

The Fitzroy Park Residents' Association

Please reply to: Dancers End
Fitzroy Park
Highgate
London
N6 6HT

Ben Farrant
Planning Officer
London Borough of Camden
5 Pancras Square
London
NIC 4AG

September 22, 2017

Dear Mr Farrant

Planning application 2017/4301/P – Wallace House, Fitzroy Park

Fitzroy Park is a private road, maintained by its residents, which serves some 70 households, about 100 allotments and the North London Bowling Club. This Association (FPRA) acts on behalf of the residents and users of the road, to maintain and preserve the fabric of the road and the services associated with it.

We believe that the Construction Management Plan forming part of the current Application referenced above is inadequate and fails to demonstrate that this work can be carried out without damage to the road and significant interference with its use. **We therefore request that the Application is refused, at least until these issues are satisfactorily addressed.**

The grounds for this request are outlined below. Further details are in the attached report by consultants WSP, commissioned by FPRA. The additional swept path analyses referred to in that report will be forwarded when received.

Access to the site

The site can only be accessed via Fitzroy Park and the Bowling Club lane. The 240m or so of Fitzroy Park used varies in width between 3.5m and 4.9m; the Bowling Club lane is approximately 4m wide. The lane also serves two other houses, and the Bowling Club which has over 100 members; the stretch of Fitzroy Park (from Merton Lane) is the main access for traffic to all of Fitzroy Park. The junction from Fitzroy Park into the lane (and vice versa) is sharp and cannot normally be turned in one move by a large vehicle.

The Application contains Swept Path Analyses which are deficient in the following respects, which should be remedied before the Application is considered for approval:

- Some assume use of the Bowling Club car park as a turning head, which is not feasible; others assume that HGVs will turn at the junction and be reversed for the length of the lane, which is difficult and hazardous
- They appear to assume the lane is about 5m wide, whereas it is just over 4m – this is critical to the feasibility of the manoeuvres proposed and a proper survey of the route must be carried out as a basis for a fresh analysis
- There are no diagrams showing how vehicles will exit the site and the lane

- There is no allowance for a safety ‘buffer zone’ around the vehicles in any of the diagrams (the norm is 0.5m each side)
- There is no diagram showing how the proposed 8.7m rigid vehicle (the largest proposed) will access or leave Fitzroy Park from/to Merton Lane.

Impact on road users

Significant works are planned at other sites in the road which will share the Fitzroy Park section of the access route – notably major works proposed at 53 Fitzroy Park and 4 The Hexagon. The cumulative impact of these with the current Application has not been assessed – potentially it could reach up to 30 HGV movements per day, which is well beyond the available capacity of the road. The plans must take this impact into account.

The impact should also take account of light good vehicles, which are not currently quantified in the plans.

Large deliveries to site should be limited to between 10am and 3pm to minimise impact on neighbours.

The CMP also suggests the need for some suspension of allotment holders’ parking in Fitzroy Park. This is not acceptable to FPRA.

We welcome the commitment to the use of banksmen to coordinate all traffic to the site.

Potential for damage

A survey of the route (including the lane) should be undertaken by the Applicant in conjunction with FPRA (for the road) and the Bowling Club (for the lane), to form a baseline against which any damage caused by traffic can be assessed.

The Applicant should be required to repair any damage in a timely manner and to agree with FPRA and the Club the means by which such remedies can be secured.

Consultation with residents

When the above omissions have been addressed, this Association will be happy to participate in consultation, before and during the works, on how to mitigate the impact on the road and its users. We expect the Applicant to set up a formal consultation group, comprising FPRA and immediate neighbours, including the Bowling Club, for this purpose.

Yours sincerely



Harley Atkinson
Treasurer, FPRA



Our ref: 70014753-002

September 22, 2017

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Subject: The Wallace House PA 2017/4301/P - Construction Management Plan Technical Review

WSP has been appointed by The Fitzroy Park Residents' Association (FPRA) to review and advise them on the suitability and acceptability of the Construction Management Plan, prepared by SOUP Architects Ltd and submitted as part of planning application 2017/4301/P, for a residential extension to the existing building at The Wallace House, Highgate.

