

Construction/ Demolition Management Plan

pro forma

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Revisions & additional material

Please list all iterations here:

Date	Version	Produced by
14/10/2021	01	Legendre UK
18/11/2021	02	Legendre UK
08/12/2021	03	Legendre UK
06/01/2022	04	Legendre UK
10/01/2022	05	Legendre UK
12/01/2022	06	Legendre UK

Additional sheets

Please note – the review process will be quicker if these are submitted as Word documents or searchable PDFs.

Date	Version	Produced by

TTO Application will be processed by Camden Council with an addendum document, which includes queries listed in the email between Legendre UK (Bart Ciurla) and Camden Council (Maxim Lyne) on the 11.02.22 at 00:10am, and any other supporting information necessary that still needs to be finalised.

Introduction

The purpose of the **Construction Management Plan (CMP)** is to help developers to minimise construction impacts, and relates to all construction activity both on and off site that impacts on the wider environment.

It is intended to be a live document whereby different stages will be completed and submitted for application as the development progresses.

The completed and signed CMP must address the way in which any impacts associated with the proposed works, and any cumulative impacts of other nearby construction sites, will be mitigated and managed. The level of detail required in a CMP will depend on the scale and nature of development. Further policy guidance is set out in Camden Planning Guidance **(CPG) 6: Amenity** and **(CPG) 8: Planning Obligations**.

This CMP follows the best practice guidelines as described in the [Construction Logistics and Community Safety \(CLOCS\)](#) Standard and the [Guide for Contractors Working in Camden](#).

Camden charges a [fee](#) for the review and ongoing monitoring of CMPs. This is calculated on an individual basis according to the predicted officer time required to manage this process for a given site.

The approved contents of this CMP must be complied with unless otherwise agreed with the Council in writing. The project manager shall work with the Council to review this CMP if problems arise during construction. Any future revised plan must also be approved by the Council and complied with thereafter.

It should be noted that any agreed CMP does not prejudice or override the need to obtain any separate consents or approvals such as road closures or hoarding licences.

If your scheme involves any demolition, you need to make an application to the Council's Building Control Service. Please complete the "[Demolition Notice](#)."

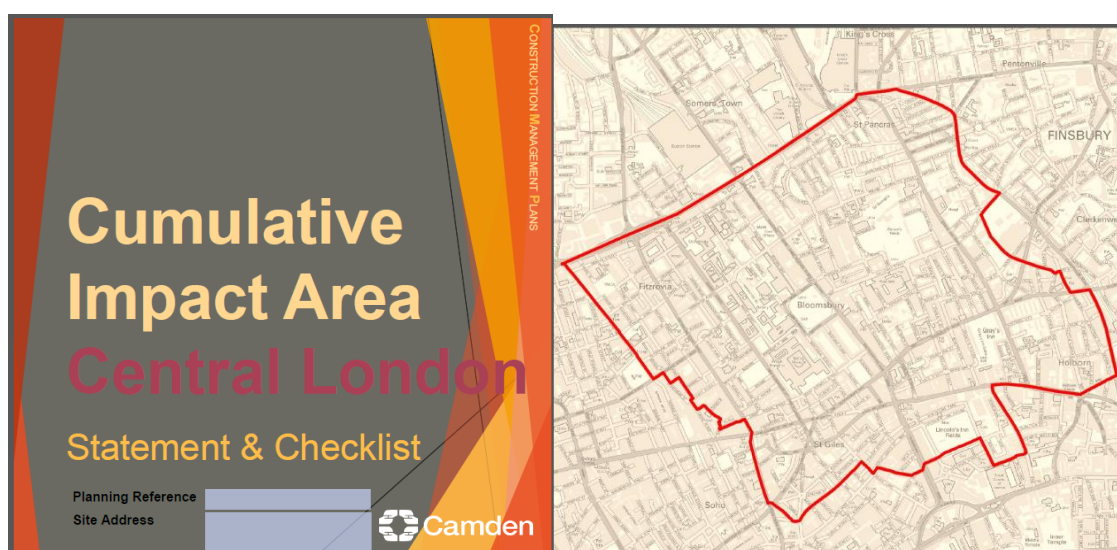
Please complete the questions below with additional sheets, drawings and plans as required. The boxes will expand to accommodate the information provided, so please provide as much information as is necessary. It is preferable if this document, and all additional documents, are completed electronically and submitted as Word files to allow comments to be easily documented. These should be clearly referenced/linked to from the CMP. Please only provide the information requested that is relevant to a particular section.

(Note the term 'vehicles' used in this document refers to all vehicles associated with the implementation of the development, e.g. demolition, site clearance, delivery of plant & materials, construction etc.)

Revisions to this document may take place periodically.

IMPORTANT NOTICE: If your site falls within a Cumulative Impact Area (as of 03/02/2020 to 03/08/2020 there is only one established CIA for the Central London area) you are required to complete the CIA Checklist and circulate as an appendix to the CMP and included as part of any public consultation – a CMP submission will not be accepted until evidence of this has been supplied.

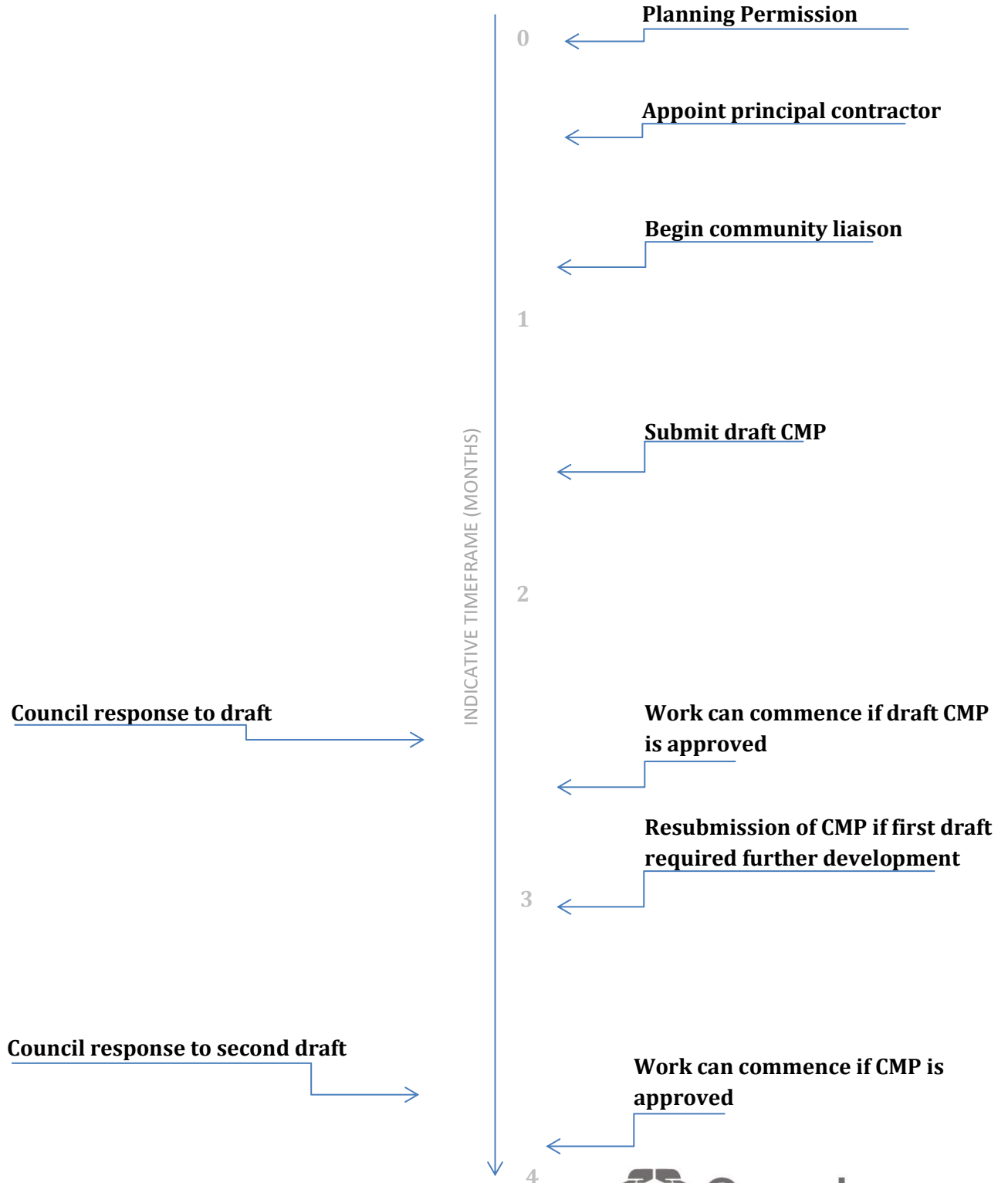
The CIA Checklist can be found at <https://www.camden.gov.uk/about-construction-management-plans>



Timeframe

COUNCIL ACTIONS

DEVELOPER ACTIONS



Contact

1. Please provide the full postal address of the site and the planning reference relating to the construction works.

Address:

60-72 Shorts Gardens & 14-16 Betterton Street, London, WC2H 9AU

Planning reference number to which the CMP applies: LBC 2017/2204/P

2. Please provide contact details for the person responsible for submitting the CMP.

Name: Mariyana Miteva

Address: 16 High Holborn, LONDON WC1V 6BX

Email: mariyana.miteva@groupe-legendre.com

Phone: 074 6917 5121

3. Please provide full contact details of the site project manager responsible for day-to-day management of the works and dealing with any complaints from local residents and businesses.

Name: Bart Ciurla

Address: 16 High Holborn, LONDON WC1V 6BX

Email: bartlomiej.ciurla@groupe-legendre.com

Phone: 0743 617 8255

4. Please provide full contact details of the person responsible for community liaison and dealing with any complaints from local residents and businesses if different from question 3. In the case of Community Investment Programme (CIP), please provide contact details of the Camden officer responsible.

Name: Bart Ciurla

Address: 16 High Holborn, LONDON WC1V 6BX

Email: bartlomiej.ciurla@groupe-legendre.com

Phone: 0743 617 8255

5. Please provide full contact details including the address where the main contractor accepts receipt of legal documents for the person responsible for the implementation of the CMP.

Name: Tanguy Plouy

Address: 16 High Holborn, LONDON WC1V 6BX

Email: tanguy.plouy@groupe-legendre.com

Phone: 07 799 369 709

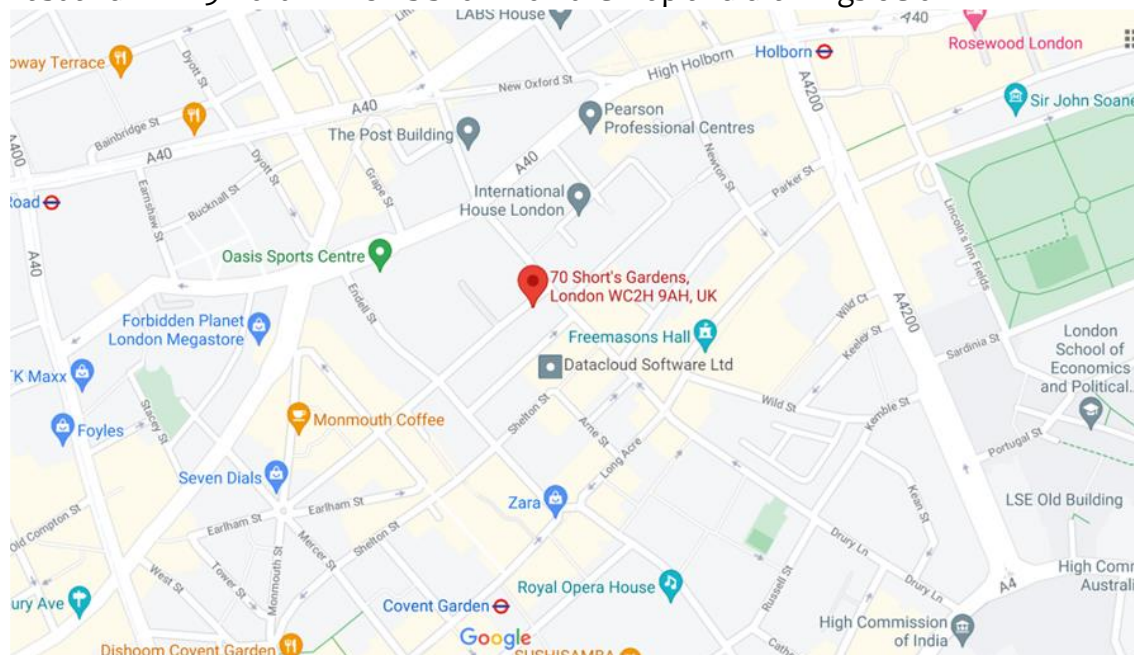
Site

6. Please provide a site location plan and a brief description of the site, surrounding area and development proposals for which the CMP applies.

The site is located in the London Borough of Camden within the area of Covent Garden on Short's Gardens, which is situated approximately 100 metres south-east of the A40 High Holborn / A40 / Shaftsbury Avenue junction.

The site is located on a rectangular block with frontages that occupy 60 - 70 Short's Gardens and 14- 16 Betterton Street. The site is within the Seven Dials Conservation Area, the London Suburbs Archaeological Priority Area and covered by the Crossrail safeguard route.

The exact location of the site is 60-72 Short's Gardens and 14-16 Betterton Street, Covent Garden, London, WC2H 9AH, on National Grid reference TQ302812, 530299 East and 181285 North which is shown on the map and drawings below.



7. Please provide a very brief description of the construction works including the size and nature of the development and details of the main issues and challenges (e.g. narrow streets, close proximity to residential dwellings etc).

The proposed works for Shorts Gardens Project include the refurbishment, extension and alteration of 60-70 Short's Gardens and 14-16 Betterton Street, including two storey roof extension to both properties and the installation of new mezzanine floors, refurbishment of vacant basements and the demolition and replacement of the redundant 'vent shaft' building to Short's Gardens, and façade towards the UKPN courtyard.

The project objective is to cut, carve and renovate the existing shell & core office space into a mixed-use development comprising a new and refurbished office space, retail space and provision for a restaurant / bar within a large currently unused basement. The scheme includes a two-storey rooftop extension to both Shorts Gardens and Betterton Street. The Betterton Street portion proposes four new apartments, three within an existing adjoining building 14-16 Betterton Street, the final located within the 2-storey roof extension. Associated refuse, cycle, plant and substation provision.

The project is situated within a busy area with numerous bus routes and underground stations. It is off the main roads, and we also identified few businesses that need to be considered for delivery schedules.

The nearest potential receptors likely to be affected by the activities on site (i.e. noise, vibration, dust, fumes, lighting etc) are:

- The Poetry Society
- Sutherland Labs
- The Hospital Club
- U.K. Power Networks
- The Travelodge Hotel
- Covent Garden Medical Centre
- Turtles Nursery

The main challenges we identified are:

- Safety of members of the public, construction staff and site visitors
- Management of deliveries due to the narrow roads serving the site
- Handling, hoisting and placement of construction components

8. Please provide the proposed start and end dates for each phase of construction as well as an overall programme timescale. (A Gantt chart with key tasks, durations and milestones would be ideal).

The works are planned to commence in October 2021 for a handover likely to be in Autumn 2023.

The likely programme of key activities is outlined in the table below. The development will likely be phased to assist the physical delivery.

