

**Dartmouth Park Neighbourhood Forum**  
**Comments on**  
**Highgate Newtown Community Centre**  
**Demolition Management Plan**

The following are the comments of the Dartmouth Park Neighbourhood Forum (DPNF) on M&M Demolition's draft Demolition Management Plan for the Highgate Newtown Community Centre (the DMP). Numbers below refer to paragraphs in the draft DMP.

**Consultation**

The most pressing issue is the length of the consultation period, in the light of the high risk of compromising the safety of residents, school children included, and nuisance to neighbours. Especially in the current circumstances, the two week period allowed is far too short. The COVID-19 lockdown has prevented both the live meeting scheduled for 23 March and any normal word of mouth sharing of information and opinions within the local community at school gates, in the library, in local cafes and shops. A significant proportion of local residents who will be affected by the demolition do not have the computers/phones/broadband/skills to understand and/or engage in the consultation process over the internet. Some have still not received a letter. Given that many local residents in the surrounding streets and estates had been expecting a consultation meeting where they could ask questions, seek clarity and request possible amendments, the consultation deadline should be extended for at least a further 14 days. We would also ask that you set up an online conversation (via Zoom or equivalent) to allow residents with the ability to access that facility to ask questions and seek clarification.

**Commencement of construction on site**

It is not clear from the information provided when the actual construction is expected to start on site. Demolition should not be permitted until a firm date and process (given social distancing requirements) are known for the construction. There should not be an extended period between completion of demolition and start of construction, during which the site will sit empty.

**COVID -19 implications**

As a general point, the DMP does not address how the operations will be carried out while complying with social distancing and other requirements as a result of the COVID-19 pandemic. The DMP should be updated to specify how those requirements will be satisfied.

More fundamentally, we have seen and endorse the comments of the Croftdown Road Residents Association and Chester Balmore Leaseholders Association questioning why this project is going ahead at all at this time in light of the disturbance and stress it will bring to residents who are in lockdown in their homes and unable to escape the sustained noise, vibration, dust, fumes, lighting, site traffic and heavy vehicles. The imposition on local residents is excessive and unwarranted at this time.

## **Recycling and reuse**

We would strongly encourage the contractor to reuse or recycle as much material on site as possible. This will have a significant impact on the number of vehicle movements (see comment at 21c below). But even more important are the environmental benefits of recycling and, in particular, reuse. Demolishing the existing buildings is already a wasteful exercise, especially in terms of embedded carbon. The contractor should do everything possible to mitigate the resulting harm. The Sustainability Statement for the project states (in paragraph 4.14) that the principal demolition contractor will be required to produce a pre-demolition audit detailing the quantities of demolition waste predicted and any opportunities for reuse of these materials on site, plus opportunities for recycling of this at licenced local facilities. It also states that at least 90% by tonnage of the entire Site non-hazardous demolition waste will be diverted from landfill and either reused on site (for example, crushed and used as sub-base material for new hardstanding areas) or recycled by an approved waste management contractor off-site. Paragraph 4.15 of the Sustainability Statement requires the production of a Site Waste Management Strategy for all on-site activities to optimise materials resource efficiency. The DMP does not address any of these requirements. It is not possible adequately to assess the DMP without this information.

It should also be noted that the Fresh Youth Academy was refurbished at considerable expense as recently as 2015. There are presumably considerable fittings and materials that could be recovered and reused or recycled.

## **Site**

7 This paragraph states that access will be via Bertram Street. Will there be contractor access to the Church Hall via Winscombe Street? If so, details for such access should be provided in the DMP. In addition, it is stated that there will be hand separation from the adjacent property in Bertram Street. Is the same needed for the properties in Winscombe Street?

## **Working Hours**

9 The working hours need to be clarified. The Q&A circulated to some residents states that working hours will usually be 8am – 5pm Monday to Friday and Saturday working will be exceptional. However, section 9 of the DMP states that working hours will be 8.00am to 6pm on Monday to Friday and 8.00am to 1.00pm on Saturdays (If required). This discrepancy should be clarified. In addition, elsewhere in the DMP there are references to restrictions during school times and times for vehicles entering and leaving the site. All of these timings should be set out clearly and succinctly, preferably in one place. In any event, we believe an 8 am start is too early, given that the works will be taking place over the summer period and possibly when lockdown will be continuing or older or vulnerable residents may be shielding in the area. Moreover, as and when schools are open, having a significant number of trucks in motion during the hours when schools are opening or closing for the day would be highly dangerous to the numerous children, families and young people walking, cycling, or getting out of vehicles in the area. The increase in traffic in peak hours would be

intrusive in these narrow streets and there is an inevitable tension between buses and trucks on Chester Road and Raydon Street.

### **Community liaison**

10 The list of potential receptors should include all properties on Bertram Street, as well as all properties on Chester Road. If there will be access to the Church Hall via Winscombe Street, then all properties in that street should be included. All of these properties will be affected by vehicle movements and many will be affected by noise, dust, vibration, fumes and lighting.

11 We understand that some residents did not receive the Q&A referred to. In addition, it appears that at least some local community and amenity groups were not consulted. The DPNF, for example, did not receive any consultation documents directly from the contractor or Camden. A list of such consultees should be set out.

12 The DPNF should be included in the Construction Working Group ([info@DPNF.org.uk](mailto:info@DPNF.org.uk)). The frequency of newsletters should be specified. This should be no less frequently than weekly and whenever there is a material change in timings or activities.

