

## HNCC - CMP Collated Feedback

Item Nr	Feedback	Achievable	Added to CMP
1	<p>COVID-19 Implications As a general point, the CMP does not address how the operations will be carried out while complying with social distancing and other requirements as a result of the COVID-19 pandemic. The CMP should be updated to specify how those requirements will be satisfied.</p>	YES	<p>There is nowhere explicitly within the CMP where this can be added into however we are complying with all current Government Imposed Restrictions as well as latest CLC Guidance. Farrans also have their own</p>
2	<p>The Sustainability Statement for the project (in paragraph 4.15) requires the production of a Site Waste Management Strategy for all on-site activities to optimise materials resource efficiency. The CMP does not address this requirement.</p>	YES	<p>We will be producing a site Specific Site Waste Management Plan as well as an Environment Management Plan. These are 'live documents' which was audited on a monthly basis. Farrans has also ISO 14001 Environmental</p>
3	<p>This paragraph states that access will be via Bertram Street. As discussed at length at the Construction Working Group meeting on 25 November, Bertram Street is a narrow, cobbled residential road and totally inappropriate as the access for such a significant development, especially for heavy goods vehicle traffic. The recent severe damage to the road surface with attendant flooding underlines this point. See paragraph 18 below.</p>	NO Access is required via Bertram Street to complete the project	<p>It has been added in throughout the CMP we are utilising a one way system throughout the site. Refer to answer 18 within the CMP</p>
4	<p>In addition, we understand that the site compound will be located in the Gospel Hall in Winscombe Street and pedestrian access will be via Winscombe Street (see CMP paragraph 20a). This paragraph should explicitly state that vehicle access down Winscombe Street to the Gospel Hall will not be allowed.</p>	YES However smaller vans will be required to deliver office supplies	<p>Noted within answer 20 of CMP however a small number of office deliveries will be required</p>

5	<p>The proposed working hours are too extensive for such a sensitive site and especially when lockdown (to a greater or lesser degree) is likely to be continuing or older or vulnerable residents may be isolating in the area. During demolition the hours were 8 am to 5 pm and working on weekends was exceptional; the hours for the construction phase should not be longer.</p>	NO	<p>Noted within answer 9 of the CMP but all site hours are complying with planning and Camden's standard working hours</p>
6	<p>In addition, it is not clear how these hours relate to the restrictions during school times. Having a significant number of trucks in motion during the hours when schools are opening or closing for the day would be highly dangerous to the numerous children, families and young people walking, cycling, or getting out of vehicles in the area. The increase in traffic in peak hours would be intrusive in these narrow streets and there is an inevitable tension between buses and trucks on Chester Road and Raydon Street.</p>	YES	<p>Noted within answer 19 of the CMP to take in the hours as approved by LBC</p>

7	In addition to residents, the consultation should include local community and amenity groups. The DPNF, for example, would expect to receive any consultation documents directly from the contractor or Camden. A list of such consultees should be set out.	YES	Noted within answer 12 A combined list of consultees to be issued by LBC
8	The DPNF should be included in the Construction Working Group (info@DPNF.org.uk). The frequency of newsletters should be specified. This should be no less frequently than monthly and whenever there is a material change in timings or activities. The reference to the first meeting of the CWG is unclear; this appears to be a reference to the first meeting held with the Demolition Contractor. As far as we are aware the first meeting of the CWG with the Construction Contractor is the one held on 25 November 2020. Consultation over the DMP is not a substitute for consultation on the CMP.	NO	Noted in answer 12 of CMP Communications will be direct to the community groups on a monthly basis however the Newsletters will be issued quarterly
9	The plan should show a wider area, to include the route to/from the Strategic Road Network.	NO	We are following Compliance within the CMP and routes to and from the Strategic Road
10	We understand that the only access is planned to be via Chester Road and Bertram Street, with departing traffic turning left into Chester Road and then right into Raydon Street. We have serious concerns about the use of Bertram Street as the main access route. It is clear that Bertram Street is totally unsuited to the heavy vehicular traffic that will be necessary for the construction. As noted above, the recent severe damage to the cobbled road surface with attendant flooding underlines this point.	NO	Bertram Street will be the main access onto site however egress will be through Croftdown Road subject to the tree removal

