

SITE ENVIRONMENTAL MANAGEMENT PLAN

Toureen Contractors

40-46 Brook Street

London, W1K 5DB



This Site Environmental Management Plan (SEMP):

	Name	Position	Signature	Date
Prepared By	Claire Fundrey	Environmental and Sustainability Manager	<i>clairefundrey</i>	23/01/2026
Reviewed By	Matt Gifford	Senior SHEP Manager & CLOCS Practitioner	<i>MG</i>	27/01/2026
Approved By	Andy Fox	Project Director	<i>A. Fox</i>	27/01/2026

Revision Log:

Site amendments to the contents of this Site Environmental Management Plan (SEMP) are to be recorded below.

Examples include changes to site management personnel, site operations, statutory legislation or omissions and lessons learned in the event of an incident. Following planned reviews any amendments are to be recorded here including reference to the date of the review and location of the review records.

Site-Specific Amendments:

Amendment No.	Description	Revised By	Date
Rev 00	First Issue	C. Fundrey	23/01/2026
Rev 01	Logistic plan updated	A. Fox	05/02/26

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1 Introduction:

This Site Environmental Management Plan (SEMP) has been written for 40-46 Brook Street with the intent on providing an outline for planning and managing environmental matters onsite and ensuring compliance with Westminster Councils Code of Construction Practice (CoCP).

This document identifies and summarises issues relevant to the works and contains a set of procedures for managing each significant environmental issue.

The plan has been produced using our experience and knowledge of typical construction methods considered applicable for a development of this scope.

The purpose of this SEM is to:

- Identify environmental aspects of the works.
- Assisting project delivery team reducing risks of adverse impact arising from project activities.
- Identify stakeholders' requirements.
- Set out company policy and procedures in compliance with our ISO 14001:2015 Environmental Management System.
- Ensure compliance with legal requirements.

2 Project Details:

2.1 Site Location:

The site is located at address: 40-46 Brook Street, London, W1K 5DB within the administrative area of Westminster City Council.

Planning application reference: 22/04610/FULL

The site is situated in Mayfair and comprises five existing properties that have historically been linked to form a single office building.

The development site is bounded by Brook Street to the south, South Molton Lane to the east and Davies Mews to the north and adjoins No. 48 Brook Street to the west. No. 48 Brook Street has been demolished as part of the wider South Molton Triangle redevelopment, except for the retained façade. This element of the development is referred to as the South Block and will be replaced with a new reinforced concrete structure. The site is surrounded on three sides by public highways and is located within a dense city-centre environment.

The site forms part of the wider South Molton Triangle redevelopment and is directly influenced by adjacent

phases of the overall development being undertaken by other contractors. Toureen has been appointed as the preferred contractor to deliver the enabling works to the 40–46 Brook Street phase and is programmed to commence works in April 2026, subject to the discharge of pre-commencement planning conditions.

Adjacent works to the northern and southern blocks are being undertaken by Skanska, who are currently progressing steel frame and in-situ concrete works. Works along South Molton Street are being undertaken by Curo Construction and are programmed for completion in summer 2026. The respective boundaries of the works are shown on Figure 1.

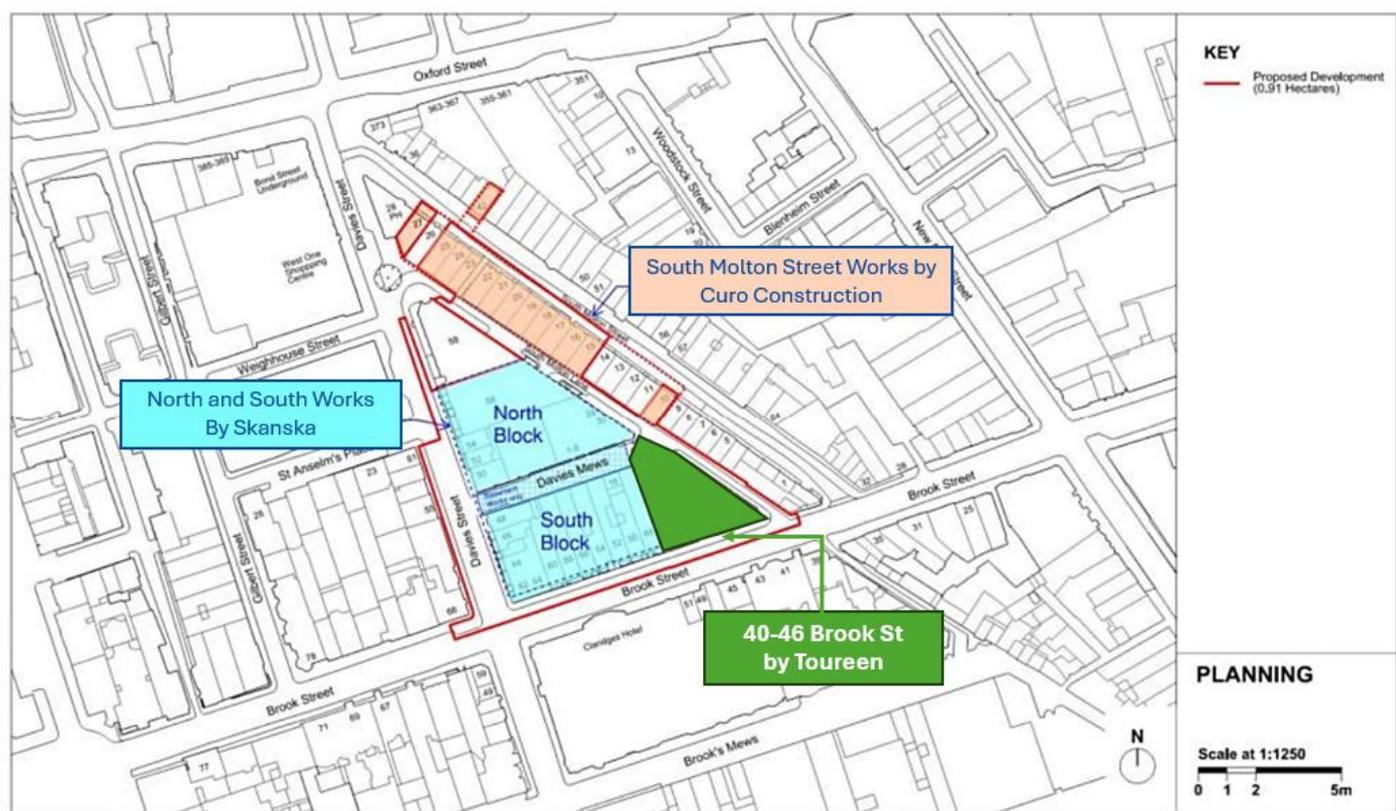


Figure 1 – South Molton Triangle Development

To the east of the site, surrounding buildings front onto South Molton Street and generally comprise three to four storey terraced properties. To the south, on the opposite side of Brook Street, neighbouring buildings include an 11 storey hotel and a five storey building, both Grade II listed.

2.2 Site Surroundings / Interested Parties:

There are a number of sensitive receptors in close proximity to the 40–46 Brook Street project. Immediately adjacent and nearby receptors include commercial properties along South Molton Street and Brook Street, including 39-41 Brook Street. Claridge’s Hotel is located to the south east of the site and represents a particularly sensitive receptor due to its hotel use.

Further nearby receptors include retail and commercial premises along South Molton Lane, which runs to the east of the project. At ground level on the corner of Brook Street and South Molton Lane is Mr Fogg’s bar,

which typically opens from 16:00 on most working days. Additional sensitive receptors include offices and the Bond Street Elizabeth Line Station within the wider South Molton Triangle area.

The information presented is based on site context during a previous phase of the overall development and will be reviewed and updated as required to reflect current site conditions and neighbouring occupancies.

The nearest sensitive receptors most likely to be directly affected by the works to 40-46 Brook Street are identified in Figure 2.

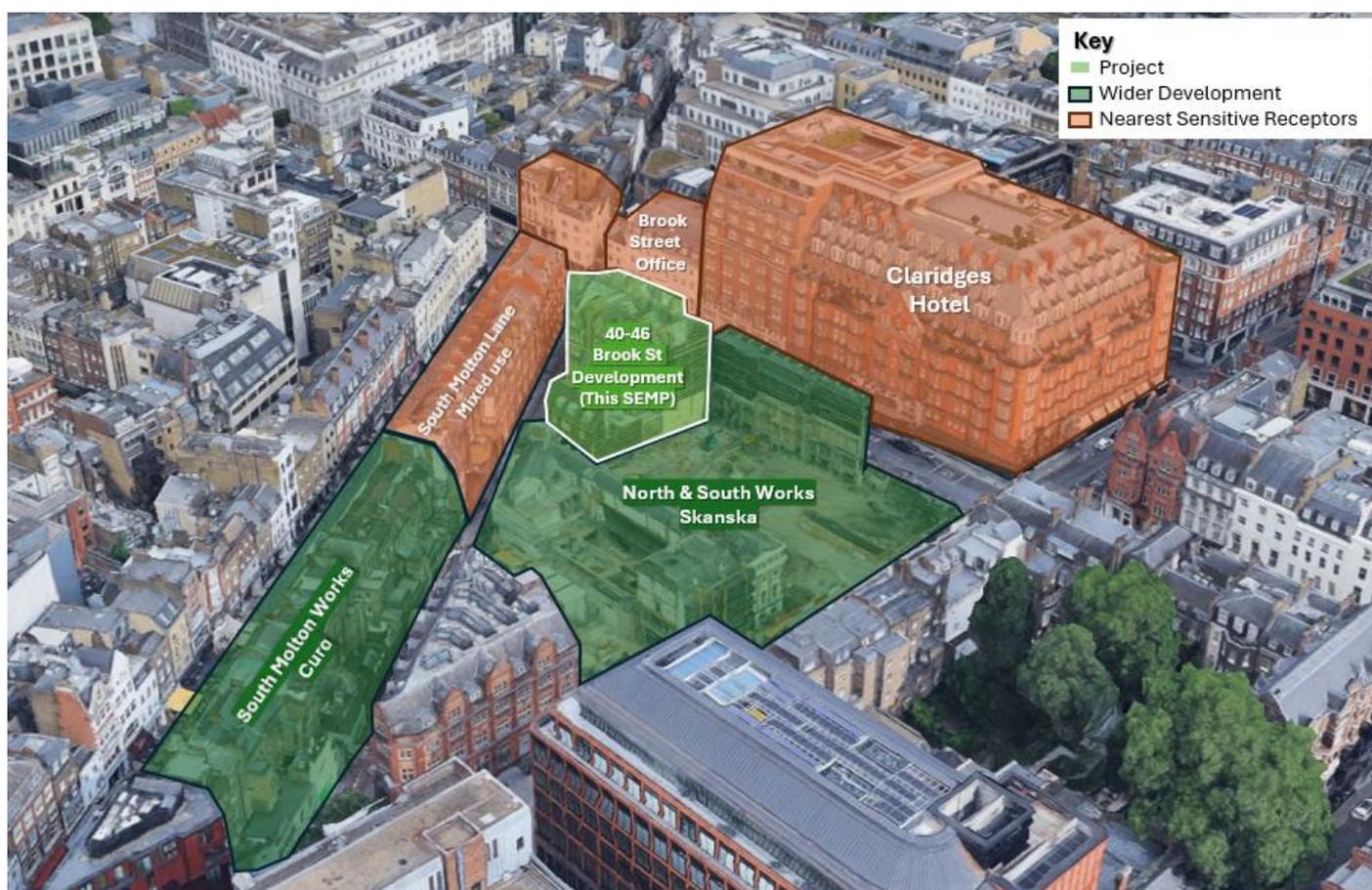


Figure 2 – Site location and nearby sensitive receptors

Adjacent development sites being undertaken by Skanska and Curo Construction are also shown for context, however, impacts arising from those works are addressed within their respective Site Environmental Management Plan (SEMP) and Section 61 consent.

Ongoing liaison and coordination between contractors will be implemented, as detailed later in this plan, to manage interfaces and minimise the potential for cumulative impacts. It is noted that wider sensitive receptors are associated with the adjoining phases of the overall development beyond the immediate 40-46 Brook Street site boundary.

As well as the adjacent building works, the site is located next to the culverted River Tyburn (below South Molton Lane) and the Crossrail tunnels.

The surrounding area comprises a mix of commercial, retail, hotel and office uses, with high pedestrian activity throughout the day. The site is situated within the Mayfair Conservation Area.

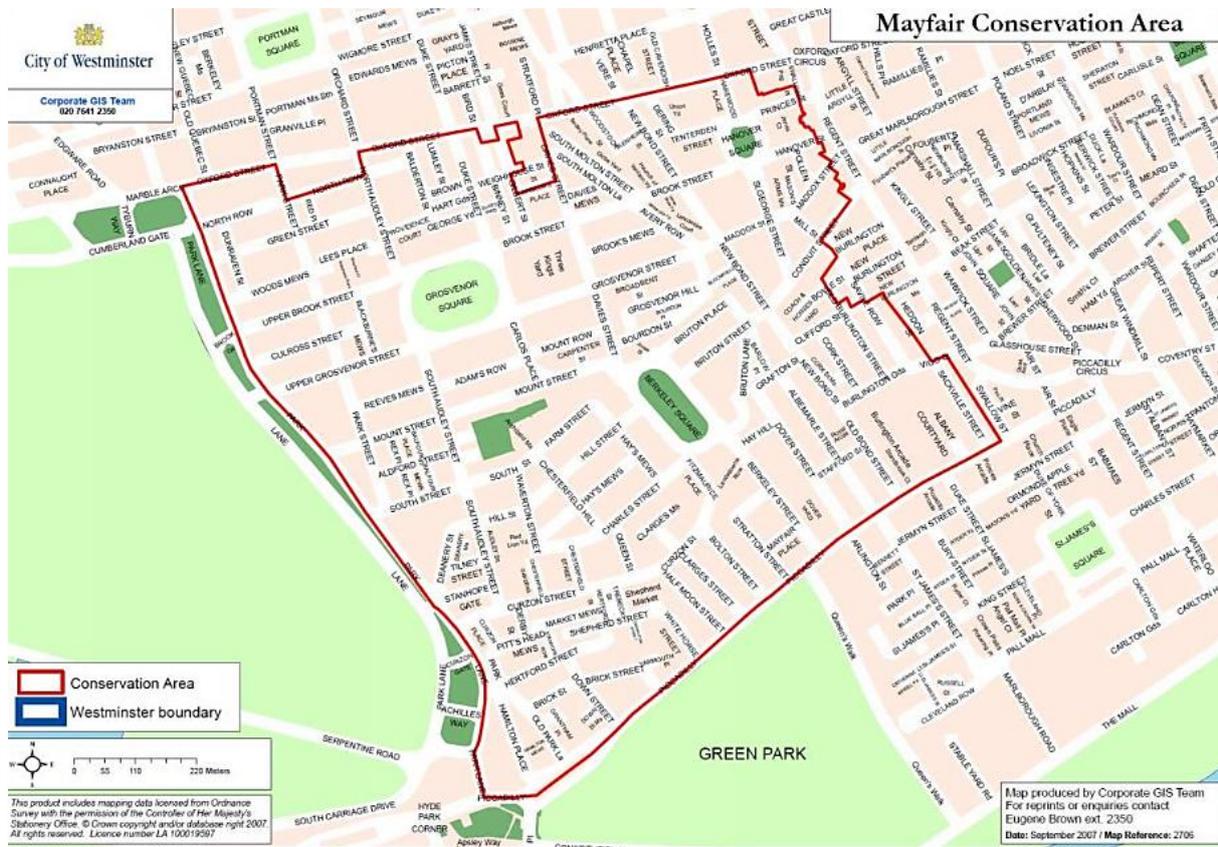


Figure 3 – Mayfair Conservation Area

2.3 Scope of works:

The overall development comprises part demolition and excavation (including works beneath Davies Mews), the erection of new buildings, and the refurbishment and alteration of existing buildings across the Brook Street, Davies Street, South Molton Lane, South Molton Street and Davies Mews area, including redevelopment behind retained and partially reconstructed façades, selective dismantling and reinstatement of architectural features, and alterations to street-level elevations.

The scheme will deliver a mixed-use development of up to nine storeys comprising Class B1 (Business), Class A1 (Shops), Class A3 (Restaurants and Cafés), Class A4 (Drinking Establishments), a composite public house with guest accommodation (sui generis), Class C1 (Hotel), Class C3 (Residential), and community infrastructure uses, together with public realm enhancements, improved pedestrian routes, servicing, plant, storage, cycle parking and other associated works. The current application relates specifically to changes to the development phase at 40-46 Brook Street.

The scope of works for Toureen covered by this SEMP includes, but is not limited to the following:

- Site establishment – Welfare within the building , logistics, perimeter hoardings, and security. Site

temporary services. Surveys and investigations.

- Isolation / diversion of incoming services to facilitate the works.
- Soft strip – including protection of heritage items.
- Scaffold – Full perimeter encapsulated scaffold with over-roof. Loading gantry of Brook St including hoist for vertical distribution.
- Temporary works to support building during structural alterations and underpinning.
- Structural alterations throughout, including removal of roof coverings, partial roof structure removal, formation of new core structures, structural openings and new structural slabs.
- Underpinning to lower basement foundations.
- New basement slab, new including below slab drainage and sewer connections.
- Roof reinstatement, including new structural steel plant floors, gable ends, turret structure and roof coverings.

2.3.1 Programme of Works

A draft works sequence programme has been developed during planning stage – see Appendix A.

Programmed works	Intended Commencement	Duration (weeks)
Site Establishment	March 2026	
Set-up welfare within building	March 2026	2.6
Site temporary services	March 2026	2.6
Works commence on site	April 2026	
Enabling works	April 2026	62 total
Hoardings & security	April 2026	1
Erect scaffolding (incl. over-roof)	April 2026	16
Soft strip	April 2026	8
Temporary works	April 2026	14
Underpinning	May 2026	24
Demolition and structural alterations	July 2026	32
Roof removal	August 2026	6
Basement works incl. drainage	November 2026	22
Roof reinstatement	January 2027	12
Strike scaffolding	April 2027	8

A flexible approach to planning, logistics and programming of the project will be required to incorporate both the best practices currently available and future trade contractor input. Additional site investigations are required to confirm the intended methodology.

Prior to the commencement of works the contractor will carry out all necessary site investigations.

It should be noted that the commencement of works is dependent upon the discharge of Pre-Commencement Conditions and the appointment of trade contractors. The client and appointed contractor will carry out all necessary site investigations.

2.3.2 Methodology

The proposed methodology sets out our intended approach to delivering the works in accordance with the draft programme. It reflects current industry practice and the information available at this stage of design and planning.

The methodology will be confirmed and developed following the completion of site investigations, detailed design coordination and the appointment of any specialist trade contractors, and prior to the commencement of works on site. Our outline methodology is as detailed below.

Site set-up and establishment

2.3.2.1 Site set-up and establishment

- Set up of welfare facilities within the existing building, including toilets, changing and drying facilities and canteen area.



Figure 4 – Proposed welfare location – Broom Street elevation.

- Complete Surveys – Structural and condition, services, hazardous materials etc.
- Install full perimeter hoarding, site access control and CCTV security. Pit lane on lane on Book St.
- Site temporary services – Power and Water, including diversion and/or redundant services.
- Protection of Heritage items.

2.3.2.2 Scaffolding & Temporary works

- Installation of full perimeter scaffolding with over-roof. Scaffolding to be encapsulated with monoflex / shrink wrap to provide weather proofing during the works along with acoustic and dust control for structural alteration works.

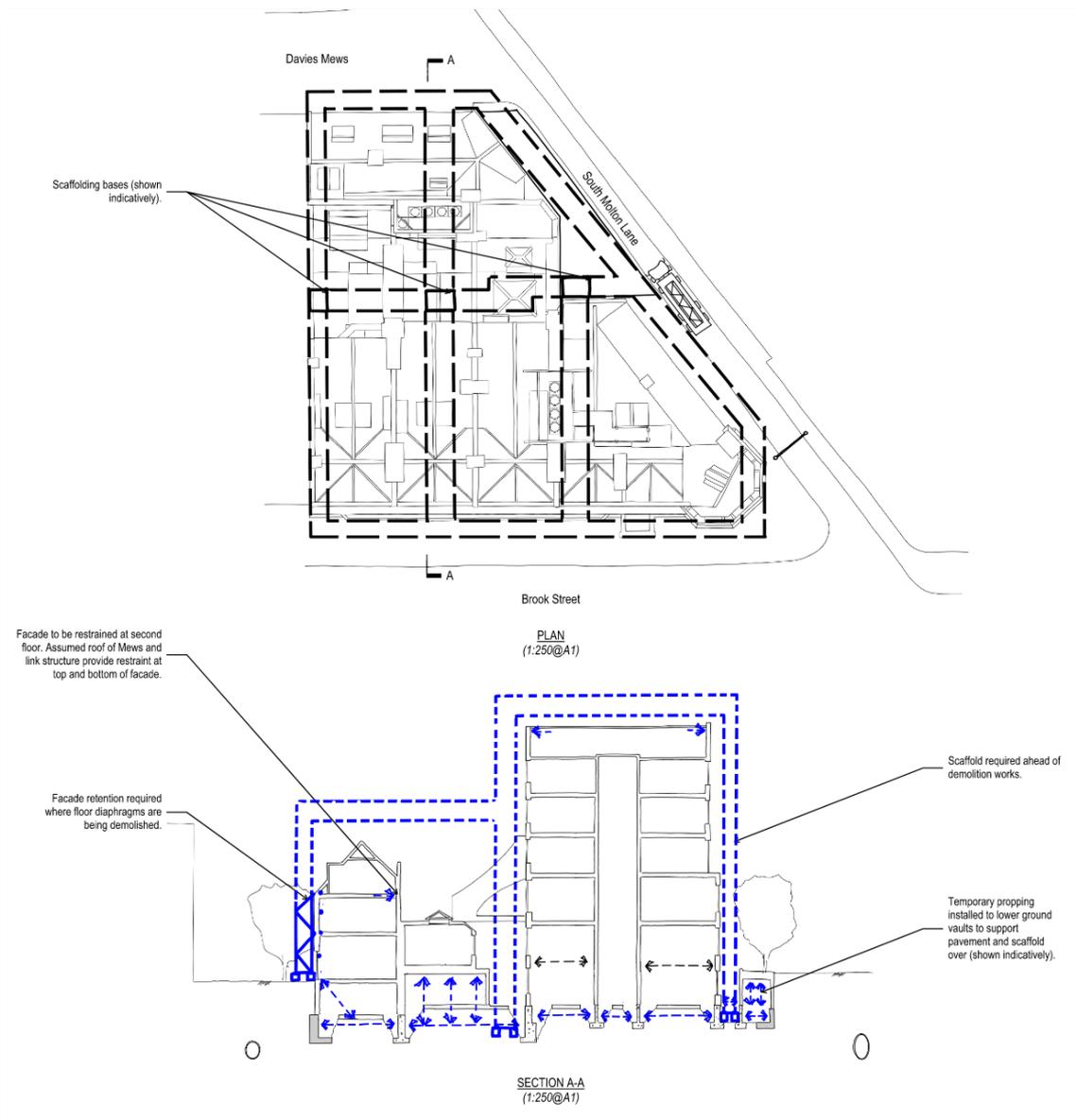


Figure 5 – Plan and section indicating scaffold and over roof.

- Installation of temporary works the building to facilitate structural alterations throughout the building.

2.3.2.3 Superstructure works

- Residual soft strip including removal of any hazardous materials and asbestos (subject to survey).
- Structural alterations to the existing roof, including partial removal, new structural steel members, plant floors and timber roof structure. Re-building of masonry gable ends and construction of new turret.

