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100 Avenue Road – Comments on the proposals submitted by Essential Living (Swiss Cottage) Ltd to discharge condition 31 [Application no.2016/6699/P] relating to the proposed works to demolish the existing building and to the redevelopment of a 24 storey building including a basement, 184 residential units and flexible commercial and community use spaces [Application no. 2014/1617/P].

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Executive Summary

The purpose of this document is to review the various documents, reports, drawings, designs, method statements, etc., that form part of the submission made by AECOM in a document entitled 'AECOM Report – 100 Avenue Road – Submission for Discharge of Planning Condition 31'.

The report has been prepared on behalf of a number of local groups and resident associations that have an interest in the proposed project.

The report also looks at the submission in relation to the requirements of the discharging of condition 17 regarding the proposed HS2 rail link.

The key criteria that need to be shown in the submission are that the proposed scheme is fully detailed in terms of the permanent works to the basement, all temporary works designs are completed and the method statements fully thought through. Much of the information provided is described as 'concept' stage and in some sections of the various reports it states that no work has been carried out.

The information provided in the application is in our view far short in terms of content and detail as to what is properly required in terms of discharging condition 31 as drafted.

Whilst the application is for the discharge of condition 31 only, it is my opinion that condition 17 must be considered and discharged in parallel with condition 31. The condition 17 requirements for HS2 are similar and these too have not been met. There is also no evidence that the proposals have even been put before the HS2 team.

The Construction Management Plan is preliminary and part of it is generic. It requires far more work in order to make it far more site specific. Issues such as traffic management need far more detail given the sites location so close to an important artery in London.

The documentation does not fully meet the requirements of Camden's guidelines in terms of the information that is required to be provided when making a planning application for a basement.

1. Introduction

This report has been prepared for several groups in the Swiss Cottage area of London. These include Save Swiss Cottage, SSCAGG, CAASP, CRASH and a number of Residents' Associations based in the area. These include the Elsworthy Residents Association, the Netherhall Neighbourhood Association, Cresta House Residents Association (CHRA), Winchester Road Residents Association (WRRRA), the Eton Avenue Housing Association (HA) Group, Belsize Residents Association (BRA), Centre Heights Residents Association and the Belsize Conservation Area Advisory committee (BCAAC).

1.2 The purpose of the report is in response to the planning application number 2016/6699P that was submitted to The London Borough of Camden on 1st February 2017 by Essential Living. The planning application deals with the proposal to redevelop the site at 100 Avenue Road, London NW3 3HF. The works include the demolition of the existing building and the construction of a 24 storey building comprising a basement, a total of 184 residential units and flexible commercial and community areas.

1.3 The report will address the specific requirements that are required to be carried out in order to discharge Condition 31. Specifically, the requirement is this:

*Before development commences **detailed design and assessment reports and outline method statements** (in consultation with London Underground) for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), shall be submitted to and approved in writing by the Local Planning authority, such reports shall: - provide details on all structures over and adjacent to LU assets*

- *accommodate the location of the existing London Underground structures and tunnels*
- *accommodate ground movement arising from the construction thereof*
- *mitigate the effects of noise and vibration arising from the adjoining operations within the structures and tunnels and mitigate against any EMC (Electromagnetic Compatibility) issues arising from the construction of the new plant.*

*The development shall thereafter be carried out in all respects in accordance with **the approved design and assessment report, method statements and subject to an agreed monitoring strategy, and all structures and works comprised within the development which are required by the approved design statements** in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.*

1.4 It is acknowledged that the first part of the above clause under 1.3 implies that this applies to the London Underground structures, but we are of the view that this clause should **apply to all nearby structures**. The latter section of the clause above indicates that it does apply to neighbouring properties.

- 1.5 The report will also address the specific requirements that are required to be carried out in order to discharge Condition 17. We are of the view that the requirements of HS2 are not dissimilar to those of London Underground and hence the discharge process should be in parallel.