<p>11</p>	<p>We understand that information submitted in support of the planning application indicated that temporary access would be made available from Croftdown Road during construction of the development, and a one way system would operate, with access from Bertram Street and exit onto Croftdown Road. We understand that the reason this was not implemented during demolition was that the existing buildings needed to be demolished first to make this route accessible, and it should now be possible to use this route. We have now been advised that Camden made a mistake in providing for this route at the planning stage. While an apology is welcome, it is not a substitute for sorting out this access issue. The alternative one way route would have the significant benefit of minimising the number of construction vehicles travelling to and from the site via Bertram Street. Given the constraints created by the Chester Road-Bertram Street-Raydon Street route (see below), the fragility of the Bertram Street road surface, and the requirement to widen the entrance to Bertram Street (see CMP paragraph 23), the CMP should explain in much greater detail why this route has not been and cannot be adopted. The CMP simply asserts that 'the location of an existing tree and the location of the proposed substation . . . would mean this location is not feasible', with no explanation of why that is the case. The existence of the tree certainly has been known throughout the development of this project. Moreover, Drawing D12 shows an exit onto Croftdown Road during Substructure Works, together with parking suspensions on Croftdown Road. It is not clear why a temporary exit throughout the works should be inhibited by the tree if a temporary exit during substructure works would not. Planning should also have taken the route into account in locating the substation. The contractor must work harder to find solutions to these issues, including the protection of the tree. We would welcome any of the possible solutions proposed by the contractor at the 25 November meeting, including adaptation of the scaffolding to allow vehicles through, use of a larger tower crane and use of a telehandler to move deliveries from Croftdown Road.</p>	<p>As per item 3 above</p>	<p>Bertram Street will be the main access onto site however egress will be through Croftdown Road subject to the tree removal</p>
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12	<p>More widely, the route proposed presents a number of issues. Chester Road is a busy narrow one way (up to the library) bus route. Bertram Street is an even narrower residential two-way street, while Raydon Street is also a narrow busy bus route. Given the constraints created by Chester Road, Bertram Street and Raydon Street and given the anticipated number of vehicle movements per day (up to 15 HGV movements), there is the potential for significant disruption and delay to local traffic. This will be exacerbated if, as seems possible, there will be construction at the 2 Chester Road site at the same time. There have been many instances when badly parked cars, wider vans, or large trucks (especially in the pull in area by the NISA shop) have caused the bus to stop and call the emergency number. In some cases this hold up lasts for hours. It is also important to take into account that the residents of Bertram St require refuse collection and perhaps emergency services or disabled vehicle access, while the 20 plus extra- large refuse bins for the Whittington Estate are collected by Veolia trucks which can also block Raydon St. The CMP should set out in detail how these constraints would be managed if this route were used, and in particular how the site traffic would interact with buses on the route and with construction traffic at the 2 Chester Road site.</p>	NO	<p>This was monitored during the Demolition Phase and was found to be negatable. The traffic movements will not be impacted and no additional traffic marshals will be required at the junction of Raydon Street</p>
13	<p>In addition, we understand from the plan in this paragraph (red arrow) and further plans provided that it is intended that larger vehicles will back down Bertram Street. The manoeuvring required to carry out such an operation would be extremely disruptive to traffic and dangerous for pedestrians and cyclists. Rather, the CMP pro forma requires the routes to be suitable for the size of vehicles that are to be used. If necessary, the contractor should use smaller vehicles appropriate for this constrained access route. In making that determination, regard should also be had to the necessity to avoid damage to the cobbles and trees in Bertram St; the cobbles have already suffered serious damage as a result of the demolition activities. The contractor should specify how that damage will be mitigated and additional damage prevented.</p>	YES	<p>Noted within answer 18 of the CMP. With the one way system through the site this will minimise this however larger vehicles may have to reverse down Bertram Street. If and when this is the case we will have a number of banksmen who will manage this along with our Logistics Manager</p>

