



**MIDDLESEX HOSPITAL ANNEX,
44 CLEVELAND STREET,
LONDON W1T 4JT**

Proposed Mixed Use Development

**Draft Construction Management Plan
On behalf of University College London
Hospitals Charity**

January 2017

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Proposed Mixed Use Development

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1 INTRODUCTION

- 1.1** Crosby Transport Planning is instructed by University College London Hospitals Charity (UCLHC) to prepare this draft Construction Management Plan (CMP) in respect of development proposals at Middlesex Hospital Annex, 44 Cleveland Street, London W1T 4JY, situated within the London Borough of Camden (LB Camden).
- 1.2** Middlesex Hospital Annex is a former University College of London Hospital NHS Trust building that was last in use for medical purposes in 2006 as an outpatient facility, comprising a total gross floor area of 6,815sqm (73,360sqft) of D1 use.
- 1.3** This report accompanies a detailed planning application for the redevelopment of the site to provide a mixed use scheme comprising 50 private/affordable residential units and 4,129sqm GIA (44,446sqft GIA) of B1a office space, with associated refuse and cycle stores and landscaping. It is proposed that the development will operate as 'car-free'.
- 1.4** This report has been prepared with reference to TfL's publication, '*Building a Better Future for Freight – Construction Logistics Plans*', *Camden Planning Guidance 6 'Amenity'* and relevant regional and local planning policies and guidance.
- 1.5** Pre-application discussions with LB Camden have indicated that a CMP is necessary and will need to be secured via a Section 106 Agreement, with a draft CMP to be submitted with the planning application.
- 1.6** Importantly, at the time of writing, the development's contractor has not been appointed and therefore this draft CMP sets out the measures that should form part of the final CMP and provides a preliminary assessment of the number, classification and timeframe for construction vehicle movements associated with the proposed development.

- 1.7** The applicant recognises TfL's requirement for the contractor to make reference to best practice and consideration will be given to those who are credited through the Freight Operator Recognition Scheme (FORS) and the Considerate Constructors Scheme (CCS).

2 POLICY CONTEXT AND GUIDANCE

Regional Policy

The London Plan – July 2011

2.1 Policy 6.14 (Freight) advises that at the strategic level the Mayor will work with all relevant partners to improve freight distribution. The Mayor supports the development of corridors to bypass London to relieve congestion.

2.2 In relation to planning decisions, the Mayor will seek to ensure that:

- Development proposals that: locate developments that generate high numbers of freight movements are close to major transport routes;
- Promote the uptake of the Freight Operators Recognition Scheme, Construction Logistics Plans and Delivery & Servicing Plans. These should be secured in line with the London Freight Plan and should be coordinated with Travel Plans; and
- Increase in the use of the Blue Ribbon Network for freight transport will be encouraged.

Local Policy

Local Development Framework – Camden Development Policies 2010-2025

2.3 LB Camden's Development Policies document supports the Core Strategy by setting out detailed planning criteria that the Council will use to determine applications for planning permission in the borough.

- 2.4** Policy DP20 (Movement of goods and materials) relates to developments that would generate significant movement of goods or materials both during construction and in operation and advises that the Council will expect such developments to minimise the movement of goods and materials by road, and consider alternatives such as rail and canal links. The Council will also expect such developments to be located close to the Transport for London Road Network (TLRN) or other major roads.
- 2.5** Policy DP21 (Development connecting to the highway network) seeks to guide all forms of transport to the appropriate parts of Camden’s road hierarchy. The roads considered to be most suitable for use by lorries and other heavy goods vehicles are those in the TLRN and others designated as Major Roads, including the Strategic Road Network (SRN). It is recognised that new development will not usually be directly accessible from these roads, however the minimal use of district and local roads is encouraged.

Camden Planning Guidance 6 (CPG6), Amenity

- 2.6** Section 8 of CPG6 contains guidance on how CMPs can be used to mitigate the potential impacts of the construction phase of a development. The expected contents of a full CMP are set out. The document states that a Section 106 Agreement will contain provisions setting out in detail the measures that the final version of the CMP should contain.
- 2.7** Notably, CPG6 states at paragraph 8.16 that the CMP should include the following statement:

“The agreed contents of the construction management plan must be complied with unless otherwise agreed with the Council. The project manager shall work with the Council to review this construction management plan if problems arise in relation to the construction of the development. Any future revised plan must be approved by the Council and complied with thereafter.”