Specifically, the requirement is this:

(i) Works below ground level shall not start until detailed design and construction method statements for all of the ground floor structures, foundations and basements and for any structures below ground level, including piling (temporary and permanent) have been submitted to and approved in writing by the Local Planning Authority. These shall:

- *Accommodate the proposed location of the HS2 structures and tunnels.*
- *Accommodate ground movement and associated effects arising from the construction thereof, and;*
- *Mitigate the effects of noise and vibration arising from the operation of the HS2 railway within the tunnels, ventilation shaft and associated below and above ground structures.*

(ii) The design and construction method statements to be submitted under part (i) shall include arrangements to secure that, during any period when concurrent construction is taking place of both the development hereby permitted and of the HS2 structures and tunnels in or adjacent to the site of that development, the construction of the HS2 structures and tunnels is not impeded. The development shall be carried out in all respects in accordance with the approved design and method statement and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in part

(ii) shall be completed, in their entirety, before any part of the building(s) hereby permitted is/are occupied.

(iii) No works below ground level comprised within the development hereby permitted shall be carried out at any time when a tunnel boring machine used for the purposes of boring tunnels for the HS2 Ltd railway is within 100 metres of the land on which the development hereby permitted is situated.

Reason: To manage the structural impact of the development upon the HS2 proposals, in accordance with policies CS5 and CS14 of the London Borough of Camden Local Development Framework Core Strategy and policies DP24, DP26 and DP27 of the London

- 1.6 It is acknowledged that the requirements for HS2 apply to a project that is still in the planning stages. The requirements set out above in terms of discharging condition 17 are very similar in terms of the development of the design as required in terms of discharging condition 31. So, a similar report to that listed below under item 1.7 ought to have been produced. The focus of this report would be to look at the proposals for the new development in order to not have an impact on the future proposals for HS2.
- 1.7 In preparing this report the main document that has been reviewed is AECOM Report – 100 Avenue Road – Submission for Discharge of Planning Condition 31 dated December 2016. The

report has been located in the section 'Submission for discharge of Planning Condition 31 - Part 1' in the list of documents submitted on the Camden website for this planning application. Part 1 includes the main report as well as Appendices A and B of the AECOM report.

Appendices C, D and E are contained in part 2.

Appendices F and G appear to be contained in parts 3, 4, 5, 6, 7, 8 and part of 9.

Appendix H is contained in parts 9 and 10.

Appendix I is contained in part 10.

Appendix K is contained in part 11.

Appendix L is contained in parts 12 and 13.

Appendix M is contained in part 13.

- 1.8 It is to be noted that Parts 3, 4, 5, 6, 7 and 8 have not been commented upon as they deal with information that is specific for London Underground Limited. This includes surveys and correspondence with various parties.
- 1.9 Therefore as far as the appendices contained in the AECOM report, only appendices A, B, C, H, K, L and M have been commented upon.
- 1.10 It should also be noted that the information has been poorly presented on the Camden website as many of the appendices have been included in different parts of the report. For example, Appendix H is spread over parts 9 and 10 and is not properly headed.
- 1.11 The report will refer to Camden's planning guidance document '*CPG4-Basements and Lightwells*' and Camden policy document '*Camden Development Policies 2010-2025 – DP27 – Basements and Lightwells*'. These documents were conceived for residential buildings that were of a significant size and which contained a basement where the depth was to be 3.0 metres or more. For this reason, we believe that these requirements apply.
- 1.12 The report does not address issues such as rights of light, architectural and conservation setting, etc.

