

Your Ref: n/a

Our Ref: 70024705

16th November 2016

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Subject: No. 4 Hexagon, Construction Traffic Management Plan

WSP | Parsons Brinckerhoff have been appointed by the Fitzroy Park Residents Association (FPRA) to review and advise them on the suitability and acceptability of the draft Construction Management Plan (CMP), dated 26th May 2016, submitted by Motion for a residential development at No. 4 The Hexagon, London. London Borough of Camden (LBC) planning ref 2016/3252/P.

The following letter has been prepared subsequent to an initial technical review undertaken by WSP | PB of the CTMP, refer to WSP | PB letter dated 28th July 2016, and following further information submitted by the applicant in support of the proposed development.

The following letter should be read in conjunction with the above and has been prepared to address the response of Motion, the applicants appointed consultant, to our previous observations and identified issues in the original CTMP.

The main points raised in our letter dated 28th July 2016 related to the following:

- Base Data & Information
- Construction Vehicle Swept Path Analysis;
- Construction Vehicles;
- Cumulative Traffic Implications;
- Allotment Parking; and
- Existing Pavements Durability & Integrity

Before setting out our observations on the applicants responses and provision of further information we would like to remind LBC the burden of proof rests with the applicant and their appointed consultants. It is incumbent on them to demonstrate the proposed facets of the development including its construction and operation do not present a direct or indirect detrimental and irreversible impact on its neighbours and the local amenity. At the present time, in terms of Highways & Transport related issues, based on the information we have seen, we feel this obligation is still not being met.

It would also appear there is an over-reliance on the use of planning conditions to secure appropriate mitigation for any potential development or construction impacts. In some instances this is wholly appropriate, however for the majority the necessary investigation, survey or appraisal could be undertaken to ensure any findings capable of influencing the proposed development are understood and do not result in the aforementioned uncontrolled implications.

If these obligations cannot be met it leads us to question whether the nature of the proposed development is wholly appropriate in this location.

Construction Vehicle Swept Path Analysis

1. We note the Motion swept path analysis, refer to drawings TK04, still indicates the 6.5m 'skip' type construction vehicle reversing from the Hexagon into the sites demise will clash with existing vegetation bordering the Hexagon opposite the site entrance. Such vegetation would need to be

removed or a larger access into the site created, it is unknown if the applicant has secured permission for either such requirement.

2. Furthermore, if the boundaries shown are correct, the swept path analysis indicates rights of access would be required over the land associated with Property No. 3. Again it is unknown if the applicant has secured such permission.
3. Whilst the applicant has accepted a condition to limit the size of construction vehicles no detail on how this will be enforced has been provided.

Previous experience of the FPRA in the use of conditions to limit construction vehicle sizes has been unsuccessful as either this is not relayed to suppliers, or when it was routinely ignored by suppliers and any contravention was subsequently not enforced by either the contractor or LBC.

Therefore, based on the previous experiences of FPRA, we have limited confidence that a condition limiting construction vehicle sizes will be sufficient enough to deter inappropriate construction vehicles being deployed and ultimately be enforced by the applicants contractor or LBC.

4. Notwithstanding the above, we note the change in construction method for the concrete, which can be understood however this brings additional concerns in the use of The Hexagon and its appropriateness.

The typical detail provided by Motion states the Minimix vehicles are 2.94m wide but this exceeds the width, measured as 2.9m, of the Hexagon at its narrowest point and would contravene any related planning condition.

5. The contravention of any condition aside, given the intention is to reverse these vehicles down the Hexagon the vehicles side mirrors will need to be extended (not retracted). Such manoeuvres will therefore prove difficult and there is a high likelihood if not certainty, these vehicles will overrun the kerb edge and collide with existing vegetation.
6. We also note the Minimix company – a subsidiary of Tarmac - also provides the following caveat on their concrete deliveries "We cannot be held responsible for any variation in size of the actual delivery vehicle due to the numerous and varied Minimix trucks within our fleet". Unfortunately this reduces the FPRA's confidence in the ability of the applicant's contractor to control & receive condition compliant deliveries.

Alternative Routing

7. Within SOUP Architects latest representation we note they offer The Grove as an alternative construction vehicle route to Fitzroy Park to access the site. No detail or analysis of this alternative route is presented by SOUP so it is difficult to appreciate if they have fully considered the suitability and if it offers a viable and appropriate alternative for the proposed developments needs.

In the absence of any assessment, whilst we can see how it may address the issue surrounding the displacement of allotment parking, we note the section of Fitzroy Park leading to and from the Grove appears equally constrained, tortuous and potentially challenging for construction vehicles. Furthermore the alternative route doesn't address or resolve the majority of the issues which surround the use of The Hexagon.

