



# **Appendix 2**

## **Construction Work Activities on Saturday**

### **In the City of London**

#### **Public Consultation Outcomes Report**

**Prepared by: JA**

**Approved by: RP**

**Date 29<sup>th</sup> October 2018**

## Introduction

The City of London Corporation is reviewing the existing 'standard hours' arrangements for noisy Saturday morning construction activities and has recently held a public consultation around the principle of ending or revising the 'standard hours' working arrangements for noisy work Saturdays.

The high volume of development in the Square Mile, including major office redevelopments in the east of the City, has the potential to have significant environmental impacts on occupiers of nearby premises. Protecting City businesses, residents and other noise sensitive premises (e.g. schools) from noise and vibration impacts of construction sites is a necessary part of ensuring the City is an excellent place to live, work, learn and to do business.

"Noisy" work in this context is usually defined as being 'where audible at the site boundary, or another location agreed by the City, and/or is likely to cause disturbance'. The standard hours for noisy construction activity are set out in the Code of Practice for Deconstruction and Construction (the Code) and can also be found at [www.cityoflondon.gov.uk/noisestrategy](http://www.cityoflondon.gov.uk/noisestrategy), and include 'quiet hours' as stated below.

'Standard hours' currently permitted for **noisy** work are normally as follows:

- 08:00 - 18:00 hours (Monday to Friday);
- 08:00 - 13:00 hours (Saturday);
- No noisy working is permitted on Sundays, bank or national holidays. Within the standard hours there are 'quiet hours' (10:00-12:00 and 14:00-16:00 from Mondays to Friday) which are observed where City businesses may be affected by noise or vibration.

Outside 'standard hours' and during 'quiet hours' the following noise generating activities are not usually permitted where the activities are likely to cause disturbance:

- Cutting using power tools;
- Breaking out using power tools;
- Other noise generating activities, depending on the specific location of site and neighbours.
- The use of impact fasteners;
- The loading of heavy materials;
- Other noisy activities, depending on the specific location of site and neighbours, deemed unacceptable by Environmental Health Officers (EHO).
- These may include but are not limited to: the erection and dismantling of scaffolding, cranes, road resurfacing and vehicle movements.

Allowing some hours of noisy working on Saturdays can reduce the overall time taken for projects to complete. However, this needs to be balanced against amenity for those in the area.

Noisy work outside of the 'standard hours' or during 'quiet hours' may currently be permitted where this is aligned with the needs of the local community and City businesses. When requests from contractors for variations to hours of work are made the typical matters considered include the proximity to residential properties, places of worship and hospitals. Variations to these hours may be approved for works where impacts are expected to be low. Variations may be refused if the impacts on neighbours are considered high or previous variations have not been fully complied with.

A public consultation was held between 7<sup>th</sup> May 2018 and 7<sup>th</sup> August 2018 and received a total of 725 responses from individuals and organisations. This report presents the outcomes of the consultation and is structured as follows;

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## Section One: Summary of survey outcomes

### *High Level Support*

- **725** responses were received to the survey
- **62%** of respondents felt that noisy Saturday working between 08:00 – 13:00 should continue, **35%** did not, and **3%** gave no opinion.
- The largest respondent group in favour of retaining the current arrangements were **individuals working** in the City of London.
- The largest respondent group **not** in favour of continuing the current arrangements were **individuals living** in the City of London.

### *Potential Partial Permissions*

- **47%** of respondents are open to partial permissions such as time and area alterations **43%** are not, **10%** gave no opinion. Regarding partial permissions the most common remark provided was that all current arrangements should remain in place, followed by comments around shifting noisy Saturday working away from residential clusters or moving to a later start time.
- **48%** of respondents felt that there should **not** be an extra hour of noisy working on Monday-Friday instead of noisy Saturday working as suggested by the City, **44%** felt that there should, and **8%** gave no opinion. Respondents felt that the extra hour proposed may help, but that Saturday working was preferred overall and that an extra weekday hour may result in more disturbance to residents.

### *Effect of existing arrangements and potential removal*

- **42%** of respondents stated that they had not been affected by Saturday noisy working, **34%** stated that they had been negatively affected, **13%** said they had been positively affected, and **11%** gave no opinion. Those negatively affected by the current arrangements cited the general effects of noise and those positively affected cited efficiencies in project time and cost facilitated by Saturday working.
- **48%** of respondents stated they would be negatively affected should noisy Saturday working be removed, **29%** stated they would be positively affected, **14%** said they would not be affected, and **9%** gave no opinion. The most common statements regarding impact of removal were the increase in cost or time to complete a project for those negatively affected, followed by a potentially quieter environment for those positively affected, should it be removed.

### *Organisations*

- Responses from organisations accounted for **152** or **21%** of all responses and on average each organisation stated that they represented circa **2500** people. **86%** of the organisations that responded stated that they thought existing arrangements should continue, citing a potential increase in cost and time to projects and an inability to conduct specialist work, should noisy Saturday working be withdrawn.

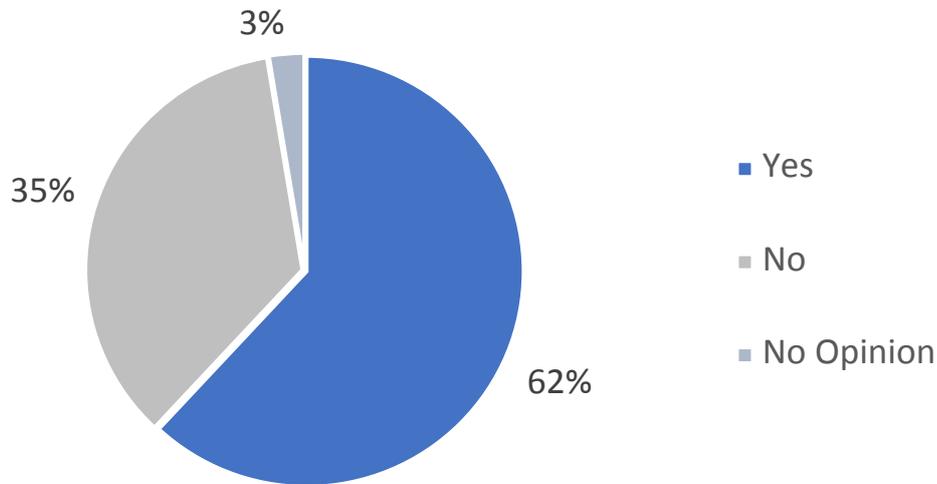
### *Protected characteristics*

- 109 out of 725 respondents stated that they had been impacted in respect of one or more protected characteristics by noisy Saturday working. The most commonly cited protected characteristics were age disability and pregnancy and maternity, and the most common comment on how respondents had been affected was around noisy works impacting rest and physical and mental health.

**Section Two: Results by question**

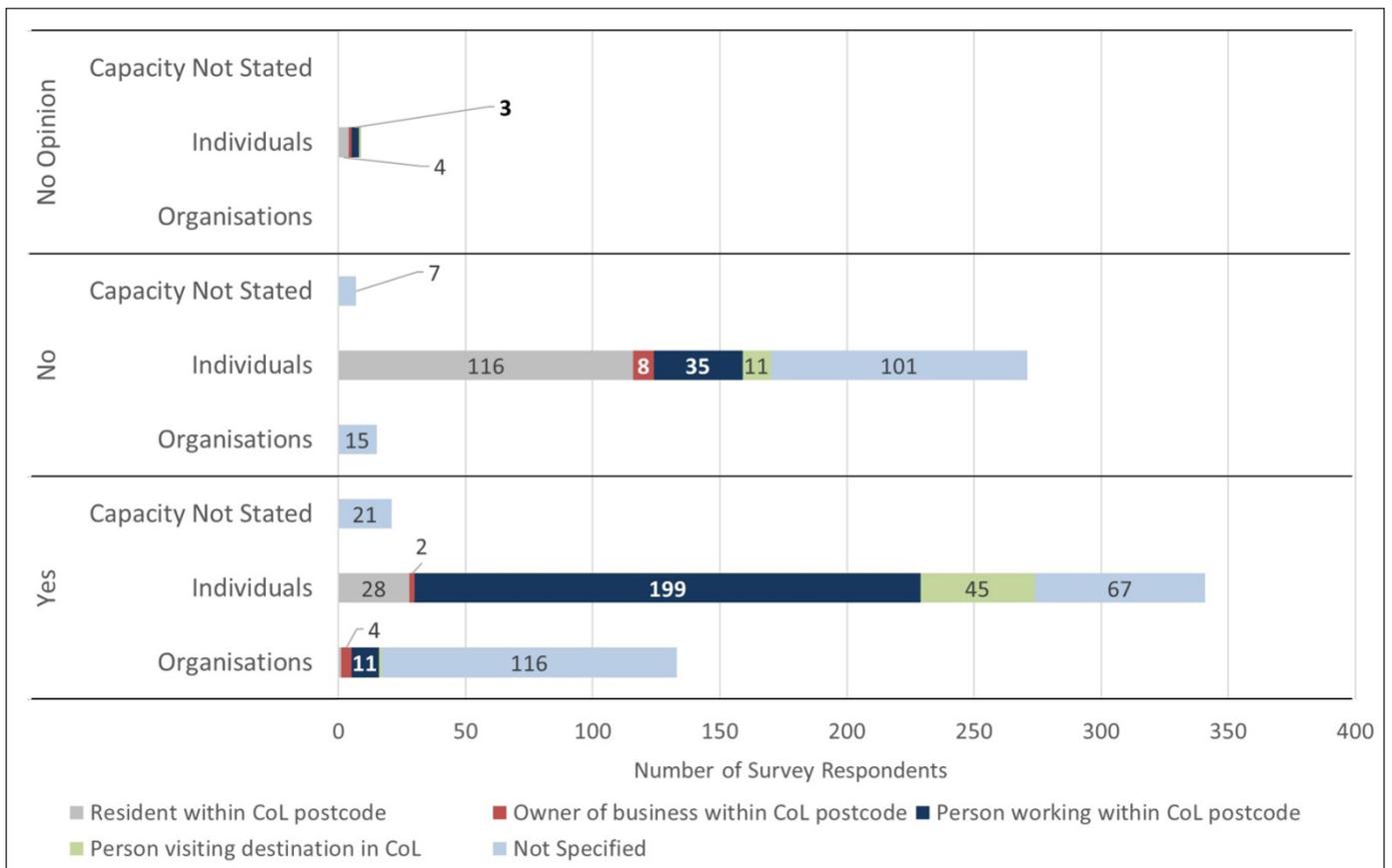
**Question One: Do you think the existing Saturday permitted hours for noisy construction work activity (08.00-13.00) should continue?**