Phase of Works	Duration
Enabling works/Surveys and Party wall awards	20 weeks
Site Set up <ul style="list-style-type: none"> Road closure / Hoarding Welfare and offices installation 	8 weeks
Crane and Hoist set ups – Lifting Operations	2 weeks
Foundations (West vent) and New Slab UKPN	19.5 weeks
Demolition and Structural Works – West vent	43 weeks
Demolition and Structural Works – Short’s Gardens	30 weeks
Demolition and Structural Works – UKPN	39 weeks
New roof structures – Short’s Garden	25 weeks
Demolition and Structural Works – Betterton	49 weeks
New roof structures – Betterton	7 weeks
Waterproofing and Roof works	39 weeks
Facades Works	56 weeks
Architectural Trades and MEP – Fit-out works	44 weeks
Lifts Works	20 weeks
Handover	90 weeks after Start on site

9. Please confirm the standard working hours for the site, noting that the standard working hours for construction sites in Camden are as follows:

- 8.00am to 6pm on Monday to Friday
- 8.00am to 1.00pm on Saturdays
- No working on Sundays or Public Holidays

In accordance with the London Borough of Camden's Minimum Requirements and Guide for Contractors Working in Camden, noisy building works can be carried between the hours below which would be the normal working hours of the site:

- Between 08:00 and 18:00 Monday to Friday
- Between 08:00 and 13:00 on Saturdays
- NO work on Sundays and Bank Holidays

Legendre UK understands that, as per London Borough of Camden Minimum Requirements, any noisy operations outside the standard hours cannot be undertaken without prior written approval of the Local Authority, and the permitted times of working may be reduced in the case of noisy schedules.

Legendre UK understands that, as per London Borough of Camden Guide for Contractors, the below activities are considered noisy activities. Therefore, such activities will be strictly restricted to the normal working hours (as above) in order to reduce noise nuisance to local residents and people who run businesses in the area, and to give them suitable breaks from noise and vibration.

- Erecting, constructing, altering, repairing and maintaining of any building, structure or road
- Breaking up, opening or digging under any road or nearby land in connection with carrying out, inspecting, maintaining or removing work
- Any demolition or dredging work
- Any engineering work (whether or not already covered in the three points above)

Community Liaison

A neighbourhood consultation process must have been undertaken prior to submission of the CMP first draft.

This consultation must relate to construction impacts and should take place following the granting of planning permission in the lead up to the submission of the CMP. A consultation process specifically relating to construction impacts must take place regardless of any prior consultations relating to planning matters. This consultation must include all of those individuals that stand to be affected by the proposed construction works. These individuals should be provided with a copy of the draft CMP, or a link to an online document. They should be given adequate time with which to respond to the draft CMP, and any subsequent amended drafts. Contact details which include a phone number and email address of the site manager should also be provided.

Significant time savings can be made by running an effective neighbourhood consultation process. This must be undertaken in the spirit of cooperation rather than one that is dictatorial and unsympathetic to the wellbeing of local residents and businesses.

These are most effective when initiated as early as possible and conducted in a manner that involves the local community. Involving locals in the discussion and decision making process helps with their understanding of what is being proposed in terms of the development process. **The consultation and discussion process should have already started, with the results incorporated into the CMP first draft submitted to the Council for discussion and sign off.** This communication should then be ongoing during the works, with neighbours and any community liaison groups being regularly updated with programmed works and any changes that may occur due to unforeseen circumstances through newsletters, emails and meetings.

Please note that for larger sites, details of a construction working group may be required as a separate S106 obligation. If this is necessary, it will be set out in the S106 Agreement as a separate requirement on the developer.

Cumulative impact

Sites located within high concentrations of construction activity that will attract large numbers of vehicle movements and/or generate significant sustained noise levels should consider establishing contact with other sites in the vicinity in order to manage these impacts.

The Council can advise on this if necessary.

10. Sensitive/affected receptors

Please identify the nearest potential receptors (dwellings, business, etc.) likely to be affected by the activities on site (i.e. noise, vibration, dust, fumes, lighting etc.).

A review of the land uses surrounding Shorts Gardens project has been undertaken to identify the nearest potential receptors likely to be affected by the activities on site, and to ensure that appropriate mitigation measures are implemented to minimise disruption. All adjacent properties will remain fully occupied and operational for the duration of the works. The nearest potential receptors likely to be affected by the activities on site (i.e. noise, vibration, dust, fumes, lighting etc) are:

- The Poetry Society
- Sutherland Labs
- The Hospital Club
- U.K. Power Networks
- The Travelodge Hotel
- Covent Garden Medical Centre
- Turtles Nursery

Four cycle stands at 60 - 70 Shorts Gardens, along the frontage of the site, will require relocation for the duration of the project. This will allow the site to be serviced. See proposed relocation below:



The closest underground line is the new Queen Elizabeth Crossrail tunnel which runs below the site development. It has been agreed with Crossrail that no new structure should go below 13.54 AOD. There are also maximum loadings permitted onto the existing basement slabs.

11. Consultation

The Council expects meaningful consultation. For large sites, this may mean two or more meetings with local residents **prior to submission of the first draft CMP**.

Evidence of who was consulted, how the consultation was conducted and a summary of the comments received in response to the consultation should be included. Details of meetings including minutes, lists of attendees etc. should be appended.

In response to the comments received, the CMP should then be amended where appropriate and, where not appropriate, a reason given. The revised CMP should also include a list of all the comments received. Developers are advised to check proposed approaches to consultation with the Council before carrying them out. If your site is on the boundary between boroughs then we would recommend contacting the relevant neighbouring planning authority.

Please provide details of consultation of draft CMP with local residents, businesses, local groups (e.g. residents/tenants and business associations) and Ward Councillors.

Legendre UK will undertake on-going communications with the local community throughout the construction period. These would include monthly Newsletters issued to the neighbours via e-mails and also displayed on the site hoarding, and weekly updates of the planned activities. Legendre UK will also operate open door policy and will welcome any local residents and businesses who would like to meet face to face and discuss concerns and/or suggestions. Legendre UK will have a Suggestion box displayed on the hoarding along with a Questionnaire which will be checked daily and acted on accordingly. This will enable the neighbours who might not be IT literate, such as the elderly, to have the opportunity to receive information that might concern them and respond back to us.

Initial consultation with the neighbourhood has already been arranged and completed in early May 2021 by another contractor, the result of this survey highlighted the following:

- *"My only concern is noise during meetings but if we can work with developers for an understanding that is fine."*
- *"We would appreciate it if work lorries and vehicles didn't park outside of our offices during the works as the thin windows allow for high levels of noise pollution."*

Legendre UK will take into account the concerns raised and ensure work does not cause unacceptable disturbance to the neighbours. Controls and mitigation measures will be put in place for dust, noise and vibration, such as install of solid hoarding, dust/noise/vibration monitors installed, noisy plant end equipment located away from site perimeter, use of acoustic screens, 5mph speed limit on site, switching off vehicle engines when loading/unloading, maintaining plant in good working order, etc.

On the 03.11.21 Legendre UK carried out a letter drop to all neighbours that stand to be affected by the proposed construction works. See below extract of the letter.

3rd November 2021

Dear Neighbour,

RE: 60-72 Shorts Garden and 14-16 Betterton Street, Holborn, London – Construction Management Plan [CMP]

We are pleased to announce that we have been awarded the role of main contractor to carry out the works at the above site on behalf of Span Group. The works include for the following:

- The refurbishment, extension and alteration of 60-70 Short Gardens and 14-16 Betterton Street.
- Two storey roof extension to both properties.
- Installation of new mezzanine floors.
- Refurbishment of vacant basements.
- Demolition and replacement of the redundant 'vent shaft' building to Shorts Gardens.
- Provision of mix of uses to 14-16 Betterton St including flexible retail and non-residential institution (A1/D1) at ground and ground floor mezzanine
- Four self-contained residential flats.
- Provision of mix of uses to 60-72 Shorts Gardens including flexible restricted D1/D2 and flexible A3/A4 at basement level.
- Flexible restricted D1/D2 at basement mezzanine, flexible B1 and restricted D1/D2 at ground and ground floor mezzanine and office (B1) at 1st – 4th floors. Associated refuse, cycle, plant and substation provision.

We draw your attention to our Construction Management Plan [CMP]. The CMP outlines the proposed building works to be undertaken and how the Legendre UK intends to manage the project to minimise the impact on the residents during the works. A summary of the key details is as per the below:

- The intended duration of the construction works – 108 weeks
- Working hours – 8am – 6pm Monday to Friday, Saturday 8.00am – 1pm
- Intended number of deliveries per day – (12). This may vary depending on the stage of construction; however, efforts will always be made to reduce peak hour deliveries – Refer to CMP for additional information.
- Complaints Helpline – Via shortsgardenscomments@groupe-legendre.com or 24/7 contact number (displayed on the site hoarding, once erected)
- Legendre UK will issue regular newsletters to the neighbours and will also have these displayed on the site hoarding.

Other items the CMP cover are:

- How the site will be access/serviced and how construction traffic will be managed.
- Procedures Legendre UK will enforce to reduce noise impact.

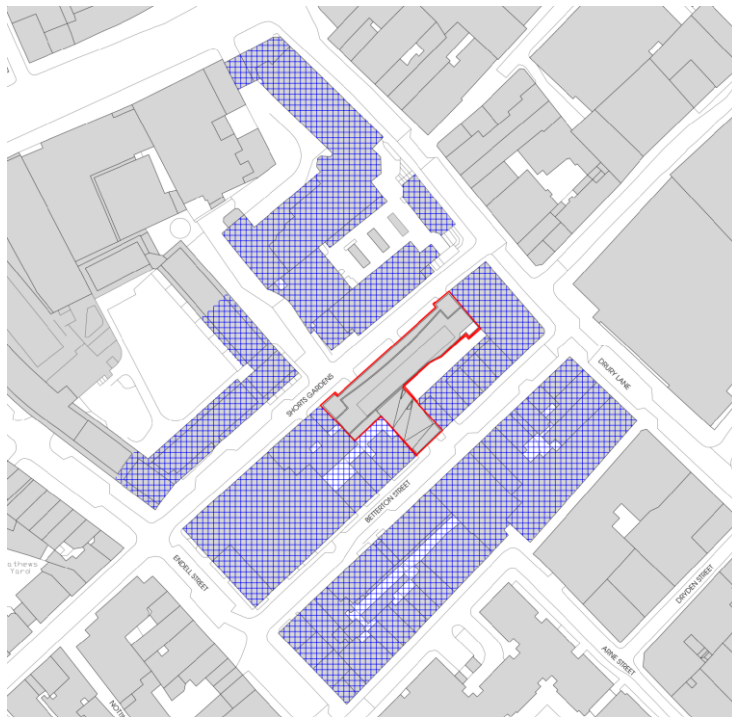
The full detailed CMP can be accessed via the following link <https://legendrebox-j-doc.com/s/B6mnpCnqRkM4iY> and we would be delighted to receive feedback regarding any concerns you have concerning [CMP] the refurbishment and alterations of the subject site. We would welcome feedback via email, shortsgardenscomments@groupe-legendre.com or by letter to the following address: Legendre UK, 16 High Holborn, WC1V 6BX, United Kingdom. Comments will be welcomed for a period of 14 days from the date this notice was written/issued, however, our project email will be maintained and monitored throughout the full duration of the project.

We hope the CMP addresses any concerns, however if you have any feedback/comments, please do not hesitate to contact us.

Yours sincerely,

 **LEGENDRE UK**

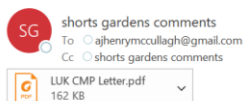
Please also see below mark-up which highlights the area where the letter was distributed to.



During the consultation period Legendre UK have received feedback from two neighbours, these included:

- a) When the letter was handed in directly on the 03.11.21 to the Travelodge Manager; we were requested by Travelodge to keep the footpath which runs along the Travelodge (Short's Gardens Road) unobstructed, in order to maintain wheelchair access to the building. Legendre UK have reassured Travelodge that the footpath will not be obstructed.
- b) On the 03.11.21 at 12.43pm we have received an email to the designated Short's Gardens communication address from a resident living in the Winter Gardens House. The resident has requested that Winter Gardens House is included in the communications related to this scheme. Legendre UK have replied to this requested on the 04.11.21 confirming that any further community liaison will also include the residents of Winter Gardens House. See below extract from the chain of emails.

RE: 60-72 Shorts Garden, 14-16 Betterton St



Reply Reply All Forward ...
Thu 04/11/2021 16:26

Good afternoon Henry,

Just picking up your email from yesterday.

Thank you for reaching to us via the designated communication channel.

We will make sure that your block will be included in the future correspondences; the aim of yesterday's letter was to each direct neighbours.

The letters were placed in letter boxes or handed in directly to shops and businesses, we cannot control what individuals do with those letters. We agree with you that leaving letters on the street would not serve their purpose.

Please see attached digital copy of the letter, should you wish to share it with your neighbours in the meantime.

Thanks and regards,

12. Construction Working Group

For particularly sensitive/contentious sites, or sites located in areas where there are high levels of construction activity, it may be necessary to set up a construction working group.

If so, please provide details of the group that will be set up, the contact details of the person responsible for community liaison and how this will be advertised to the local community, and how the community will be updated on the upcoming works i.e. in the form of a newsletter/letter drop, or weekly drop in sessions for residents.

Legendre UK will maintain a full-time site liaison contact for the public and the London Borough of Camden to enable them to obtain information, register a complaint or request action.

During the works, on-going communication with the neighbours will be maintained via notice boards and suggestion/feedback box displayed on the hoarding, and newsletters and e-mails sent to the local community (this will include any site close to the project). Legendre UK will also operate open door policy to enable anyone with concerns or suggestions to approach us.

Neighbours will also be specifically informed about any irregular work or road closures in advance of particular works that may cause disruption to residents, businesses or users of the local area. Legendre UK will endeavour to ensure that works do not unnecessarily cause disruption to the local community and will look to mitigate any adverse impacts.

A 24/7 contact number (usually Message Pad) and a project specific email address (shortsgardenscomments@groupe-legendre.com) will be implemented to receive formal complaints. These will be directed to the Project Director, The HSE Manager and the Project Management Team. These 24/7 contact number and email address, in addition to the site postal address, will be displayed on the site hoarding and published in the on-going communication to the neighbours.

In the event of a complaint from a neighbour or a member of the public in relation to any site activity, Legendre UK will record it in a complaints log, detailing the nature of the complaint, the cause and, where appropriate, the remedial action taken.

Legendre UK will contact all complainants for further discussion and identification of a mutually acceptable resolution if the problem persists. Where a valid grievance is raised, measures will be put in place, where practicable, to avoid recurrence of the complaint. Legendre UK will notify the Client as soon as practicable once a complaint has been received.

As part of the induction procedures, all site personnel will be made aware of the importance of maintaining good relations with the local community and neighbours.

All licenses issued will be displayed prominently on hoardings, scaffolds or fences.

13. Schemes

Please provide details of your Considerate Constructors Scheme (CCS) registration. Please note that Camden requires [enhanced CCS registration](#) that includes CLOCS monitoring. Please provide a CCS registration number that is specific to the above site.

Contractors will also be required to follow the [Guide for Contractors Working in Camden](#). Please confirm that you have read and understood this, and that you agree to abide by it.

Legendre UK is committed to improving the image of the construction by working closely with the local community. The company will register Shorts Gardens Project with the Considerate Constructors Scheme before the works start on site.

Legendre UK staff and Subcontractors will be briefed on Camden's Guide for Contractors and their responsibilities therein.

In accordance with the Considerate Constructors Scheme and section 1.3, table 1.1 (reproduced below) of the "Guide for Contractors Working in Camden", Legendre UK commits to working towards the standards outlined. Legendre UK will aim to achieve for the project an "Excellent" compliance level.