At the present time, based on the information contained within the aforementioned CMP, there appears to be inadequacies or missing information which as a result could underestimate the potential requirements or impacts of the construction activities. Subsequently the true mitigation required to address to maintain the safe and efficient operation of Fitzroy Park and the surrounding public highways for all users may also be being underestimated.

Furthermore there are some proposed aspects of the construction management which, in our opinion, would not be deemed appropriate for the locality.

The key findings which have led us to this conclusion are summarised as follows:

1. Site Access & Accuracy of Survey;
2. Reliance on the North London Bowling Club (NLBC) car park;
3. Fitzroy Park & Merton Lane Junction - Swept Path Analysis;
4. Proposed Delivery Hours;
5. Impact on Allotment Car Parking;
6. Cumulative Construction Traffic Impact;
7. Potential Pavement Impact & Damage; and
8. Initiation of Contractors Liaison & Working Group.

Further explanation and details on each are set out in subsequent sections of this letter.

We would recommend the FPRA via the London Borough of Camden seek an address from the applicant to the points set out below before the application is determined as the issues are not all appropriate to condition for post consent address prior to works commencing on site.



Site Access

Review of the CMP has identified the applicant's proposal to use the North London Bowling Club (NLBC) carpark as a turning head for reversing in to the site.

The NLBC carpark is privately owned with a gate positioned at the entrance to prevent parking when the club is closed. As such the use of the NLBC carpark cannot be guaranteed for use by the development and there is no evidence to suggest the NLBC are amenable to the proposal.

We also note the entrance to the bowling club is an unsealed pavement typically servicing light vehicle traffic and subsequently a lower standard than the pavement of Bowling Club Lane or Fitzroy Park. Utilising this access as a turning head may lead to unnecessary degradation of the entrance to the NLBC.

It is therefore recommended that this option for site access is removed from the CMP.

An alternative of reversing from Fitzroy Park down Bowling Club Lane with traffic marshals is proposed. On this occasion we recommend this is employed as the primary method to access the site as least disruptive subject to address of any subsequent points contained in this review.

Note the contractor should give consideration, so long as safety is not impinged on, to muting the audible warning signal when reversing in order to avoid unnecessary noise pollution for adjacent residents.

Topographical Survey

We note the swept path analysis for Fitzroy Park has been based on Topographical Survey which doesn't appear to extend to Bowling Club Lane.

The Bowling Club Lane swept path analysis has been undertaken and based on Ordnance Survey mapping data. Ordnance Survey (OS) mapping data has an inherently limited level of accuracy. A full topographical survey of BCL should be complete and used for the planning application assessments.

At its smallest (most detailed) scale of 1:1250 OS data's accuracy is reported, by the Ordnance Survey, to be $\pm 0.5\text{m}$. As a consequence there is a greater risk of disparity between the OS data and the existing site and surrounding roads topography. Should the existing building position and boundaries of Bowling Club Lane road be out by up to 0.5m each this could reduce the available space to execute the contractor's planned movements by up to 1.0m .

This disparity is particularly evident when you look at the swept path analysis drawing for the Merton Lane junction where OS data and Topographical Survey has been overlaid and the difference in the geometric arrangements and location of the traffic island for example.

Based on feedback from the FPRA the available width in Bowling Club Lane (BCL) would appear to be much narrower than the OS survey indicates. The OS data suggests it is of the order of 5m wide where as in reality it is much less at approximately 4m wide.

Furthermore we understand construction vehicles similar in size to the largest proposed for in this CMP using BCL for previous domestic renovations have encountered problems due to the constrained arrangements, particularly turning out on to Fitzroy Park from BCL and in some instances damaging the boundary treatments of the adjacent properties.

Therefore we would expect swept path analysis to be carried out on site specific topographical survey data. See later sections. This data has a far higher degree of accuracy and therefore can better determine whether the analysis shown is realistic, accurate and fundamentally achievable to enable the CMP to be accepted or refined accordingly.

Any decisions which rely and are based on this analysis could be fundamentally flawed and could lead to potential issues for the contractor, local residents and members of the public alike attempting to access Bowling Club Lane and Fitzroy Park when the CMP is implemented.



