Cumulative Impact Area Statement – Central London

The Central London area represents just under a quarter of the total planned development activity in the borough despite only representing 13% of the geographical area. In addition to activity related to the redevelopment of sites, there is a significant amount of commercial buildings that undertake refurbishment works that have similar impacts but are not controlled by planning consents. The interaction of high levels of construction and construction traffic with established business / residential travel patterns is giving rise to heightened community concerns and mean that there is an increased need for careful management of construction activities and their potential impacts.

The area is characterised by historic buildings with narrow streets alongside high density modern developments, with residential and commercial operations sitting side by side - the area also attract a lot of tourism, and as such the movement of people is much greater than just residents and employees. The busy nature of this area means that even the smallest redevelopment may give rise to complications with traffic and reports of public nuisance.

Noise and vibration from construction sites has the potential to give rise to significant adverse effects on health and quality of life. Based on our experience we know that some of these impacts can be effectively managed. However, this potential is affected by the challenges posed by Cumulative Impacts where the impacts of various construction sites create effects of greater significance than or different to that of each individual construction site. Managing the impacts of various sites in one area and ensuring a consistent approach to noise and vibration mitigation can be a major challenge in its own right.

Redevelopment proposals need think carefully how a site will be delivered, considering issues well beyond the site boundary, in particular:

- The proximity of properties, in particular the potential for structure borne noise and dust control
- Co-ordination with neighbouring sites, considering both construction traffic and business that require deliveries
- Communication and availability of data to a wider audience who may not be in close proximity to the development but nonetheless will be impacted, such as those who work in the area.
- The area is a designated Air Quality Management Area (AQMA) and the Council has made a commitment to reduce particulate air pollution to levels recommended by the World Health Organisation. In response, all sites in the Central London area will be required to undertake the following additional obligations as part of their Construction Management Plan. Developers / Contractors will be required to justify (and for such justification to be made public) why any of the following elements cannot be achieved:

**Works**

- Assumption of no working at weekends – any proposals for weekend will be considered on a case by case basis and communicated to local residents 14 days in advance of works
- Prior to proposing any road closures, weekend working or oversize deliveries (to which all require express approval from the Council) the contractor must provide evidence that they have approached neighbouring sites and attempted to coordinate any proposals with those of the neighbouring site.
- Prior to connecting a site to utilities (Gas, Water, Electric, Telecomms) the contractor must provide evidence that they have approached neighbouring sites (and the utilities providers) and attempted to coordinate connection between neighbouring sites and the various utilities.
Communication

- CMPs will be made available online (both prior to approval and post approval) such as on a dedicated webpage
- All logs (accident, complaint) will be made available online and a physical copy made available for residents to use and view
- Where there are neighbouring site or sites in close proximity that effect the local highway network, joint communication (i.e Newsletters) will be required.
- Construction Working Groups will be conducted jointly with neighbouring sites
- All environmental monitoring data to be made available on-line and on site boards

Deliveries

- A delivery log, specifying the type of vehicle, its purpose, registration number and time on site must be maintained online and updated at least on a weekly basis.
- Contractors will be required to provide evidence that they have communicated their proposed deliveries with neighbouring construction sites and any other business, and have coordinated the deliveries where possible.
- No deliveries shall be scheduled that will require the driver to wait outside the site before 8.00am (and Vehicles will not be permitted to circulate the highway to avoid this requirement)
- A pre-booking system for managing deliveries must be operated. All deliveries must contact site at least 20min before arrival to allow the necessary checks to be undertaken

Mitigation and respite

- Adoption of localised mitigation measures such as washing the windows of neighbouring properties.
- Developments will be required to pay a Construction Impacts Bond to the Council to support the cost of Council officers addressing matters that should have been addressed by the contractor
- Dedicated wheel washing with rumble grids must be utilised unless agreed otherwise by the Council
- Green infrastructure, such as green screens/hoarding, should be utilised. Installation of filtration units, particularly where the site is near (within 250m) vulnerable receptor facilities (such as schools, nursing homes and hospitals)

Site conduct

- A firm disciplinary policy, such as a two strike warning before removal from site must be operated
- Contractors must attain the Considerate Contractors Scheme ‘Exceptional’ score
- Contractor must employ an enforcement process to ensure that contractors vehicles do not idle
- A plan and process to encourage site operatives to arrive at the site by sustainable methods (including car sharing / pooling) must be presented and communicated
- CLOCS compliance monitoring results need to be reported to council
- All sites must ensure that Traffic Marshalls / Banksmen are appropriately trained, and that there is at least one operative on duty at any given time that has at least has 1+ year of experience in that role.
- The site must be kept damp at all times, proposed equipment for this purpose must first be agreed to by the local authority.
- Weekly ‘toolbox talks’ should be conducted with all site operatives to advise of the requirements expected by the Council.
- Site operatives should be identifiable by the public to the site, such as using a uniformed colour of work jackets or branding.
Machinery and equipment

- All heavy goods vehicles (HGVs) are required to be Euro VI standard or better, and light duty vehicles (LDVs) are required to be Euro 4 petrol or Euro 6 for diesel, or better. Preference should be for zero to low emission equipment.

- NRMM should be to stage IV of EU Directive 97/68/EC as a minimum, and an up-to-date NRMM log must be kept on-site and shared with Camden officers.

- The site must connect to mains prior to works commencing to remove the need for diesel generators.

- At least four real-time PM10 monitors (certified to MCERTS standard) must be used on site in continuous operation for the duration of the build (from three months prior to implementation of planning permission through to completion on site), at locations and to thresholds approved by the Council. Camden officers must be provided access to the raw data via an online platform, and automated exceedance alerts should be sent to AirQuality@camden.gov.uk in addition to the contractor/developer on-site representatives.

- Web-enabled monitoring equipment, allowing real time information accessible by the public should be deployed – including the use of emerging technologies.

- Environmental monitoring summary reports should be sent to Camden officers on a monthly basis.