**Figure 1: Response outcome for Question 1 (n = 725)**



A total of 725 responses to this question were received, with 449 respondents stating that the existing Saturday permitted hours for noisy construction work activity should continue. 257 stated that the permitted hours should not continue, and 19 gave no opinion. Figure 2 below shows the capacity in which respondents undertook the survey and amalgamates information from survey questions 1, 7 and 9.

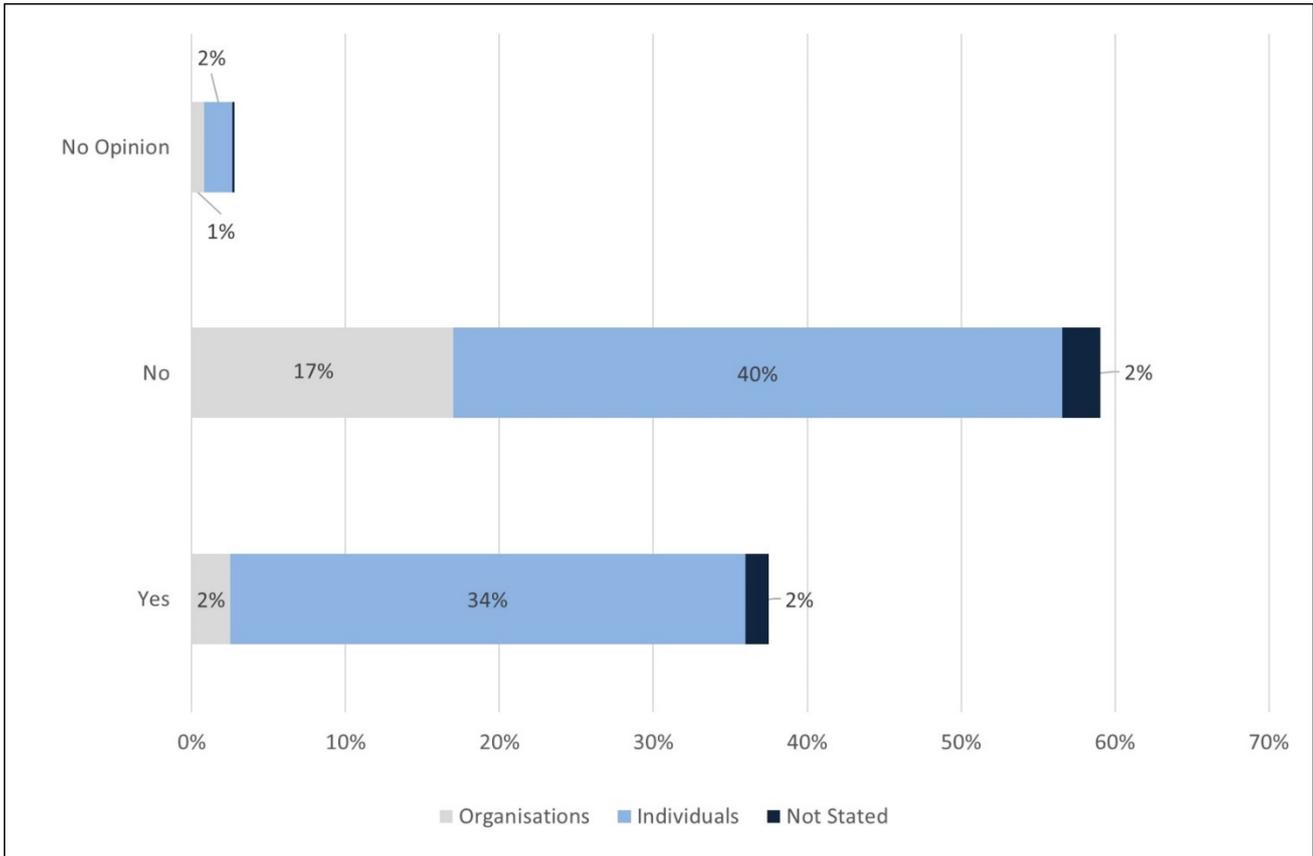
**Figure 2: Respondent support by response capacity**



*\*it should be noted that respondents were able to provide more than one answer to question 9, i.e. they could state that they were a resident and a person working within a CoL postcode. Respondents were only permitted to provide one answer to questions 1 (overall support) and 7 (individual or organisation).*

**Question Two: Do you think that, unless permitted in emergencies or upon special application (such as for public safety reasons, or where local neighbours would prefer it to speed up the project overall), there should be no noisy works permitted on Saturdays?**

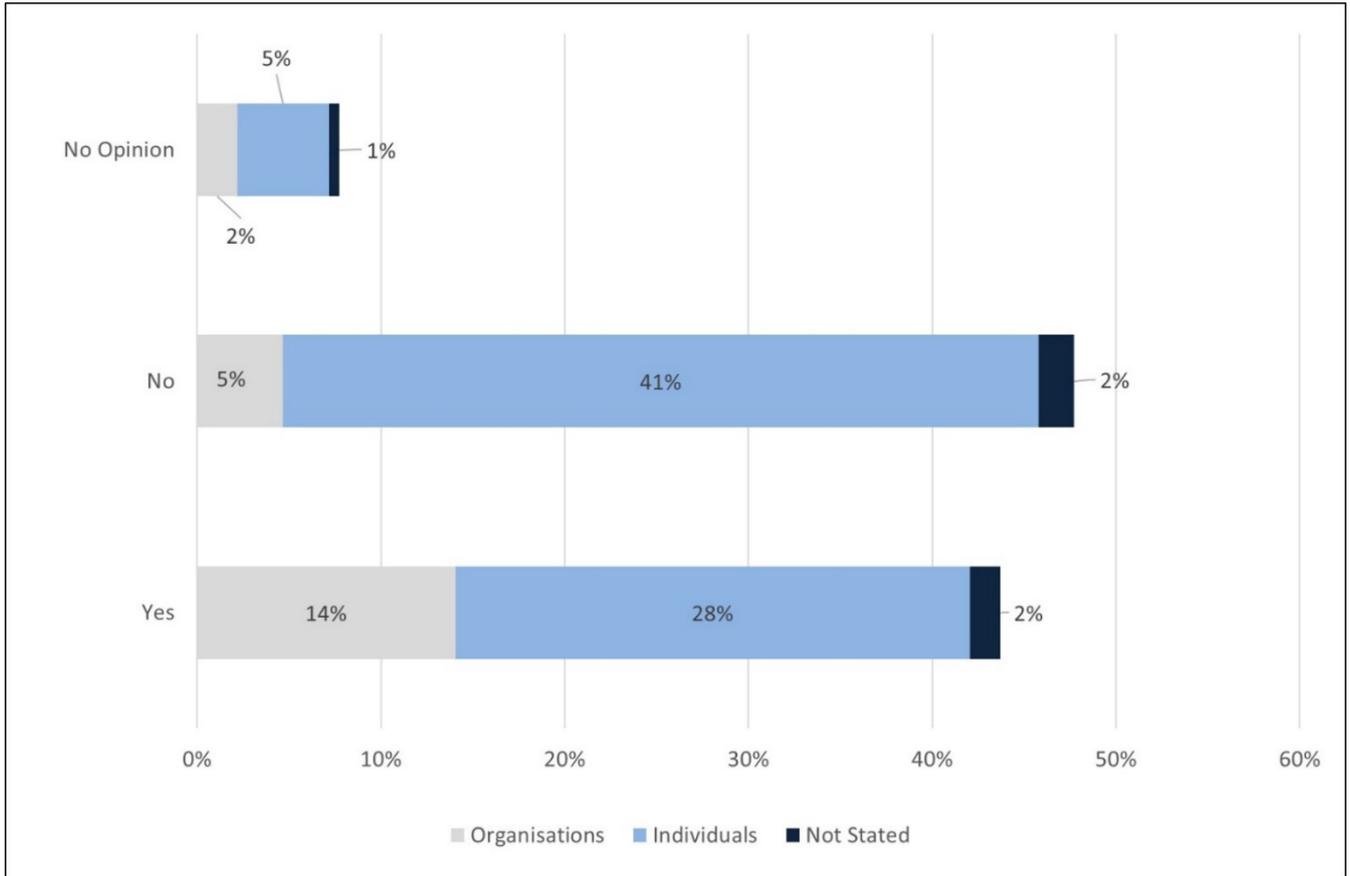
**Figure 3: Response outcome for Question Two**



There was a total of 725 responses to this question, with a total of 433 respondents giving a 'no' answer, 272 stating 'yes' and 20 giving no opinion.