14	<p>There should also be provision here for frequent reminders to Suppliers of the route. In addition to sending away Suppliers not using the approved route, those routinely breaching the requirement should not be allowed to supply the site. This paragraph should also expressly prohibit the waiting of vehicles in Chester Road or Bertram Street.</p>	YES	<p>Noted in answer 19d of the CMP which will be outlined further within supplier and subcontractor documentation</p>
15	<p>This paragraph also refers to the 'above hours' when vehicles will be sent away during school hours, but does not specify what those hours are.</p>	YES	<p>Noted within answer 19 of the CMP to take in the hours as approved by LBC</p>
16	<p>As noted above, HGVs reversing down Bertram Street is dangerous and disruptive. Vehicles suited to the constraints of the site should be used, and every effort should be made to minimise the use of larger HGVs. Use of larger HGVs may be acceptable if they are required for a very limited number of movements (for example, for steel units that are too large for any other vehicle), but in this case there should be a greater number of traffic marshals (including one walking with the vehicle) to ensure safety of pedestrians and cyclists and to minimise disruption to traffic. The estimated number, timing and duration of any such movements should be specified and updated regularly. In addition, the estimated number, location, timing and duration of parking bay suspensions should be specified.</p>	YES	<p>Noted within answer 18 of the CMP.</p>

17	Again it should be specified that no waiting will be allowed in Chester Road or Bertram Street.	YES	Noted within answer 19d of the CMP.
18	We suggest that traffic marshals are also provided at the corner of Chester Road and Raydon Street and at the top of Chester Road; this is essential when movements of larger HGVs are taking place. There have in the past been significant issues with large vehicles turning into Chester Road and causing difficulties for other vehicles and pedestrians.	YES	Noted within answer 20b of the CMP.
19	Site Parking: This paragraph should prohibit operatives from parking in streets in the vicinity of the site.	YES	Noted in answer 21a of the CMP. We will reinforce this during site inductions and periodically remind operatives
20	21b Please see paragraph 20b.	YES	Noted in answer 21b of the CMP
21	Greater detail should be provided of the location, timing and duration of the parking suspensions anticipated for Chester Road and, in particular, Bertram Street. Drawing D12 shows parking suspensions in Croftdown Road during Substructure Works but no explanation is provided of when or why these are required or their duration. Details should also be provided of how the trees at the entrance to Bertram Street will be protected, especially in relation to the widening of the entrance. It appears from the swept path analysis for Large Articulated Lorries that they will travel over the area where the northern tree is located. How will the tree be protected? How will the widening be done? Is it limited to removal of the fencing, as referred to in CMP paragraph 24b? How and when will the entrance be reinstated?	YES	Noted in answer 23 and 24b of the CMP. The tree will be required to be removed and replaced once works are complete subject to agreement with LBC
22	Details should be provided of how the trees at the entrance to Bertram Street will be protected if it is necessary to remove the fencing. See paragraph 23 above.	N/A	Noted in 24b of th CMP. The tree will be required to be removed and replaced once works are complete subject

23	The paragraph should specify the maximum noise levels anticipated, not just the average.	YES	Noted in answer 30 of the CMP. Maximum noise to be 90 dB at 10m from the
24	Detail should be provided on how noise, vibration and dust on site will be monitored: number, location and specification of monitors; maximum acceptable noise and dust levels; whether monitoring is real time; if not, how frequently the output from monitors will be checked; by whom; by whom and when breaches of the maximum acceptable noise and dust levels will be identified; how and by whom activities on site will be suspended; how the incident will be investigated. Activity on site should be suspended until the incident has been investigated and appropriate remedial measures put in place.	YES	Noted in answer 35 of the CMP
25	38 See paragraph 35 above.	YES	N/A
26	18. <b>Traffic Routing</b> We are very disappointed that a decision has been taken for construction vehicles to enter <b>and</b> exit via Bertram Street. This conflicts with the reassurances given to residents during the Planning Application process that a temporary one-way system would be instituted during the construction. I participated in the recent on-line community consultation meeting and understood the technical constraints of a complete one way system and welcomed the council's apology for getting the original consultation wrong. I was also reassured that Farrans would review the proposal to consider whether smaller vehicles could use a one way system and exit into Croftdown Road. Also, to what extent the weight of construction vehicles could be reduced in light of 19 below. Please include this commitment in the revised CMP. Also, please provide an explanation to residents of the reasons why the change has been made and the mitigation you will be providing.	YES	It has been added in throughout the CMP we are utilising a one way system throughout the site. Refer to answer 18 of the CMP



