

Construction Management Plan

Contents

Revisions & additional material	3
Introduction	4
Timeframe	6
<u>Contact</u>	7
<u>Site</u>	9
<u>Community liaison</u>	12
<u>Transport</u>	22
<u>Environment</u>	53
Community Liaison, Feedback	60
<u>Agreement</u>	87

Revisions & additional material

Please list all iterations here:

March 2022	0	S Walford
24/3/22	1	S Walford
12/5/22	2	S Walford
23/6/22	3	S Walford (Following Consultation Period and CWG)
8/7/22	4	S Walford (M Lyne comments following consultation incorporated)
26/7/22	5	S Walford (Incorporating agreed parking and highway layouts after discussions between M Lyne and Momentum)
27/7/22	6	S Walford (section 42 completed & environmental comments incorporated)

Additional sheets

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

Date	Version	Produced by

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](#)."

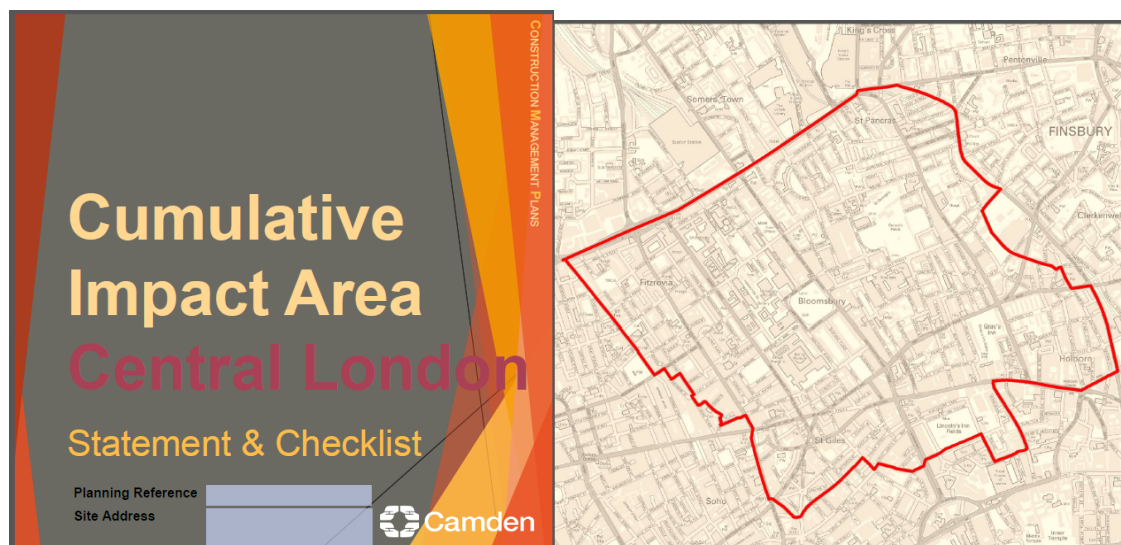
Please complete the questions below with additional sheets, drawings and plans as required. The boxes will expand to accommodate the information provided, so please provide as much information as is necessary. It is preferable if this document, and all additional documents, are completed electronically 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.

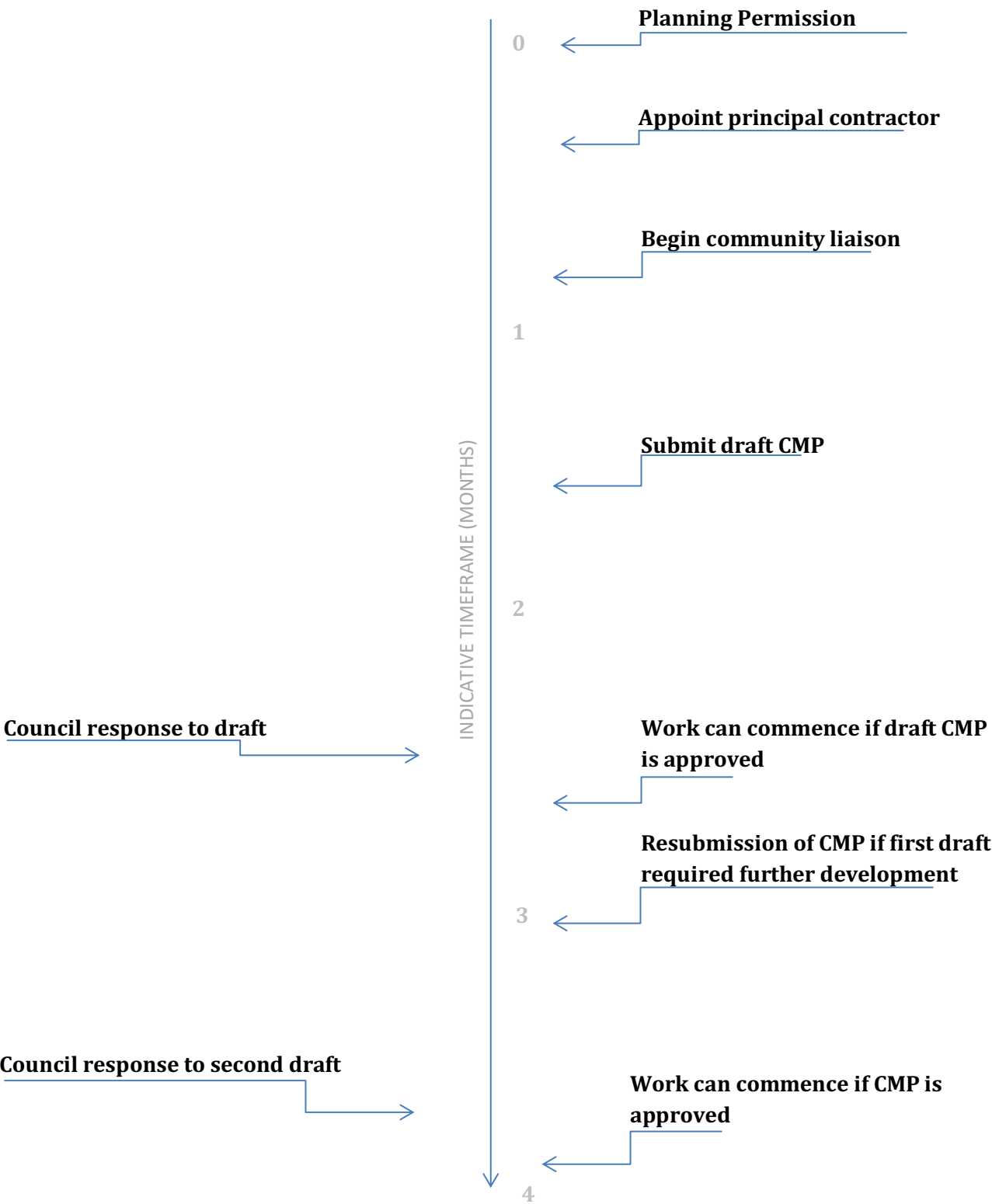
The CIA Checklist can be found at <https://www.camden.gov.uk/about-construction-management-plans>



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: The Fitzrovia, 247 Tottenham Court Road, London, W1T 7QZ

Planning reference number to which the DMP applies: 2020/3583/P

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

Name: Steve Walford

Address: 6 Cavendish Place, London W1G 9NB

Email: steve.walford@kier.co.uk

Phone: 07790941817

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: Steve Walford

Address: 6 Cavendish Place, London W1G 9NB (will change to site address)

Email: steve.walford@kier.co.uk

Phone: 07790941817

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.

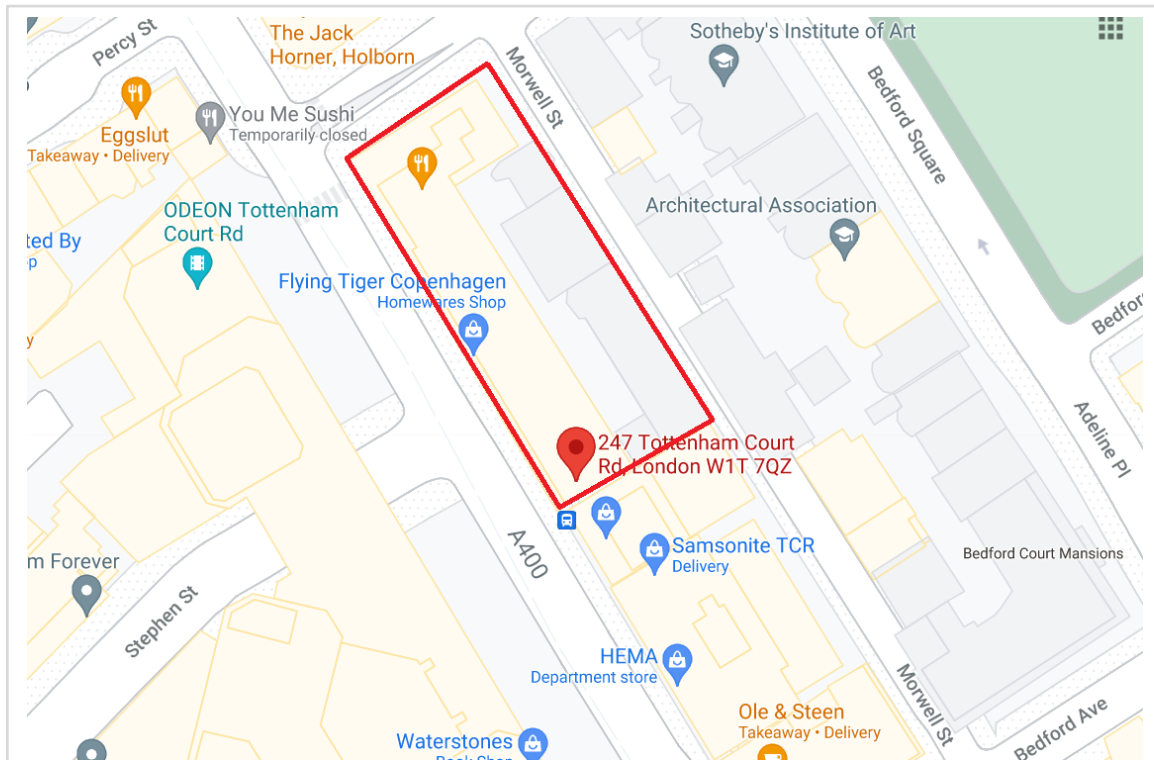
Name:	Chanade Ramsay
Address:	2 Langston Rd, Loughton IG10 3SD
Email:	chanade.ramsay@kier.co.uk
Phone:	0208 5085622

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:	Steve Fox
Address:	2 Langston Rd, Loughton IG10 3SD
Email:	steve.fox@kier.co.uk
Phone:	0208 5085622

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 current site, which incorporates five buildings – 247 Tottenham Court Road, 3 Bayley Street and 1-4 Morwell Street.

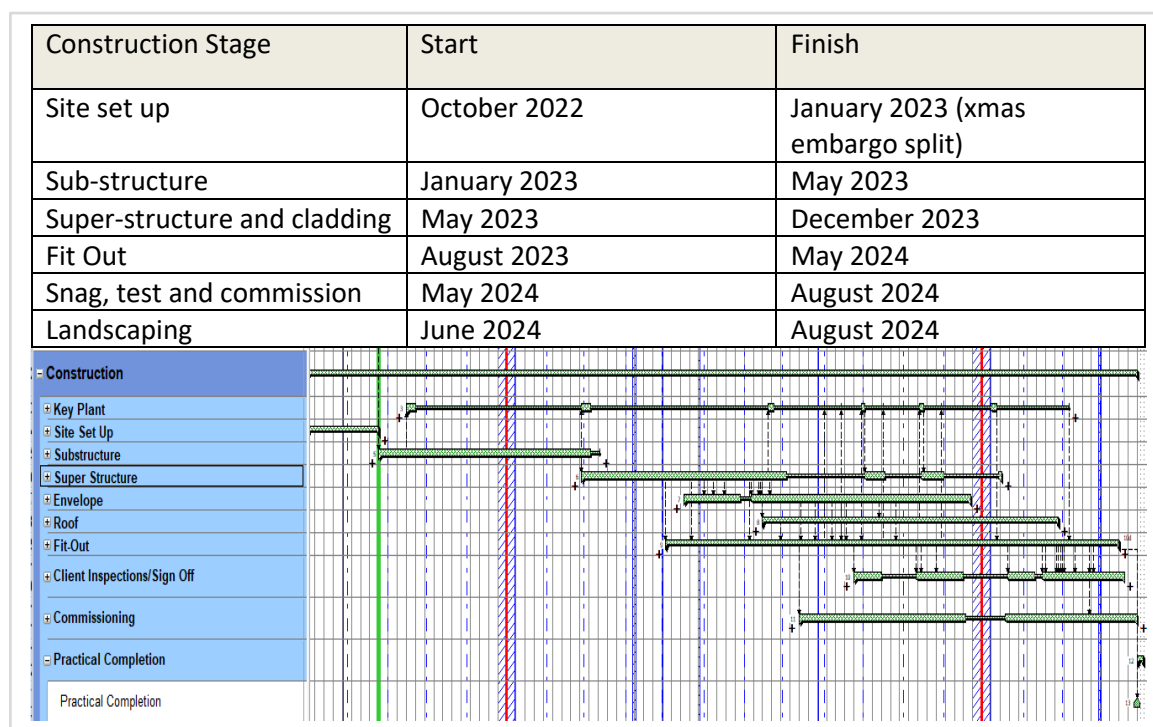
The site is bounded on 3 sides by roads, on the west side, it's Tottenham Court Rd where the current entrance for 247 is located. Bayley Street on the North side is used as a cycle lane and pedestrian only access into Tottenham Court Rd and a less busy Morwell Street located on the east side of the site.

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).

Construction of an 8 storey build of 2 basement levels, ground floor and 5 floors above ground. Approximately 110,00sq' GIFA made up of 8 apartments, 60,000sq' CAT A commercial space with remainder shell and core retail, plant and end of trip facilities.

- Site set up comprising gantry for office and welfare to Tottenham Court Rd with an unloading zone to Morwell St.
- Localised excavation of approximately 1m to core areas and 1.5m to lift pits.
- Construction of in-situ concrete basement box on raft slab with liner walls to existing secant piles, then suspended slab to part basement 1 and ground floor.
- Hybrid superstructure construction utilising pre-cast concrete columns and planks, steel beams, twin wall concrete panels and a concrete topping slab.
- Installation of off-site manufactured pre-cast concrete panels with terracotta, brick and basalt pre-installed along with glazed elements from 1st to 5th floors inclusive.
- Full fit out of the residential apartments.
- Install of 8 lifts
- Full fit out of office floor cores.
- CAT A fit out of commercial floor plates.
- Full fit out of plant areas.
- Full fit out of end of trip facilities.

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).



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

- 8.00am to 6pm on Monday to Friday
- 8.00am to 1.00pm on Saturdays (This will NOT include noisy work or operations that require numerous deliveries to site such as concrete pours.)
- A small number of extra ordinary operations to be completed out of hours such as crane erection and dismantle, welfare install. This will be following consultation with any adjacent construction / demolition sites as well as property owners / occupiers.

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

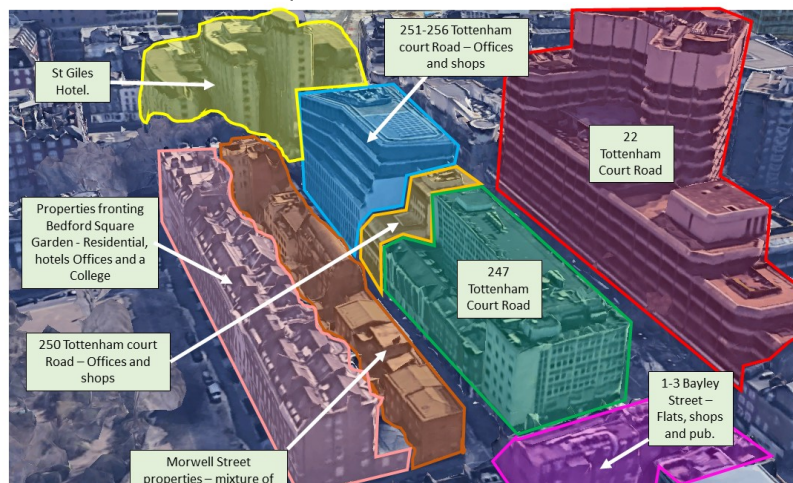
Sites located within high concentrations of construction activity that will attract large numbers of vehicle movements and/or generate significant sustained noise levels should consider establishing contact with other sites in the vicinity in order to manage these impacts.

