

Made on behalf of Laffly LLP
Witness: Christopher David Brownhill
Number of Statement: 1
Dated: 03/03/15

**IN THE MATTER OF AN APPLICATION FOR A LAWFUL DEVELOPMENT CERTIFICATE
FOR AN EXISTING USE OR OPERATION UNDER SECTION 191 OF THE TOWN AND
COUNTY PLANNING ACT 1990**

AND IN THE MATTER OF LAND AT 150 HOLBORN, LONDON EC1N 2NS

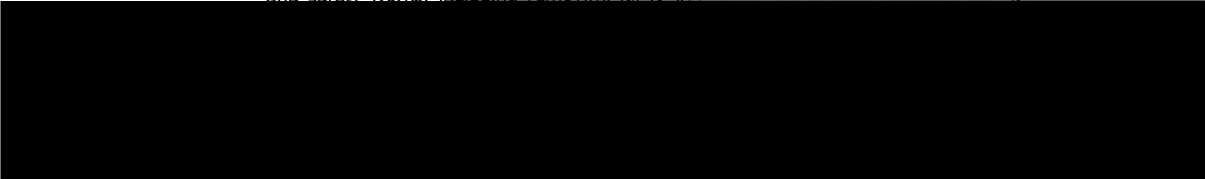
WITNESS STATEMENT OF Christopher David Brownhill

I, Christopher David Brownhill of Develop UK (Space) Limited will say as follows:-

1 INTRODUCTION

- 1.1 I am the Commercial Director of Develop UK (Space) Limited ("**Develop UK**") of Burdett House, 15 – 16 Buckingham Street, London WC2N 6DU. I joined Develop UK in January 2013 and have more than 25 years' experience in the development industry as a quantity surveyor.
- 1.2 Develop UK is part of a group of companies owned by parent company the DE Group (UK) Limited, which provides a suite of specialist services to the construction, rail and property development sectors. Other companies within the DE Group include Deconstruct (UK) Limited, Derisk (UK) Limited, Deploy UK Limited, Deploy (UK) Rail Limited, and Decontaminate (UK) Limited.
- 1.3 Except where I state to the contrary (in which case I give the source of information upon which I rely) I am able to state the matters in this witness statement from my own knowledge. Where matters are within my own knowledge these are true. Where matters are not within my own knowledge these are true to the best of my information and belief.
- 1.4 There is now produced and shown to me a bundle "Exhibit CB1" which I shall refer to by document number as follows "CB1/XX".
- 1.5 I make this statement in the context of Laffly LLP's application for a Lawful Development Certificate for an Existing Use or Operation under section 191 of the Town and Country Planning Act 1990 in relation to its development at 150 Holborn, London EC1N 2NS ("**150 Holborn**").
- 1.6 Laffly LLP own 150 Holborn which is managed by Ocubis.

2 DEVELOP UK'S INVOLVEMENT WITH THE DEVELOPMENT OF 150 HOLBORN

- 2.1 Develop UK first became involved with the development at 150 Holborn in the summer of 2014. Develop UK was initially instructed to carry out various health and safety works, including removing large quantities of rubble from the building
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- 2.2 Develop UK was later instructed, on 22 December 2014, in relation to the removal of roof plant.
- 2.3 I originally met with Stephen Chatfield (Development Director of Ocubis) onsite at 150 Holborn on 6 November 2014 (following an email request on 4 November), to discuss the removal of all external and internal roof plant. Develop UK provided a quote for the works to remove the external and internal roof plant, as discussed, on 20 November 2014 [Quote at CB/01].
- 2.4 Following further discussions with Stephen Chatfield, it was agreed that Develop UK would remove external roof plant only. A revised quote for the work was provided on 28 November 2014 [Quote at CB/02].
- 2.5 Minor revisions were subsequently made to the price for the roof works and an updated quote was provided on 22 December 2014 [Quote at CB/03]. Develop UK was instructed to carry out the works on the same day by email [Email at CB/04].

3 DEVELOP UK'S INVOLVEMENT PRE-DEVELOPMENT

- 3.1 Following earlier discussions with Stephen Chatfield, I drafted the construction management plan ("CMP") on behalf of Develop UK, which was submitted to Camden Council on 24 November 2014 by Gerald Eve [Cover Letter and CMP at CB/05]. The CMP provides an outline methodology for the removal of the roof plant, detailing the scope of the works, the management of the project, project resources, tenant and retail liaison plans, the proposed sequence of the works, information on the project programme, details about the crane to be used for plant lifting and the proposed logistics plan.
- 3.2 Following the submission of the CMP, on 3 December 2014, I attended a meeting at Camden Council's offices on behalf of Develop UK with Genny Fernandes and Anita Khan (of Camden Council), Stephen Chatfield, Jeremy Randall (Partner at Gerald Eve), and Adio Amusa (Director at AIA Consulting Ltd), to discuss various planning issues in relation to the development at 150 Holborn, including the Council's local labour requirements, and the CMP. The meeting was followed up by a note prepared by Deconstruct (UK) Limited ("Deconstruct") (as above, one of the companies in the DE Group) dated 11 December 2014, setting out what was agreed with Camden Council [Meeting Note at CB/06]. This was provided to and approved by Camden Council on 11 December 2014 (see attached Discharge Notice at CB/07).
- 3.3 On 8 December 2014, I met with Mike Pearce of Clarke Nicholls Marcel (civil and structural engineers) to discuss crane loadings in the courtyard.

