

Appendix W – updated September 2018

Note responding to queries raised at planning committee on 19th July 2018 and subsequently updated post the CS11 Judicial Review ruling

18.09.18

Section 1 - Queries addressed:

1. [TfL's Objection to Sole Construction from the A41](#)
2. [Impacts of a 5 Year Construction Programme](#)
3. [Judicial Review of the CS11 Scheme](#)
4. [Confirmation that the CMP is in Accordance with the S106 Agreement](#)
5. [Facilities in Place for Noisy Works and Dust Suppression](#)
6. [Tree Protection](#)
7. [Types of Vehicles Being Used](#)
8. [Suggested Barrier System](#)
9. [Market Officer Proposed](#)
10. [Alternative Access Options Considered](#)
11. [Objectors Claim Mayor Said all Work from the A41](#)
12. [Air Quality Commitments](#)
13. [Open Space License](#)
14. [Further meeting/discussions with TfL and developer on sole use of A41 requested](#)
15. [Additional info required to explain why it is not possible to use only A41 and that the use of residential roads has been minimised as far as possible](#)
16. [Further Commitments](#)

Section 2 – Full Programmes by BDG

Introduction

The following document addresses the points raised at the Planning Committee of the 19th July 2018 and should be read in conjunction with the updated Construction Management Plan and Appendices. These can be viewed at: <https://creeksidewharf.london/public-consultation/theatre-square/scheme/>.

Section 1 – Queries Addressed

1. TfL’s Objection to Sole Construction from the A41

Essential Living and TfL have been in dialogue for over a year regarding the Construction Management Plan (CMP) for 100 Avenue Road, with TfL producing a formal written response which can be found on Page 38 of the Public Reports Pack for the 19th July 2018 planning committee found on Camden Council’s website:

<http://democracy.camden.gov.uk/mgChooseDocPack.aspx?ID=7763>.

TfL have subsequently submitted a new formal response to the CMP on the 19th October 2018, which can be found in **Appendix AA (revised)**.

As stated within their response, TfL have no objection to the site being serviced off the A41 but have expressly stated their opposition if the sole access route impacts on highway network or detrimentally impacts on the CS11 scheme for longer than is necessary. TfL have sought assurances from Essential Living that all measures to mitigate these impacts are utilised.

The proposed CMP seeks to minimise these impacts and has the support of TfL. An option with sole access off the A41, just utilising the “Pit Lane” for access and egress will prolong the construction programme by up to 2 years, a position that would be unacceptable to TfL.

A “Hybrid” option of access via Winchester Road for the demolition period and then all access solely off the A41 (via the Pit Lane and a secondary access point) has also been proposed by EL. This would result in a predicted programme increase of 9 months (please see **Fig. 6** for the summary programmes) due to the vehicle capacity of the Pit Lane and the requirement to delay part of the build to provide sufficient area for 2 way route through the site (please refer to [Question 2](#) for further details).

Due to the elongation of the programme in the “Hybrid” option, this scenario would not be supported by TfL. However, they have suggested a slight amendment to this option so that the use of Winchester Road post demolition is permitted throughout the build programme with approval in writing from Camden Council and TfL, and that such use will be ‘minimised as far as is practicable’

In this new Hybrid scenario, access will be required via Winchester Road during the demolition period only. Access solely of the A41 for demolition would be impractical for the following reasons:

- The constrained nature of the site makes it unsafe to turn all lorries on site;
- A requirement to close traffic lanes on the A41 to allow cranes access to the site. This is not a position that would be supported by TfL or Essential Living; and
- A significant increase in the programme due to the vehicle capacity restrictions with construction traffic impacting local residents and stakeholders for longer.

Access via Winchester Road and Eton Avenue will be required to be retained for **Emergency Vehicles** only throughout the construction period and the buildings’ operational lifetime, therefore the amendment to the market will be required going forward, but without the need for trucks to pass through post demolition.

2. Impacts of a 5 Year Construction Programme

As set out in **Appendix Z** of the CMP we have reviewed many options for accessing the site, with **Fig.1** below setting out the constraints to the access and egress of the site.

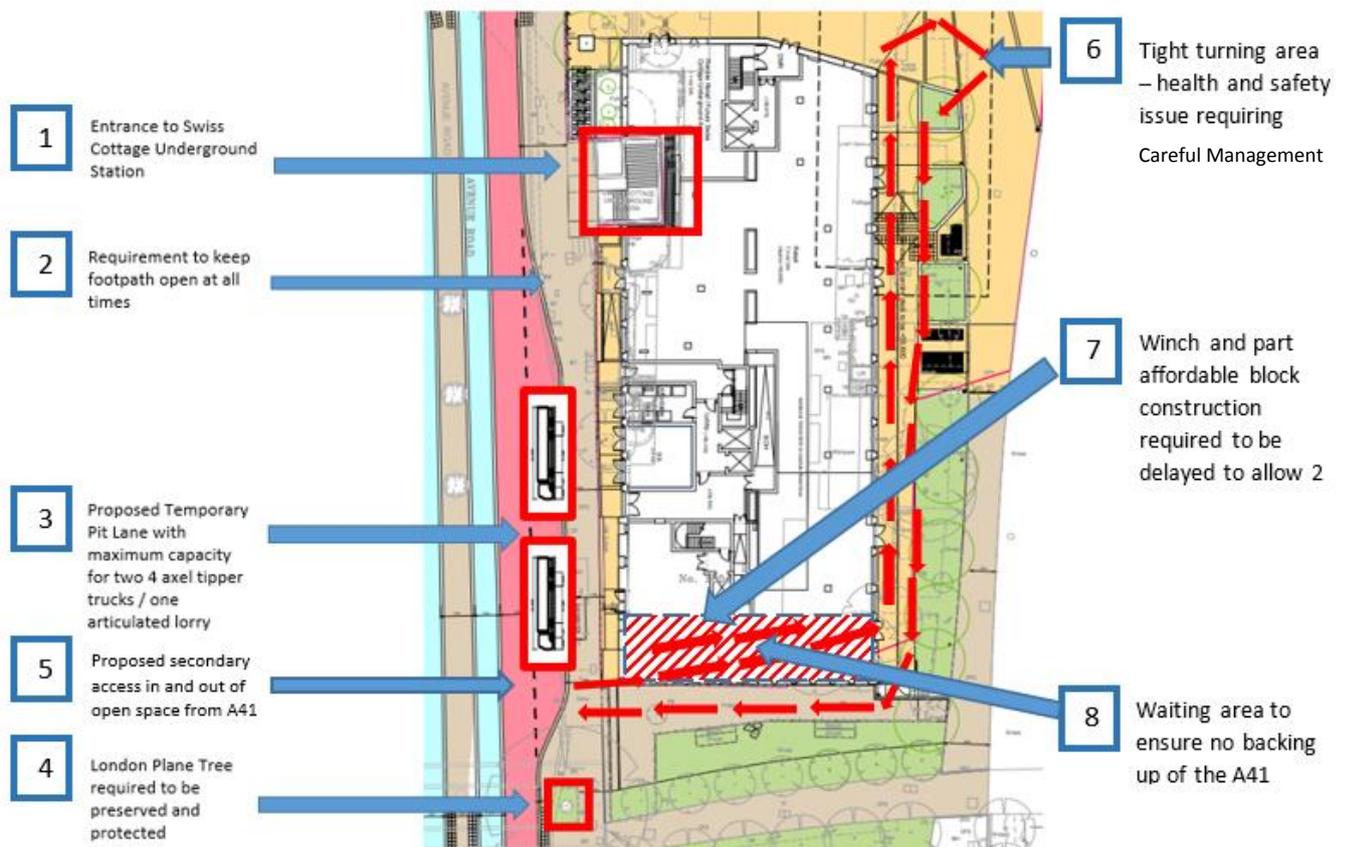


Fig. 1 – Site Constraints

A single point of access off the A41 via the “Pit Lane” has been discounted as impractical due to the impacts on construction logistics resulting in a prolongation of the programme by up to an estimated 2 years. This is due to two main reasons, namely:

- A two-stage process resulting in buildings being constructed separately
- Restricted capacity for lorries to service the site; and
- Limited access to the tower resulting in the double handling of materials across the site.

An alternative option would be to use Winchester Road for the demolition phase only with construction and fit-outs being undertaken from the A41 via the Pit Lane and the secondary access point. It has been estimated this would increase the programme by 9 months and although this is better than the “Pit Lane” only option it is not TfL’s preferred solution given the extended impact on the A41.

Programme impacts from the site constraints set out in **Fig.1** are due to:

Restricted Capacity of the Pit Lane

The “Pit Lane” is restricted to 28m in length, **(Point 3)** due to the London plane tree **(Point 4)** and bus stop to south, and the Swiss Cottage London Underground entrance **(Point 1)** to the north, limiting the capacity of the Pit Lane to 48 vehicles per day.

There may be periods, that due to unforeseen circumstances that capacity is exceeded and construction vehicles queue back onto the A41. This could lead to:

- Disrupt the free flow of vehicle traffic leading to an increase in traffic congestion;
- Blocking of CS11 leading to conflict with cyclists and safety ramifications; and
- Obstruction of the Bus Lane which will have knock-on adverse impacts again to the highway safety as well as to bus routes and the reliability of local services.

Having a secondary access point off the A41 **(Point 5)** is therefore critical to minimising these negative impacts.

