the possibility of this and carefully assess the impact of alterations to riverbank levels, as raising the banks has the potential to increase flood risk downstream.

The Environment Agency should also consider the implementation of Natural Flood Management (NFM) or Green Infrastructure (GI) interventions upstream within the hydraulic catchment to attenuate flows and achieve wider environmental benefits.

The effectiveness of the flood warning system in this area should also be reviewed. The 23rd September 2024 event did not trigger a Flood Warning as the Hackbridge gauge did not reach the EA's property flooding threshold. However, given that internal flooding did occur, the EA should reassess the hydraulic model for this stretch of the River Wandle at this location and consider a lower warning threshold.

Finally, ongoing maintenance of riverbanks and drainage infrastructure should be prioritised. The EA has already taken steps to remove vegetation and the downed tree near Goat Bridge Weir, and continued monitoring will help prevent obstructions that could worsen flooding.

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It is the policy of Project Centre to supply Services that meet or exceed our clients' expectations of Quality and Service. To this end, the Company's Quality Management System (QMS) has been structured to encompass all aspects of the Company's activities including such areas as Sales, Design and Client Service.

By adopting our QMS on all aspects of the Company, Project Centre aims to achieve the following objectives:

- Ensure a clear understanding of customer requirements;
- Ensure projects are completed to programme and within budget;
- Improve productivity by having consistent procedures;
- Increase flexibility of staff and systems through the adoption of a common approach to staff appraisal and training;
- Continually improve the standard of service we provide internally and externally;
- Achieve continuous and appropriate improvement in all aspects of the company;

Our Quality Management Manual is supported by detailed operational documentation. These relate to codes of practice, technical specifications, work instructions, Key Performance Indicators, and other relevant documentation to form a working set of documents governing the required work practices throughout the Company.

All employees are trained to understand and discharge their individual responsibilities to ensure the effective operation of the Quality Management System.

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