CLOCS Guide:
How to embed CLOCS into the planning process to improve community safety

CLOCS | Construction Logistics and Community Safety

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Contents

Terminology

CLOCS Standard – a national Standard that requires all stakeholders in construction to take responsibility for health & safety **within and beyond the hoardings**. Its mission - to ensure the safest construction vehicle journeys.

Primary goals:
- zero collisions between construction vehicles and the community
- improved air quality and reduced emissions
- fewer vehicle journeys - less congestion
- reduced reputational risk

Certain terms are used within the CLOCS Standard and in this guide:

CLOCS Champion – has co-invested in the programme and is responsible for actively implementing and ensuring compliance to the requirements within the CLOCS Standard. Where it is not possible to actively implement the CLOCS Standard straight away, the CLOCS Champion is responsible for communicating the organisation's intentions to implement together with related timescales and a dedicated point of contact.
Info: www.clocs.org.uk/page/Membership

CLOCS site monitoring – to improve site compliance and consequent safety, CLOCS Site Monitoring has been developed in partnership with CLOCS partners Considerate Constructors Scheme (CCS).
Info: www.clocs.org.uk/page/site_monitoring

Construction Logistics Plan (CLP) – the CLP focuses specifically on construction supply chains and how their impact on the road network can be reduced. A CLP differs from a Construction Management Plan (CMP) or Construction and Environmental Management Plan (CEMP) in that CLPs are developed earlier in the planning process and focus specifically on logistics. The information and planned measures identified in the CLP can also be included in the CMP or CEMP.

Direct Vision Standard – measures how much an HGV driver can see directly through their cab windows.

Fleet Operator Recognition Scheme (FORS) – a voluntary accreditation scheme for fleet operators which aims to raise quality and demonstrate which operators are achieving exemplary levels of best practice. The CLOCS Standard requires fleet operations to meet the requirements described as Silver in the FORS Standard.

Heavy Goods Vehicle (HGV) – commercial vehicles over 3.5 tonnes gross vehicle weight including abnormal and indivisible loads and engineering plant.

Stakeholders:

- **Regulator** – a transport, city or local authority that sets policies and planning conditions.
- **Client** – an organisation that procures the construction or operation of a site which requires commercial vehicle journeys; will typically employ a principal contractor to manage site operations.
- **Principal Contractor** – an organisation that is responsible for all site operations; will typically employ specialist sub-contractors.
- **Fleet Operator** – an organisation or part thereof which operates one or more commercial vehicle(s) to deliver procured services.

Vulnerable road user (VRU) – pedestrians, particularly children, older or disabled people, cyclists, motorcyclists and horse riders.

Work related road risk is abbreviated to WRRR

Section 1

Introduction

1.1 Purpose of this guide

The responsibility for setting safety standards in general around new developments should start with the Planning Authority (in conjunction with the Highway Authority in some cases), and should be proportionate and relevant to the scale of the development or project.

Regulators, specifically planning officers, play a vital and unique role in ensuring that the construction and eventual operation of developments is appropriate and does not have any significant negative effects on the surrounding area.

This document gives guidance and examples to assist. It explains how implementing the **CLOCS Standard**:

- benefits the local authority - addresses strategic plans and reduces complaints
- improves road safety, reducing congestion and emissions
- protects local communities

1.2 Who should read this guide?

- Local authority representatives responsible for influencing, making and implementing planning policy. Particularly related to freight, active travel, WRRR, and wider community safety.
- Industry stakeholders, who need to understand how planning can influence their day-to-day operations.

1.3 How do I get started?

The first step is to read through the **CLOCS Standard** which will give you an understanding of its scope, stakeholders, and specifically the role of 'regulators' – those setting policies and planning conditions.

This guide complements the **CLOCS Standard** and tells you how to introduce CLOCS into planning conditions.

The requirement to implement the **CLOCS Standard** will then cascade through developers' supply chains to ensure that WRRR is managed at all stages of development.

Examples of how local authorities have supported CLOCS are also provided.