Delayed Construction of the Winch (Hybrid Option – not supported by TfL)

As can be seen in **(Point 6 and 7)**, the logistics of having 2-way vehicle movement within a constrained site will be challenging and will require the delay of the construction of the Winch Community space and part of the affordable block until the rest of the site is complete **(Point 7)**, causing a delay in the overall programme.

The use of a 2-way route through this area **(Point 8)** will result in a reduced vehicle capacity on-site compared with a single route through the site due to the increased requirements to pause vehicles whilst others are manoeuvred into position and turned around on-site causing further delay and an increased health and safety risk.

In order to gain TfL agreement of two access points off the A41 in the Hybrid option, it will be imperative that vehicles turning into the site do not block this main arterial route into London. Without a waiting area there is a high probability that vehicles will wait on the A41 for space to clear prior to turning into the site. Therefore the area hatched red **(Point 8)** will be utilised as a waiting area thus minimising waiting time on the A41. This will result in the requirement to delay the construction of this part of the building and with the resulting prolongation of the programme is not the TfL, LBS or Essential Living preferred option.

To further minimise this risk of queuing and overflow, a vehicle booking system will be implemented with the arrival of construction vehicles at the Pit Lane and the secondary access point actively managed.

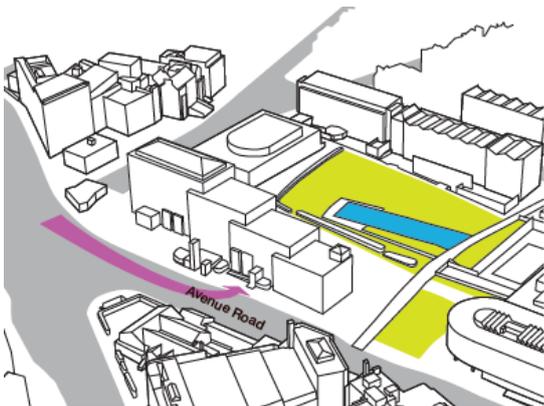
Increased Construction Period

The most efficient method to constructing this project is to access the site via multiple routes including via Winchester Road / Eton Avenue (as proposed in the CMP). Any limitations on access will restrict the access of materials to the site in particular to the tower to the north due to its distance from the “Pit Lane” and the constrained nature of the site.

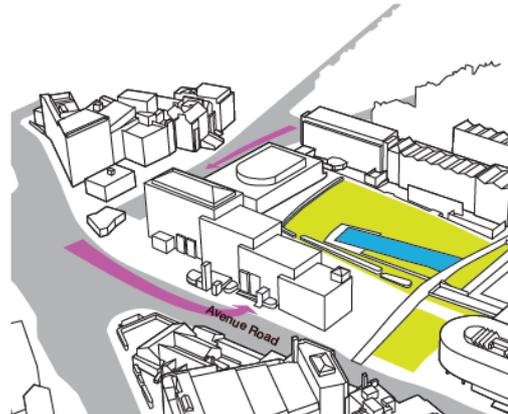
The following phasing diagrams (**Figs 2 – 5**) set out the impacts on each phase of the development when restrictions on access to the project are included:

Demolition Phase

Single Access Point



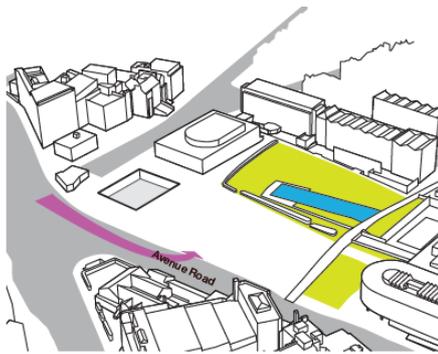
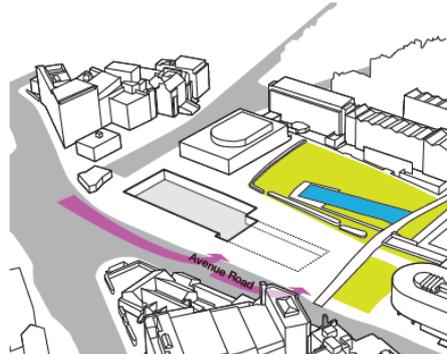
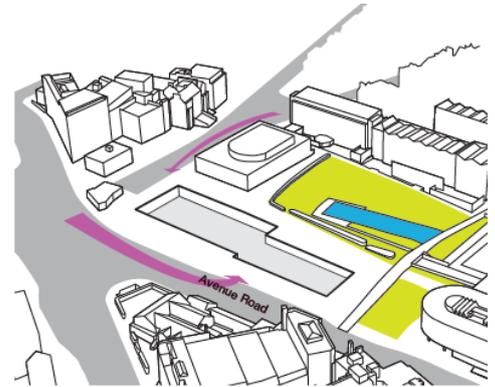
Two Access Points



- Single access point will prolong demolition due to the constraints of accessing the full site and the limits of vehicles being able to remove the waste from site
- Requirement to block lanes off the A41 to allow outrigger lorries access to site impacting bus movements
- High probability of congestion of public highway and conflict with the free flow of vehicle traffic to the detriment of highway safety
- Difficulty to phase demolition works around theatre events as work can only progress from south to north

- Multiple access points allows swifter more efficient demolition reducing impact on local stakeholders
- No requirement for closure of any lanes of the A41
- Ease to programme demolition works around theatre schedule as work can be scheduled to the north or to the south of the site due to 2 entry and egress points depending upon the performance schedules

Fig. 2 – Demolition Phase

Basement & Enabling Works
Single Access Point

Hybrid Access

Two Access Points


- Impact of restricted access limits the ability to run concurrent activities
- Single point access requires all demolition activities completing before the commencement of any substructure works, which includes enabling and piling activities
- Substructure work limited to tower only
- Single access points leads to a high probability of vehicles backing up onto the A41
- Not supported by TfL

- Two access points off the A41 reduces the risk of vehicles backing up onto the A41 if the Pit Lane reaches capacity but is not supported by TfL's
- Substructure works can be extended but not to the full extent of the area

- Multiple access points allows concurrent activities, resulting in a more efficient excavation phase
- Substructure works may commence on both blocks simultaneously
- No backing up of A41 or requirement to shut any lanes

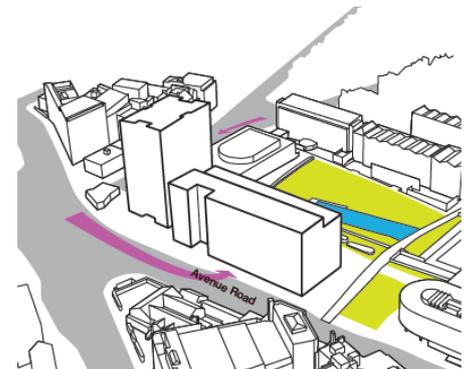
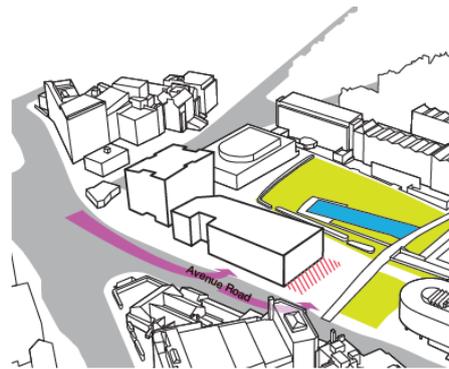
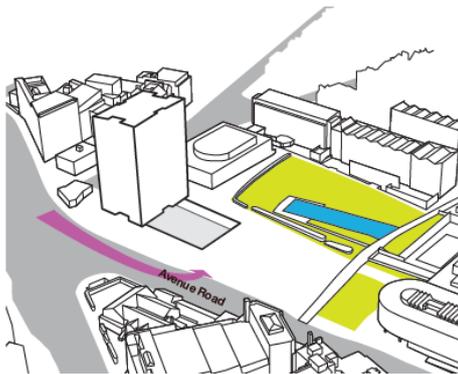
Fig. 3 – Basement and Enabling Phase

Construction Phase

Single Access Point

Hybrid Access

Two Access Points

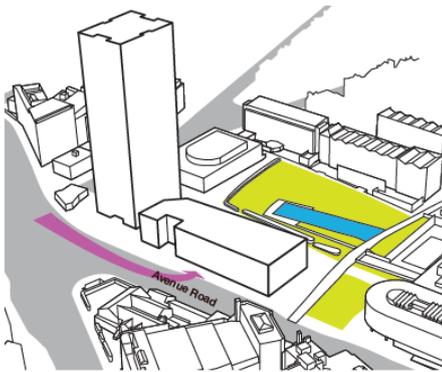
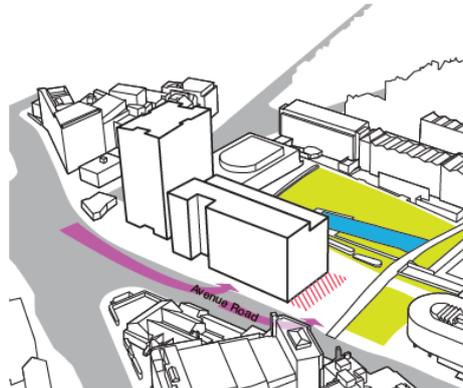
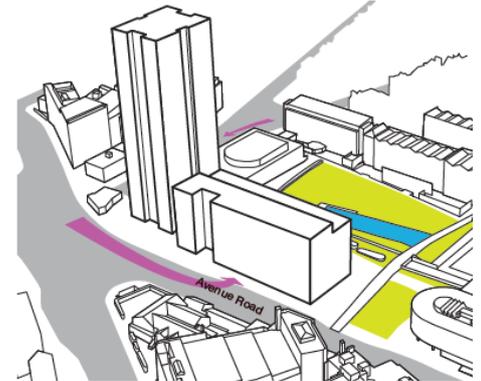