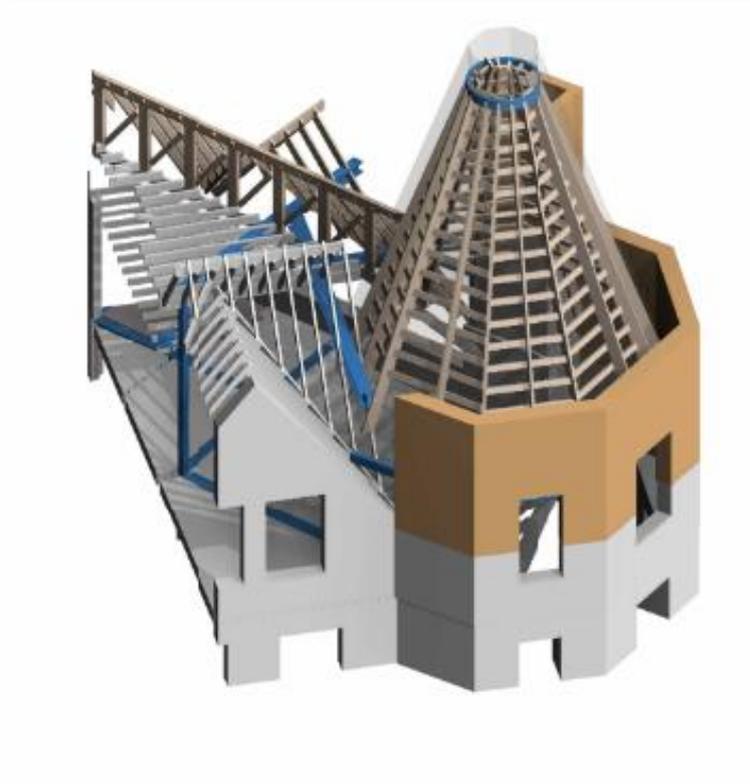


Figure 6 – New turret construction.

- Structural alterations throughout, including demolition of existing lift core and construction of new core, service risers, structural openings and structural slabs.

2.3.2.4 Underpinning

- Removal of existing ground bearing lower ground floor slab and reduce level excavation to formation of existing formation level.
- Underpinning throughout the lower ground floor, lowering foundations to create new basement space.

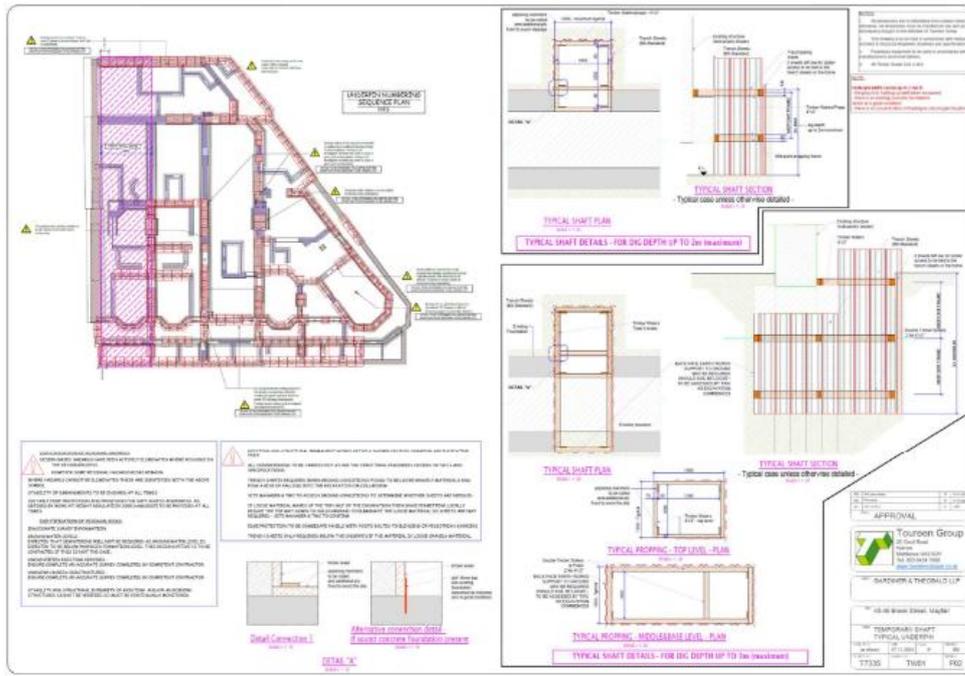


Figure 7 – Underpinning plan and associated temporary works

2.3.2.5 Substructure works

- Basement excavation to basement formation level.
- Construction of new foundations for superstructure above, including core bases and lift pits.
- New foul and storm water drainage, new including connections to Thames Water infrastructure.

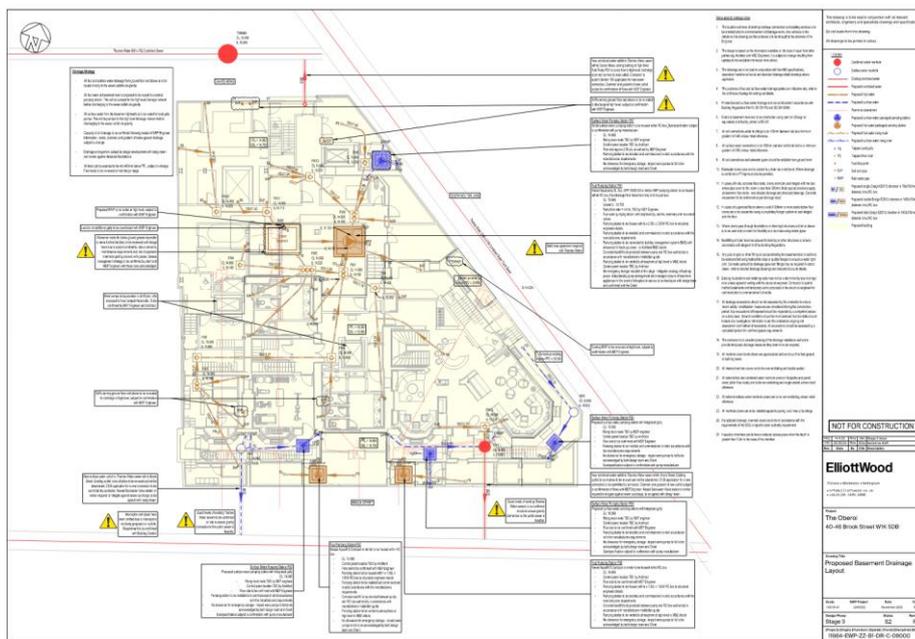


Figure 8 – Below slab drainage and new connections.

- Construction of new basement slab including waterproofing.

2.4 Hours of Work:

The site working hours will be as follows:

- between 08.00 and 18.00 Monday to Friday.
- between 08.00 and 13.00 on Saturday, when necessary, i.e. only during critical activities.

High impact noisy works will be restricted to the following hours:

- between 08.00 and 18.00 Monday to Friday.

Works outside these hours in the event of emergencies or planned works that for reasons of public safety or amenity or engineering reasons are best carried out during other periods will be subject to agreement with Westminster Borough Council via notification to:

- Westminster Environmental Health cocp@westminster.gov.uk

2.5 Site Logistics

The proposed site logistics strategy has been developed to support the safe and efficient delivery of the enabling works within a constrained city centre environment and in close proximity to sensitive receptors and adjacent construction phases.

Detailed arrangements for construction vehicle routing, delivery management, abnormal loads, pedestrian and cyclist protection, and highway interface are set out in the **Construction Logistics Plan (CLP)** appended to this SEMP.

A 2.4 m high hoarding will be maintained around the site, with controlled vehicle and pedestrian access gates, as outlined in the Construction Logistics Plan (CLP).

As limited intrusive works are required above basement level along the Brook Street elevation, it is proposed that site offices and welfare facilities will be established within the existing building in this location.

Full details of the site layout, security, welfare facilities, deliveries, traffic management and pedestrian interfaces are provided in the **Construction Logistics Plan (CLP)** included in **Appendix B**.

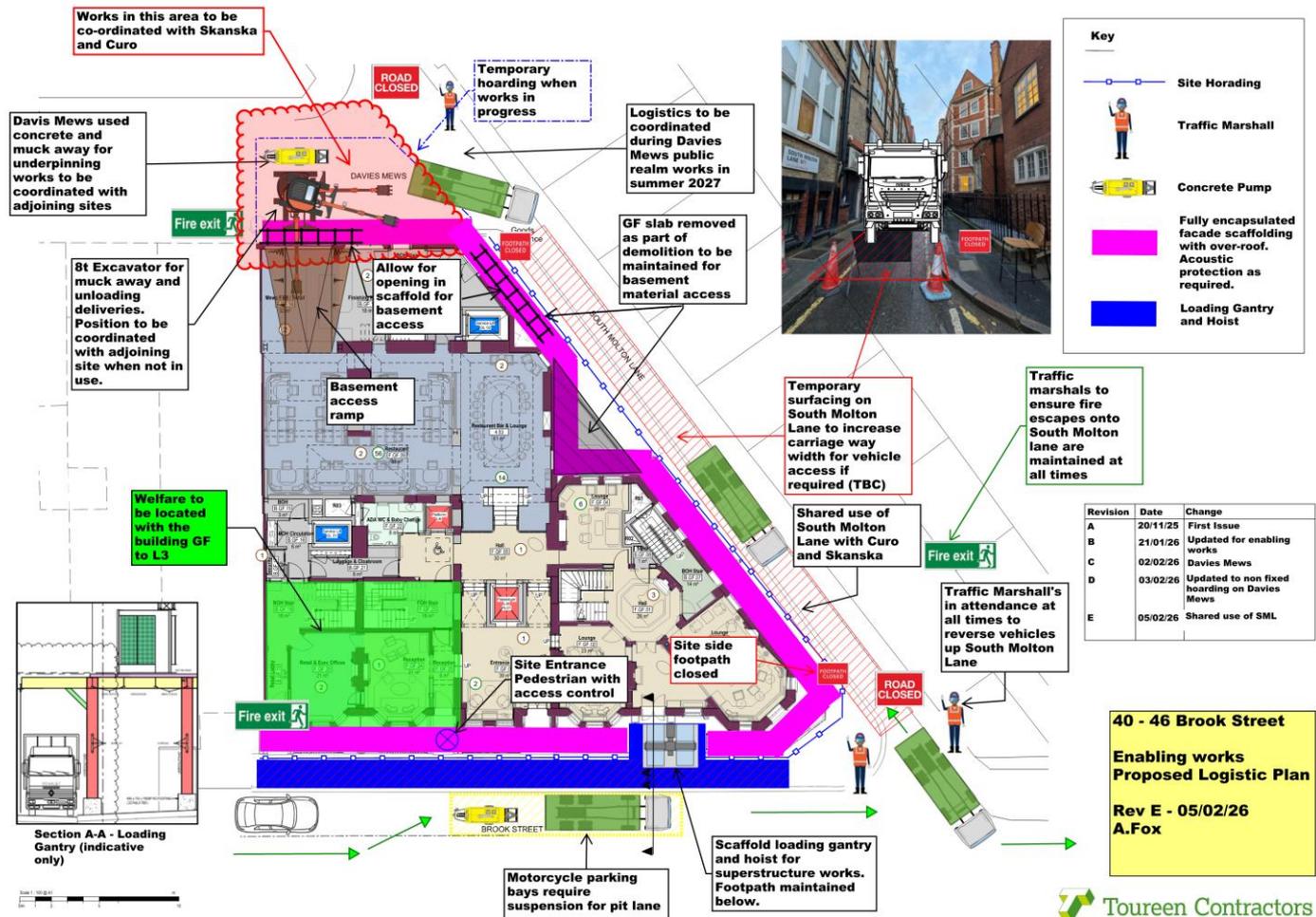


Figure 9 – Enabling Works Proposed Site Layout/Logistics Plan

2.5.1 Use of river transport

The potential use of river transport for construction materials and waste removal has been considered in line with the Westminster Code of Construction Practice. While elements of the wider supply chain may utilise river or rail transport for bulk movements prior to arrival in London, the use of river transport for the final stage of delivery to the site is not feasible.

The site is located within a dense central London street network with no direct or practical access to wharf facilities, and onward transfer from a wharf to the site would still require road-based transport. As such, the use of river transport would not result in a reduction in vehicle movements on the local highway network.

All construction materials and waste will therefore be transported to and from the site by road, with vehicle movements managed in accordance with the approved Construction Logistics Plan (CLP) to minimise impacts on the local highway network and surrounding receptors.

2.6 Project Management Structure:

Client		Project Management / Quantity Surveyor	
Name	EIH London Investments Limited c/o Ashfords LLP	Name	Gardiner & Theobald LLP
Address	Third Floor 1 New Fetter Lane London EC4A 1AN	Address	10 South Crescent, London, WC1E 7BD
Contact	Rajaraman Shankar – Director	Contact	Mary Hunter – Project Manager Adam Pleeth – Director Richard Hirshman – Partner
Email	R.Shankar@oberoigroup.com	Email	m.hunter@gardiner.com A.Pleeth@Gardiner.com R.Hirshman@Gardiner.com
Principal Contractor		Planning Consultant	
Name	Toureen Contractors Ltd	Name	Newmark
Address	25 Cecil Road, Harrow, HA3 5QY	Address	2 Eldon Street, London, EC2M 7LS
Contact	Andy Fox - Project Director	Contact	Ellen Bailey - Associate Leonie Oliva - Partner
Email	Andy.Fox@Toureen.co.uk	Email	Ellen.Bailey@nrmk.com Leonie.Oliva@nrmk.com
Architect		Structural Engineers	
Name	EPR Architects	Name	Elliot Wood
Address	All Saints, Austral Street, London, SE11 4SJ	Address	The Society Building 55 Whitfield Street London W1T 4AH
Contact	Charlotte Partridge – Associate Director	Contact	Sanja Buncic - Associate Director Tom Jerry - Associate
Email	charlotte.partridge@epr.co.uk	Email	s.buncic@elliottwood.co.uk t.jerry@elliottwood.co.uk

2.6.1 Construction Phase - Roles & Responsibilities:

The Project Manager has overall responsibility for environmental issues onsite with Toureen Environmental and SHEP Managers guidance and advice.

All roles are defined in Toureen Group responsibilities and duties procedures.

Title	Name	E-Mail
Managing Director	Ciaran McClearn	*Redacted*
Operations Director	Shane Croghan	Shane.Croghan@toureen.co.uk
Project Director	Andy Fox	Andy.Fox@toureen.co.uk
Project Manager	Anita Nash	Anita.nash@toureen.co.uk
Environmental & Social Value Manager	Claire Fundrey	Claire.Fundrey@toureen.co.uk
SHEP Manager / CLOCS Practitioner	Matt Gifford	Matt.Gifford@toureen.co.uk

3 Planning:

3.1 Environmental Aspects & Impacts:

Environmental aspects and impacts have been identified and assessed prior to the start of works and are available in the Environmental Aspect and Impact Risk Assessment for the project, incorporated into the work activity RAMS – Risk Assessment and Method Statements.

The significance of an aspect will be determined through the assessment of key drivers including legal requirements; level of risk to the environment and level of risk to the business.

3.2 Project Targets:

As part of the overall management of the project, Toureen will set targets and objectives employing environmental good practice to minimise effects on the natural environment and surrounding community.

Objective	Target
Effective Environmental Controls	<p>Zero environmental harm.</p> <ul style="list-style-type: none"> No oil or fuel spills, leakage of contaminant. No harm to ecological receptors.

Objective	Target
	<ul style="list-style-type: none"> No damage to ground or surface water.
Waste	<p>Achieve at least 95% diversion from landfill of non-contaminated waste - aim for zero non-hazardous waste to landfill.</p> <p>Maximise reuse and recycling of waste arisings.</p> <p>Minimise waste produced from construction as far as reasonably practicable, reducing avoidable wastes.</p>
Carbon / Air Quality	<p>Maximise energy efficiency & minimise exhaust emissions.</p> <p>Reduce idling.</p> <p>Collaborate with stakeholders to utilise low carbon alternative materials.</p> <p>Prioritise local procurement and suppliers.</p>
Sustainable materials and efficient use of resources	<p>All timber used onsite to be FSC or PEFC certified sustainably sourced.</p> <p>Use sustainable and responsibly sourced key construction materials where specified – (BES 6001, CARES SCS, EPD’s etc.).</p> <p>Maximise water use efficiency, adopt rainwater harvesting where practicable.</p>
Community Impact	<p>Maximise our positive contribution to the local community.</p> <p>Zero complaints of nuisance – noise, vibration, Air Quality (Dust), Lighting.</p>
Considerate Constructors Scheme (CCS)	<p>Achieve a score of at least 40 in CCS scheme audits and a minimum score of 8 for Environmental section.</p>
BREEAM Targets	<p>The development is targeting a rating of BREEAM Excellent, with an aspiration for ‘Outstanding’</p>

3.3 Environmental Legislation and Regulatory Liaison:

A register of Environmental Legislation is maintained online using the [Newground Legislation Update Service](#).

All works will be conducted in compliance with the requirements of applicable environmental law and also comply at all times with any other mandatory requirements such as those specified by relevant local planning, highways and environment health authorities, or the relevant statutory agency.

In addition, compliance with published standards, accepted industry practices, national guidelines, and codes of practice appropriate to our works package.

Regulatory organisations include, but are not limited to:

- Environment Agency (EA) - England and Wales.
- Natural England (NE).
- Local Authority (LA) – Westminster Council.
- Water companies.

4 Operational Controls:

The controls described below apply to all staff, suppliers and third parties associated with the project and covers all activities and operations.

4.1 Liaison with Interested Parties and Complaints:

Toureen will work with the Client's team to maintain effective liaison with local stakeholders throughout the works. Engagement will align with the wider South Molton Triangle arrangements, including the Community Liaison Group, regular meetings, newsletters and project website <https://southmolton.co.uk/community/>

Advance notification will be provided to neighbouring occupiers where works are expected to generate elevated noise or disruption, setting out the nature, timing and duration of activities together with site contact details. Prior to commencement, a resident briefing will be undertaken, with ongoing engagement maintained through regular liaison with neighbours, the Client and the Local Authority Environmental Health Officer.

Toureen will also liaise with relevant asset owners, including Thames Water and Transport for London (Crossrail), in relation to build over agreements and works in proximity to existing infrastructure.

4.1.1 Party Wall Matters and Adjoining Owners

The site is bounded by a public highway along one elevation, with a hotel and retail premises located on the opposite side of the road. Two further elevations adjoin land within the same overall development, being

constructed as separate phases.

As a result, formal Party Wall matters are not anticipated to apply in relation to the properties across the public highway. For adjoining areas forming part of the same wider development, liaison and coordination will be undertaken internally between project teams to ensure construction activities are appropriately sequenced and managed.

Should Party Wall matters be identified as applicable at any stage, these will be addressed by the Client through appropriately appointed professional advisers, with affected parties kept informed as required.

4.1.2 Protection of Existing Installations and Assets

The site is located within an urban environment and in proximity to existing infrastructure and services, including underground utilities and third party assets. Existing electrical infrastructure is located close to areas of proposed underpinning works.

Early engagement will be undertaken with the relevant asset owners, including UK Power Networks, to confirm protection requirements and to consider, where feasible, the potential for diversion or relocation of services.

Irrespective of whether services are retained in situ or relocated, works will be planned and carried out to ensure that all existing installations are adequately protected throughout the construction period, in accordance with asset owner requirements.

Drainage infrastructure will be protected in line with the site pollution prevention measures. Any unexpected issues will result in works being halted in the affected area and escalated for review prior to recommencement.

4.1.3 Considerate Construction Scheme:

The site will be registered and operated in accordance with the Considerate Constructor Scheme. Toureen target is to achieve a score of at least 40 in CCS scheme audits.

4.2 Complaints:

Any complaints received during the works will be acknowledged promptly, and we are committed to provide a response within 48 hours. The Project Manager will coordinate the investigation of complaints, consulting with relevant stakeholders and reviewing any available monitoring data where concerns relate to noise, dust or vibration.

Where practicable, additional mitigation measures will be considered and implemented, and further monitoring undertaken if necessary. The findings of any investigation and details of any remedial actions taken will be communicated to the complainant and recorded, with a summary provided to the Client team.

Where required, Toureen's Environmental Manager or appointed consultants will undertake a more detailed assessment of the complaint and advise on appropriate corrective actions. The results of such investigations will be reported to relevant interested parties, including Westminster City Council, where appropriate.

All complaints and associated actions will be logged to identify trends and prevent reoccurrence. Contact details for key members of the project team will be displayed on the external site notice board and made available via the project's dedicated community website.

4.3 Nuisance Prevention:

Toureen will implement appropriate mitigation measures to minimise adverse impacts on surrounding sensitive receptors throughout the works. Best Practicable Means (BPM), as defined under Section 72 of the Control of Pollution Act 1974, will be always applied.

Consideration will be given to neighbouring residents and businesses when positioning and directing site lighting, particularly during winter working hours. Lighting will be suitable and sufficient for safe site operations while avoiding nuisance to neighbouring occupiers, road users and pedestrians.

It is intended that a Section 61 consent will be sought from Westminster City Council for the works. Environmental monitoring arrangements will be implemented in accordance with the approved Section 61 consent and the project Noise, Vibration and Dust Management Plan (NVDMP).

4.3.1 Addressing Cumulative Project Impacts

There are several active construction sites in the immediate vicinity of the 40-46 Brook Street project, as shown on Figure 10, including adjacent phases of the wider South Molton Triangle redevelopment and other nearby developments.

The two adjacent South Molton Triangle sites are subject to regular coordination meetings between contractors, and Toureen will continue to engage through these forums to manage interfaces, logistics and programme overlap. Claridge's Hotel represents a particularly sensitive receptor due to its proximity and hotel use and, together with other high-sensitivity neighbouring receptors and nearby development sites, will be engaged with directly where appropriate.

The locations of the wider construction sites identified have also been considered in the planning of site access and egress routes to minimise conflict with other developments and reduce the potential for cumulative impacts.