For further advice or access to the CLOCS Standard, visit: www.clocs.org.uk

Section 2

How CLOCS can benefit your local authority and community

CLOCS contributes towards safer roads for all road users, including vulnerable road users such as pedestrians and cyclists. This has wider societal benefits. Supporting CLOCS demonstrates that as a planning authority, you are proactively addressing WRRR and seeking to promote the highest possible standards across the construction logistics industry. It represents a vital contribution to our corporate, social and community requirements.

The Royal Town Planning Institute has published a practice advice for their members "Planning for Construction Safety", which recommends the inclusion of CLOCS within planning conditions.

CLOCS brings the following benefits to local authorities and the communities they serve:

1. Safer roads leading to fewer incidents, fatalities and injuries

CLOCS was developed to address road safety concerns relating to collisions between construction vehicles and pedestrians, cyclists and other vulnerable road users.

These incidents have a significant human and environmental cost, affecting individuals, families and communities greatly. Preventing them has far reaching benefits.

[1] Barriers to Cycling: An Exploration of Quantitative Analyses, Parking, Ryley and Jones

2. Less conflict between different road user groups

When construction companies and drivers behave responsibly it reduces the likelihood of conflict between vulnerable road users and HGVs (as well as other smaller types of construction vehicle) and helps create a more relaxed road environment.

3. Environmental benefits through increased 'active travel'

Roads being perceived as unsafe is a frequently cited barrier to greater uptake of cycling[1], preventing many people from cycling at all. This reduces the likelihood of modal shift from private car to bicycle, resulting in greater emission of pollutants such as particulates. Air quality in many areas across the UK is contributing to cases of premature deaths.

CLOCS can help improve perceptions of road safety, as well as directly contributing to safer roads. This encourages more people to cycle, improving air quality and therefore the health of all.

In addition, modal shift from conventionally fuelled vehicles also reduces noise pollution and emissions, further strengthening the potential wider environmental benefits of adopting CLOCS.

4. Congestion

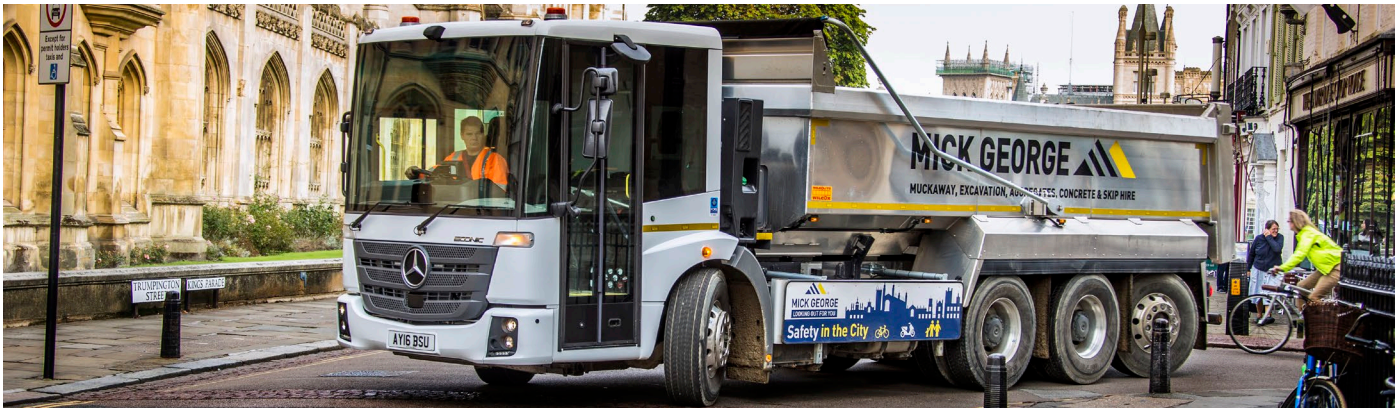
Modal shift from private vehicles to bicycles is also likely to benefit traffic flows. Decreased reliance on the car can help reduce congestion, which reduces idling of vehicles in standing traffic, aids economic growth and improves the amenity of an area.