1	Considerate Consider the needs of everyone who is affected by the construction process and of its effect on the environment. You must give special attention to the needs of people with sight, hearing, or mobility difficulties.	2	Environment Be aware of the environment when choosing and using resources. You must pay particular attention managing waste, avoiding pollution, using local resources wherever possible, and keeping noise as low as possible.
3	Cleanliness Keep the site, footpaths and surrounding area affected by the work clear of mud, spillage, litter, and any unnecessary rubbish. Make sure that the site, hoardings, scaffolds, and other features are kept in a clean, tidy, and safe condition.	4	Good neighbour Consult with neighbours about site activity from before the work starts to the final handover. Provide site information and viewing facilities where practical.
5	Respectful Promote respectable and safe standards of behaviour and dress. You must not accept rudeness and must deal with poor behaviour using the strongest possible disciplinary action.	6	Safe Make sure all construction work and vehicle movements are carried out with care for the safety of passers-by, neighbours, and site personnel.
7	Responsible Be responsible for making sure everyone on site understands the scheme.	8	Accountable Be accountable (responsible for your actions) to the public by providing site contact details and being available to deal with their concerns and develop good local relations.

Legendre UK has registered Shorts Gardens project with the CCS scheme and the reg. No for the site is:

128863.

14. Neighbouring sites

Please provide a plan of existing or anticipated construction sites in the local area and please state how your CMP takes into consideration and mitigates the cumulative impacts of construction in the vicinity of the site. The council can advise on this if necessary.

There are no current adjacent construction sites which need to be taken into consideration at present.

Legendre UK will seek advice from Camden Council throughout the project for any future sites that may be planned.

Once established, the proposal will take on board all considerations to ensure site traffic creates the least impact. Keeping regular communication with any neighbouring sites, it will be the intention to form a working pattern that suits all parties.

Transport

This section must be completed in conjunction with your principal contractor. If one is not yet assigned, please leave the relevant sections blank until such time when one has been appointed.

Camden is a CLOCS Champion, and is committed to maximising road safety for Vulnerable Road Users (VRUs) as well as minimising negative environmental impacts created by motorised road traffic. As such, all vehicles and their drivers servicing construction sites within the borough are bound by the conditions laid out in the CLOCS Standard.

This section requires details of the way in which you intend to manage traffic servicing your site, including your road safety obligations with regard to VRU safety. It is your responsibility to ensure that your principal contractor is fully compliant with the terms laid out in the CLOCS Standard. It is your principal contractor's responsibility to ensure that all contractors and sub-contractors attending site are compliant with the terms laid out in the CLOCS Standard.

Checks of the proposed measures will be carried out by CCS monitors as part of your enhanced CCS site registration, and possibly council officers, to ensure compliance. Please refer to the CLOCS Standard when completing this section.

Please contact CLOCS@camden.gov.uk for further advice or guidance on any aspect of this section.

CLOCS Contractual Considerations

15. Name of Principal contractor:

LEGENDRE UK

16. Please submit the proposed method for checking operational, vehicle and driver compliance with the CLOCS Standard throughout the duration of the contract.

CLOCS compliance will be included as a contractual requirement with the minimum being FORS Silver accreditation, FORS Gold operators will be appointed where possible.

In order to ensure Legendre UK Subcontractors compliance with FORS and CLOCS written assurance will be sought from Contractors that all vehicles over 3.5t are equipped with additional safety equipment as per CLOCS Standard, and that all drivers servicing the site will have undertaken approved additional training covering the safety of vulnerable road users.

In addition, in order to fully comply with the CLOCS Standard, desktop checks will be carried out against the FORS database of trained drivers and accredited companies as outlined in the CLOCS Guide Managing Supplier Compliance. These desktop checks will be carried out as per a risk scale based on that outlined in the CLOCS Managing Supplier Compliance Guide.

Checks of FORS ID numbers will form part of the periodic site checks and will be carried out as per an appropriate risk scale.

Random spot checks will also be carried out by site staff on vehicles and drivers servicing the site at a frequency based on the aforementioned risk scale. These spot checks will include evidence of further training, license checks, evidence of routing information, and checks of vehicle safety equipment. Results from these checks will be logged and retained and enforced upon accordingly.

Collision reporting data will be requested from operators and acted upon when necessary.

17. Please confirm that you as the client/developer and your principal contractor have read and understood the CLOCS Standard and included it in your contracts.

I confirm that I have included the requirement to abide by the CLOCS Standard in my contracts to my contractors and suppliers:

Legendre UK confirms that the requirement to abide by the CLOCS Standard will be included as part of the Sub-contract Orders. Our contractors will be required to be FORS Silver registered as a minimum.

Please contact CLOCS@camden.gov.uk for further advice or guidance on any aspect of this section.

Site Traffic

Sections below shown in blue directly reference the CLOCS Standard requirements. The CLOCS Standard should be read in conjunction with this section.

18. Traffic routing: *“Clients shall ensure that a suitable, risk assessed vehicle route to the site is specified and that the route is communicated to all contractors and drivers. Clients shall make contractors and any other service suppliers aware that they are to use these routes at all times unless unavoidable diversions occur.” (P19, 3.4.5)*

Routes should be carefully considered and risk assessed, taking into account the need to avoid where possible any major cycle routes and trip generators such as schools, offices, stations, public buildings, museums etc.

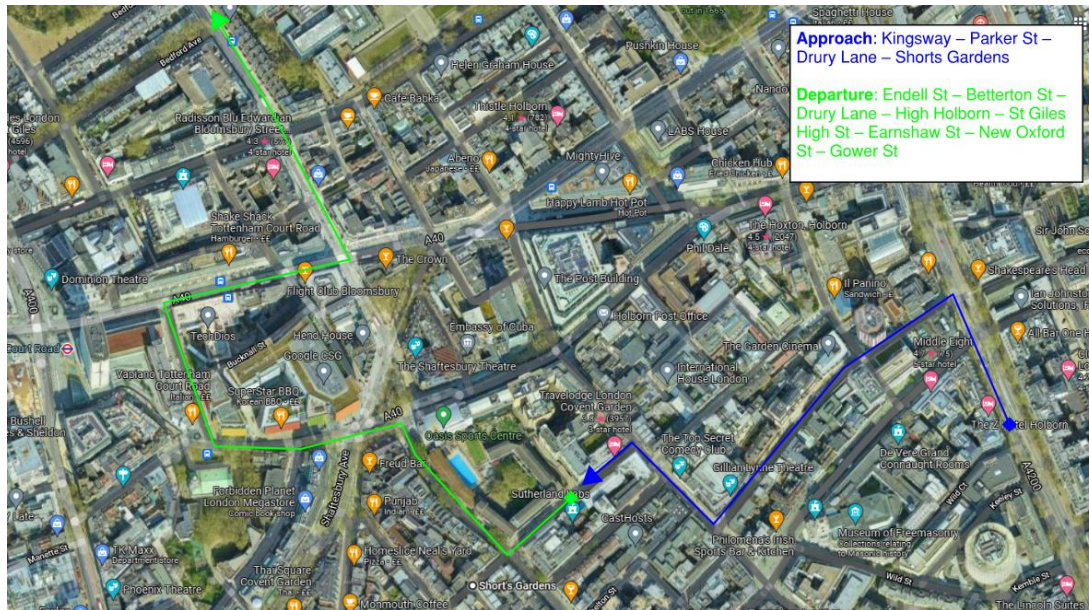
Consideration should also be given to weight restrictions, low bridges and cumulative impacts of construction (including neighbouring construction sites) on the public highway network. The route(s) to and from the site should be suitable for the size of vehicles that are to be used.

Please show vehicle approach and departure routes between the site and the Transport for London Road Network (TLRN). Please note that routes may differ for articulated and rigid HGVs.

Routes should be shown clearly on a map, with approach and departure routes clearly marked. If this is attached, use the following space to reference its location in the appendices.

Vehicle Access/Egress to and from the site shall be via Shorts Gardens.
 Pedestrian Access/Egress to and from the site shall be via Shorts Gardens.
 An additional gate on Betterton Street will be provided in case of emergency exit.

As proposed by the London Borough of Camden Principal Transport Planner, Legendre UK will apply to the Council for partial road closure of Shorts Gardens to ensure deliveries and unloading can be done in a safe environment, maintaining the works away from any member of the public.
 This also allow for an efficient one-way system, that will prevent any traffic jam at the entrance of the site.



Access and egress routes and the partial closure of the Short's Garden road can be found on the Site Installation Plan in Appendix 1

The site access and egress route has been dictated by traffic flow restrictions and road widths in the surrounding area. Access will be via Kingsway, Parker St, Drury Lane and onto Shorts Gardens.

It will be necessary to suspend/relocate on a day-by-day basis the Disabled car park space at the corner of Drury Lane and Short's Gardens Street to allow for mobile crane operations, these being to install the tower crane parts.

The road being shut, it will still allow for the two main access required to the Service Area: Exit route from the Travelodge bin collection and Entrance and Exit route for the bin truck of the Dudley Court bin collection and car parking.

The bin collection is not expected to be often (once a week for Dudley court and twice a day, usually one being out of hours for Travelodge)

There are also 5 car parking spaces that would remain available. In order to facilitate the exit, and considering the size of the vehicle involved, a small, materialised roundabout will be drawn in place in front of the entrance/exit of the service area.

b. Please confirm how contractors and delivery companies will be made aware of the route (to and from the site) and of any on-site restrictions, prior to undertaking journeys.

All Contractors, delivery companies and visitors will be made aware of the Traffic Management Plan (TMP) which will detail access/egress and delivery arrangement prior to starting on site and also during their site induction.

19. Control of site traffic, particularly at peak hours: *“Clients shall consider other options to plan and control vehicles and reduce peak hour deliveries” (P20, 3.4.6)*

Construction vehicle movements should be restricted to the hours of 9.30am to 4.30pm on weekdays and between 8.00am and 1.00pm on Saturdays. If there is a school in the vicinity of the site or on the proposed access and/or egress routes, then deliveries must be restricted to the hours of 9.30am and 3pm on weekdays during term time.

Vehicles may be permitted to arrive at site at 8.00am if they can be accommodated on site. Where this is the case they must then wait with their engines switched off.

A delivery plan should ensure that deliveries arrive at the correct part of site at the correct time. Instructions explaining such a plan should be sent to all suppliers and contractors.

Please provide details of the types of vehicles required to service the site and the approximate number of deliveries per day for each vehicle type during the various phases of the project.

For Example:

32t Tipper: 10 deliveries/day during first 4 weeks

Skip loader: 2 deliveries/week during first 10 weeks

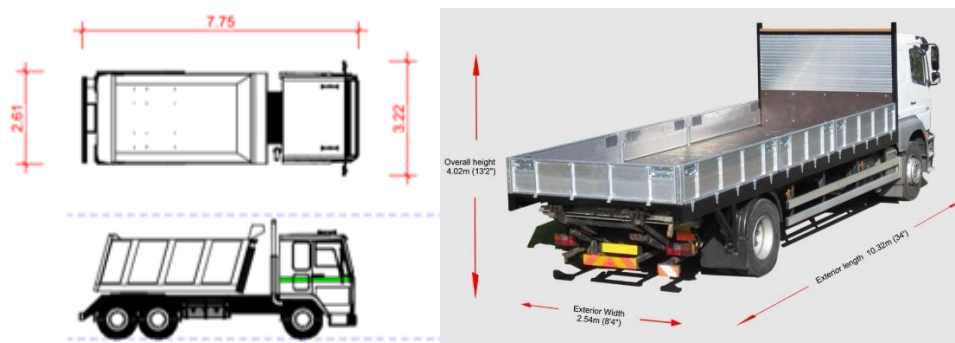
3.5t van: 2 deliveries/day for duration of project

In accordance with the London Borough of Camden's Minimum Requirements and Guide for Contractors Working in Camden, noisy building works, including site deliveries will be restricted to the following times:

- Between 08:00 and 18:00 Monday to Friday
- Between 08:00 and 13:00 on Saturdays
- NO work on Sundays and Bank Holidays

The typical size of vehicles is detailed below:

- Small lorries – 2 axles rigids: 3.22m wide (mirrors) / 2.61m, 7.75m long, 3.49 high, 25 tons gross weight when loaded (skips essentially)
- Other small lorries – 3 axles rigid: 3.22m wide (mirrors) / 2.54m, 10.32m long, 4.02m high, 7.5 to 25 tons gross weight when loaded



The frequency of vehicles coming on site will vary depending on the works happening at the time. The average of vehicles coming to site will be roughly 15 lorries per day during the demolition and structural works and 12 to 8 lorries per day during all the finishing phases.

It is envisaged that vehicles attending the site during the demolition and structural phase will generally be three axle rigid vehicles, followed by either two or three axle rigid vehicles during the finishing stages. It is not envisaged that standard articulated vehicles will be able to access the site.

It is envisaged that demolition materials will be stockpiled for removal such that there may be one vehicle every half an hour.

Concrete deliveries will be on an ad-hoc basis and on specific days, as part of an intensive pouring activity, the use of a pump may be considered with half an hour between deliveries. The unloading of steel sections could involve attendance on site for half a day. The construction team will review and schedule deliveries to suit the operation in hand and to ensure compliance with the loading restrictions. Where variation is required for specific operations, then this will be discussed with the relevant Camden department for authorization to be gained.

Deliveries will be planned to avoid peak traffic hours and school arrival/departure times, which are: between 08:00 -09:00, 15:00-16:00 and 17:00-18:00. All deliveries will be coordinated and planned at least 1 week prior and delivery schedules will be monitored daily by site management and traffic marshals. All deliveries will be coordinated using an online system – Biosite or equivalent.

b. Cumulative affects of construction traffic servicing multiple sites should be minimised where possible. Please provide details of other developments in the local area or on the route that might require deliveries coordination between two or more sites. This is particularly relevant for sites in very constrained locations.

The partial closure of Short's Gardens will allow for the two main access routes required to serve the area:

- Exit route from the Travelodge bin collection
- Entrance and Exit route for the bin truck of the Dudley Court bin collection

The bin collection is not expected to be too frequent.

Refuse collection – collections take place on Mondays, Wednesdays and Fridays generally between 8.00 – 8.30.

Our Swept paths page 65-66 of the CMP shows 3-axle lorries which are able to enter Short's Gardens from Endell St. If the refuse collection vehicle is unable to use this access we will accommodate other solutions, being drive through the pit lane or help with the bin collection.

Access for light vehicles to Dudley Court which is situated West from the Travelodge will be maintained using their car park.

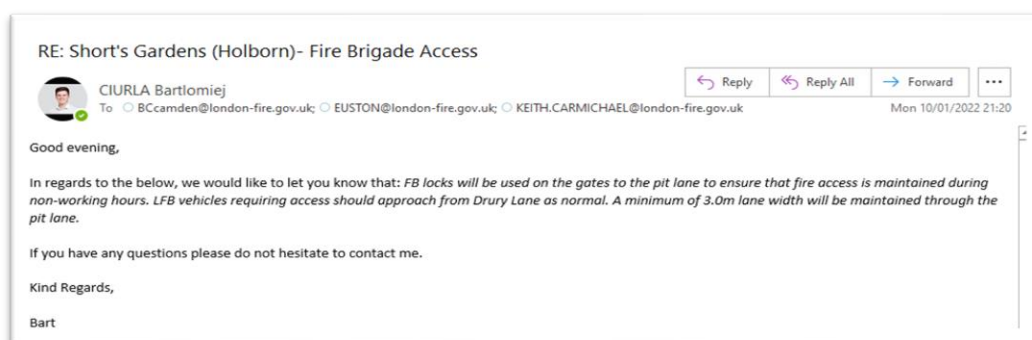
There is a gate at the end of the access route from Short's Gardens into Dudley Court that restricting access to a refuse yard (assumably belonging to the 174 High Holborn building - The Place)

Access for the refuse collection vehicles will be maintained to this refuse yard.