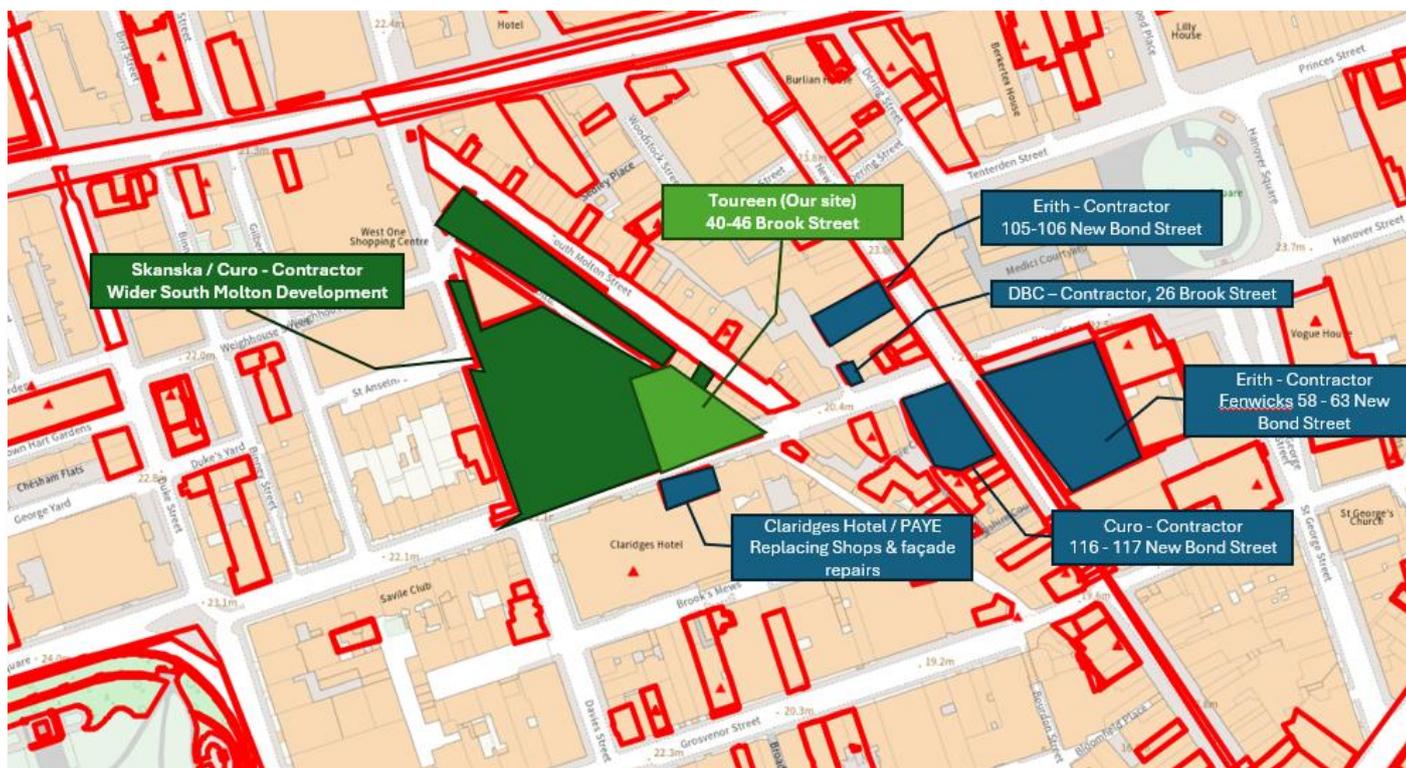


Figure 10 – Local Construction Activities in the Vicinity of the Site

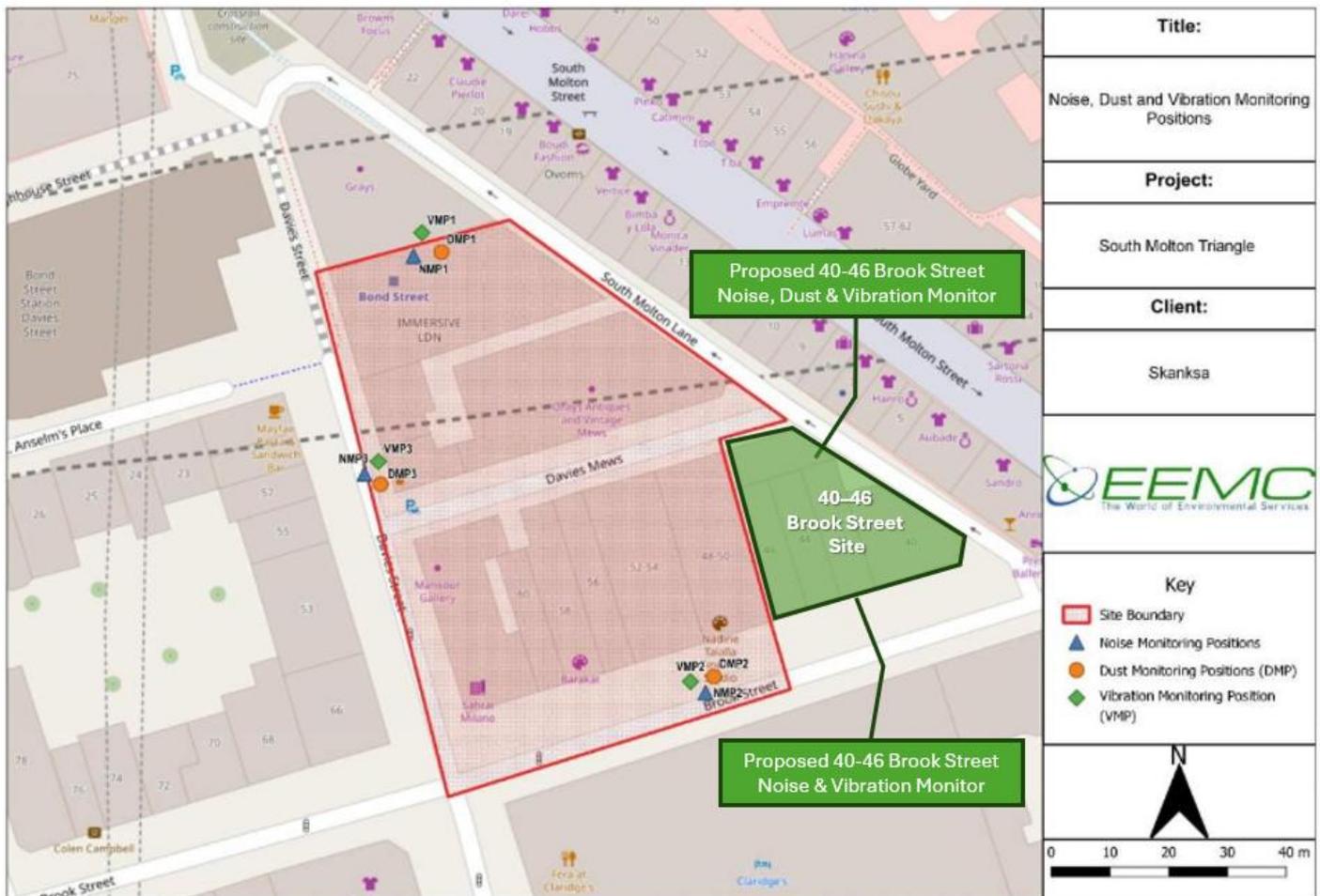
4.3.2 Environmental Monitoring Approach:

Baseline monitoring for noise, vibration and dust will be undertaken by an independent monitoring consultant prior to the commencement of works. Ongoing monitoring during the works will be carried out in accordance with the Noise, Vibration and Dust Management Plan (NVDMP) and the approved Section 61 consent.

Noise trigger levels, including 1-hour and 10-hour LAeq criteria, are defined within the NVDMP and Section 61 application. Vibration monitoring will be undertaken in accordance with BS 6472:2008. Continuous liaison will be maintained with Westminster City Council's Environmental Health team in relation to the implementation and review of noise, vibration and dust control measures.

Environmental monitoring will comprise real-time, 24-hour monitoring, with reporting arrangements, monitoring locations and noise predictions to be agreed through the Section 61 process in accordance with Westminster's Code of Construction Practice and Noise Control Guidance. Trigger levels and monitoring locations are detailed within the approved NVDMP.

The proposed environmental monitoring locations for the 40-46 Brook Street works are shown on Figure 10. For context, the figure also identifies monitoring locations associated with adjacent phases of the wider South Molton Triangle development, as provided by the Skanska project environmental monitoring consultant (EEMC).



Title:
Noise, Dust and Vibration Monitoring Positions
Project:
South Molton Triangle
Client:
Skanska

Key
 Site Boundary
 Noise Monitoring Positions
 Dust Monitoring Positions (DMP)
 Vibration Monitoring Position (VMP)



Figure 11 – Proposed Monitoring Locations (with Adjacent Monitoring Shown for Context)

4.3.3 LANAF Risk Assessment

The potential noise impacts for 40-46 Brook Street project have been assessed using the Noise Site Risk Assessment (LANAF Methodology) – London Good Practice Guide: Noise & Vibration Control for Demolition and Construction.

A - Locality and Site Information Risk Assessment:

Locality / Site Information	Low	Medium	High
Programme Duration			
<6 months			
6 months to 12 months			
>12 months			X
Proximity of nearest sensitive receptors			
>50m from the site boundary			
Between 25m and 50m			
<25m			X
Day-time Ambient Noise Level			
High ambient noise level - City centre location and existing baseline monitoring undertaken for adjacent phases of the South Molton Triangle development.	X		
Medium ambient noise level			
Low ambient noise level			

Locality / Site Information	Low	Medium	High
Working hours			
Normal working hours only [^]	X		
Some extended evening or weekend working			
Some night-time working			
SUBTOTAL A			
Add up the number of ticks in each column	2		2

B - Works Information:

Works Information	Low	Medium	High
Location of works			
Majority within existing complete building envelope	X		
Majority of works external			
External demolition			
Limited to 2 weeks ¹² <ul style="list-style-type: none"> - Roof removal – non-percussive, hand tools and cutting - Removal of one external slab on South Molton Lane by handheld breakers less than a week of work. 	X		
External demolition between 2 weeks and 3 months ¹²			
External demolition greater than 3 months ¹²			
Ground works			
Limited to non-percussive methods (i.e. hand tools / small excavator / small backhoe)	X		
Percussive methods ¹³ less than 3 months ¹² <ul style="list-style-type: none"> - Internal removal of basement slab – by percussive methods circa 2 weeks 		X	
Percussive methods greater than 3 months ¹²			
Piling – N/A			
Limited to 1 week ^{12 14}	X		
Bored piling only. No impact or vibratory piling			
Impact or vibratory piling			
Vibration generating activities			
Limited to less than 1 week	X		
Between 1 week and 1 month			
Greater than 1 month <ul style="list-style-type: none"> - Underpinning works 			X
Street management			
Required for less than 1 week / or not at all	X		
Required for less than 1 month			
Required for greater than 1 month			X
SUBTOTAL B			

Works Information	Low	Medium	High
Add up the number of ticks in each column	2	1	2

Total Risk Assessment:

Assessment Criteria	Risk		
	Low	Medium	High
Risk Assessment A - Subtotal	2		2
Risk Assessment B – Works Information For the highest number of ticks in SUBTOTAL B, 1 tick to the equivalent risk comment			✓
Total	2		3

4.3.3.1 Good Practice Measures

Good practice measures to be adopted in line with the LANAF assessment.

	Mitigation for all Risk Sites	Mitigation Measures to be considered highly recommended for high-risk sites
General Considerations	<p>Designated site-based staff must have the authority to ensure noise and vibration are properly controlled and managed based on site circumstances.</p> <p>All site staff must be briefed on their responsibilities regarding Best Practicable Means (BPM) for minimising construction noise and vibration, along with relevant planning consents, codes of construction, or legal agreements.</p> <p>Staff training on noise and vibration management should be regularly reviewed and repeated throughout the project.</p> <p>Site hoarding must be built and maintained to reduce noise levels for sensitive buildings and land uses.</p> <p>Contact details of the contractor and responsible site manager, along with working hours and other site information, should be displayed on the hoarding.</p> <p>Site access should be located away from noise-sensitive receptors.</p> <p>Internal haul routes must be well maintained and avoid steep gradients.</p>	<p>Submit a Section 61 consent application to the local authority</p> <p>Adhere to 'quiet hours' as agreed and/or adopted by the local authority.</p> <p>Maximise the screening effect of buildings and temporary stockpiles through programming / phasing of works.</p> <p>Use rubber linings in chutes, dumpers and hoppers to reduce impact noise.</p> <p>Minimise opening and closing of site access gates through good coordination of deliveries and vehicle movements.</p>

	Mitigation for all Risk Sites	Mitigation Measures to be considered highly recommended for high-risk sites
	<p>Limit material and plant loading/unloading to normal working hours.</p> <p>Reduce loading/unloading heights for muck away and material movement to mitigate noise impact.</p> <p>Handle all materials in a way that minimises noise.</p> <p>Consider joining the Considerate Constructors Scheme.</p> <p>Consult WCC's Code of Construction Practice.</p>	
Plant	<p>Ensure that each item of plant and equipment complies with the noise limits quoted in the relevant</p> <p>European Commission Directive 2000/14/EC, United Kingdom Statutory Instrument (SI) 2001/1701.</p> <p>Fit all plant and equipment with appropriate mufflers or silencers of the type recommended by the manufacturer.</p> <p>Follow manufacturer's guidance and measures to operate plant and equipment and use it in a manner which minimises noise.</p> <p>Use all plant and equipment only for tasks for which it has been designed for.</p> <p>Shut down all plant and equipment in intermittent use in the intervening periods between works or throttle it down to a minimum.</p>	<p>If possible power all plant and equipment by mains electricity or other quieter technology rather than locally powered sources such as generators.</p> <p>Maximise screening from existing features / structures, or employ the use of full or partial enclosures for fixed plant. The enclosures should be well maintained. Fixed plant can include generators, compressors, pumps, batching plant and ventilation plant.</p> <p>Locate and orientate fixed or semi-static plant away from noise sensitive receptors.</p> <p>Consider additional measures to control noise for any plant required to operate on a 24-hour basis; for example, dewatering pumps or generators used to power site security.</p> <p>Vibratory compaction equipment shall be used in a mode which minimises the incident vibration at nearby residential and other sensitive properties.</p>
Vehicle Activity	<p>Ensure all vehicle movements occur within normal hours or at agreed times, taking into account the primary function of sensitive receptors in the vicinity (i.e. avoiding school drop-off/pick-up periods).</p> <p>Maximise the reuse of any waste arising on site to minimise vehicle movements.</p> <p>Plan deliveries and vehicle movements so that vehicles are not waiting or queuing on the public highway. If waiting or queuing is unavoidable then engines should be turned off.</p> <p>Minimise opening and closing of site access through good coordination of deliveries and vehicle movements.</p>	<p>Plan site layout to ensure that reversing is kept to a practicable minimum, and where practicable eliminated altogether.</p> <p>Where reversing is required, use broadband reverse sirens / alarms or, where it is safe to do so, disengage all sirens and alarms and use banks-men.</p> <p>Produce a robust Construction Traffic Management Plan to plan, manage and minimise vehicle movements. Avoid unnecessary impact on sensitive receptors, traffic diversions via other sensitive areas or bottlenecks (see TfL guidance).</p> <p>Consider potential accumulation of traffic from other local construction sites and plan delivery</p>

	Mitigation for all Risk Sites	Mitigation Measures to be considered highly recommended for high-risk sites
		<p>routes and times to avoid congestion.</p> <p>Rubber/ Neoprene (or similar non- metal lining material) matting to line the inside of material transportation vehicles so as to avoid the 'first drop' high noise levels.</p> <p>Where site space is limited and volume of vehicles attending site is high, seek vehicle holding bay(s) to use with 'Just in time' delivery management systems</p> <p>Space planning for stockpiling of material (over weekends and, evening and nights) within the site to allow removal during normal working hours only.</p> <p>Consider alternative means of transport, e.g. river and rail</p>
Demolition Phase	Employ the use of acoustic screening; this can include planning the demolition sequence to utilise screening afforded by buildings to be demolished.	<p>If working out of hours on safety grounds, limit high noise/vibration demolition activities to normal hours wherever practicable.</p> <p>Avoid demolition activities outside of normal working hours through the use of temporary measures, such as safety / protection fences, to enable works to be conducted during normal working hours.</p> <p>Utilise low impact demolition methods such as non – percussive plant wherever practicable</p> <p>Use rotary drills and “bursting” activated by hydraulic or electrical power, or chemically based expansion compounds, to facilitate fragmentation and excavation of hard material.</p> <p>Avoid the transfer of noise and vibration from demolition activities to adjoining occupied buildings through cutting any vibration transmission path or by structural separation of buildings.</p> <p>Rather than breaking in-situ, consider the removal of larger sections by lifting them out and breaking them down either in an area away from sensitive receptors or off-site.</p>
Groundworks and Piling	Avoid percussive piling wherever possible.	<p>If working outside of normal hours on safety grounds, limit major excavation works to normal working hours.</p> <p>Adopt the following hierarchy of groundwork / piling methods, in order of preference to minimise the impact of piling, if ground conditions, design and safety allows:</p> <p>Pressed-in methods, e.g. Hydraulic jacking, Auger / bored piling, Diaphragm Walling,</p>

	Mitigation for all Risk Sites	Mitigation Measures to be considered highly recommended for high-risk sites
		<p>Vibratory piling or vibro-replacement, Driven piling or dynamic consolidation</p> <p>Consider the location and layout of the piling plant for efficient operation and potential noise control of generators and any electric or hydraulic motors used by plant.</p> <p>Where impact piling is the only option, utilise a non-metallic dolly between the hammer and driving helmet, or enclose the hammer and helmet within an acoustic shroud.</p> <p>Consider concrete pour sizes and pump locations. Plan the start of concrete pours as early as possible within normal working hours to avoid overruns.</p> <p>Where obstructions are encountered stop works and review approach; adopt work methods that minimise noise and vibration.</p> <p>Prepare pile caps using methods / procedures which minimise the use of breakers, e.g. using hydraulic splitters to crack the top of the pile</p>
<p>Construction</p>	<p>When working within a building ensure all openings (e.g. windows and doors) are closed or sealed up.</p> <p>Plan the site layout to maximise screening from existing features / structures.</p>	<p>Use prefabricated building structures or elements to minimise noise on site.</p> <p>Where on-site fabrication is unavoidable, all high noise level works should be carried out within normal hours.</p> <p>Consider concrete pour sizes and plan the start of concrete pours as early as possible within normal working hours to avoid overruns.</p> <p>Where practicable consider using an on-site, noise attenuated, concrete batching plant to minimise overruns and disturbance from queuing delivery wagons from off-site and remote facilities.</p> <p>Obtain and agree a protocol with concrete suppliers and sub-contractor with measures to ensure that as far as practicable overruns on concrete pours do not occur.</p>
<p>Monitoring</p>	<p>Establish pre-existing levels of ambient noise.</p> <p>Carry out attended noise monitoring at the start of any new phase of works, to check source sound emission data from plant on-site and following any complaints.</p> <p>Carry out regular on site observation monitoring and checks/ audits to ensure that BPM is being employed at all times. Such</p>	<p>Monitor noise continuously during demolition, piling, excavation and sub- and superstructure works at agreed locations and report to the local authority at agreed intervals.</p> <p>Monitor vibration continuously during demolition, piling, excavation and sub-structure works at agreed locations and report to the local authority at agreed intervals.</p> <p>Appraise and review working methods, procedures and logistics on a regular basis to</p>

	Mitigation for all Risk Sites	Mitigation Measures to be considered highly recommended for high-risk sites
	<p>checks should include:</p> <ul style="list-style-type: none"> • Hours of working • Presence of mitigation measures, equipment (engine doors closed, airlines not leaking, • etc.) and screening (location and condition of local screening, etc.) • Number and type of plant • Construction method, and • Where applicable, any specific Section 61 consent conditions. <p>The site reviews should be logged and any remedial actions recorded.</p>	<p>ensure continuous development of BPM.</p> <p>Establish level trigger alerts in agreement with the local authority and guided by BS5228. Monitor noise and vibration to trigger text alerts; where levels exceed the triggers then inform the local authority, review work practices and agree additional mitigation measures with the local authority.</p> <p>Use monitoring equipment with web access capabilities to view and inspect real time measurement and/or audio data.</p>
<p>Communication and Liaison</p>	<p>Develop a Community Liaison Plan. Develop a Complaint Procedure (see Appendix 6) with timescales for responses and a nominated liaison person to engage with residents and to handle complaints. These should be agreed with the local authority.</p> <p>Display contact details for the site manager and liaison officer prominently on the site hoarding.</p> <p>Brief all site staff regarding the complaints procedure and mitigation requirements and their responsibilities to register and escalate complaints received.</p>	<p>Send regular updates at appropriate intervals to all identified affected neighbours via newsletter and posting information on the site hoarding. Also make information available via email when requested.</p> <p>Develop and maintain a website to provide information about the project and to receive feedback.</p> <p>Arrange regular community liaison meetings at appropriate intervals including prior to commencement of project.</p> <p>Respond to issues raised and report back to attendees.</p> <p>Arrange meetings and communicate on a regular basis with neighbouring construction sites to ensure activities are coordinated to minimise any potential cumulative issues.</p> <p>Advise neighbours about reasons for and duration of any permitted works outside of normal working hours.</p> <p>Arrange meetings and communicate on a regular basis with the local authority to monitor the progress of the works and to consider any concerns or complaints raised by the local community.</p>

4.3.4 Air Quality and Dust Control Measures:

An Air Quality and Dust Risk Assessment is being prepared in accordance with the Mayor of London’s Control of Dust and Emissions During Construction and Demolition SPG and IAQM guidance. The assessment will evaluate the potential risk of dust soiling and human health impacts associated with demolition, earthworks, construction activities and track-out.

The completed assessment will be submitted to the Local Authority for approval. The findings and confirmed risk classification will be incorporated into this SEMP prior to commencement of works.

A summary of the confirmed dust risk ratings will be included below once agreed with Westminster City Council.

Potential Impact	Risk			
	Demolition	Earthworks	Construction	Track out
Dust Soiling	To be confirmed following assessment			
Human Health	To be confirmed following assessment			

Pending completion of the formal assessment, Toureen will apply Best Practicable Means (BPM) at all times and implement appropriate dust mitigation measures proportionate to a medium to high-risk urban site. These measures will include, as a minimum, damping down of works, covering of skips and vehicles, wheel cleaning where required, effective site housekeeping and monitoring of site conditions.

Measure	Scale and Risk		
	Small	Medium	Large
Develop and implement a stakeholder communications plan that includes community engagement before work commences on-site.			
Display the name and contact details of person(s) accountable for air quality and dust issues on the site boundary. This may be the environment manager/engineer or the site manager.			
Display the head or regional office contact information.			
Record all dust and air quality complaints, identify cause(s), act appropriately to reduce emissions in a timely manner, and record the measures taken. Make the log available to LPA if required.			
Record any exceptional incidents that cause dust and/or air emissions, either on- or offsite, and the action taken to resolve the situation in the logbook.			

Measure	Scale and Risk		
	Small	Medium	Large
Hold regular liaison meetings with other high risk construction sites within 500m of the site boundary, to ensure plans are coordinated and dust and particulate matter emissions are minimised. It is important to understand the interactions of the off-site transport/deliveries which might be using the same strategic road network routes.			
Undertake daily on-site and off-site inspection, where receptors (including roads) are nearby, to monitor dust, record inspection results, and make the log available to the local authority when asked. This should include regular dust soiling checks of surfaces such as street furniture, cars, and windowsills within 100m of site boundary, with cleaning to be provided if necessary.			
Increase the frequency of site inspections by the person accountable for air quality and dust issues on site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions.			
Agree dust deposition, dust flux, or real-time PM10 continuous monitoring locations with the Local Authority. Where possible commence baseline monitoring at least three months before work commences on site or, if it a large site, before work on a phase commences. Further guidance is provided by IAQM on monitoring during demolition, earthworks, and construction.			
Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible.			
Erect solid screens or barriers around dusty activities or the site boundary that are at least as high as any stockpiles on site.			
Fully enclose site or specific operations where there is a high potential for dust production and the site is active for an extensive period			
Avoid site runoff of water or mud.			
Keep site fencing, barriers and scaffolding clean using wet methods.			
Remove materials that have the potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on-site cover as described below.			
Cover, seed or fence stockpiles to prevent wind whipping.			
Ensure all NRMM meet the highest emission standards, where applicable.			
Ensure all vehicles switch off engines when stationary - no idling vehicles.			

Measure	Scale and Risk		
	Small	Medium	Large
Avoid the use of diesel and petrol powered generators and use mains electricity or battery powered equipment where practicable.			
Impose and signpost a maximum-speed-limit of 15 mph on surfaced and 10 mph on unsurfaced haul roads and work areas (if long haul routes are required these speeds may be increased with suitable additional control measures provided, subject to the approval of the nominated undertaker and with the agreement of the local authority, where appropriate).			
Implement a Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking, and car-sharing).			
Only use cutting, grinding, or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g. suitable local exhaust ventilation systems.			
Ensure an adequate water supply on the site for effective dust/particulate matter suppression/mitigation, using non-potable water where possible and appropriate.			
Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate.			
Ensure equipment is readily available on site to clean any dry spillages and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.			
Avoid bonfires and burning of waste materials.			
DEMOLITION SPECIFIC			
Soft strip inside buildings before demolition (retaining walls and windows in the rest of the building where possible, to provide a screen against dust).			
Ensure effective water suppression is used during demolition operations. Handheld sprays are more effective than hoses attached to equipment as the water can be directed to where it is needed. In addition high volume water suppression systems, manually controlled, can produce fine water droplets that effectively bring the dust particles to the ground.			
Avoid explosive blasting, using appropriate manual or mechanical alternatives.			
Bag and remove any biological debris or damp down such material before demolition.			
EARTHWORKS SPECIFIC			

Measure	Scale and Risk		
	Small	Medium	Large
Re-vegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable.			
Only remove the cover in small areas during work and not all at once.			
CONSTRUCTION SPECIFIC			
All contractors and sub-contractors to be made aware of and sig-up to the dust management scheme.			
Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place.			
Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery.			
For smaller supplies of fine power materials ensure bags are sealed after use and stored appropriately to prevent dust.			
TRACKOUT SPECIFIC			
Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material tracked out of the site. This may require the sweeper being continuously in use.			
Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport.			
Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable.			
Record all inspections of haul routes and any subsequent action in a site logbook.			
Install hard surfaced haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowsers and regularly cleaned.			
Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).			
Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits.			

4.3.4.1 Non-Road Mobile Machinery:

Non-road mobile machinery (NRMM) will be in full compliance with NRMM emissions requirements (NRMM between 37kW and 560kW to meet EU Directive 97/68/EC) and its subsequent amendments.

The project is in the Central Activity Zone where engine emissions requirements are Stage IV. Plant used on site will be registered and compliant with this Non-Road Mobile Machinery Regulations for London.

4.3.4.2 On-Road Vehicles

Our Construction Logistics Plan includes the requirement for all vehicles servicing the project to be compliant to London low-emission zones (LEZs).

4.4 Lighting Control:

Our lighting strategy is in accordance with 'Guidance Notes 01/20 For The Reduction Of Obtrusive Light' and is as follows:

- Identifying the sensitive receptors surrounding the site.
- Positioning/directing lighting away from these sensitive receptors.
- Using directional lighting.
- Using appropriate levels of illumination.
- Lighting areas only when and where required.
- Installing hoods, shields, reflectors, and baffles to mitigate or reduce light spillage.