Until the applicant provides a sufficient appraisal of this section of Fitzroy Park it cannot be considered by the FPRA further and should not be accepted by LBC either.

Cumulative Traffic Impact

8. We respectfully disagree with Motions view on the ability for assessing the cumulative traffic impacts. This is a not uncommon requirement which can & (where sensitivities or known issues exists) should be assessed based on the planned construction programme and the presumption of a successful consent to fully understand any potential issues and mitigation which need to be provided for by the applicant. This is reinforced by the recommendation in LBC's own guidance.

9. This is particularly relevant given the number of developments planned to be occurring simultaneously on Fitzroy Park and The Hexagon therefore much greater consideration needs to be given to enforcing a planned and coordinated logistics plan for the proposed developments.

Also particularly pertinent for Fitzroy Park where if not properly addressed indiscriminate arrivals of construction vehicles could create traffic and access issues for residents, patrons of the bowling club and the allotments throughout the duration of the developments construction activities.

Allotment Parking

10. Adequate consideration and a workable solution for the displacement of the dedicated and permitted parking arrangements on Fitzroy Park for patrons of the allotment. As we understand parking for the patrons of the allotment is managed by means of permit and parking expressly prohibited on Fitzroy Park outside the properties of neighbouring residents.
11. The time of year is largely irrelevant as any alternative parking arrangements should mirror the existing or the number of patrons with permits which could potentially require parking.
12. It is unclear what rights, if any, the applicant has to suspend the existing allotments on street parking spaces and therefore if this mitigation measure is in their 'gift' and as such can be relied upon.
13. Furthermore any evidence of any dispensation or agreement by neighbouring residents to relax the current parking restrictions for patrons of the allotment in order to suspend the existing bays should be secured at this stage and demonstrated as part of the CTMP. No evidence has been provided.

Existing Pavement Durability & Integrity

14. Motion's conclusion on the suitability of the existing pavements structure is not supported by sufficient testing, analysis or calculations. It therefore is assumed to be speculative until proven otherwise.
15. We concede it is not inconceivable that the existing pavement structure is sufficient to support construction vehicles. Furthermore a reinforced concrete slab of the dimensions stated may be sufficient to cater for the imposed traffic loads however the unknown quantity is the made ground beneath.

Made ground, is inherently unpredictable and its performance can be varied, therefore any conclusions drawn on its performance should be substantiated with in-situ testing, particularly as the made ground has not been classified in accordance with the Specification for Highway Works. Testing beneath this medium does not provide the necessary information to determine it is sufficient. To support the view of Motion CBR testing should be undertaken beneath the concrete slab on top of the Made Ground.

16. We would agree, given the presence of the reinforced concrete slab within the existing pavement structure, the use of ground guards on top of this to spread the imposed load would most likely be superfluous. The key issue is ascertaining and if necessary improving the sub-surface strength of the existing pavement structure to mitigate any potential construction vehicle impacts.

Therefore a more thorough assessment is still required on the existing condition of The Hexagon pavement to enable an adequate mitigation strategy to be put forward.

17. A visual inspection of the existing concrete slabs shows evidence of sub-surface movement possibly due to ground creep, consolidation of the sub-strata (in this case most likely the made ground) or a host of other factors. This is denoted by cracks and differential settlement across the concrete slabs and given their age is not unexpected.

However it is not unreasonable to suspect these existing pavement failures could be exacerbated through the repeated passing of construction vehicles and, as a result, potentially compromise any existing tree root systems present within the sub-strata. Therefore post construction remediation may not be a viable option to safeguard the existing trees.

18. The Landscape Planning arboriculturalist letter dated 10th November 2016 should be referred to for the implications of the proposed development on the existing trees. The implications are not considered in this letter however we support their conclusions and the view a sufficiently detailed survey should be undertaken and submitted as part of the planning application.

Summary

WSP | PB have undertaken a further review of the additional information presented in relation to the The Construction Management Plan for No. 4 The Hexagon on behalf of the Fitzroy Park Residents Association.

This letter is prepared as an addendum to WSP | PB's initial letter dated 28th July 2016.

In our professional opinion, greater detail on certain aspects of the CMP are still to be provided, in particular construction vehicles proposed, parking and pavement improvement / protection.

We therefore would strongly recommend the CTMP is revisited by the applicant, addressing the points we have raised, before any decisions are taken on about the suitability of the proposed development and the impacts on the amenity of the surrounding area.

Prepared by:



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