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.).

- Bedford Square / estates. Kier have been made aware by the clients team and Deconstruct UK that there are particular agreements in place between the employer and Bedford Estates. Kier commit to adhering to these requirements as set out in Section 3 Methodology including working times as described and section 4 Vehicle Routing and Access.
- 248 Tottenham Court Road, this building has a party wall with the development. Kier will take on the responsibility of monitoring the movement, dust and noise implemented by the clients team. It will need to be managed that at no time are any parts of this building exposed to weather during demolition and rebuild durations. Full adherence to party wall award requirements.
- St Giles Hotel, Kier will need to ensure that construction traffic does not impede the ability of coaches serving the St Giles.
- The Jack Horner public House, Gails Kitchen and My Bloomsbury businesses ensuring construction works do not affect their business' including during the mobile crane operations in Bayley St.
- Odeon Cinema Tottenham Court Road, noise monitoring to be reviewed at regular intervals to avoid disruption to cinema viewings.
- Gails Kitchen in Bayley St requires access to loading bay.
- Ecole Jeanine Manuel have young children who we will need to be aware of when managing traffic around the site.
- Residential properties within the surrounding area including Bedford Sq, Bayley St, Morwell St, Bedford Ave & Bloomsbury St.
- The Architectural Association has access requirements via eastern side of Morwell Street for disabled access. Through pre-construction period the AA have been consulted to ensure their requirements can be adhered to.



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.

To date 7 CWG meetings have been held on the following dates:

- 29th April 2021
- 14th June 2021
- 22nd July 2021
- 17th January 2022
- 1 March 2022
- 26th April 2022
- 19th May 2022

Minutes from each meeting have been shared with CWG members. They can be issued to other interested parties upon request.

Discussions and agreements have also been held with Bedford Estates directly which have resulted in an agreement and included within this CMP.

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.

A CWG including but not limited the following stake holders will be proceed on a monthly basis and will be chaired by LCA (London Communications).

Kier would attend and present the works to date and upcoming works in the period whilst also taking questions and discussing concerns of those present in support of Momentum.

- Ward Councillors
- Representatives of local residents – Bedford Estates.
- Other construction sites that may commence work in the vicinity of the development.
- Architectural Association

The main construction site adjacent to the 247 Tottenham Court Road site is the ongoing works around and above Tottenham Court Road station. Kier will set up communication with this construction team at Laing O'Rourke to ensure works do not contradict each other.

Kier will monitor and feed into the London Borough of Camden West End Project team notifying them of our upcoming works and liaising with the works they are aware of the avoid impacting local residents.

Kier are happy to work with any working groups that London Borough of Camden wish attending and reporting to monthly meetings as required.

Demolition Management Plan

As part of the first phase of works at 247 Tottenham Court Road, a Demolition Management Plan (DMP) was submitted and approved to guide the removal of the existing buildings on site. A public consultation was undertaken between 29 July – 12 August 2021.

In line with best practice, the project team has followed the same engagement programme and activities for the Construction Management Plan (CMP) public consultation.

Consultation on draft Construction Management Plan

On Thursday 19 May, a (virtual) Construction Working Group (CWG) meeting was arranged with key community representatives, to discuss the contents of the CMP and notify them of the upcoming public consultation. The latest iteration of the Plan (that went out to consultation) was shared with members in advance of the meeting to guide the discussion.

During the meeting, discussions focused on:

- **Construction Routes:** Enquiries on whether construction vehicles will continue to use the existing routes to access and leave the site.

- **Impact on the local area:** Concerns that ongoing works and the movement of heavier construction vehicles could adversely affect surrounding streets and schools, such as Ecole Jeannie Manuel.
- **Public Consultation on CMP:** An update on whether residents would be given an opportunity to comment on the CMP once the public consultation closed.
- **Morwell Street:** Questions on how limited access to Morwell Street could affect local residents and the Architectural Association (AA). It was noted that the AA uses the street for deliveries and general maintenance works around their campus.
- **Main Contractor:** Request for further information about the company leading the main construction works and who will be the primary contact for the community moving forward.

Since the first CWG meeting in April 2021, seven have been organised in total. Four of these have been arranged since the turn of the year. In meetings, discussions have centred on the construction programme and current/upcoming operations on site. Residents are encouraged to get in touch with the project team separately with any questions they have, speak with the on-site Do we project managers and arrange meetings with the wider team (as and when required).

Construction Management Plan Public Consultation

To promote the consultation with key stakeholders and neighbours of the site, information was shared on the draft CMP on the project website and a newsletter was issued to the local community. The project team also offered to meet with individual groups and persons as and where required.

A variety of channels were employed to promote the consultation to maximise engagement with the local community, which are detailed below:

- **Consultation newsletter** – The CMP was promoted through a two-page newsletter distributed to 2,336 households and businesses covering a 1.5-mile radius area around the site, on 24 May 2022.
 - a. The newsletter provided details of the proposed construction programme and timeline, as well as information on how to download a copy of the draft CMP and information on how they can provide their comments with a stated deadline of 7 June 2022. This allowed the local community two weeks to provide their feedback on the CMP.
 - b. A copy of the newsletter and map showing the distribution area can be found in the Appendices at the end of this document.
- **Stakeholder letters** – Copies of the newsletter were sent alongside personalised letters to a number of key stakeholders, local businesses and community groups notifying them of the CMP consultation.

- **Website** – The pre-application consultation website was significantly updated – www.247tottenhamcourtroad.co.uk – and included detailed information on the construction programme and key details of the CMP along with contact information to submit comments on the CMP. The CMP was made available to download for those who wanted to review it in more detail. The website update was launched on 24 May 2022, in line with when the local community received the hand-delivered newsletter.
- **Stakeholder meetings** – Residents were invited to meet separately with the project team to discuss specific areas of the CMP. **A meeting was organised with the Architectural Association on Monday 27 June.**
- **Feedback mechanisms** – Local stakeholders were encouraged to provide feedback on the CMP consultation through a variety of means; using the Freephone service (0800 307 7548) emailing the consultation address (247tottenhamcourtroad@londoncommunications.co.uk), or filling out a feedback form on the project website.

Feedback summary

Consultation Responses:

During the two-week consultation period (24 May – 7 June 2022), we received six comments from local stakeholders. All feedback was sent to the consultation email address.

Transportation routes

The stakeholder requested that the primary access routes to the site are changed to run through Tottenham Court Road.

Response: *Over the last year, we have been using the current transportation routes through Bedford Square / Bedford Avenue / Gower Street to access the site. During this time, no issues have been raised by the local community or Camden Council with regards to increased traffic, congestion, noise or vibration disturbances. Monitoring equipment has been installed across the local area to monitor activity and any potential disruptions caused by the movement of larger vehicles to and from 247 Tottenham Court Road. In discussion with Camden Council, it was concluded this remains the only viable route to the site. In section 18 Site Traffic of this CMP, the project team has listed the other mitigation measures they will be employing to ensure vehicles continue to adhere to the highest safety standards.*

Servicing for local businesses

A stakeholder raised concerns the proposed construction routes would affect servicing to local businesses, My Hotel, and St Giles Hotel and The Jack Horner Public House.

Another suggested a Temporary Traffic Order was considered to ban coaches from accessing Bedford Square / Adeline Place / Bedford Avenue.

Response: *These issues were raised by stakeholders in response to the consultation. These points are for LB Camden to decide on. Any further would be directed by LB Camden.*

Timings of work

The stakeholder asked that working hours are changed to 09:30am – 4pm on weekdays.

Response: *We have proposed that works will be carried out in line with Camden's standard permitted hours for building works, as detailed in section 19 on page 31. Control of site traffic, particularly at peak hours of this CMP. As and when works are required outside of normal working hours, these will be agreed beforehand with Camden Council. Advanced notice of these operations will also be shared with the local community.*

Healthy School Street, Bedford Square

The stakeholder indicated the Healthy School Street location had not been included in the CMP.

Response: *Although the construction routes do not run through the zone, the project team is happy to update the CMP to include the Healthy School Street area.*

Impact on Bedford Square

The stakeholder raised concerns that the draft CMP did not take into account the potential damage to Bedford Square and other local heritage assets.

Response: *The team has committed to only use the eastern side of Bedford Square, to reduce vehicle movements and any potential impact to Bedford Square and other historical landmarks. Monitoring equipment will continue to be in operation around the area as well, to analyse activity. Further information on other mitigation measures can be found in the environment section starting on page 51. There are no further mitigation measures mentioned the routes planned are public highways and the vehicles used will be compliant to use on public highways. The monitoring is to ensure no damage is caused.*

Pedestrian footpath, Morwell Street

A stakeholder enquired if the footpath along Morwell Street will be open to the public as construction works take place. They noted this was an essential route for students and staff at the Architectural Association.

Response: *Although there might be times when the footpath is closed temporarily as operations take place on site, it is our intention to keep it open to the public as construction works progress.*

For further information, see the transport section starting on page 24. The West side of the footpath adjacent to the site will be closed to compensate for this during working hours the East side of the footpath will be extended into the carriageway using ramps and barriers. A crossing point utilising a ramp up to the kerb will also be used during daytime operation see the Traffic Routing section on page 24.

Access to Morwell Street

A stakeholder requested that the Architectural Association is permitted to receive deliveries through Morwell Street during the next phase of works. They also said the school will need access to the street throughout the year to place a skip and ensure their refuse and recycling collection facilities remain unaffected.

Response: *Following discussions with the stakeholder, it was agreed they will be able to continue to facilitate deliveries via Morwell Street as and when required. Advanced notice will be given to the project team, who will book a time slot (agreed with the Architectural Association). It was also noted that most deliveries to the school are made via Bedford Square and the area allocated for skips on Morwell Street is not located in the immediate work area.*

Notification of works on Morwell Street

A stakeholder said residents living along Morwell Street should be informed when the road is closed and of any major operations that will affect the area at least two weeks beforehand.

Response: *Local residents, including those living along Morwell Street, will continue to be given advanced notice of major works taking place on site.*

Deliveries during school times

The stakeholder requested no deliveries were made to the site during peak school hours (08:30 – 09:30am / 3 – 4pm).

Response: *Under the approved DMP, no restrictions were placed on the timings of deliveries to the site. All contractors and drivers will be required to book a timeslot to access 247 Tottenham Court Road through a booking system, to deliver and unload materials. Further information can be found in the transport section starting on page 21.*

Number of vehicles accessing the site

A stakeholder enquired how many vehicles are likely to access the site each day.

Response: *See the Traffic Routing section on page 24 (table of deliveries) of this CMP for information on our studies and analysis of vehicle movements to and from the site.*

Movement of larger vehicles

A stakeholder raised concerns that the use of larger vehicles would create more disturbances in the local area.

Response: See the Traffic Routing section on page 24 of this CMP for information on how we will minimise the use of larger construction vehicles during the construction programme.

Impact on local cyclists

The stakeholder enquired what impact the movement of construction vehicles might have on people using the cycle routes around Tottenham Court Road and Bedford Avenue.

Response: In the transport section of this CMP, starting on page 23, we have listed the mitigation measures that will be used to reduce the potential impact construction vehicles will have on cyclists and local cycle routes. We need to discuss this as no mitigation is planned as the SWA shows no clashes with surrounding area with 1 exception the road legal articulated drawing SWA that requires extra marshalling. The route is same as DMP as requested by Camden as TCR is a busier pedestrian and cycle route the planned route.

Residents in the local area

A stakeholder said the drawings in the CMP do not reference residents' homes along Bedford Square / Bedford Avenue / Adeline Place / Morwell Street.

Response: The CMP has been updated to reference the people living on these, and other neighbouring streets close to the site.

Bedford Court Mansion vaults

The stakeholder requested a sensitive receptor is fitted into one of the pavement vaults along Bedford Avenue.

Response: We are discussing this with the stakeholder and will respond to them separately.

Noise, dust and vibration monitoring results

A stakeholder requested the monitoring results for noise, dust and vibration caused by works on site are shared with the Construction Working Group.

Response: The reports are accessible from the project website. We are happy to discuss sharing the information with CWG members as part of the monthly planning update as well.

Next steps

Following the submission of the updated CMP, we intend on taking the following steps:

- Continue liaising with stakeholders to provide updates on the construction programme and management.
- Hold regular meetings with the CWG and continue to send members a monthly planning update of current and upcoming works.

- Issue regular construction newsletters to all those addresses previously notified with key milestone updates on the construction programme.
- Continue to update the website to reflect the latest updates on the construction programme.

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.

The scheme will be registered as a CCS Ultra site nearer the time of starting on site. Additionally, Kier implement a mini site bonus scheme where if a site gets a score of 42 the operations team get £40 each for a site night out.

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 major construction sites within close proximity to the site (at the time of writing) that are considered to have an impact in the vicinity of the site. However, the Tottenham Court Road station development works will be monitored to ensure no cumulative impact to the area.

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.

15. Name of Principal contractor:

Kier Construction London, South & Strategic Projects

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

The initial check on the implementation of the CLOCS Standards will be that this requirement is included within the preamble and scope of works documents included within all tender enquiry packs.

During all sub-contract negotiations this requirement will be discussed and the sub-contractor will be required in post tender interview to demonstrate their understanding of this requirement and how they comply.

Once on site Kier will employ a specialist logistics company including a site dedicated logistics manager. One of the key roles of this manager and company will be to implement a delivery booking system such as Datascope. All sub-contractor deliveries will then need to be booked onto this system. When booking the delivery the following information will be required. Type of vehicle along with CLOCs / FORS accreditation, place of origin so that carbon footprint of trip can be logged. Time of delivery and type of load along with unloading method.

6 weeks prior to practical completion when main site compound is removed this will revert to booking with the manager on a laptop as the system will be decommissioned. At this time though deliveries will be minimal with small snagging materials and commissioning equipment.

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:

Kier confirm they understand the CLOCs requirements.

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.

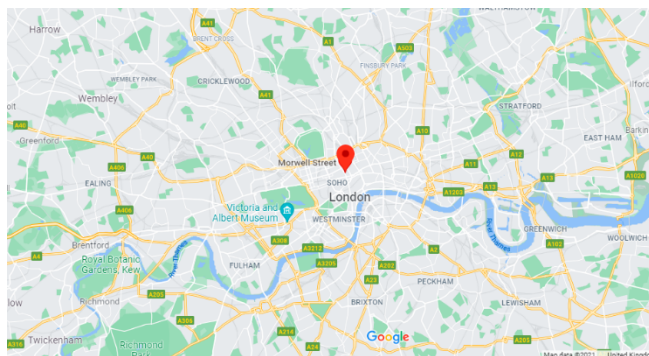
Routes should be shown clearly on a map, with approach and departure routes clearly marked. If this is attached, use the following space to reference its location in the appendices.

Dedicated vehicle routes will be included in the logistics document issued to supply chain members as part of their sub-contract order. This will include material suppliers and sub-contractors.

Adherence to dedicated routes can be checked with delivery vehicle onboard tracker (TACO). Alternatively, the vehicle sat nav could be used to ensure the route has been programmed correctly. Our logistics manager will do spot checks on delivery vehicle satellite navigation systems to ensure the agreed routes are being followed.