London Freight Plan – November 2007

- 2.8** The London Freight Plan sets out the steps that have to be taken over the next five to ten years to identify and begin to address the challenge of delivering freight sustainability in London.
- 2.9** The Plan has no statutory force, but has been developed to implement the Mayor's Transport Strategy and is a material consideration for planning. The same principles underpin the Mayor's Transport Strategy.
- 2.10** The specific aims are to:
- Ensure that London's transport networks allow for the efficient and reliable handling and distribution of freight and the provision of servicing in order to support London's economy;
 - Minimise the adverse environmental impact of freight transport and servicing in London;
 - Minimise the impact of congestion on the carriage of goods and provision of servicing; and
 - Foster a progressive shift of freight from road to more sustainable modes such as rail and water, where this is economical and practicable.
- 2.11** Four main projects have been identified to achieve the above objectives, which are 1) Freight Operator Recognition Scheme; 2) Delivery and Servicing Plans; 3) Construction Logistics Plans; and 4) Freight Information Portal. The London Freight Plan provides further details of these projects, of which the following points are relevant to construction matters.

Freight Operator Recognition Scheme (FORS)

2.12 The FORS is designed to encourage freight operators to take up green fleet management and the use of best practice and to increase the sustainability of London's freight distribution. The project has already been developed with trade union involvement and with close collaborative partnership to engage effectively with freight operators and facilitate the sharing of information.

2.13 Operators will join the scheme as members, with tiers of membership reflecting freight operator achievements. It will offer members incentives to increase the sustainability of their operations and to develop their skills, including best practice development for:

- Training to improve safety and reduce CO2 and emissions;
- Maintenance, to improve safety and reduce fuel consumption, CO2 and emissions;
- Management of road risk to improve safety, particularly for pedestrians and cyclists;
- Fuel efficiency, to save costs and reduce CO2 and emissions; and
- The use of low-carbon engine technologies such as hybrid and electric vehicles, hydrogen fuel cells and biofuels to reduce CO2 and emissions.

2.14 It will recognise legal compliance as the base 'bronze' level and promote the uptake of best practice covering fuel efficiency, alternative fuels and low carbon vehicles, management of road risk, legal record keeping and reducing penalty charge notices through the higher 'silver' and 'gold' levels. It will also recognise operator achievements with rewards that encourage operators to raise standards to reduce, in particular, CO2 emissions and collisions between heavy goods vehicles (HGVs) and cyclists.

- 2.15** Benefits will be developed recognising operator needs. These will include a subsidised training programme called London Freight Booster which will include an NVQ Level 2 qualification that supports the ongoing competencies requirements for drivers.
- 2.16** Members will also benefit from advice about fuel efficiency, Penalty Charge Notice (PCN) reduction, legal record keeping and the management of occupational road risks. Tailored action plans to help reduce collisions, emissions and costs will also be developed.
- 2.17** The project will set Freight Operator Recognition Scheme Standards, a quality benchmark for use by clients when awarding servicing, maintenance and supply contracts. This provides a simple way for clients to ensure the sustainable credentials of freight operators.

Construction Logistics Plans

- 2.18** These plans provide a framework to better manage all types of freight vehicle movement to and from construction sites. TfL's accompanying guidance document '*Building a better future for freight: Construction Logistics Plans*' sets out how CMPs can help freight vehicle movements be managed more effectively to reduce money and impacts on others. The guidance states that having a plan will improve the safety and reliability of deliveries to a site, reduce congestion and minimise the environmental impact.
- 2.19** Construction plans can benefit the developer and the local community by having the following advantages:-
- *“Reduced delivery costs and improved security.*
 - *More reliable deliveries, meaning less disruption to the business day.*
 - *Time saved by identifying unnecessary deliveries.*
 - *Less noise and intrusion.*

- *An opportunity to feed into a corporate social responsibility (CSR) programme and ensure your operations comply with health and safety legislation.”*

2.20 When developing a CLP, each plan needs to be tailored to a site’s requirements and should include consideration of where legal loading can take place, the use of more sustainable delivery methods and using freight operators who commit to best practice, for example by being a member of the FORS.

Freight Information Portal (FIP)

2.21 The FIP will offer London, for the first time, a single interface for information on freight between London’s public authorities and freight operators. It will enable the integration of systems and act as a single point of registration for deliveries in London.