A floor marking in front of the access gate to Dudley Court states "No Parking Fire Access".

There are two options (as below) to allow access for the Fire Brigade to serve the whole street:

- Option 1 (Preferred) - Access to Dudley Court / The Place service yard.
Access for the Fire Brigade from North part of Endell Street, turn into Short's Gardens – reversing after the intervention is still possible
- Option 2 - Access to Travelodge façade or our Project
- Access for the Fire Brigade from Drury Lane (unchanged as per current set up) – FB locks will be used on the gates to the pit lane to ensure that fire access is maintained during non-working hours. LFB vehicles requiring access should approach from Drury Lane as normal. A minimum of 3.0m lane width will be maintained through the pit lane.



Legendre UK have approached Travelodge re: frequency of vehicle servicing the hotel and was advised of the below:

- The exit at the back of Travelodge onto Short's Gardens is used in a typical manner
- The bin lorries are coming out twice a day, usually with one of the trip out of hours, and there are the linen and food (1 instance per day at most) deliveries

The schedule for these can vary and could as well be out of hours.

Site Logistics Plan is available in Appendix 1.

Fire Engine access/egress route is available in Appendix 2.

Lorry Swept Path is available in Appendix 3.

Neighbouring Premises Plan is available in Appendix 4.

c. Please provide swept path analyses for constrained manoeuvres along the proposed route.

Please refer to Appendix 4.

d. Consideration should be given to the location of any necessary holding areas/waiting points for sites that can only accommodate one vehicle at a time/sites that are expected receive large numbers of deliveries. Vehicles must not queue or circulate on the public highway. Whilst deliveries should be given set times to arrive, dwell and depart, no undue time pressures should be placed upon the driver at any time.

Please identify the locations of any off-site holding areas or waiting points. This can be a section of single yellow line that will allow the vehicle to wait to phone the site to check that the delivery can be accommodated.

Please refer to question 24 if any parking bay suspensions will be required to provide a holding area.

The public highway outside the site will not be used for the loading or unloading of materials except with the express consent of the London Borough of Camden. Loading and offloading will be made within the hoarding limits. There will be no off-site holding area. As stated above, all deliveries will be controlled and allocated a delivery time slot to minimise disruption to traffic and queuing, such as deliveries taking place on a 'just in time' basis to limit waiting times.

e. Delivery numbers should be minimised where possible. Please investigate the use of construction material consolidation centres, and/or delivery by water/rail if appropriate.

As mentioned above, all deliveries will be coordinated and planned at least 1 week prior and delivery schedules will be monitored daily by site management and traffic marshals. All deliveries will be coordinated using an online system – Biosite or equivalent

f. Emissions from engine idling should be minimised where possible. Please provide details of measures that will be taken to reduce delivery vehicle engine idling, both on and off site (this does not apply to concrete mixers).

Delivery drivers will be required to switch their engines off whilst waiting for loading/unloading of their vehicles. This will be outlined in the Traffic Management Plan that will be distributed to all concerned, e.g. Suppliers, Sub-contractors will be covered in the Site Induction Training.

Further information:

- There will be two-way vehicle movement between the TL entrance and Endell St.
- Westbound contraflow cycle movement will be permitted on Betterton St.



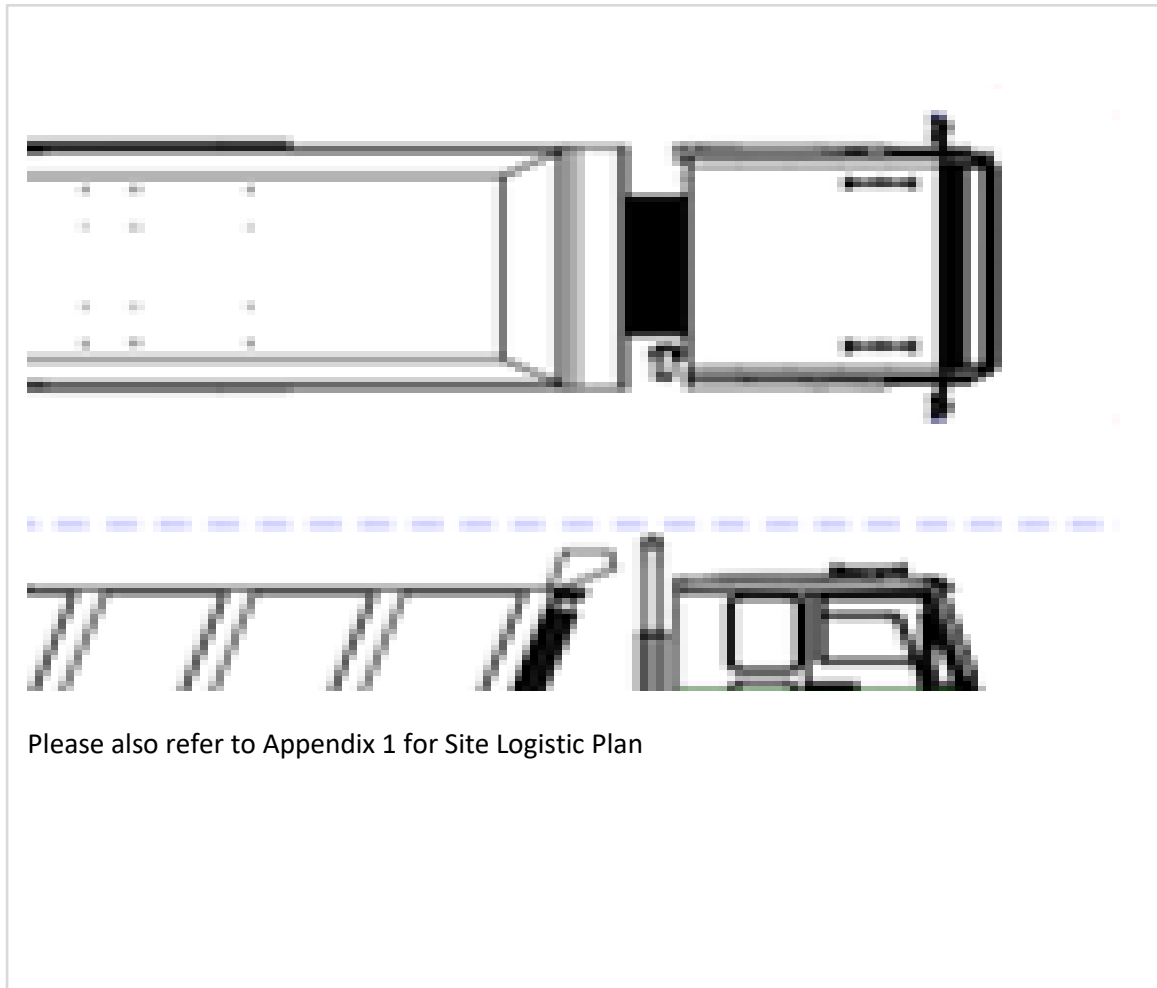
20. Site access and egress: *“Clients shall ensure that access to and egress from the site is appropriately managed, clearly marked, understood and clear of obstacles.” (P18, 3.4.3)*

This section is only relevant where vehicles will be entering the site. Where vehicles are to load from the highway, please skip this section and refer to Q23.

Vehicles entering and leaving the site should be carefully managed, using gates that are clearly marked and free from obstacles. Traffic marshals must ensure the safe passage of all traffic on the public highway, in particular pedestrians and cyclists, when vehicles are entering and leaving site, particularly if reversing.

Traffic marshals, or site staff acting as traffic marshals, should hold the relevant qualifications required for directing large vehicles when reversing. Marshals should be equipped with ‘STOP – WORKS’ signs (not STOP/GO signs) if control of traffic on the public highway is required. Marshals should have radio contact with one another where necessary.

a. Please detail the proposed site access and egress points on a map or diagram. If this is attached, use the following space to reference its location in the appendices.



b. Please describe how the access and egress arrangements for construction vehicles in and out of the site will be managed, including the number and location of traffic marshals where applicable. If this is shown in an attached drawing, use the following space to reference its location in the appendices.

Deliveries and collection vehicles will report on arrival at the site gate to the Traffic Marshal who will check in the vehicle, assist and make safe the access. Reversing will be reduced to a minimum; all reversing manoeuvres will be carried out under the surveillance of Traffic Marshals if any.

All vehicle movements will be under the surveillance of a Traffic Marshal. Whistles will be provided to the Traffic Marshals as an aid in emergency situations, for example pedestrian/cyclist, ect. forcing their way in the manoeuvre/vehicle movement area regardless traffic marshals' instruction to stop and wait clearance.

Only authorised vehicles will be allowed to enter the site and must fully comply with the directions given by the traffic marshal. The arrival time will have to be respected. Any vehicle arriving at site before or after the allocated hour will be turned away.

c. Please provide swept path drawings for vehicles accessing/egressing the site if necessary. If these are attached, use the following space to reference their location in the appendices.

Please refer to *Fire Engine access/egress route available in Appendix 2.*
Lorry Swept Path available in Appendix 3

d. Provision of wheel washing facilities should be considered if necessary. If so, please provide details of how this will be managed, and any run-off controlled. Please note that wheel washing should only be used where strictly necessary, and that a clean, stable surface for loading should be used where possible.

As there will be almost no groundworks carried out by Legendre UK and vehicles accessing and egressing the site will only circulate on Shorts Gardens or Betterton Street, which are hardstanding surfaces, there should not be any mud on the local highway. However, a jet washer will be available on site to be used if needed.

Any vehicle movement areas within the construction site will also be hardstanding. The surrounding routes of the construction site will be kept clean and tidy at all times with regular sweeping and road washing taking place.

21. Vehicle loading and unloading: *"Clients shall ensure that vehicles are loaded and unloaded on-site as far as is practicable."* (P19, 3.4.4)

This section is only relevant if loading/unloading is due to take place off-site on the public highway. If loading is taking place on site, please skip this section.

a. please provide details of the parking and loading arrangements for construction vehicles with regard to servicing and deliveries associated with the site (e.g. delivery of materials and plant, removal of excavated material). This is required as a scaled site plan, showing all

points of access and where materials, skips and plant will be stored, and how vehicles will access and egress the site. If this is attached, use the following space to reference its location in the appendices. Please outline in question 24 if any parking bay suspensions will be required.

N/A

b. Where necessary, Traffic Marshalls must ensure the safe passage of pedestrians, cyclists and motor traffic in the street when vehicles are being loaded or unloaded. Please provide detail of the way in which marshals will assist with this process, if this differs from detail provided in Q20 b.

N/A

Street Works

Full justification must be provided for proposed use of the public highway to facilitate works. Camden expects all options to minimise the impact on the public highway to have been fully considered prior to the submission of any proposal to occupy the highway for vehicle pit lanes, materials unloading/crane pick points, site welfare etc.

Please note that Temporary Traffic Orders (TTOs) and hoarding/scaffolding licenses may be applied for prior to CMP submission but won't be granted until the CMP is signed-off.

Please note that there is a two week period required for the statutory consultation process to take place as part of a TTO.

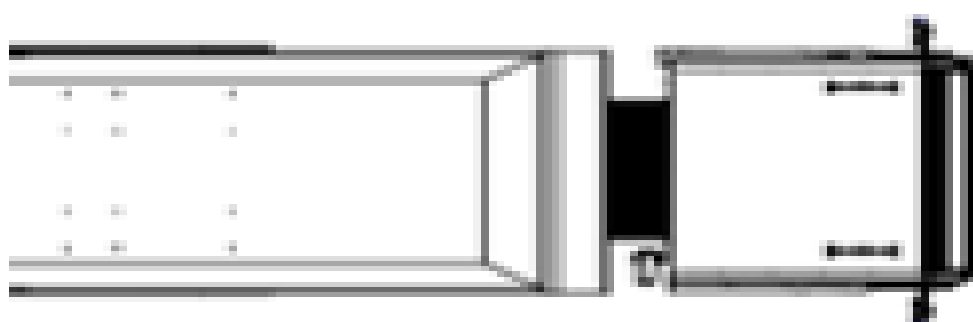
If the site is on or adjacent to the TLRN, please provide details of preliminary discussions with Transport for London in the relevant sections below.

If the site conflicts with a bus lane or bus stop, please provide details of preliminary discussions with Transport for London in the relevant sections below.

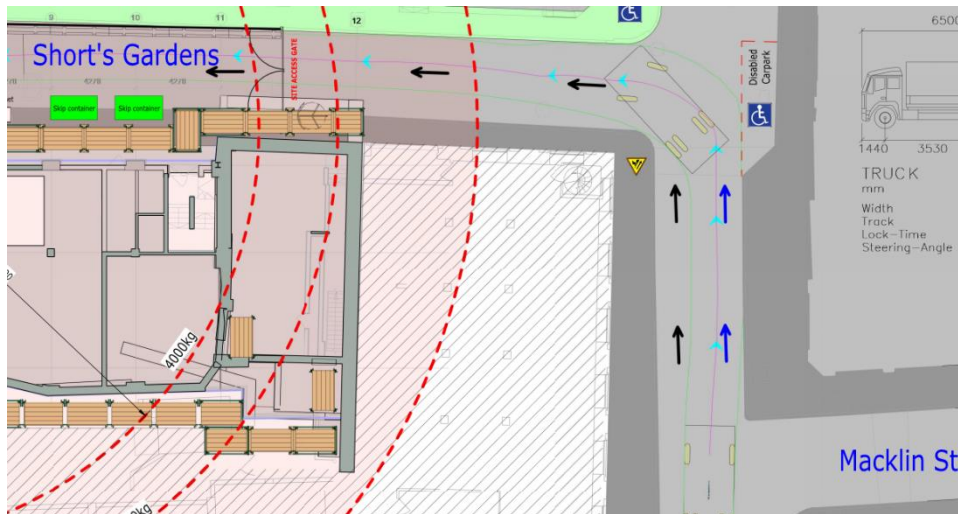
22. Site set-up

Please provide a scaled plan detailing the local highway network layout in the vicinity of the site. This should include details of on-street parking bay locations, cycle lanes, footway extents, relevant street furniture, and proposed site access locations. If these are attached, use the following space to reference their location in the appendices.

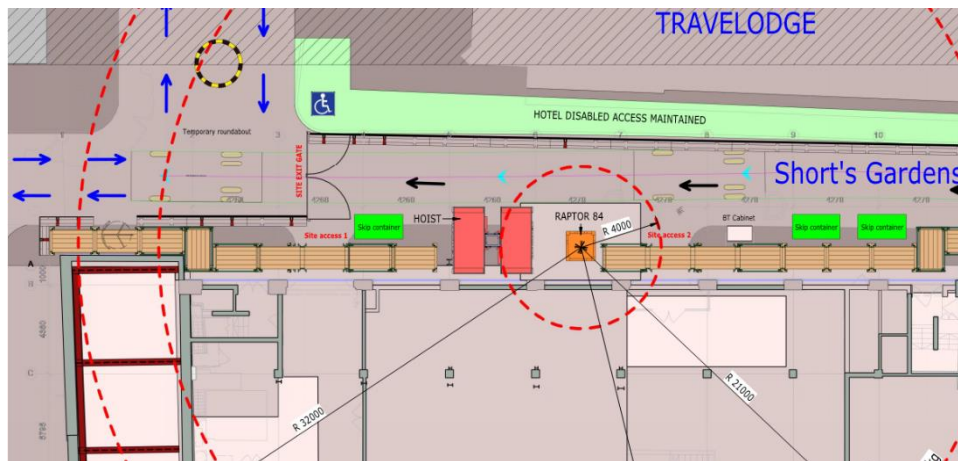
The picture below shows the immediate highway network with directional arrows indicating the prescribed traffic flow, following comments from the Council's Planning Transport Officer



Access to the construction site



Egress from the construction site



23. Parking Bay suspensions and temporary traffic orders

Parking bay suspensions should only be requested where absolutely necessary and these are permitted for a maximum of 6 months only. For exclusive access longer than 6 months, you will be required to obtain a [Temporary Traffic Order \(TTO\)](#) for which there is a separate cost.