**Question Three: Do you think that if noisy construction works were not permitted on Saturdays, there should be an extra hour of noisy construction work permitted on Monday-Friday, from 18:00 until 19:00?**

**Figure 4: Response outcome for Question Three**



A total of 725 responses were received to this question. 346 stated that there should **not** be an extra hour of noisy construction work permitted on Monday-Friday from 18:00 to 19:00, should construction works not be permitted on Saturdays. 323 of respondents stated that there should, and 56 gave no opinion.

Respondents were then asked to give a reason to support their answer, respondents answering ‘Yes’ to this question gave the following reasons for their answer;

Reasons Provided ‘Yes’	Organisations	Individuals	Not Stated	Total
Would help should Saturday working be banned	35	49	0	<b>84</b>
Saturdays are preferred	28	38	1	<b>67</b>
Would be less disturbing / disruptive	2	19	0	<b>21</b>
Would be preferable to Saturday	2	14	0	<b>16</b>
Would be more disturbing / disruptive	4	5	0	<b>9</b>
Would be a last resort	2	6	0	<b>8</b>
Would be more productive	1	4	0	<b>5</b>

*\*Not all respondents that answered the question took the opportunity to provide a comment*

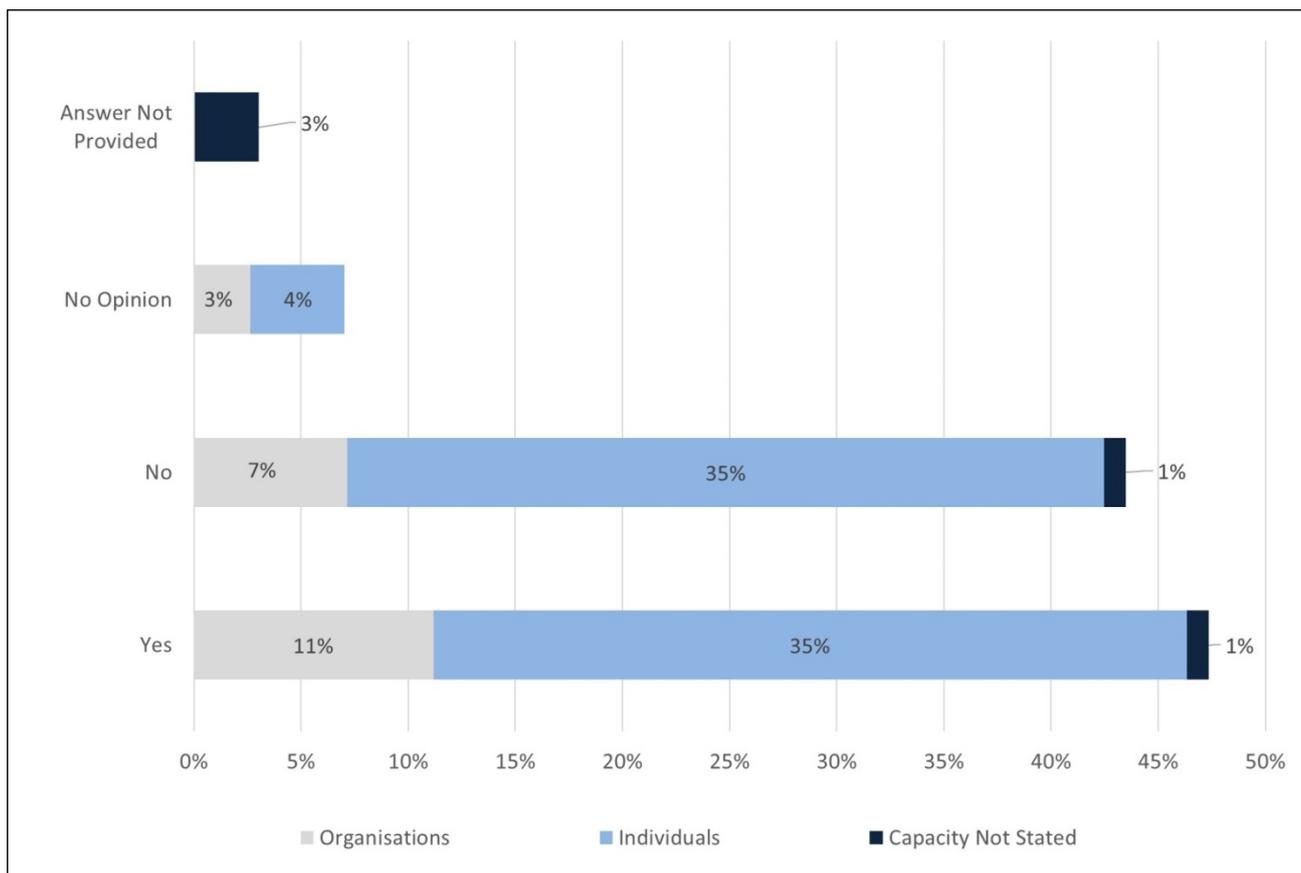
Respondents answering 'No' to this question gave the following reasons for their answer;

<b>Reasons Provided 'No'</b>	<b>Organisations</b>	<b>Individuals</b>	<b>Not Stated</b>	<b>Total</b>
Extra hour would be more disturbing / disruptive	0	63	2	<b>65</b>
Would be too difficult for staff (day too long)	8	24	0	<b>32</b>
Saturdays are preferred	1	12	0	<b>13</b>
Awkward / substantive works or deliveries are easier to carry out on Saturdays than weekday evenings	5	5	0	<b>10</b>
5 one hour slots would be less productive	4	5	0	<b>9</b>
Would increase project cost / time	1	7	0	<b>8</b>
Saturday working withdrawn, with no extended hours during the week	0	5	1	<b>6</b>
Other	0	6	0	<b>6</b>
Change Saturday working times e.g. later start 0900.	0	3	0	<b>3</b>
Would increase pollution / impact traffic flows	0	2	0	<b>2</b>

*\*Not all respondents that answered the question took the opportunity to provide a comment*

**Question Four: Do you think that, unless permitted in emergencies or upon special application as in question 2, that noisy Saturday construction work should be partially permitted, e.g. specific times, locations, away from residential clusters, alternate weekends, etc.?**

**Figure 5: Response outcome for Question Four**



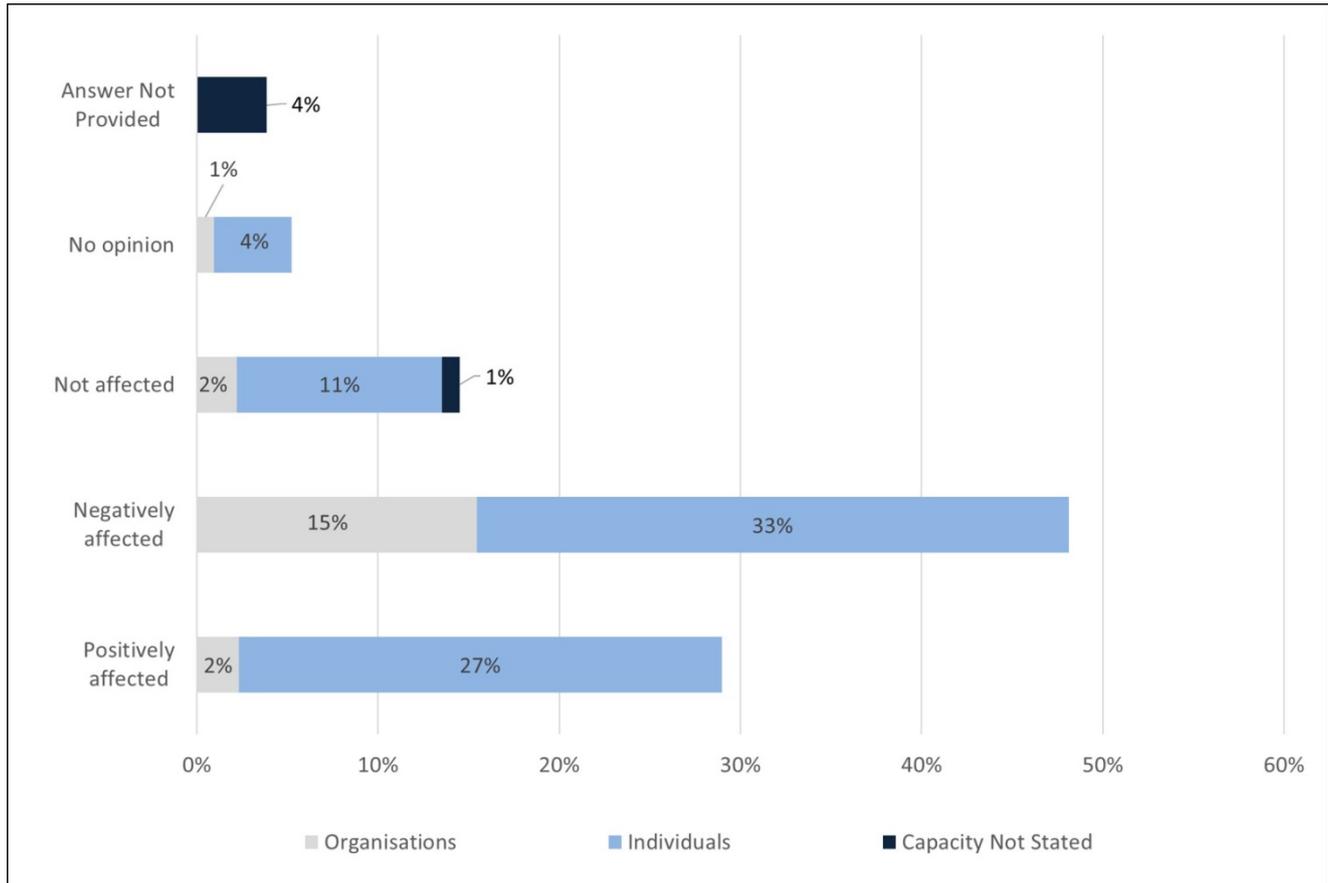
A total of 703 responses were received to this question, with 338 respondents stating that noisy Saturday construction work should be partially permitted, 313 said that it should not be partially permitted, 52 stated no opinion and 22 failed to provide an answer. Respondents who answered ‘Yes’ to this question were then asked to state what they believe should be permitted.