2.22 The project aims to reduce operators’ administrative costs and improve access to freight journey planning in the Capital, to support improved operational efficiency, better driver behaviour and the use of alternative fuels (including bio-fuel) and low-carbon vehicles.

2.23 A range of systems and services will be made available to all, with opportunities for FORS members to promote fleet and freight vehicle operational efficiency and the uptake of best practice to reduce CO2 emissions and improve safety, particularly by highlighting what can be done to reduce collisions between HGV’s and cyclists. Key partners will be all those with data or systems affecting freight operators and deliveries in London.

3 DRAFT CONSTRUCTION MANAGEMENT PLAN

Site Location

3.1 The location of the application site in the context of its local setting is shown in **Figure 1**. The site is located along the eastern side of Cleveland Street which represents the Camden-Westminster local authority boundary.

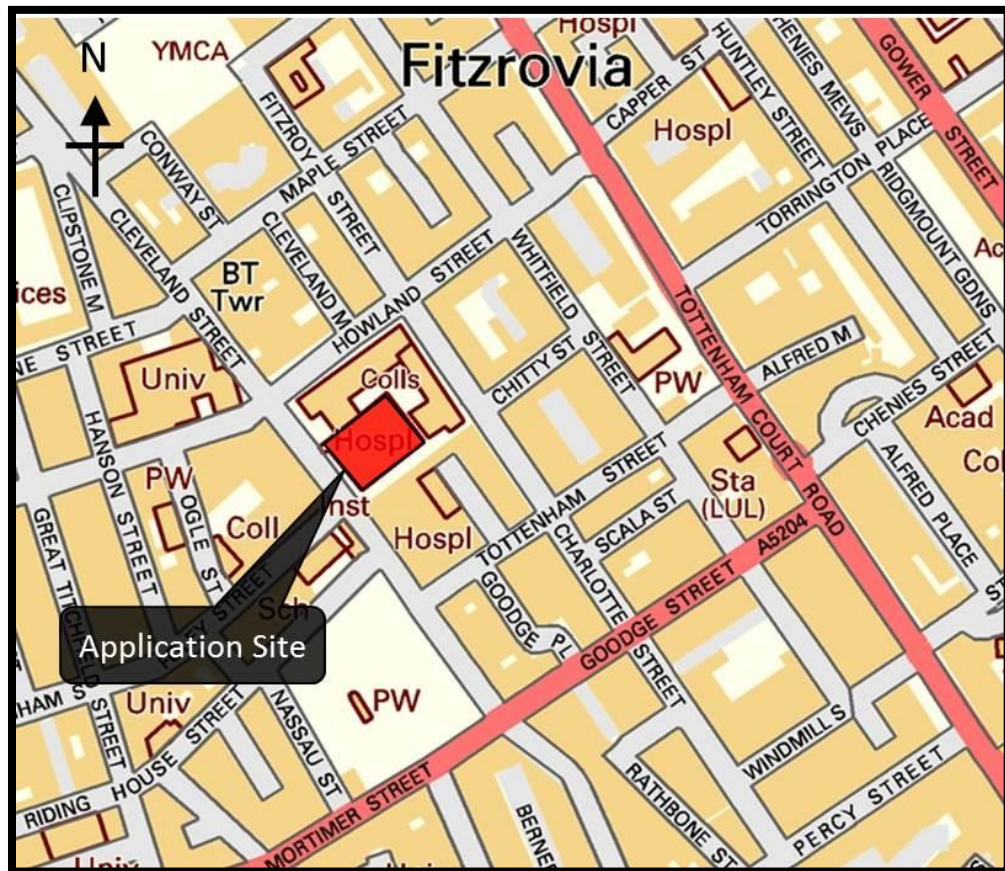


Figure 1: Site Location

- 3.2** The development site fronts onto Cleveland Street which is a 700 metre long one-way road that routes between the A5204 Mortimer Street to the south and the A501 Euston Road to the north. From its junction with Mortimer Street to the junction with Clipstone Street/Maple Street, Cleveland Street is one-way northbound. From its junction with Euston Road to Maple Street, Cleveland Street is one-way southbound, with all traffic turning eastbound onto Maple Street which continues eastbound to Tottenham Court Road.
- 3.3** In the vicinity of the site, between the junctions with Howland Street/New Cavendish Street and Foley Street, Cleveland Street is 5.5 metres in width, one-way, with street lighting and 2.5m-3.0m wide footways provided along both sides of the carriageway.