- Requirement for lower building area to be used as construction material lay down area due to limitations of pumping concrete over a large distance, resulting in the need for a static concrete pump
- Further delays will be caused by the requirement to double handle materials from the lorries to the construction lay down area and finally to the tower leading to inefficiencies
- The construction of the tower will therefore be built prior to any commencement works of the lower block

- Two access points off the A41 means superstructure works may commence on the tower and part of the lower block
- Part of the lower block (part of the Winch and Affordable Block - hatched red) is required to be delayed to allow vehicle access to the rear of the site
- Concrete for both blocks can be poured directly from wagons resulting in a quicker build than a single access point but delays to the lower block prolonging the overall programme

- Multiple access points means superstructure works may commence on both blocks at the same time
- Concrete for both blocks can be poured directly from wagons resulting in a quicker build and less space to be used for construction materials
- Multiple routes is the most efficient method resulting in the quickest and safest programme

Fig. 4 – Construction Phase

Construction Phase Continued
Single Access Point

Hybrid Access

Two Access Points


- Fit out of tower is undertaken prior to the commencement of the lower block due to the constraints of a single access point
- The increased pressure associated with operating in a more constrained environment increases the health and safety risk associated with delivering the project
- The delay in fitting out the lower block results in a prolongation of the programme

- Access off the A41 means superstructure works are delayed to Block B
- But fit out works to the tower and the majority of affordable element of Block B can commence earlier and can be undertaken concurrently
- Construction and fit out to the Winch area and remaining affordable block (hatched red) delayed to allow vehicle access to the site
- Increased risk of tailbacks on the A41 due to the requirement for scissor gate access to the site resulting in possible delays accessing off the A41 across pedestrian paths
- Health and Safety risk associated with delivering project with such constrained access points
- A quicker programme than the sole use of the pit lane, but the delay to the Winch completion extends the programme

- Multiple access points results in superstructure works finishing faster
- Fit out works for tower can commence earlier, with Block B fit out being coordinated to complete at the same time as completion of Block A resulting in an overall quicker programme

Fig. 5 – Construction Phase Continued

3. Judicial Review of CS11 Scheme

Essential Living is aware that the CS11 Scheme has been Judicially Reviewed and that TfL are now reviewing their options.

In light of this, **Appendix Z** covers a temporary option whereby CS11 is delayed by a few months and Essential Living commence their works first. **Appendix Z** also covers an arrangement if CS11 were to be delayed indefinitely.

In summary, should there be a prolonged delay to introducing the Pit Lane, an interim layout for Bus Stop D (adjacent to the development site) provides drivers a safer exit from the site onto the A41 but also allows for a limited number of vehicles to access the site from the A41. This is shown in Fig 1 below.

Should the CS11 scheme be delayed further, the Pit Lane will need to be introduced within the existing layout of Avenue Road. See Fig. 2 below. With Bus Stop B being enhanced to absorb the buses diverted from Bus Stop D



Fig 1. Interim Layout
CS11 delayed 3 – 6 months

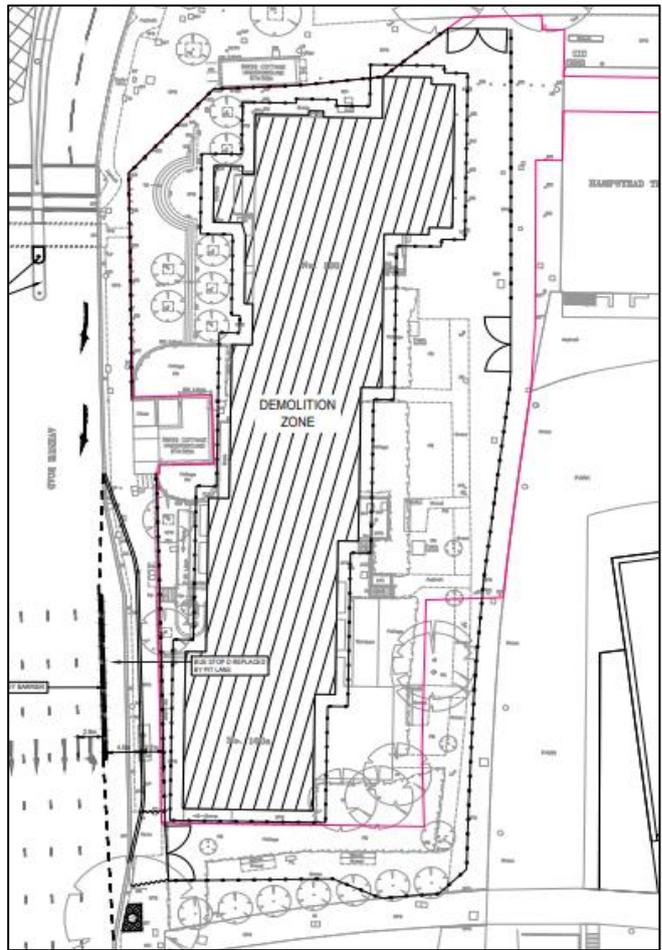


Fig 2. Extended Layout
CS11 delayed 6 months+

Demolition Phase (no CS11)

During the demolition phase, there is little difference between the 'with' and 'without' CS11 scenarios as demolition is likely to occur before Phase 5 of the CS11 scheme starts.

During demolition, simultaneous left-in and left-out vehicle movements can be accommodated at the A41 access for both the 'with' and 'without' CS11 scenarios.

The below Figures 3 to 6 sets out the proposed vehicle movements during this phase.

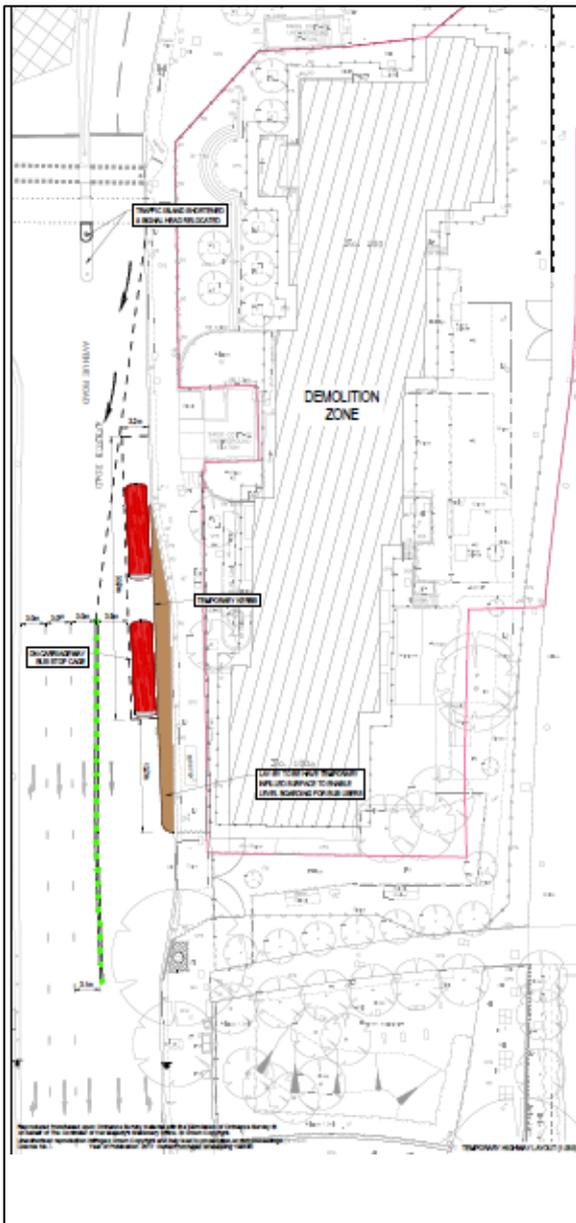


Fig. 3 – A41 works

- On-site carriageway Bus Stop
- Temporary Lane barrier separating bus stop
- Installation of temp kerbs to enable level boarding
- Traffic islands shortened and signal head relocated
- A41 part lane closure to allow safe entry / exit to site