2 AECOM Report – 100 Avenue Road – Submission for Discharge of Planning Condition 31

- 2.1 As noted above the main document is located on the Camden Council website for this planning application under the title ‘Submission for Discharge of Planning Condition 31- Part 1’. Included in this section are appendices A and B. It is dated December 2016. The original report was produced in June 2016, but there appear to have been a series of revisions with the final report being issued in December 2016.
- 2.2 Under the sections on Limitations at the start of the report, there are a number of caveats. In the second paragraph for example there is a note that *‘Information obtained by AECOM has not been verified by AECOM unless verified in the report’*.
- 2.3 Further on in the report there is a statement that *‘AECOM specifically does not guarantee or warrant any estimate or projections contained in this report.’*
- 2.4 It is the view of the writer therefore from the comments provided above in points 2.2 and 2.3 and further clauses in the section of the report relating to ‘Limitation’, that it would appear that AECOM are not taking on full responsibility for the contents of the report.
- 2.5 The Executive Summary makes it clear that the document relates to the impact of the works on LUL (London Underground Limited) assets. This may have been AECOM’s brief to deal solely with the LUL properties, but in our view the brief ought to have covered all of the neighbouring properties and structures.
- 2.6 Under section 7.3 there is reference to ‘Proposed Additional Surveys or Investigations’. Mention is made of a ‘Phase II intrusive site investigation’ that was undertaken in May 2016. From the report, it would appear this information was still awaited. Reference is made for example, to a drawing showing the positions of boreholes. Six boreholes are shown, but there are borehole logs for only 4. The extent of the additional investigation is significant and would normally be sought at the earlier stages of the design. This supports the view that the design of the permanent works is not fully developed at present.
- 2.7 It is noted under section 8.1 that the piles are to be designed by a piling specialist. This is normal practice in the industry. It is reasonable to assume therefore that this design work has not been undertaken.
- 2.8 In section 8.1.3, there is further reference made to ‘final ground modelling calculations’. As stated above this appears that this work has not been completed. It is an important part in the completion of the structural design of the building.
- 2.9 In section 8.3, the ‘Method of Construction’ is commented upon. Nothing by way of proposals has been provided. There is reference to ‘pre-demolition condition visual survey’

being undertaken and a 'system of measured monitoring' will be undertaken. It would appear that none of this work has been undertaken.

- 2.10 Section 8.3 ought to contain or to make reference to, all of the Method Statements for the entire construction process. With the exception of parts 12 and 13, nothing appears to have been provided.
- 2.11 In section 9, there is a statement '*The final design is still being developed*'. It does however suggest that a reinforced concrete solution is being looked at rather than a steel solution. Comments like this suggest that the production of a fully detailed design is some way off.
- 2.12 In section 11, reference is made to the 'Proposed Method of Structural Analysis'. It would appear from the text that this work is still to be undertaken.
- 2.13 In section 12, 'Safety Considerations' are discussed. The text states that a series of items such as '*the design, method statements and risk assessments will address the risk of piling operations*'. Clearly this work is still to be undertaken.

3 Comments on the specific appendices

3.1 Appendix A – Tracking document

This is a tracking document that sets out a series of tasks that need to be undertaken as part of the ongoing design process. The initial comment in section 3 implies that the items listed in Appendix A are complete. A review of appendix A indicates this is not the case.

Examples of this are as follows:

- 3.1.1 Under item 2, there is reference to ‘Condition Survey by Client’s Specialist approved surveyor. This applies to LUL assets but not to other nearby properties.
- 3.1.2 Under item 4, there is reference to a ‘Monitoring Action Plan’. This applies only to the LUL assets. This needs to apply to all adjoining properties.
- 3.1.3 Under item 5, there is reference to *‘possible further 3D FE (Finite Element) analysis may be required’* If this is required, the implications of this need to be conveyed to other owners of the other adjacent buildings.
- 3.1.4 Under item 6, there is a reference to *‘Preparation of Conceptual Design Statement’*. This is a critical document and cannot be found in the submitted documents.
- 3.1.5 Under item 7, there is reference to a *‘Geo-Environmental Report’*. The note implies that this has yet to be fully completed. Again, there is no evidence of this in the submitted documents.
- 3.1.6 Under items 8, 9 and 10, it is very clear that there remains a significant amount of work to be done both in terms of design of the piles, carrying out of the ‘final ground modelling’ exercise, key sections of the building design as well as demolition and construction method statements. All are listed as DESIGN issues, which they are, but some are only 50% complete and some have not actually started.
- 3.1.7 Under item 12, reference is made to monitoring. This however applies to only the LUL assets. It should apply to all buildings that will be impacted by any ground movement or any vibration.