Please provide details of any proposed parking bay suspensions and/or TTO's which would be required to facilitate the construction - include details of the expected duration in months/weeks. Building materials and equipment must not cause obstructions on the highway as per your CCS obligations unless the requisite permissions are secured.

Information regarding parking suspensions can be found [here](#).

We can confirm that from our perspective, based on numerous swept paths completed for different lorry types, there is no need for any parking suspensions to deliver the scheme. The two inside the hoarding are not part of the wider scheme once the project is completed, these were always going to be removed. We have detailed crossings points when required without need for parking suspension as per above. Lastly the Drury Lane Disabled Parking Bay is a Council requirement rather than ours, therefore should you wish to move it is not an item chargeable to Legendre UK.

24. Occupation of the public highway

Please note that use of the public highway for storage, site accommodation or welfare facilities is at the discretion of the Council and is generally not permitted. If you propose such use you must supply full justification, setting out why it is impossible to allocate space on-site. We prefer not to close footways but if this is unavoidable, you should submit a scaled plan of the proposed diversion route showing key dimensions.

a. Please provide justification of proposed occupation of the public highway.

The Short's Gardens partial street closure is proposed in conjunction with the advice from the London Borough of Camden Principal Transport Planner.

Legendre UK will apply to the Council for full road closure of Shorts Gardens to ensure deliveries and unloading can be done in a safe environment, maintaining the works away from any member of the public.

This will include for the hoarding to be erected along the whole footprint of the building. The footpath along the Travelodge hotel will be maintained as existing, maintaining the disabled access and any other foot traffic.

Onto Betterton Street, to maintain a safe working zone and avoid as many hazards as possible to the public, a hoarding will be erected to close off the foot way along the 16-18 Betterton façade.

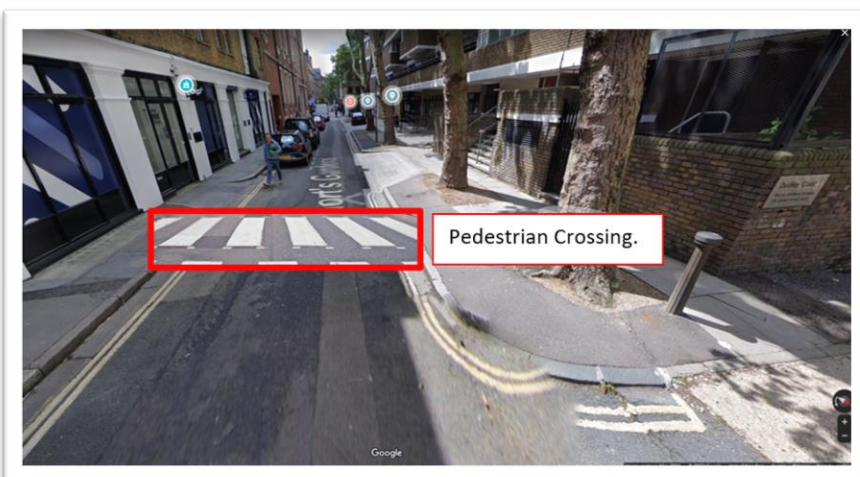
The footpath will be diverted via the use of 2 temporary crossings.

Pedestrian Crossings; for clarity: The need for a crossing point on Shorts Gardens will be kept under review, and that the two permit holder bays on Shorts Gardens to the immediate west of your site will be suspended to provide a safe crossing point in this location if required. In the first instance however, footway closed ahead signs will be used at the junction with Endell St to direct pedestrians to use the opposite footway.

Betterton Street Crossing:



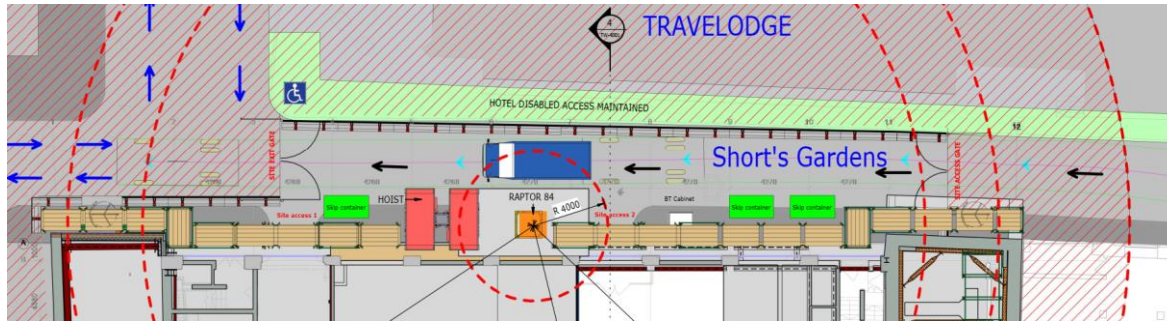
Short's Gardens Crossing.



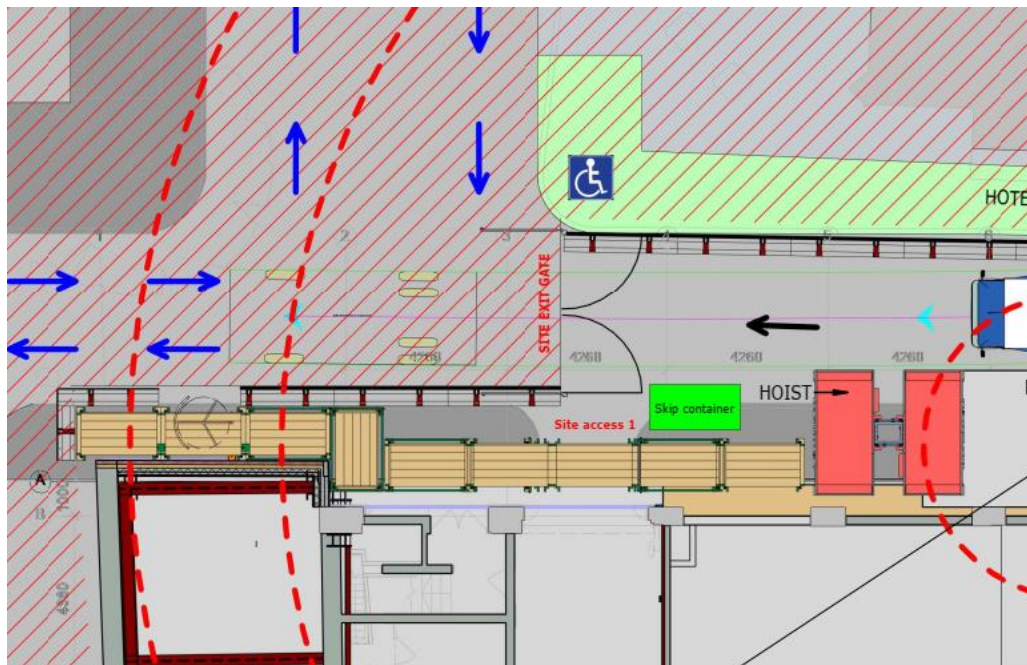
b. Please provide accurate scaled drawings of any highway works necessary to enable construction to take place (e.g. construction of temporary vehicular accesses, removal of street furniture etc). If these are attached, use the following space to reference their location in the appendices.

Drawing showing the Full time road closure on Shorts Gardens between Drury Lane and the Travelodge entrance.

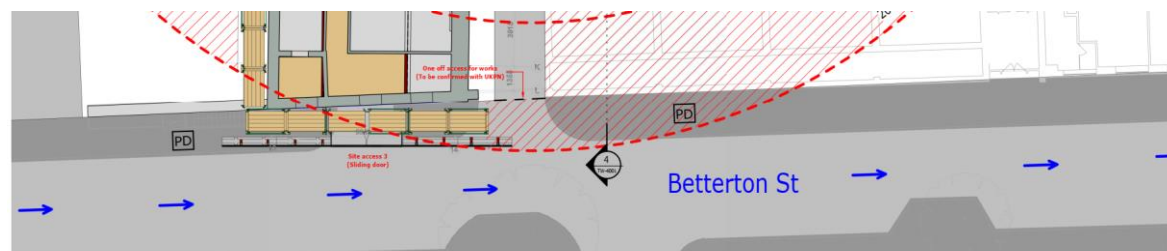
Short's Gardens:



Drawing showing the hoarding and scaffolding on the foot path directly in front of the project's façade on Short's Gardens.



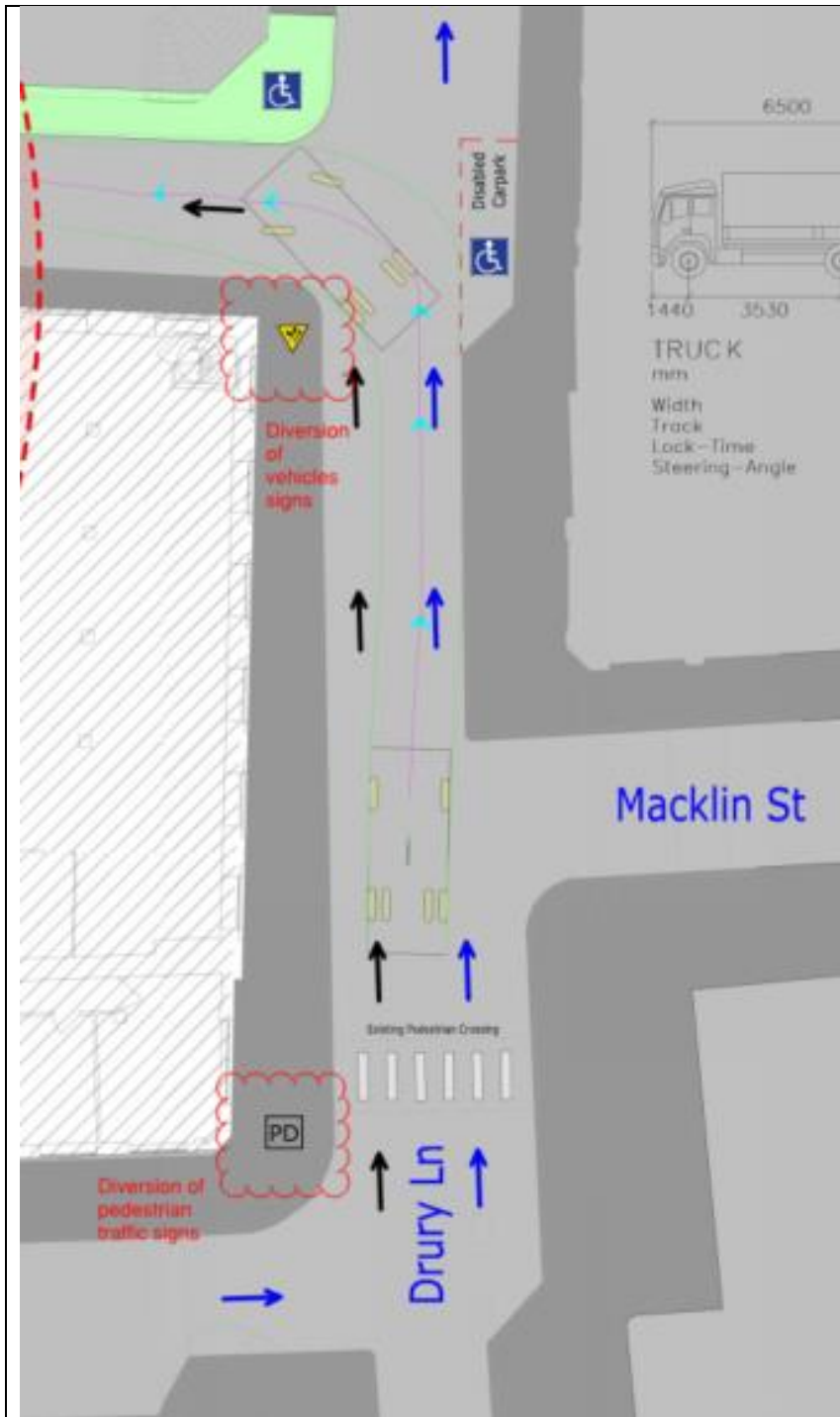
Drawing showing the foot path closure onto Betterton Street. – Please refer to drawing “Short's Gardens - Supporting Documents” which demonstrates proposed signage layout on Betterton street and Short's Gardens.



Please refer to Appending 1 for Site Installation Plan

25. Motor vehicle and/or cyclist diversions

Where applicable, please supply details of any diversion, disruption or other anticipated use of the public highway during the construction period. Please show locations of diversion signs on drawings or diagrams. If these are attached, use the following space to reference their location in the appendices.



The road closure of Short's gardens implies the diversion of vehicles to stay straight onto Drury Lane

Please refer to Appending 1 for Site Installation Plan

26. Scaffolding, hoarding, and associated pedestrian diversions

Pedestrians' safety must be maintained if diversions are put in place. Vulnerable footway users should also be considered. These include wheelchair users, the elderly, those with walking difficulties, young children, those with prams, the blind and partially sighted. Appropriate ramps must be used if cables, hoses, etc. are run across the footway.

Any work above ground floor level may require a covered walkway adjacent to the site. A licence must be obtained for scaffolding and gantries. The adjoining public highway must be kept clean and free from obstructions, and hoarding should not restrict access to adjoining properties, including fire escape routes. Lighting and signage should be used on temporary structures/skips/hoardings etc.

A secure hoarding will generally be required at the site boundary with a lockable access.

a. Where applicable, please provide details of any hoarding and/or scaffolding that intrudes onto the public highway, describing how pedestrian safety will be maintained through the diversion, including any proposed alternative routes. Please provide detailed, scale drawings that show hoarding lines, gantries, crane locations, scaffolding, pedestrian routes, parking bay suspensions, remaining road width for vehicle movements, temporary vehicular accesses, ramps, barriers, signage, lighting etc. If these are attached, use the following space to reference their location in the appendices.

The full-time road closure of Short's gardens and the foot path closure on Betterton Street imply the diversion of pedestrian to the opposite foot paths. Please refer to drawing "Short's Gardens - Supporting Documents" which demonstrates proposed signage layout on Betterton Street and Short's Gardens.

Closure of Shorts Gardens will be required for mobile crane operations, hoarding erection and dismantling and scaffolding. The diversion route for pedestrians will be adequately identified with appropriate signage showing safe alternative routes. Pedestrian crossing points will also be properly marked, and suitable signage will be displayed.

Please refer to Appending 1 for Site Installation Plan

b. Please provide details of any other temporary structures which would overhang/oversail the public highway (e.g. scaffolding, gantries, cranes etc.) If these are attached, use the following space to reference their location in the appendices.