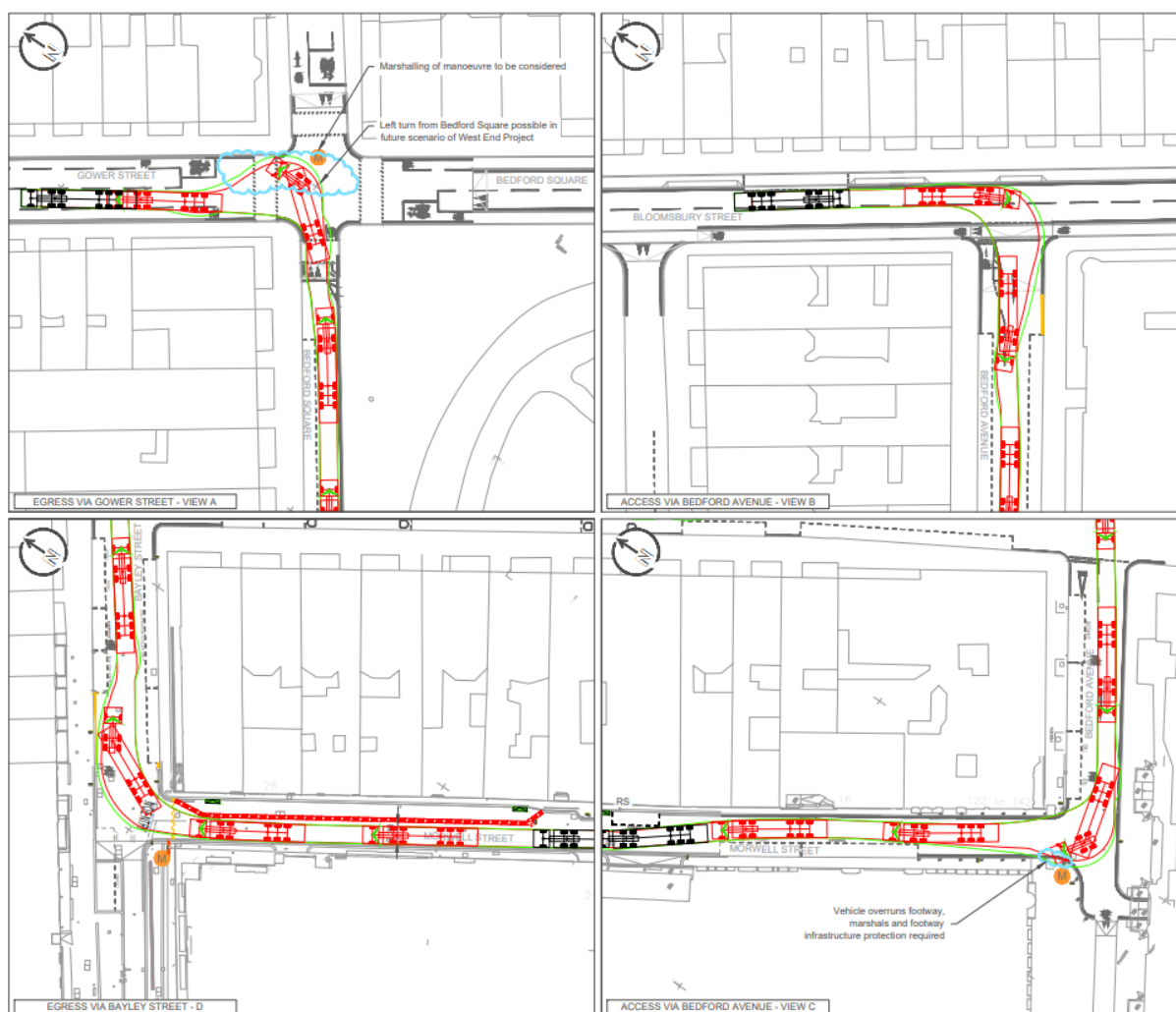
Noting the use of pre glazed double punch windows within prefinished brickwork, basalt and terracotta which is coming from different parts of Europe (basalt Sicily, bricks Denmark, Terracotta Germany), the decision has been made to use a PCC manufacturing facility within Belgium where all the constituent parts can be pre-assembled prior to transport to the UK. The main transport to UK will be by shipping to the DP World port in Tilbury Essex. A consolidation centre within the port such as Wilson James will then be employed to hold the trailer beds with the panels pre-loaded. From this consolidation centre the trailer beds will be brought to site by tractor unit and façade installed to final position straight from the delivery trailer. However the general approach is to avoid the consolidation centre wherever possible and to use only when interruption to ferry crossings is forecast.

The site is ideally located for delivery vehicles to use the planned 1-way system of A400 into Bedford Ave, then Bedford Sq back onto the A400. The A400 leads to the A501 which in turn allows access to the North circular for routes to midlands and North. The Westway for routes West, then the A13 for routes East including Tilbury docks. Where it is envisaged the PCC panels will be delivered to. As well as routes to Southern England by way of M25 and the Dartford Bridge.



A swept path analysis has been completed on a fully articulated delivery wagon , as well as a shorter bespoke vehicle for the pre cast concrete façade panels for access from the A400 onto Bedford Ave into Morwell St, then right turn into Bedford Sq and back onto the A400. These tracking drawings are included within the appendices.

Noting the nature of these streets vehicle speeds will be naturally limited. To ensure though that delivery vehicles keep to a permitted speed all sub-contract orders will include the statement in the logistics plan. "All delivery vehicles using Bedford Square and the block bounded by Great Russell Street, Tottenham Court Road, Store Street and Gower/Bloomsbury Street shall not exceed a speed of 20mph. If any complaints from local neighbours of the site note their dissatisfaction of a delivery vehicle with either the clients team or Kier then evidence of the vehicles Tachographs will need to be supplied to all parties". The delivery vehicle can be identified using the site logistics system Datascope where each company needs to book their delivery in a 1 hour slot.



It can be seen from the above SWA that if standard articulated vehicles are used there are 2 points in the route which will have a minor impact on the surrounding area. Therefore, vehicle deliveries into site have been reviewed in line with discussions held previously between Deconstruct UK and LB Camden Highways.

2 traffic marshals will be employed on site. 1 will be stationed to the junction of Morwell St and Bayley St operating the pit lane barriers. 1 will be stationed at the junction of Morwell St and Bedford Ave. This operative will assist with the manoeuvring of Kier construction site traffic

around this junction as well as the turning of 3rd party delivery vehicles, whilst coaches continue to use Bedford Av to pick up/drop off, it will be the responsibility of the Kier traffic marshal to either oversee these reversing into the western section of Bedford Av. so that they can drop passengers on the northern kerb line, or reversing back onto Adeline Place if passengers have been dropped on the southern kerb line of BA. It should be noted there will be 2no 30 minute periods each day when this position is unmanned due to break times. However these breaks will be outside the opening and closing hours of the Ecole Janine School to ensure there is a marshal stationed here when children are being dropped off or picked up.

Kier have agreed with supply chain that the following vehicles will be used to avoid standard articulated trailers wherever possible.

- Precast concrete façade panels – 7.50m trailers reduced length
- Reinforcement ‘city trailers’ which have rear wheel steer.
- PCE – ‘city trailers’ with rear wheel steer.

A table of the deliveries with week numbers is shown below.

Build Stage	Week No's	Number of deliveries	Vehicle type
Sub structure			
Plant delivery	1	3	13m articulated
Reinforcement delivery	2-18	3 per week	Rear wheel steer articulated
Reinforcement delivery	19-21	1 per week	Rear wheel steer articulated
Plant collection	22	3	13m articulated
Super structure			
Column / plank / twin wall	22-38	10 per week	Rear wheel steer articulated
Reinforcement and twin wall	39-41	3 per week	Rear wheel steer articulated
Facade			

Pre cast columns and spandrels	41-42	10 per week	V trailer shorter trailer
7.3m long double punch panels	43- 52	20 per week	V trailer shorter trailer
Roof			
Insulation	45-48	1 each Saturday	Standard articulated

In addition to the above we will arrange for all of the following materials to be delivered on smaller non articulated vehicles as this is possible:

- Blocks
- Mortar
- Plasterboard
- Insulation
- Screed
- Doors / joinery
- Stone / tiles
- Kitchens
- Sanitary ware
- Raised Access Floor
- Duct / pipes and electrical containment
- Cables
- Roof covering
- Glazed elements to ground floor and balconies

A review of routes to site has been considered in full by the client team with DCUK and the findings are below.

Route	Key Considerations	Camden conclusion
Tottenham Court Road	Compromises West End Project traffic restrictions and public realm enhancements	Not viable
Gower St, Bedford Avenue, Bedford Square	Local stakeholder opposition due to amenity and potential heritage impact	Traffic legal and viable
Adeline Place	Would require a Temporary TMO to allow northbound movement through Adeline Place which could not be controlled to allow construction vehicles only and hence may allow for rat-running through Bedford Square.	Negative impacts do not outweigh benefit

Adeline Place	Coach pick up / drop off from the St Giles hotel to be relocated to Adeline Place to avoid need for coaches to use Morwell St and the restricted width adjacent to Kier unloading zone.	Agreed it works
Percy St for ingress*	Major works required to Bayley St/Tottenham Court Rd junction and public realm, including impact on gantry and loading bay.	Negative impacts do not outweigh benefit
Store St for egress*	Major works required to Bayley St/Tottenham Court Rd junction and public realm, including impact on gantry and loading bay. Impact on retail, residential and other amenity especially along Store Street.	Negative impacts do not outweigh benefit

The Construction Management Plan submitted as part of the planning application presented three routing options, using Tottenham Court Road (then Bedford Avenue, Morwell St, Bayley St, and Tottenham Court Road);

Using Gower Street (then Bedford Avenue, Morwell St and Bedford Square); and the third a hybrid of the first two.

In the committee report, Camden's Principal Highways Officer noted that LB Camden has studied various options for vehicle routing and noted that the preferred route was via Gower Street, Bedford Avenue, Morwell St, and Bedford Square, with a second preferred route via Adeline Place to the south. It was recommended that a Construction Working Group be set up, and this was secured via Section 106 Legal Obligation (clause 4.7.1) and set up after the planning committee which recommended approval, but prior to the completion of the Legal Agreement. To date, three CWGs have been held.

Tottenham Court Road

The route that was initially proposed in the first pre-planning Construction Management Plan was for vehicles to use Tottenham Court Road, accessing Morwell Street via Bedford Square and egressing via Bayley Street. This would require a dispensation from Camden regarding the West End Project traffic restrictions. After ongoing liaison with LB Camden both pre and post-committee, it is clear that dispensation from the WEP restrictions was not acceptable as this would set a precedent for further dispensations. Further, the junctions at Bayley St and Bedford Avenue with Tottenham Court Road would require management and re-working to facilitate vehicle access; both of these junctions have been recently completed as vehicle-free junctions with improved cyclist facility and public realm. These would need to be reversed to facilitate vehicular access and reinstated on completion of the development. Finally, Tottenham Court Road is a busy and popular pedestrian and cyclist road, and large construction vehicles using and manoeuvring across Tottenham Court Road would impact on these vulnerable road users.

Gower Street

This route would use Bedford Avenue, Morwell Street, Bayley Street and Gower Street. Of the options, it is the only route which would conform to all existing traffic restrictions. A number of stakeholders have

raised amenity and heritage concerns about the use of this route, including regarding the impact of vibration from vehicles on heritage assets.

Adeline Place

This route would involve vehicles arriving from the south and travelling northbound on Adeline Place. Egress would be via Bedford Square and onto Gower Street. WEP traffic restrictions currently only allow vehicles to travel southbound on Adeline Place, meaning a Temporary Traffic Management Order would be required to enable northbound vehicle access. Camden feedback is that this would not be acceptable as it would enable rat-running through Bedford Square and also impact on St Giles Circus junction, with resulting impact on TfL bus journey times.

Proposed Route

See images below site traffic will operate in a one way system, heading southbound down Bloomsbury St, turning right into Bedford Avenue and then into Morwell St on the right. Egress: Exit site heading northbounds on Morwell St, turn right at junction onto Bayley Street and left at the Gower Street junction.

This proposed route is the only traffic-legal route available, with all of the above alternative routes considered requiring changes to traffic regulations. This route can accommodate larger vehicle manoeuvres, as it was designed as part of the WEP to allow for coach vehicle access to a hotel on Bedford Avenue. Further, it avoids the use of Tottenham Court Road in its entirety, which both supports the WEP and avoids conflict risk with the high number of pedestrians and cyclists using Tottenham Court Road – Camden's counters show significantly higher cyclist demand on Tottenham Court Road than Gower Street.

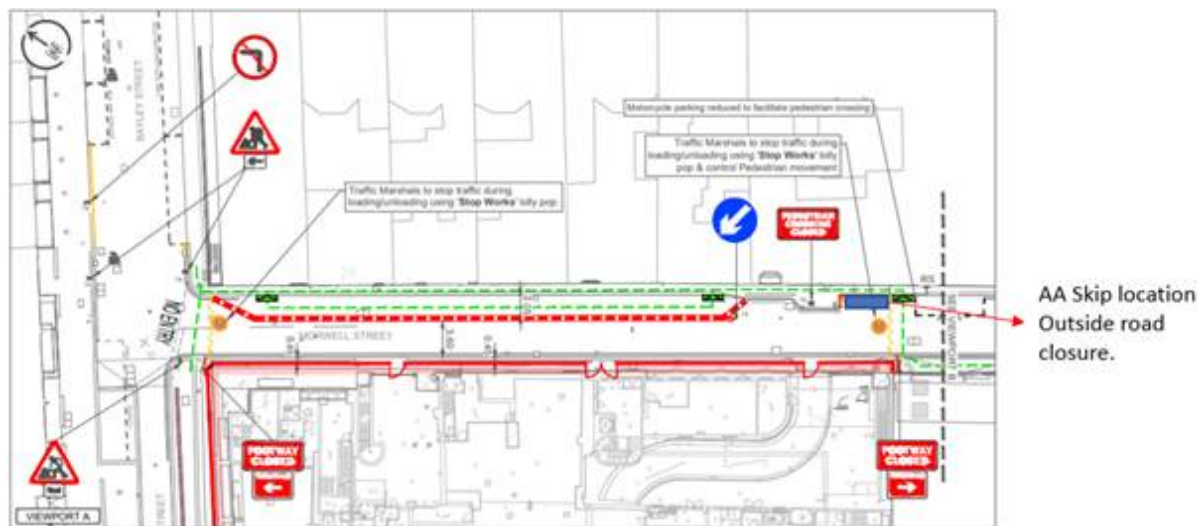


During the May '22 CWG a group member raised a query how a small number of businesses could be serviced during the day time road closure of the North end of Morwell St namely the MyHotel and The Jack Horner public House. There are we believe two options here either their deliveries could be allowed

through footpath extension of Morwell St as the barriers will be movable, or if these delivery vehicles are suitable they could use the wider carriageway from Bedford Ave, into Bedford Sq West side, then into Bailey St.

The St Giles hotel was also raised as concern regards deliveries, however we do not believe at this time they will be impacted by the proposed CMP.

The Architects Association skips and deliveries were also noted a potential clash with site works in Morwell St. It has been agreed, the deliveries to Architects Association will continue as currently organised to both Bedford Sq and when required to Morwell St for elements such as timber and MDF. This will be managed when Morwell St required by Kier logistics manager. Skips are currently placed adjacent to the AA entrance on Morwell St as rubbish is brought to this point from a number of locations within the AA building. The position currently used by AA does not fall within the road closure area planned by Kier within the CMP so no affect is currently foreseen, this position can continue to be used. Please see diagram below identifying skip location.



Furthermore a number of changes will be made to available parking and highway markings to improve the roads around the development during the TTO and construction period. The attached Appendix M000431-2-1-DR-009-G identifies these changes as agreed with LB Camden highways team. The changes are as listed below:

Morwell Street south of the closure and Bedford Sq west of Adeline Place to be 2-way operation to allow for egress of parked vehicles

- Loading bay on-street primarily for 1 Bedford Avenue moved to Bedford Square
- Taxi bays currently on Bedford Square proposed to be relocated temporarily to Morwell Street
- Bedford Square's western side's east footway proposed to have new temporary provision for the relocated motorcycle bays on Bedford Square southern side and from Morwell Street, as well as one car club bay relocated from Bayley Street
- Morwell Street with ramp across Morwell Street to ensure access to the build out on the eastern side of Morwell Street for access to the AA rear access
- Changes to Adeline Place for the coach arrangement are included within the TTO proposals as a back-up and are not proposed to be initially implemented

The changes to the amounts of parking are also shown in the 2 tables below.

Parking Bays	Gains		Losses	
	Pay and Display	Resident Permit	Pay and Display	Resident Permit
Great Russel Street			-12.35	
Adeline Place				-21.55
Bedford Avenue			-9.75	
Morwell Street		6.6	-46.7	
Bedford Square				
Bayley Street				-10.7
Total	0	6.6	-68.8	-32.25

Motorcycle Bays	Gains	Losses
Bedford Avenue		-5.6
Morwell Street		-11.9
Bedford Square	17.5	
Bayley Street	3.95	
Total	21.45	-17.5

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 material purchase orders and sub-contract orders will include a site logistics plan. This will form part of their contract documents. The logistics plan will include on site works and unloading areas as well as access to site with planned routes acceptable to LB Camden and local residents in line with the example dry run of an articulated vehicle through the surrounding roads carried out by Deconstruct UK as the requirement of the DMP for the scheme.