What should be permitted?	Organisations	Individuals	Not Stated	Total
Everything should remain permitted / No change	34	73	1	<b>108</b>
Away from residential clusters	5	72	1	<b>78</b>
Special time constraints	11	26	0	<b>37</b>
Special construction / emergencies / health and safety risk	9	25	1	<b>35</b>
Careful management of times and locations	9	17	0	<b>26</b>
Nothing should be permitted at the weekend	0	11	1	<b>12</b>
Contractors are likely to abuse permissions	0	7	0	<b>7</b>
Partial permission would add to cost / project time	4	3	0	<b>7</b>

*\*Not all respondents that answered the question took the opportunity to provide a comment*

**Question Five: Do you think you or your organisation would be affected if noisy construction work was not permitted on Saturdays?**

**Figure 6: Response outcome for Question Five**



A total of 697 responses were received to this question, with 350 respondents stating that they would be negatively affected, 210 respondents stated that they would be positively affected, 99 stated that they would not be affected and 38 gave no opinion. Respondents were then asked to describe how they would be affected and the most common responses are outlined below.

Reasons for being positively affected	Organisations	Individuals	Not Stated	Total
Would be quieter	2	87	0	89
Would improve life as a resident	2	69	0	71
Would improve air quality	0	9	0	9
Would give construction staff more free time	2	0	0	2

*\*Not all respondents that answered the question took the opportunity to provide a comment*

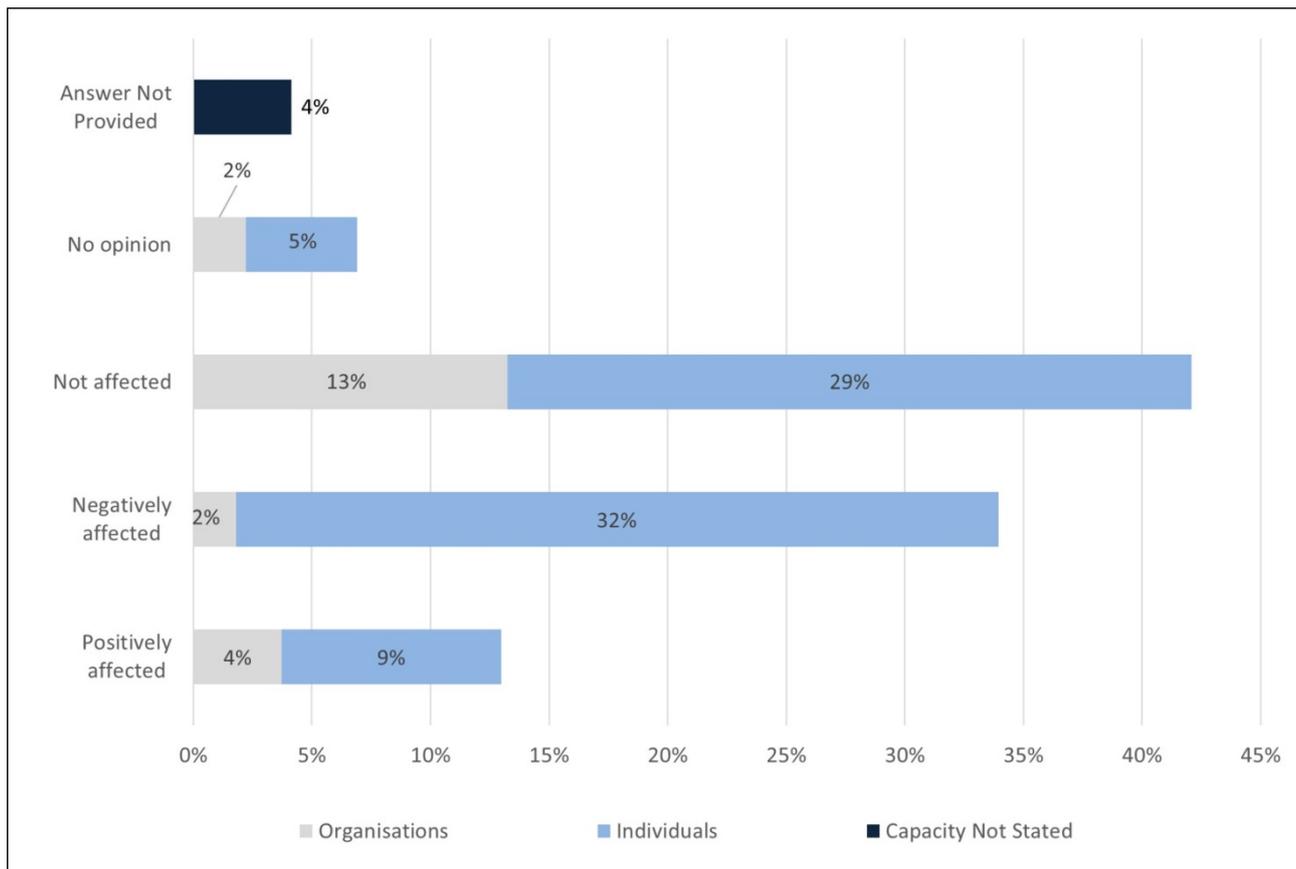
Reasons for being negatively affected	Organisations	Individuals	Not Stated	Total
Increase in project cost / time	48	88	1	137
Specialist work needs to be conducted at weekends	24	26	0	50
Would lose workforce (due to reduction in pay)	8	13	0	21
Would constitute a health and safety risk	4	7	0	11
Work to be carried out at other unsociable times	3	7	0	10
Extension of weekday hours would be negative	3	5	0	8
It would negatively impact on workers' health	2	5	0	7
Difficult to coordinate works at busier times	3	3	0	6

*\*Not all respondents that answered the question took the opportunity to provide a comment*

*\*22 respondents to this question stated that they would be positively affected but their comment gave detail on how they would be negatively affected, 10 respondents did the reverse, as such a total of 32 answers were changed to reflect the intended response.*

**Question Six: Are you or have you been affected by noisy Saturday construction work activity?**

**Figure 7: Response outcome for Question six**



A total of 695 responses were received to this question, 305 respondents stated that they had not been affected by noisy Saturday construction work activity, 246 stated that they had been negatively affected and 94 stated that they had been positively affected, 50 gave no opinion. Respondents were then asked to describe how they have been affected, the tables below show the most commonly cited responses.

Reasons for being positively affected	Organisations	Individuals	Not Stated	Total
Efficiencies in project time / cost	6	14	0	20
Has allowed specialist works to be conducted	6	9	0	15
Works are easier to undertake due to a quieter environment	8	6	0	14

*\*Not all respondents that answered the question took the opportunity to provide a comment*

Reasons for being negatively affected	Organisations	Individuals	Not Stated	Total
Affected by noise	8	142	0	150
Works continue or begin outside of allocated times	1	20	0	21
Dust / air pollution	0	14	0	14
Poor behaviour of staff	0	9	0	9
likely to be affected in future	0	4	0	4

*\*Not all respondents that answered the question took the opportunity to provide a comment*

*\*16 respondents to this question stated that they had been positively affected but their comment gave detail on how they would be negatively affected, 2 respondents did the reverse, as such a total of 18 answers were changed to reflect the intended response.*



**Question Eleven: Do you have any comments, evidence or proposals (including alternatives) that you wish us to consider regarding the issue of noisy Saturday morning construction works and/or any of the questions asked above?**

184 respondents used question fourteen to provide a concluding comment to their survey response: Table X below shows the most commonly provided comments;

<b>Comment</b>	<b>Organisations</b>	<b>Individuals</b>	<b>Not Stated</b>	<b>Total</b>
Residents should be given priority or more consideration	1	41	0	<b>42</b>
Saturday working withdrawn, with no extended hours during the week / no weekend working	2	31	0	<b>33</b>
No change to existing arrangements	7	21	0	<b>28</b>
Change times of noisy Saturday working e.g. 0900 start	4	13	0	<b>17</b>
Enhanced enforcement of contractors	0	12	0	<b>12</b>
Would result in increase in project cost / time	5	7	0	<b>12</b>
No comment / none	3	6	0	<b>9</b>
Works are easier to undertake due to a quieter environment	1	8	0	<b>9</b>
Saturday working should be shifted to the weekday	2	4	0	<b>6</b>
Noisy Saturday working in emergencies only	1	5	0	<b>6</b>
Removal would impact London's economy	1	5	0	<b>6</b>
Specialist work needs to be conducted at weekends	1	3	0	<b>4</b>

### Section Three: Responses from Organisations

Within the analysis of the public consultation responses, responses from organisations have been included in the overall dataset in the same manner as any other individual response (i.e. the response from an organisation is counted as 'one' within the results). This is in order to avoid single responses unfairly weighting the survey outcomes, where an organisation has simply stated that it represents a large group of people.

