

Dear James

You may remember we spoke about this planning application in the summer when the first tranche of documents were submitted. We also discussed the possibility of our meeting on site once you had reviewed this Applicant's proposals but I have not heard back from you.

One of the key concerns for the Fitzroy Park Residents Association and the Highfields Grove Management Company relates to a corridor of 10 high amenity trees that border the Hexagon cul-de-sac and the unacceptable construction impacts on them that would be caused by this proposal. Of these 10 trees, all owned by HGMC and located on their private land, two are Category A and four are Category B.

Having now reviewed the amended documents it would appear that this Applicant's consultants (Crown and Motion) together continue to refuse to survey or take any account of these trees and the construction impacts on them at this time. Their argument is that mitigation can be agreed post-consent or by condition. This position is contrary to British Standards and, as I understood it, is contrary to your stated position as Camden's Tree Officer for this case when we spoke.

The stark reality is that this concrete cul-de-sac is 2.8m at its narrowest with these trees and other vegetation located directly along the verge. Despite reviewing the CMP in light of these dimensions, Motion Transport have proposed reversing smaller HGVs (if available) that are still 2.9m wide down the entire length of the access route. You should note that wing mirrors cannot be folded in as they are needed to complete these manoeuvres. The consequence? There is no safety buffer or allowance and these trees are highly likely to be damaged above ground and certainly below ground by these vehicle manoeuvres.

As you can see from the screen shot of Landscape Planning Ltd drawing number 689251-01 below, a survey commissioned and paid for by FPRA & the Residents, not the Applicant, the RPAs of all these trees encroach under the concrete cul-de-sac. Alan Baxter Associates who provided engineering advice for FPRA, have estimated that the total weight loading of the HGV traffic will be in the region of 5,000 tonnes including new concrete deliveries. These will pound the Hexagon cul-de-sac which has a CBR ratio of only 4%, a test also commissioned and paid for by FPRA, not the Applicant.

What Crown, the Applicant's arboricultural consultant has said is that this HGV traffic will not affect the trees because i) tree roots do not grow under roads because its too dark, and ii) in any event the use of ground guards will mitigate any degradation of the concrete surface. Yet Crown do not provide any scientific evidence to support their arguments nor have they or Motion undertaken an engineering study of the made ground beneath the concrete to determine its weight bearing capacity. Such an engineering review is a requirement of ground guard manufacture, clearly detailed in their terms and conditions, because ground guards specifically omit mitigation of compaction at depth from their benefits. The only way to mitigate compaction of depth is to re-engineer the road to an appropriate CBR level and then top with ground guards to protect the surface.

This position, of course, misses the point entirely.

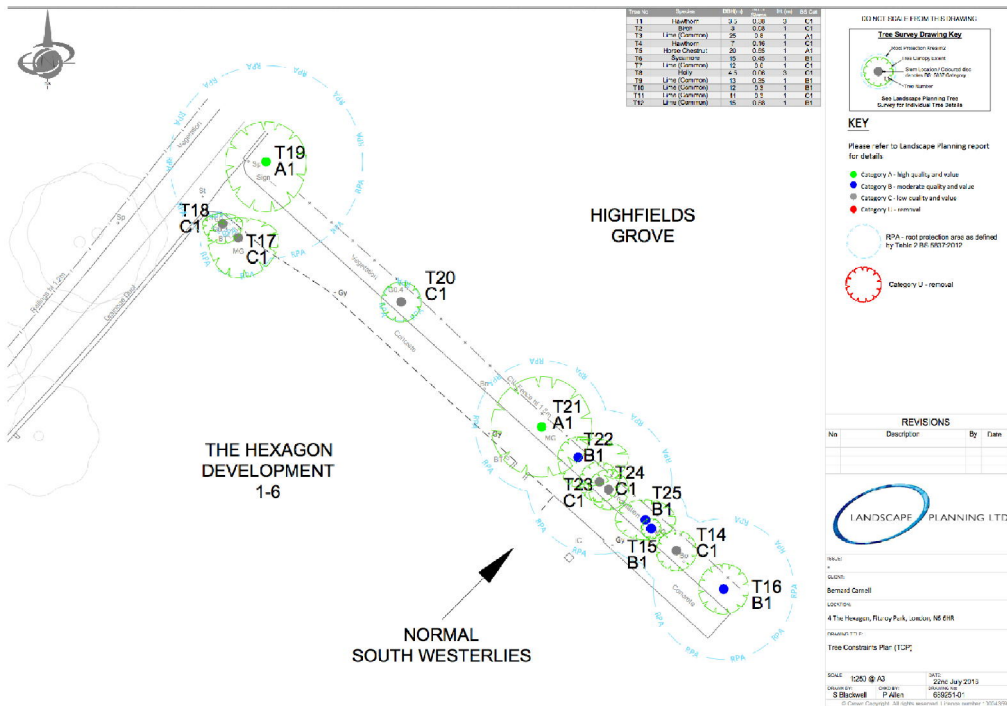
It is the compaction of the sub-soil under the concrete surface where well-regarded research has proven tree roots are found in abundance that is the nub of the issue here. The intensification of use by construction traffic along this tiny cul-de-sac and compaction of the soil and tree roots at depth poses a significant and real risk to the long-term

sustainability of these trees. Even if ground guards were deemed appropriate for surface protection, the cul de sac would need to be re-engineered to cope with the proposed increased weight loading, so the tree roots will either be damaged by this process or by uncontrolled compaction. Either way the long-term sustainability of the trees will be harmed which is clear grounds for refusal of this planning proposal.

On a separate note, although there is now the intention to retain the Yew tree in the rear garden of the development site, residents remain concerned at how the RPA will be protected as it appears not to have been detailed in the proposals.

Given these circumstances, I would be grateful if you would please contact me so that we can discuss these issues with the HGMC in situ. Thank you. In the meantime I have attached those relevant documents commissioned by FPRA for your reference.

With regards
 Karen Beare
 Chair - FPRA



2. Landscape Planning - July report

 [68925_2016...pdf \(993 KB\)](#)

3. Landscape Planning November report



[0829_001.pdf \(272 KB\)](#)

4. Soil Consultants CBR testing



[Soil Consult...pdf \(2.9 MB\)](#)

5. WSP July report



[4 Hexagon ...b.pdf \(47 KB\)](#)

6. WSP November report



[4 Hexagon ...6.pdf \(46 KB\)](#)