The site delivery booking system will prevent vehicles attending site when no space is available to unload and then vehicles waiting in the surrounding area.

In the event that a crane breaks down and a wagon is unable to unload and clear for the next vehicle it will be the responsibility of the logistics manager to advise the follow on vehicles to return to depot to avoid congestion in the area.

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

Artic: plant and tower crane delivery at start of project, 1 delivery/day during main construction phase project

18t flatbed: 2 deliveries/week for duration of project

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

The site has been planned to allow 2 vehicles to unload concurrently within Morwell St. Each unloading bay will have Tower crane allocated along with a slot on the logistics booking system. The deliveries will be planned in phases as an overview the below table will indicate the number of deliveries each day.

Construction Stage	Duration		No. of trips Daily	No. of trips in month
Site set up	October 2022	January 2023 (xmas embargo split)	6	20
Sub-structure	January 2023	May 2023	25 (worst case majority days significantly less)	500 (maximum)
Super-structure and cladding	May 2023	December 2023	10	225
Fit Out	August 2023	May 2024	8	170
Snag, test and commission	May 2024	August 2024	5	75
Landscaping	June 2024	August 2024	2	20

The above are worst case with daily numbers expected to be below these figures majority of days.

2 vehicles will be let into the loading bay just prior to 08:00 and then engines will be turned off.

It will generally take a number of hours to unload the vehicles associated with superstructure and façade works, this is the reason there are relatively few deliveries each day.

Fit out vehicles similarly will take at least 1 hour to unload so the pre 09:30 delivery time embargos can be adhered to during this stage of work and majority of the sub-structure if 2 deliveries are on site prior to this time each day and the 2 final deliveries leave site after school hours between 17:00 and 18:00.

The only point of discussion and agreement with Camden would be days of concrete pours to slabs. Noting the 18:00 restriction and Kiers wish to avoid disruption outside the planning permitted hours concrete pours would need to begin prior to this time. Kier will take all required measure to reduce these occurrences by splitting the pours into as small an area the engineering of the building allows.

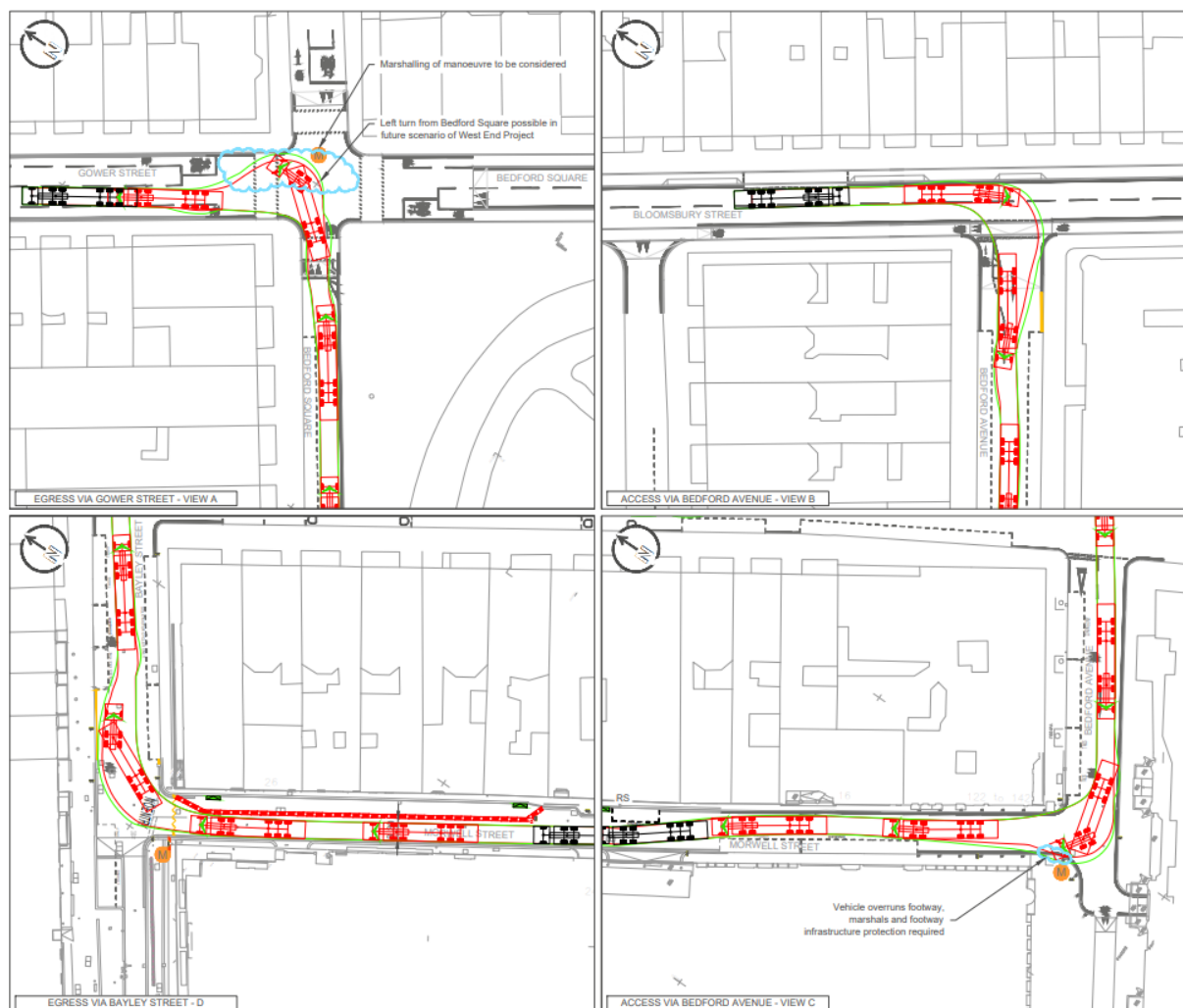
b. Cumulative affects of construction traffic servicing multiple sites should be minimised where possible. Please provide details of other developments in the local area or on the route that

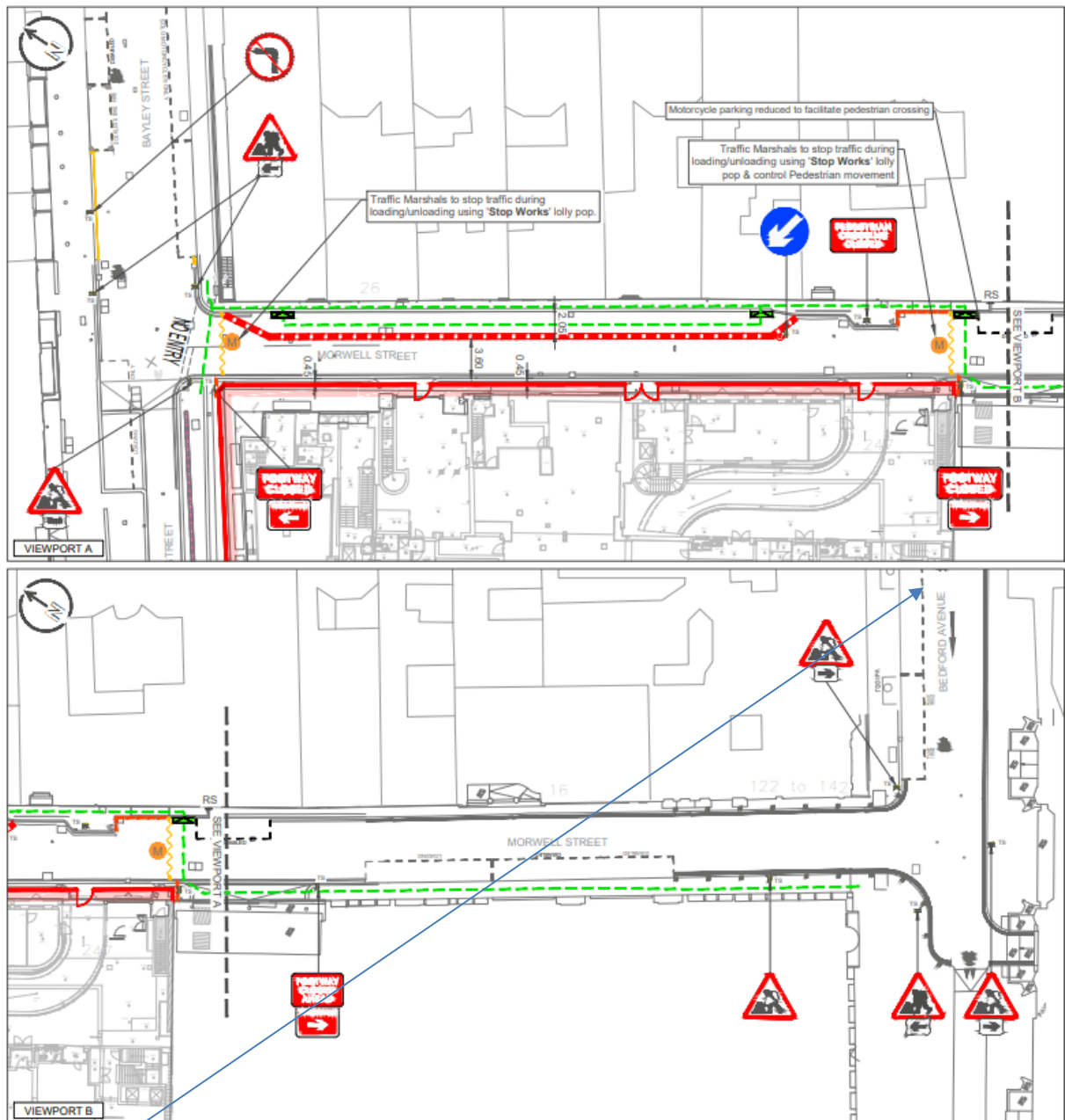
might require deliveries coordination between two or more sites. This is particularly relevant for sites in very constrained locations.

No other developments are known to Kier in the local vicinity at time of writing this report. If Camden are aware of other developments Kier are prepared and happy to work with these sites to minimise cumulative impact on the surrounding area.

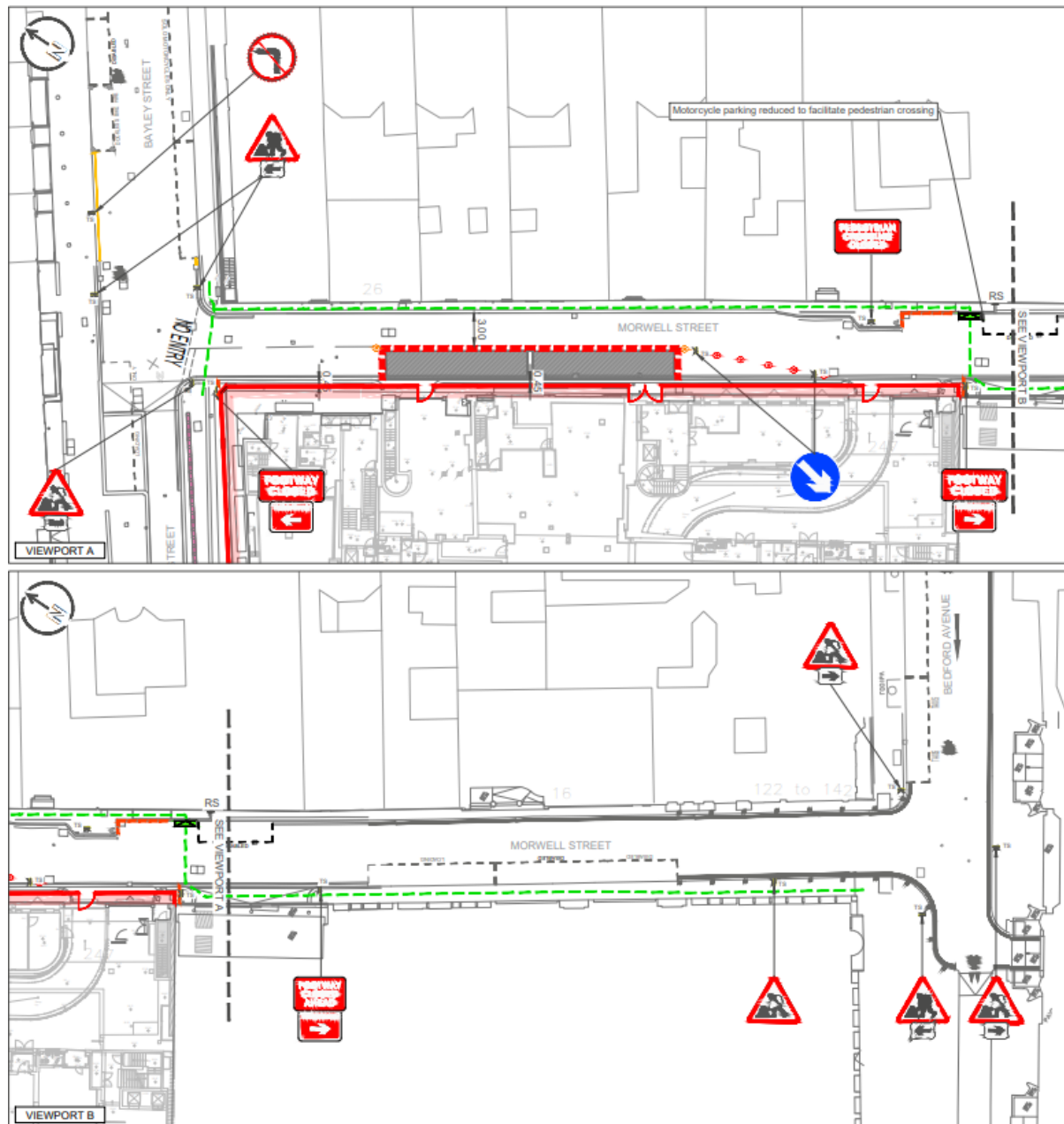
c. Please provide swept path analyses for constrained manoeuvres along the proposed route.

A number of SWA drawings have been completed for the scheme and these shown below.





Road ahead closed sign and 2 way traffic sign junction of Adeline Place and Bedford Ave.
2 way traffic sign same position permitting 2 way traffic South end of Morwell St and West end of Bedford Ave.



Night time operation of Morwell St showing the required 3m clear carriageway and trailer fenced off out of hours.

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 to 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.

Parking bay suspensions will be required to Morwell St but these will fall within the parameters of the TTMO. Further reallocation of parking bays is awaiting London Borough of Camden final advice. Below is a list of these items to be finally resolved with Camden / Kier& Momentum comments.

2 x paid for bays on Bedford Av. Between Morwell St and Adeline Pl removed to create loading area for hotel and 1BA service vehicles

2 x taxi bays on Bedford Av relocated to permit holder bays on Adeline Place to immediate north of junction with Bedford Av. to create loading area for hotel and 1BA service vehicles I'm not sure where this can be accommodated on Adeline Place – in our plan (attached) for Adeline Place, we show a number of changes to parking there to accommodate a coach bay, which we've discussed with Max quite a few times already.

2 x permit holder bays lost to the above taxi bays relocated to the eastern kerb on the western side of Bedford Sq. this can be done – see parking area D in DR-009-B

2 x car club bays on Bayley St to replace two paid for bays on Morwell St is this compatible with the Morwell St closure proposals – could you mark up where these are to be relocated in Morwell St please.

Full time wait and load restriction introduced between dock less bike bay and loading bay on Morwell St We're not aware of a dockless bike bay on Morwell St, but we can add in wait and load restrictions, could you mark on the attached where this is please.

Motorcycle bay on Bayley St extended by 4.4m into existing 10m permit holder bay that is to be replaced by 1 x 6.6m disabled bay this can be done

2 x permit holder bays on Bayley St either lost or relocated to eastern kerb line on west side of BS to allow relocation of disabled bay from Morwell St alternatively relocated to Bedford Square?

1 x m/c bay on Bedford Av relocated one bay to the west to replace 1 x resident permit holder bay this can be done

Full time wait and load restriction introduced between m/c bay and junction with Bloomsbury St this can be done

1 x permit holder bay to replace bay lost to above m/c bay relocated to eastern kerb on the western side of Bedford Sq. this can be done

2 x resident permit holder bays on Adeline Place retained and relocated further to the south adjacent to new cycle hangar don't think there is going to be enough space for this if we retain coach operation from Adeline Place, as in TR-010-C, could you please review in line with the attached and advise.