5. Less opposition to development and complaints related to the construction process

The disruption in an area where a development is under construction can be significant. Developments may be opposed at the planning stage from those concerned that the construction will have a detrimental impact on the surrounding area. Complaints may also arise during the construction phase, such as noise, traffic, dust etc. CLOCS can help address all these by promoting good site management.

By improving the perception of the construction sector and safety associated with their operations, conflict between developers and those affected by construction activity can be reduced.

This can result in wider benefits, such as enabling a more open approach to development in a sensitive area.



Section 3

How does CLOCS fit into the statutory planning process?

Planning officers and departments can use CLOCS as a key tool for improving road safety.

This can be delivered in a number of ways including through Local Plans, Supplementary Planning Documents (SPDs) and Section 106 agreements.

It is important that there is a policy framework in place to ensure that CLOCS requirements are embedded in the planning process.

3.1 Local Plans

Local Plans are at the heart of the planning system and set out a vision and a framework for the future development of an area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for safeguarding the environment, adapting to climate change and securing good design.

They are also a critical tool in guiding decisions about individual development proposals, as Local and Regional Plans supported by supplementary planning documents (SPDs) include development management policies which help determine which applications will be granted planning permission.

It is not essential for the Local Plan to specifically reference CLOCS in order to develop CLOCS guidance or similar policy documents. However, it is important to ensure that there are borough-wide primary policies relating to road safety and supporting sustainable transport modes such as cycling.

Examples of local plans with scope to develop CLOCS related planning guidance:

1. Oldham Metropolitan Borough Council (Oldham MBC)

Oldham MBC's Development Plan Document – Joint Core Strategy and Development Management Policies

Policy 5 Promoting Accessibility and Sustainable Transport Choices:

The council will:

ensure the safety of pedestrians, cyclists and other vulnerable road users by ensuring appropriate highway safety measures and schemes are implemented as part of development proposals. Where feasible all pedestrian and cycle movements will be prioritised consistent with the road user hierarchy.

2. London Borough of Lambeth

The Lambeth Local Plan sets out planning policies for Lambeth to guide growth in housing and jobs, infrastructure delivery, place-shaping and the quality of the built environment over the next 15 years to 2030.

Policy T3 Cycling:

Lambeth will promote cycling through improvements to routes, giving greater priority to cyclists in the use of road space, reducing road danger from other transport modes and through improvements to signage and facilities.

Most up-to-date Local Plans incorporate similar primary policies to promote safe environments for vulnerable road users. In a city-region area, the freight/road safety/cycling teams may be in a great position to champion CLOCS.

When producing new planning policy documents there is nonetheless an opportunity to explicitly reference CLOCS as a means of delivering safer roads for all.

Sample wording for a planning policy including CLOCS:

Policy X: Safer roads for all

The council will:

require that all major developments, where there will be a significant impact on the public highway, implement the CLOCS Standard. This will necessitate a supporting Construction Logistics Plan that is appropriate to the scale of the development. These measures are to ensure the safety of the community, particularly pedestrians, cyclists and other vulnerable road users.

This provides a robust policy basis by which planners can request CLOCS as the standard met by construction sites and logistic operators working on a development.

The London Plan

Strategic planning in London is the shared responsibility of the Mayor of London, 32 London boroughs and the City of London Corporation. The Mayor has to produce a spatial development strategy (SDS) – which has become known as 'the London Plan' – and keep it under review.

Boroughs' local development documents have to be 'in general conformity' with the London Plan, which is also legally part of the development plan that has to be taken into account when planning decisions are taken in any part of London, unless there are planning reasons why it should not.

The London Plan provides the strategic policy basis for creating CLOCS aligned local policy to promote safe cycling environments.

Examples from the 2016 London Plan are given below to show how CLOCS fits into this policy:

Policy 6.9 (Cycling) in the London Plan sets out the following supporting text:

6.34A The quality and safety of London's street environment should be improved to make the experience of cycling more pleasant and an increasingly viable alternative to the private car. By providing safe and attractive routes that are easy to navigate people may be encouraged to cycle more, which will have health benefits for them and also help tackle climate change. The Mayor will introduce a range of road safety schemes and work with the delivery and servicing sector to improve driver training and vehicle standards, and to improve road safety of cyclists and pedestrians.