- 3.4** Directly along the site frontage onto Cleveland Street, a zebra crossing with associated zig-zag (no stopping at any time) road markings is located. To the north and south of the zebra crossing zig-zag markings, single yellow line parking restrictions are in place, between the hours of 08:30 to 20:30 Monday to Saturday. Along Tottenham Street to the south, on-street 'pay and display' parking bays with a maximum duration of stay of two hours, and 'resident permit holders only' parking bays which apply Monday to Saturday 08:30 to 18:30, are provided. Generally in the area, where parking bays are not located, there are single or double yellow line parking restrictions in force.
- 3.5** Directly opposite the site to the west, Foley Street forms a priority controlled junction with Cleveland Street. The exit from Foley Street is restricted to left-turn only by virtue of the one-way operation along both Foley Street and Cleveland Street.
- 3.6** Further afield, the A400 Tottenham Court Road forms part of the Strategic Road Network (SRN), for with LB Camden are the highway authority. The A400 Tottenham Court Road forms a junction with the A501 Euston Road which is classified as a red route forming part of the Transport for London Road Network (TLRN). The location of the site in the context of the wider highway network is shown in **Figure 2**.

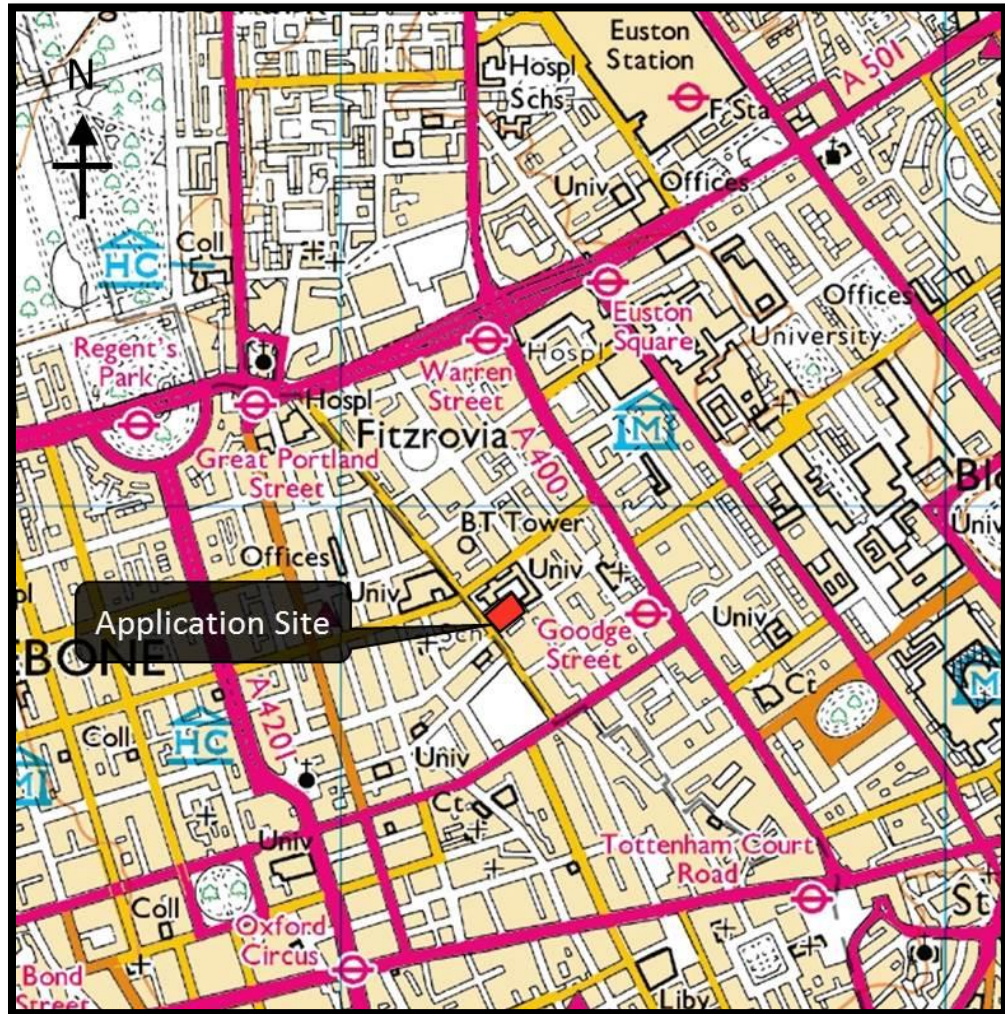


Figure 2: Surrounding Highway Network

Vehicular Access and Loading

- 3.7 Opportunities for access by construction traffic exist from the site's frontage onto Cleveland Street and it is envisaged that the all loading and unloading will be undertaken from this frontage.