3.2 Appendix B – Impact assessment report

Appendix B of the above report is entitled '*Impact Assessment Report (which includes AECOM layout drawing)*'.

We comment as follows:

- 3.2.1 The report focusses on the impact assessment for interface with LUL.
- 3.2.2 It contains similar caveats as noted in the main report.
- 3.2.3 Section 3.2 refers to the description of the proposed works. It refers to appendix A of this document for details of the proposed post demolition and temporary works proposals and to appendix B for the structural layout and sections of the proposed layout.
- 3.2.4 There are three drawings that form part of appendix A. They are numbered 2141, 0200 and 0201. The information provided on these drawings is very brief and states on the drawings that it is 'outline concept only'. There are further notes that state clearly that the '*drawing is indicative only and subject to approval and full design*'. There is a further note on the main drawing that '*Detailed design of the temporary works (including sheet piling design) to be undertaken by the temporary works engineer*'. Drawing 2141 is marked 'WORK IN PROGRESS'.
- 3.2.5 It is reasonable to say therefore that none of the temporary works or piling design has been undertaken.
- 3.2.6 Appendix B contains 3 drawings that are numbered 2100, 2101 and 2102 that show the basement layout spilt over two of them and a series of sections through the basement. There is no ground floor layout. The drawings are marked '*co-ordination issue. Issued for comments*'. This would indicate that they are still in the early stages of design development. There ought to have been a ground level drawing(s) provided. A ground layout drawing was located in part 14 of the submission. This is numbered 3040.
- 3.2.7 There is a note on drawing 2101 that '*Deep excavations adjacent to site boundaries and public areas. See URS drawing 2140 for conceptual recommendations*'. Drawing 2140 has not been provided in this section.
- 3.2.8 As with the earlier drawings there are clear notes that highlight that the '*detailed design and method statement to be provided by the temporary works engineer and the contractor respectively*'.
- 3.2.9 It is reasonable to assume therefore that neither the detailed design for the temporary works nor the method statement have been prepared.

3.3 Appendix C – Impact of Building Demolition and Construction Report – Ground modelling calculations

The report relating to this was prepared by URS and is dated July 2014.

- 3.3.1 In section 1.0 there is a statement that these are ‘preliminary calculations’. It further goes on to state that ‘a more detailed assessment may be required at a later date using Finite Element Techniques’.
- 3.3.2 The report looks at three scenarios in terms of the ground modelling. These are demolition, construction and the long term (post construction).
- 3.3.3 The analysis is focussed solely, it appears on the impact of the scheme on the LUL infrastructure and not on any neighbouring properties.
- 3.3.4 A brief review of the output shows that some of the settlements/ground movements could have an impact on neighbouring properties.

3.4 Appendix H – Factual Geo-environmental Report by concept

The information for Appendix H is spread in parts 9 and 10 of the Camden website.

The report has been prepared by **concept** following a site investigation that appears to have been undertaken in May 2016

- 3.4.1 The soil investigation appears to have undertaken four boreholes. Referring back to the AECOM document, there was reference to six being taken. It is not clear what has happened to the other two.
- 3.4.2 The AECOM report suggested that all six would be to a depth of around 50 metres. It seems that two have been taken to this depth and two to a depth of around 35 metres. In the view of the writer, given the proposal is to support a 24 storey building, a more comprehensive investigation ought to have been undertaken. This may follow.
- 3.4.3 The additional data that has been provided by way of sampling and testing appears to be reasonably comprehensive, but as noted above, more boreholes ought to have been undertaken with the appropriate amount of testing to accompany them.

3.5 Appendix I - Geotechnical Interpretive Report

This report is located in part 10 of the planning documentation and has been prepared by AECOM. It is dated 13th July 2016.