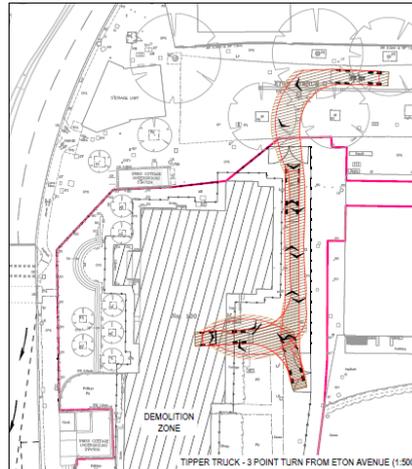


Fig. 4 – Eton Avenue Access
- Access and egress via Eton Avenue



Fig. 5 – A41 Access and Egress
- Entry and Exit via the A41

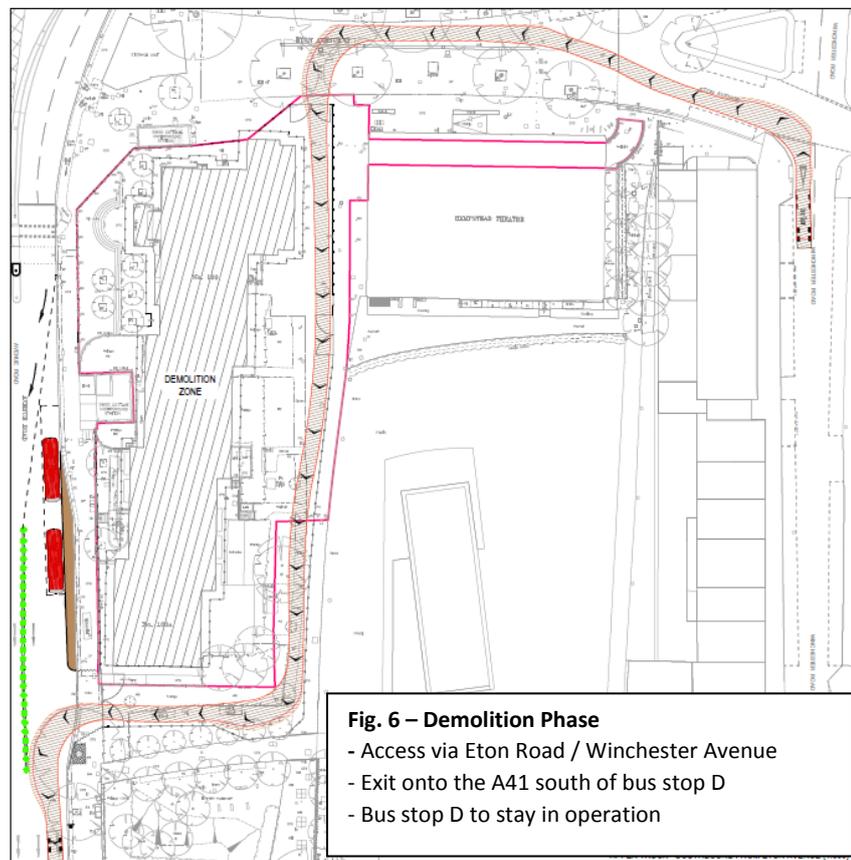


Fig. 6 – Demolition Phase
- Access via Eton Road / Winchester Avenue
- Exit onto the A41 south of bus stop D
- Bus stop D to stay in operation

Construction Phase (No CS11)

For the construction and fit out phases the traffic cones/ barrier adjacent to the Pit Lane are retained in the 'without' CS11 layout. This provides vehicles exiting the site and Pit Lane with more protection from A41 traffic flows. There is a small difference to the Pit Lane exit taper between the 'with' and 'without' layouts to retain more of the existing kerb in the 'without' CS11 layout.

During construction and fit out, simultaneous left-in and left-out vehicle movements cannot be accommodated at the A41 access in either the 'with' and 'without' CS11 scenarios. If there are further restrictions on the use of Winchester Road this issue becomes more critical as the number of vehicles turning left-in and left-out will increase. To maintain simultaneous vehicle movements at this access, construction of the southern end of the building would need to be delayed (see Drawing No. 42437/5501/112). This explains the approximate 9 month extension to the programme if Winchester Road is not used during the construction and fit out phases as previously suggested.

In the 'with-out' CS11 scenario it is proposed Bus Stop D is suspended with bus travellers using an enhanced Bus Stop B located just north of the College Crescent junction.

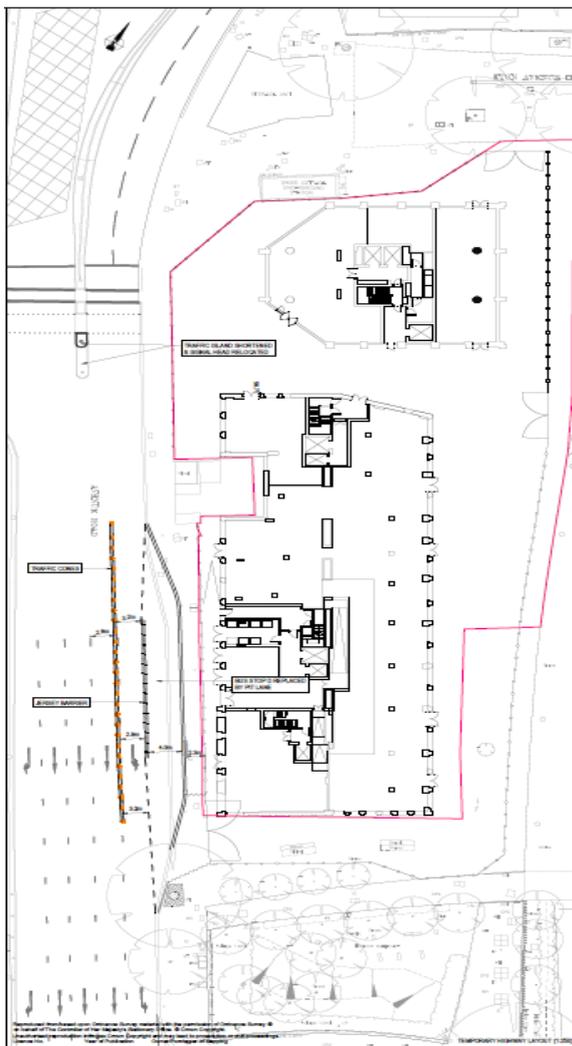


Fig. 7 – Construction Phase
 - Bus stop D replaced by "Pit Lane"
 - Bus Stop B enhanced
 - Jersey barrier and traffic cones installed
 - A41 part lane closure to allow safe entry / exit to site

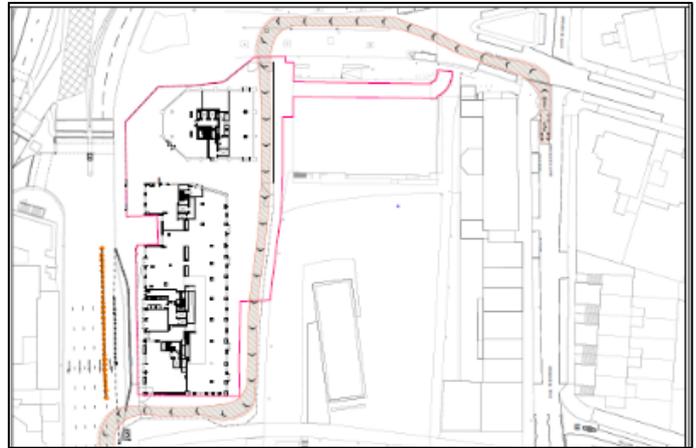


Fig. 8 – Construction Phase
 - Limited access through the site exiting onto the A41
 - Entry / Exit to Eton Road not required in Hybrid Option
 - This route could be reversed with entry off the A41



Fig. 9 – Vehicle Tracking
 - Tracking of vehicle movement through the site and Pit Lane

4. Confirmation that the CMP is in accordance with the S106 Agreement & Demonstrates *minimal possible impact on environmental and highway network*

The applicable s106 Clause 3.5.3 states:

The Owner acknowledges and agrees that the Council will not approve the Construction Management Plan unless it demonstrates to the Council's reasonable satisfaction that the Construction Phase of the Development can be carried out safely and with minimal possible impact on the disturbance to the surrounding environment and highway network.

Over the last year Essential Living has been reviewing the construction logistics of the site to ensure that the solution that minimises impact is reached.

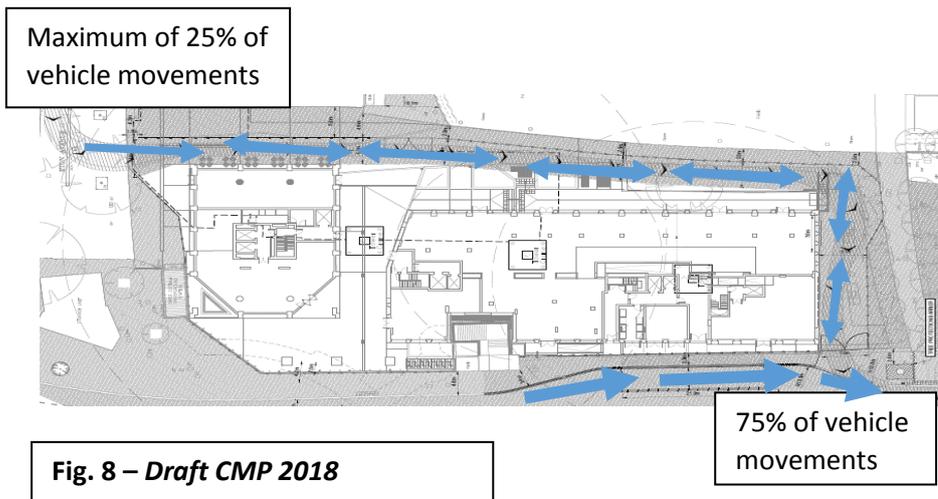
The draft CMP submitted at planning application stage and forming part of the approved planning documents in 2016 (**Appendix X**) shows 100% of construction vehicles accessing site via Winchester Road and Eton Avenue, as per the below diagram.