3 x resident permit holder bays lost on AP relocated to Morwell St in place of the loading bay - vehicles servicing 1BA would have to use the northern kerb line on Bedford Av as mentioned above

2 x diplomatic bays relocate to Gt Russell St (as per permanent proposals for Adeline Place scheme) to those bays nearest to junction with Adeline Pl these are already shown in TR-010-C which has been issued to Camden

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.

A holding area in Purfleet is planned for the façade panels being made in continental Europe.

The superstructure will be having vehicles loaded at the sub-contractors premises to ensure only material required for each day is delivered to site. This means the sub-contractor premises becomes the holding area as steel work will be from Finland delivered straight to their yard, pre cast concrete planks from Ireland will be delivered straight to their yard, pre cast concrete column and wall panels manufactured in UK delivered straight to their yard.

In addition to this Kier intend to place orders for items such as plasterboard and insulation with suppliers depots within LBC as part of our commitment to spending with SME's within the London Borough of Camden. These depots will then become local holding areas for material delivery to site.

The site is not located geographically to make use of water or rail infrastructure.

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).

In line with good practice and Camden requirements plant on site will be Euro VI compliant.

In addition to this the temporary electric supply agreed and planned with UKPN is of a size to avoid the requirement for generators on site to power the cranes.

Wherever possible plant will be electric or hybrid as example all MEWPs on site for the sub and superstructure will be hybrid to avoid engines idling on site and the noise associated as electric will be used generally and charged over night from temporary electric supply.

We are also looking to use electric delivery vehicles with our supply chain such as the below.



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.

To Morwell St the site will have an unloading Zone almost the full length of the building permitting 2 articulated lorries to be unloaded at the same time. The section of Morwell St the length of the site will have a TTMO in place organized through demolition phase of works and then extended during the construction phase for day time hours only. To permit this 2 concertina barriers will be put in place each morning at 07:45 (no noise associated) and a traffic marshal will be positioned at each end of the road closure controlling the concertina barriers to allow construction vehicles in and out of the unloading zone. Red and white barriers will be used with small ramps at the kerbs to extend the footpath to the East side of Morwell St allowing better access for school children who use this route and access to the AA building.

In the event 1 or 2 trailers need to be left over night they will be fenced around over night with orange beacons attached to the fence. Each evening the concertina barriers will be removed as soon as the last vehicle leaves the unloading zone and the footpath extension to barriers and ramps to east side of Morwell St brought inside. The road will be left clear for normal traffic outside of site hours.



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.

In line with the already agreed DMP between Deconstruct UK and London Borough of Camden Kier will look to continue with the current plans as set out below with minor amendments. The entrances to site on this elevation will be 2No pedestrian rather than 2no vehicle. There will be 1no removable hoarding section infilled with Heras fencing and fire retardant Kier branded Monaflex sheeting to allow delivery vehicles to unload items such as blocks straight onto a loading ramp for wheeling direct into the building. An access hatch for access to a fire hydrant with sign will be installed.

N/A no vehicles will be accessing directly into the site.

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.

Kier will not have any vehicles entering site and minimal excavation works. Kier will jet wash the surfaces around the site at the end of each shift as required.

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.

There will be 2 cranes on the scheme, however TC 2 will only be required for the frame construction and PCC façade panel install. TC 1 will be erected as quickly after bulk level dig as possible the intention is in week 2 of the build programme.



Unloading of delivery vehicles by crane will all be from the Morwell St unloading zone. These lifts will be controlled by a site lift supervisor.

In addition to the tower cranes there will be requirement for mobile crane visits for the following operations.

- Erection TC 1- 2 days
- Dismantle TC 1- 2 days
- Infill of Precast concrete planks and topping slabs to TC 1 – 5 days

The same layout as used by Deconstruct UK for mobile crane and articulated lorries for the demolition plant onto roof of existing building will be used with a slightly bigger mobile crane. Photo of previous lift below.



Access to this point will be from Gower St, then reverse into Bayley St. This then allows the vehicles to drive out.

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.

Please refer to drawings included in Q20.b

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.

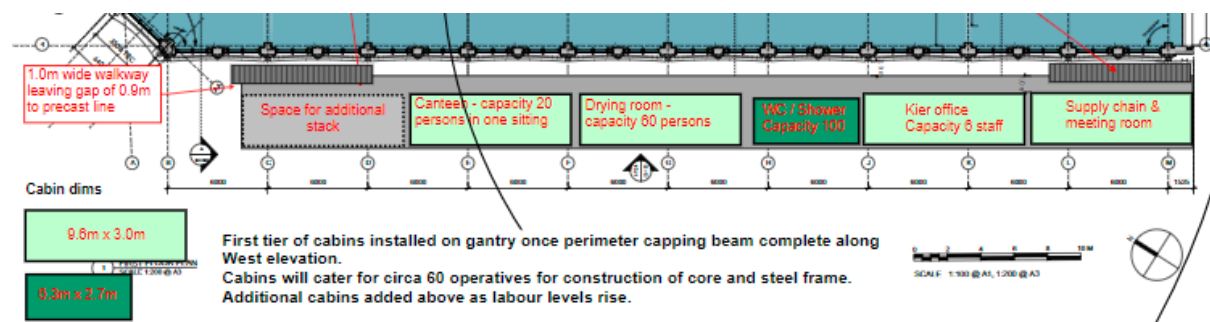
Please note that there is a two week period required for the statutory consultation process to take place as part of a TTO.

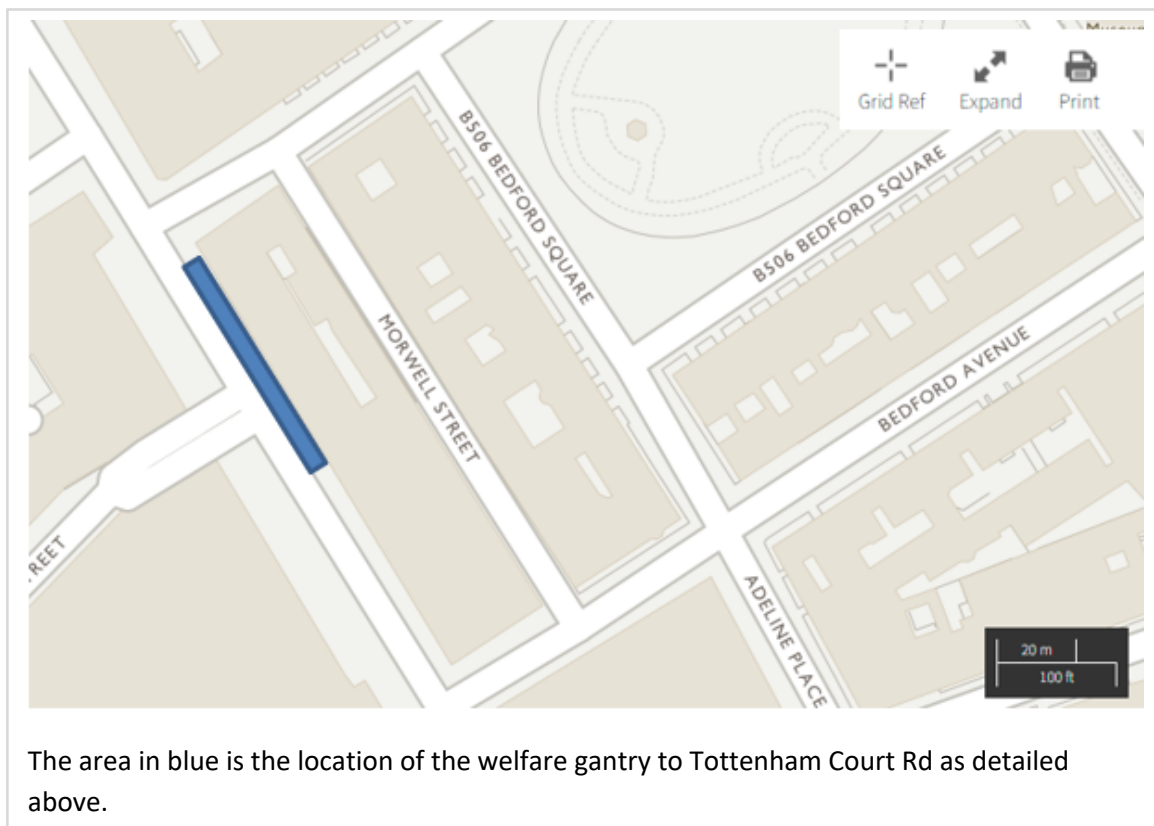
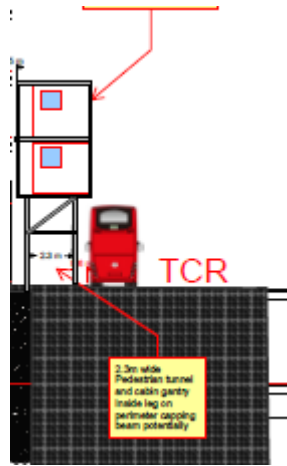
If the site is on or adjacent to the TLRN, please provide details of preliminary discussions with Transport for London in the relevant sections below.

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 Programme for setting the gantry up is as follows.

- 3 day partial closure of footpath to form footings for gantry (450mm in from outer face of kerb)
- 7 day curing time for concrete with chapter 8 barriers left in place around footings.
- 1 lane carriageway closure of Tottenham Court road and full footpath closure with temporary crossings in place diverting pedestrians to other side of the footpath. 1 week this allows 4 days for steel gantry and 2 days to install cabins using a Hi-ab type vehicle including Saturday.
- 1 additional week footpath closure only for scaffold walkway erection
- 5 day footpath closure for hoarding erection, then painted whilst footpath open with chapter 8 barriers protecting public.

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](#).

24. Occupation of the public highway

To facilitate the site's logistics a day time TTO inclusive of Parking suspensions on the West side and removal of the Motorbike parking to the South. TTO is our preference so that we are able to control the Health and Safety of both the public and our construction Staff. To facilitate this we will also request the one way section at the end of Bedford Street is suspended to let taxis back out. (they currently do this anyway even though it is currently an illegal manoeuvre) we will also facilitate safe but controlled passage of North bound vehicles up Morwell Street when safe to do so. Appended to this submission is a drawing detailing parking bay suspensions and alterations to highway markings. Below is the table of parking bay changes.

Overnight vehicles will at times need to be parked in the unloading area in Morwell St and Heras fencing placed around and fixed to the hoarding. Flashing beacons will be fixed to the corners of the Heras in the carriageway.

Parking Bays	Gains		Losses	
	Pay and Display	Resident Permit	Pay and Display	Resident Permit
Great Russell Street			-12.35	
Adeline Place				-21.55
Bedford Avenue			-9.75	
Morwell Street		6.6	-46.7	
Bedford Square				
Bayley Street				-10.7
Total	0	6.6	-68.8	-32.25

Motorcycle Bays	Gains	Losses
Bedford Avenue		-5.6
Morwell Street		-11.9
Bedford Square	17.5	
Bayley Street	3.95	
Total	21.45	-17.5

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.

Footpath closed by southside of Morwell St. Pedestrians will be diverted to the pavement on the other side of the road. Please see TMP drawing above.

It will also be necessary to install a gantry on Tottenham Court Road for welfare and office accommodation as detailed above.

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.

To Morwell St elevation a lamp column will be removed through the course of the work. In the permanent condition 2 new building mounted lights will be installed with a control box within the ground floor façade to the cycle entrance. During building works a pole mounted LED lamp with a p.i.r sensor will be installed as part of the temporary electrics to ensure public safety maintained at all times.

To Tottenham Court Road elevation the gantry and cabin install will be built around a newly installed lamp column and over a road sign. During the extent of the gantry use a temporary LED with a p.i.r sensor will be fixed to the carriageway side of the cabins to ensure any light lost by blocking the lamp column will be replaced and bettered. The road sign will be transferred to the protection of the gantry, then reinstated to the existing post following removal of the gantry.

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.

Part closure of Morwell Street during working hours, pavement to remain open on the opposite side of the road. Ramps will be installed at the southern end of our road closure and the disabled parking bay will be relocated to this end of the street. This will assist disabled access and egress of neighboring buildings such as the Architect Association, etc. Neighbours that require access through to Morwell Street for deliveries etc.... will be granted access by our traffic marshals.

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 West side of Morwell street will be closed for the duration of the project, pedestrians will be diverted on to the other side as marked.

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.

Included in section above.

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

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.

For more information see the Noise Modelling Report (NMR) for this project (*Reference: EEMC_206_001_NMR Rev 00 – 247 Tottenham Court Road*)

Noisy works initially will be shielded from the surrounding area within the basement excavation the only noise will be from grinder's trimming reinforcement bars – this will be kept to a minimum by overlapping bars where necessary and carpenters using skill saws to cut timber.

Once at ground level and temporary propping is removed there will be some minor demolition work using a remote Brokk type machine to remove temporary corbels left by Deconstruct UK through their phase of works. We will install Hears panels with acoustic sheeting around this work to encapsulate the noise as much as possible. If this work is found to be outside the permitted levels with encapsulation method in place we will implement the 2 hours on 2 hours off method agreed in the DMP.



The superstructure has been designed to have minimal noise the columns are precast concrete omitting noise of steel-on-steel connections, only the perimeter beams and a small number of internal beams are steel. All internal walls are precast concrete with a small amount of on site cutting of reinforcement, all planks are precast concrete and the reinforcement to topping slabs will generally be cut with bolt croppers to omit this noise.

The façade is premanufactured off site. The only on-site install is ground floor glazing so extremely little noise associated with façade install.

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.

Baseline monitoring already in place and installed by SES.

There are currently 3 monitoring points for dust, noise and vibration, two located on the roof and one in the courtyard in Morwell Street – these will need to be moved as the building is demolished until in permanent place for construction activities.

Noise impact assessment undertaken as part of planning activities in July 2020. Please refer to appendix.

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

Noise modelling and noise predictions for the nearest most sensitive receptors are presented in our Noise Modelling Report Appendix (Ref: EEMC_206_001_NMR Rev 00 – 247 Tottenham Court Road)

Vibration magnitudes are difficult to predict with any accuracy in a complicated transmission route. A vibration survey before demolition work starts and vibration monitoring during the works will be undertaken as required with set trigger and action levels and handed to Kier for inclusion within this DMP. The works associated with Kier are not currently foreseen to have an impact regards vibration to surrounding properties.

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.

Majority of building premanufactured off site.

Noisy works to be screened using Heras and acoustic sheets.

Minimised use of grinders cutting reinforcement, internally Armourguard acoustically protected cutting stations to be used.

Early install of façade to encapsulate noise associated with fit out works.

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

SES will be maintained for the monitoring of the site and evidence attached of their training in the appendix.

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.

Building will be predominantly manufactured off site.

Water suppression will be used on any concrete cutting.

M rated hoovers will be used rather than brooms

Material will be pre cut / manufactured to correct length to minimise on site cutting.

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.

Very little detritus material on the highway is envisaged through Kier phase of work, however, Kier will have dedicated traffic marshals and gatemen who will have a jet wash for cleaning the road whenever required.

The area around the cycle stand will be included in this also to keep the area clean and clear.

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

The site will be monitored for dust (PM₁₀), noise and vibration. It is anticipated this will require the following monitoring locations:

Four (4) No. dust (PM₁₀) MCerts certified monitors, set with:

- 150µg/m³ (15 minute average) Trigger Level; and
- 250µg/m³ (15 minute average) and 190µg/m³ (1 hour average) Action levels.

See the AQDMP for more information.

A minimum of:

- Two (2) No. Class 1 Noise monitors configured to send email noise alerts in the event of exceedance events;
- Two (2) Din 45669 compliant Vibration monitors will be configured to send email alerts in the event of exceedance events.

See the Noise, Dust and Vibration Management Plan (NDVMP) for more information
(Reference EEMC-NDVMP001-188 Rev02 – 247 Tottenham Court Road)

Noise modelling for the project can be seen in the Noise Modelling Report

Noise and Vibration proposed Trigger and Action Levels are outlined in the NDVMP.

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.**

The dust risk assessment was completed and agreed in the previously submitted DMP, the monitoring agreed in the DMP will be taken forward during the construction phase covered by this CMP

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.)

Kier will employ the relevant highly recommended mitigation measures for this site as listed in Appendix 7 of the SPG. In line with the risk assessment specific mitigation for each phase will also be adopted.