- 3.5.1 The report is reasonably comprehensive and sets out the desk studies that have been undertaken as well as reviewing geological information in the surrounding areas.
- 3.5.2 Under point 2.5 Other Assets, the report highlights that *'the proposed route alignment for HS2 Up Line crosses the southern boundary of the site which is located within the safeguard zone'*.
- 3.5.3 It also highlights that *'the impact of HS2 should be reviewed as part of the design process'*. There appears to be no evidence in the documents reviewed that this has been taken on board.
- 3.5.4 The ground profile is what would be expected on site in this part of London.
- 3.5.5 The test results of the soils are broadly in line with what would be expected in this part of London.
- 3.5.6 The ground related hazards are as would be expected for a site in this part of London. Hazards that are rated High Risk such as chemical attack to the concrete and the finding of obstructions and old foundations are also as expected and will need to be dealt with.
- 3.5.7 The ground related hazards also highlights the location of the HS2 project and the presence of unknown services as High. In terms of the former it highlights the need for the team to enter into discussions with HS2 as well as undertaking ground impact assessments to meet HS2 requirements. There is no evidence within the documentation that this has happened. As noted earlier this also appears to apply to the design of the structure.
- 3.5.8 The report does not give any recommendations as to the type of foundations that ought to be provided. A comparison of piling versus raft foundations should be discussed in the report.

3.6 Appendix K – Noise and Vibration Mitigation Report

This report has been prepared by RSK and is dated December 2013. It is located in part 10. The report focusses on the noise and vibration that would be experienced within the proposed buildings. For that reason, no comments have been made on the report.

There is a second report that has been prepared by Hann Tucker (also contained in part 10) that is dated June 2016. This report is commented upon.

- 3.6.1 The report focusses on the existing noise levels that would be experienced around the site at present.
- 3.6.2 The report then moves on to comment on the noise levels that will be generated by plant in the completed scheme and the noise levels that will be generated by the reflection of traffic noise off the completed development.
- 3.6.3 There is no mention of the situation regarding noise and vibration during the demolition and construction process along with the impact that this will have on individuals and nearby buildings.

3.7 Appendix L – Demolition Method Statement and Construction Method Statement/ Approach to Basement construction.

There are two documents that form part of this appendix. These are a report produced by John F Hunt Demolition Limited which is entitled 'Outline Tender Method Statement' for the demolition work. It is dated 29/3/2016. It is located in part 12 of the Camden documents.

The other has been produced by AECOM and is entitled 'Outline Basement Construction Method Statement/Approach to basement Construction' dated July 2016. It is located in part 13 of the Camden documents.

AECOM have used the term 'construction method statement' in the title for this appendix, but this does not appear to exist.

3.7.1 Demolition Document

3.7.1.1 The document is clearly only a tender document. As would be expected, it is not a properly thought through document that sets out in detail as to what is proposed for the project.

3.7.1.2 The document states very clearly that the information provided is very preliminary in terms of this specific project and there is extensive reference to more surveys being required to be undertaken, far more detailed proposals being developed, temporary works scheme, etc.

3.7.1.3 There are items missing such as Appendix 1.

3.7.1.4 The information regarding traffic movement is generic. There is a note that specifically says that the detailed plan will only be developed once the tender has been accepted.

3.7.1.5 Much of the first part of the document is very standard in terms of Health and Safety which is standard for any similar project.

3.7.1.6 The document contains around a dozen CV's for the staff that will be working on the job.

3.7.1.7 Very little of the document is site specific.

3.7.1.8 In the writer's view, it cannot be seen as a detailed demolition method statement.

3.7.2 Basement Construction Method Statement

3.7.2.1 As noted on the title, it is only an outline method statement.

3.7.2.2 It makes it quite clear under item 2.1 that the document is only a 'conceptual sequence' for the temporary works, demolition and construction of the basement.