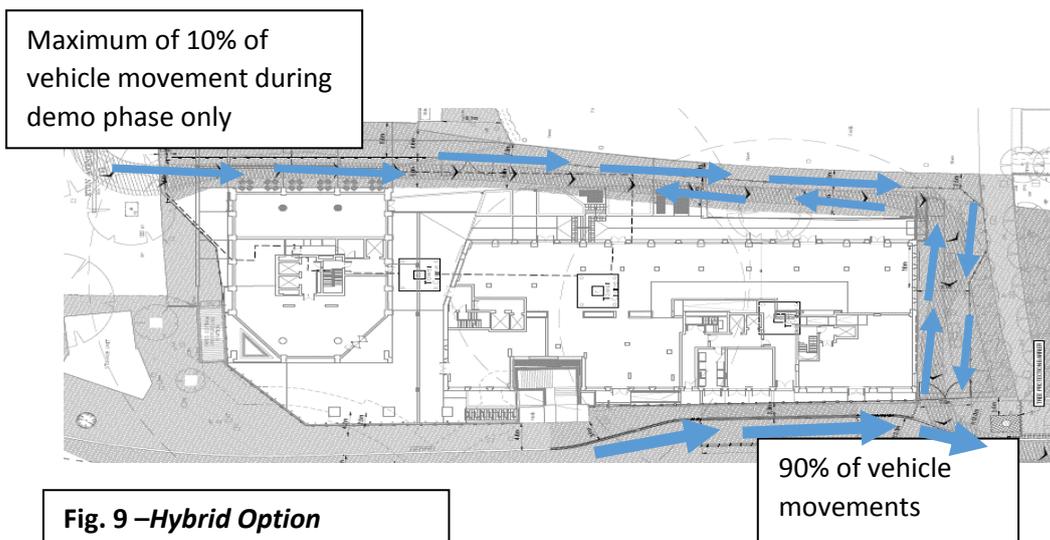
Fig. 7 – Draft CMP 2014 –Approved Planning Documents, app. Ref. 2014/1617/P

Essential Living has made significant improvements over the last year following consultation with TfL, as it is now proposed that at the peak use only 7 vehicles will be entering and exiting the site, totalling 14 movements via Winchester Road. If the Hybrid Option is preferred, these movement would be during the demolition phase only.

Our preferred option to use the A41 and Winchester Road will reduce vehicle movements along Winchester Road by 75% demonstrating that the solution presented is one of minimal possible impact and disturbance to the surrounding environment and highways network equally as required by 3.5.3 of the s106.



The “Hybrid” option, with the use of Winchester Road and Eton Avenue for the demolition phase only, after which a clear route will be kept to site for emergency services but no construction vehicles will use this access for the main construction phase. This would reduce movements along Winchester Road by up to 90%. As previously set out this will increase the impact on the area for longer and is not the preferred solution of TfL.



From a recent traffic survey undertaken along Winchester Road, there are currently 702 two-way vehicle movements on Winchester Road during the hours of a day when construction vehicles will be permitted (i.e. 9.30am to 3pm).

The addition of 14 vehicles (7 each way or 14 one-way) equates to less than a 2% increase in vehicles travelling along this sensitive route.

5. Facilities in Place for Noisy Works and Dust Suppression

Adherence and compliance to Condition 24 of 2014/1617/P (real time particulate air quality monitors) has been stated in the CMP along with Camden's Considerate Contractor Manual with all control methods having been agreed by Camden Council technical team.

Our full Dust Risk Assessment is contained within **Appendix S** which will be fully adhered to along with techniques to control dust emission from construction in the First Schedule of the S106 Agreement. The Air Quality and Dust Management Plan in **Appendix M** outlines the dust monitoring and mitigation strategy. Page 45, 46 & 47 of the CMP documents also detail dust suppression measures that will be used.

As shown in **Appendix L** noise and vibration monitors will be placed in key locations and data from these will be uploaded in real time to an agreed website, details of which will be placed on the notice board. If the noise exceeds the agreed DB limit, Essential Living will temporarily stop works to assess what is causing this and address the issue accordingly. **Appendix L** also details the monitoring strategy that will be implemented.

In addition, Essential Living commits to appointing an independent monitor, to be chosen by the construction working group, which will monitor noise, dust and vibration to ensure that the legal limits are not breached.

Page 44 of the CMP document also details the location of the acoustic blankets that will be installed during demolition.

6. Tree Protection

Tree protection is dealt with under condition 21 which was approved on 27th June 2016. The measures detailed in this condition include tree protection fencing, a construction exclusion zone, and avoiding root zones and canopies. For more details please see Camden’s planning portal and search 2014/16/17/P and find the entry under Condition 21.

The London Plane tree on the pavement of the A41 is not within Essential Living’s demise, and is a Highway Tree. However this tree will be a priority to protect due to its proximity to vehicle movements. We are committed to its protection and will seek full agreement to our protection measures proposed as part of the CMP.

Essential Living will commit to further exploratory research on tree root zones beneath the pavement surfacing and the appropriate barriers, matting and/or bridging to be put in place in order to protect this tree.

A full method statement will be provided with measures likely to include a transition ramp with matting (as shown below) to protect the tree roots along with tree barriers to protect the trunk.

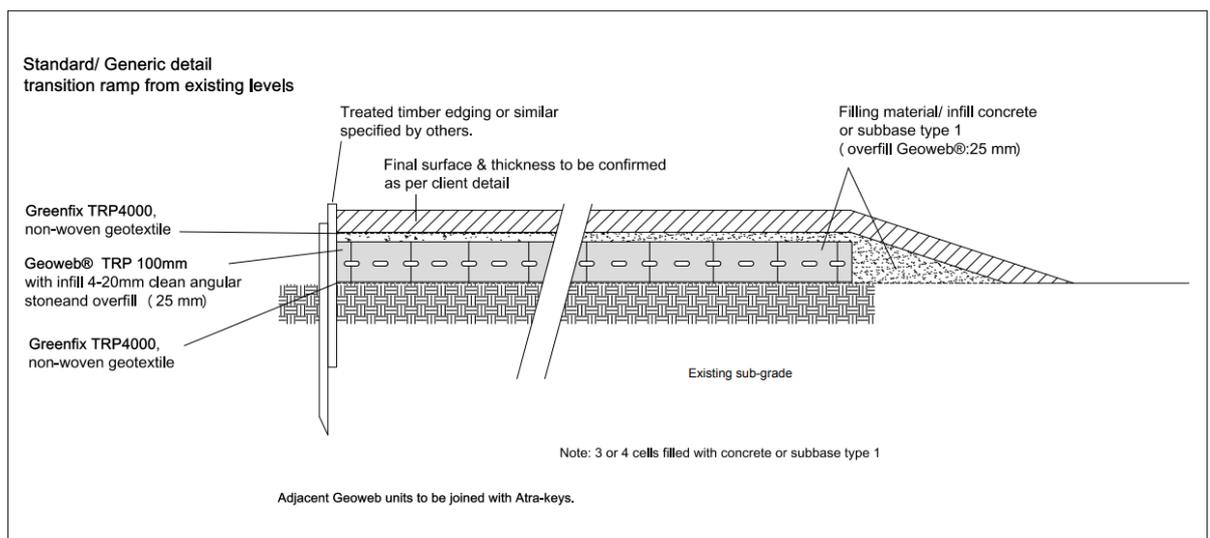


Fig. 10 – Proposed root mitigation measures

7. Types of Vehicles Being Used

The phasing diagrams in **Appendix F** of the CMP show the number of movements per phase and also what types of vehicles being used in each phase. **Appendix A** of the CMP further details the types, supporting pages 29 & 30 of the Construction Management Plan document.