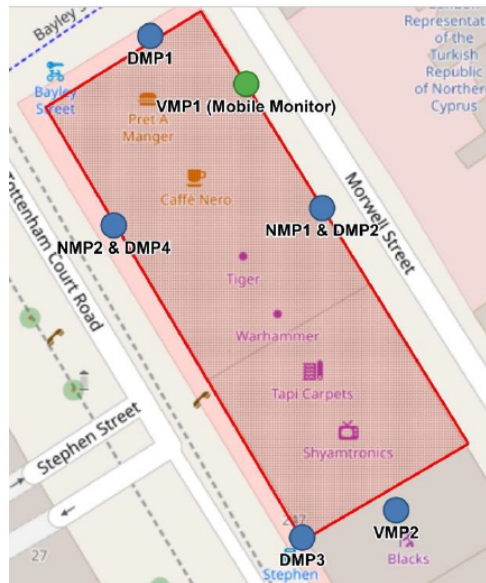
38. Please confirm the number of real-time dust monitors to be used on-site.

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.



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).

During the works Kier will employ an experienced company such as Rentokill for monthly visits to check and bait traps. If a vermin problem is identified then additional visits and measures will be implemented.

No eating is permitted on site only in dedicated welfare areas.

All pest control will be carried out in accordance with section 7.3 of "Guide for Contractors Working in Camden".

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

N/A

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.

These items are all included in the Kier induction which every operative, supervisor and manager on the site will receive.

- Congregation outside of the project perimeter
- Arrival and departure from the project
- Allocated smoking areas
- Requirements for removing PPE before leaving the project
- Interaction with the public
- Respect of the community
- Supporting local establishments
- Effective communication

Kier implement a just and fair culture so try to avoid banning people from site, first a warning will be issued, then on second offence we will reinduct the person a third offence will see the person removed from site.

A smoking area will be identified within the hoarding at ground floor level under the gantry arrangement.

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 (V4): <https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/nrmm>

Direct link to NRMM Practical Guide (V4):

https://www.london.gov.uk/sites/default/files/nrmm_practical_guide_v4_sept20.pdf

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): Jan 2023 to September 2024
- b) Is the development within the CAZ? (Y/N): Yes
- c) Will the NRMM with net power between 37kW and 560kW meet the standards outlined above? (Y/N): Yes minimal for 6 weeks at start and 6 weeks at end of project.
- d) Please confirm that all relevant machinery will be registered on the NRMM Register, including the site name under which it has been registered: Yes (prior to start on site the scheme 247 Tottenham Court Road will be registered on the NRMM register).
- 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.

All material suppliers and sub-contractors will be encouraged to sign up to the Engines off Pledge.

Traffic marshals will be instructed to ensure all delivery drivers turn off engines whilst being unloaded,

Community Liaison Feedback:

44. Below, we have included the comments submitted by local residents to the Construction Management Plan public consultation. Screenshots of the materials shared to promote the consultation have also been included.

Newsletter distribution area: 2,336 addresses



MAY 2022

THE FITZROVIA

COMMUNITY NEWSLETTER

CO-RE

 **M&G**
Real Estate



View from Tottenham Court Road

PROJECT UPDATE

Welcome to our regular series of community newsletters on CO-RE and M&G Real Estate's plans to create new homes and workspaces at 247 Tottenham Court Road / 3 Bayley Street / 1 – 4 Morwell Street.

In this newsletter you will find:

- A reminder of our plans
- Information on the Construction Management Plan public consultation
- Our outline construction programme

Please visit our project website for further information: 247tottenhamcourtrroad.co.uk

OUR PLANS

We are delivering a new, state of the art, five storey building comprised of:



5,570sqm of office space
on the upper levels



A mix of retail spaces on
the ground and lower floors



Eight new homes accessible
from Morwell Street



A new pocket park for the
whole community to enjoy

CONSTRUCTION PROGRAMME

**Summer 2021 –
Summer 2022**

Enabling and
Demolition Works



**Summer /
Autumn 2022 –
Autumn 2024**

Main Construction
Works



Winter 2024

Expected project
completion

CONSTRUCTION MANAGEMENT PLAN

With demolition works due to be completed shortly, we have prepared our Construction Management Plan (CMP), to progress to the next stage of operations.

The CMP will outline how we manage construction works to the highest safety standards, minimising disruptions to neighbours.

A public consultation on the CMP was opened on 24 May and will close 7 June. In this time, we encourage you to submit any comments you have on the plan.

Following this, the CMP will be submitted to the London Borough of Camden. Any feedback we receive as part of the consultation process will be incorporated into the CMP (anonymously) ahead of submission.

We hope the plan will be approved this summer, with construction works beginning later in the year.

You can download a copy of the CMP from our project website: 247tottenhamcourtroad.co.uk

HOW TO COMMENT

To share your views on the CMP, please get in touch by:



0800 307 7548



247TottenhamCourtRoad@londoncommunications.co.uk



247TottenhamCourtRoad.co.uk

Please send your comments by Tuesday 7 June 2022. We will then consider all feedback received, before sharing the CMP and your comments (anonymously) with the London Borough of Camden, for their consideration.

Stakeholder letter and follow-up emails to CWG members

Dear CWG member,

Thank you for your continued interest and participation in the Construction Working Group for the redevelopment of 247 Tottenham Court Road.

As you will be aware, we have shared a draft copy of the Construction Management Plan with members, as we prepare for the next phase of works on site.

The Plan, which will outline how we intend to carry out construction works to the highest safety standards, will undergo a 14-day public consultation, from **Tuesday 24 May**.

If you would like to comment on the Plan, please do so by:

Email: 247TottenhamCourtRoad@londoncommunications.co.uk

Freephone: 0800 307 7548.

Website: Filling out the '[contact us](#)' feedback form

A newsletter (attached) has been distributed to over **2,000 households** in the local area informing them of the consultation and the different ways in which they can submit comments. We would be most grateful if you would share this through your local channels as well, to ensure as many people as possible are able to provide feedback.

Please send your comments by Tuesday 7 June 2022. We will then consider any feedback, after which a CWG meeting will be arranged later in the month, to inform you of our intention to share the draft CMP with LB Camden for their consideration.

Should you have any questions about the consultation or construction programme generally, please get in touch with a member of the team using the contact details above. Alternatively, for enquiries about site specific operations, please contact Deconstruct's Project Manager Pat Pearson (who is on site daily) by:

Email: Pat.Pearson@deconstructuk.com

Phone: 07900 788087

Kind Regards,

David Hutton
(CO-RE, Director)

Dear CWG Member,

I hope this email finds you well.

Thank you for your continued interest and membership of the Construction Working Group for the redevelopment of 247 Tottenham Court Road.

As mentioned at last week's meeting, we will be launching a 14-day consultation on the Construction Management Plan on **Tuesday 24 May**, closing **7 June**.

I have attached a newsletter, which is being sent to over 2,000 households, and a letter which has further information on the consultation and next steps for the CMP.

Following the consultation, we will reflect on local feedback and submit the CMP (with your comment anonymised) to the LB Camden for their consideration.

You can submit comments on CMP by:

- **Email:** 247tottenhamcourtroad@londoncommunications.co.uk
- **Freephone:** 0800 307 7548
- **Website:** Filling out our 'contact us' feedback [form](#)

Tomorrow, our project website will be updated where you will be able to see and download the CMP.

Kind Regards,

Jack

247 TCR Project Team

Dear CWG Member,

We would like to remind you that the consultation on the CMP for 247 Tottenham Court Road will be closing on Tuesday **7 June**.

You can submit comments on CMP by:

- **Email:** 247tottenhamcourtroad@londoncommunications.co.uk
- **Freephone:** 0800 307 7548
- **Website:** Filling out our 'contact us' feedback [form](#)

Have a great Bank Holiday weekend.

Kind Regards,

Jack

247 TCR Project Team

Screenshot of project website promoting CMP consultation

0800 307 7548 247TottenhamCourtRoad@londoncommunications.co.uk




CO-RE M&G
Real Estate


Welcome to the project website for CO-RE and M&G Real Estate's mixed-use plans to develop new homes, offices and retail spaces at 247 Tottenham Court Road.

Click [here](#) to see our draft Construction Management Plan; the approved Demolition Management Plan can also be viewed [here](#)

M&G Real Estate, the owners of the site and development managers CO-RE, are pleased to bring forward this exciting development in the heart of the West End.

On this website you will find:

-  Information about our scheme
-  Our construction programme and upcoming works
-  How we will keep you informed and ways of getting in touch with the project team



CGI of proposed exterior design of the building

CONSTRUCTION MANAGEMENT PLAN

As the project team are due to complete the demolition phase of works shortly, we have prepared our Construction Management Plan (CMP) to progress to the next stage of operations.

The CMP outlines how we intend to manage construction works to the highest safety standards and minimise disruptions to our neighbours.

On Tuesday 24 May, a public consultation was opened on the CMP, where members of the public are able to submit any comments, they have on the document. Although the consultation is due to close on 7 June, we will continue to welcome any feedback you have.

See the 'contact us' section for further details on how to provide comments on the CMP.

Following the end of the consultation period on 7 June, the CMP will be submitted to the London Borough of Camden for consideration. Any feedback we received as part of the consultation process will be incorporated into the CMP anonymously ahead of submission. We hope the plan will be approved in the summer, with construction works beginning later this year.

You can download a copy of the CMP by clicking [here](#).

You can download a copy of the Air Quality Monitoring Report [here](#).

THE SCHEME

The current site, which incorporates five buildings – 247 Tottenham Court Road / 3 Bayley Street / 1 – 4 Morwell Street, is almost sixty years old and is no longer considered fit for modern working requirements.

In January 2021, Camden's Planning Committee granted planning permission for the construction of a new state of the art five storey building, comprised of:



5,570sqm of office space on the upper floors



A mix of retail spaces on the ground and lower floors



Eight new homes accessed via Morwell Street



A pocket park for the whole community to enjoy

TIMELINE



FAQS

1. When will construction works begin on the new development?



2. What is the difference between the Demolition and Construction Management Plans?



3. Have you now completed all demolition works on site?



4. Who can I contact to speak about the project?



5. What impact has Covid-19 had on the construction programme?



6. How are you communicating the construction plans with local residents?



CONTACT US

We welcome any questions or comments you have about the Construction Management Plan and programme more generally. Please fill out the feedback box, or get in touch with a member of the team by:



Phone: 0800 307 7548



Email: 247tottenhamcourtroad@londoncommunications.co.uk

Kier's Senior Project Manager Steve Walford and Deconstruct's Project Manager Pat Pearson, are both on site regularly and happy to provide any assistance as required. They can be contacted via:

Pat Pearson:



Phone: 07900 788 087



Email: Pat.pearson@deconstructuk.com

Steve Walford:



Phone: 07790 941 817



Email: Steve.walford@kier.co.uk

Please leave your feedback here

☐ I agree to be contacted about the proposals for 247 Tottenham Court Road. We will keep your information on file until the development is complete. We will not pass your details to any third party and you can be removed from the mailing email 247TottenhamCourtRoad@londoncommunications.co.uk

SUBMIT FEEDBACK



Consultation responses (Responses are anonymous, unless requested otherwise and are posted in order of when they were received)

1. Name, redacted

Our association is very concerned about the construction of 247 TCR. This is a Tottenham Court Road development and we are told it will benefit the shopping street and office offering. Yet all the construction traffic is being directed through the side streets past people's homes and listed buildings.

We are also concerned about the tight turns construction vehicles will have to make - including articulated lorries. This will affect the safety and comfort of pedestrians and cyclists around the site as well as being a noise nuisance to local residents.

As such we strongly object to the CMP in its current form.

Regards,

Charlotte Street Association

2. Name, redacted

Please find below some points that we would like noted in response to the 247TCR CMP consultation.

We still don't understand the logic behind the proposed traffic route. As outlined by us and many others during the consultation stages of the demolition plan, taking into consideration the historical importance of Bedford Square and the nature of the surrounding streets, the most obvious traffic route would be via Tottenham Court Road rather than Bedford Sq. That appears to be the route favoured by all parties involved except Camden Council. It is therefore frustrating to see the controversial route proposed here once more, now for the duration of the construction.

The Bloomsbury Association has made a strong case against the route, and we would like to note that we support their proposals for an alternative routing via Tottenham Court Road, and we urge Camden Council to reconsider.

With regards to the proposal to close Morwell Street to traffic during construction hours, we would like confirmation included in the CMP of the following points agreed at various times with the Construction Working Group and Camden Council, to ensure that our day to day work can continue as normal:

1. That pedestrian access will be unaffected throughout the construction. Morwell Street is an essential route in constant use by our staff and students to access buildings and workshops and to move from one building to another, it is a fire escape route and it provides the only step-free access to our buildings for disabled users and visitors.
2. That deliveries will continue to be allowed to our workshops and buildings on Morwell Street. Kier have confirmed verbally that this will be possible, and easy to arrange with their staff on duty at the barriers, but we would like to see this also in writing in the CMP.
3. That we will be able to continue to place a skip on Morwell Street at key times of the year, and continue to park a removal vehicle occasionally as and when needed. We use on average 25 full-size skips annually – the majority of these between June and August each year, but often needed at other times of the year too. It is crucial for us to ensure this continues to be available on Morwell Street, next to the area where the pavement projects onto the street (back door of 34 Bedford Sq). We also use removal vehicles occasionally at that point, in average twice per year.
4. That refuse and recycling collection on Morwell St will remain unaffected.

3. Name, redacted

The Bloomsbury Residents Action Group (BRAG) objects to the draft CMP for the redevelopment of 247 Tottenham Court Road. This is principally due to the decision to route construction traffic through streets where there are important heritage assets, and where people live, purely to avoid any use of Tottenham Court Road.

Why should Tottenham Court Road be exempt?

Weighing the pros and cons, Tottenham Court Road is obviously the best road to use for construction traffic - and we have been advised that it was the contractor's initial choice. The road is sufficiently wide, there are fewer heritage assets, and fewer permanent residents. People accessing shopping / business / commercial streets in central London are used to construction traffic, eg High Holborn, New Oxford Street, Oxford Street. Why should Tottenham Court Road be exempt?

The redevelopment of 247 is intended, we assume, to benefit the street. Why should the street not share in the discomfort of construction?

Why give planning permission for this particular development when the actual construction of the building would prove to be so problematic?

The West End Project scheme was approved in 2014, the work started in 2018 and yet three years later, in January 2021, the Planning Committee approved the 247 TCR scheme.

Was the impact on heritage assets even mentioned at the time? Possibly not, because it may have been assumed that construction traffic would not be going anywhere near the Grade I listed buildings. At least one member of the Planning Committee, Councillor Harrison, knew the details of the West End Project, and had been in support of the project from the start. Why was there no debate THEN about how the 247 TCR project would be constructed, and where the HGVs would go?

The need for compromise

The report for the West End Project that was presented to Cabinet in January 2014 stated the following, at 1.4 *"While the overall benefits delivered by the project are significant, it is inevitable in the sharing of the limited street space between uses that there will need to be compromises."*

There seems to be no attempt at compromise regarding the routing of heavy construction vehicles accessing 247 Tottenham Court Road. The review of routes in the draft CMP states clearly that in Camden's opinion, using Tottenham Court Road is not viable. Why? The answer given is because it compromises West End Project Traffic restrictions and public realm enhancements.

The CMP states that the majority of the building will be pre-manufactured off site. It has to get to the site - meaning that transportation will be a major part of the construction.

So where is the compromise?

Negative impact on heritage and residential amenity

Camden's refusal to contemplate use of Tottenham Court Road will have potentially serious implications. The site lies within the Bloomsbury Conservation Area. The sensitive, unique, Grade I listed buildings in Bedford Square will inevitably suffer from the impact of so many HGV movements accessing the north of the square.

Residents who live in the streets chosen for the routes will suffer from noise, pollution and inconvenience. Even on a Saturday morning. There are at least 150 homes on Bedford Avenue, Adeline Place, Morwell Street and in Bedford Square. People live here - their quality of life matters too. There's a school in Bedford Square, there are businesses in the affected streets, cyclists criss-cross the neighbourhood. No single street is actually more important than another if you cycle regularly around the area.

Precedent v. merit

In the same way we are always assured by planners that the proposed height of one development does not mean this sets a precedent for a tall building somewhere else, so giving permission for construction traffic to access Tottenham Court Road for 247 does not mean that this will set a precedent for further dispensations. This appears to be one of the arguments, and if so, it is inconsistent with Camden's approach to planning matters. We are told that decisions have to be made on the merits of each individual case.

