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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 (CMP), 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 and 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;
2. Reliance on the North London Bowling Club (NLBC) car park;
3. Fitzroy Park & Merton Lane Junction - Swept Path Analysis;
4. Impact on Allotment Car Parking;
5. Cumulative Construction Traffic Impact;
6. Potential Pavement Impact & Damage; and
7. 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 applicants 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.

It is noted that revised swept path analysis plans were published on 25 October 2017 using the method of reversing down Bowling Club Lane to access the site. Based on the revised plans it is not clear if the applicant proposes to solely use this method to access the site and this should be confirmed.

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.

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.

The revised swept path analysis published on 25 October 2017 is now using a topographical survey as a base. The revised swept path analysis confirms the constrained width available in Bowling Club Lane of approximately 3.5m and highlights a number of areas where vegetation would be affected by vehicular movements. We also note that the current swept path analysis does not appear to work with the pedestrian and vehicular gates at the property boundary.

One particular concern is the turning movement outside the NLBC which shows the vehicle chassis over sailing a garden with the wheels also in very close proximity to the raised timber kerb. Based on this movement it appears highly likely there will be damage to the vegetation and potentially the kerbing throughout the construction period.

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 tuning out on to Fitzroy Park from BCL and in some instances damaging the boundary treatments of the adjacent properties.

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, which the current analysis does not allow for.



Given the constrained nature and acute limitations that appear to exist on BCL and at the BCL / Fitzroy Park junction we would strongly recommend that the swept path analysis is revisited to include a suitable buffer.

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 – 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

It is noted that in the revision B update to the CMP, the delivery hours for the site were amended to 10am to 3:30pm. We understand this was in response to the residents at Fitzroy Farm's request, through the FPRA, that large deliveries be limited to these times to ensure access to their property is not unduly restricted.

This change is endorsed, however we understand that no other updates were included within the revision B version of the CMP.

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 site 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.



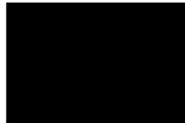
Conclusion

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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