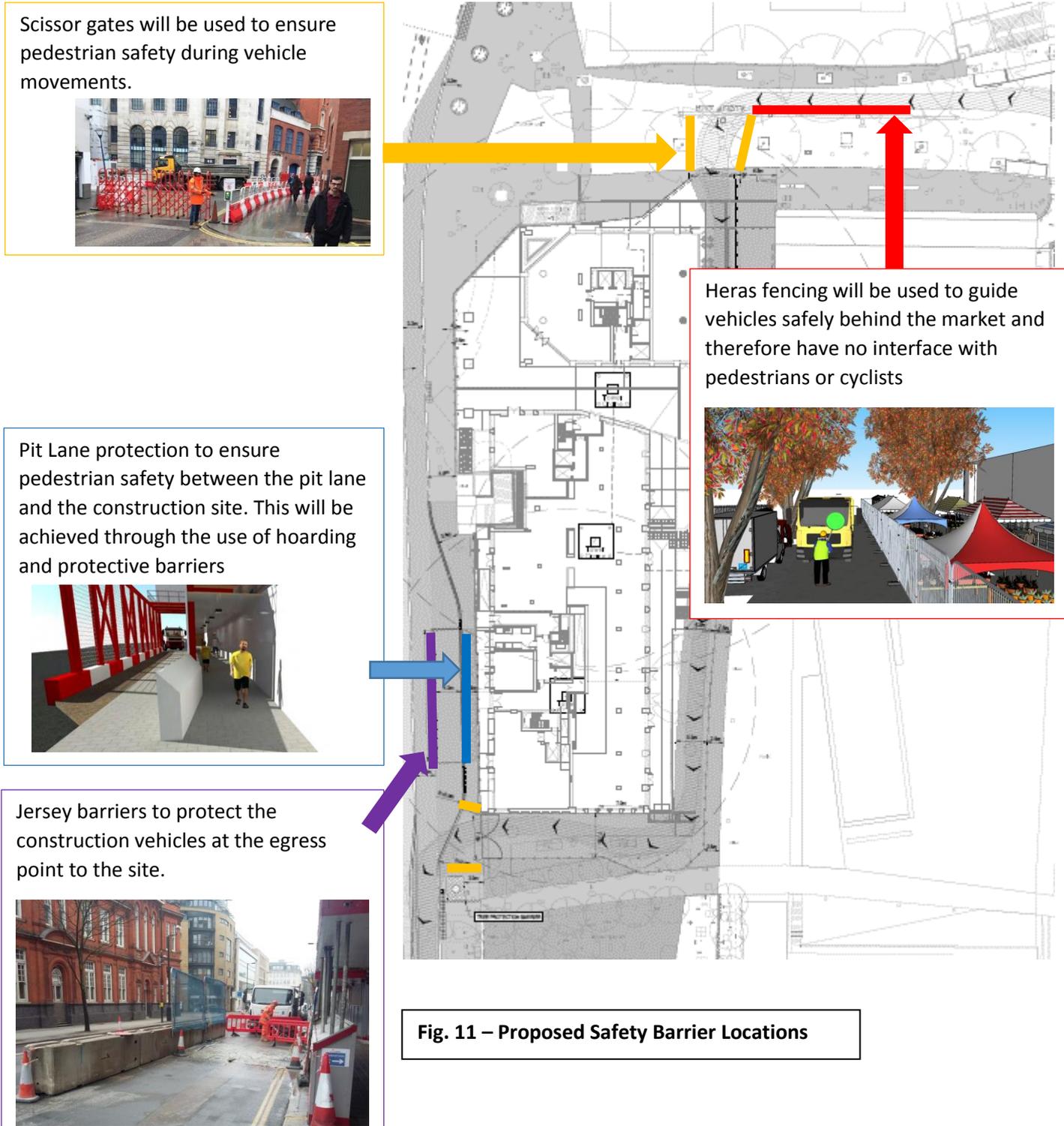
In terms of air quality, construction vehicles used will adopt green fleet management practices that will result in a 10% reduction in tail pipe CO2 emissions over the duration of the construction phase. The Main Contractor will also abide by a FORS scheme standard.

8. Suggested Barrier Systems

Essential Living are fully committed to maintaining pedestrian and cyclist safety throughout the construction of 100 Avenue Road.

We are proposing the use of barriers which will be fully controlled by trained marshals at points where vehicles are required to cross public routes.

The following plan, identifies the location of the barriers:



9. Market Officer Proposed

Essential Living has been in discussions with Camden Market Officers over the last year regarding the amendment to the market during the construction of 100 Avenue Road.

The proposal seeks to create a pedestrian friendly market 'street' with the market traders' vehicles parked away from the stalls. To effectively implement this, EL has undertaken to take steps to provide electricity supply to the stalls.

In addition on Wednesdays, the busiest day, Essential Living will fund an additional market officer to assist setup/pack up. It is our understanding that for the remainder of the week limited stalls are present and on-going discussions will take place over whether additional resources will be required.

The rationalised market layout is below with a more detailed plan provided in **Appendix AB** of the CMP.

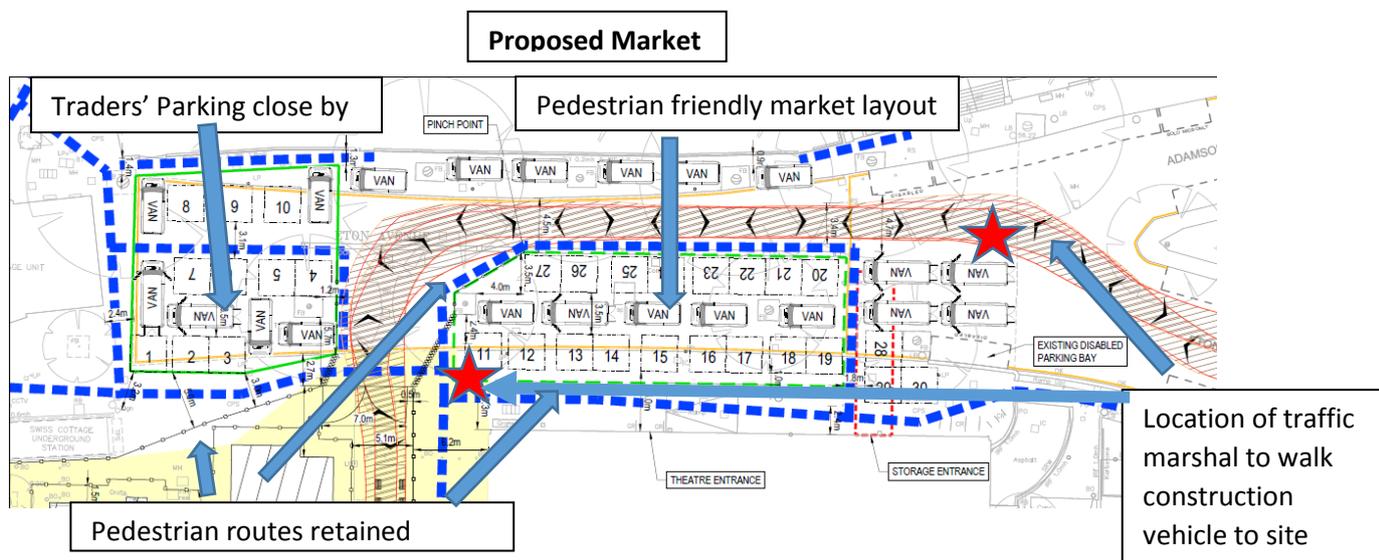


Fig. 12 – Proposed Market Alignment

Current Market Layout
Vans and stalls together



Proposed Market Layout
Segregated vans and stalls



This amended market layout will be permanent in order to maintain a clear access route to the site for emergency services as well as Camden Council's park maintenance team post demolition phase.

10. Alternative Access Options Considered

Various site access routes were considered during the preparation of the CMP. These routes along with summaries of any conclusions reached are set out in **Appendix Z** of the CMP.

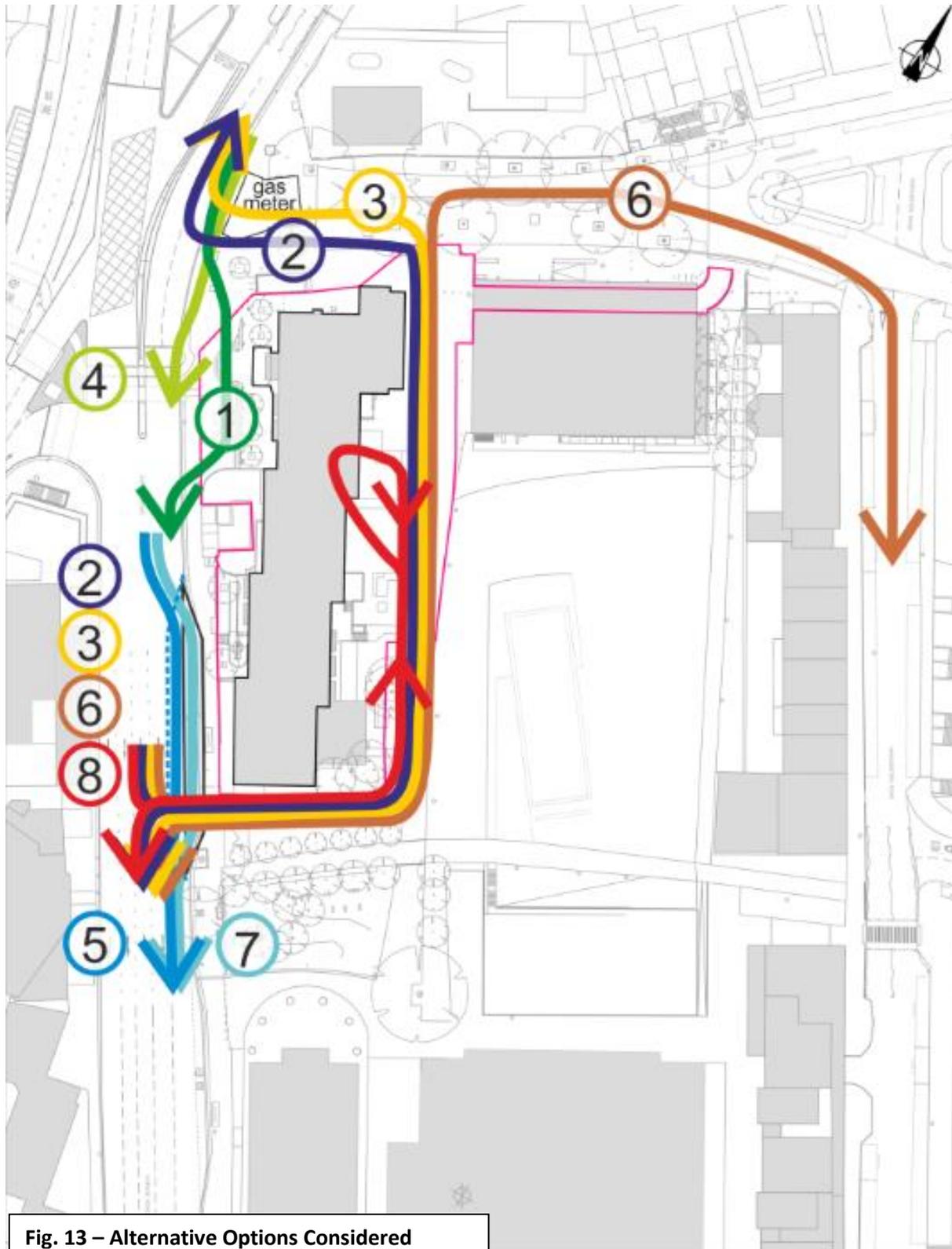


Fig. 13 – Alternative Options Considered

A summary of each option is as follows.