The need to protect and preserve Bedford Square makes this a special case.

We understand the benefits of the West End Project, but suggest there could be a compromise whereby SOME of the construction traffic could be permitted to use Tottenham Court Road, at certain times, with the assistance of traffic marshals to protect the safety of cyclists and pedestrians.

We fully support and endorse the detailed analysis provided by Stephen Heath of the Bloomsbury Association.

4. Name, redacted

Comments on the 247 TCR Construction Management Plan from Bedford Court Mansions Ltd

Bedford Court Mansions is a large residential block comprising 114 homes on the south side of Bedford Avenue. Bedford Court Mansions Limited are making this written submission on behalf of the residents. With respect to the current Construction Management Plan for 247 TCR the main aspects we are interested in are:

- A construction traffic plan which minimises noise and physical impact.
- A final built outcome that restricts and limits anti-social behaviour / drug use on Morwell Street.
- Improvement of the overall TCR area environment.

We supported the original draft traffic management plan which minimised disruption to local residents by using TCR for access. Given the large number of homes on Bedford Avenue plus the sensitive, historic character of Bedford Square which also includes a school we strongly supported this approach to minimise disruption in these streets adjacent to the site.

We were disappointed when we were informed in late October 2020 that the traffic plan described above was rejected. We were informed that the West End Project management team would not grant dispensation to use TCR for construction traffic and this was agreed at Cabinet Level. The Bloomsbury Association have highlighted that the current plan prioritises public transport and traffic interests above residential amenity, safety of school children and heritage sensitivities. We support their view and remain opposed to the current traffic plan which will direct construction traffic along the following routes: -

- i i) the new two-way segregated cycle / vehicle scheme on Gower and Bloomsbury Streets
- ii ii) residential Bedford Avenue
- iii iii) Bedford Square, a principal heritage site within the Bloomsbury conservation area.

We note that large trucks associated with the project do sometimes use TCR for specific site operations so access and exit via this route is clearly being granted at the discretion of some overseeing authority.

The cumulative impact of hotel delivery, coach, school and construction traffic on the Bedford Avenue - Adeline Place junction is likely to cause unmanageable congestion. A recent meeting of the Construction Work Group (19/05/22) alerted members to a new proposal to close Morwell Street to non-site traffic as an attempt to control this congestion. However, it is suggested that a Temporary Traffic Order should be considered to ban coaches from Bedford Avenue, Adeline Place and Bedford Square as an alternative way to reduce and manage congestion.

BCML have emailed the 247 TCR project communications team on numerous occasions (most recently on 16/05/22) about a request for a vibration monitor to be installed on Bedford Avenue to monitor the impact of construction traffic on our building. We are yet to receive any response or comment about this request which would provide the impact assessment needed for our Sensitive Receptor location along the currently proposed access route for all construction traffic.

Finally, in the Camden Local Plan issued in 2017, Section 6 emphasises that Protecting Amenity is an important issue. Policy A1 Managing the impact of development, states that *“the Council will seek to protect the quality of life of occupiers and neighbours.”* As the current traffic plan will cause *“unacceptable harm to amenity”* we would again urge the Planning Committee to reconsider the original plan to use TCR and Morwell Street for construction traffic access and exit.

5. Name, redacted

- i A new construction management document is offered for consultation with a new 'owner', Kier. The previous document was for demolition; this is for construction and will have effect for a far longer period of time. It is a time for considered review, not to carry on blindly as before.
- ii The draft Construction Management Plan (CMP) gives priority to construction traffic considerations over other mitigating other impacts provided for in the s106 Agreement, which would be in breach of the legal undertaking entered into between the developer and the Council. This is considered in detail below under the headings of the various impacts.
- iii While construction and demolition management documents may, in principle, be identical, this new plan includes provision for closing Morwell Street to facilitate construction, making Bedford Avenue two-way and displacing service traffic from Morwell Street onto Bedford Avenue, Adeline Place and Bedford Square. This is contrary to the spirit of the s106 Agreement and the objectives of the Council's West End Project and results in a cumulative transport impact that impacts adversely on business and residential occupiers, on school safety, the cycle priority network and heritage sensitivities. It would also conflict with obligations and planning conditions imposed on the development of 1 Bedford Avenue and the St Giles Hotel.

- iv Consideration should be given to a temporary traffic order banning coaches from Bedford Avenue, Adeline Place and Bedford Square. Coaches, buses and associated school traffic, vehicular servicing and refuse collection together with construction traffic create a cumulative impact that is unmanageable. If Camden officers have determined that construction, servicing and school traffic is most important, tourist coaches have to go. Westminster have successfully adopted the same approach in east Marylebone.
- v The swept path analysis included in the CMP confirms that the proposed access route is unsuitable for large articulated vehicles.
- vi The implementation of improvements to the pedestrian environment, a contra-flow cycle lane and cycle docking station proposed on Adeline Place and already funded by the development of the hotel at 112A Great Russell Street, are at risk of being unnecessarily delayed.
- vii Large construction vehicles should not access the site at weekends, to give residents respite.

The Bloomsbury Association opposes the first draft Construction Management Plan, dated 12 May and made available for consultation on 24 May 2022, and would like to see a different approach to construction management in the development of 247 Tottenham Court Road. This is for the following reasons.

Legal agreement

Obligations relating to the Construction Plan set out in the s106 Agreement have not been met. It has not been satisfactorily demonstrated that the construction phase of the development can be carried out safely and with minimal possible impact on and disturbance to the surrounding environment and highway network including:

- to mitigate and offset potential or likely effects and impacts arising;
- to ensure there are no adverse effects on listed buildings and Conservation Area features;
- to ameliorate the health and amenity of local residences, local businesses and educational institutions;
- to ameliorate the health and safety of school pupils, cyclists and adjoining developments undergoing construction.

What is proposed is a solution for the highway network only that results in maximum possible disturbance to the surrounding environment. It proposes south travelling vehicles arrive from Gower Street via Bedford Avenue, a predominantly residential street, and depart using the north side of Bedford Square and then

south again on Bloomsbury Street.

Bedford Square is considered one of London's finest and best-preserved historic squares and is the only intact Georgian square in London. To reflect its importance, all of the Square's 54 buildings are Grade I listed and Historic England defines Grade I buildings as being *"of exceptional interest, sometimes considered to be internationally important"*. These Grade I listed buildings also have frontages to Bedford Avenue and to Morwell Street. 43-45 Bedford Square and 15-19 Bedford Avenue accommodate a primary school.

We are told that during the sub-structure stage there could be 25 trucks a day, 500 trucks per month on this route, six days a week. It ignores impacts in the areas mentioned in the s106 Agreement to do with heritage sensitivities, environment, health and safety, residential and business amenity. There is no perfect solution and all these have to be balanced, across the various disciplines, including highways, and the best compromise sought. However, this has not happened. Council officers have signalled intransigence - that they are not willing to compromise and traffic has become the overriding consideration, contrary to the intent of the s106 Agreement.

The swept path analysis demonstrates that exiting via Bedford Square north onto Gower Street is not possible. The problems with exiting via Bedford Square south towards Bloomsbury Street are to do with the effect of load and vibration on fragile historic structures in Bedford Square, sensitive surface finishes, the structural stability of pavement vaults and turning across cycle lanes and the path of approaching traffic. Add to this considerations to do with damage to the setting of 54 listed buildings, environmental factors, the health and safety of school children and business/educational amenity that the Section 106 Agreement requires to be considered. The wording of this obligation is "proposals to ensure there are no adverse effects on the Conservation Area features". The Georgian Group's objection highlights that the setting of the Square's listed buildings *"...is also influenced by other environmental factors such as noise, dust, smell and vibration..."* to which we would add large numbers of heavy vehicles that are inappropriate in such a sensitive historic setting.

The problems with entering via Bedford Avenue are all exactly the same but affect residential amenity more than business amenity as Bedford Avenue is a predominantly residential street.

Furthermore, we understand that the residents of Bedford Court Mansions on Bedford Avenue and Adeline Place, comprising some 134 homes, have not received any direct mail notification of the consultation. A reasonable period should be allowed for them to respond in order to meet Camden's requirements under in the pro-forma management plan the contractor is obliged to use under the s106 Agreement, as set out below (our emphasis in bold):

*"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."

Impact on residential amenity

No measures are proposed to ameliorate the health and amenity of local residences. Indeed none of the residential building directly affected by the works are identified in the draft Construction Management Plan. These total some 150 homes on Bedford Avenue, Adeline Place, Morwell Street and in Bedford Square.

Working hours do not give adequate respite to residents who are more likely to be at home at weekends. Hours proposed provide for both noisy work to be undertaken and for vehicles to arrive, load and depart - itself a noisy activity - on Saturdays. This contradicts what we were told at a meeting with the development team, their contractor and a Camden officer on 27 July 2021 when it was explained that no noisy activities would be undertaken on Saturdays. This measure was required in the Construction Management Plan for the adjoining 251-258 Tottenham Court Road and 1 Bedford Avenue and should also be adopted here and for the same reasons - to ameliorate the health and amenity of local residents.

Allowing vehicles to access and depart from the site before 08:00 and after 18:00 (section 19, p28) does not comply with what is acceptable to the Council in a standard condition under s20 of the Council's pro forma Construction Management Plan, namely to limit vehicle movements between 09:30 and 16:30 on weekdays. This measure was required in the Demolition Management Plan for 251-258 Tottenham Court Road and 1 Bedford Avenue and should be adopted here too for the same reasons - to ameliorate the health and amenity of local homes, local businesses and school children.

For reference, the Construction Management Plan for One Bedford Avenue, on page 231, gives 'Site working hours'. This states: *"The site working hours are restricted to between 08.00 and*

*18.00 Monday to Friday and 08.00 to 13.00 Saturday. No working outside these hours is permitted or on Sunday's or Bank Holiday's, unless previously agreed with the relevant authorities. Special Deliveries and after hour work will be in conjunction with the Camden Councils permission. **Vehicle arrival and departure times will be limited to between 9:30am and 16:00 Monday to Friday.**"* This was agreed by Camden Council and we are looking for the same to be applied here, without exception.

Impact on heritage

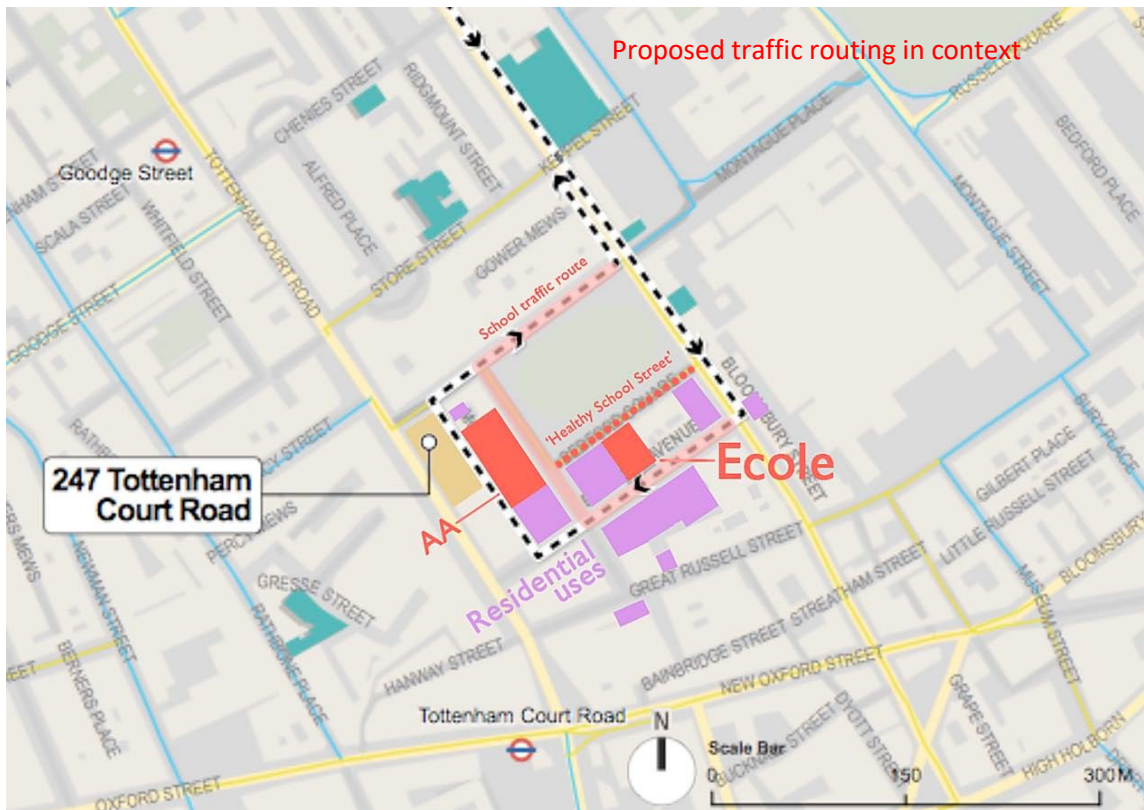
No measures are proposed to ensure there are no adverse effects on the setting of listed buildings and Conservation Area features, particularly the paved pedestrian area of Bedford Square, so attractive to lorry drivers for parking or for driving around a parked vehicle obstructing their path.

No measures are proposed to ensure there are no adverse effects on historic buildings and structures, particularly pavement vaults and retaining walls on Bedford Avenue and in Bedford Square by the frequent passage of heavy vehicles. Section 19 of the draft Construction Management Plan gives a description of the vehicles proposed to be used. These include articulated trucks and 40 cubic yard tippers with a maximum laden weight of 32 tons. An 8-wheel tipper lorry would be 11-13 tons unladen and up to 32 tons laden. By comparison, an AEC Routemaster is 7.5 tons unladen and 12 tons fully laden; the new Routemaster is 12.4 tons unladen and 18 tons laden.

Clearly, damage effect varies and depends on the size and loads carried, the number of axles and frequency of trips. Nevertheless, as has already been pointed out to the development team, 5-6 pavement vaults to listed buildings collapsed on Gower Street in recent years due, it is thought, to heavy bus traffic. There was also heavy cracking/splitting of the carriageway. It maybe a simplification but reasonable to assume that, given the extra axles and tyres on a truck, its laden effect on the road is similar to a double-decker bus. If so we then only need to compare the number of journeys being made.

In the CMP an estimate is given of 25 truck loads a day maximum. We assume that equates to 50 in/out journeys - so less than 10% of all the bus journeys on

Tottenham Court Road in a similar period. In contrast, assume Bedford Square/Avenue normally get 5-10 trucks or coaches per day. In such a case, the influx of heavy vehicles planned by the current proposal is about 5- 10 times greater than the existing baseline and the risk of damage and effect on residential and business amenity increases in the same proportion. Gower Street highway surfaces were strengthened during the West End Project works but Bedford Avenue, Bedford Square and Morwell Street were not.



Impact on schools

Allowing vehicles to access and depart from the site from before 08:00 until after 18:00 on weekdays does not comply with standard conditions under s21 of the Council's pro forma Construction Management Plan and the Guide for Contractors Working in Camden. This states "If there is a school in the vicinity of the site or the proposed access and/or egress routes, then deliveries must be restricted to between 09:30 and 15:00 on weekdays during term time". This condition has been ignored.

No measures are proposed to ameliorate the health and amenity of educational institutions and the safety of schoolchildren attending Ecole Jeannine Manuel in Bedford Square. Allowing vehicles to access and depart

from the site from before 08:00 until after 18:00 on weekdays, without such a restriction, places the safety of school children at risk during the morning drop-off and pick-up times.

It should be noted that a proposal for establishing a *'Healthy School Street'* on the south side of Bedford Square was approved by Camden Council in April and implemented in July 2021. This is not acknowledged in the draft Construction Management Plan nor are any measures proposed to ameliorate the safety of school children using or crossing the parallel, proposed routes for construction traffic. The south side of Bedford Square is now closed to traffic from 08:00 to 09:00 and 15:00 to 16:30 weekdays and all school traffic, including a fleet of 5 school buses, displaced to the same routes proposed for construction traffic - Bedford Avenue and then north side of Bedford Square. Construction vehicles should not be permitted to access and depart from the site at these times for reasons of public safety and to avoid disturbance on the surrounding highway and cycle network.

In addition, inadequate space is allowed for fire escape and for students to safely move between the various buildings occupied by the Architectural Association School of Architecture with entrances on Morwell Street.