Swept Path Analysis – Bowling Club Lane

The swept path analysis for the junction of Bowling Club Lane and Fitzroy Park only includes analysis for vehicles entering the site as presented in SOUP Architects Ltd drawing nos. 299-Figure 11 to 299-Figure 16.

We would expect analysis demonstrating that all the proposed construction vehicles can enter the site safely, traversing Bowling Club Lane, from Fitzroy Park and subsequently exit the site back on to Fitzroy Park.

In addition it is good industry practice to provide swept path analysis which shows a clear buffer (up to 0.5m is not unreasonable) from any physical constraints to allow for such things as vehicle wing mirrors which extend outside the vehicle profile and provide a suitable margin for error or data inaccuracy, see earlier section.

Given the constrained nature and acute limitations that appear to exist on BCL and at the BCL / Fitzroy Park junction mentioned in previous sections we would strongly recommend that the swept path analysis is revisited to include the above.

In the interim we have undertaken some preliminary analysis of the missing vehicle movements on OS data adding indicative lines to better represent the actual (but not exact) width of BCL mentioned in an earlier section for comparison.

The swept path analysis, appended to this review, shows how constrained BCL could be if the rudimentary assessments of the FPRA are found to be correct, therefore, in our opinion, reinforcing the need for an accurate baseline survey for any subsequent analysis.

Swept Path Analysis – Fitzroy Park / Merton Lane Junction

The swept path analysis contained in the CMP for the Fitzroy Park / Merton Lane Junction is for a 6m skip lorry. As stated in the CMP and employed in the swept path analysis for Bowling Club Lane the largest construction vehicle to be employed is an 8.7m long 6 wheel rigid concrete mixer. As such this analysis under estimates and mis-represents the potential impacts at this location and should be rectified.

It is imperative that the applicant addresses this and provides the omitted analysis within the CMP for further consideration.

Delivery Hours

We note the intended delivery hours for the site are 9am to 4pm. We understand residents at Fitzroy Farm have requested, through the FPRA, large deliveries be limited to after 10am and before 3pm to ensure access to their property is not unduly restricted.

This does not seem unreasonable and a commitment should be given in the CMP to manage and limit the largest of deliveries to the above times.

For the purposes of this review a large delivery is considered to be anything larger than a van and exceeding 4m in length given the context of the site and adjacent residencies.

Allotment Parking

As noted in the CMP parking for the allotments regularly occurs along the north side of Fitzroy Park road and the allotment holders have permits to park in this location only (100 permits). The allotment parking, we understand, is administered by the FPRA.

The CMP notes suspension of the allotment parking will be necessary but does not appear to quantify or assess the requirements. Furthermore we understand there has been no consultation with FPRA on the potential for suspensions.



The developer and/or contractor do not have the authority to implement or enforce such a parking suspension so it would appear this mitigation measure is not in their gift and as such cannot be relied upon unless demonstrated otherwise.

A restriction on parking along Fitzroy Park at this location may ultimately be the right solution when considering the preferred sit access arrangements however there is insufficient consideration in the CMP of what the impacts of suspending this parking are on the patrons of the allotment and therefore the operation and use of the wider Fitzroy Park for the FPRA or others to make any decisions or concessions.

Under the terms of their permits parking for the allotment is expressly prohibited on Fitzroy Park outside the properties of neighbouring residents.

If inadequately mitigated or insufficiently planned for, indiscriminate parking may occur elsewhere on Fitzroy Park. This could simply create traffic issues elsewhere and have a further undue impact on local residents.

Should the applicant or contractor wish to pursue this further assessment should include surveys of the typical number and location of parking during the stipulated working hours.

Once the potential impact has been fully quantified we would then expect the potential to mitigate these construction impacts to be evaluated for wider discussion with the allotment patrons and FPRA. We would recommend this is addressed prior to approving the CMP and determination of the planning application.

Cumulative Traffic Impact

No appraisal of the cumulative construction traffic impacts has been provided within the CMP.

As noted in the CMP there are at least 4 no. other committed developments currently on site or due to be in a similar timeline to Wallace House redevelopment, should it gain consent, which will utilise Fitzroy Park.