- 3.8** The contractor will adhere to all local traffic management regulations when determining the access strategy to the site, although some traffic order suspension may be required along Cleveland Street to facilitate the manoeuvre of construction vehicles. Throughout any temporary closure of footways, an alternative segregated route for pedestrians should be implemented. These measures will be agreed with LB Camden prior to implementation.
- 3.9** Within the final CMP, the contractor will highlight the appropriate controls that will be put in place when vehicle loading/unloading is taking place, including any circumstances if/when a vehicle may be required to reverse to/from the development site on Cleveland Street. Such controls will include information relating to hoarding and gantry locations, the safe movement of pedestrians and the use of marshals and banksmen if and when vehicles need to reverse on the highway.
- 3.10** The main site accommodation and welfare area will be determined in conjunction with the appointed contractor. However it is anticipated that space within the North or South Houses will be made available during the construction period for these contractor facilities.
- 3.11** Subject to the construction programme and methodology, it should be practicable to deploy a tower crane within the site. The crane mast would be located centrally within the site to ensure sufficient coverage. Over-sailing agreements may be required subject to the type of crane to be used.
- 3.12** The appointed contractor will adopt a just-in time vehicle booking/management system, in order to carefully manage construction vehicle activity and avoid traffic congestion.
- 3.13** In order to minimise the impact of construction traffic, the contractor will aim to ensure that bulk transit trips such as waste collection vehicle movements and steelwork deliveries take place away from the traditional highway network peak times, which are 08:00-09:00hrs and 17:00-18:00hrs during weekdays.

Waste Disposal

3.14 The contractor will be required to provide a Site Waste Management Plan (SWMP) as part of their proposals. It is anticipated that the contractor will incorporate into their plan the use of waste removal systems. The contractor will be responsible for:

- Ensuring the site is kept clean and safe;
- The collection of waste from a central point; and
- Segregation of waste on site.

3.15 The contractor is to be aware of their responsibilities regarding waste disposal and recycling in terms of current legislation as well as the Employer's Requirements in relation to the BREEAM classification for the scheme.

3.16 As well as construction material waste the contractor will be responsible for excavation waste. The contractor will be required to grade all excavated material and reuse selected and appropriate excavated materials and aggregates for sub bases and the like where practicable.

Construction Programme

3.17 It is assumed at this stage that the development's construction programme will run for approximately 24 months. The programme will be developed in partnership with the appointed contractor.

3.18 It is likely that the impact of the programme of development will be at its most significant during the site's superstructure phases. Once these phases of work are complete and the internal fit out commences, the development's construction will have a reduced impact on the surrounding area.

Procurement

- 3.19** As a means to minimise the impact of construction vehicle movement, the appointed contractor will consider all vehicle activity associated with the site and appropriate measures to reduce its impact in conjunction with the procurement process.
- 3.20** Where practicable, the appointed contractor/sub-contractors will source items locally, and where possible amalgamate deliveries in order to reduce the overall number of vehicle movements taking place.

Promoting Sustainable Travel

- 3.21** The appointed contractor and sub-contractors will advise their staff of all local public transport connections and use reasonable endeavours to encourage travel to the development by sustainable modes.
- 3.22** Further information on public transport accessibility and pedestrian and cycle connections can be found within the Transport Assessment that forms part of the planning application. In relation to sustainable travel, the Transport Assessment concludes that the site is situated within a highly accessible location close to numerous public transport links and local amenities and is consequently considered to be very well connected by non-car modes of travel.

Hours of Construction

- 3.23** The hours of work are likely to be specified within planning conditions attached to the planning consent sought. It is anticipated that the standard hours of work would be as set out below:
- 08:00-18:00hrs Monday to Friday;
 - 08:00-13:00hrs Saturday; and
 - No working on Sunday and Bank Holidays.

3.24 Although work would not normally be permitted outside these hours, it is possible that certain works may have to be undertaken during these periods. If necessary, the hours of operation for such works would be subject to prior agreement and reasonable notice with LB Camden, except in emergency conditions.