27	<p><b>19. Control of site traffic</b> This proposes up to 15 HGVs per day. In practice this is potentially 30 HGV trips daily up and down Bertram Street. You are now aware of the serious damage to Bertram Street during the demolition phase. The cobbled street has sunk in various places and a major water leak and pavement damage occurred which may well have been caused by the heavy trucks. In light of this, a thorough survey should be undertaken by Farrans and the council's Highways Department on the capacity of Bertram Street to withstand further heavy vehicles. Further, that specific proposals and reassurances on this issue be submitted as part of the Planning Application process. Also, that a formal commitment is made to restore any damage to the pavement, trees and cobbled street.</p>	YES	<p>As per the previous Construction Working Group, LBC has committed to repair the street to what it was prior to the demolition works commencing. A condition survey will be completed prior to the works commencing. Bertram Street has been assessed by LBC and the street has been found to be adequate for these type of vehicle movements</p>
28	<p><b>20d - Site access and egress</b> Reference is made here that 'any mud or debris that might find their way onto the public highways will be removed by a dedicated member of the Contractor's staff.' This should be supplemented by a commitment to power wash the street and pavements wherever necessary.</p>	YES	<p>Noted in answer 20d oof the CMP. We will minimise all excess debris entering onto the main roads and is captured daily through our third party check sheets</p>
29	<p>Drawing <b>D12</b> Mention is made here of 'widening the junction of Bertram Street and Chester Road. Details should be provided in the text and a guarantee given that there will be no damage to the trees and the junction fully reinstated.</p>	NO	<p>Noted in 24b of th CMP. The tree will be required to be removed and replaced once works are complete subject</p>
30	<p>Piling and groundworks will produce considerable noise and vibration and will have to be monitored during the works.</p>	YES	<p>All works undertaken on site will require a site Specific Method Statement and Risk Assesment (RAMS). Once the piling subcontractor is appointed we will carry out a review of the RAMS. The monitors will be in</p>

31	Noise predictions should be submitted as part of the final CMP for the piling and groundworks operations in line with the guidance of BS 5228 to ensure noise and vibration emissions from the site are controlled	NO	The design of these elements have not been fully designed as yet therefore we cannot supply the noise predictions. They will however be within BS 5228 and as noted within answer
32	An adequate piling method statement should be stated within the CMP to ensure BMP is being employed	NO	As specified in Item 30 above. All works undertaken on site will require a site Specific Method Statement and Risk Assessment (RAMS). Once the piling subcontractor is appointed we will carry out a review of the RAMS. The monitors will be in
33	Use a one way in/other way out route for all vehicles small enough to pass	YES	This has been noted within the document throughout
34	Minimise the use of larger vehicles that cannot exit via Croftdown Rd using a range of strategies including redistribution of large loads onto smaller vehicles wherever possible	NO	Not noted within the CMP has this would not be possible
35	Use S106 commitment to repair Bertram Street to the condition prior to demolition activity including retention and repair of original cobbles (NO replacement with modern cobble equivalents)	YES	As per item 27 above LBC has committed to repair the street to what it was prior to the demolition works commencing. A condition survey will be completed prior to
36	Assessment of condition of Bertram Street and of properties along Bertram Street prior to commencement of construction work to provide accurate record of pre-construction condition and share these assessments with residents	YES	A condition survey will be undertaken prior to the main works commencing
37	Rectify problems identified around access to consultation survey documents etc (link on Camden website etc) so that all residents have easy options to submit their views before the close date	N/A	Confirmed with residents following the previous CWG there were no access issues