In addition, Policy 6.3 (assessing effects on development on transport capacity) below outlines the requirement for Construction Logistics Plans (CLPs) for certain applications, into which CLOCS requirements can be included.

Policy 6.3 (assessing effects on development on transport capacity)

6.3C Transport assessments will be required in accordance with TfL's Transport Assessment Best Practice Guidance for major planning applications. Workplace and/or residential travel plans should be provided for planning applications exceeding the thresholds in, and produced in accordance with, the relevant TfL guidance. Construction logistics plans and delivery and servicing plans should be secured in line with the London Freight Plan and should be co-ordinated with travel plans.

Transport for Greater Manchester - 'Made to Move'

Transport for Greater Manchester (TfGM)'s 'Made to Move' strategy is to grow cycling and walking mode share in Greater Manchester ("GM"). 'Crossing a road shouldn't require bravery' and CLOCS clearly supports their ambition. There is huge potential for growth in cycle journeys within GM, far beyond the current share of 2% of all journeys. The 'propensity to cycle tool' estimates that if GM residents were as likely to cycle to work as the Dutch (for trips of similar length and hilliness) commuter cycling rates would increase ten-fold, from 2.2% to 21.3% of all journeys.

In August 2019, TfGM embarked on a three-year co-investment programme to embed the **CLOCS Standard** across the region to ultimately reduce the amount of KSIs involving HGVs across the region and thus provide further incentive for residents of GM to uptake cycling as a form of transport across the region.

With a clear primary policy aimed at getting more people cycling and walking, the intent is to work with the Greater Manchester Combined Authorities to develop new planning policy documents that explicitly reference CLOCS.

3.2 Supplementary Planning Documents (SPDs)

SPDs may cover a range of issues (thematic or site-specific) and provide further guidance on policies that cannot be addressed in sufficient detail in the 'parent' local plan document. An SPD carries less weight than the development plan but is still a material planning consideration in planning applications. As an SPD cannot make new policies, it must link to a policy contained within the local development plan.

Reference to CLOCS within an existing or new SPD (e.g. for construction logistics, freight or vulnerable road user safety) should contain the following elements:

- an overview of CLOCS and how CLOCS can benefit the local authority and community
- the preferred mechanism for requiring CLOCS (e.g. section 106)
- type of development that CLOCS requirements should address
- advice on monitoring and support

Much of this detail can be drawn from this guidance document and the CLOCS website, and tailored to the individual requirements of the authority.

3.3 Section 106 Agreements (Planning obligations)

Planning obligations are used in the planning process to help manage the wider impact of development, usually through the use of a Section 106 legal agreement. Their use is governed by statutory tests to ensure that they are fairly or reasonably related to the development and acceptable in planning terms.

Obligations under Section 106 are legally enforceable and can impose wider constraints on the development that wouldn't otherwise be covered by planning conditions. A planning obligation could be used to secure compliance with the **CLOCS Standard** or deployment of a CLP, to allocate funds for monitoring, and ultimately used to enforce on the terms contained within it.

3.4 Construction Logistics Plan (CLP)

A CLP provides a framework to better manage all types of freight vehicle movements to and from construction sites. Having a management plan improves the safety and reliability of deliveries to a site, reduces congestion and minimises the environmental impact.

The **CLOCS Standard** requires authorities to ensure the planning process includes submission and approval of an outline and/or detailed CLP that addresses the main transport impact/risks in delivering a project safely before consent is granted. The Authority shall define the scope within their policies and must ensure inclusion of any development that is likely to generate significant construction-related traffic. CLPs shall be updated regularly to reflect any changes that occur.

Construction Logistics Plans (CLPs) are the golden thread that runs through the **CLOCS Standard**. Many local authorities are now requiring and working with CLPs but are missing the many additional benefits that the **CLOCS Standard** brings to all stakeholders and the wider community.