Option 1

Vehicle loading area located within the site between the two London Underground (LU) station entrances on Avenue Road. The access route would involve vehicles travelling down College Crescent rather than directly off the A41 resulting in an increased chance of vehicles backing up the A41 and blocking of buses whilst they turn into College Crescent (currently a bus only turn).

Vehicles would also need to cross the footway from College Crescent to enter and exit the loading area. The key constraints are:

- Safety issues related to vehicles crossing busy footways in front of entrances to the Swiss Cottage Underground station.
- Vehicle access route conflicts with the proposed location of a CS11 pedestrian and cycle crossing which will attract high levels of pedestrian activity.
- The vehicle access and egress routes would have to bypass a temporary crossing proposed as part of the CS11 works.
- Increased risk of left-turn hooks between cyclists and construction vehicles.
- Route runs over LU assets that include a pedestrian subway and ticket hall.

This option was rejected because of safety concerns related the high level of pedestrian and cycle activity at the existing and proposed CS11 crossings.

Option 2

This was rejected for the same reasons as Option 1 with additional impact on the major gas infrastructure and market storage facilities.

Option 3

This was rejected for the same reasons as Option 1 and 2 with the additional impact of the enabling works being highly disruptive.

Option 4

This was rejected on inefficient and potentially high risk site logistics combined with pedestrian and cycle safety concerns along with the requirement to turn into College Crescent at a bus only junction.

Option 5

This was rejected because of the extent of the impact to the CS11 scheme.

Option 6

This was recommended to be retained as a construction vehicle route but supported by a Pit Lane on the A41 (see Option 7) to substantially reduce the number of vehicle movements along Winchester Road and Eton Avenue.

To address local resident concerns, the number of vehicles movements will be limited to 14 per day (14 one-way or 7 movements two-way).

Additional measures to mitigate the impact of these limited construction vehicle movements throughout the period of works will include:

- Limited operational hours to avoid vehicle movements during the commuter peak periods and including the start and the end of the school day.
- Support to rationalise and manage the layout of the market stalls, ensuring any impact on traders and their businesses is minimised.
- Active traffic marshalling along Eton Avenue to ensure a safe environment for pedestrians and cyclists is maintained.

Option 7

This option is recommended as the sites' main construction vehicle access point (for either the Draft CMP 2018 vehicle routing proposal or the Hybrid Option) for the following reasons:

- Allows for the efficient movement of materials to and from the site helping to achieve the construction programmes for the development.
- Site hoarding can be adjusted to ensure an adequately wide footway adjacent to the Pit Lane.
- A vehicle booking system will be implemented to reduce the risk of vehicles blocking back into the CS11 Bus Lane.

Option 8 (for "Hybrid" option)

Recommended to provide a secondary access and egress point to the site via the A41, which will be used to avoid any disruption or increased road safety concerns as a result of vehicles being unable to access the "Pit Lane" for unforeseen circumstances.

This secondary access point is constrained due to the existing basement, new building cores and site boundary and therefore requires the delay in the construction of part the Winch Community area and part of the Affordable Block to allow a 2 way access and layby area on the site. This will impact on the programme compared with a single route through the site (via Winchester Road).

Please see **Appendix Z** of the CMP for more information on considerations that formed whether or not these options would be viable.

11. Objectors Claim Mayor Said all Work from A41

During the last Committee, one objector claimed the Mayor said the scheme could be exclusively constructed from the A41. We understand they are referring to a written answer given in response to the Mayor's Question Time on 21 June:

"...TfL has worked closely with the borough to ensure a construction plan which prioritises the safety and convenience of pedestrians and other vulnerable road users. The plan is now with the London Borough of Camden for approval. Construction will not start until this plan has been agreed...TfL has no objection to all lorries using the pit lane so long as the bus lane and traffic lanes are not blocked. This will be the responsibility of the developer and its logistics managers..."

The Mayor's comment of, "...so long as the bus lane and traffic lanes are not blocked", is most relevant to what may be considered as being acceptable and reasonable in accordance with the point made in [Question 3](#) above, regarding S106 Clause 3.5.3.

As the technical note in **Appendix Z** of the CMP states, there is significant benefit to having access via Winchester Road as this minimises any potential for blocking of the A41. All other options, including the "Hybrid" option will increase the likelihood of blockages due to there being no backup access to the site as all access points post demolition would be off the A41.

TfL's most recent response to the CMP can be found in **Appendix AA and Appendix Aa (update)**.

12. Air Quality Summary

From a recent traffic survey undertaken along Winchester Road, there are currently 702 two-way vehicle movements on Winchester Road during the hours of a day when construction vehicles will be permitted (i.e. 9.30am to 3pm). The introduction of 7 extra trips per day (2% increase) during the demolition phase only would therefore have a negligible increase in air quality levels.

Essential Living have also committed to reducing carbon emissions through the adoption of their Energy Efficiency and Renewable Energy Plan. Air Quality monitoring will also be undertaken with a trigger level of PM10 Concentrations larger than 200ug/m³, as per Condition 24. Were this to be exceeded, Essential Living will temporarily stop works to assess what is causing this and address the issue accordingly.

Essential Living are committed to undertaking construction in line with the Best Practice Guidance note “Control of dust and emissions from construction and demolition” published by London Councils. 100 Avenue Road is also a car free development.

The following air quality mitigation measures are proposed in **Appendix M**, including:

- Engines of all vehicles and plant on site are not left running unnecessarily
- Using low emission vehicles and plant fitted with catalysis, diesel particulate filters or similar devices
- Using ultra low sulphur fuels in plant and vehicles
- Plant will be well maintained, with routine servicing of plant and vehicles to be completed in accordance with the manufacturers recommendations and records maintained for the work undertaken
- All project vehicles, including off-road vehicles, will hold current MOT certificates where required due to the age of the vehicle, (or to be tested to an equivalent standard) and that they will comply with exhaust emission regulations for their class
- Avoiding the use of diesel or petrol powered generators and using mains electricity or battery powered equipment
- Maximising energy efficiency (this may include using alternative modes of transport, maximising vehicle utilisation by ensuring full loading and efficient routing).
- All Non-Road Mobile Machinery (NRMM) will be Stage IIIA emission Criteria compliant, If Stage IIIA equipment is not available, NRMM should be fitted with particle traps and/or catalytic exhaust treatment wherever possible. Records will be kept on site detailing proof of emission limits for all equipment.

13. Open Space Licence

Once the CMP is approved, Essential Living will still need to agree a licence with London Borough of Camden as a landowner to use a strip of the parkland for access and egress from site onto the A41. This license is critical to minimising the use of Winchester Road and Eton Avenue and without it we will be forced to reassess our accessibility options once more.

This licence will be subjected to the usual public consultation process, which was undertaken on the 11th October 2018. A copy of the presentational material is included within **Appendix AC**

The licence will include mitigation measures for the temporary loss of open space. These measures include:

- 1) Green hoarding, integrated lighting and CCTV



Fig. 14 – Proposed Hoarding Design

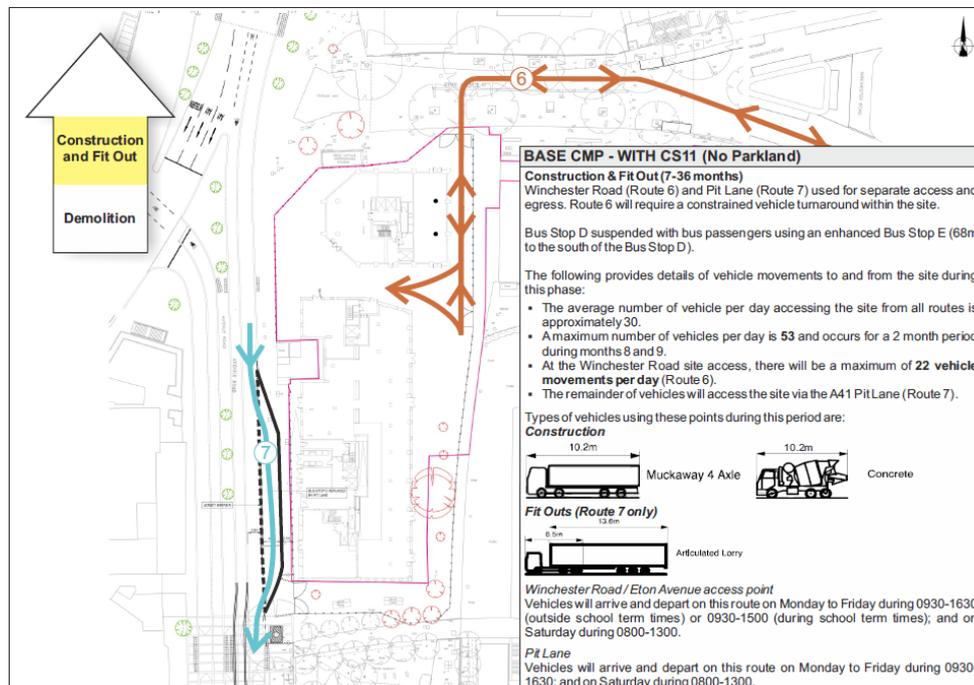
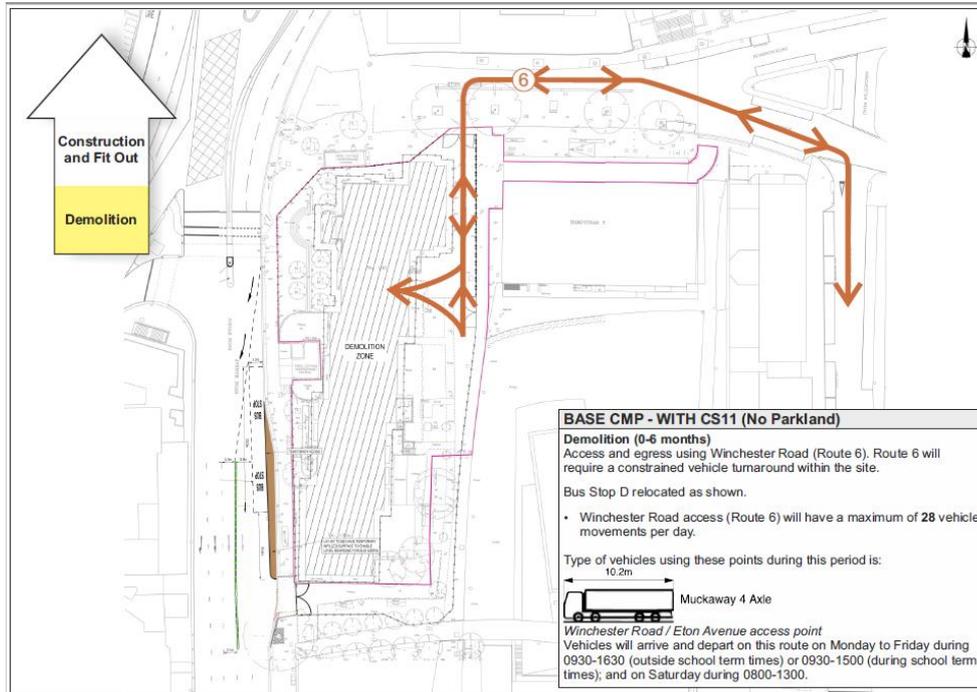
- 2) Option for improvement of the play space



Fig. 15 – Proposed Playspace Enhancement

For more information please see **Appendix Y** of the CMP

The following diagrams sets out the predicted vehicle movements, if the Parkland cannot be utilised (please see Appendix F for more details):



The impact of not granting the Parkland licence would be an increase of vehicle movements along Winchester Road, from a maximum of 14 movements during the demolition phase to 28 movements and from a maximum of 7 movements per day during the construction phase to a maximum of 22.

14. Further Meetings/Discussions with TfL Regarding Sole Use of A41

Extensive discussions have been undertaken with TfL throughout the last year. Their thorough feedback can be found in the committee report. Please see TfL's formal written response on Page 38 of the Public Reports Pack for the 19th July 2018 planning committee found on Camden Council's website:

<http://democracy.camden.gov.uk/mgChooseDocPack.aspx?ID=7763>.

TfL's additional response can be found in **Appendix AA and Appendix AA (updated)**.

In addition, historic TfL meeting minutes can be found in **Appendix D1** and **Appendix V**.

Since the Planning Committee on 19th July 2018, Essential Living have engaged in further talks with TfL who confirm that the proposed CMP is acceptable to them and that the "Hybrid" option is not their preference. TfL also recognise that the draft CMP is a live document, and if any significant changes were to occur then the CMP would be reviewed.

15. Why it is Not Possible to Use the A41 and Impacts Have Been Minimised as Far as Possible

It is possible to use only the A41 during the construction phase, however the sole use of the Pit Lane is not a practical solution, given the prolongation of the programme and impacts on the A41 / CS11.

Having two access points is crucial for the following reasons:

1) Demolition

Demolition solely of the A41 is impractical due to:

- The constrained nature of the site precludes lorries being able to turnaround on site;
- A requirement to double handle materials would be necessary increasing the level of noise and dust;
- A requirement to close a number of lanes off the A41 to allow cranes access to the site. This is not a position that would be supported by TfL or Essential Living; and
- Significant increase in programme due to the vehicle capacity restrictions. Impacting local stakeholders for longer

2) Safety

It is not possible to use only one access point on the A41 and maintain a balance between pedestrians, cyclists, construction and an effective road network. The main point relates to queuing of construction vehicles down the A41 which in turn would disrupt the bus network and endanger cyclists and pedestrians. With two access points and the delay in the construction of part of the building this issue is mitigated.

3) Programme

The impact of having one access means programme will slip by an estimated 2 years. This means 2 years of negative impacts on the local stakeholders, environment and highway network. Implementing the “Hybrid” 2 access point option will still increase the programme length from our proposed CMP solution, but an estimated 9 months rather than the 2 years.

4) TfL & CS11

Access purely off one point the A41 will lead to an increased likelihood of congestion / queuing on the A41. Due to the capacity of the “Pit Lane” (2 x axle tippers), there is a greater risk that lorries will queue on the approach to the “Pit Lane” causing congestion on the A41, a main arterial route into London. This would not be supported by TfL.

Please see the supplementary technical note in **Appendix Z** of the CMP and the response to [Question 3](#) regarding the options explored and efforts employed to minimise impacts.

Essential Living have proposed the solution they see as having minimal possible impact on the surrounding environment and road network. The proposed CMP is agreed by Camden Council's planning officers and technical teams.

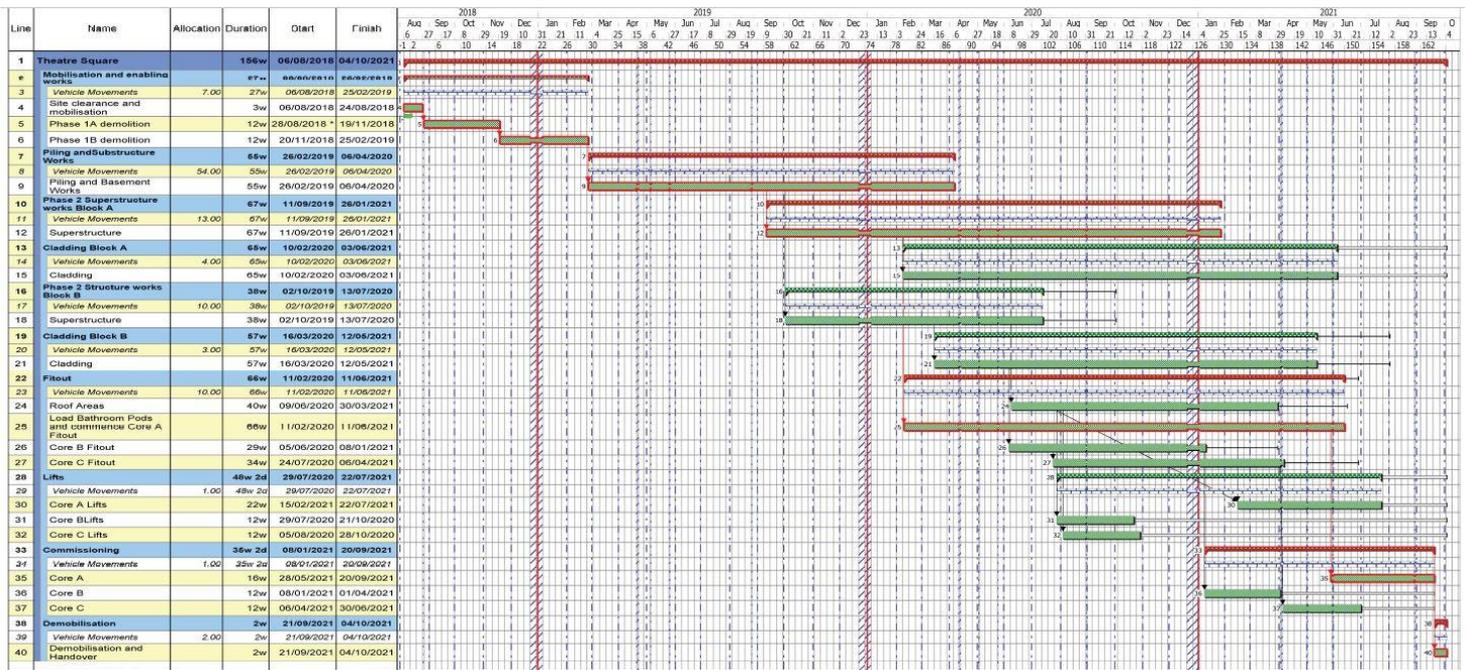
Due to the programme elongation the "Hybrid" option is not the preferred option for TfL.

16. Further Commitments made 19.07.18

- No working on Bank Holidays (restricted by planning permission/environmental protection legislation and stated on pages 15 and 42 of the CMP document)

Section 2 – Detailed Programmes

Original Programme – 2 access routes (A41 and Eton Ave), 3 years



Single Access – 1 access route off A41, 5 years