4 ROOF PLANT WORKS

- 4.1 The de-planting works were carried out by Deconstruct with assistance from various specialised sub-contractors. Deconstruct is a leader in the sector of specialist demolition contracting, often working on complex projects with structural and logistical constraints. Deconstruct has extensive experience in all aspects of demolition including commercial, residential, industrial and retail space, which often includes retained facades or other parts of buildings.
- 4.2 My role on the project was as Project Director and I had overall responsibility for overseeing the execution of the project to remove the roof plant.
- 4.3 The scope of the works are detailed in the CMP [CB/05] as well as in the Roof Plant Removal Report by Watkins Payne [CB/08]. In summary, the works included the

removal of all external roof plant and equipment located on the existing roof plant areas. The plant to be removed included cooling towers, feeder tanks and air handling equipment with associated ducting, pipes, cabling, gantries and equipment. The plant was mainly located on two roof areas with some stand-alone split air-conditioning units located around the remaining roof area (see photographs in CMP at [CB/05]).

4.4 Site set up

- 4.4.1 Site set up commenced on 9 January 2015 when works were undertaken to set up temporary electrics on the roof. This involved using a step down transformer to reduce the power from 240 to 110 Volts. Two electricians were on site to carry out the works. Temporary lighting was also installed in the stairwell.
- 4.4.2 Following initial surveys of all external plant, isolation works were carried out. Steps were taken to ensure water and power were isolated and refrigerants were degassed. Strip out works were also undertaken. These works were carried out by [Mechanical Movements and Enabling Services Limited ("**Mechanical Movements**") and MAG Demolition Site Services (of M.A.G Properties Services Limited) ("**MAG Demolition**")] and took place between 13 and 16 January 2015. The works are detailed on the Work Record Sheet completed by Mechanical Movements [CB/09] and MAG Demolition [CB/10].

4.5 Back-propping of basement

- 4.5.1 A 70 tonne crane was to be positioned in the courtyard above the basement and it was considered that additional support for the basement would be necessary. Details of the crane are provided in the CMP [CB/05] and the position of the crane is illustrated on the Drawing at [CB/11]. The Lift Plan is appended at [CB/12].
- 4.5.2 Works were therefore undertaken (commencing on 12 January 2015) by two shuttering carpenters to back-prop the basement with titan propping (gas props). The back-propping works were designed by Ischebeck Titan Limited, who also provided the required kit (see Hire Delivery Note at [CB/13]). Overall, the construction and removal of the back-propping involved approximately 2 or 3 days' work. The completed back-propping is illustrated on page 8 of the photographs taken on 13 January 2015 [Photographs at CB/14].

4.6 De-planting

- 4.6.1 Approximately one and a half weeks were spent systematically dismantling the plant by cutting and preparing it for lifting off the roof. Pipe lagging was removed to allow for cutting of pipework and ductwork and stacks of plant were split into less bulky pieces. These works are detailed on the Work Record Sheet completed by Mechanical Movements [CB/09]. The dismantled plant was then craned down to the courtyard area onto lorries for removal from site.
- 4.6.2 Crane lifting was due to commence on 21 January but the crane that had been hired did not arrive on schedule as it was broken and an engineer was required to carry out repairs. This meant that lifting actually commenced on 23 January 2014. The crane arrived at 8am and a delivery of mats arrived on a separate lorry at approximately 9.00am. Four 5 x 1m wooden mats (150mm thick) were positioned on the outriggers of the crane with 22mm steel plates set on top to further spread the load of the crane.
- 4.6.3 After positioning the crane and the mats and rigging the crane, the lifting began at 10.30am. As above, details of the crane are provided in the CMP [CB/05].

4.6.4 Lifting works took two full days (10.30am – 4.30pm) on 23 and 26 January 2015 and the crane operations required at least three people at all times (1 slinger, 1 banksman and 1 crane driver). The lifts were not especially difficult but operations were slow as a result of the bulky nature of the roof plant being removed resulting in a need for further precision and caution.

4.6.5 Dismantled roof plant was loaded directly onto lorries to be transported to recycling facilities. Six lorry loads of metal waste were transported from the site. In addition, one skip load of general construction waste was transported to Westminster Waste Limited (at 38-40 Verney Road, London SE16 3DH) [see Delivery Note at CB/15].

4.7 **Resources**

4.7.1 At most there were 10 men onsite at any one time, but numbers varied from 2 to 10 people depending on the nature of the work on any given day. This included the following resources:

- (a) 2 electricians (required for the temporary electrical works and isolations);
- (b) 1 refrigerant engineer (required for degassing);
- (c) 1 plumber (required to check the water was isolated);
- (d) 2 shuttering carpenters (required to set up the back-propping of the basement);
- (e) 2 general skilled labourers (required to carry out general works on site);
- (f) 4 men to carry out the de-planting dismantling operations;
- (g) 4 crane lifters (included one appointed person responsible for the lifting operation (not necessarily onsite), one slinger (required on the roof to hook in the plant and guide the crane driver), one banksman (required on the ground to guide the crane driver in unloading), and one crane operator);
- (h) 1 project manager (Steve Dennington) (onsite at all times); and
- (i) Myself (both onsite and offsite).