We will promote a "switch off" scheme which will avoid unnecessary light pollution from site compounds or site offices. We will use an appropriate powered light, considering that the maximum deemed to be suitable for exterior security lighting is 2000 lumens or 150w.

4.5 Waste Management:

A Pre-Refurbishment Audit has been completed for the project by Reusefully (*Reusefully Pre-Refurbishment Audit Report - 40-46 Brook St - 26.08.2025*). The audit provides an assessment of anticipated material arisings from the proposed refurbishment works and identifies opportunities for reuse, recycling and diversion from landfill.

The audit estimates that approximately 910 tonnes of material will arise from the works, with the majority comprising concrete and cementitious materials, brick, timber, gypsum and metals. Based on the findings, a target of 99% diversion from landfill by weight is recommended, together with a reuse target of approximately 7%, supported by identified opportunities for the reuse of materials such as bricks, timber flooring, doors, roof slates and fixtures and fittings.

The waste hierarchy will be applied throughout the project, with waste prevention and reuse prioritised

wherever practicable, followed by recycling and recovery, and disposal as a last resort. Waste will be segregated on site where space and logistics allow and stored within designated areas prior to removal by licensed waste contractors to appropriately permitted facilities. Where on-site segregation is not practicable, waste will be transferred off-site for segregation by specialist contractors.

The waste hierarchy



All waste movements will be recorded, with quantities reused, recycled, recovered or sent to landfill monitored and reported. Any hazardous waste arising will be managed by licensed contractors in accordance with relevant environmental and health and safety legislation, with consignment notes obtained. Waste transfer notes and consignment notes will be retained on site in accordance with Duty of Care requirements.

Skips and containers will be sheeted during transit to prevent the escape of materials onto the public highway.

4.6 Water Management:

Water consumption during the works will be minimised through good site practice and monitoring. Opportunities for the use of non-drinking water, such as grey water will be considered where practicable.

No discharges to foul or surface water drains will take place other than clean, uncontaminated rainwater and only where appropriate consents are in place. All discharges will comply with consent conditions, with any non-compliant discharge stopped immediately and corrective measures implemented.

Thames Water is the principal sewerage undertaker for the area, and several major combined sewers, including the culverted River Tyburn beneath South Molton Lane, are in close proximity to the site. These assets will be protected throughout the works, and approval will be sought from Thames Water where required.

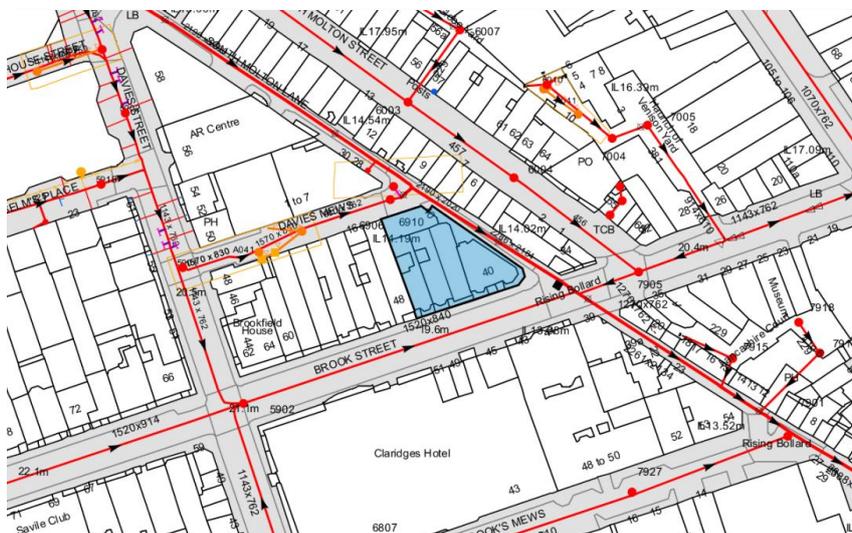


Figure 12 – Extract of Thames Water Asset Records

A CCTV drainage survey has identified existing drainage outfalls that are unsuitable for the proposed basement lowering. The existing drainage network will therefore be abandoned and replaced as part of the permanent drainage strategy.

The Environment Agency's Indicative Flood Map shows the site to be located within Flood Zone 1. A Flood Risk Assessment has been undertaken and its recommendations will be followed. Surface water and groundwater will be protected through the implementation of best practice pollution prevention measures, including appropriate storage of fuels and chemicals, plant maintenance, spill response procedures and provision of spill kits as detailed later in this SEMP.

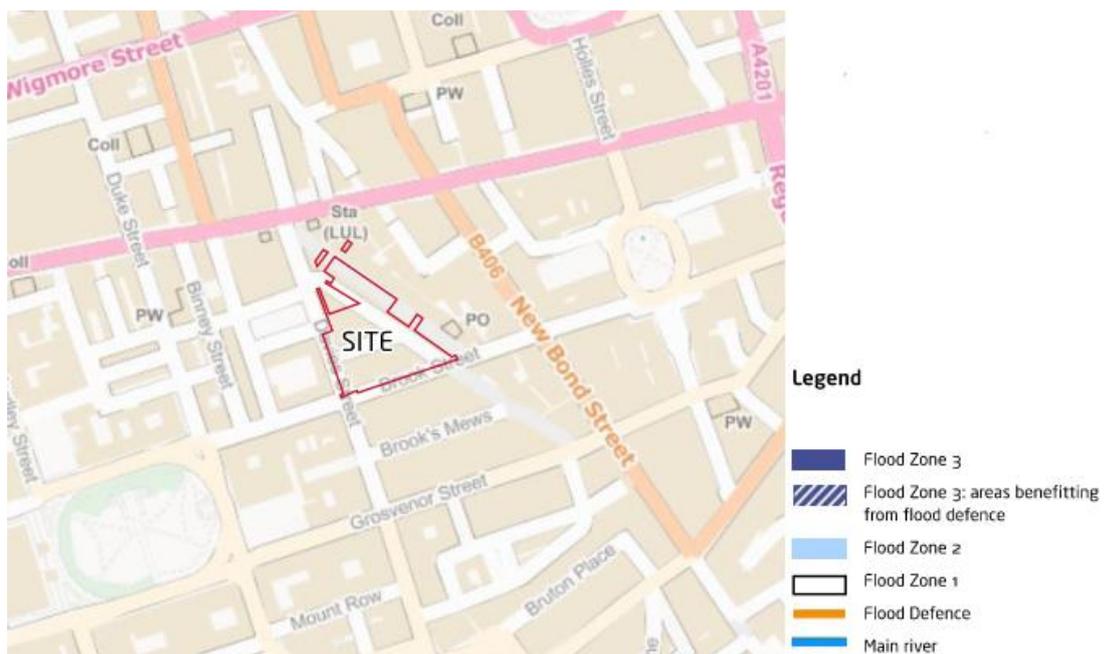


Figure 13 – Environment Agency Indicative Flood Map for Whole South Molton Development Site

4.7 Contaminated Land:

Previous site investigations and design stage assessments undertaken as part of the South Molton Triangle redevelopment have informed the understanding of ground conditions at the site, including the presence of Alluvium over London Clay and shallow groundwater conditions.

These assessments have not identified any confirmed widespread contamination; however, further investigation and contamination testing are required at subsequent stages to fully characterise site conditions.

Given the site's historic urban use and the nature of the proposed cut-and-carve and underpinning works, the potential for localised contamination cannot be discounted. Excavation works will therefore be subject to a watching brief, with inspections undertaken for any unexpected or unusual materials, including discoloured soils, unusual odours, buried tanks, drums or contaminated groundwater.

Should suspected contamination be encountered, works in the affected area will cease immediately, the Client will be informed and appropriate risk assessments reviewed. Further investigation and mitigation

measures will be agreed as necessary prior to works recommencing.

Any contaminated materials identified will be segregated from uncontaminated materials and managed within designated contained areas to prevent the spread of contamination. Removal and disposal will be undertaken by licensed contractors in accordance with relevant environmental and health and safety legislation. UK radon mapping indicates the site lies within an area of low radon potential (less than 1%).

4.8 Unexploded Ordnance (UXO):

As shown on the Bomb Damage Maps, a number of structures adjacent to the site suffered general blast damage and in some cases were damaged beyond repair. The buildings on the site are not noted as having any blast damage. However, according to Zetica’s map of unexploded ordnances (UXO) there is a moderate risk of unexploded bombs for the site location and surrounding area.

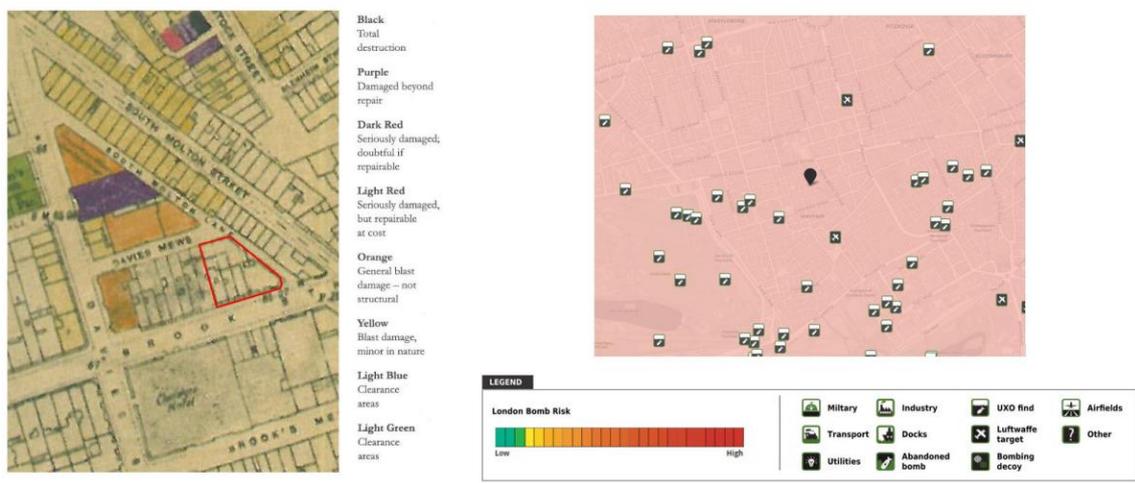


Figure 14 – Extract from Bomb Damage Maps (left) and Zetica UXO risk map (right)

4.9 Urban Ecology:

Disturbance to protected areas, species and areas of conservation will be minimised and the project will comply with all relevant statutory requirements. All appropriate licences or consents will be obtained prior to commencing works.

In the event of any unanticipated ecological or archaeological discoveries works will cease immediately and inform the Project Manager. Protect the finds with fencing and Project Manager to notify the archaeologist/ecologist for advice. Works will not continue until further instruction from the Project Manager has been obtained.

Regular monitoring will be undertaken during the development to ensure impacts on ecology are minimised and operatives involved with work activities with potential to have significant ecological impacts will be provided with work briefings and Toolbox talks.

To ensure that the risk of infestation by pests or vermin is minimised, adequate arrangements for disposing

of food waste or other material attractive to pests will be implemented – enclosed skips and bins for any biodegradable waste only.

4.10 Archaeology:

A Written Scheme of Investigation (WSI) was prepared and approved for the wider South Molton Triangle development. A separate, specific WSI for the 40-46 Brook Street works is currently being undertaken by MOLA. Outcomes from this report will be recorded in this SEMP once it is completed.

Should any archaeological remains be encountered during the works, all activity in the affected area will cease immediately and the Client and Local Planning Authority will be notified. Works will not recommence until appropriate mitigation measures have been agreed and implemented in accordance with the approved WSI or any additional requirements of Westminster City Council.

4.11 Induction & Training:

The induction given to all site personnel shall include a general overview of site-specific environmental issues, as well as details of how these issues shall be managed.

This Site Environmental Management Plan (SEMP) will be available onsite, and a copy issued to subcontractors prior to commencement onsite. In addition to this plan being available, specific information will be communicated through the following means:

- Briefings by managers/supervisors and when necessary representatives from other departments.
- Bulletins and Alerts.
- Environmental toolbox talks.

An Environmental Notice Board will be displayed on site, which will contain the following information:

- Toureen Environmental Policy.
- Latest Environmental Alert.
- Site Environmental Response Plan.
- Site sensitive receptors.
- Identification of SHEQ REP on site.

Environmental toolbox talks relevant to site activities are to be conducted every month. The attendance and topic discussed are recorded and communicated back to management team.

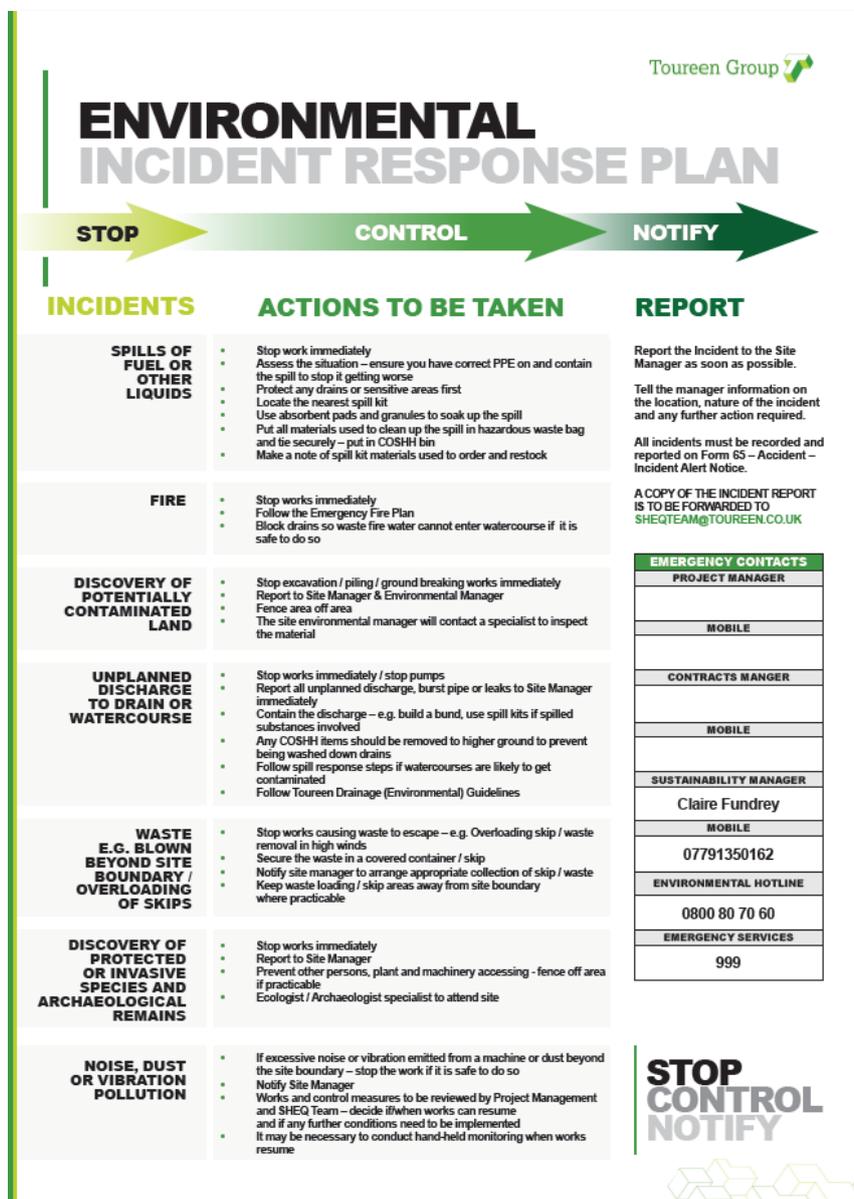
5 Environmental Incident Response Plan:

The Environmental Emergency Response Controls are set out to:

- Establish the emergency response management procedure for the project.
- Outline the controls for any uncontrolled spillages or unforeseen emissions or events.
- Ensure all project activities comply with applicable statutory Legislation, the Code of Construction Practice and client requirements.

All environmental incidents will be investigated at the earliest opportunity in order to identify the basic causes. Subcontractors will report any environmental incidents immediately to our Project Manager

The Project Environmental Incident Response Plan in Figure 15 outlines the actions to be taken in the event of an incident.



Toureen Group 

ENVIRONMENTAL INCIDENT RESPONSE PLAN

STOP
CONTROL
NOTIFY

INCIDENTS	ACTIONS TO BE TAKEN	REPORT
SPILLS OF FUEL OR OTHER LIQUIDS	<ul style="list-style-type: none"> • Stop work immediately • Assess the situation – ensure you have correct PPE on and contain the spill to stop it getting worse • Protect any drains or sensitive areas first • Locate the nearest spill kit • Use absorbent pads and granules to soak up the spill • Put all materials used to clean up the spill in hazardous waste bag and tie securely – put in COSHH bin • Make a note of spill kit materials used to order and restock 	<p>Report the Incident to the Site Manager as soon as possible.</p> <p>Tell the manager information on the location, nature of the incident and any further action required.</p> <p>All incidents must be recorded and reported on Form 65 – Accident – Incident Alert Notice.</p>
FIRE	<ul style="list-style-type: none"> • Stop works immediately • Follow the Emergency Fire Plan • Block drains so waste fire water cannot enter watercourse if it is safe to do so 	<p>A COPY OF THE INCIDENT REPORT IS TO BE FORWARDED TO SHEQTEAM@TOUREEN.CO.UK</p>
DISCOVERY OF POTENTIALLY CONTAMINATED LAND	<ul style="list-style-type: none"> • Stop excavation / piling / ground breaking works immediately • Report to Site Manager & Environmental Manager • Fence area off area • The site environmental manager will contact a specialist to inspect the material 	
UNPLANNED DISCHARGE TO DRAIN OR WATERCOURSE	<ul style="list-style-type: none"> • Stop works immediately / stop pumps • Report all unplanned discharge, burst pipe or leaks to Site Manager immediately • Contain the discharge – e.g. build a bund, use spill kits if spilled substances involved • Any COSHH items should be removed to higher ground to prevent being washed down drains • Follow spill response steps if watercourses are likely to get contaminated • Follow Toureen Drainage (Environmental) Guidelines 	
WASTE E.G. BLOWN BEYOND SITE BOUNDARY / OVERLOADING OF SKIPS	<ul style="list-style-type: none"> • Stop works causing waste to escape – e.g. Overloading skip / waste removal in high winds • Secure the waste in a covered container / skip • Notify site manager to arrange appropriate collection of skip / waste • Keep waste loading / skip areas away from site boundary where practicable 	
DISCOVERY OF PROTECTED OR INVASIVE SPECIES AND ARCHAEOLOGICAL REMAINS	<ul style="list-style-type: none"> • Stop works immediately • Report to Site Manager • Prevent other persons, plant and machinery accessing - fence off area if practicable • Ecologist / Archaeologist specialist to attend site 	
NOISE, DUST OR VIBRATION POLLUTION	<ul style="list-style-type: none"> • If excessive noise or vibration emitted from a machine or dust beyond the site boundary – stop the work if it is safe to do so • Notify Site Manager • Works and control measures to be reviewed by Project Management and SHEQ Team – decide if/when works can resume and if any further conditions need to be implemented • It may be necessary to conduct hand-held monitoring when works resume 	

EMERGENCY CONTACTS

PROJECT MANAGER
MOBILE
CONTRACTS MANGER
MOBILE
SUSTAINABILITY MANAGER
Claire Fundrey
MOBILE
07791350162
ENVIRONMENTAL HOTLINE
0800 80 70 60
EMERGENCY SERVICES
999

STOP
CONTROL
NOTIFY



Figure 15 – Site Environmental Incident Response Plan.

5.1 Definitions of Environmental Incidents:

For the purpose of implementing the SEMP the following definitions apply.

5.1.1 Minor / Incident:

An event, including near misses that has negligible or minimal impact to the environment. For example: an uncontrolled and unexpected release of a substance with the potential to pollute air, land, and water resources but that can be contained and mitigated against using on-site equipment and personnel; disturbance to non-protected species / area.

5.1.2 Intermediate / Incident:

An accident where the effects of the event cannot be controlled without assistance from external bodies, e.g., discharge of large volume of silt, oil and fire water to river or large spillages of hazardous materials and is reportable to enforcing bodies (Environment Agency).

5.1.3 Major / Incident:

A major accident may attract the interest of local press or environmental regulators, i.e., Environment Agency, Local Authority, Natural heritage, etc. It could have an adverse effect on the company name or a major financial impact.

Contact details for key site and emergency response personnel with responsibilities relating to the protection of the environment will be kept and publicised in key locations on site.

Key contacts will include:

NOTE – Also refer to section 2.7 for internal / project contacts.

Contacts	Phone
External Contacts	
Local Police	101
Emergency Services	999
Environment Agency Incident Hotline	0370 850 6506
Thames Water	0800 316 9800
Emergency Electricity UKPN	0800 316 3105
National Gas Emergency Service	0800 111 999
Westminster Council - Switchboard	020 7641 6000

5.2 Control Measures and Reporting:

When an incident is able to be controlled by facilities on site, and no intervention is required from a third party or a statutory authority, controls should be implemented, the incident cleaned up and reported in the site diary. All incidents are recorded.

All environmental incidents, dangerous occurrences or near misses will be reported to the Environmental team on **Form 65 – Accident / Incident Alert Notice** and recorded on **Form EF 01 Environmental Incident Report**. Once an incident is reported and recorded, actions will be identified to avoid a recurrence, and the site procedures will be updated accordingly.

Where an environmental incident occurs that has been dealt with in a manner which follows best practice and poses no further threat to the environment, an entry is made in the environmental incident log to record the issue. The environmental Non-Conformance/Incident Log will also be used to identify any trends in environmental incidents.

Where an uncontrolled incident is classed as an emergency or a major incident, the Environmental / SHEP Manager will investigate the root causes, communication systems and issue a “lessons learnt” memo to the workforce concerned in addition to any NCRs that may have been raised.

All accidents / incidents, dangerous occurrences and near misses will be reviewed by the Environmental Manager and, where necessary, changes to working practices/procedures will be implemented.

5.3 Outline Pollution Control Measures:

5.3.1 Storage of Oils, Paints & COSHH:

Oil drums, paints and COSHH materials must be stored in bunded storage areas with the following requirements:

- 110% capacity to hold contents of single drum or 125% of multiple drums
- Securely located in an area to prevent vandalism and accidental impacts from vehicles and plant
- Situated away from drains and watercourses.
- Spill kits located in close proximity to material storage and clearly marked. All spillages must be contained and cleared as soon as possible.
- Bunded areas frequently maintained
- Secondary containers (e.g. oil cans) are to be labelled clearly and kept on appropriate bund or plant nappy when on site and locked away when not in use.

5.3.2 Fuel / Oil Refuelling:

Control of refuelling operations is important as the risk of spilling fuel is at its greatest during the refuelling of plant.

- Mobile plant should be refuelled in a designated area and preferably on an impermeable surface away from drains and watercourses where practicable.
- Delivery valves should never be jammed open, and no vehicles are to be left unattended during refuelling.
- Hoses and valves must be checked regularly, turned off and locked away when not in use.
- Drip trays should be used to collect any minor spillages from equipment such as valves. The drip trays should be regularly checked, and oil disposed of.

During filling and delivery of fuel a supervisor shall be present to ensure the tank has sufficient capacity to hold the quantity, the correct fluid is used, spill kits are available, and any spillages or leaks are contained and cleared as soon as possible.

All bunds must be checked, maintained, and cleaned regularly taking appropriate measures as contents may be Hazardous Waste.

5.3.3 Plant and Machinery:

All plant machinery will be inspected daily and maintained in accordance with applicable procedure.

- Leakage or damage must be reported to the Site Manager in the first instance and actions to repair initiated
- All fixed plant (e.g. generators) will be appropriately bunded at all times
- Where possible, biodegradable hydraulic oil should be used for all plant
- Washing of plant should be carried out in designated areas only.

5.3.4 Silt:

Silt can be produced on sites from rainwater action on uncovered areas, pumping out and dewatering excavations, tunnelling operations and cleaning of drains or ditches.

Silt can cause pollution so management and mitigation measures will be put in place to prevent any impacts arising, as follows:

- Management of water entering and leaving site will be managed by the thorough planning of all earthworks operations.
- Minimisation/mitigation measures should be considered at all stages of work.
- Silty water is not permitted to be pumped into watercourses or surface water. Once cleaned of silt and contaminants, permission for discharge into a sewer must be obtained.