No oversailing the public highway

27. Services

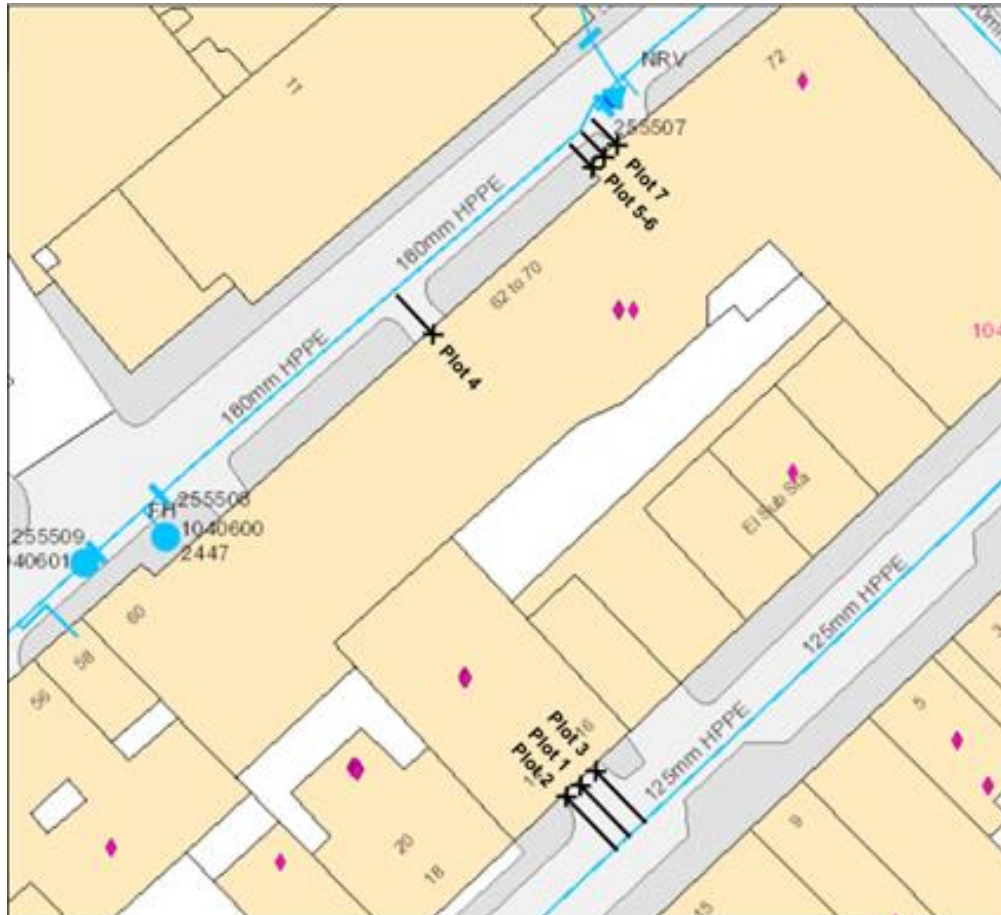
Please indicate if any changes to services are proposed to be carried out that would be linked to the site during the works (i.e. connections to public utilities and/or statutory undertakers' plant). Larger developments may require new utility services. If so, a strategy and programme for coordinating the connection of services will be required. If new utility services are required, please confirm which utility companies have been contacted (e.g. Thames Water, National Grid, EDF Energy, BT etc.) You must explore options for the utility companies to share the same excavations and traffic management proposals. Please supply details of your discussions.

Mains Cold Water

The existing cold-water mains supply pipelines from Thames Water surround the property on Betterton Street, Drury Lane and Short's Gardens and are depicted in blue lines on the drawing below -125mm HPPE (high pressure polyethylene) pipes run along Betterton Street, 250mm HPPE pipes run along Drury Lane and 180mm HPPE pipes run along Short's Gardens.

7 new connections will be created:

- 3 connections from Betterton Street (1 for the flats, 1 for offices and 1 for commercial space)
- 4 connections from Short's Gardens (3 for commercial spaces, 1 for sprinkler tanks)



Electricity

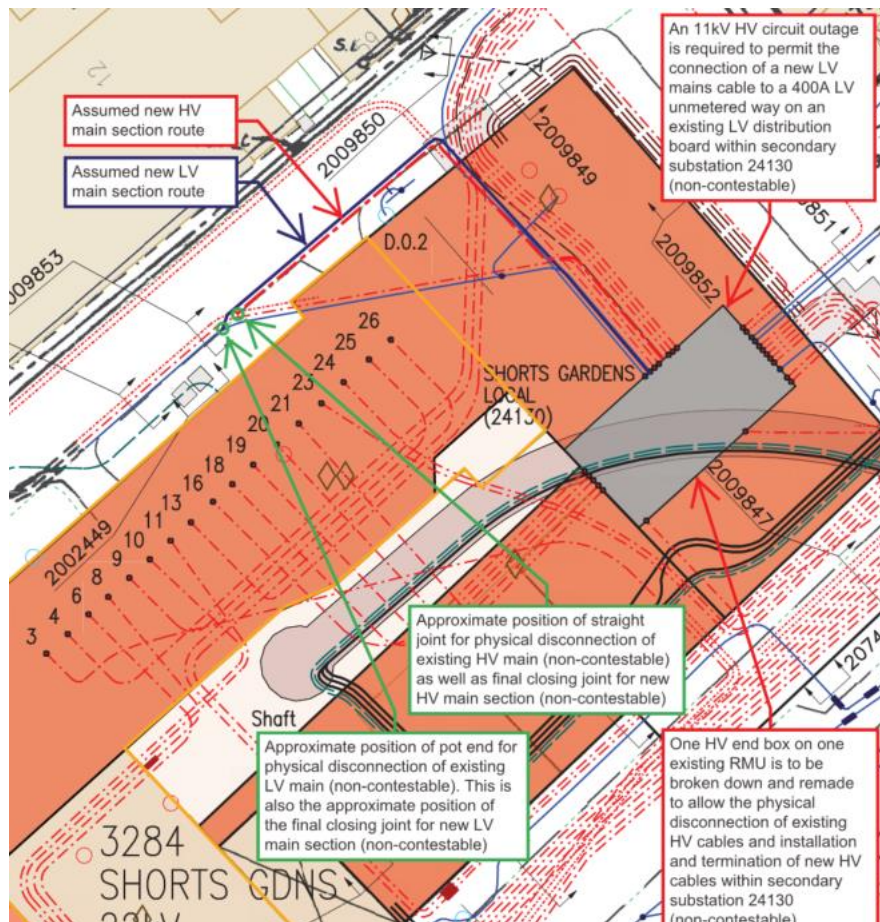
The building is situated adjacent to UKPN 22kV primary substation. The utility statutory information indicates significant High Voltage (HV) cables emanating from this primary substation. There are HV cables shown beneath the development at basement level.

It is believed that this area of the building used to be part of UKPN primary substation. Therefore, it is possible that the HV cables are now redundant, but this will be confirmed with UKPN prior to any works starting.

Along Short's Gardens, the primary substation adjoins the project building at upper basement level.

The new works comprise of:

- 1 no. new substation to serve the development – proposed location off 72 Shorts Gardens, subject to UKPN acceptance
- Diversion of existing 1 x LV cable and 1 x HV cable, 7 x pilot cables (five appear to no longer be in use / disconnected, all seven will need to be verified)



Telecoms

There are existing BT Openreach infrastructure lines along Betterton Street and Drury Lane. There is a Virgin Media infrastructure in the street of Short's Gardens with a VM box right outside the building onto Short's Gardens that we believe will need to be maintained in this location throughout the project. We have enquired with VM for the possibility to relocate or to protect this asset during the works.

New services to be installed:

- Provision for 2 no. new telecom providers

Environment

To answer these sections please refer to the relevant sections of **Camden's Minimum Requirements for Building Construction (CMRBC)**.

28. Please list all [noisy operations](#) and the construction method used, and provide details of the times that each of these are due to be carried out.

Legendre UK understands that, as per London Borough of Camden Guide for Contractors, the below activities are considered noisy activities. Therefore, such activities will be strictly restricted to the normal working hours (as above) in order to reduce noise nuisance to local residents and people who run businesses in the area, and to give them suitable breaks from noise and vibration.

- Erecting, constructing, altering, repairing and maintaining of any building, structure or road
- Breaking up, opening or digging under any road or nearby land in connection with carrying out, inspecting, maintaining or removing work
- Any demolition or dredging work
- Any engineering work (whether or not already covered in the three points above)

Legendre UK will be in charge of the demolition and construction works on this project. Legendre UK programme currently assumes that noisy activities will mainly be related to strip out, cutting activities and the presence of plant and equipment on site. All these activities will be managed to meet these restrictions.

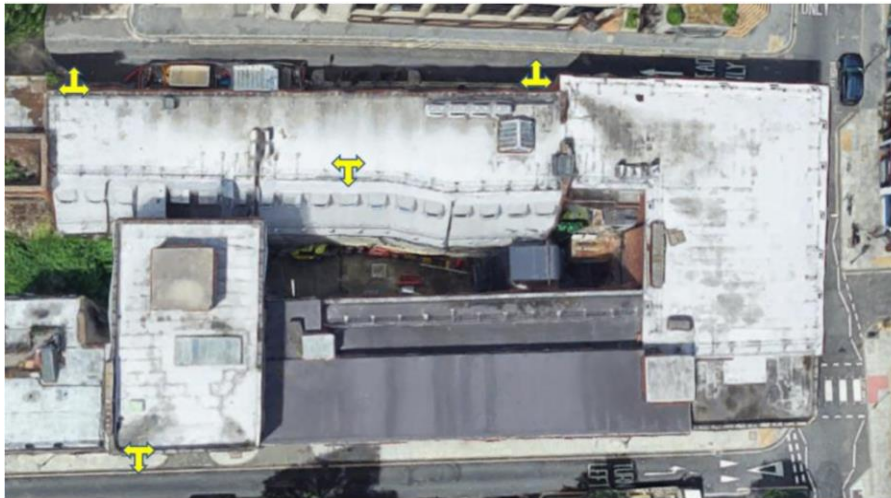
However, where unavoidable, Legendre UK will fully justify any proposed deviation from these operating periods and will apply to the London Borough of Camden Noise and Licensing Enforcement Team for a Short Term "Out of Hours" Section 61 permission. Legendre UK will complete the relevant form (Application for Prior Consent for Control of Noise and Vibration from Works to be Carried out on a Construction Site) and send it by email to: OOHNoiseNotification@Camden.gov.uk. Legendre UK will endeavour to submit the form at least 28 days prior to the works being carried out. However, this notice time shall be reduced should there be an emergency situation.

Once approval is given by Camden Council, Legendre UK will notify neighbours before works outside normal hours commence.

At present it is not intended to deviate from the standard working hours other than for mobile crane operations, hoarding erection and dismantling and scaffolding that will require the closure of Shorts Gardens. These will be limited to those contributing to the safe operation of the site. There will be full liaison with the relevant Camden departments and the Police, to agree timings. This will then be communicated to our neighbours, in particular the Travelodge, since it will be necessary to utilise their loading bay access to set-up the mobile crane.

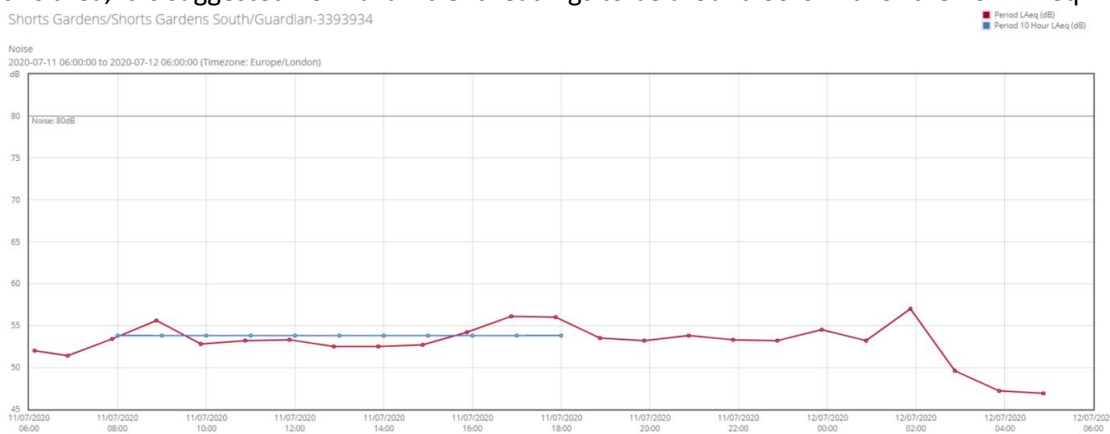
29. Please confirm when the most recent noise survey was carried out (before any works were carried out) and provide a copy. If a noise survey has not taken place please indicate the date (before any works are being carried out) that the noise survey will be taking place, and agree to provide a copy.

A baseline Environmental Monitoring was carried out by Sunbelt Rentals from 18th May 2020 to the present in order to gain data to indicate ambient noise, dust and vibration levels around the site. Sunbelt rentals installed and maintained 4 x Guardian 2 environmental monitoring stations around the Shorts Gardens project. The units were equipped with a Class 1 noise monitor, a dust and particulate monitor capable of monitoring PM10, PM2.5 & PM1 simultaneously, a 3 axis vibration sensor measuring PPV (peak particle velocity) and a digital wind speed & direction sensor. The locations of the monitoring stations are shown below



The report issued by Sunbelt Rentals suggests that the ambient noise levels recorded are between 5 and 10% lower than would normally be seen in this area. This was due to the strict Government Covid lockdown in the area which has led to a much lower level of local traffic and pedestrians.

The graph below produced by Sunbelt Rentals shows a typical daily noise reading with the red line indicating noise levels (LAeq) over each hour period and the blue line - the 10hr LAeq. This factors the normal working day from 8am to 6pm. For non-lockdown periods in this area, it is suggested normal ambient readings to be around 60-62Db for the 10hr LAeq.



30. Please provide predictions for [noise](#) and vibration levels throughout the proposed works.

Sunbelts Rentals suggested that the alert levels are set as below:

- 10HR LAeq - 70Db
- PM10 amber alert 150 µg/m³ , Red level 250 µg/m³
- Vibration amber alert 7mm/s, Red alert 10mm/s
- And these are the limit levels proposed to be set by Legendre UK for

The noise levels at the site boundary detailed below will be adopted on site:

- Monday to Friday working day (8:00-18:00): a trigger level (Amber) of 70 dB(A) Leq,10hr and an action level (Red) of 75 dB(A) Leq,10hr
- Saturday working day (08:00-13:00): a trigger level (Amber) of 70 dB(A) Leq,5hr and an action level (Red) of 75 dB(A) Leq,5hr
- At any time over a 15-minute period: a trigger level (Amber) of 75 dB(A) Leq,15min and an action level (Red) of 80 dB(A) Leq,15min

In line with Camden's Minimum Requirements and British Standard BS 5228: 2009, a Peak Particle Velocity Vibration Trigger Level of 7mm/s and Action Level of 10mm/s

31. Please provide details describing mitigation measures to be incorporated during the construction/[demolition](#) works to prevent noise and vibration disturbances from the activities on the site, including the actions to be taken in cases where these exceed the predicted levels.