The City of London is however aware that organisations can speak on behalf of a number of employees and stakeholders and as such this section of the report provides more detail on the sizes and types of organisations that provided a response to the consultation, so that this can be considered when interpreting the results provided within this report.

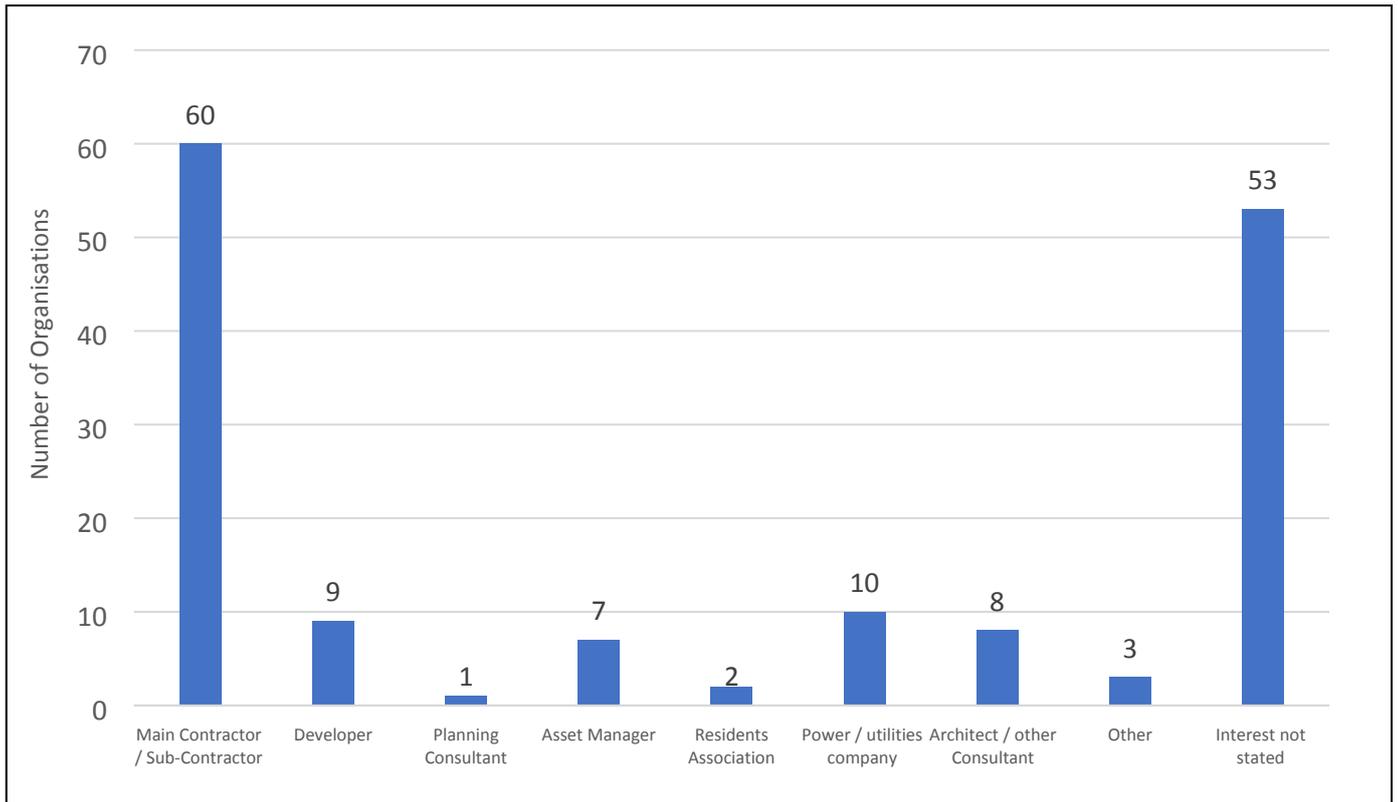
#### Summary of responses from organisations

- 21% of all survey responses came from respondents identifying as organisations.
- 86% of the organisations that responded stated that they thought existing arrangements should continue.
- 67% of the organisations that responded were in favour of the City of London's proposal to extend noisy working hours Monday – Friday in lieu of Saturday working, although the majority stated that Saturdays would be preferred.
- The opinion of organisations was split regarding partial permissions and organisations commented that the current arrangements should be retained.
- Organisations repeatedly cited concerns around increases in project cost and time should noisy Saturday working be removed.
- Whilst organisations submitted responses on behalf of their workers, a large number of individuals working for organisations in the City of London submitted responses in a personal capacity as evidenced by Figure 2.
- A number of organisations including contractors, developers and resident's organisations submitted formal written responses to the City of London in order to provide further opinion outside of the online consultation, these responses are presented in Appendix 1.

Organisations were also directly asked to provide qualitative responses to the following three questions;

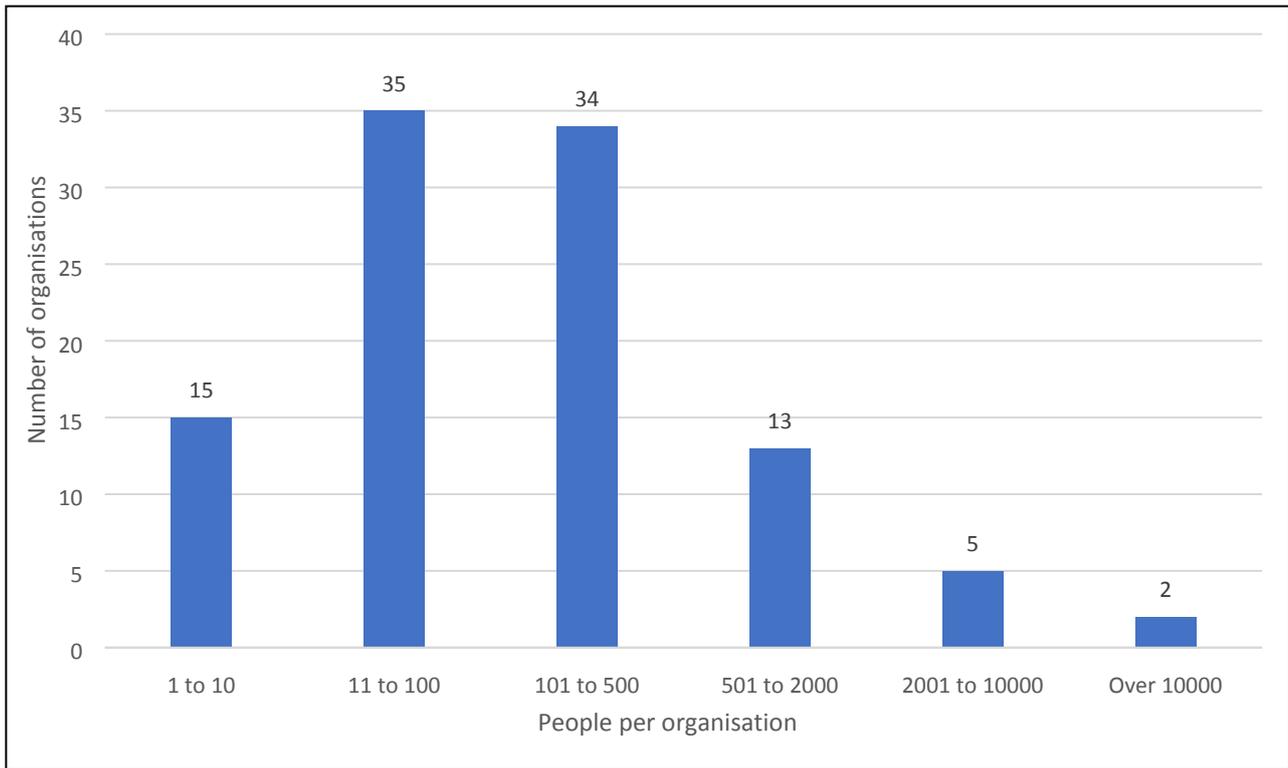
1. *What is the name and postal address of your organisation and the nature of its interest in Saturday construction works?*
2. *How many people does your organisation represent?*
3. *How many people were involved in taking the decision on how your organisation should respond to this questionnaire?*