5.3.5 Bentonite, Cement, Concrete & Grout:

Liquid bentonite and cement are highly polluting, with the potential to cause harm to watercourses, drains and biota. To minimise risk:

- Containers must be kept closed and secure to prevent any entering the environment.
- Store materials at least 10 metres away from watercourses, gullies, and drains.

- Concrete washout to be carried out in designated areas only and wash water to be treated or otherwise disposed of correctly.
- Surface water drains should never be used for washing down bentonite, concrete or cement spills.

5.3.6 Site Drainage:

Obtain consent from local water company before discharging to storm or foul sewers. Monitor discharges in accordance with requirements of consent. Visually inspect discharge quality and take remedial action, as necessary.

Water settlement facilities to be provided where required – assess effectiveness of settlement facility and modify as required.

5.4 Site Pollution Plan

Figure 16 illustrates the locations of the fuel bowser, concrete pump, COSHH storage (bunded), waste skips and designated loading areas. The plan also identifies two surface water drainage points located on South Molton Lane near Davies Mews Courtyard, which will be protected throughout the works. Pollution prevention measures will be implemented at all times to minimise the risk of contamination to the drainage network and surrounding environment.

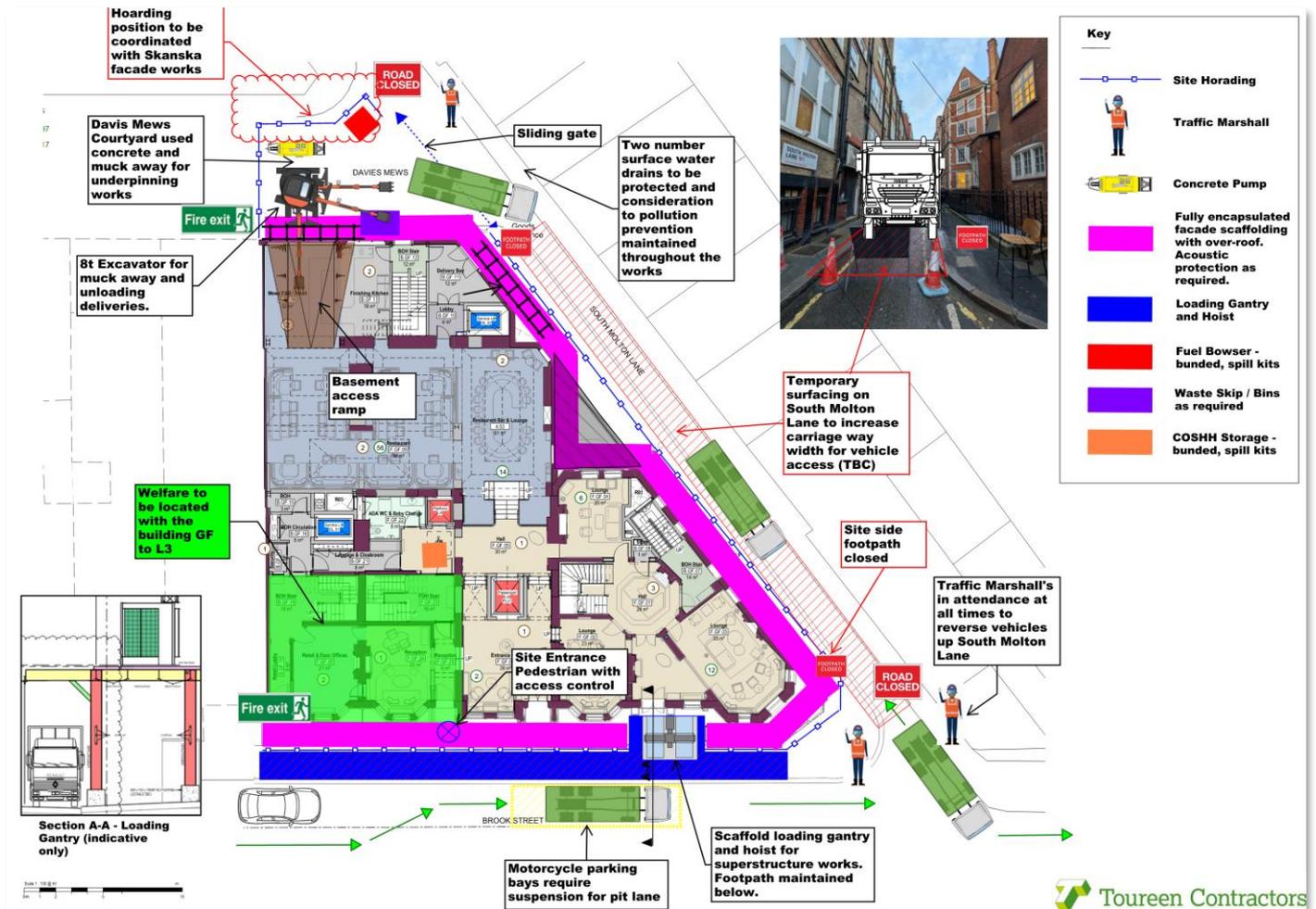


Figure 16 – Site Pollution Prevention Plan (Indicative)

6 Monitoring and Measuring:

6.1 Inspections and Audits:

The SHEP Team will carry out internal inspections and audits to establish compliance with all relevant environmental requirements. These may be supplemented by:

- Audits and inspections carried out by the client.
- Audits of sub-contractors.
- Third party or regulatory authority audits of ourselves or our subcontractors including those carried out for quality system certification purposes.

Audits will be carried out in accordance with EMS ISO 14001: 2015.

A copy of the SHEP Audit and Inspection Reports shall be issued to the Project Manager for action. The Project Manager shall be responsible for ensuring, by review, that such items have been addressed.

Any non-conformances or deviations from procedures identified during audits will be tracked and evaluated to identify any trends. These will allow to implement effective preventive measures as well as corrective measures.

6.2 Reporting:

The site will produce and communicate regular Monthly Environmental Reports which records the following Environmental Performance Indicators:

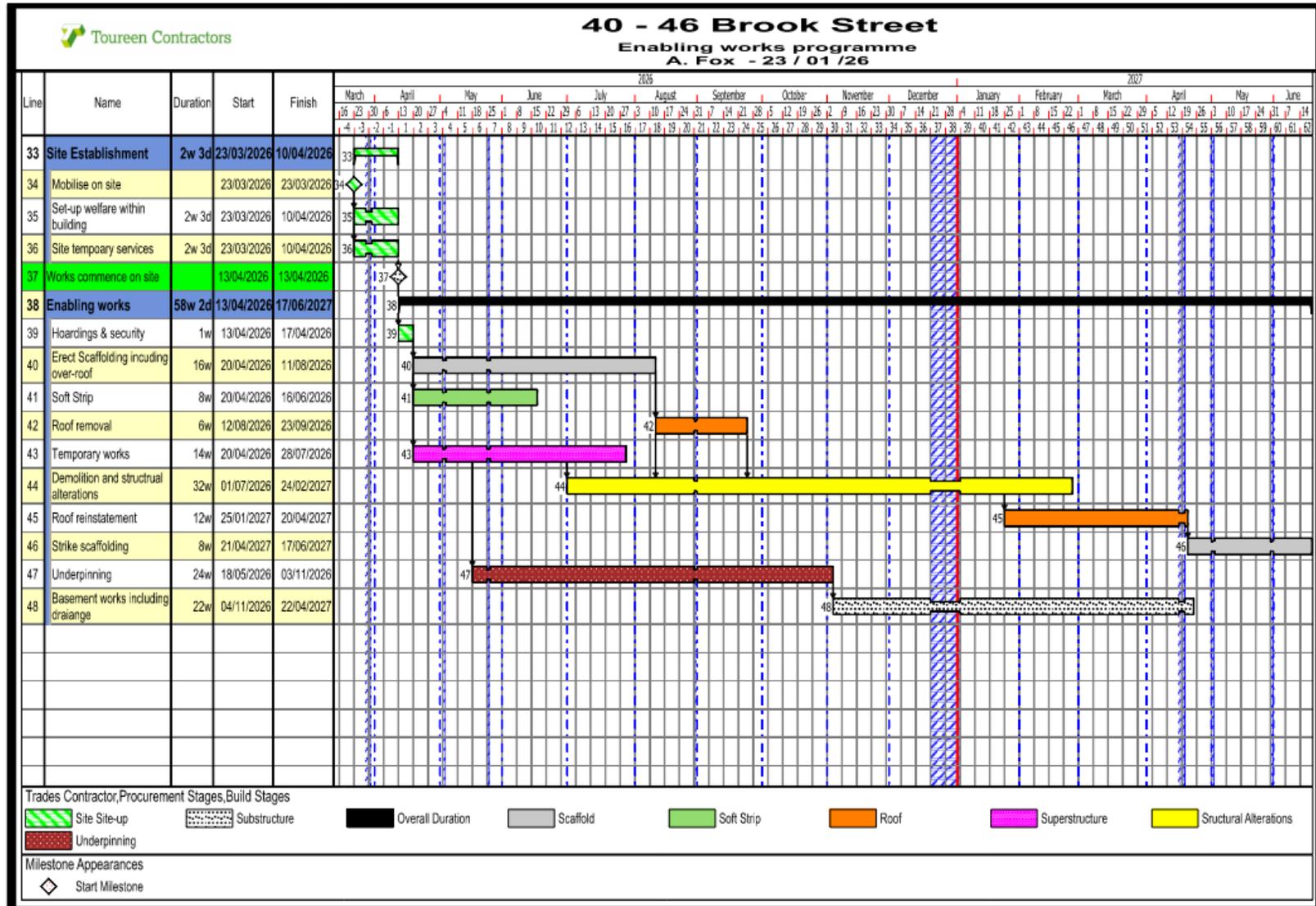
- Types and quantities of waste produced and recycled/re-used on/off site or removed from site.
- Hazardous waste.
- Material resource consumption (FSC certified timber, concrete, steel, aggregate etc).
- Diesel, electricity, LPG, and other fuel usage on site.
- Water usage on site.
- Carbon footprint arising from site operations, vehicle movements and other site activities.
- Non-conformities from audits.

Reports will be submitted in line with client and project requirements.

To ensure these records are robust and system based, the project will be utilising the use of online weekly SharePoint Returns and Power BI Report software to report on Environmental KPI's.

8 Appendices

8.1 Appendix A - Programme of Works



8.2 Appendix B – Construction Logistics Plan (CLP)

The Construction Logistics Plan is provided on the following pages.

CONSTRUCTION LOGISTICS PLAN

Toureen Contractors Limited
40-46 Brook Street
London, W1K 5DB



This Construction Logistics Plan

	Name	Position	Signature	Date
Prepared By	Matt Gifford (CLOCS CLP Advanced Practitioner)	SHEP Manager	<i>Matt Gifford</i>	27.01.2026
Reviewed By	Claire Fundrey	Environmental Manager	<i>Clarie Fundrey</i>	02.02.2026
Approved By	Andy Fox	Contracts Director	<i>Andy Fox</i>	02.02.2026

Construction Logistics Plan Template Amendment Record

Amendment No.	Description	Approved by	Date
Rev A	Document Created	M Gifford	02/02/26
Rev B	Templated updated in line with CLOCS guidance	M Gifford	03/02/26

Revision Log

Site amendments to the contents of this Construction Logistics Plan (CLP) are to be recorded below. This CLP must be reviewed / checked whenever a project change takes place.

Site-Specific Amendments

Amendment No.	Description	Revised By	Approved By	Date
Rev0	Issued for internal comments	M Gifford	NA	27.01.2026
Rev1	Updated following internal review	M Gifford	A Fox	02.02.2026
Rev2	Site Logistics plan updated	A Fox	M Gifford	05.02.2026
Rev3	Vehicle routes updated following site visit	M Gifford	A Fox	06.02.2026

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Supporting documents:

Supporting documents will be issued as required. Supporting documents will be updated as required throughout the project.

- CLOCS CLP Planning Tool.
- Site Environmental Management Plan (SEMP).
- Construction Phase Plan (CPP).

Note: This Project Construction Logistics Plan can only be drafted by a competent senior Toureen Group Manager who has full knowledge of the project and an understanding of the works to be undertaken. On completion, it will be forwarded to the relevant Director / Contracts Manager / SHEQ team for review and approval before commencement of works and where required, submission to local authority.

There are two types of CLPs that may be required. An Outline CLP accompanies the planning application and gives the planning authority an overview of the expected logistics activity during the construction programme. A Detailed CLP is submitted to a planning authority at the post-granted discharge of conditions stage and provides the planning authority with the detail of the logistics activity expected during the construction programme. **This document is a Detailed CLP’.**

1. Introduction:

This 'Detailed' Construction Logistics Plan (CLP) has been prepared in respect of the site at 40-46 Brook Street, Mayfair in the London Borough of Westminster, for the comprehensive redevelopment of the site.

Planning application reference: 22/04610/FULL

Toureen Contractors Limited has been appointed as the preferred contractor to deliver the enabling works to the 40-46 Brook Street phase and is programmed to commence works in April 2026, subject to the discharge of pre-commencement planning conditions.

This document has been written following review of the below documents:

- South Molten Triangle Indicative Construction Management Plan.
- Pre Construction Information documentation provided on SharePoint.

1.1. CLP Objectives:

The overall objectives of this detailed CLP are to:

- Lower emissions.
- Enhance safety.
- Reduce congestion.

The minimisation of disruption to and impact on both current highway traffic and pedestrians use of roads and immediate footways around the site is of major concern together with health and safety issues in relation to pedestrian, traffic, and plant movement on site along with how plant and pedestrian segregation can be implemented safely.

It is a Toureen Group policy to maintain high standards of Traffic Management during all aspects of work.

The aim of providing this plan is to evaluate all hazards within the activities of the project and to formulate a specific detailed CLP. When considering the risk of an accident caused by a vehicle on site, especially one that may be reversing, the consequences can be severe. Toureen Group have therefore set standards within the company which shall be met by all operational sites.

Meeting those standards will ensure the necessary levels of protection to the site workers, visitors, member of the public and surrounding buildings and area.

Our SHEQ team will provide advice and assistance on traffic management and construction traffic matters and to those involved in the works and carry out a monitoring role to ensure compliance with the requirements of this Construction Logistics Plan.

The purpose of this CLP is to consider initially, at the planning stage and then throughout the duration of the project, the arrangements for the management and safety of road users (particularly pedestrians and cyclists), mobile plant and vehicles.

To support these objectives, the below measures are to be implemented as part of this CLP.

- Designated vehicular access routes and site entrances.
- Designated pedestrian access routes and site entrances.
- External pit lane.
- Site boundary demarcation & site security.
- Vehicular / pedestrian demarcation barriers.
- Traffic route crossover points for site and public pedestrian traffic.
- Key signage placements.
- Providing a travel plan to allow workers to use public transport to attend site.
- Encouraging the use of greener vehicles.
- Encouraging the most efficient use of construction freight vehicles.

1.2. Site Context:

This CLP has been designed to reflect the demolition, and construction works at 40-46 Brook Street

The building is part of the South Molten Triangle development and is currently being utilised as office space. It comprises of 5 no existing properties which have been historically linked one office building.

The proposed development is to provide a 33-bedroom boutique hotel by refurbishment of the existing building to a hotel, including increasing the depth of the basement and addition of new areas of roof structure to form additional space

The site is surrounded on 3 sides by public roads, Brook Street to the South, South Molten lane to the East and Davies Mews to the North.

The site shares its west boundary with No.48 Brook Street, which is a new RC structure currently under construction as part of the South Molten Triangle Development. This is referred to as the South Block.

To the East, the structures front onto Molten Street South and generally comprise 3-4 storey terraces. To the South, on the opposite side of Brook Street, the structures include a 11-story hotel and 5-storey structure, both grade II listed.

The site is situated within the Mayfair Conservation Area. The surrounding area comprises a mix of commercial, retail, hotel and office uses, with high pedestrian activity throughout the day. The information presented is based on site context during a previous phase of the overall development and will be reviewed and updated as required to reflect current site conditions and neighbouring occupancies.

1.3. Development Proposal:

The overall development includes the conversion of the existing offices into a new hotel. The primary structural interventions which are proposed to be undertaken as part of this refurbishment are listed below.

- Underpinning of the existing masonry walls and lowering of the lower ground floor to form a deeper basement.
- Insertion of new lift shafts and vertical risers.
- Lowering the ground floor of No.42 Brook Street to align with the ground floor in the link structure and Davies Mews.
- Internal alterations, particularly related to the removal of load bearing walls within No.40 Brook Street.
- Amendments to the roof over No.42 to No.46 Brook Street to improve headroom and form plant decks between the ridges.
- Construction of new link structure between the front terraces and Davies Mews.
- Reconstruction and rationalisation of internal floors within Davies Mews.
- Reinstatement of below ground drainage networks at lower level.

The contents of this document considers the demolition and construction stage of the proposed works only. Therefore, a revised CLP document will be provided which will set out the relevant traffic management measures to be employed for the fit out and finishing phase of the works on site.

1.4. CLP Structure:

This CLP is divided into the following chapters:

1. Introduction.
2. Context, Considerations and Challenges.
3. Construction Programme and Methodology.
4. Vehicle Routing and Access.
5. Strategies to Reduce Impacts.
6. Estimated Vehicle Movements.
7. Implementing, Monitoring and Updating.

2. Context, Considerations and Challenges:

This section describes the local context and issues identified that need to be considered and addressed during construction.

2.1. Policy Context:

This section of the CLP references policies we have considered in the preparation of this document.

National Planning Policy Framework (NPPF): The NPPF promotes the use of sustainable transport throughout the UK, safe road design, and the efficient and sustainable delivery of goods and supplies. The NPPF sets out the long-term strategy for sustainable development.

Traffic Management Act (2004): Part 2 of the Traffic Management Act sets out the responsibility of local authorities to manage traffic networks within their geographical area of responsibility. This includes efficient use of the network and the requirement to take measures to avoid contributing to traffic congestion.

Local Planning Authority Policy: Local authorities have a statutory responsibility to minimise disruption to nearby residents and the local economy during the construction stage of a development. This is captured in a range of statutory requirements and best practice guidance, some of which apply to the planning process. An element of these requirements includes producing CLPs as part of a suite of plans designed to ensure sustainable development. **City of Westminster Code of Construction Practice** - This Code of Construction Practice covers the full range of impacts that construction work has on the local environment and residents. It sets out what the Council expects from developers and those involved in construction activities across the City. The expectation is that all construction sites meet the requirements or best practice set out in the Code, reducing disruption for those who live, work and visit our City.

Opportunity Area Planning Framework (OAPF): CLPs can be effective at significantly reducing construction transport movements in and around OAPF developments as they can cover multiple sites and should be considered as part of the OAPF process. **The Mayor of London – The London Plan** - <https://www.london.gov.uk/programmes-strategies/planning/london-plan/london-plan-2021>

Highways Act: The Highways Act 1980 is an Act of the Parliament of the United Kingdom dealing with the management and operation of the road network in England and Wales. It is the Act which most of the activities pertaining to CLPs utilise.

Fleet Operator Recognition Scheme (FORS): FORS is a unique, industry led, membership scheme to help fleet operators become safer, more efficient and more environmentally friendly.

- Toureen is currently certified with FORS Fleet Operator Recognition Scheme Logo with ID Number: 002249.

- Toureen is currently certified as FORS Gold accreditation.

Direct Vision Standard and HGV Safety Permit Scheme: You need to obtain a safety permit before operating a heavy goods vehicle (HGV) in most of Greater London. Otherwise, you may receive a Penalty Charge Notice (PCN). You now need to install the Progressive Safe System for zero, one and two star-rated HGVs.

Vision Zero: An approach to road danger reduction that works towards the elimination of road traffic, deaths and serious injuries by reducing the dominance of motor vehicles on our streets.

2.2. Context Maps:

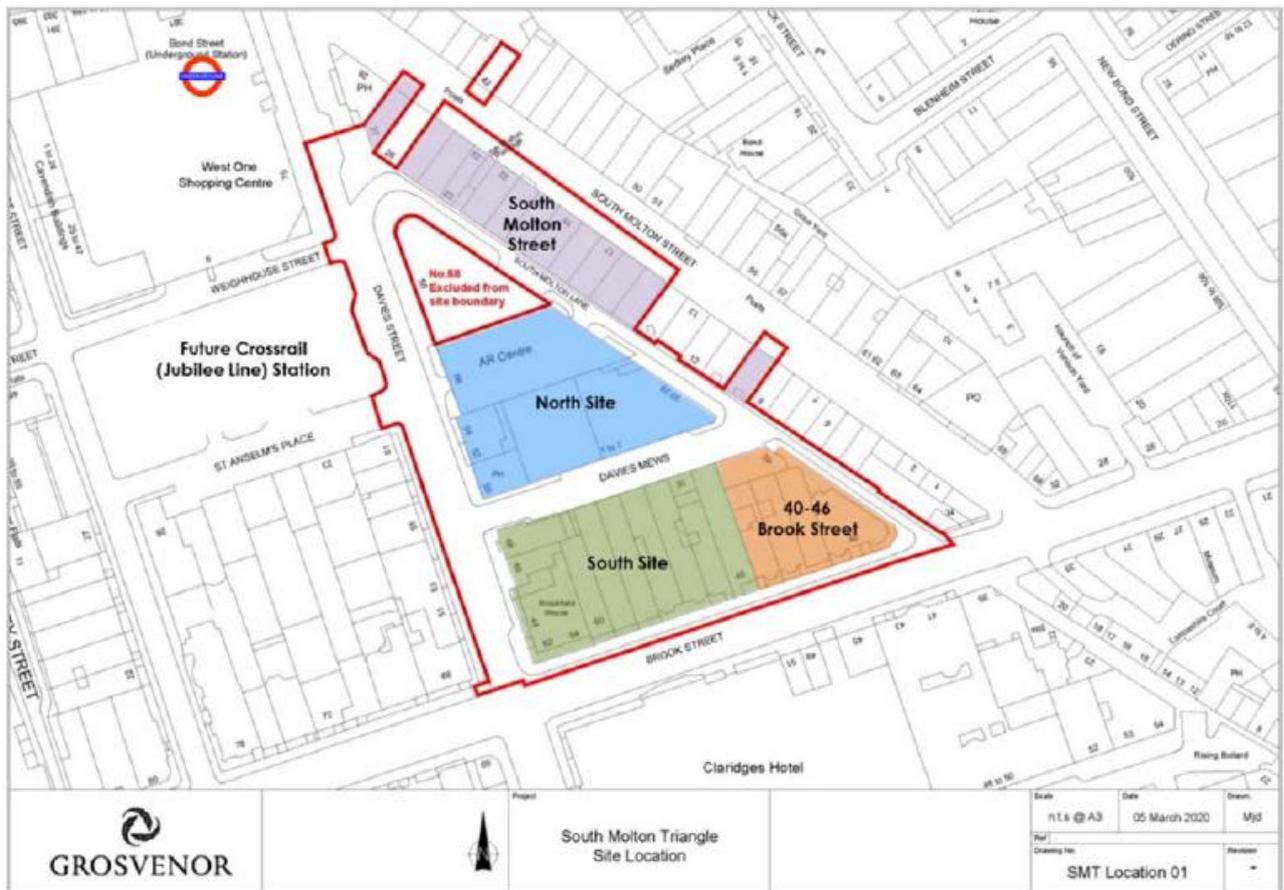


Figure 1: Grosvenor – South Molten Triangle Development Boundary.