To promote continuity and efficiency, CLOCS strives to ensure widespread demand for and use of the CLOCS guidance and templates to facilitate safe and effective operations. Ultimately, the intention is to generate consistency of method and information captured. The resulting data used individually or collaboratively has the power to significantly improve productivity.

Training courses are delivered on an ongoing basis. CLOCS offers a number of free places per course to local authorities in order to drive wider understanding and application in the planning process.
Info: www.clocs.org.uk/page/construction_logistics

Case study: Camden Council

Camden Council has introduced a requirement that all CLPs (referred to as a Construction Management Plan) include an obligation for developers to ensure that the development is fully compliant with the **CLOCS Standard**. It should be noted that the **CLOCS Standard** does not just refer to vehicles but also operational site management practices.

By including this requirement in the Construction Management Plan pro forma Camden are able to encapsulate CLOCS in the planning process.

London Borough of Camden - Construction Management Plan Proforma v2.0 extract

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

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

Section 4

What developments can use CLOCS to improve road safety?

CLOCS can be applied to any type of development and it is the responsibility of the planning authority to determine the thresholds by which compliance with the **CLOCS Standard** shall be requested.

This section provides guidance on the types of development that planning authorities should consider when requesting CLOCS.

Residential, retail, offices, hotels, industrial and public sector developments such as schools and hospitals can all require a significant degree of construction activity to complete. The **CLOCS Standard** is therefore potentially appropriate for any development.

As such, it is recommended that consideration is given to the likely impact of the development rather than the type of development.

Works on dwellings such as basement developments can also have a significant impact on the surrounding area and generate high levels of construction activity.

Therefore, CLOCS shall be considered for:

- large scale developments of any type that are likely to have a long construction phase
- developments that are located in areas that are likely to be particularly sensitive to the movement of construction traffic (e.g. high-density residential area with congested roads)
- developments in areas where the number of vulnerable road users in the vicinity is high or where cycling and walking is prevalent
- developments close to junctions which have experienced incidents between construction vehicles and vulnerable road users
- any development that will require daily movements of construction traffic

Small scale residential developments (extensions, loft conversions etc.) may not require a CLP, due to the short-term nature of the construction phase and limited impact of associated works.

Case Study: Northumberland County Council

Another way of promoting CLOCS to developers is the use of application notes. Whilst not specifically a condition, it nonetheless highlights that CLOCS should be considered as part of a development. In Northumberland, planners added the following note to a planning decision relating to the extension of a horse bedding plant in the village of Detchant, the approach road of which intersects with a national cycle way.

Notes to Applicant

1. Your attention is drawn to the guidance and standards prepared by Construction Logistics & Community Safety (CLOCS) with regard to the Traffic Management Plan and vehicular traffic to and from the site.

This demonstrates that the promotion of CLOCS through planning can be achieved in a number of ways and associated efforts need not be resource intensive for planners. It also shows that rural planning authorities can play a key role in supporting initiatives aimed at improving the safety of vulnerable road users, especially in areas where HGVs are servicing industrial units, quarries and timber plants in the vicinity of villages and walking / cycle routes.

Section 5

Monitoring and support

The **CLOCS Standard** states that authorities shall require a project to have effective CLOCS monitoring mechanisms in place and keep the CLP up to date. Monitoring and support play a key role in ensuring that developers fulfil their obligations under the **CLOCS Standard** and the specifics detailed in the CLP.

Monitoring

It is acknowledged that the resources of planning authorities are often stretched and officers may focus only on breaches of planning conditions/obligations that have been reported or become apparent due to the significant impact that the development is having.

There are a range of different methods that officers could employ to support day-to-day monitoring activities including on-site observations, physical checks and formally incorporating associated activities into existing enforcement roles.

The **CLOCS Standard** ensures proactive measures are in place and provides tools for effective implementation. Requirements of developers for site monitoring enables planning officers to request sight of the CLOCS site monitoring reports. This compliance performance data can be used to replace or supplement authorities' efforts to monitor adherence to planning conditions/obligations. This strategy maximises planning authorities' resources.