**Figure 8: Organisation responses to ‘What is the nature of your organisation’s interest in Saturday construction works?’**

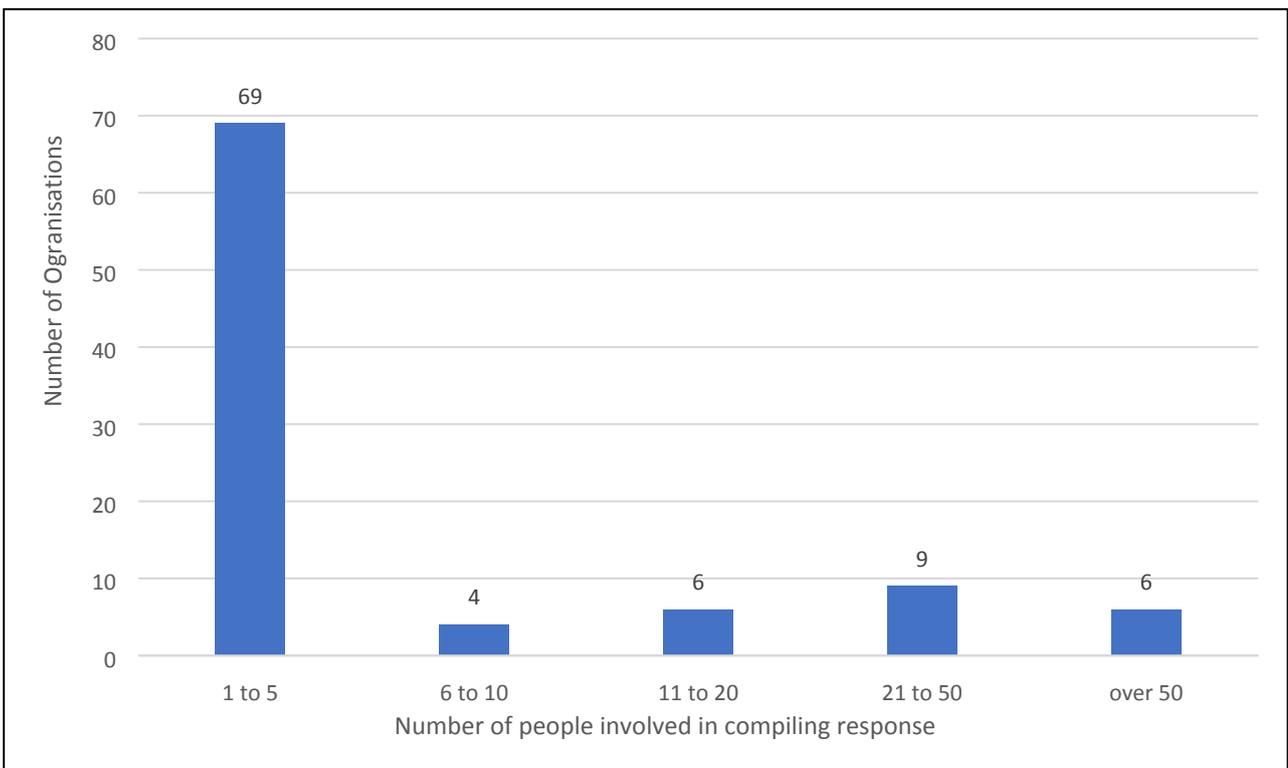


For those respondents who identified themselves as responding to the consultation as an organisation, the majority were observed as being Main or Sub - contractors, responses were also received from property developers, asset managers and organisations that provide specialist works or services.

**Figure 9: Organisation responses to 'How many people does your organisation represent?'**



**Figure 10: Organisation responses to 'How many people were involved in taking the decision on how your organisation should respond to this questionnaire?'**



Figures 9 and 10 demonstrate that there has been a large degree of variation in the sizes of organisations responding to the consultation and responses were received from small companies to large organisations operating in the City of London.

#### Section Four: Protected Characteristics

Respondents to the consultation were asked whether the issue of noisy Saturday construction works had any impact on them as an individual, group or organisation under the protected characteristic listed below, the percentage of all respondents that cited each characteristic is also shown.

Protected Characteristic	Number of survey respondents affected	% of all survey respondents affected
Age	57	8%
Disability	25	3%
Pregnancy & Maternity	18	2%
Religion or belief	7	1%
Sex	2	2%
Gender reassignment	0	0%
Race	0	0%
Sexual Orientation	0	0%

Respondents were then asked to provide detail surrounding the impact to them under the protected characteristic. The most common comments provided and the number of respondents that mentioned being affected in this manner are detailed below.

Comment	Number of survey respondents
Noisy works impacting rest	43
None / Not Applicable	26
Young children impacted by noise	11
Noisy work exacerbating health conditions	11
Works impacting access to places of worship	2

## Section Five: Conclusions

The City of London Corporation has consulted on the principle of ending or revising the ‘standard hours’ working arrangements for Saturdays. 725 responses were received to the online survey and 62% of respondents felt that noisy Saturday working between 08:00 – 13:00 should continue, 35% did not, and 3% gave no opinion. 21% of all responses were received from organisations, 75% from individuals and 4% did not state their capacity. Looking more closely at the profile of respondents and their support, the largest respondent group in favour of retaining the current arrangements were individuals working in the City of London. The largest respondent group not in favour of continuing the current arrangements were individuals living in the City of London.

The City of London Corporation asked respondents to provide their thoughts on a potential extra hour of noisy working on Monday to Friday should Saturday working be removed. A narrow majority of respondents felt that this would not be suitable due to potential extra disturbance. Respondents also stated that Saturday working would be preferable overall.

A degree of openness was displayed by survey respondents with regards to other types of partial permissions such as locating noisy work away from residential clusters, however the overriding sentiment that Saturday working arrangements should remain unchanged was again displayed by respondents.

Respondents were asked how they had been affected by noisy Saturday working and how they might be affected should it be removed, the majority of respondents stated that they had not been affected, some respondents stated that they had been negatively affected by noise. Regarding removal, a majority of respondents stated that they would be negatively affected should noisy Saturday working be removed due to increases in project cost or programme length, however a smaller portion of respondents stated they would be positively affected by a quieter environment.

Organisations responded to the consultation on behalf of their employees and the majority stated that they thought existing arrangements should continue, in order to avoid unfair weighting of the consultation outcomes, the response of an organisation was treated in the same manner as that of an individual.

15% of all survey respondents stated that noisy construction works had impacted them under a protected characteristic, the majority of which stated age but also disability, pregnancy and maternity as their affected characteristic and the impact of noisy works to their rest as the overall issue.

Residents living within the City of London make up the majority who wish to see noisy Saturday working in its current form removed, the majority of respondents in this category state disruption from noise due to ongoing construction works and call for more consideration in the planning and execution of construction works in the City.

The overall sentiment of the survey outcome is a preference for noisy Saturday working hours to remain unchanged with a majority support received to question 1. As demonstrated the majority of concern around removal of Saturday working comes from individuals who work within the City of London and to a lesser extent, the organisations which these individuals work for. The major concerns cited by these respondents is the potential increase to project cost and time and the ability to conduct specialist work at weekends due to a quieter City environment.

Respondents appear to agree that an extension of weekday working hours in lieu of Saturday working would not be suitable, however the survey has uncovered a willingness to consider other types of permissions which may suit all stakeholders. A shift in Saturday noisy working hours to 0900 to 1400 was suggested in a number of responses.

## Appendix One: Submitted responses from organisations

A number of organisations including contractors, developers and resident's organisations submitted formal written responses to the City of London in order to provide further opinion outside of the online consultation, these responses are below.

Full consultation responses for all respondents is available on request.

### Response from the Barbican Association

Dear XXXX

Please accept this letter as formal response from the Barbican Association to the City's current consultation on Saturday working on construction sites. We couldn't make the points we wanted to make within your survey format.

The Barbican Association is the recognised residents' association for the 4000 or so residents of the Barbican estate.

It was the BA's request, in response to the consultation last year on the revision of the City's Code of Practice for Deconstruction and Construction Sites, that the Code should not permit noisy working on Saturday mornings in the vicinity of residential areas. This request has prompted your current consultation.

Our points in response to the current consultation are:

1. We are not clear whether your consultation is offering No work at all on Saturday mornings or No noisy work. We understand that Saturday mornings are currently for Noisy work – in that they are not designated quiet hours. However, it would be possible to designate Saturday mornings as quiet working hours. Indeed, this seems to be what your neighbour local authority, Westminster, has done in banning noisy works in residential areas on Saturday mornings

2. Please note that our original request was for no noisy works on Saturday mornings next to residential areas. We would not presume to affect working throughout the City as a whole.

We made this request because the numbers of building sites close to the Barbican (and indeed other residential estates/areas) has increased dramatically over the past few years, and is not likely to diminish.

- We are still not asking for Saturday morning noisy working to be banned throughout the City – only in residential areas. If that approach were adopted that would mean that most building sites in the City would not be affected.

- We do not think it should be too difficult to identify "residential areas." Although there are some small developments of flats throughout the City, the vast majority of the City's residential accommodation is clustered in some well-defined areas. At its crudest you could use the wards of the City that are designated as "residential wards", but the criteria could be more nuanced than that – after all contractors have to discuss with Environmental Health sensitive sites (including residences) that might be affected by their work, and so presumably they have to identify them. And the introduction to your consultation says that variations to [standard] hours may be approved for works where impacts are expected to be low; are in locations where there are no affected neighbours or for safety, logistics or engineering reasons. Variations may be refused if the impacts

on neighbours are considered high and cannot be mitigated or previous variations have not been fully complied with.” So you already make judgements about how close sites are to residences.