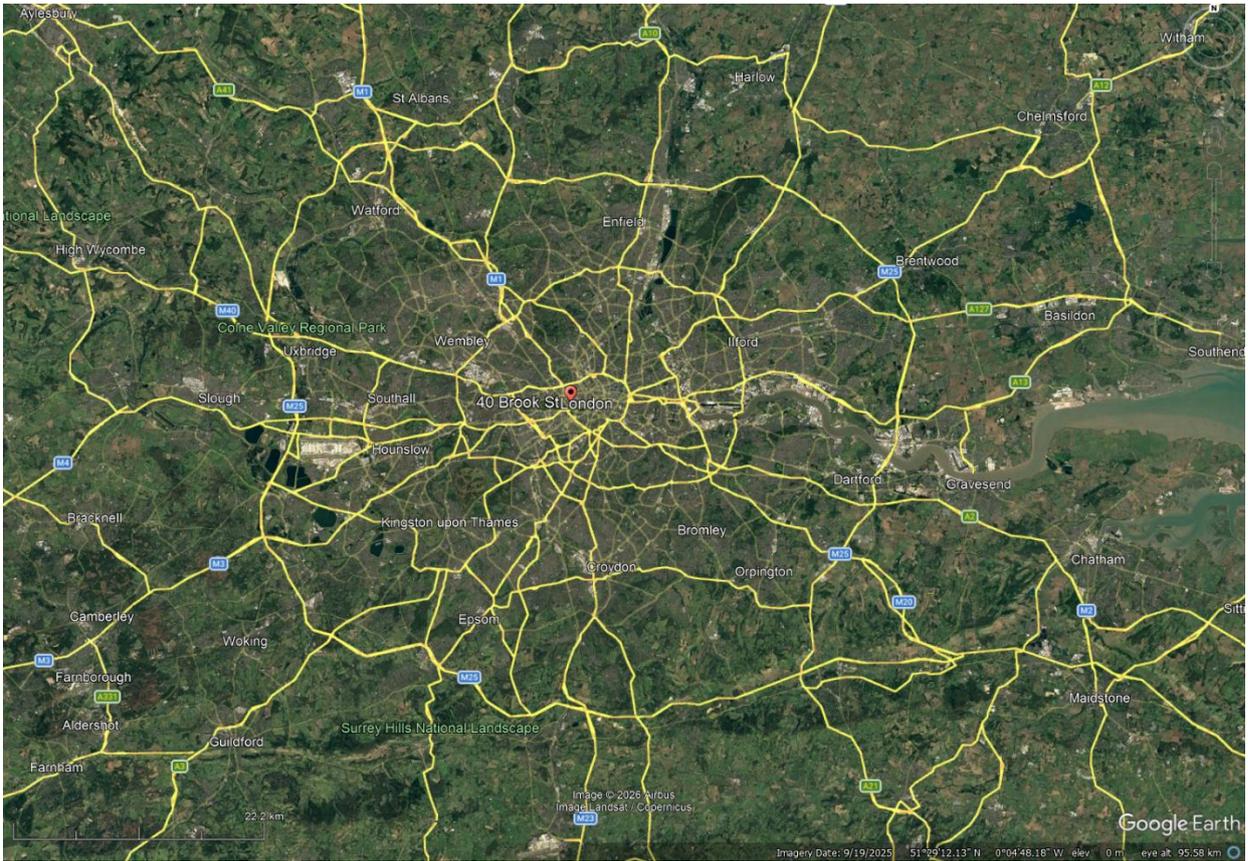


Figure 2: Google Earth – Zoomed out location (refer to scale).



Figure 3: Google Earth – Zoomed in location (refer to scale).

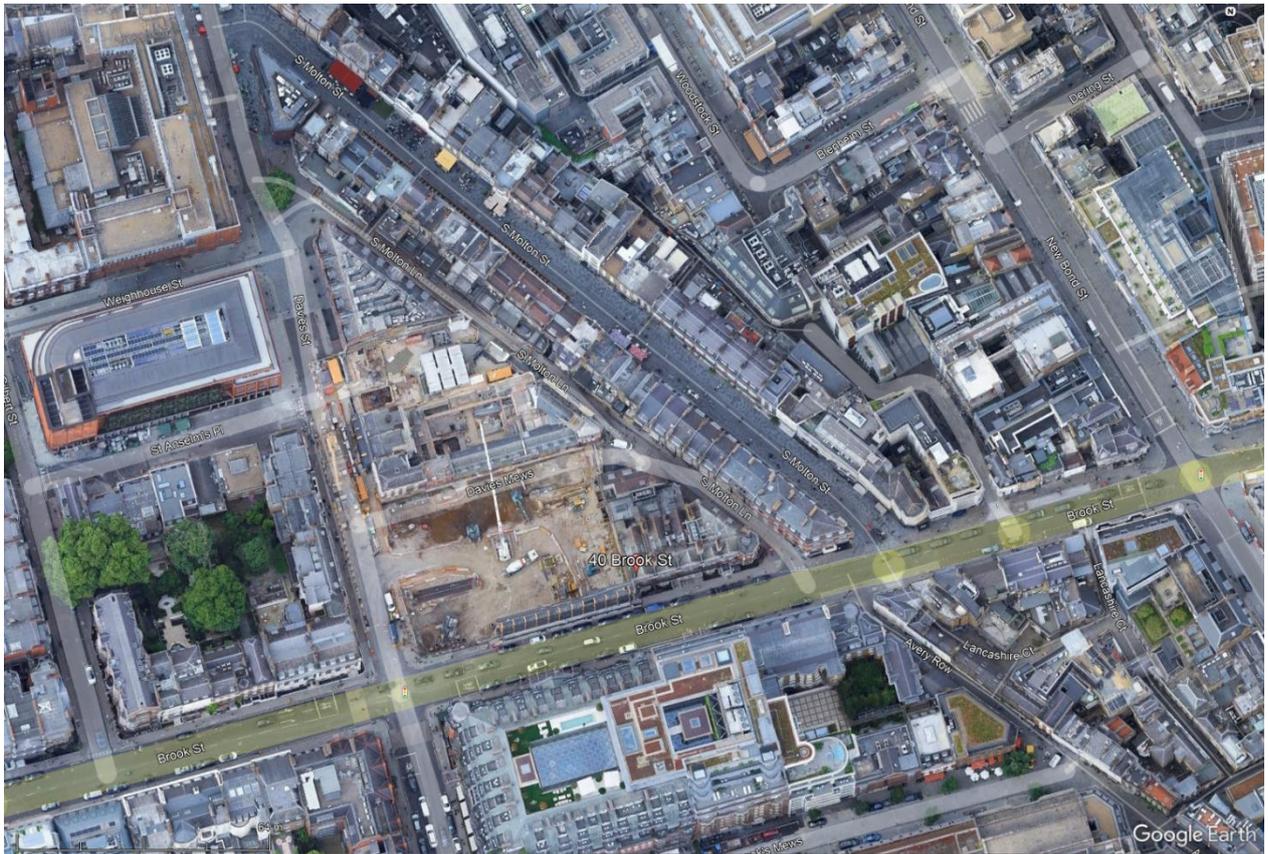


Figure 4: Google Earth – Zoomed in location (refer to scale).

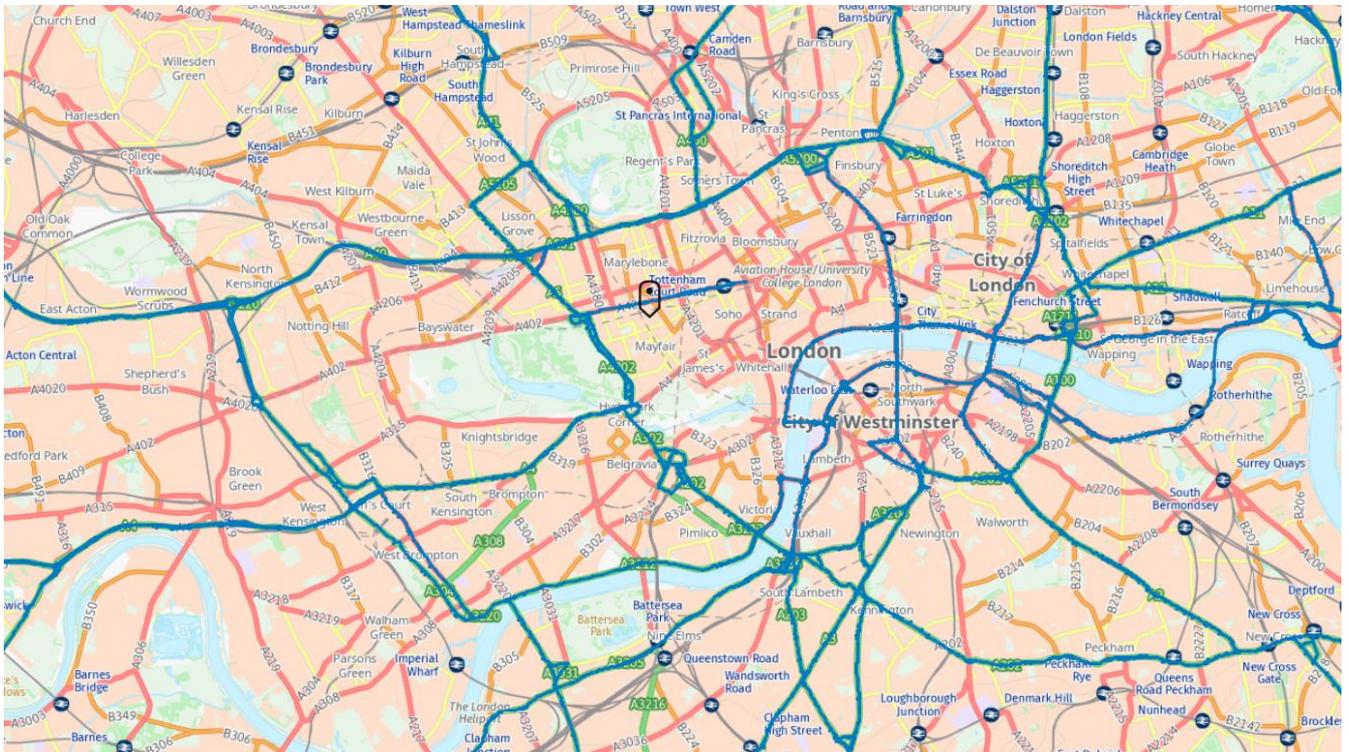


Figure 5: Site Location in Relation to TLRN (zoomed out).

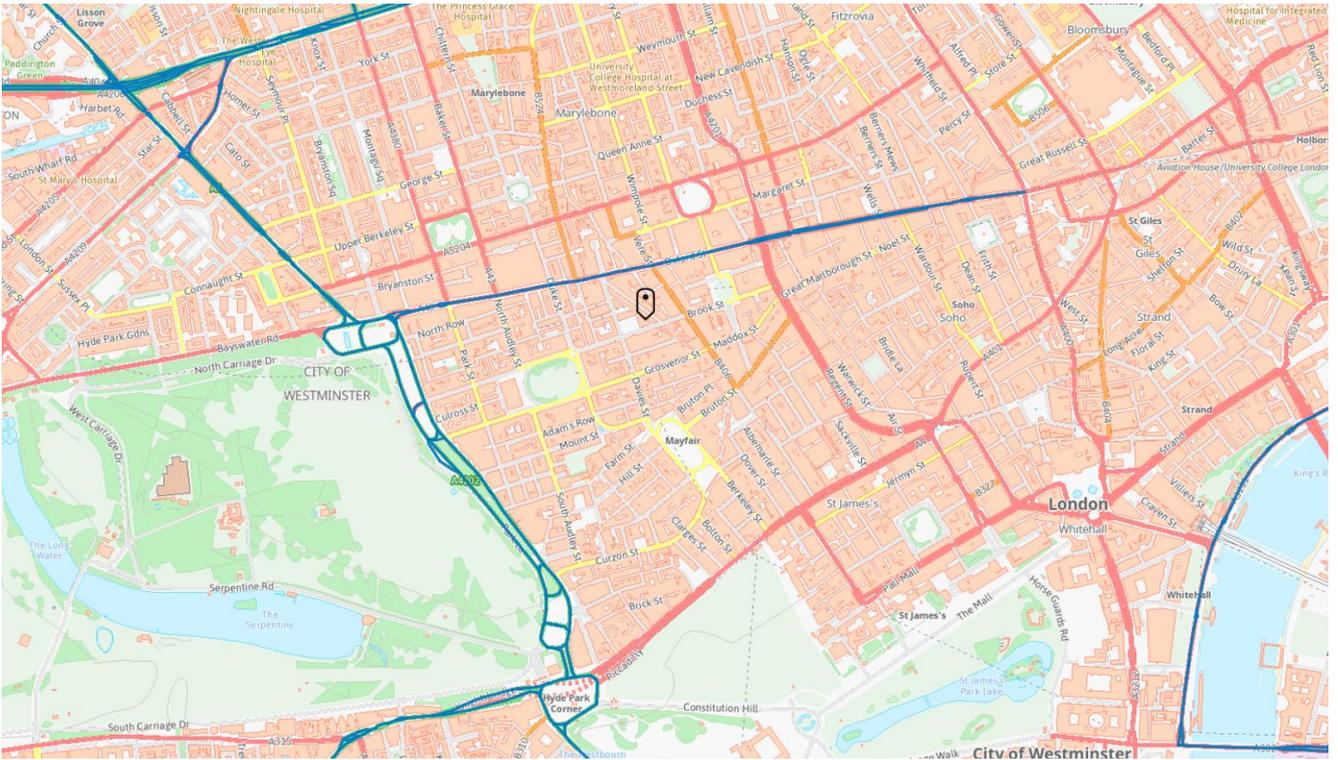


Figure 6: Site Location in Relation to TLRN (zoomed in).

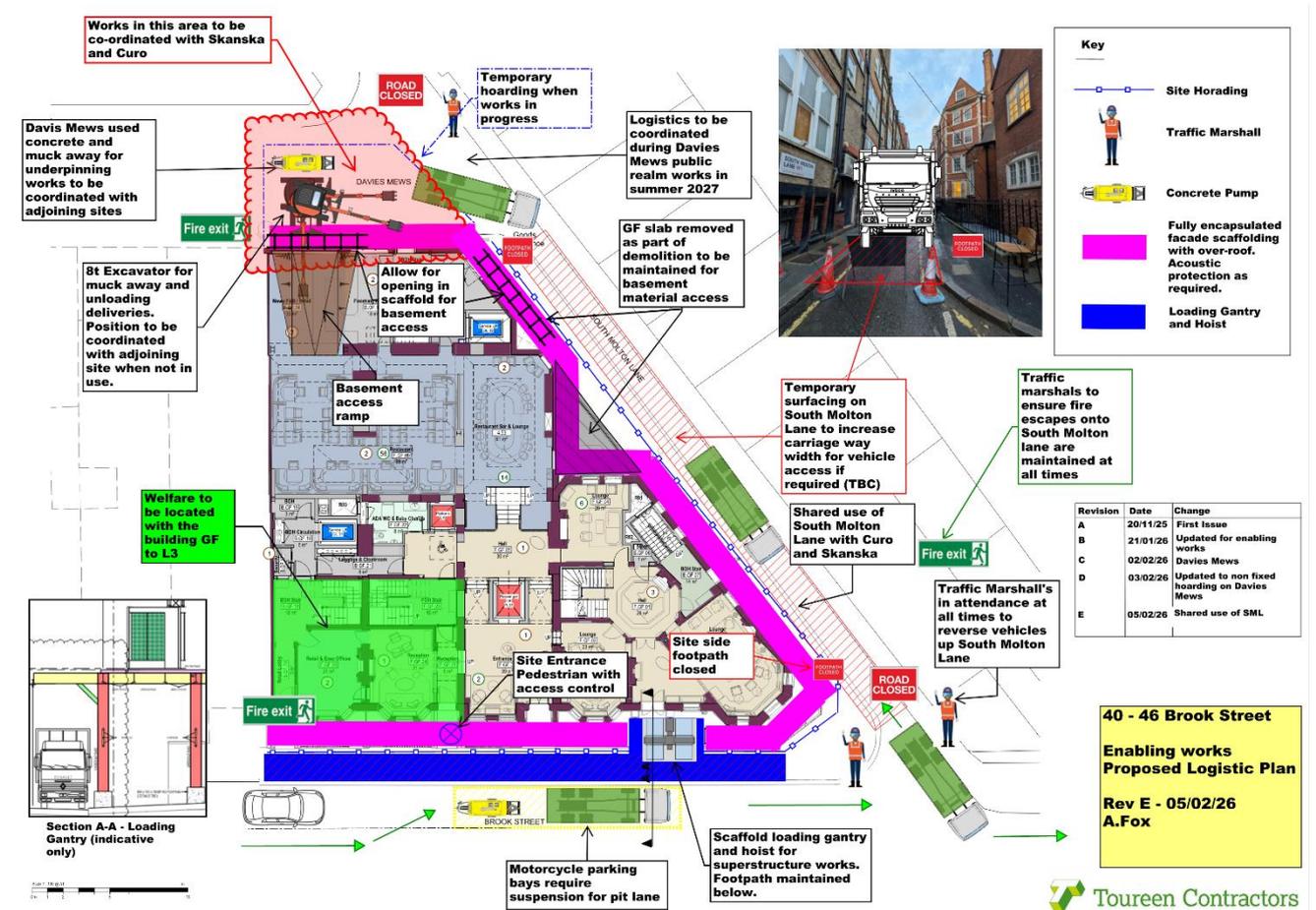


Figure 7: Site Logistics Plan.

2.3. Local Access:

2.3.1. Highways, Carriageways and Footways:

The site is surrounded on 3 sides by public roads, Brook Street to the South, South Molten lane to the East and Davies Mews to the North. All public roads have pavements to either side.

Davies Mews is currently fully closed and not accessible for vehicles or pedestrians as part of the South Molten Triangle Development.

South Molten Lane is currently closed for public vehicle access as part of the South Molten Triangle Development.

We propose: (with reference to Figure 8 – Site Logistics Plan).

- Davies Mews: Utilise existing road closure for the site compound at the end of Davies Mews.
- South Molten Lane: Utilise existing road closure for site access and egress and to hold vehicles. This closure and the area within will be managed by Curo with shared access provided to Toureen. Note this route must still provide access to neighbouring buildings and sites.
- South Molten Lane: Pavement closure along the elevation of the site. Diversion in place to direct pedestrians along the pavement on the other side of the road. Pavement segregated by vehicle barriers to provide segregation.
- South Molten Lane: Temporary adaption to road level to allow vehicles adequate width to manoeuvre.
- Brook Street: Pitlane to be installed in area of current motorcycle bays. The current motorcycle bays will require suspension.
- Brook Street: Temporary pavement closures may be required to facilitate hoarding and scaffold installation. This temporary closure and diversion will be managed by the Toureen Logistics Team. The scaffold gantry installation once constructed will provided a protected tunnel for pedestrian passage.

The above proposals will be managed by Toureen and will be installed / carried out following approval from Westminster City Council. Drop kerbs / ramps will be installed as required.

To provide protection to the general public during operational hours, all gates will be managed by the Traffic Marshal team. When gates are not in use they will be closed and locked. During vehicle movements, expandable barriers will be used by the TMs to provide adequate segregation of vehicles and the general public. TMs will be mindful of the needs of vulnerable highway users, these will include wheelchair users, the elderly, people with walking difficulties, young children, people with prams, blind and partially sighted people, etc. The adjoining public road will be kept clean and free from obstructions.

Existing public highway and pathways are already sufficiently illuminated. Lights will be installed on site hoardings, as well as internal works areas and vehicle routes where required

A specific plan will be developed prior to any oversize vehicle accessing the site. Details of the oversize vehicle will be supplied to all relevant parties in advance. It is not currently planned to have any oversize vehicles attend site. If required, these will be subject to an individual Temporary Traffic Order which will be submitted to WCC for approval prior to being undertaken.

Road Closures to include Partial Closures will be dealt with through Westminster Highways Department where we shall provide sufficient notice for any planned closures. The pavement closure required will be notified to WCC under a temporary structures licence.

2.3.2. Railways, Underground, Bus and Coach:

Information on public transport routes will be displayed on site to inform personnel of available options of options available. These will be promoted, and personnel will be strongly discouraged from bringing personal vehicles into the local area, also noting that no parking is available on site.

Bond Street station which is served by the Elizabeth Line, Central and Jubilee Lines is located approximately 0.1 miles Northwest of the Site so within easy walking distance.

Oxford Circus station which is served by the Bakerloo, Central and Victoria Lines is approx. 8-minute walk, and Green Park station which is served by the Jubilee, Picadilly and Victoria Lines is approx. 15-minute walk. The Elizabeth Line and tube network provide good connection to main line stations for travel to further destinations.

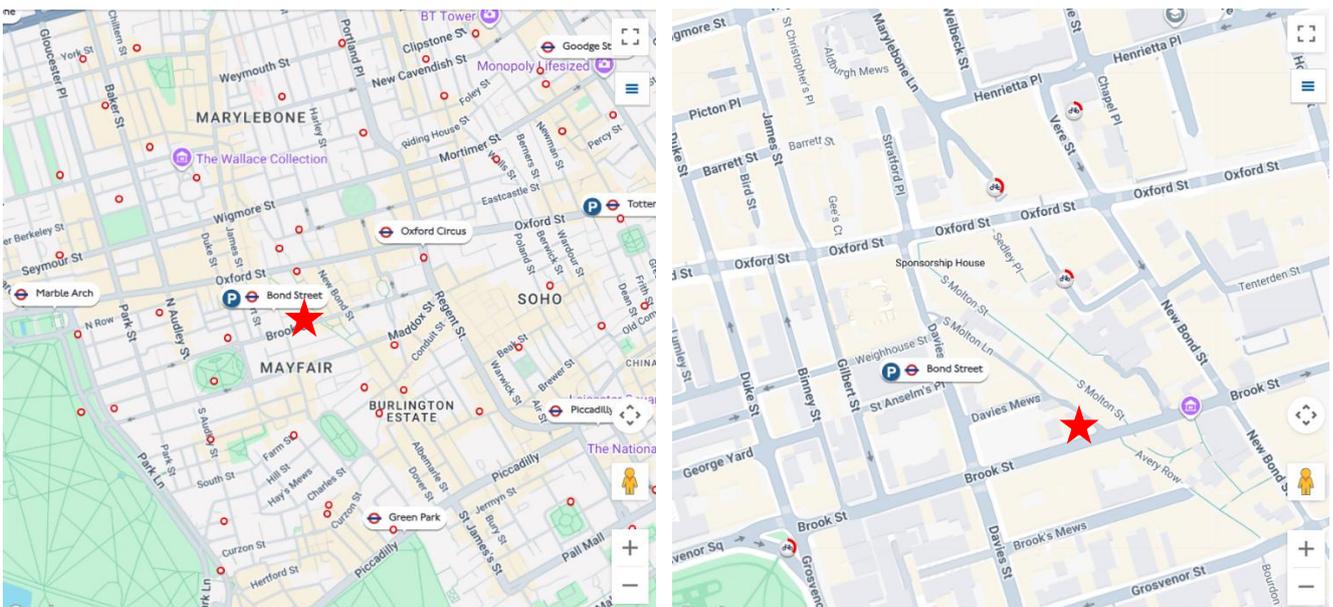


Figure 8: TFL map showing station locations (site shown by red star).

Tube Links can be found here: <https://tfl.gov.uk/maps/track/tube>

The Site is well served by London Buses being within walking distance of numerous services in the AM and PM Peak hours to many destinations.

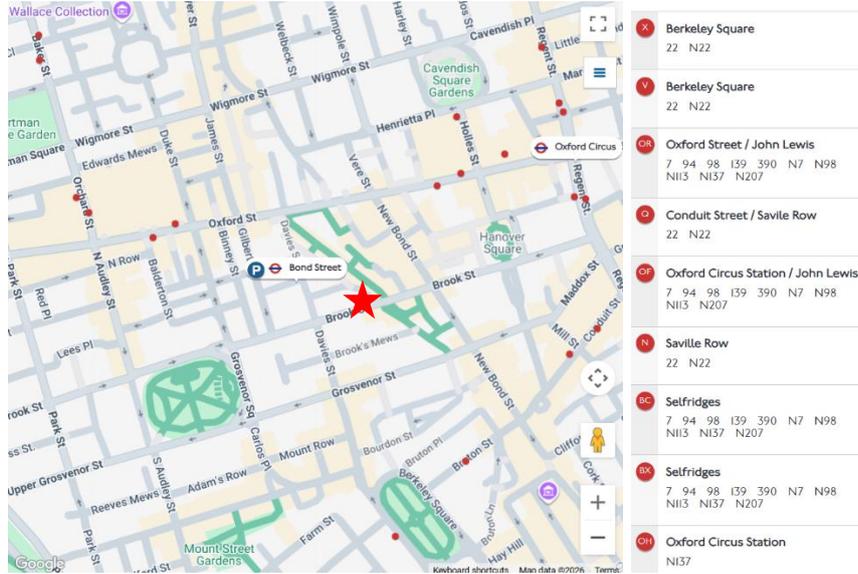


Figure 9: TFL map showing bus stop locations (site shown by red star).

Bus Links can be found here: <https://tfl.gov.uk/modes/buses/>

Our works will have any adverse impact on these transportation links and the links available provide adequate means for persons travelling to and from site.

2.3.3. Cycling:

Cyclists attending site:

Personnel attending site by bicycle will have cycle storage provided internally on site in a designated cycle store. This will be accessible via the site pedestrian gate. Personnel cycling to work are to dismount on arrival at the gate. Cycle to work initiatives will be promoted on site.