Fumes and Dust

3.25 The appointed contractor will follow the London Councils' Best Practice Guidance *'The Control of Dust and Emissions from Construction and Demolition'* in order to limit disturbance from dust during construction and demolition.

3.26 A dust risk assessment has been undertaken as part of the Air Quality assessment prepared by Temple Group Ltd and submitted with the planning application. The report assesses the proposed development as having a medium risk for construction dust with the potential for occasional and minor impacts on nearby receptors. The assessment states that the following best practice mitigation measures should be included within the construction management plan:-

- Stakeholder engagement should be implemented through a stakeholder communication plan.
- The contact details for the individuals accountable for air quality and dust issues should be displayed at the site boundary.
- Complaints regarding air quality should be logged, and the log made available to the local authority on request.
- The site should be at least visually monitored for dust on a daily basis, with the frequency of monitoring increased during dry and windy conditions.
- The site should be organised so that:
 - physical barriers or screens are installed around the site to limit the dispersal of dust emissions; and

- loose materials are covered as soon as possible.

- Haul routes should be kept free from dust as far as possible, and swept regularly (water assisted). No dry sweeping of large areas will be carried out.
- Un-surfaced haul routes and working areas will be regularly damped down in dry conditions.
- All vehicles carrying loose or potentially dusty material to or from the working areas will be fully sheeted.
- Materials will not be burnt on site.
- Minimum drop heights will be used from conveyors, loading shovels and loading equipment.
- Provision of adequate water will be supplied to the working areas.
- Suitable dust suppression techniques such as water sprays or local extraction will be used when cutting, grinding or sawing materials onsite.
- Dust soiling checks at sensitive receptors and automatic monitoring of PM10 at the site boundary should be undertaken to ensure that the mitigation measures are being effective.
- PM10 concentration thresholds should be implemented at these locations, with exceedance alerts being sent to the individual responsible for air quality on the site. Where the site threshold is being significantly exceeded, work should cease on site until the source of the dust emissions is identified and negated.

3.27 The Air Quality assessment states that by putting these measures in place, dust emissions from site during construction will not be significant and impacts to sensitive receptors will be minimised or indeed removed.

Noise and Vibration Control

- 3.28** The appointed contractor will provide details of any necessary noise attenuation measures that may be required to ensure that noise and vibration is controlled and managed.

Considerate Constructors Scheme

- 3.29** The appointed contractor will be expected to sign up to the Considerate Constructors Scheme.

Other Development in the Vicinity

- 3.30** There may be other developments in the vicinity which may be under construction around the same time as Middlesex Hospital Annex. The contractor will adopt a precautionary and proactive approach to environmental management and will undertake a review of nearby sites and planning applications. Where necessary, the contractor will liaise closely with the relevant construction managers to ensure that any potential cumulative impacts due to construction vehicles are minimised, managed and mitigated as necessary.

4 CONSTRUCTION TRAFFIC MOVEMENTS

- 4.1 Whilst the CMP will seek to minimise the volume and impact of construction traffic movements, this section aims to provide an estimate of construction traffic movements associated with the proposed development.
- 4.2 Typically, the most effective estimates of construction traffic data are generated by the appointed contractor and these are often presented within a Construction Environmental Management Plan (CEMP), Method Statement or a CMP. Such documents can contain estimates of workforce movements to/from the site, deliveries to the site, removal of material from the site and trips made by associated trades.
- 4.3 However, for the purposes of a preliminary assessment, consideration has been given to the TRICS “Construction Traffic – Research Report” (February 2008) document which provides guidance on the number and classification of construction vehicles that we might expect in association with new build development. Consideration is also given to a possible route strategy for construction traffic.

Methodology

- 4.4 The amount of traffic associated with the construction phase(s) of the proposed development has been estimated based on the “Ready Reckoner” methodology provided within the TRICS “Construction Traffic – Research Report” document which states:

“Constructing Excellence recorded ‘Commercial Vehicle Movement KPI’ as part of the 2007 UK Construction Industry Key Performance Indicators. This uses a measure of the total number of commercial vehicle one-way movements onto a site (collected from security or other gate records, contractor notes and waste transfer notes) against the total project value. For inclusion, sites used in the assessment should be entirely non-operational, i.e. being constructed without any elements of the site being occupied which may skew the data...”

