

Proposed development at 85, Camden Mews 2014/4726/P

Objections to Construction Method Statement

1. This application is for demolition and major redevelopment on a narrow one-way residential street, Camden Mews. The Method Statement acknowledges at p. 3 that the scale of the development is so large that it cannot be serviced by lorries making deliveries to and collections from the site itself. That is obviously correct.
2. Instead the applicant proposes using the end of an adjoining road, Canteloves Road, as a “site base”. Materials will be delivered and stored there; there will be a site office; and concrete will be mixed there (see p. 8 section 6). It is proposed that a 1-tonne loader will “shuttle” between the “site base” and the work site itself. See generally pp. 4, 6, 8, 10 and 11.
3. The Method Statement misleadingly states that this has been agreed with the Council’s Network Co-ordinator Mr Hamilton. Mr Hamilton has informed me that the only discussion was of the possible use of some highway space for staff welfare facilities. There was no discussion of all the other uses (see para 2 above) and no agreement of any kind. Nor did the applicant inform Mr Hamilton that it has its own land which could be used for these purposes (see below).
4. The proposal would be completely inappropriate. It would be disruptive in the extreme to have a site base on Canteloves Road. The effect would be to extend the disruption, dirt and danger of the building site across the whole section of the Mews between the building itself and the junction with Canteloves Road.
5. The proposal also assumes that the 1-tonne loader will “shuttle” along the Mews. That must mean that it is proposed to drive illegally, and very dangerously, from the site to Canteloves Road, against the one-way system. Since that cannot happen, the proposal is completely impractical. It cannot be suggested that the 1-tonne loader would follow the complicated route around the one-way system via York Way etc to remove all the demolished building plus the 850 tonnes of earth required to excavate the basement.
6. A particularly odd feature of the proposed “Site Base” is that there is no need for it at all. The applicant actually owns all the land from 85 Camden Mews through to and including 236 Camden Road, which it is in the process of redeveloping. Outside 236 Camden Road is a pre-existing and amply-sized Red Route parking bay. An obvious option would be to have deliveries and collections in that parking bay. Materials and welfare facilities could be stored in the large garden between 85 Camden Mews and 236 Camden Road or indeed in the garden at the front of 236 Camden Road. There is a passageway to the side of 236 Camden Road which would allow for movement of materials, including by a quiet electric

trolley. It is possible that this might cost a little more or interfere with the developers' marketing of their new flats but that is surely a price they can be expected to pay, rather than impose even more disruption on their neighbours by using a section of Camden Mews as an extension of their construction site. If the applicant is unwilling to use its own land for these purposes, then that is all the more reason why it should not be able to use the street.

7. I have previously submitted an independent expert engineer's opinion which drew attention to numerous specified deficiencies in the application concerning the risk of damage to my adjoining property. No details are given in the Method Statement about the actual methods to be used, despite the warnings in that opinion. This is alarming.
8. As far as concerns disruption to neighbours from the demolition, excavation and construction processes, the Method Statement is extremely vague. Almost no specifics are given as to what processes will be used, how long they will take (although an excessively long working day of 8 am to 6 pm is proposed), or what actual precautions will be adopted. Unenforceable general assurances are given about using quiet methods "where possible" or "practicable". It is however clear that heavy equipment will be required for an unknown period: see the references to a 1.5 tonne excavator, heavy drilling, and conveyor belts.
9. The only specific mitigation suggested is to put up a hoarding around the entire site. This suggestion is physically unachievable. With the exception of the west-facing wall which leads into the garden at the rear, the outer walls of the proposed new house will run along the boundary of the applicant's land. On the Mews side, the outer wall leads directly onto the pavement. There is no place for a hoarding without encroaching on the public pavement and driving pedestrians into the street. On the south and north, the outer walls again mark the perimeter of the applicant's property. There is no room for a hoarding.
10. The reality of this proposal is an attempt to over-develop this small plot of land. The applicant has failed to show a realistic construction method. The Construction Method Statement is an inadequate document which on its own justifies refusing planning permission.

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