4.7.2 Onsite attendance is detailed in the Site Attendance Register at [CB/16].

4.8 **Deliveries**

4.8.1 The works involved the following deliveries to and from the site:

- (a) Drop-off and collection of one yard skip (collected on 28 January 2015) (see Delivery Note at [CB/15]);
- (b) Drop-off and collection of back-props (delivered on 12 and collected on 30 January 2015) (see Delivery Note at [CB/13]);
- (c) Drop-off and collection of the crane (on each of 23 and 26 January 2015) (see Work Sheet at [CB/09]);

- (d) Drop-off and collection of equipment and tools (hired from 12 to 29 January 2014 (see Hire Delivery Note at [CB/17] and Hire Returns Note at [CB/18])).

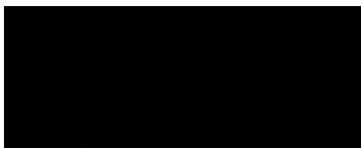
4.9 Additional and on-going works

- 4.9.1 The crane lifting works were completed on 26 January 2015. The site was then cleared and the back-propping was removed by 30 January 2015.
- 4.9.2 Since the completion of the de-planting works, Develop UK has continued to carry out works at 150 Holborn and is onsite approximately two days per week, usually with two men onsite. On-going works include installing floor lights, testing burglar alarms, fire alarms, sprinkler systems, dry risers, lightening conductors, and other general maintenance works. These works are detailed in the Work Record Sheet completed by MAG Demolition [CB/10] and the Work Record Sheet completed by Fireout Protection Limited [CB/19].
- 4.9.3 Develop UK has sent an application for payment to Laffly LLP that includes these additional works on 9 February 2015 [see Payment Application at CB/20].
- 4.9.4 Stephen Chatfield is our contact for this project and we anticipate that he will issue the certificate of completion of the de-planting and additional works in due course.

5 CONTEXT OF THE ROOF PLANT WORKS WITHIN THE OVERALL DEVELOPMENT OF 150 HOLBORN

- 5.1 The works carried out involved the removal of a substantial amount of plant and equipment, as is demonstrated by the time and resource that went into the project. To provide some context, whilst the cost of the works amounted to approximately £50,000, the cost of reinstating the same kit would amount to around £500,000.
- 5.2 In my professional experience, if we were instructed to deliver the entire project granted planning permission under reference 2011/4198/P, then the removal of the roof plant would be the first works we would ordinarily undertake if we were instructed to carry out a development project of this nature. In my view, the de-planting works formed the first (but important) step within the overall development of 150 Holborn. I consider it was right to carry out these works first as these formed the logical starting point for the development, and the completion of these works was essential to proceed to the next stage of the development (i.e. demolition of the roof level plant rooms and structural alterations to the concrete frame prior to the construction of the new 7th floor).

I believe that the facts stated in this witness statement are true.



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WITNESS STATEMENT OF Christopher David Brownhill

EXHIBIT CB1

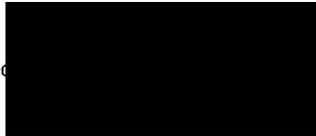
This is Exhibit marked "CB1" to the Witness Statement of CHRISTOPHER DAVID BROWNHILL

Contents

No.	Document
1	Develop UK Quote dated 20 November 2014
2	Develop UK Quote dated 28 November 2014
3	Develop UK Quote dated 22 December 2013
4	Email correspondence dated 22 December 2013 between Chris Brownhill and Stephen Chatfield detailing Develop UK's instructions from Ocubis to carry out de-planting works
5	Letter from Gerald Eve to Camden Council dated 24 November 2014 and Construction Management Plan dated
6	Meeting note prepared by Deconstruct UK dated 11 December 2014
7	Section 106 Discharge Notice dated 11 December 2014
8	Roof Plant Removal Report by Watkins Payne dated 11 November 2014

9	Mechanical Movements Work Record Sheets
10	MAG Demolition Work Record Sheets
11	Crane Location Sketch (Drawing Number MM..Develop)
12	Lift Plan for removing redundant plant by Mechanical Movements
13	Ischebeck Titan Hire Delivery Note dated 12 January 2015
14	Photographs taken onsite at 150 Holborn on 13 January 2015 and 21 January 2015
15	Westminster Waste Delivery Note dated 28 January 2015
16	Site Attendance Register dated 9 January 2015 – 6 February 2015
17	1 st Choice Tool & Plant Hire Hire Delivery Note dated 9 January 2015
18	GAP Group Plant & Tool Hire Hire Returns Note dated 27 January 2015
19	Fireout Protection Work Record Sheet dated 30 January 2015
20	Develop UK Payment Application dated 9 February 2015

Signed



CHRISTOPHER DAVID BROWNHILL

Date: 03/03/15