In addition there is also the potential redevelopment of No. 4 The Hexagon which although not consented has had a planning application submitted for it and is in the public domain.

We understand that generally speaking, Camden will limit the number of allowed construction vehicles to 8 per site per day (16 no. two way movements).

With the other committed developments occurring simultaneously this could lead to 32 vehicles per day (4 x 8) utilising Fitzroy Park and Merton Lane. If other applications currently being consulted on are consented this could increase further.

With potential turnaround periods of 30 minutes and the limited or inability for two construction vehicles to pass on Fitzroy Park the individual movements of construction vehicles need to be carefully coordinated to avoid severely impeding the local residents, patrons of the NLBC and the allotments access.

The contractor's intention to hold vehicles on Merton Lane before allowing them to advance to site is contrary to the general policy of Camden so as not to unduly affect the residents of Merton Lane.

The facilities for waiting on Merton Lane are limited and if this was permitted, given the accumulation of re-developments underway there could be a number of construction vehicles attempting to wait on Merton Lane at any one time which may create issues for other highway users and cause nuisance for local residents.

Also any proposals by the contractor to introduce a circling pattern on Merton Lane or Fitzroy Park would create unnecessary congestion and environmental issues and should not be employed. A suitable holding point further afield should be agreed with LB Camden Highways.



Liaison with the Project / Site Managers of the consented developments has been mentioned but with insufficient detail on the outcome or proposals for greater coordination or collaboration. As a key requirement of compliance with CPG 6 we would expect the matter to be considered in more detail at this stage, if even to demonstrate the risk of the aforementioned issues is low or non-existent.

Given the proximity and nature of the other local developments we believe it is necessary and we recommend the omission is rectified by the applicant (or their consultant) to consider and establish any potential traffic issues to allow mitigation measures or alternative arrangements agreed accordingly to protect the amenity of the local area.

This is a not unreasonable recommendation 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.

Pavement Condition & Impact

Fitzroy Park and Bowling Club Lane are private roads, managed and maintained on behalf of residents by the FPRA and the NLBC. The aforementioned roads are also of a historic nature and the specification and make-up of the existing pavement construction would be considered a lesser standard.

A review of the CMP has identified that the applicant has not assessed or considered the necessity for any measures to mitigate the risk of pavement damage from the traffic through the construction period.

If not properly assessed and suitability established, over time, the use of Fitzroy Park by construction vehicles may lead to the compression or consolidation of the underlying pavement layers.

We would recommend that the applicant includes mitigation measures in the CMP in the form of the following:

1. Baseline pre-commencement condition survey undertaken by suitably qualified and independent individual(s);
2. A commitment or undertaking to provide a reasonable bond, exact figure to be agreed, so that any damage caused by construction vehicles can be rectified and not financially burden or penalise the FPRA; and
3. Post completion condition survey undertaken by suitably qualified and independent individual(s).

Consideration to the status and stage of other developments underway utilising Fitzroy Park or BCL will need to be given in surveys and the proportional value of the bond.

Fitzroy Park Contractor Liaison & Working Group

As mentioned above Fitzroy Park and Bowling Club Lane are private roads, managed and maintained on behalf of residents by the FPRA and the NLBC.

We would advocate the initiation of a specific Contractor Liaison & Working Group (CLWG) which involves representatives from all the contractors working within the Fitzroy Park area, the FPRA, NLBC, the allotment holders, ideally Camden and any other appropriate stakeholders.

The CLWG would help maintain continuous and effective communication, consultation and coordination between stakeholders as well ensuring the measures agreed under each CMP are adopted and implemented.

The exact remit of the CLWG can be defined in due course but a commitment to participate if founded could be included in the CMP.



Conclusion

WSP has undertaken a review of the SOUP Architects Construction Management Plan, on behalf of the Fitzroy Park Residents' Association to review and provide them with independent advice on the suitability and acceptability of the management plans proposals.

We would recommend the CMP is revisited by the applicant, addressing the points on the inadequacies or missing information we have raised, before any decisions are taken on about the suitability of the proposed development, its CMP and the impact on the surrounding area.

At the present time, based on the information contained within the aforementioned CMP, we believe there is insufficient information for the planning application to be reasonably determined.

Prepared by:



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