The following mitigation measures will be adopted:

- Installation of a solid hoarding around site perimeter
- Setting of a 5-mph onsite speed limit
- Use of electrically powered plant and equipment where possible in preference to diesel or petrol driven
- Avoiding wherever possible the use of diesel- or petrol-powered generators by using mains electricity
- Covering of the scaffold Monarflex or similar
- Shutting down equipment when not in use or throttling down to a minimum during waiting period
- Careful handling of materials and waste, such as lowering rather than dropping items
- If chutes are used to bring down waste materials, acoustic wrapping will be used
- Location of noisy plant or equipment as far as possible from noise sensitive buildings. Barriers (e.g. site huts, acoustic sheds, or partitions) to mitigate noise affecting sensitive buildings should be employed where practicable
- Use of modern, quiet and well-maintained equipment (all equipment must comply with the EC Directives and UK Regulations set out in BS 5228-1:2009+A1:2014)
- Use of screws and drills rather than nails for fixing hoardings
- Use of an alternative to percussive drills/hammer where possible. Pneumatic percussive tools should be fitted with anti-ring devices, mufflers or silencers of the type recommended by the manufacturers.
- Use of compressors fitted with properly lined and sealed acoustic covers that should be kept closed whenever in use
- Erection of acoustic screens or enclosures wherever possible
- Use of vehicles and plant fitted with effective exhaust silencers, maintained in good and efficient working order and operated in such a manner as to minimise noise emissions. All construction vehicles should have upward pointing exhausts
- Plant shall be maintained in a good and workmanlike condition so that extraneous noise from mechanical vibration, creaking and squeaking is reduced to a minimum
- Careful loading/unloading vehicles, scaffolding to reduce impact noise

32. Please provide evidence that staff have been trained on BS 5228:2009

Legendre UK staff members are aware of the requirements to control noise and vibration arising from construction works. All site staff and Contractors/Sub-contractors will be the subject of pre-start meetings and specific briefings as part of site induction.

All Contractors/Sub-contractors provided with the project's CMP and CPHSP prior to starting which outline the site requirements for noise and vibration control.

33. Please provide specific details on how air pollution and dust nuisance arising from dusty activities on site will be prevented. This should be relevant and proportionate to activities due to take place, with focus on both preventative and reactive mitigation measures.

The below preventative/mitigation measures will be adopted:

- Machinery and dust generating activities located as far as possible from off-site sensitive receptors.
- Use of barriers to mitigate dust affecting sensitive buildings where practicable
- Installation of solid screens/barriers around dust generating activities and stockpiles, these should be as high as the stockpiles as a minimum
- Retainment of as much hardstanding as possible, for as long as possible
- Bunding of the construction area to prevent run off and mud on the public highway
- Provision of personal cleaning facilities such as showers and boots cleaners on site
- High level of site housekeeping with regular site cleaning
- Avoiding dry sweeping of large areas
- Damping down of the construction site especially when dry weather
- Consideration for the installation of a fixed irrigator system on the hoarding close to the sensitive receptors
- Keeping all plant and equipment in good state of repair and conform to the manufacturer's specification or legislative standards, regular maintenance of engines and plant, maintenance of pumps and bowser jets
- Enclosed or sheeted lorries entering or leaving the site and covering of skips where possible
- Damping down of haul routes both within and outside the site on a regular basis

34. Please provide details describing how any significant amounts of dirt or dust that may be spread onto the public highway will be prevented and/or cleaned.

- Keeping hoarding, fencing, barriers, scaffolding and screening clean using wet methods to prevent re-suspension of particulate matter
- Use of vehicles and plant with low emission levels (such as electric or hybrid equipment) and complying with the standards of the London Low Emission Zone
- Prevention of unnecessary engine idling both on site and off site
- Damping down of haul routes both within and outside the site on a regular basis
- Avoiding unnecessary vehicle movements and manoeuvring
- Use of wheel-washes or other similar facilities

35. Please provide details describing arrangements for monitoring of [noise](#), vibration and dust levels, including instrumentation, locations of monitors and trigger levels where appropriate.

Continual noise, dust and vibration monitoring will be undertaken during operational site hours at the site boundary until shell & core works are finished.

Vibration monitoring will be undertaken at selected times and points close to sensitive receptors throughout the duration of the project.

Noise:

- real-time management live screen featuring intuitive traffic light system interface to ensure compliance with assessment criteria
- anticipatory functions based upon remaining noise dose left which facilitates immediate
- correction actions to be taken to avoid exceedance of trigger levels
- audio recording / playback on trigger level exceedance (noise only); fully EC 61672 Class 1 compliant system
- conformance to traceable Class 1 standards; and continuous noise measurement of Leq Lmax Lmin and percentile values (L90 L10 etc.)

Dust:

- conformance with Environmental Agency's MCERTS certification
- continuous measurement of the concentration of TSP PM10 PM25 and PM1

Vibration:

- DIN45669 compliant - ensuring the highest measurement integrity
- BS 7385 frequency dependent cosmetic damage limits
- BS 7385 displacement threshold
- BS 5228 "perception" and "complaint" thresholds
- user selectable frequency dependent limits

In line with the planning application, we propose to put in place some Noise, Vibration and dust monitoring at the boundary of the project during the construction phase.

This will be covered by 2 locations, one on Short's Gardens and one on Betterton Street.

See below proposed locations:



36. Please confirm that an Air Quality Assessment and/or Dust Risk Assessment has been undertaken at planning application stage in line with the GLA policy [The Control of Dust and Emissions During Demolition and Construction 2014 \(SPG\)](#) (document access at bottom of webpage), and that the summary dust impact risk level (without mitigation) has been identified. The risk assessment must take account of proximity to all human receptors and sensitive receptors (e.g. schools, care homes etc.), as detailed in the [SPG](#). **Please attach the risk assessment and mitigation checklist as an appendix.**

We have assessed that the project will be in the “Small” category for potential dust emissions, based on the following:

- Demolition Phase – total volume of building to be demolished <20,000m³. we assess 1,300m³. Demolition method unlikely to generate quantities of dust and work being carried out during wetter months
- Earthworks Phase – not really applicable (only extending the basement of number 60)
- Construction Phase – total volume of building <25,000m³. We assess 16,000m³ of construction material with low potential for dust release
- Track out Phase – not applicable (only the demolition debris and excavation arisings from number 60 – not passing over unpaved ground)

We have also assessed that the area around the site is a low sensitivity receptor to dust soiling effects, health effects on people and having no ecological effects

37. Please confirm that all of the GLA’s ‘highly recommended’ measures from the SPG document relative to the level of dust impact risk identified in question 36 have been addressed by completing the GLA mitigation measures checklist. (See Appendix 7 of the SPG document.)

In line with the SPG document Legendre UK will adopt the following control measures:

- The details of the persons responsible for managing dust emissions and air pollution, the person dealing with complaints, details of the HSE Manager and head office contact information will be displayed on the hoarding
- Legendre UK will maintain a complaint log and will record any complaints made from the local residents or businesses or the Council, detailing the nature of the complaint, the cause and, where appropriate, the remedial action taken. All Contractors/Sub-contractors will be required to immediately notify Legendre UK should they receive any complaints. A 24/7 contact number (usually Message Pad) and a project specific email address (shortsgardenscomments@groupe-legendre.com) will be implemented to receive formal complaints. These will be directed to the Project Director, The HSE Manager and the Project Management Team. These 24/7 contact number and email address, in addition to the site postal address, will be displayed on the site hoarding and published in the on-going communication to the neighbours.
- Continuous monitoring of the dust concentration levels using real-time management live screen featuring intuitive traffic light system interface to ensure compliance with the limits set
- Regular site inspections carried out by the site team and the HSE Manager to ensure compliance of the workforce with the preventative and the mitigation measures put in place
- Record any exceptional incidents that cause or have the potential to cause air pollution

Please refer to Section 33 for preventative/mitigation measures that will be adopted on site.

38. Please confirm the number of real-time dust monitors to be used on-site.

Note: **real-time dust (PM₁₀) monitoring with MCERTS 'Indicative' monitoring equipment will be required for all sites with a high OR medium dust impact risk level.** If the site is a 'high impact' site, 4 real time dust monitors will be required. If the site is a 'medium impact' site', 2 real time dust monitors will be required.

The dust monitoring must be in accordance with the SPG and IAQM guidance, and **the proposed dust monitoring regime (including number of monitors, locations, equipment specification, and trigger levels) must be submitted to the Council for approval.** Dust monitoring is required for the entire duration of the development and must be in place and operational **at least three months prior to the commencement of works on-site.** Monthly dust monitoring reports must be provided to the Council detailing activities during each monthly period, dust mitigation measures in place, monitoring data coverage, graphs of measured dust (PM₁₀) concentrations, any exceedances of the trigger levels, and explanation on the causes of any and all exceedances in addition to additional mitigation measures implemented to rectify these.

In accordance with Camden's Clean Air Action Plan, the monthly dust monitoring reports must also be made readily available and accessible online to members of the public soon after publication. Information on how to access the monthly dust monitoring reports should be advertised to the local community (e.g. presented on the site boundaries in full public view).

Inadequate dust monitoring or reporting, or failure to limit trigger level exceedances, will be indicative of poor air quality and dust management and will lead to enforcement action.

We will be using 2 monitoring equipment during the construction phase as per the location plan in section 35.

39. Please provide details about how rodents, including rats, will be prevented from spreading out from the site. You are required to provide information about site inspections carried out and present copies of receipts (if work undertaken).

An initial inspection of the buildings for infestation of rodents / pigeons will be carried out prior to works commencing. Control measures will be put in place as necessary, and any detritus removed by a specialist. Regular inspections will be carried out during the works by the project team to ensure that recurrence of the issue does not take place. Operatives will be encouraged to report any signs of infestation.

40. Please confirm when an asbestos survey was carried out at the site and include the key findings.

Asbestos Re-Inspection Survey was completed by Bellamy Surveying and Consultancy Services Ltd in January 2021 following Refurbishment & Demolition Surveys carried out in 2019 and 2020. The Asbestos Re-Inspection Survey confirms that all identified asbestos throughout the building has been removed by licensed Contractors with the exception of 2 Asbestos components as below:

- Sample 1 – Amosite asbestos present in window glazing compound (putty) – office, third floor
- Sample 24 – Chrysotile asbestos present in window panels – storage area, ground floor (mezzanine)

Please refer to Appendix 5 for report extract

41. Complaints often arise from the conduct of builders in an area. Please confirm steps being taken to minimise this e.g. provision of a suitable smoking area, tackling bad language and unnecessary shouting.

A designated smoking area will be provided on site and located away from sensitive boundaries and residential neighbours. The area will also be installed in a location hidden from the outside of the site. Adequate waste bins will be provided and emptied daily. No smoking will be permitted outside of designated areas.

All Operatives will be required to remove their PPE (Hard hat and Hi-Viz) when leaving site and whilst on the public area.

All will be instructed during their induction of the above and a clear message will be passed to all operatives that unacceptable behaviour, both on or off site, is not tolerated. Operatives will be encouraged not to leave site during the working day by the provision of a high standard of welfare accommodation the canteen facilities. Shouting will be discouraged, with the provision of radios where communication at distance is required. Bad language will also be monitored, and action taken when necessary; Legendre UK operates red and yellow card disciplinary procedure. The project team and the HSE Manager will monitor operatives' conduct to ensure operatives do not congregate outside the confines of the site and any inappropriate behaviour will result in instant dismissal from site. Legendre UK will issue regular newsletters to the neighbours and will also have these displayed on the site hoarding. The newsletters will contain the office manager contact details who will be the point of contact for complaints and suggestions. Legendre UK will also have a suggestion box attached to the site hoarding.

42. If you will be using non-road mobile machinery (NRMM) on site with net power between 37kW and 560kW it will be required to meet the standards set out below. The standards are applicable to both variable and constant speed engines and apply for both PM and NOx emissions. See the Mayor of London webpage 'Non-Road Mobile Machinery (NRMM)' for more information, a map of the Central Activity Zone, and for links to the NRMM Register and the NRMM Practical guide: <https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/nrmm>

From 1st September 2015

(i) Major Development Sites – NRMM used on the site of any major development will be required to meet Stage IIIA of EU Directive 97/68/EC

(ii) Any development site within the Central Activity Zone - NRMM used on any site within the Central Activity Zone will be required to meet Stage IIIB of EU Directive 97/68/EC

From 1st September 2020

(iii) Any development site - NRMM used on any site within Greater London will be required to meet Stage IIIB of EU Directive 97/68/EC

(iv) Any development site within the Central Activity Zone - NRMM used on any site within the Central Activity Zone will be required to meet Stage IV of EU Directive 97/68/EC

Please provide evidence demonstrating the above requirements will be met by answering the following questions:

- a) Construction time period (mm/yy - mm/yy): 10/21 – 11/23
- b) Is the development within the CAZ? (Y/N): Y
- c) Will the NRMM with net power between 37kW and 560kW meet the standards outlined above? (Y/N): Y
- d) Please confirm that all relevant machinery will be registered on the NRMM Register, including the site name under which it has been registered: The site has been registered with NRMM; all machinery will be added to the Register once brought to site.

NRMM BETA This is a new website your feedback will help us to improve it.

Home > NRMM > Site Details - Shorts Gardens

Register a Site Your Details Sign Out

Shorts Gardens

Camden, WC2H 9AU, Central Activities Zone and Opportunity Areas
 Planning app. #: LBC 2017/2204/P
 Start/End: 25 Oct 2021 - 30 Sep 2022
 Registered: 06 Oct 2021

Map Satellite

Contacts

Direct Site Contact	Site Administrator
Mariyana Miteva mariyana.miteva@groupe-legendre.com	MARIYANA MITEVA mariyana.miteva@groupe-legendre.com

Invitations Invite a user

Machinery Administrator
Bart Clurja bartlomiej.clurja@groupe-legendre.com

- e) Please confirm that an inventory of all NRMM will be kept on site and that all machinery will be regularly serviced and service logs kept on site for inspection: Yes
- f) Please confirm that records will be kept on site which details proof of emission limits, including legible photographs of individual engine plates for all equipment, and that this documentation will be made available to local authority officers as required: Yes

43. Vehicle engine idling (leaving engines running whilst parked or not in traffic) produces avoidable air pollution and can damage the health of drivers and local communities. Camden Council and City of London Corporation lead the London **Idling Action Project** to educate drivers about the health impacts of air pollution and the importance of switching off engines as a simple action to help protect the health of all Londoners.

Idling Action calls for businesses and fleet operators to take the **Engines Off pledge** to reduce emissions and improve air quality by asking fleet drivers, employees and subcontractors to avoid idling their engines wherever possible. Free driver training materials are available from the website: <https://idlingaction.london/business/>

Please provide details about how you will reduce avoidable air pollution from engine idling, including whether your organisation has committed to the Engines Off pledge and the number of staff or subcontractors who have been provided with free training materials.

Delivery drivers will be required to switch their engines off whilst waiting for loading/unloading of their vehicles. This will be outlined in the Traffic Management Plan that will be distributed to all concerned, e.g. Suppliers, Sub-contractors and will be covered in the Site Induction Training.

• SYMBOL IS FOR INTERNAL USE

Agreement

The agreed contents of this Construction Management Plan must be complied with unless otherwise agreed in writing by the Council. This may require the CMP to be revised by the Developer and reapproved by 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 in writing and complied with thereafter.

It should be noted that any agreed Construction Management Plan does not prejudice further agreements that may be required such as road closures or hoarding licences.