Impact on local business

No measures are proposed to ameliorate the amenity and operation of local businesses. In particular, the effect on servicing My Hotel and The Jack Horner on Bayley Street; servicing the St Giles Hotel on Bedford Avenue and on servicing offices at One Bedford Avenue and retail units at 251-258 Tottenham Court Road. One Bedford Avenue and associated retail units are required through planning condition to use Morwell Street. Similarly, the St Giles Hotel is required through planning condition to service within the curtilage of the building using its dedicated delivery area on Bedford Avenue, not on-street. The Architectural Association is also serviced from Morwell Street.

The servicing of the St Giles Hotel and vehicle flows on Bedford Avenue appear to be misunderstood. The Construction Management Plan proposes that Morwell Street is closed to all traffic, other than construction vehicles, during working hours. This would require all the service vehicles, refuse trucks and coaches that serve the St Giles Hotel to somehow park, offload, pick-up and set-down, turn around and return to Adeline Place, counter to the one-way west-bound flow of traffic on Bedford Avenue and while the same route is also being used by construction traffic. This is dangerous if not

impossible. This 720-room hotel generates large volumes of service and coach traffic in normal times and this does not seem possible without impacting on road safety, severely damaging residential amenity in Bedford Court Mansions and presenting safety risks to cyclists using the contra-flow cycle lane. Sometimes up to five coaches full of package tour guests can arrive or depart at the same time. No consideration has been given to how this will work.



This also ignores that Adeline Place is designated for environmental improvement works funded through the s106 agreement for the development of the hotel at 112A Great Russell Street.

These are to be undertaken this year and include a TfL cycle hire docking station to replace those lost through development on Bayley Street and Earnshaw Street. It is to be implemented with additional servicing space for the new hotel together with a contra-flow cycle lane.

Noise assessment.

Measures proposed to ameliorate the health and amenity of local residential, business and educational uses are flawed as they are based on unsound data. The Noise Modelling Report by EEMC is inadequate in that it ignores sensitive residential receptors at 40, 41 and 42 Bedford Square, 9, 11 and 13 Bedford Avenue, 12 and 14 Adeline Place and 41-121 Bedford Court Mansions, Bedford Avenue.

The Noise Assessment by AECOM is woefully out of date and includes historic

noise survey data for the Central YMCA and 112A Great Russell Street that was found to be unsound or fundamentally flawed for the locations and projects referenced. All this data is older than two years and therefore unreliable. It is recognised good practice for noise level surveys to be carried out and reviewed at least every two years, something vitally important at this location since, as a consequence of the West End Project becoming fully operational in early 2021, noise and air quality levels have changed substantially.

Conflict with cycle routes

Both the proposed access route along Bedford Avenue and the proposed egress route along the north side of Bedford Square and Gower Street follow high-risk routes with cycle lanes and contra-flow lanes and place the safety of cyclists at risk. Introducing the new Highway Code, the DfT recently advised the Code's new hierarchy would ensure *"road users who can do the greatest harm"*, such as those in cars, vans and lorries, *"have the greatest responsibility to reduce the danger they may pose to others"*. We would like to see this reflected in construction management.

Measures to ameliorate the health and safety of cyclists are inadequate where the egress from the north side of Bedford Square into Gower Street and access from Gower Street into Bedford Avenue conflicts with cycle lanes. The contra-flow cycle lane on Bedford Avenue was constructed in January 2021 at the same time that Bedford Avenue was resurfaced in its entirety. We are surprised the team is not aware of this.

The preferred solution

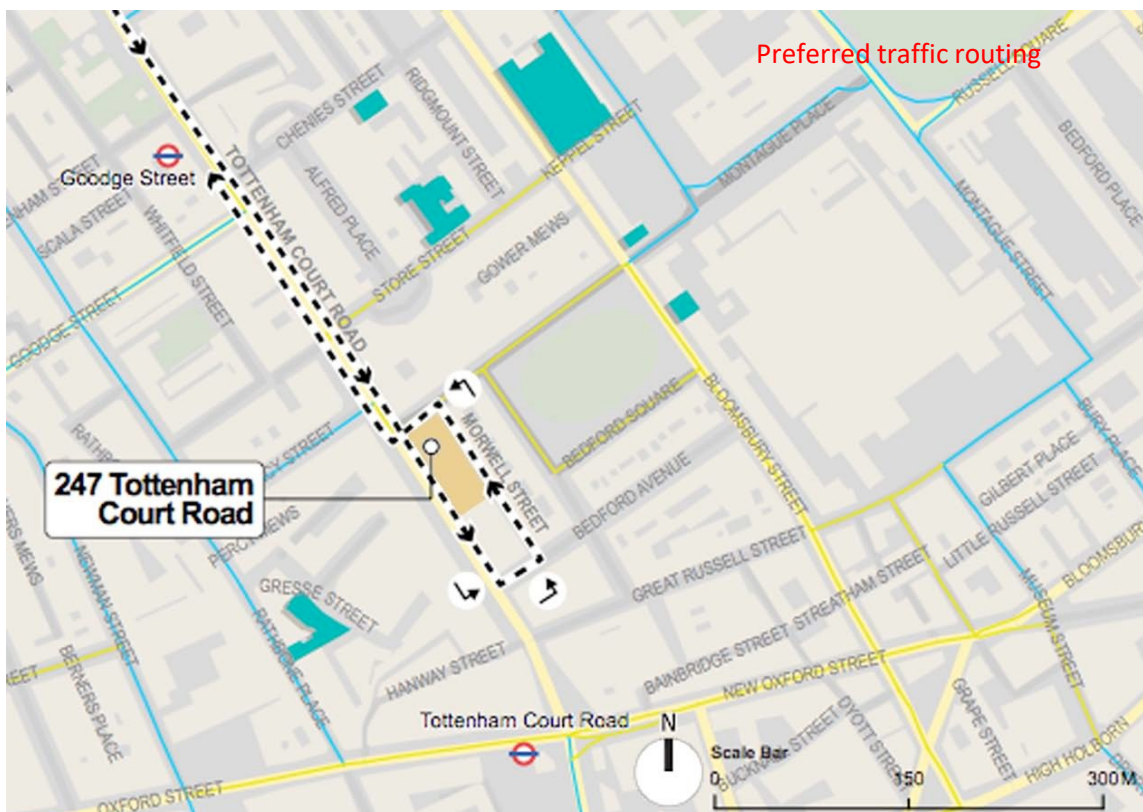
All these issues could be resolved if the heaviest, noisiest and most frequent vehicles used Tottenham Court Road, not Bedford Square and Bedford Avenue, as originally proposed by CoRe's development team and as successfully implemented during the demolition and construction stages of 251-258 Tottenham Court Road and 1 Bedford Avenue. Access to Morwell Street from Tottenham Court Road would be via Bedford Avenue; egress back to Tottenham Court Road would be via Bayley Street.

It has been pointed out that access from Tottenham Court Road via Bedford Avenue and egress via Bayley Street requires use of the cycle cut-throughs when there are suitably sized roads nearby that are already permitted for

general traffic use. This ignores that they could both coexist in the same space, as they already do on Gower Street and on the remainder of Bedford Avenue and Bayley Street in the current proposal. We see no issues with lorries using the cycle cut-throughs from Tottenham Court Road as long as there are traffic marshals.

The 3m cycle cut-throughs at the junctions of Bedford Avenue and Bayley Street with Tottenham Court Road could be easily managed with traffic marshals at times they are required for other purposes. Indeed, they have been designed with that flexibility of use in mind and, prior to a removable bollard being placed in the centre of each lane, were used by general traffic for many months.

Sending large trucks down cycleways is not advisable but that is what is currently proposed. Gower Street is the major cycling route, with dedicated cycle lanes each side. In January 2021, Bedford Avenue was also reconfigured and resurfaced in its entirety with a contra-flow cycle lane running its length. The '*Healthy School Street*' project in Bedford Square was also implemented in July, also with a contra-flow cycle lane to mirror that existing on the north side of the Square. Tottenham Court Road does not have these and is not as heavily used by cycles as Gower Street appears to have become. Indeed, Tottenham Court Road has wider pavements but, in its design, is no more a cycling street than any other.



It has also been pointed out that allowing construction vehicles to use Tottenham Court Road during the controlled hours of the West End Project would be inappropriate and only applicable in extreme situations. That is what this is - an extreme situation that was not anticipated in the papers presented to Cabinet in January 2015 when the West End Project was approved. Much was said about service traffic then but that is not comparable to the effects of heavy demolition and construction traffic over several years. This is not mere 'service traffic' but something with the potential to cause more damaging and longer lasting impacts. There is no need for traffic controls to be relaxed to manage this; they would continue but, like emergency or Council contractors' vehicles, the controls would not be enforced for specified construction vehicles.

We therefore disagree with the "Camden conclusion" stated in the tabulated appraisal given in section 18, p24. Tottenham Court Road **is** technically 'viable' but it **is not** politically desirable. Likewise, for the reasons given above, Bedford Avenue and Bedford Square are not 'viable' nor lawful and it is improper, prior to a consultation, for Camden to "agree it works" with reference to Adeline Place when clearly displacing servicing there neither works technically nor lawfully.

247 Tottenham Court Road is a good example of the 'unintended consequences' of traffic management. As partial closures of roads like Tottenham Court Road are carried out to make them more attractive public realm, more traffic is displaced onto the remaining roads in an area. This has consequences in at least three areas:

1. Road closures in one area increase congestion on the alternative routes – this is often in fact the intention because there is a hope that increased congestion causes traffic to 'evaporate' and find other ways to meet their objective. This impact reduces as more and more roads are closed, as the number of alternative routes reduces.
2. When additional road closures are required for construction or utility works then the diversionary routes required will be much longer and more difficult to use, unless some of the closed roads are reopened or restrictions relaxed.
3. Where traffic HAS to reach a location in the area with closed roads it has to find alternative routes for access and egress. These alternative routes are usually ones that would be complicated or lengthy for traffic to use routinely, otherwise they allow vehicles to routinely circumvent the restrictions. This may be manageable for routine servicing but not for construction and demolition where vehicles are necessarily larger and

the level of vehicle traffic is much higher. They are also likely to be very difficult to use for construction and demolition vehicles for the reasons we have stated.

Of these points, 1 is clearly understood by all. 2 is recognised by at least some Councils, although we suspect not by Camden yet. It is something that has been brought up in current discussions with Camden and Westminster concerning some road changes in the Covent Garden area. We are not sure that anyone has yet thought about how to address 3, that is until 247 Tottenham Court Road came along.

TfL's Network Management team has some experience on this point. They are working with boroughs on Street Schemes and have an understanding of the issue from a network point of view. They are also currently consulting on their CMP Guidance to boroughs so this might be an opportunity to address this point head on.

The Demolition Management Plan appears to have been put together hastily with little consideration for the veracity of its content. There are a number of points that need to be reviewed and drawings that need to be checked for inaccuracies.

There is an inconsistency in the working hours given for the site. They differ in sections 9, and 19 of the CMP. Working hours need to be in accordance with the standard working hours for construction sites in Camden, reflect the proximity to a school and two institutes of higher education, and should be clearly stated without ambiguity and be enforceable.

The Cumulative Impact Area Checklist is not included as an appendix to the draft CMP and circulated as part of the public consultation. The submission should not be accepted until evidence of this having been done is supplied.

Listed buildings and conservation areas are not included in section 10 as sensitive/affected receptors.

Residential neighbours are not included in section 10 as sensitive/affected receptors.

Office and retail accommodation at 1 Bedford Avenue is not included in section 10 as sensitive/affected receptors, particularly with regard to servicing.

The statement in section 14 on neighbouring construction sites is incorrect. Details of all construction works that may have an impact in the vicinity of the

site are required not solely 'major' works. Construction works currently underway include 41, 42, 52 and 53 Bedford Square with 9, 11, 13, 33 and 35 Bedford Avenue and 112A Great Russell Street (site entrances on Adeline Place).

The swept path analysis demonstrates that a fully articulated delivery vehicle cannot be used on the proposed route without impacting the surrounding area, notably at the junction of Bedford Avenue with Adeline Place, the Bedford Avenue contra-flow cycle lane, set-down and servicing outside the St Giles Hotel, servicing on Morwell Street for the Architectural Association with offices and retail units at 1 Bedford Avenue, the kerb line at the junction of Bedford Avenue and Morwell Street, on the entire north side of Bedford Square and at the junction of Bedford Square with Gower Street. Nevertheless the table of deliveries given in section 18 gives 257 such delivery trips at various stages during the contract period. Clearly the proposed access route is unsuitable for this type of vehicle and it is misleading to state on page 24 that it is "viable". The statement on page 26 that the proposed "route can accommodate larger vehicle manoeuvres, as it was designed as part of the WEP to allow for coach vehicle access to a hotel on Bedford Avenue" is misleading and incorrect. Bedford Square and Bedford Avenue have been reconfigured through major highway works over the past 20 years to reflect their heritage sensitivity, discourage large vehicle use and to promote cycle and pedestrian use.

The same swept path analysis ignores dedicated contra-flow cycle lanes on Bedford Avenue and in Bedford Square. Indeed, the draft CMP omits consideration of all the cycle lanes on Gower Street and the contra-flow cycle lanes in Bedford Square, on Bedford Avenue and Montague Place and as proposed on Adeline Place.

In its analysis of the swept path of vehicles entering Bedford Avenue from Bloomsbury Street, it includes the comment that there is a clash with a motorcycle parking bay outside 21 Bloomsbury Street. Camden will seek to relocate this westwards to a new location outside residential buildings. That was an original proposal in the Traffic Order that was strongly opposed as it would be a nuisance to residents. The motorcycles should be relocated, but the only available place would seem to be on Bayley Street.

No 'stacking' space seems to have been identified for construction vehicles that arrive either too early or too late for their allocated time to be allowed into the 'pit lane'. Equally, there is no provision for vehicles that are turned away from site for failure to accord with site management protocols.

The table of deliveries given in section 18, page 23, gives a different number of articulated vehicle delivery trips to that given in section 19, page 27.

The bus stop on Tottenham Court Road adjacent to the south-west corner of the site should be protected from the risk of falling debris or relocated for public safety.

The newsletter circulated with the draft Demolition Management Plan states that: *"The CMP will outline how we manage construction works to the highest safety standards, minimising disruptions to neighbours"*. To the contrary, it proposes to maximise disruption to neighbours. This concerns us greatly. It has unnecessary impacts on peoples' homes and businesses; it risks the health and welfare of schoolchildren and risks damaging sensitive heritage. In recently commenting to Camden Council on another development proposal affecting Bedford Square, Historic England states the Square "is amongst the capital's finest examples of Georgian town planning and domestic architecture. As such it is of extraordinary importance". Putting all this at risk is neither considerate nor neighbourly, nor is it necessary. It does not satisfactorily demonstrate that the construction phase of the development can be carried out safely and with minimal possible impact on and disturbance to the surrounding environment, a fundamental requirement of the s106 Agreement and cannot be supported. We look to the Council to refuse to accept this approach to construction management over the coming two and a half years and look forward to seeing it revised with a less damaging alternative.

6. Name, redacted

Please find my comments on the CMP for the consultation.

As a resident of 26 Morwell Street I have the following comments;

1) The overall CMP lacks detail and substance

When compared to the DMP it is deficient especially with regard to the following point, which represents a critical flaw in the entire CMP.

2) No reference or allowance is made for inconvenience/risks to residents of Morwell St.

Reference is only made to other streets and businesses not to residents and indeed it does not appear that the contractors are even aware that there are residents on Morwell St at all.

These residents (26) specifically are those most impacted and their concerns and wellbeing should be uppermost in the planners' minds. However, their existence does not even feature. This renders the CMP flawed and therefore unacceptable.

There should be no idling outside residential buildings (specifically 26). This is consistent with the demolition management plan.

Delivery vehicle frequency makes no regard to the residents. Also, no vehicles should be left on Morwell St overnight; this is not acceptable.

3) The hours of working are unacceptable to Morwell St residents

The work is scheduled to commence too early and to carry on too late.

4) All times when Morwell St. is to be closed off should be notified in advance

5) Any work impacting services to Morwell St residents should be flagged two weeks in advance

6) Results of monitoring for dust, noise and vibration should be submitted to the 247 TCR working group for consideration

All alert details and alert frequency details need to be circulated

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:S Walford.....

Date:21/2/2022.....

Print Name:S Walford.....

Position:

Please submit to: planningobligations@camden.gov.uk

End of form.

V2.7