3.7.2.3 There is a listed sequence of 14 points setting the sequence of construction. It is not detailed.

3.7.2.4 The detail by way of a sequence is limited to 4 A4 size sketches that show no detail.

3.7.2.3 It is not clear where the sections used are taken.

3.7.2.4 Drawing 2140 is included in this section. It can best be described as a concept drawing. It contains a detailed note as follows:

INFORMATION ON THIS DRAWING IS INDICATIVE ONLY AND SUBJECT TO APPRAISAL AND FULL DESIGN BY TEMPORARY WORKS CONTRACTOR. • DETAILED DESIGN OF ALL TEMPORARY WORKS (INCLUDING SHEET PILING DESIGN) TO BE UNDERTAKEN BY TEMPORARY WORKS ENGINEER. • DEMOLITION REQUIREMENTS TO BE DEVELOPED. • TEMPORARY WORKS TO BE INSTALLED PRIOR TO DEMOLITION OF EXISTING BASEMENT WALLS, OTHER RETAINING WALLS OR SUPPORTING STRUCTURE. • CONTRACTOR TO ALLOW FOR DEWATERING, PENDING DETAILED GROUND INVESTIGATION. • PILING AND DEMOLITION SEQUENCE AND PILING PLATFORM LEVELS TO BE DEVELOPED BY CONTRACTOR. TEMPORARY WORKS TO BE SUITABLE TO PROPOSED SEQUENCING AND SUBJECT TO ASSESSMENT OF STRUCTURAL CAPACITY OF EXISTING STRUCTURES WHERE TEMPORARY LOADING IS APPLIED WITH STRENGTHENING AS NECESSARY. • ALLOW FOR 2No. TOWER CRANES WITH FOUNDATIONS, ALL TO CONTRACTOR'S DESIGN AND DETAIL. • WITHIN HIS TENDER, MAIN CONTRACTOR TO CONFIRM PROPOSED SEQUENCE AND METHOD FOR CONSTRUCTING THE BASEMENT BOX.

3.7.2.5 The document cannot be accepted as being a detailed method statement.

3.8 Appendix M – Emerging Basement Design

This section of the report relates to the 'Emerging Basement Design. The information is located in Part 13.

- 3.8.1 The report contains three drawings which are numbered 00500, 03013 and 03020. They are marked Stage 3 which is an early stage of design development.
- 3.8.2 There is no text or any information that sets out the design strategy for the design of the basement.
- 3.8.3 There are extensive notes on the drawing as follows:

INFORMATION ON THIS DRAWING IS INDICATIVE ONLY AND SUBJECT TO APPRAISAL AND FULL DESIGN BY TEMPORARY WORKS CONTRACTOR. • DETAILED DESIGN OF ALL TEMPORARY WORKS (INCLUDING SHEET PILING DESIGN) TO BE UNDERTAKEN BY TEMPORARY WORKS ENGINEER. • DEMOLITION REQUIREMENTS TO BE DEVELOPED. • TEMPORARY WORKS TO BE INSTALLED PRIOR TO DEMOLITION OF EXISTING BASEMENT WALLS, OTHER RETAINING WALLS OR SUPPORTING STRUCTURE. • CONTRACTOR TO ALLOW FOR DEWATERING, PENDING DETAILED GROUND INVESTIGATION. • PILING AND DEMOLITION SEQUENCE AND PILING PLATFORM LEVELS TO BE DEVELOPED BY CONTRACTOR. TEMPORARY WORKS TO BE SUITABLE TO PROPOSED SEQUENCING AND SUBJECT TO ASSESSMENT OF STRUCTURAL CAPACITY OF EXISTING STRUCTURES WHERE TEMPORARY LOADING IS APPLIED WITH STRENGTHENING AS NECESSARY. • ALLOW FOR 2No. TOWER CRANES WITH FOUNDATIONS, ALL TO CONTRACTOR'S DESIGN AND DETAIL. • WITHIN HIS TENDER, MAIN CONTRACTOR TO CONFIRM PROPOSED SEQUENCE AND METHOD FOR CONSTRUCTING THE BASEMENT BOX.