Signed:

Date:

Print Name:

Position:

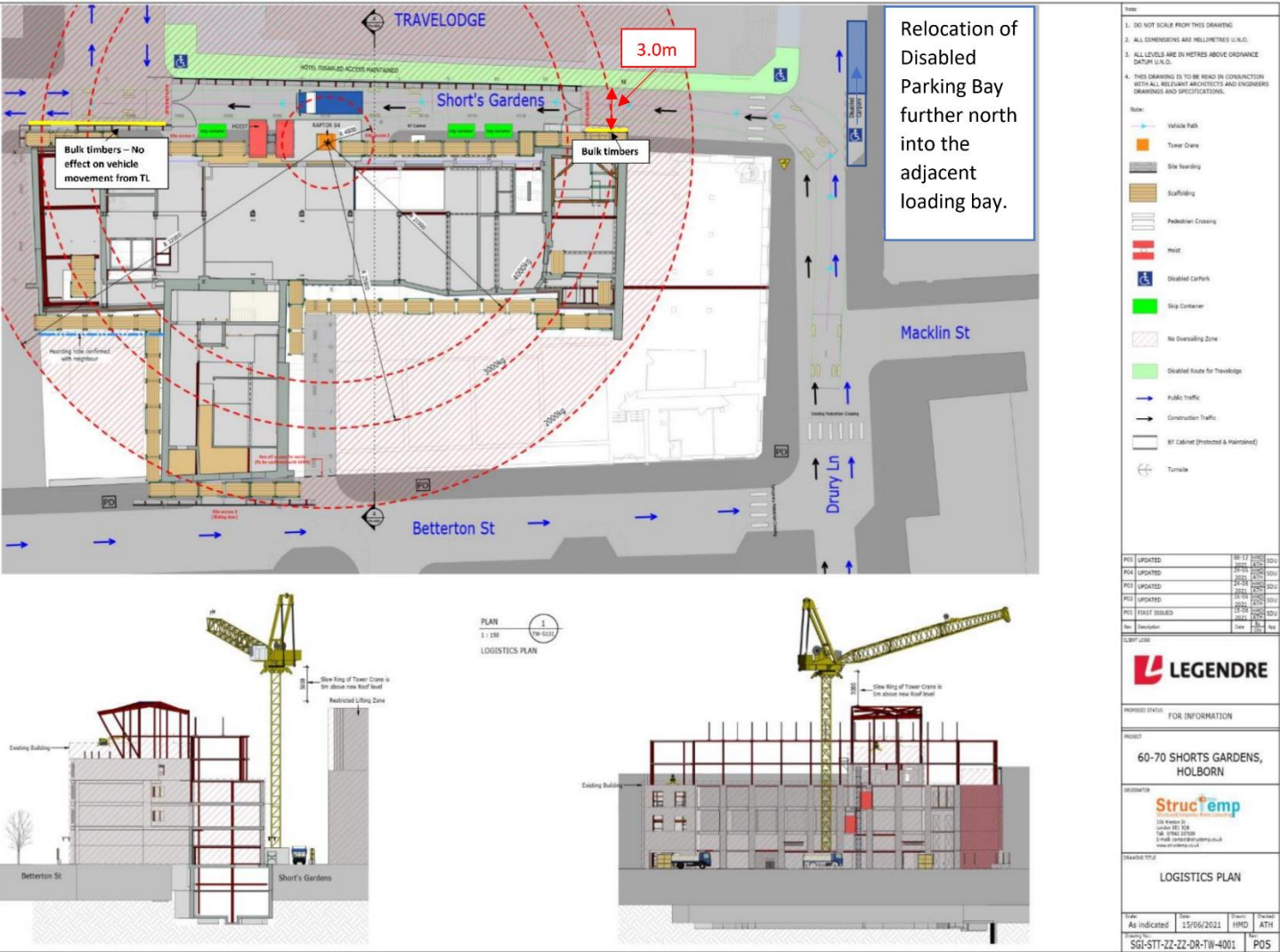
Please submit to: planningobligations@camden.gov.uk

End of form.

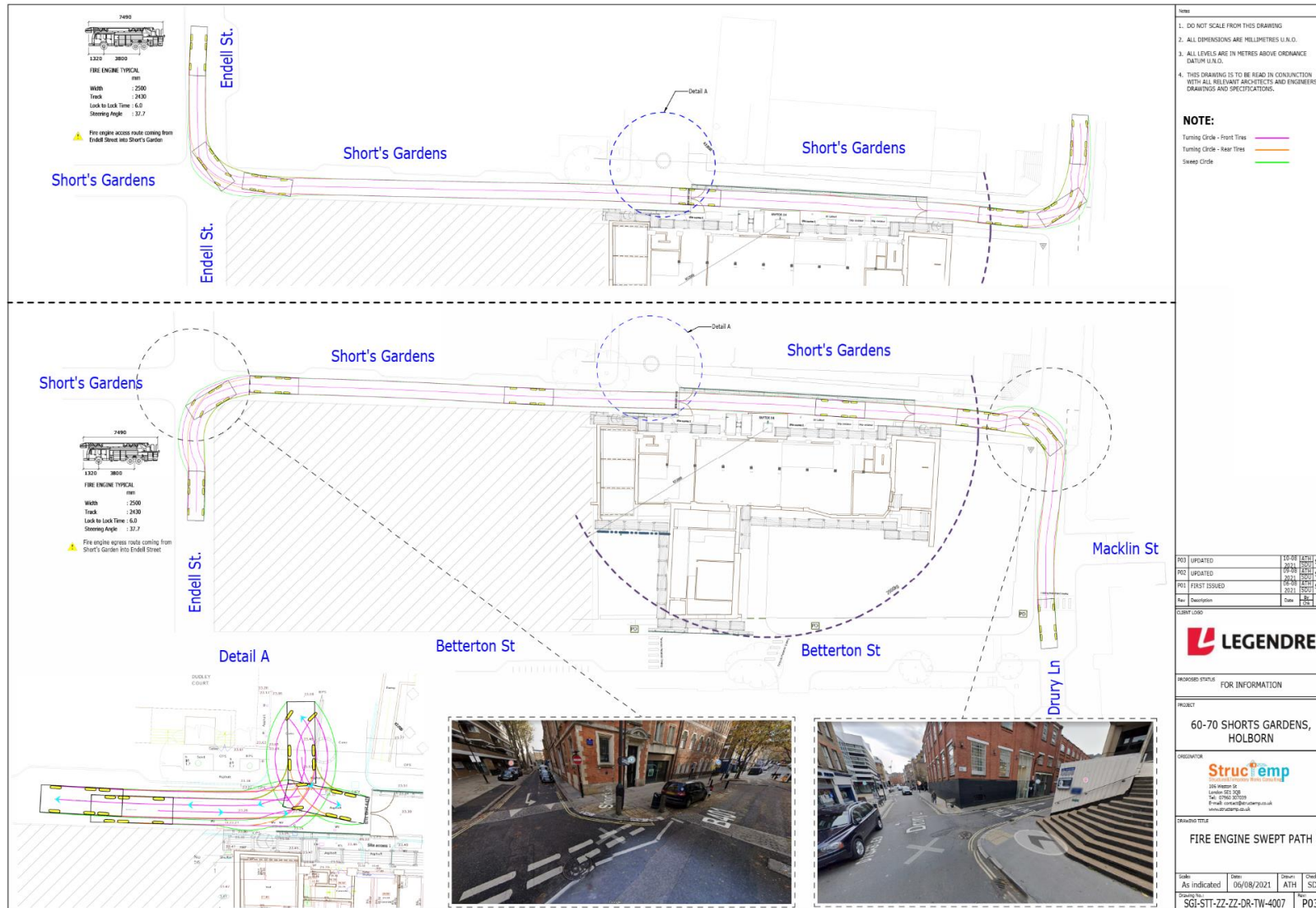
V2.6

Road clos

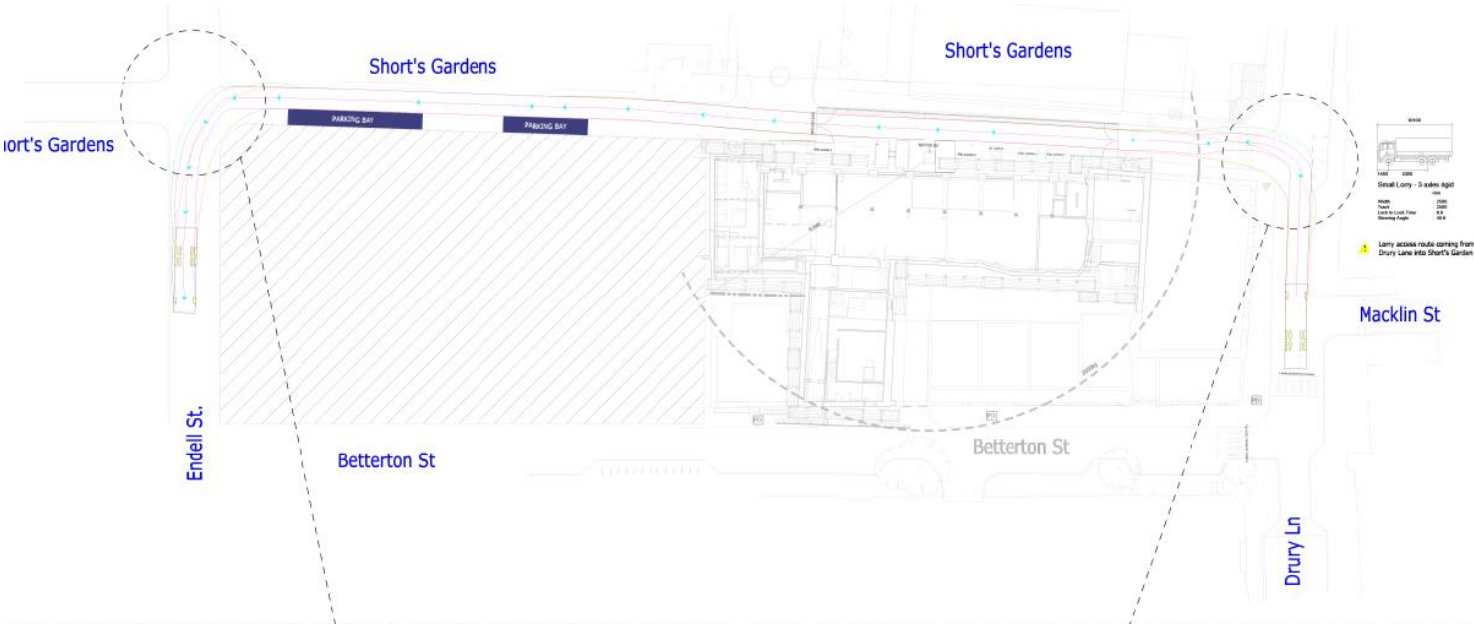
APPENDIX 1 - SITE LOGISTIC AND INSTALLATION



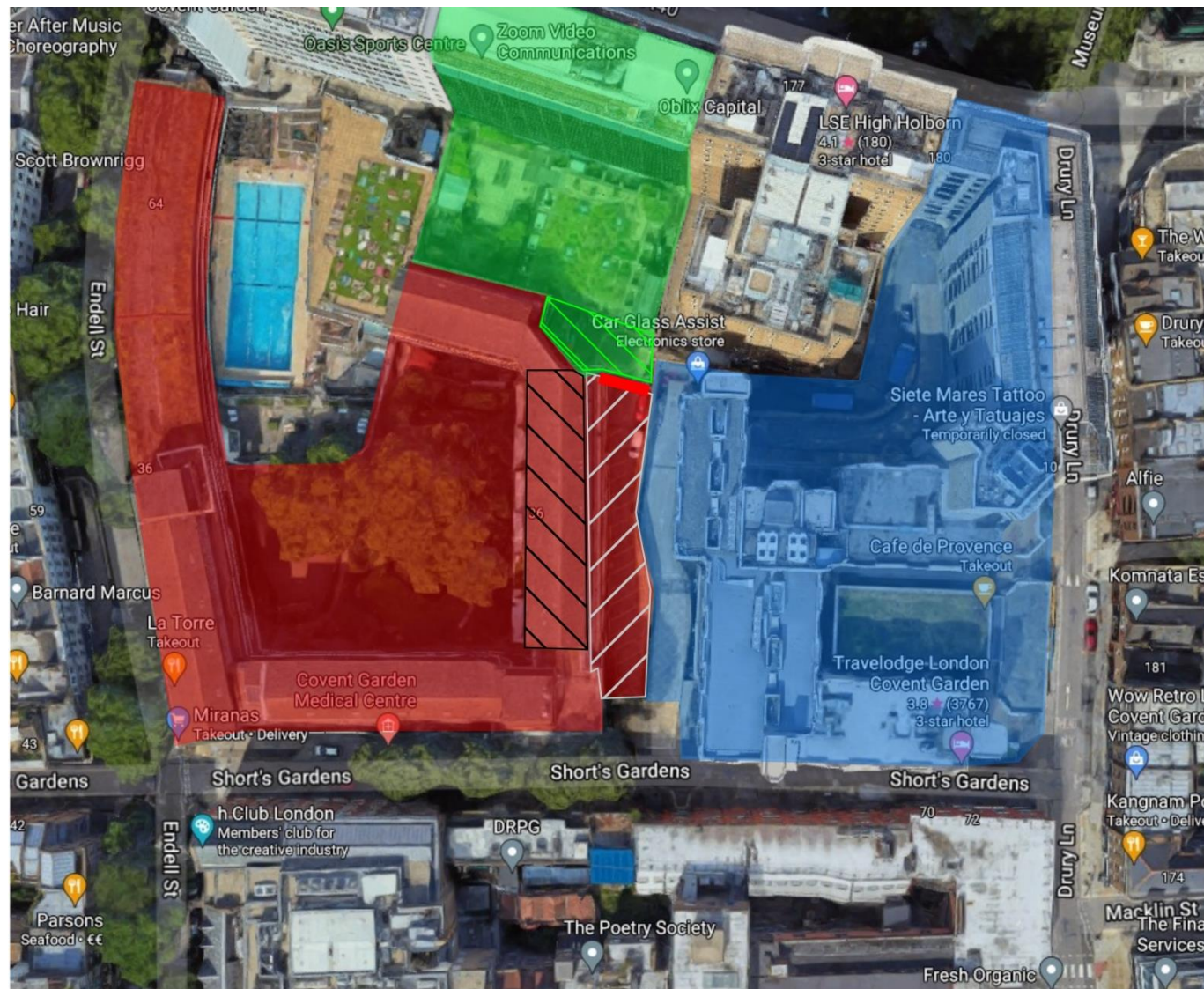
APPENDIX 2 – ACCESS/EGRESS FOR FIRE ENGINE



APPENDIX 3 – LORRY SWEPT PATH



APPENDIX 4 - SITUATIONAL PLAN of NEIGHBORING PREMISES



- (1) Travelodge
- (2) Dudley Court
- (3) Dudley Court carpark
- (4) Access road to Dudley carpark and The Place refuse yard
- (5) Gate to refuse yard
- (6) The Place
- (7) The Place refuse yard (assumed)

APPENDIX 5 – ASBESTOS REPORT EXTRACT

Material Assessment History

Site Name

Shorts Gardens

Project Number

8561/21 DB

Sample Date	Location Ref	Location ID	Area	Floor	Room	Component	Asbestos Type	Material Risk Score	Comments	Action	Survey Type
11/09/19	Sample 1	50174	Shorts Gardens	Third floor	Office	Asbestos Reinforced Composites	Amosite	6	A representative sample of putty to Crittal sash was removed for laboratory bulk sampling analysis from the mezzanine at third floor level. Note: Amosite found in white grainy material attached to putty.	Removal By Licensed Contractors	RDS
11/01/21	Sample 1	50174	Shorts Gardens	Third floor	Office	Asbestos Reinforced Composites	Amosite	6	A representative sample of putty to Crittal sash was removed for laboratory bulk sampling analysis from the mezzanine at third floor level. Note: Amosite found in white grainy material attached to putty.	Removal By Licensed Contractors	RI

2x Inspection(s) for Sample Number: Sample 1