“Based on data collected in 2006, the total recorded movements onto a site per £100,000 of project value is 29.4 one-way trips (www.kpizone.com). For deliveries of materials, the indicator simply considers the final delivery journey to site, therefore not accounting for off-site storage, consolidation of loads or other factors”

Vehicle Classification

4.5 The TRICS “Construction Traffic – Research Report” states that:

“The varieties of activities that may take place during construction require the use of a wide range of vehicle types. These may be identified and grouped according to their size:

- *Car/pick up/3.5 ton van*
- *7.5 ton box van/panel van*
- *Low loader and articulated Heavy Goods Vehicle (HGV)*
- *Ready mix concrete truck*
- *Mobile crane*
- *Skip lorry*
- *32 ton tipper truck*

“The trips generated by each vehicle type are highly dependent upon the nature of the job.”

4.6 At this stage in the project, without an appointed contractor we can only undertake a preliminary estimate of the number and classification of vehicle movements that can be expected to and from the development site during the construction process, based on evidence collected elsewhere.

4.7 It is understood that the contract sum will be in the order of £32m. Therefore, based on the Ready Reckoner approach outlined, we might expect in the order of 9,408 one-way trips to take place associated with the development works.

4.8 In order to provide an approximate assessment of the associated vehicle classifications, proportions of construction traffic recorded during the ‘Highbury Redevelopment’ have been used. Based on the above, Table 4.1 below provides an estimate of the number of one-way movements undertaken by different construction vehicle classifications.

Vehicles	Car/pick up/3.5T Van	7.5T Box van/pane l Van	Low Loader & Artic	Ready Mix Concrete Truck	Mobile Crane	Skip Lorry	32T Tipper Truck
% of trips made by vehicle type (Highbury redevelopment)	10.44%	18.06%	2.38%	22.75%	0.05%	1.29%	45.03%
Predicted Number of trips – Middlesex Hospital Annex	982	1,699	224	2,140	5	121	4,236

Table 4.1: Preliminary Estimate of Construction Vehicle Numbers and Vehicle Classification

4.9 The table shows that approximately 6,726 of the total one way movements could be considered as HGV movements (71.5%).

4.10 If doubled, the total number of trips (i.e. arrivals and departures) would be 18,816, including 13,452 trips which could be considered as HGV movements.

4.11 From the above data, we have sought to estimate the daily trips, assuming that all building works (and subsequent construction traffic movements) will be undertaken between 08:00-18:00hrs Monday to Friday and 08:00-13:00hrs Saturday, with no construction traffic movements taking place on Bank and Public Holidays. In summary it is assumed that the total construction vehicle movements in Table 4.1 will take place over approximately 24 months. Assuming 5.5 working days/week, this equates to approximately 570days.

4.12 It is recognised that there will be some variation in flow on a day to day basis and as different phases of the development take place, however on the basis of the above and a 24 month construction programme, we would expect an average of 12 one-way HGV trips or 24 two-way HGV trips to take place daily. This would equate to an average of no greater than 2 one-way HGV movements per hour.

4.13 It is acknowledged that these figures are indicative at this stage and could potentially represent an over-estimation of construction traffic movements. Once the contractor is appointed, more accurate information will be provided within the full CMP.

Construction Traffic Vehicle Routing

4.14 The details of the proposed construction routing will be agreed with LB Camden and TfL prior to commencement of the construction works.