- 3.8.4 It is reasonable to assume that in the light of the comments above, the structural design of the permanent works are not sufficiently far advanced to call this a completed detailed design. The temporary works design has clearly not commenced nor have any detailed method statements been produced.

4 Construction Management Plan

- 4.1 We refer to the Construction Management Plan (CMP) for the project that is dated May 2014 and was prepared by Balfour Beatty.
- 4.2 The document acknowledges that further input is required regarding obtaining detailed method statements from the various contractors. Much of the content however is what would be expected on the proposal for any construction site in London.
- 4.3 While it is acknowledged that the final format of the CMP is only required immediately prior to start on site, it is essential that an updated version should be provided in the applicant's report as part of the planning process given that this document is integral with what is proposed.
- 4.4 It acknowledges the need to satisfy the requirements regarding both TfL and HS2 and goes into detail regarding the latter in terms of the design of the basement. They are quite onerous. This is discussed later in this report.
- 4.5 The document is quite lengthy and hence it is inappropriate to comment in detail on every point.
- 4.6 The logic of the sequence that has been followed is sensible and as noted above needs much more detail to be provided.
- 4.7 One important comment relating to Health and Safety, it is not entirely clear the loading and off loading points of heavy loads. The diagram provided does not show if this is from the road or from the site. It must be the latter.
- 4.8 It is noted that there will be 6 to 10 traffic movements an hour. The vehicles for the most part will be large and will probably need to use two lanes in order to turn into the traffic lane as they leave this site.
- 4.9 Mention is made of the traffic routes in the immediate vicinity of the site. The report needs to be revisited as the we understand that there are proposals made to modify the traffic routes in the immediate vicinity of the site.

5 Camden basement design requirements

As noted above, the report has looked in addition at the requirements that Camden require in terms of the information to be provided in support of a planning application for a residential building where the depth of the basement exceeds 3 metres.

We refer to Camden's planning guidance document '*CPG4-Basements and Lightwells*' and Camden policy document '*Camden Development Policies 2010-2025 – DP27 – Basements and Lightwells*'.

- 5.1 They seek the application to have a fully detailed design for the permanent works including piling. This would include drawings and calculations. Much of what has been provided as noted above is either preliminary or conceptual.
- 5.2 A similar comment relates to the design of the temporary works and the method statements. All of this is simply conceptual in terms of the information that has been provided.

All these shortcomings are highlighted in detail earlier in this report. In our view therefore, it is reasonable to say that Camden's requirements have not been met.

6 Comments relating to condition 17

- 6.1 These comments relate to the requirement to comply with condition 17 regarding the development of HS2. Whilst they are not identical, they are not dissimilar to the requirements of condition 31.
- 6.2 Whilst this issue is not part of this planning application, this is in our view a very important issue and ought to have been dealt with as part of this application or as part of a separate application.
- 6.3 Reference is made to HS2 in the AECOM report and commented upon in this report under sections under points 3.5.2 and 3.5.3.
- 6.4 In our view, the information provided with this application as mentioned in detail in this report, is unlikely to satisfy the requirements of HS2.

7 Summary

- 7.1 The submission made by AECOM appears to look at all of the critical issues in relation to discharging Condition 31.
- 7.2 It is however insufficiently detailed. There are references throughout the document and appendices to the information being preliminary, design not started, etc. Also, due to the inclusion by AECOM of numerous caveats in the report, there is doubt about AECOM taking full responsibility for the content of the report.
- 7.3 The information provided should cover the detailed design of all of the permanent works, temporary works, specialist design such as piling, method statements, etc. It does not do that.
- 7.4 Similar comments relate to the information being able to provide sufficient information to discharge condition 17. We are of the view that the two conditions should be discharged in parallel.
- 7.5 The Construction Method Statement is preliminary. It needs to be far more detailed.
- 7.6 The package of information provided does not meet the key requirements as set out in the Camden planning documents 'CPG4 – Basements and Lightwells' and 'Camden Development Policies 2010-2015 – DP27 – Basements and Lightwells'