

Mrs Lesley Stevas



Planning Application 2024/2928/P  
Site Address: 30 Grove Place London NW3 1JR

I strongly object to this planning application.

I mainly refer to the construction management plan. This application does not realistically assess working access and storage and movement of spoil and material from this excavation. The project will create a significant danger to local roads and pedestrians.

Camden Planning Guidance, Basements (January 2021) says:

"5.3. The Council will generally require a construction management plan for basement developments to manage and mitigate the greater construction impacts of these schemes. Construction management plans will generally be required for schemes on constrained sites, in conservation areas, on sites adjacent to a listed building, or in other areas depending on the scale of the development and the conditions of the site. Construction management plans should cover the following:

- provisions for phasing;
  - provisions for site management, safety, and supervision,
  - management of construction traffic and parking;
  - management of noise, vibration, dust, and waste;
  - provisions to ensure stability of buildings and land;
  - provisions for monitoring movement, and
  - provisions for a construction working group (for projects where there will be a need for ongoing consultation with the affected neighbours through the construction phase e.g. long, complex projects).
- Camden Planning Guidance: Basements 41 ."

The applicant has used the Camden council proforma for the management plan, which is useful but highlights strong concerns over how the project will negatively impact neighbours and the immediate area.

**Management of construction traffic and parking.**

Part 18 of the CMP says:

18. Traffic routing: "Clients shall ensure that a suitable, risk assessed vehicle route to the site is specified and that the route is communicated to all contractors and drivers. Clients shall make contractors and any other service suppliers aware that they are to use these routes at all times unless unavoidable diversions occur." (P19, 3.4.5)

And says:

“Consideration should also be given to weight restrictions, low bridges and cumulative impacts of construction (including neighbouring construction sites) on the public highway network. The route(s) to and from the site should be suitable for the size of vehicles that are to be used.”

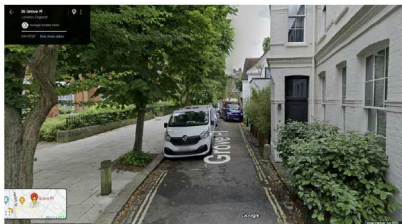
The CMP says:

“Access to site will be via the A502 Heath Street, East heath Road, Holford Road, Cannon Place, Christchurch Hill, right into Grove Place. Exit from site will be Right into Well Road, East Heath Road, returning to the A502”

There is no risk assessment of the route, here is mine: Grove place is too narrow and unsuitable for construction & delivery vehicles, especially with overhanging trees and the constant use of the parking bays, please see google street view images below:



This is the “Christchurch Hill, right into Grove Place.” Part of the description, note the overhanging branches from trees; these will get damaged from delivery vehicles.



This is looking north along Grove Place. Note the concrete bollard on the right which will prevent access by larger vehicles when the parking bays are in use. Creating a high likelihood of damage to parked cars and property.

The CMP says “All drivers will be instructed to switch off engines when on stand on the site at any time . Apart from the sole vehicle permitted, there will be no waiting on the highway in the vicinity of the site allowed at any time” that “Narrow-bodied vehicles (i.e. Nissan Cabstar. Mitsubishi Fuso, etc. with a body width less than 2m) will park in the suspended bay opposite. Spoil and materials will be manually loaded” and “Given the nature of the site and that all vehicles will be narrow-bodied and use the standard parking bays, traffic marshals will not generally be required”

A Nissan Cabstar or Mitsubishi Fuso will not be able to get through Grove Place when other parking bays are being used by local residents and even these vehicles will be too wide for the existing parking bays, which will mean they will in effect block the highway or create a hazard and a danger to the highway and adjacent trees.

Furthermore, project feasibility depends entirely on being able to use the parking bays that are directly adjacent, and will involve significant machinery and spoil for the basement excavation, what happens when the parking bays adjacent are being used by other residents or when cars are parked either side of the bay? It will be impossible for a delivery vehicle to parallel park (even narrow bodies ones). The only solution will be to suspend parking along on the street, which will be unfair and likely prohibited.

The risk to the highway and residents is **SEVERE** and there are no feasible mitigating options available.

**Other high / severe risks:**

There are some adjacent street hawthorn trees on the corner of Grove Place and Christchurch Hill which have recently died. I saw workmen from another project at 34 Christchurch Hill, Camden Cottage, that had more working space and better access than this proposed project, store materials against the trunks of the hawthorns just before they died. I have seen what looked like cement washings being discharged into the tree pits by workmen at No 34. The submitted tree report for this application at 30 Grove Place shows tree protection measures that whatever is specified will not be able to prevent the same harm to street trees in Grove Place which will likely be inevitable considering that there is no space for storage of materials and no real access. The unrealistic and unfeasible construction manage plan will cause an overspill of issues into the immediate highway including trees despite any physical tree protection that my or may not be erected.

There are already many large pot holes in the road and to other roads in the vicinity. The volume of lorries that will be employed in this project will only damage the road surfaces even more.

**Conclusion: The application should be refused.**