5.1 CLOCS Site monitoring

To help Champions understand and improve site compliance and consequent safety, CLOCS Site Monitoring has been developed in partnership with CLOCS partners Considerate Constructors Scheme (CCS). Overall scores and reports can be used as evidence to regulators and clients of compliance.

There are 3 mechanisms available to support effective site monitoring:

1. A formal site visit by the CLOCS team. Together with submission of 'self-assessment' checklist, this provides a site score and a detailed report capturing good practice and recommendations for improvement.
2. An advisory site visit by the CLOCS team. Together with submission of 'self-assessment' checklist, this provides a detailed report capturing good practice and recommendations for improvement.
3. Self-assessment checklist

The self-assessment checklist reflects the requirements of the **CLOCS Standard**, as they apply to the site. The questions look to establish compliance and capture performance beyond minimum requirements as they seek detail on all elements described. This checklist helps principal contractors to understand their level of compliance.

As well as looking to establish whether the Standard is being met, the assessment and monitoring process aims to recognise best practice and raise standards across the industry. The CLOCS site monitoring team provides a detailed report containing helpful advice on areas for improvement and provides scores in 11 key areas.

For more information visit www.clocs.org.uk/page/site_monitoring

The **CLOCS Standard** requires all fleet operators to meet the requirements described as silver in the FORS Standard. Desk-based checks can be undertaken using the 'Who's on board?' page of www.fors-online.org.uk. Site monitoring requires evidence that vehicles/drivers are checked by the site operations team. The CLOCS gate check poster is also a helpful resource available online.

5.2 Breaches

Complaints from the public are likely to relate to the routing and the number of construction vehicles in a particular area and associated nuisance – a well-devised CLP should reduce/remove this hassle.

If an incident does occurs between a vulnerable road user and a construction vehicle, an assessment on the vehicle involved should take place. If it is a vehicle associated with a CLOCS-aligned construction site and it is demonstrated that they were not behaving in a compliant manner, then the developer should be notified. CLOCS requires principal contractors to obtain information on all collisions that result in harm that occur on journeys associated with the project and report to the client.

Authorities shall have processes in place to manage instances of a breach and shall clearly communicate the actions required of the project team.

Case study: Croydon

London Borough of Croydon – O2D App & CCTV monitoring

Croydon has developed a new app to compliment a number of other measures for the control of construction traffic. Sites are obliged to use the (free) app as part of the planning conditions for redevelopment sites. Incoming vehicles are tracked by the site before they arrive, and if the site is full or the vehicle is set to arrive during a restricted period, vehicles can be redirected to a holding area and called in when space is available. The objective of this app is to control compliance, remove the need to send vehicles away and so reduce congestion, pollution and inefficiency on-site.

Croydon also utilises CCTV cameras to monitor and ensure compliance with the CLP conditions. These cameras are funded by the developers and are configured to observe the site entrance(s). The purpose of these cameras is to allow remote checks on sites by LA officers and to allow for incidents reported by members of the public or other offices, regardless of time of day, to be investigated and appropriate action taken. This also provides a degree of security for the sites themselves both in terms of recording any potential illegal activity but also maintaining a good quality record of any incidents that may occur in the vicinity of the site entrance involving construction traffic.

5.3 Supporting developers and contractors

There are a number of alternative approaches being undertaken at different local authorities to support the safety of pedestrians, cyclists and other vulnerable road users.

For example, **Camden Council** has officers dedicated to supporting the CLOCS programme. They provide advice, give presentations and are available for any queries. They also ultimately help monitor compliance with the **CLOCS Standard** and enforce the CLOCS requirements encapsulated in the CMP.

In addition, the **City of London Corporation** promotes the Considerate Contractor Scheme, which aims to improve the safety of all highway users in the area. They work with developers in the City to encourage safe working practices.

Further support:

The CLOCS website has an extensive Resources section and a dedicated page to support regulators.

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clocs.org.uk