3. We have a major concern that the outcome of the consultation could result in residents being worse off than they are now.

If the decision is to ban Saturday morning working altogether and add an extra hour to the standard hours of Monday to Friday then we accept that theoretically we would not be worse off than before.

But if the decision is to designate Saturday morning working as quiet hours and to add an extra hour to the standard hours for Monday to Friday then that actually extends the working period for construction sites. And though residents would see some benefit on Saturday mornings (reduced noise and disturbance), that would be outweighed by major disbenefits during the week as work extended longer into the evening (or earlier into the morning).

A continuing risk is that removing Saturday morning working would lead to more requests for variations to allow Saturday noisy working. We would seek assurances that more variations would not be granted simply because of any change in the standard hours.

4. Our preference is for our original request – ie No noisy working (by implication quiet working only) on Saturday mornings for sites that are next to residential areas. And no more hours during the week. This has the following advantages:

a) It means that most of the City can continue as before on national standard hours. It only affects a minority of sites.

As your consultation points out, much of the City is quieter on Saturdays and it seems a shame to prevent contractors from using that time – where it won't disturb people.

b) It keeps the City in line with national standard hours – with only one minor exception, which is not a precedent because Westminster has a similar provision.

c) Within residential areas contractors can still work – but to the quiet hours regime.

We note that the Construction code says in 3.1 “Protecting City businesses, residents and other noise sensitive premises (e.g. schools) from noise and vibration impacts of construction sites is essential to the City's continuing reputation as an excellent place to live, work and to do business.”

Banning noisy work on Saturday mornings in residential areas would give tangible effect to the desire to keep the City as an excellent place to live, at minimal cost to the rest of the City. A regime that worked fine 10 years ago no longer does so because of the increased numbers of building sites around the Barbican and other residential areas.

Yours sincerely

XXXXX, chair BA

XXXXX, chair BA Planning Subcommittee

## Response from Unite Union

Dear XXXX,

Further to your email below, which has been passed to me, please see Unites response below.

*'Saturday morning working on major construction sites has been the norm for many years within the City London and as such many construction workers now consider earnings on a Saturday to be a normal part of their wages. It therefore follows that any ban on Saturday working will result in a reduction in wages for many construction workers. The sudden introduction of such a ban also has the potential to result in some clients reconsidering the feasibility of building in the City of London and thus adversely effect the level of construction active within the City.*

*Another consideration is that certain activities associated with the construction process require road closures. Due to this need some type's of work can only be carried out on a Saturday or Sunday, it would therefore be necessary to have some sort of licence/exemption scheme in place, so as to allow for this.*

*Unite believe that working hours should be family friendly and that a properly planned project should not require Saturday working to be standard, we would therefore support such a ban. However, in order to minimise disruption and hardship to workers, while also allowing clients to prepare for such a ban Unite believe any such ban should be phased in.'*

Regards

XXXXX

Unite the Union

## Response from City Property Association (CPA)



City of London Corporation  
PO Box 270  
Guildhall, London  
EC2P 2EJ

By email: [publicprotection@cityoflondon.gov.uk](mailto:publicprotection@cityoflondon.gov.uk)

26 July 2018

**RE: Consultation on Saturday Morning Construction Works – Code of Construction Practice**

Dear Sir / Madam,

I am writing on behalf of the City Property Association (CPA). As you may be aware, the CPA is a membership body for the leading owners, investors, professional advisors and developers of real estate in the City of London. I attach a list of the 160 member companies we represent.

Thank you for providing the opportunity to comment on the principle of ending or revising the 'standard hours' working arrangements for Saturday (9am to 1pm) in the City of London. As an Association, we strongly oppose any changes to the current construction working hours, which are vital to ensuring the timely completion of developments and infrastructure projects in the Square Mile.

The City of London is Europe's leading centre for financial and professional services. There are over 24,000 businesses based in the City (2017), with the area contributing £49.2 billion to the national economy, equivalent of 23.4% of UK GVA (2016). There is market demand for a steady flow of new and refurbished office space that can accommodate a range of businesses, respond to ever-changing occupier demands and support modern working practices. Indeed, over the past three decades 70% of the office stock in the City of London has been redeveloped, as the area evolves to cater for changing workstyles, emerging sectors and makes the limited space in which it operates more efficient.

The City of London's success as a preeminent global business centre is reliant on its high quality and ever-evolving development pipeline. The City Corporation's own ambitious plans to dramatically accelerate its own cultural offer through Culture Mile, and the delivery of enhanced public realm and the creation of new public spaces, would all be at threat from any alterations to current construction working arrangements.





As an industry, we are committed to investing and developing high-quality schemes that create and sustain jobs in the City of London; deliver world-class buildings and public spaces; and contribute to the funding of infrastructure through CIL, S106 and other developer contributions. However, these construction projects often have tight timetables to meet occupation deadlines and ensure economic viability. Removing the option of Saturday morning from the construction timetable will have a major impact on the timely delivery, and as a result, the viability of commercial development in the City.

As well as the financial impact of restricting Saturday working, longer construction timeframes prolong the inevitable impacts of construction - such as noise and vibration - on local residents, workers, schools and visitors to the Square Mile.

Furthermore, the vast majority of pedestrians and cyclists that enter the area do so for work (483,000 people) between Mondays and Fridays. Despite much-needed interventions by the City Corporation to make local streets safer and healthier - such as Bank on Safety and the proposed Eastern City Cluster Area Strategy - the City's streets and public spaces can often become congested during the working week.

The option of well-timed Saturday deliveries of construction plant and materials, particularly for those items which require full or partial road closures (such as cranes), means that there is less of an impact on safety, air quality and traffic congestion during the working week.

We strongly urge the Planning and Transportation Committee to retain the current Saturday working hours for the City of London. These hours are standardised across London and cities across the country, areas with far higher residential populations than the City of London.

Yours sincerely,



Dan Scanlon  
Vice President of City Property Association



Corporate Members of CPA – July 2018

8build	Exigere Project Services Limited
Academy Consulting Solutions Ltd	Farebrother
AECOM	Farrer & Co LLP
Allianz Insurance	Foggo Associates Limited
Anstey Horne & Co	Foster and Partners
Arcadis LLP	Gardiner & Theobald LLP
Arup	General Demolition Limited
Ashurst	Gerald Eve LLP
Aukett Swanke	Gleeds
AXA	Gordon Ingram Associates
BBG Real Estate Advisers	Graham Construction Ltd
BDP	Great Portland Estates PLC
Beltane Asset Management	Greycoat Real Estate LLP
Bill Gloyn (Hon)	GVA
Bircham Dyson Bell LLP	Hayes Davidson
Blackstone	HB Reavis UK Ltd
BNP Paribas	Helical
Bougyues	Herbert Smith Freehills LLP
British Land	Hermes Real Estate Investment Management Ltd
Broadgate Estates	Hilson Moran
Brookfield	Hines UK Ltd
Buckley Gray Yeoman	Historic England
Buro Four	Hoare Lea
C C Land Management and Consultancy UK Limited	Hurley Palmer Flatt Ltd
Canary Wharf Group PLC	Hush Project Management & Consulting Ltd
Capita	Iceni Projects Limited
CBRE Ltd	Indigo Planning
City of London Corporation	Infinitus Property Investment
CMS Cameron McKenna Nabarro Olswang	Ingleby Trice
Colliers International	J Peiser Wainwright
Colville Estate Ltd	Jackson Coles LLP
CORE Offices Real Estate LLP	Jefferson Sheard Architects
Cundall	JLL
Cushman & Wakefield LLP (CPA)	JLT
Daniel Watney LLP	John Robertson Architects
DAR	Kajima Properties
Dechert	KJ Tait Engineers
Delancey Real Estate Asset Management	Knight Frank LLP
Deloitte Real Estate	KPMG
Dentons	Laing O'Rourke
Derwent London PLC	Landsec
DLA Piper UK LLP	LaSalle Investment Management
DP 9 Ltd	Legal & General Property
dRMM Architects	Linklaters LLP
EPR Architects Ltd	Lockton Real Estate
Evans Randall Investors	

# CPA

City Property Association

London Real Estate Advisors LLP  
M3 Consulting  
Macfarlanes LLP  
Make Architects  
Malcolm Hollis LLP  
McLaren Construction Ltd  
MDA Consulting  
Meinhardt (UK) Ltd  
Memery Crystal LLP  
Merchant Land  
Mishcon de Reya  
Mitsubishi Estate London Ltd  
Mitsui Fudosan  
MJP Architects  
MOLA  
Momentum Transport Planning  
Montagu Evans LLP  
Norton Rose Fulbright LLP  
Oakmont construction Ltd  
Oxford Properties  
PDP London  
Pell Frischmann  
Pinsent Masons  
Pringle Brandon Perkins + Will  
Proskauer Rose (UK) LLP  
Publica Associates Ltd  
QCIC Ltd  
Quadrant Estates  
Quantem Consulting LLP  
RadcliffesLeBrasseur  
Turner and Townsend  
U and I Group PLC  
W.R. Berkley Corporation  
Waterman Group  
Wedlake Bell

Ridgeford Developments Ltd  
Robert Bird Group  
Robinson Low Francis  
Rolfe Judd  
Rooks Rider Solicitors LLP  
RPS Group  
Savills  
Scott Brownrigg  
Second London Wall Project Management  
Sheppard Robson  
Simmons & Simmons LLP  
Sir Robert McAlpine Ltd  
Skanska UK  
Stanhope PLC  
Steer Davies Gleave  
Stiff+TrevillionArchitects  
TateHindle Ltd  
Taylor Vinters LLP  
Taylor Wimpey Central London  
Telereal Trillium  
The Mercer's Company  
Thomas & Adamson  
Tideway Investment Management Ltd  
Tishman Speyer  
TLT LLP  
TP Bennett  
Transport for London  
Treharne Architects  
Tuffin Ferraby Taylor  
  
Wilkinson Eyre  
Workman LLP  
WSP  
WYG

**Appendix Two: Public Consultation Questionnaire**



## Construction Work Activities on Saturday in the City of London

### Consideration of the impact of Saturday construction

The City Corporation is reviewing the existing ‘standard hours’ arrangements for Saturday mornings for construction type activities. We are asking for comments as widely as possible so that our elected Members are aware of your views when considering this matter.

