

From: Edie Raff [REDACTED]
Sent: 11 November 2019 10:35
To: McClue, Jonathan [REDACTED]
Cc: 100avenueroadCMP [REDACTED] Barry Coltrini
Subject: Public CMP Pro Forma v2.3 Theatre Square

Public Construction Management Plan Pro forma v2.3 Theatre Square, 100 Avenue Road – Consultation Version

November 11 2019

Dear Jonathan

As the Chair of the Cresta House Residents Association, I am writing to raise my objections to the amended CMP that has been submitted to Camden Council on the 1st November 2019.

The objections I raised to the 10 October 2019 CMP remain the same. They have not been addressed in the amended CMP now under review. [For ease of reference I have included below my 16.10 2019 email to Barry Coltrini]

Both demonstrate Camden officers' willingness to throw the local community under the bus – no matter how unreasonable and outrageous the revised proposals are – in order to allow the build to progress.

In particular, my objections focus on the fact that Camden officers are here again surrendering their own principles and guidelines in order to allow a revised CMP to go ahead that tramples even more over pedestrians, drivers, children and parents than does the current CMP.

As a result, a CMP that approves of sacrifices and absurdities is now under serious consideration:

1. The sacrifices and absurdities stem from the recently disclosed restriction imposed by TfL that it will **not allow** the delivery of building materials to swing over the public's heads and the subsequent folly that **all construction vehicles coming from the depot in the north must drive right past the entrance to the site** because they cannot make the necessary 90 degree turning off the Southbound A41 – and must therefore traverse around all 3 sides of the congested gyratory in order to gain access to it.

- To demonstrate how inconsequential this TfL restriction is, the CMP presents a video of a single lorry – no other road users in sight - making its way around the Swiss Cottage gyratory in less than 1¼ minutes - a notorious gyratory that is nearly always choc-a-bloc with cars, lorries and TfL buses jockeying for position.
- This version of the CMP also states clearly that not only vehicles entering the site at Access 2 – but vehicles accessing the pit lane [pro forma page 32] – will also have to make this same journey all around the gyratory before they can access the pit lane.
- And **all** of them will have to make the same tortuous journey around the gyratory when exiting the site in order to return to base.

The video makes the false claim that the **25 vehicles entering and leaving the site via Access 2 [50 in and out circuits around the gyratory]** and the **28 proposed vehicles entering the pit lane [56 in and out circuits around the gyratory]**

“Pit lane vehicles will travel along Finchley road/ A41 onto Avenue Road A41, turn right onto Adelaide road, turn right again onto Finchley road and a final right into the pit lane.” [pro forma pg.32]

will have a traffic-free journey around the gyratory and 2 sets of traffic lights and that these **106 additional circuits around the gyratory** will not adversely add to the significant traffic jams that already exist on the A41.

By all parameters, it is difficult to believe that officers and TfL find it acceptable to allow **106 extra construction vehicles** a day [some of them 54-foot articulated lorries] to make this logistically ridiculous detour – **just in order to access the site at all.**

Surely had it been made clear to Camden not just one month ago but far earlier in the process that there was no direct way to enter the site from the depots in the north [can we really believe that this crucial piece of information only came to light a few months ago?] – Camden and TfL might well have made other decisions.

2. This version of the CMP avoids an assessment of the cumulative impact of the significant increase in construction lorries using **all 3 access/egress points** on the A41.

3. Nor has TfL supplied any data on the impact the CMP will have on adjoining streets that will bear the brunt of drivers trying to avoid the inevitable traffic jams on the A41.

4. This version of the CMP does nothing to address the significant and unfair inconvenience this version will cause pedestrians:

- The 2 alternative bus stops to the north and south of the closed bus stop are both too far away for all but the able-bodied: wheelchair users, people on crutches or using a cane, parents with prams and toddlers, pedestrians with heavy parcels – must now make their convoluted way across at least 2 sets of traffic lights and across several lanes of traffic
- All will be forced to stop dead in their tracks throughout the day each and every time a construction vehicle **enters** the site and each and every time a construction vehicle **exits** the site. Each entrance/exit involves opening the gates, swinging the barriers in place, waiting for the vehicle to manoeuvre in to the oncoming traffic, and waiting for the barriers to be swung back into place. This process takes far more time than the ‘few seconds’ posited by Mace.

It is inexcusable that officers have so little regard for the real hardships this plan foists on pedestrians. This obstructive plan might be justifiable for a few weeks or months but not for years.

5. To commandeer an entire lane of traffic on such a major public road artery is not fair to road-users and shows yet more blatant disregard for the chaos this will generate. Perhaps merging 2 lanes into one could be justifiable for a few weeks or months but not for the years necessary for this build.

6. If all of the above were not damning enough, it is unconscionable – and in the case of Clean Air Chief Spokesman Cllr Adam Harrison, unconscionable and hypocritical – that a borough that touts

their anti-pollution credentials is allowing the developer permission to encroach **into the public's** parkland space **outside the developer's boundary**— **adding to the already over-the-limit pollution levels** that exist on the site. Allowing huge vehicles to encroach on even 10% of the open space directly adjacent to the playgrounds will clearly add to the 63% over-the EU limit of nitrogen dioxide levels that exist there now.

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- I object to the accepted practice of 'averaging' that the Council invokes when attempting to justify unacceptable levels of noise or pollution. Applying this method of averaging out – say, noise - over the 10 hour workday leads to the following ludicrous situation: construction could, theoretically, be carried out at 500 decibels for one hour each day because when 'averaged out' over a 10 hour day it becomes a permissible noise level of 50 decibels. The human ear hears the actual sound generated NOT an averaging-out of that sound over time.

For the above reasons I ask the Council to seriously consider refusing this version of the CMP.

Kind Regards

Edie Raff, Chair, Cresta House Residents Association