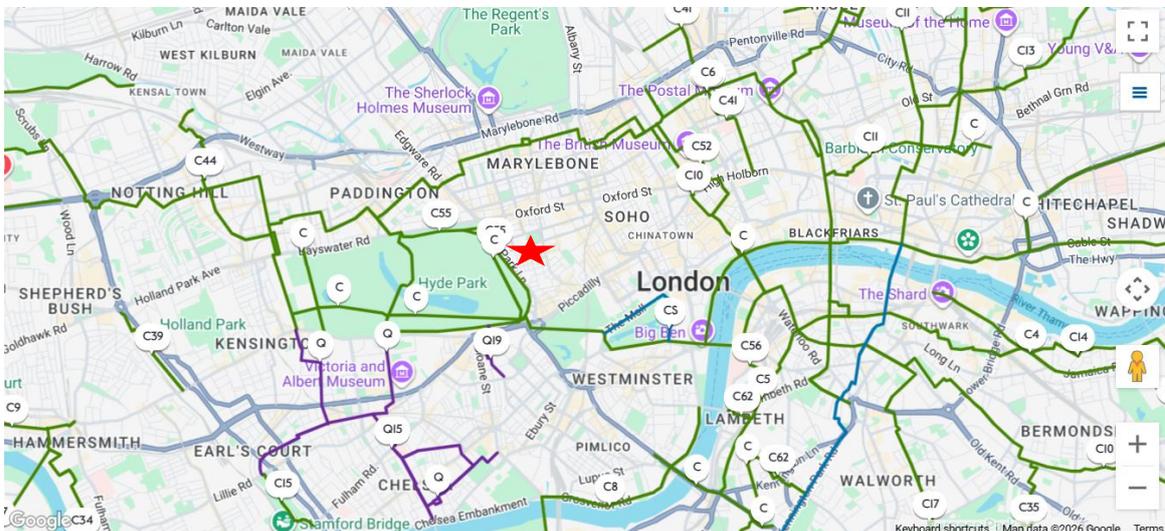


Figure 10: TFL cycle routes (site location shown by red star).

Link: <https://tfl.gov.uk/modes/cycling/routes-and-maps>

Link: <https://santandercycles.tfl.gov.uk/map>

Protection of general public cyclists: All goods vehicles attending site will be compliant with the FORS scheme and be fitted with the required cyclist protection measures. TMs will ensure that prior to any vehicle movements that due care is given to any passing cyclists.

2.3.4. Waterways:

There are no TFL Riverboat services within walking distance of the site, however it can be used in conjunction with the tube and bus networks as part of the journey to and from site.

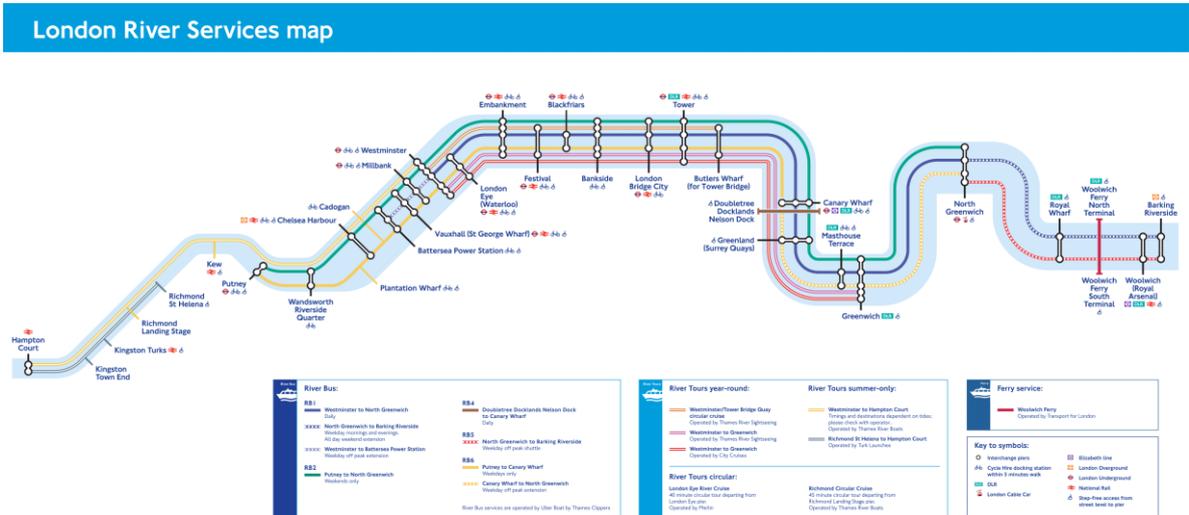


Figure 11: TFL London River Services Map.

2.4. Community Considerations:

2.4.1. Local Policy:

City of Westminster Code of Construction Practice - This Code of Construction Practice covers the full range of impacts that construction work has on the local environment and residents. It sets out what the Council expects from developers and those involved in construction activities across the City. This code of practice will be abided by at all times.

2.4.2. General:

Works should be contained within the site boundary and pit lane throughout and while loading / unloading will be arranged so to minimise the impact of construction vehicles on the free flow of the local highway network.

Site Contact Details will be displayed on the Site Hoarding and any complaints received will be reviewed and where necessary will be formally documented and included in the CLP Review.

To prevent undue compromise to traffic using the roads in and around the project, placement, and management of the main aspects of Plant, Equipment and Materials have been set out alongside the likely frequency of traffic movement events associated with them. The management of these movements has been developed into basic plans within this document to show how this will be dealt with by the site management team, utilising Traffic Marshals, Banksman / Gateman.

Any dirty machinery equipment and vehicles will be cleaned prior to leaving the site, this includes wheel washing facilities (jetwash) at the vehicle exit of the site. If during the contract period mud or debris is identified on the public highway operatives will immediately remove the mud and debris using brooms and shovels / jet wash, if these methods are not effective a road sweeper will be employed to undertake the removal of the mud and debris.

- Timber Hoarding will be erected all around site. Any hoarding once erected that may have impact on vision for vehicles will need to be adjusted to suit.
- Gateman will remain on gates at all times while gates are open.
- Traffic Marshal will be recognised by orange hi-vis clothing that will be stamped with Traffic Marshal.
- 2-way radios will be used.
- Drivers will be given a site induction card as they enter site if they are required to leave their cab.
- Road signage will be in place and checked on a regular basis to ensure correct positioning / placement, especially during windy conditions.

2.4.3. Schools / Hospitals:

There are no schools or hospitals in the immediate vicinity of the site.

2.4.4. Nearby Construction Sites:

The site forms part of the South Molten Triangle Development Scheme. Adjacent works to the northern and southern blocks are being undertaken by Skanska, who are currently progressing steel frame and in-situ concrete works, while works along South Molton Street are being carried out by Curo Construction and are programmed for completion in summer 2026. The respective boundaries of works are shown on Figure 12.

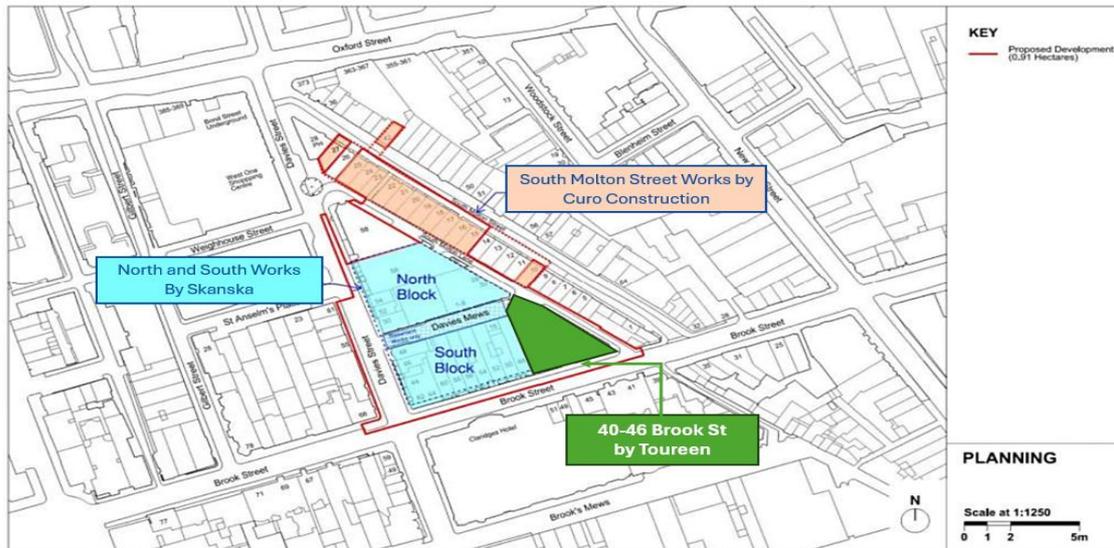


Figure 12: South Molton Triangle Development

Close liaison with these sites will be maintained. The Toureen Logistics Manager will liaise with these sites for the duration of our works. Close liaison will be required over the shared use of South Molten Lane.

2.4.5. Other Key Receptors Affected by the Works:

The area has a mixture of residential, hotel, retail and commercial offices. Brook Street is a busy two-way street linking Grosvenor Square and Hanover Square.

There are a number of sensitive receptors in close proximity to the 40–46 Brook Street project. Immediately adjacent and nearby receptors include commercial properties along South Molton Street and Brook Street, including 39-41 Brook Street. Claridge’s Hotel is located to the southeast of the site and represents a particularly sensitive receptor due to its hotel use.

Further nearby receptors include retail and commercial premises along South Molton Lane, which runs to the east of the project. At ground level on the corner of Brook Street and South Molton Lane is Mr Fogg’s bar, which typically opens from 16:00 on most working days. Additional sensitive receptors include offices and the Bond Street Elizabeth Line Station within the wider South Molton Triangle area.

Pedestrian and vehicle movements should not have any additional adverse impacts on the above receptors considering the site in its current form with relation to the South Molten Triangle Development. Refer to the SEMP for controls and mitigation set out for construction methodology etc.

2.4.6. Public Relations:

Toureen will work with the Client’s team to maintain effective liaison with local stakeholders throughout the works. Engagement will align with the wider South Molton Triangle arrangements, including the Community Liaison Group, regular meetings, newsletters and project website <https://southmolton.co.uk/community/>

3. Construction Programme and Methodology:

- Works commence on site – 23rd March 2026.
- Completion of contracted works – June 2027.
- Anticipated Works Programme - Overall Duration approx. 64 weeks.

During construction phases, working hours are anticipated to be:

- Weekdays 8am – 6pm.
- Saturday 8am – 1pm when necessary, i.e. only during critical activities.
- Sunday and bank holidays – No construction activities.

These working hours will be adhered to, with no work to be undertaken outside of these hours, unless exceptional circumstances require otherwise, and prior approval in writing from the Council would be required.

These working hours will ensure that neighbours and local road users near to the Site will experience as little disruption in terms of noise, dust, and traffic movements as possible.

Construction phase	Start	End
Site setup and demolition	Mar-2026	Feb-2027
Basement excavation and piling	Apr-2026	Oct-2026
Sub-structure	Nov-2026	Apr-2027
Super-structure	Jan-2027	Jun-2027
Cladding	TBC	TBC
Fit-out, testing and commissioning	TBC	TBC

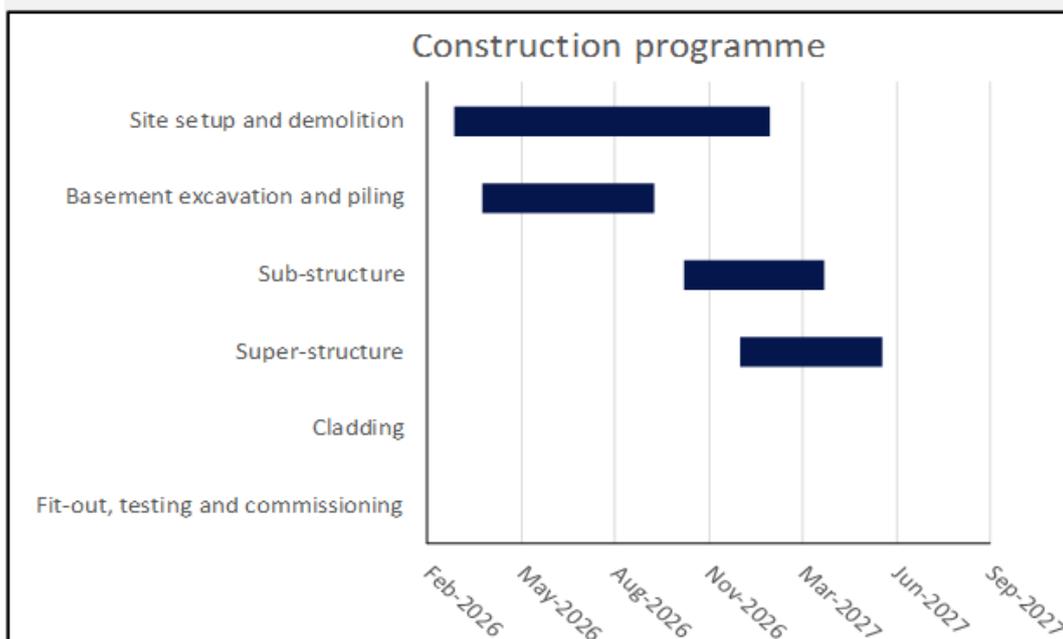


Figure 9: CLP Planning Tool – Programme Outputs.

2.5. Scope of Works and Programme Phases:

The proposed development is to provide a 33-bedroom boutique hotel by refurbishment of the existing building to a hotel, including increasing the depth of the basement and addition of new areas of roof structure to form additional space.

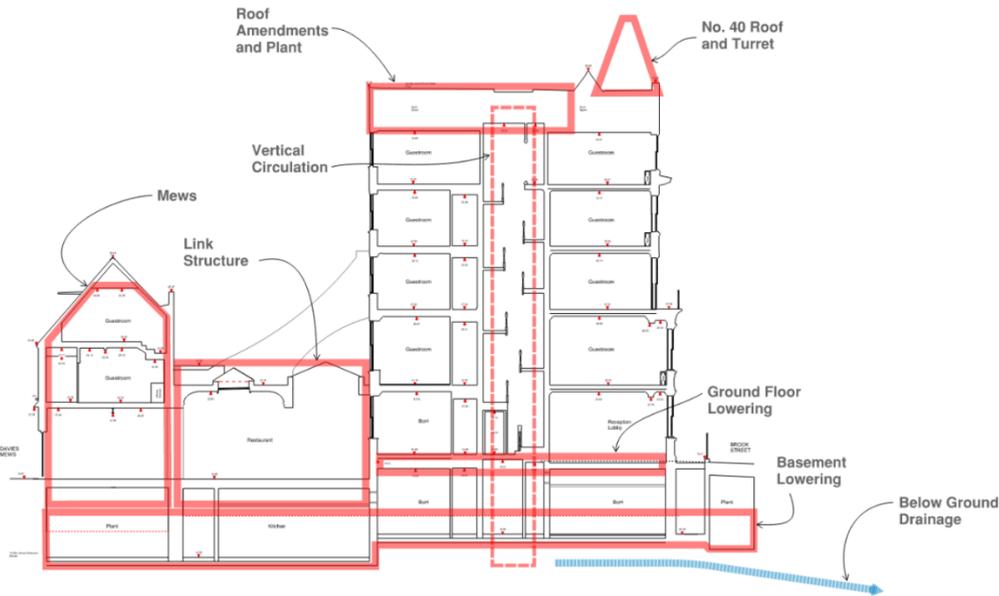


Figure 13: ElliottWood – Proposed Structural Works Sketch

The scope of the works for the project is as listed below:

The overall development comprises part demolition and excavation (including works beneath Davies Mews), the erection of new buildings, and the refurbishment and alteration of existing buildings across the Brook Street, Davies Street, South Molton Lane, South Molton Street and Davies Mews area, including redevelopment behind retained and partially reconstructed façades, selective dismantling and reinstatement of architectural features, and alterations to street-level elevations.

The scheme will deliver a mixed-use development of up to nine storeys comprising Class B1 (Business), Class A1 (Shops), Class A3 (Restaurants and Cafés), Class A4 (Drinking Establishments), a composite public house with guest accommodation (sui generis), Class C1 (Hotel), Class C3 (Residential), and community infrastructure uses, together with public realm enhancements, improved pedestrian routes, servicing, plant, storage, cycle parking and other associated works. The current application relates specifically to changes to the development phase at 40-46 Brook Street.

2.5.1. Site Set Up and Demolition:

- Site establishment – Welfare within the building , logistics, perimeter hoardings, and security. Site temporary services. Surveys and investigations.
- Installation of traffic management on South Molten Lane.

- Installation of a Pitlane on Brook Street.
- Installation of pedestrian management.
- Scaffold – Full perimeter encapsulated scaffold with over-roof. Loading gantry of Brook St including hoist for vertical distribution.
- Isolation / diversion of incoming services to facilitate the works.
- Soft strip – including protection of heritage items.
- Temporary works to support building during structural alterations.
- Structural alterations throughout, including removal of roof coverings, partial roof structure removal, formation of new core structures, structural openings and new structural slabs.

2.5.2. Basement Excavation and Piling:

- Temporary works to support building during structural alterations and underpinning.
- Underpinning to lower basement foundations.
- Excavation of basement to new formation level.

2.5.3. Sub-Structure:

- To include basement waterproofing system.
- New basement slab.
- Below slab drainage and sewer connections.

2.5.4. Super-Structure:

- New lift shafts and stair cores.
- Roof reinstatement.
- New structural steel plant floors.
- Gable ends, turret structure and rood coverings.

2.5.5. Cladding and Envelope:

Currently not part of Toureen contract works.

2.5.6. Fit Out, Testing and Commissioning:

Currently not part of Toureen contract works.

2.5.7. Vehicle Routing and Site Access:

Prior to commencing works, this CLP will be implemented which will allow vehicular access on to the site. Access for vehicles will be into the pit lane on Brook Street or via the vehicle gate on South Molten Lane. Vehicles shall be required to reverse down South Molten Lane under supervision of a competent

Banksman. This will allow the loading and removal of waste materials as well as the required loading and unloading to be undertaken within the site boundary and pit lane.

Vehicles Attending Site:

Option 1 – Vehicles will approach the Site from the TLRN (Transport for London Road Network), from the A4202 London Inner Ring Road, Park Lane, turning left into Upper Brook Street, onto Grosvenor Square and then onto Brook Street. From here, vehicles will either be positioned in the pit lane or reversed onto South Molten Lane to the site gate.



Figure 14: Map showing route to site from TLRN – Option 1.

Option 2 – Vehicles will approach the Site from the TLRN (Transport for London Road Network), from the A501 Marylebone Road, turning on to Baker Street, proceeding onto North Audley Street and left in onto Brook Street. From here, vehicles will either be positioned in the pit lane or reversed onto South Molten Lane to the site gate.

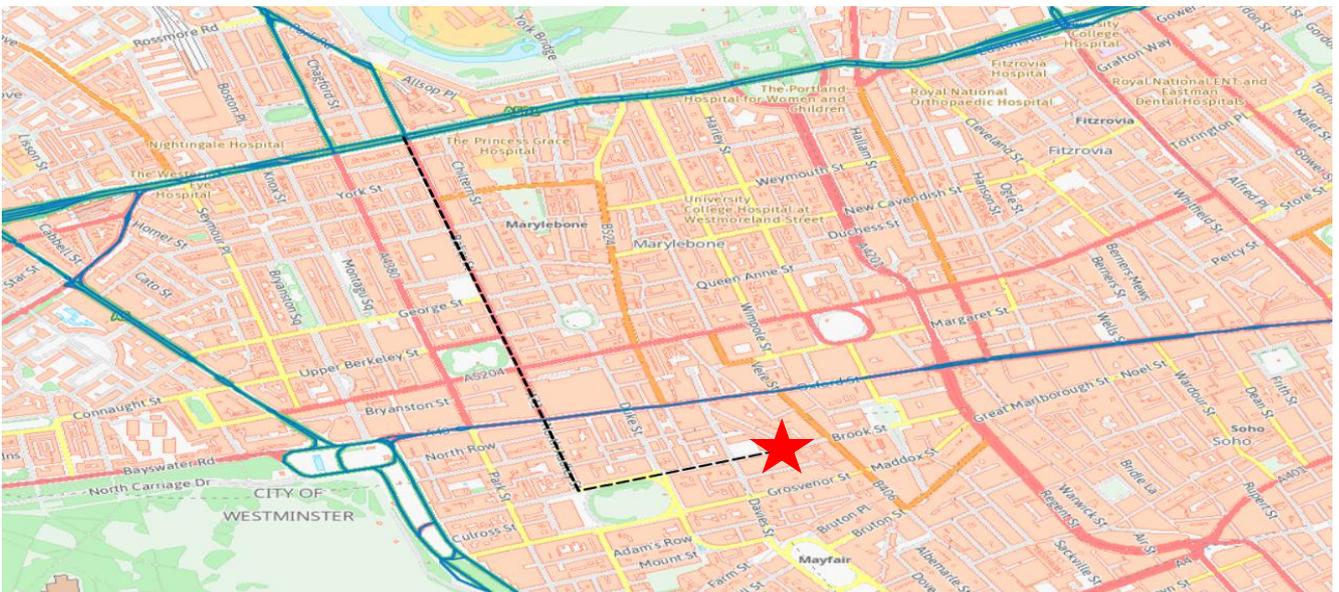


Figure 15: Map showing route to site from TLRN – Option 2.

Vehicles Leaving Site:

Option 1 – Driving forward out of South Molten Lane or the Pit Lane - On leaving the Site, construction vehicles will proceed from the pit lane / turn left out of South Molten Lane along Brook Street. Proceed to Regent Street and turn left. Proceed into Portland Lane and at Portland Crescent enter the A4202 London Inner Ring Road.

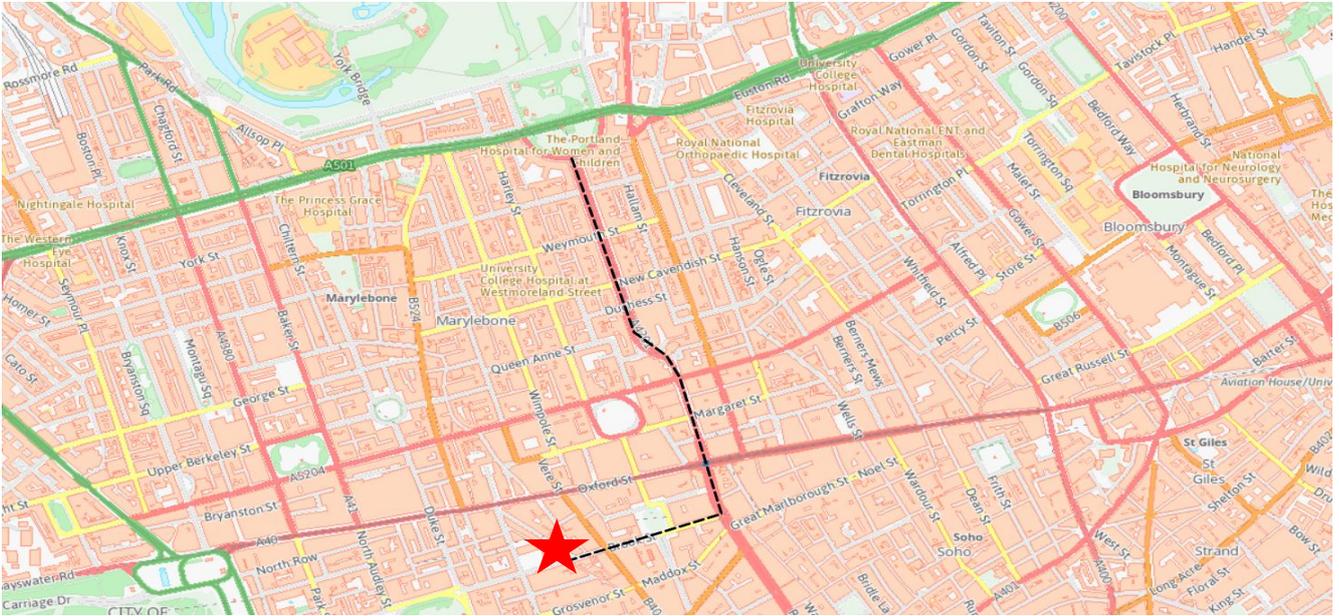


Figure 16: Map showing route to TLRN from site – Option 1.