### Introduction

The high level of development in the Square Mile, including major office redevelopments in the east and infrastructure projects has the potential to have significant environmental impacts on occupiers of nearby premises. Protecting City businesses, residents and other noise sensitive premises (e.g. schools) from noise and vibration impacts of construction sites is a necessary part of ensuring the City is an excellent place to live, work, learn and to do business.

“Noisy” work in this context is usually defined as being ‘where audible at the site boundary, or another location agreed by the City, and/or is likely to cause disturbance.’ The standard hours for design and planning purposes on sites and construction type activity are set out in the Code of Practice for Deconstruction and Construction (the Code) and can be found at [www.cityoflondon.gov.uk/noisestrategy](http://www.cityoflondon.gov.uk/noisestrategy), and include ‘quiet hours’ as stated below.

‘Standard hours’ currently permitted for **noisy** work are normally as follows:

- 08:00 - 18:00 hours (Monday to Friday);
- 08:00 - 13:00 hours (Saturday);
- No noisy working is permitted on Sundays, Bank or Public Holidays. Within the standard hours there are ‘quiet hours’ (normally 1000-1200 and 1400-1600 Mondays to Fridays) to protect commercial neighbours in normal working hours.

Outside ‘standard hours’ and during ‘quiet hours’ the following noise generating activities are not usually permitted where the activities are likely to cause disturbance:

- Cutting using power tools;
- Breaking out using power tools;
- Other noise generating activities, depending on the specific location of site and neighbours.
- The use of impact fasteners;
- The loading of heavy materials;
- Other noisy activities, depending on the specific location of site and neighbours, deemed unacceptable by Environmental Health Officers (EHO).

“Other noise generating activities” may depending on the circumstances include, for example, erection and dismantling of scaffolding and cranes, road resurfacing, vehicle movements.

Allowing some hours of noisy working on Saturdays can have the effect of reducing the overall time taken for projects to complete and for any disturbance to last for a shorter overall period. However, this needs to be balanced against amenity for those in the area.

Noisy work outside of the 'standard hours' or during 'quiet hours' may currently be permitted where this is aligned with the needs of local neighbours and City businesses. When requests from contractors for variations to hours of work are made the typical matters considered include the proximity to residential properties, places of worship or hospitals. Variations to these hours may be approved for works where impacts are expected to be low; are in locations where there are no affected neighbours or for safety, logistics or engineering reasons. Variations may be refused if the impacts on neighbours are considered high and cannot be mitigated or previous variations have not been fully complied with.

Saturday work for construction activity is considered the industry norm and has been accepted nationally. It helps in practical ways as, for example, fewer people and vehicles are on the street at weekends so there are less public safety implications with works, and it is easier to move large vehicles and loads on streets. Projects use the additional hours to carry out works which speeds up the completion of projects and reduces the length of impact on neighbours.

#### Impact of Saturday Working

The City has been asked to consider the principle of ending or revising the 'standard hours' working arrangements for Saturdays.

#### Consultation Questions

For the City Corporation's elected Members to assess this issue we request responses to the following question starting on the next page: -

All responses should be returned to

Address

Web link

By XXXXXXXXX

Thank you for your time and help.

1. Do you think the existing Saturday permitted hours for noisy construction work activity (08.00-13.00) should continue?

<u>Yes</u>	<u>No</u>	<u>No Opinion</u>
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2. Do you think that, unless permitted in emergencies or upon special application (such as for public safety reasons, or where local neighbours would prefer it to speed up the project overall), there should be no noisy works permitted on Saturdays?

Yes	No	No Opinion
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3. Do you think that if noisy construction works were not permitted on Saturdays, there should be an extra hour of noisy construction work permitted on Monday-Friday, from 18.00 until 19.00?

Yes	No	No Opinion
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If so, why?

4. Do you think that, unless permitted in emergencies or upon special application as in question 2, that noisy Saturday construction work should be partially permitted, e.g. specific times, locations, away from residential clusters, alternate weekends, etc.?

<u>Yes</u>	<u>No</u>	<u>No Opinion</u>
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i. If yes, please state what should be permitted:

5. Do you think you or your organisation would be affected if noisy construction work was not permitted on Saturdays?

<u>Positively affected</u>	<u>Negatively affected</u>	<u>Not affected</u>	<u>No Opinion</u>
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If so, How? Answer below

6. Are you or have you been affected by noisy Saturday construction work activity?			
<u>Positively affected</u>	<u>Negatively affected</u>	<u>Not affected</u>	<u>No Opinion</u>
If so, How? Answer below.			

7. Are you responding to this consultation as an individual or as an organization?	
<u>Individual (Q9)</u>	<u>Organization (Q8)</u>
8. If you're responding as an Organization,	
i. <u>What is the name and postal address of your organisation and the nature of its interest in Saturday construction works? Answer below.</u>	
ii. <u>How many people does your organisation represent? Answer below.</u>	
iii. <u>How many people were involved in taking the decision on how your organisation should respond to this questionnaire? Answer below.</u>	

9. <u>If you're responding as an individual,</u>		
i. <u>Please provide your name and postal address including your full postcode below.</u>		
ii. <u>Please tick all boxes that apply to you:</u>		
<u>Resident within CoL postcode</u>	<u>Owner of business within CoL postcode</u>	<u>Person working within CoL postcode</u>
<u>Person visiting destination in CoL</u>	<u>Person visiting destination in CoL</u>	<u>Please Circle appropriate</u>

10. <u>Does the issue of noisy Saturday construction works have any impact on you as an individual, group or organisation by reason of any of the following characteristics:</u>			
<u>Please Circle</u>			
<u>Age</u>	<u>Disability</u>	<u>Gender reassignment</u>	<u>Pregnancy &amp; Maternity</u>
<u>Race</u>	<u>Religion or belief</u>	<u>Sex</u>	<u>Sexual Orientation</u>
<i><u>If so, what is the impact? Answer below.</u></i>			

11. Do you have any comments, evidence or proposals (including alternatives) that you wish us to consider regarding the issue of noisy Saturday morning construction works and/or any of the questions asked above?

If so, please set them out below.

Many thanks for your help in responding to this consultation.

## Data Protection Privacy Notice

The City of London Corporation (City of London) is a registered data controller in respect of processing personal data under the relevant data protection legislation. This includes the Data Protection Act 1998, Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

The City of London's Data Protection Officer is the Comptroller and City Solicitor.

The City of London fully respects your right to privacy, and any personal information you provide as part of this survey, will be processed for the purpose of informing this consultation, and to contact you in relation to progress of the Saturday Construction working consultation, and other compatible public engagement activities.

Any personal data provided by you, for these purposes, using this survey, will be processed by Survey Monkey (the 'processor') on behalf of the City of London, and in accordance with the City of London's instructions, the requirements of the EU – U.S. Privacy Shield, and their own privacy policy (<https://www.surveymonkey.com/mp/policy/privacy-policy/>).

Where it is necessary to share personal data for these purposes, the City of London will ensure the appropriate technical and organisational safeguards are in place, with regard to the processing of personal data, and will ensure that personal data is not used by third parties for marketing purposes, without your consent.

The personal data processed by the City of London, and by the processor, for the above-mentioned purposes, is done so on the legal basis of your consent. Should you wish to withdraw your consent, at any stage, please put your request in writing to the City of London. Unless you withdraw your consent, the City of London will continue to process your personal data for as long as you remain

interested in the Saturday Construction working consultation.

You have the right to request a copy of your data, ask us to make changes to ensure that it is up to date, ask that we delete your information or object to the way we use your data. To do this please email [information.officer@cityoflondon.gov.uk](mailto:information.officer@cityoflondon.gov.uk) or write to Data Protection Officer, City of London, PO Box 270, Guildhall, London, EC2P 2EJ.

The City of London will not share your personal data with any other third parties, for any other purposes, unless legally obliged to do so. More information about data protection, and your rights in relation to personal data, is available from the website of the Information Commissioner's Office, [www.ico.gov.uk](http://www.ico.gov.uk).