38	<p>All roads in Camden are rated to the maximum for a road vehicle in the UK unless there is a weight limit imposed. I can't say the same for utility plant beneath the surface. However it is not within highways remit to ensure that the plant is suitable for the heaviest vehicles. That responsibility rests with the utilities. Camden does not own the plant and therefore does not maintain it. If the utility concerned considers that the plant is fit for purpose and it breaks then it will be a matter between them and whoever they find has caused damage.</p>	YES	<p>We are currently liaising with all utility suppliers to ascertain the extent of their infrastructure.</p>
39	<p>Some of the tracking drawings are incomplete – these need to show the manoeuvre from the Chester/Bertram St junction. It's apparent that some of the vehicles will not be able to undertake this, particularly artic. As discussed, there needs to be some discussion around the sizes of vehicles that need to service the site, and whether there is any potential for materials/plant to be transferred to the site if the vehicle stops away from the site. It would also be good to explore the possibility of the Croftdown entrance, or at least using this as a possible route to transfer materials into the site if the vehicles remain on the carriageway.</p>	YES	<p>As per item 3 above we will be implementing a one way system through the site</p>
40	<p>This is generally OK but we would expect to see preventative dust suppression at all times, i.e. spraying/misting/dampening down throughout the year and not just when it's hot and dry. We'd also want to see the avoidance of large stockpiles altogether, and these should be dampened or covered at all times, not just when hot and dry. Please can you also confirm whether and how you will ensure you'll be able to maintain a sufficient water supply and pressure such that all areas of the site can be dampened as necessary? Finally, if you will be undertaking any crushing, sawing, drilling or other abrasive work (either at large scale or with hand tools) we'd expect to see directional water-based dust suppression or the use of vacuum dust extraction.</p>	YES	<p>Noted in answer 33 of the CMP with further information</p>

41	Please provide more detail of the wheel washing facilities you'll use – will these be operatives with pressure washers (minimum expectation) or will you be using a dip trough and rumble grid (preferable)?	YES	Noted in answer 34 of the CMP
42	This section relates to the site's Air Quality Dust Risk Assessment, not the monthly dust monitoring reports. Please append the AQDRA produced for the site works and refer to this in responding to Q36.	YES	An Air Quality Assessment has now been appended to the document and noted in answer 36 of the
43	Currently the CMP references the monthly dust monitoring report for September. Please review the GLA mitigation measures checklist (Appendix 7 in the SPG document) and confirm that all highly recommended measures will be utilised – you may wish to refer to these in responding to Q33.	YES	Clarified in answer 37 of CMP
44	Again, the current response just refers to the September monthly dust monitoring report. Please confirm the arrangements for the continuation of the existing real-time dust monitoring regime. You will need to continue to produce monthly dust monitoring reports like those produced to-date for the duration of the project, until practical completion. Failure to do so, or failure to adequately manage the air quality or dust impacts from activities on site (as indicated by the dust monitoring data) will lead to enforcement action.	YES	Clarified in answer 38 of the CMP
45	The site is not actually in the Central Activity Zone for construction machinery, how if you do utilise the higher standard of non-road mobile machinery (NRMM) mandated inside the CAZ then that would be commended and would certainly benefit air quality.	YES	Noted in answer 42 of the CMP as this was a typing error
46	The remaining answers to Q42 are acceptable.	N/A	N/A
47	I know it is a difficult site to access and there has been much local opposition from residents. I did ask that the Plane tree be preserved if possible and also that the cobbles in Bertram Street be protected during the works.	NO	Following on from the CWG guidance on traffic movements and further reviews, it was determined that the tree removal would be necessary to allow a one way path for construction

48	<p>I have read and commented upon the Arboricultural Report for the site and have contacted Nick Bell, the senior tree officer. I asked that the root protection area plans be followed during construction, as I am sure you will. I do appreciate your landscaping and tree work at the Parly/Wm Ellis site. I now live within 100 yards of the tree and have known it and the old community centre for over 50 years!</p>	N/A	<p>Due to the pending application for the tree removal, this feedback is no longer relevant.</p>
49	<p>I asked that if the tree cannot be saved, then its replacement planting should be part of a Community led project, involving local residents in particular, as well as stakeholders.</p>	YES	<p>concerned has subsequently been consulted with directly and a recommendation provided by the resident for a suitable replacement tree will be discussed with the councils tree officer. The replacement will also be discussed during the CWG meeting where all nearby residents and</p>