Option 2 – Driving forward out of South Molten Lane only - On leaving the Site, construction vehicles will proceed from South Molten Lane turning right along Brook Street. Then turn Left into Davies Street and then right into Grosvenor Street. This leads into Upper Grosvenor Street. At the end of the road you reach the TLRN A4202 London Inner Ring Road, where vehicles can turn left to head south or right to head North / West.



Figure 17: Map showing route to site from TLRN – Option 2.

The below swept path analysis have been completed for rigid vehicles using South Molten Lane.

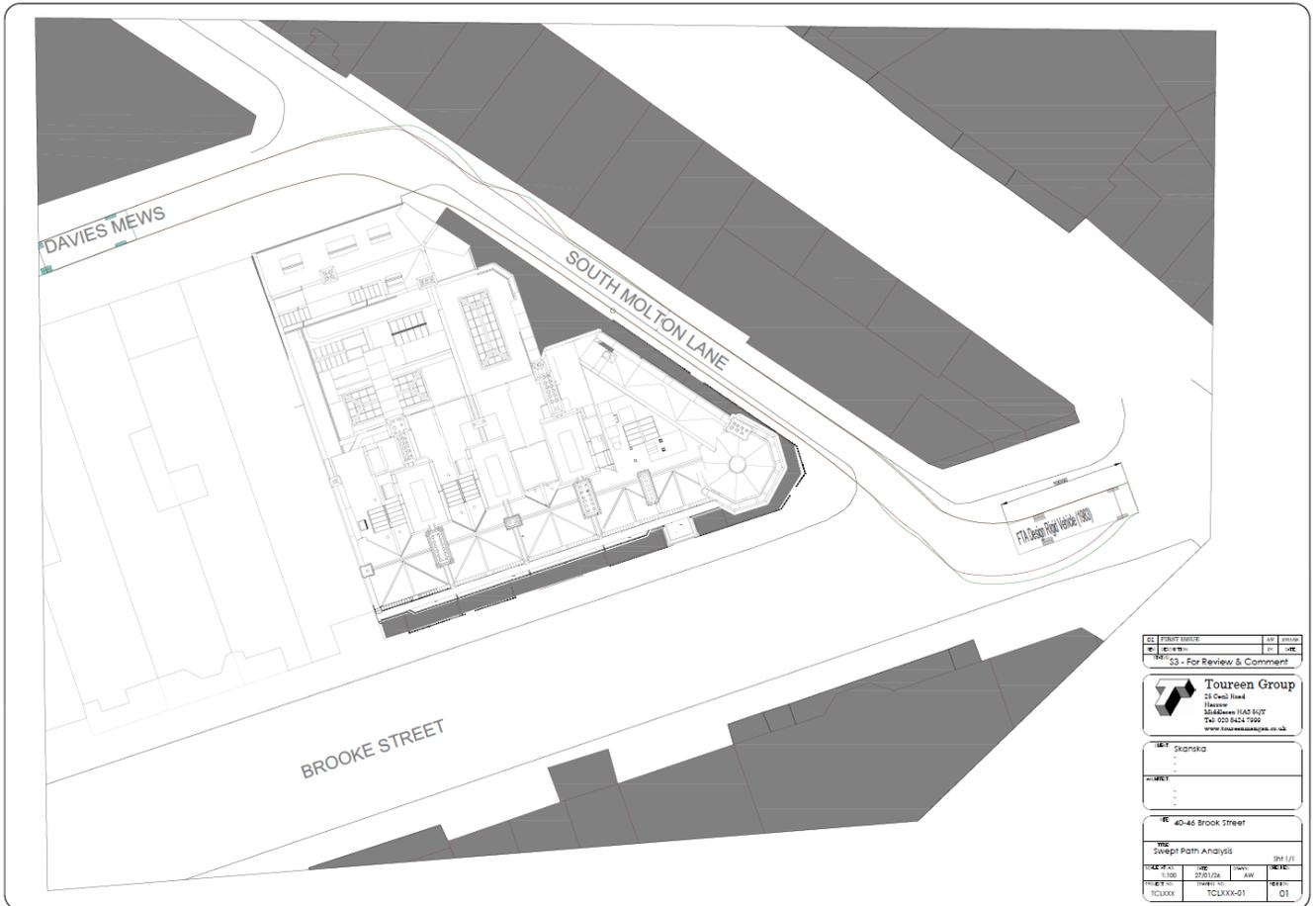


Figure 18: Swept Path Analysis (4 axle tipper), entering South Molten Lane.

At no point should a vehicle be permitted to obstruct the flow of traffic on surrounding roads, good communication in advance of vehicles attending site is imperative. Only designated on-street loading areas as identified on the plan will be utilised.

Any deliveries or collections that are required to be carried in the pit lane in Brook Street will be fully segregated with the red / white vehicle barriers to provide adequate segregation from other traffic users and the sufficient TM`s will be provided to coordinate road traffic and pedestrians

All deliveries and collection vehicles will be attended by a minimum of two TM`s at any one time. The TM`s will be present at the site prior to the scheduled construction vehicle arriving and will ensure the vehicle arrives and departs in a controlled and safe manner.

In the case of the public (pedestrians, cyclists, cars etc.) failing to take direction from our TM`s, we will immediately cease our movement, if it safer to do so, until they pass.

All the drivers must comply with Highway Code and take notice of all local on-street controls and requirements. Their engines will be switched off when stationary and will be courteous if required to move.

If another vehicle is currently in attendance, or access to the site is restricted, the attending vehicle will be instructed to not attend until access is clear. There are no holding areas allocated, we will request a “just in time” delivery and collection plan, this will ensure that local road traffic remains unrestricted at all times. Where possible, vehicle movements will be timed to avoid peak congestion in the local area.

Parking on site will not be permitted for general attendance. The use of public transport and cycling and walking to site will be promoted. Where required, for persons attending for maintenance purposes, parking may be facilitated to allow the works to be undertaken.

4. Strategies to Reduce Impacts:

Higher impact Site Planned Measures Checklist	Committed	Proposed	Considered
Measures influencing construction vehicles and deliveries			
Safety and environmental standards and programmes	X		
Adherence to designated routes	X		
Delivery scheduling	X		
Re-timing for out of peak deliveries		X	
Re-timing for out of hours deliveries			X
Use of holding areas and vehicle call off areas			X
Use of logistics and consolidation centres		X	
Vehicle choice		X	
Measures to encourage sustainable freight			
Freight by water*		X	
Freight by rail*		X	
Material procurement measures			
DfMA and offsite manufacture		X	
Re-use of material on site		X	
Smart procurement		X	
Other measures			
Collaboration with other sites in the area		X	
Implement a staff travel plan		X	

2.6. Measures Influencing Construction Vehicles and Deliveries:

2.6.1. Safety and Environmental Standards and Programmes:

We are committed to ensuring all contractor and sub-contractor vehicles arriving on site comply with both safety and environmental requirements.

We will require all vehicles attending site to be FORS registered and to hold FORS Silver accreditation. Good vehicles should comply with the Direct Vision Standard.

A collision reporting system will be mandated to ensure all RTCs involving project vehicles are reported to the Project Director and any relevant parties. The FORS Manager reporting tool will be used.

An anti-idling policy will be enforced while vehicles are in attendance on site.

2.6.2. Adherence to Designated Routes:

All suppliers and supply chain members will be provided with a copy of this CLP and will be required to comply with the designated vehicle routes set out. Compliance will be monitored by the appointed Logistics Manager and Logistics team.

2.6.3. Delivery Scheduling:

All deliveries and collections will be booked in advance with the Logistics Manager.

A schedule of deliveries for the week ahead will be prepared by the Logistics Manager. Each day the Traffic Marshals will be addressed by the Logistics Manager as to the known deliveries for the day and provided with a copy of the schedule of deliveries and briefed on the method of manoeuvre for the delivery to the site.

All booked vehicles will be given an allocated time and also the contact details of the TM. They will be issued the agreed logistical route prior to attending. Drivers are to call 10 mins in advance to advise of their arrival to ensure the designated time slot is still permissible. This will eliminate excess waiting time in the vicinity of the site and therefore eliminating site generated local congestion.

2.6.4. Re-timing for Out of Peak Deliveries:

Vehicle movements to and from site will be staggered at intervals throughout the full length of each day, this will increase efficiency on site and reduce increased vehicle movements during peak times.

2.6.5. Re-timing for Out of Hours Deliveries:

Not currently required, vehicle numbers are not currently excessive.

2.6.6. Use of Holding Areas and Vehicle Call Off Areas:

Not currently required, vehicle numbers are not currently excessive and vehicles to and from site will be scheduled.

2.6.7. Use of Logistics and Consolidation Centres:

To reduce vehicle movements to and from site, where possible, loads will be consolidated at our Plant Yard. This will also apply to collections from site which will be consolidated on site for collection to reduce vehicle movements within the local area. Toureen Plant yard is located at Hartspring Lane, Watford, WD25 8AQ

Deliveries will also be consolidated with those for other Toureen Group sites within the local area to further reduce vehicle movement in the local area where possible.

2.6.8. Vehicle Choice:

All suppliers of plant, materials and equipment are requested to provide suitably sized vehicles to facilitate the deliveries. All vehicles arriving to the site are expected to be certified SILVER standard in line with CLOCs requirements. All delivery vehicles and plant machinery on site should have flashing beacons in operation, where fitted, or turn on their hazard lights when entering site or pitlane.

2.7. Measures to Encourage Sustainable Freight:

2.7.1. Freight by water:

Although some supply chain members utilise water transportation methods to consolidation centres, final mile movements are not able to utilise the method.

2.7.2. Freight by Rail:

Although some supply chain members utilise rail transportation methods to consolidation centres, final mile movements are not able to utilise the method.

2.8. Material Procurement Measures:

2.8.1. DfMA and Offsite Manufacture:

The consideration for off-site manufacture will be proposed where possible for required construction materials, this is to include prefabricated RC sections. Roof sections etc. This will reduce the number of vehicles delivering to site.

2.8.2. Re-use of Material On Site:

Due to the scope of works, which is to demolish and remove the building, it is unlikely that many arising items on site will be able to be reused on this particular site and therefore require removal. However,

all waste materials removed from site are taken to Licensed Recycling Centres for further processing so that they can be recycled for use both on local construction sites and other industries. A waste recovery rate of between 90 and 95% is targeted by the recycling centres used. All waste removed will be recorded on the Site Waste Management Plan (SWMP). Please refer to the Site Environmental Management Plan (SEMP) for further information.

Temporary works components will be reused on a floor-by-floor basis. This will reduce the number of delivery and collection vehicles.

2.8.3. Smart Procurement:

All required items being procured are done so by the Toureen Group Buying or Plant Department. This allows the buyers and plant controllers to source the most suitable supplier and also linking deliveries and collections with our nearby sites to overall reduce vehicle movements in the local area where possible.

2.9. Other Measures:

2.9.1. Collaboration With Other Sites in the Area:

The site forms part of the South Molten Triangle Development Scheme. Adjacent works to the northern and southern blocks are being undertaken by Skanska, who are currently progressing steel frame and in-situ concrete works, while works along South Molton Street are being carried out by Curo Construction and are programmed for completion in summer 2026. Close liaison with these sites will be maintained. The Toureen Logistics Manager will liaise with these sites for the duration of our works. Close liaison will be required over the shared use of South Molten Lane.

2.9.2. Implement a Staff Travel Plan:

No parking will be provided on site. There are excellent nearby transport connections which will be relayed to all personnel attending site.

3. Estimated Vehicle Movements:

Vehicles identified for the delivery of Plant, Materials and Equipment to Toureen Group sites:

- Panel Vans (Light Deliveries).
- Large Panel Vans (Light Deliveries).
- 4 Axle Rigid HGV's (Deliveries of tools / Materials and Equipment – Deliveries of plant / skips).
- 2 Axle Rigid HGV's (Deliveries of tools / Materials and Equipment).
- Articulated vehicles (Deliveries of materials) – Brook Street Pit Lane only.

Plant items anticipated for delivery & use on site during the works include:

- Excavators (under 8t)

- Dumpers / Skidsteers (under 8t)
- Mobile cranes.
- Mini Piling Rig.
- Concrete Pump.

Equipment and Materials anticipated for delivery, use on site during the works include:

- Small tools.
- Site consumables.
- Site cabins and set up equipment.
- Waste skips.
- Scaffolding.
- Fuel bowsers.
- Gas oil.
- Temporary works falsework and formwork.
- Concrete.
- Timber.
- Rebar.
- Structural Steel.
- Infill materials.

The charts in this section are to be made using the construction logistics planning tool contained in the CLP Guidance. The following are outputs from the spreadsheet of the construction programme.

NO. OF VEHICLES IN PEAK PHASE (EX. OTHER PHASES)			
Construction phase	Period of stage	No. of trips (monthly)	Peak no. of trips (daily)
Site setup and demolition	Q1 2026 - Q1 2027	50	2
Basement excavation and piling	Q2 2026 - Q4 2026	128	5
Sub-structure	Q4 2026 - Q2 2027	48	2
Super-structure	Q1 2027 - Q2 2027	108	5
Cladding	#VALUE!	0	0
Fit-out, testing and commissioning	#VALUE!	0	0
Peak period of construction	Q2 2027 - Q2 2027	156	7

NO. OF VEHICLES IN PEAK PHASE (INC. POSSIBLE OVERLAP OF SUBSEQUENT PHASES)			
Construction phase	Period of stage	No. of trips (monthly)	Peak no. of trips (daily)
Site setup and demolition	Q1 2026 - Q1 2027	152	6
Basement excavation and piling	Q2 2026 - Q4 2026	152	6
Sub-structure	Q4 2026 - Q2 2027	156	7
Super-structure	Q1 2027 - Q2 2027	156	7
Cladding	#VALUE!	#VALUE!	#VALUE!
Fit-out, testing and commissioning	#VALUE!	#VALUE!	#VALUE!

Figure 19: Estimated Construction Vehicles – Monthly And Daily.

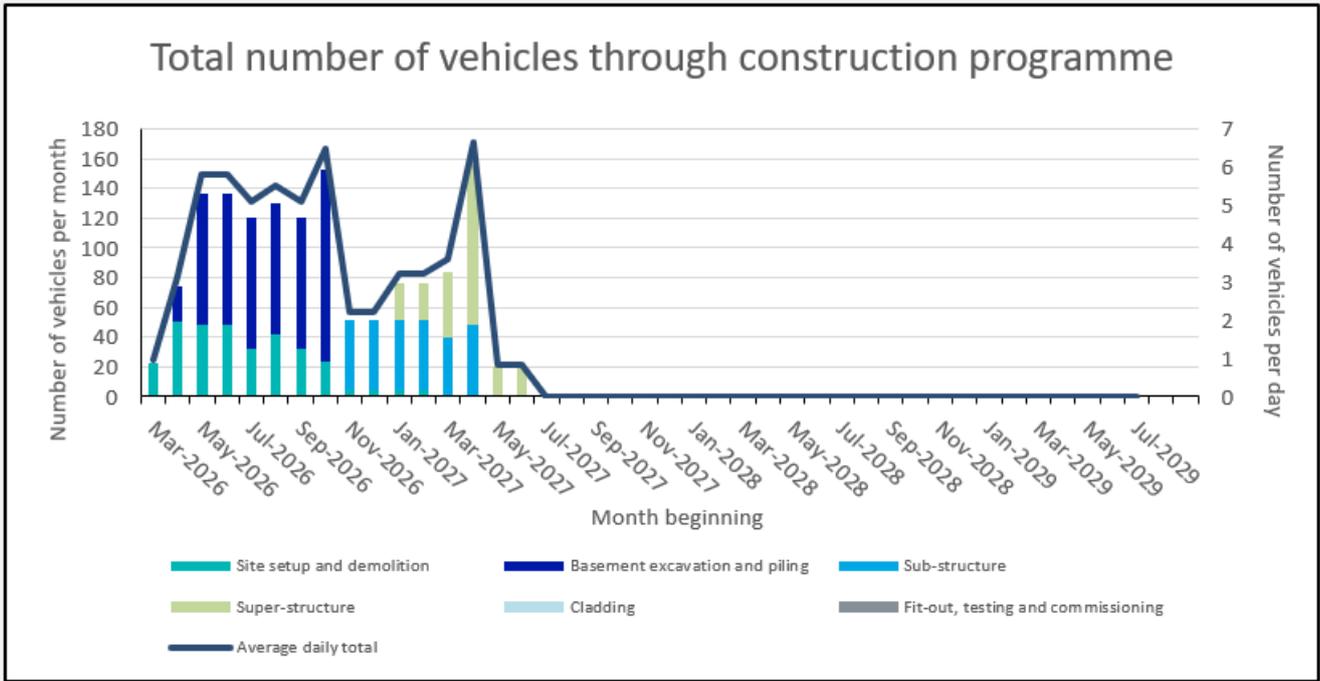


Figure 20: Estimated Construction Vehicles – Monthly And Daily.

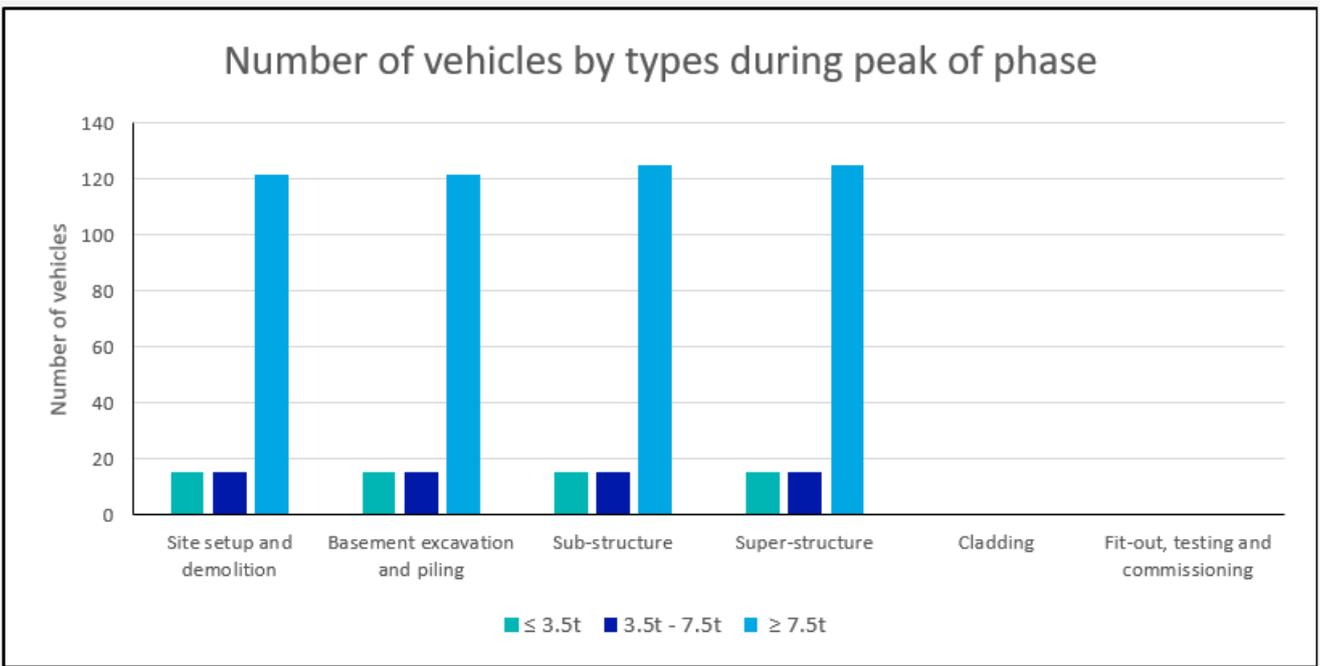


Figure 21: Hourly Arrival Profile of Vehicles During Peak.

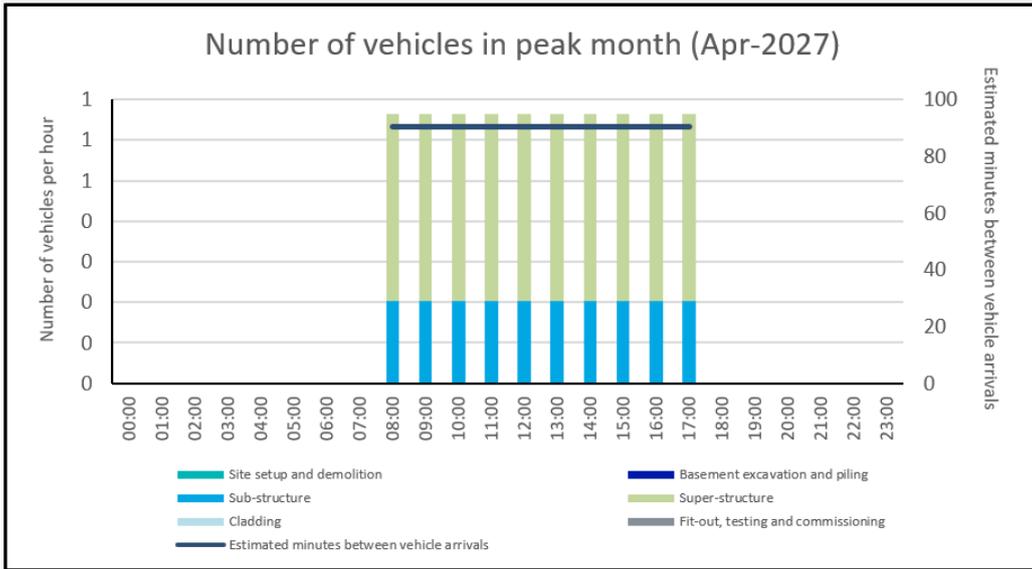


Figure 22: Number And Vehicle Type By Phase of Construction.

5. Implementing, Monitoring and Updating:

The Site Management Team will review the CLP to ensure it is appropriate and is being implemented effectively. Changes may arise from a change of scope, safety audits/comments or from opportunities for improvement. The CLP will then be updated to reflect any changes which have occurred.

This document will be reviewed ongoing throughout the contract duration.

This document and the input will be reviewed by an approved and competent person and then forwarded to the companies’ respective Subcontractors the Client and relevant stakeholders as well as the site management team.

Toureen Group will maintain records of any review. Any / all changes will be agreed with the council before implementation on-site.

The following persons are responsible for the development, implementation, and monitoring of the CLP:

Title	Name	E-Mail
Operations Director	Shane Croghan	Shane.croghan@toureen.co.uk
Contracts Director	Andy Fox	Andy.fox@toureen.co.uk
SHEP Manager	Matt Gifford	Matt.gifford@toureen.co.uk
Environmental Manager	Claire Fundrey	Claire.fundrey@toureen.co.uk
Logistics Manager	TBC	
Project Manager - Demolition	TBC	
Project Manager - Construction	TBC	

The appointed site traffic marshals shall be responsible for the movement of vehicles on and off-site including banking and reversing etc. of all plant and delivery vehicles. The team will consist of a 2/4 Traffic Marshals (TM).

3.1. Daily Checks:

The following daily briefing preparation will take place:

1. Traffic Marshals available for following day.
2. Ensure that there are stand in TM's for above operatives during break times.
3. Site Manager/Gateman/Traffic Marshals issued with the following days delivery schedule.
4. Discussions of any anticipated disruption to the following day's delivery schedule.
5. Any oversized loads or problematic deliveries discussed.
6. Any items that may need to go on the notice board or that may have a traffic management or routeing impact.

3.2. Site Vehicle Rules:

1. No passengers are permitted to ride on site vehicles unless suitable provision is made.
2. Site drivers/operators & pedestrians are to follow & comply with site safety signs & road markings at all times.
3. Site pedestrians are to keep to designated & signed footpaths & crossing points.
4. Drivers/operators to obey site speed limits (5mph).
5. Roads & footpaths are to be kept clean, tidy & free from materials & waste.
6. Reversing must be avoided when possible.
7. No reversing without the assistance of a traffic marshal.
8. No general parking on site at any time.
9. Vehicles must not be left running whilst unattended.
10. Keys must be removed & vehicles left so as to prevent unintentional movement (e.g. Handbrake on).
11. Mobile phones must not be used whilst operating plant, driving vehicles, or directing vehicles.
12. All plant certificates & plant operator's certificates to be issued to Toureen Group site management.
13. All delivery drivers must wear the site required PPE when on site.
14. Vehicles must come with adequate edge protection.
15. All drivers attending site will be provided with and will comply with the details contained within this plan and take direction from the TM. When drivers need to exit their vehicle on site, a driver's induction must be completed. This will be given by the TMS or TM.