4.15 The site location in the context of the local road hierarchy is illustrated below.

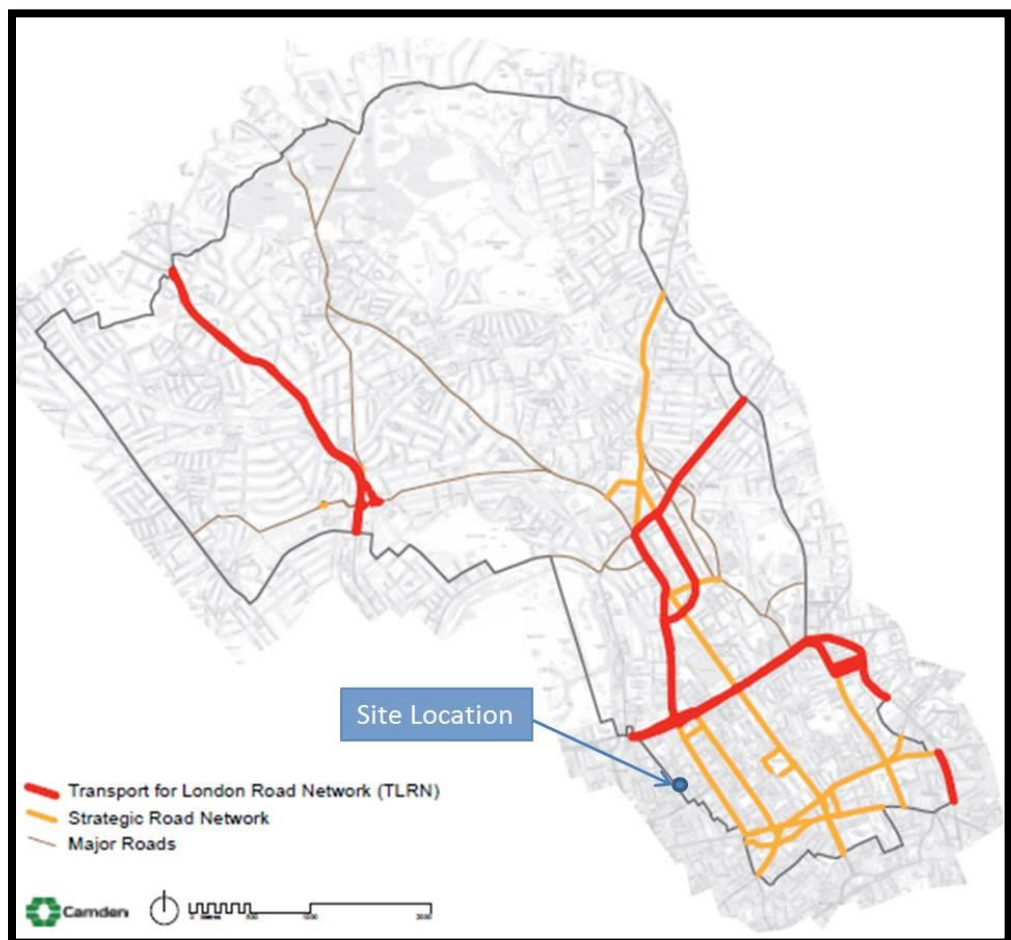


Figure 3: Local Road Hierarchy (extract from Camden Development Policies 2010-2025)

4.16 As described earlier, the site is located to the south of the A501 Euston Road which forms part of the TLRN; to the west of the A400 Tottenham Court Road which forms part of the SRN and to the north of the A5204 Mortimer Street/Goodge Street.

- 4.17** It is evident therefore that a routing strategy can be implemented that minimises impact on local roads surrounding the site, by utilising the TLRN, SRN and A-roads for the majority of the journey length and using only Cleveland Street and nearby roads for localised access.
- 4.18** Departing vehicles would route northbound via Cleveland Street and potentially via either Maple Street or New Cavendish Street, however full construction routing details will be provided by the contractor within the full CMP once the contractor has been appointed and materials/suppliers sourced.

5 SUMMARY

5.1 This draft Construction Management Plan has been prepared in respect of the proposed development of Middlesex Hospital Annex within the London Borough of Camden.

5.2 The draft CMP seeks to minimize the impact of construction vehicle movements, in line with guidance published by Transport for London in their document, *'Building a Better Future for Freight – Construction Logistics Plans'* and Camden's Planning Guidance CPG6 *'Amenity'*.

5.3 The draft CMP includes reference to:-

- A commitment to encouraging loading and unloading, and material storage to be undertaken without impact on the adjacent highway;
- Implementing appropriate controls for any circumstance if/when a vehicle will be required to reverse onto or off Cleveland Street;
- Adhering to local traffic management regulations;
- The timing of construction-related vehicle movements and mechanisms to encourage these vehicle movements to take place away from peak times of demand on the local highway;
- The appointed contractor to implement a vehicle booking/management system, in order to carefully manage construction vehicle activity;
- The implementation of a series of measures to mitigate against potential dust impacts on local receptors;
- The procurement process and how this can be used as a means to minimise the impact of construction vehicle movements; and
- Encouragement of contractor staff to access the development site via sustainable modes of travel.

- 5.4** It is envisaged that the development's construction programme will run for 24 months. During this time, in the order of 6,726 one-way HGV construction vehicle movements might be expected to be undertaken in association with development. It is envisaged that this would equate to approximately 12 one-way trips or 24 two-way trips to take place daily (on average) over the course of the total construction period.
- 5.5** Whilst a full CMP is to be secured via a S106 Agreement, this draft CMP demonstrates the client's commitment and ability to manage construction traffic activity efficiently and sustainably.