### **Transport**

17 There should be a requirement for at least FORS silver standard.

### **Site Traffic**

18 The plan should show a wider area, to include the route to/from the Strategic Road Network.

We understand that the only access will be via Chester Road and Bertram Street, with departing traffic turning left into Chester Road and then right into Raydon Street. Chester Road is a busy narrow one way bus route. Bertram Street is an even narrower residential two-way street, while Raydon Street is also a narrow busy bus route. Given the constraints created by Chester Road, Bertram Street and Raydon Street and depending on the number of vehicle movements per day (see below), there is the potential for significant disruption and delay to local traffic. Residents have reported that over the last year (even without construction traffic) there have been more than a dozen instances when badly parked cars, wider vans, or large trucks (especially in the pull in area by the NISA shop) have caused the bus to stop and call the emergency number. In some cases this hold up lasts for hours. It is also important to take into account that the residents of Bertram St require refuse collection and perhaps emergency services or disabled vehicle access, while the 20 plus extra-large refuse bins for the Whittington Estate are collected by Veolia trucks which can also block Raydon St. The DMP should set out in detail how these constraints will be managed, and in particular how the site traffic will interact with buses on the route. In addition, it should be expressly stated that vehicles will not be allowed to back into and down Bertram Street; the manoeuvring required to carry out such an operation would be extremely disruptive to traffic and dangerous for pedestrians and cyclists.

The DMP pro forma requires the routes to be suitable for the size of vehicles that are to be used. The contractor should confirm that the vehicles proposed will be appropriate for this constrained access route. It may be necessary to consider smaller vehicles, although we appreciate that that does lead to more vehicle movements. In making that determination, regard should be had to the necessity to avoid damage to the cobbles and trees in Bertram St.

We understand that information submitted in support of the planning application suggested that a temporary access route would be formed from Croftdown Road during construction of the development. This would have the benefit of minimising the number of construction vehicles travelling to and from the site via Bertram Street. Given the constraints created by the Chester Road-Bertram Street-Raydon Street route, the DMP should address this option and explain why it has not been and cannot be adopted.

18b It is not sufficient simply to state that Suppliers will be provided with a copy of the Traffic Management Plan. There should be frequent reminders of the route and any Suppliers not using the approved route should be sent away and those routinely breaching the requirement should not be allowed to supply the site.

19 Vehicle movements need to be clarified. The Q&A refers to 20 lorry loads per day (presumably 40 movements up and down Bertram Street). Is this just for removal of debris? How does that figure relate to the numbers of movements set out in paragraph 19, which refers to no more than 30 waste removal movements per day, plus an additional 8 small vehicle movements per day and other less frequent movements? Please confirm that there is room on site to accommodate all these vehicle movements, without having vehicles parking or waiting in Chester Road or Bertram Street.

The timings for movements set out in the table in paragraph 19 also need clarification. For example, the table provides for HGV Rigid movements between 8 and 13:00 on Saturdays, while the Q&A states that Saturday working will be exceptional. How do these timings relate to the restricted hours during school days?

19c A copy of the Traffic Management Plan should be provided for comment before approval of the DMP. The swept path analyses will be critical for understanding how traffic movements into Chester Road, into and out of Bertram Street and from Chester Road to Raydon Street will be managed. The number, location, timing and duration of parking bay suspensions should be specified.

19e It is not possible to fully understand the vehicle movements without knowing how much concrete and hardcore can be recycled or reused on site. Significant recycling or reuse would make a huge difference both for demolition and construction vehicle movements. We would also urge as much recycling and reuse as possible on environmental grounds. The amount of onsite crushing could also have a knock-on effect on noise levels. Details of recycling and reuse should therefore be provided before approval of the DMP.

20b We suggest that traffic marshals are also provided at the corner of Chester Road and Raydon Street and at the top of Chester Road. There have in the past been significant issues with large vehicles turning into Chester Road and causing difficulties for other vehicles and pedestrians.

21a Please confirm that parking bay suspensions are required only for the delivery and collection of the Demolition Excavators, and that this will happen only once at the beginning and once at the completion of the project. Given that the C11 bus frequently has difficulty manoeuvring down Chester Road (for example, if large SUVs, vans or larger trucks are parked on the road), we question whether other parking bay suspensions may be necessary, especially when there are movements of the larger HGVs.

### **Street works**

23 See 21a above.

### **Environment**

28 The contractor should be responsible for monitoring noise on the site, regardless of whether Camden is monitoring. More detail is required on how noise on site will be managed and monitored: number, location and specification of monitors; maximum acceptable noise level; whether monitoring is real time; if not, how frequently the output from monitors will be checked; by whom; by whom and when breaches of the maximum acceptable noise level will be identified; how and by whom activities on site will be suspended; how the incident will be investigated. Activity on site should be suspended until the incident has been investigated and appropriate remedial measures put in place. The contractor should also be aware that Chester Balmore Estate residents are required to keep windows open during the summer to try to hold temperatures below 25C due to overheating issues which affect the units facing Chester Rd. Residents are therefore especially concerned about noise, dust and pollution, particularly if a lockdown remains in place.

More detail should also be provided about how the contractor will carry out the break-up of the thick concrete surface within the site. What equipment will be used? Are there alternatives that would minimise the noise? We also understand that there may be fuel sumps on site from the site's use as a Tank training barracks and service facility. The DMP should outline how any such facilities will be dealt with if found.

30 This should specify the maximum noise levels anticipated.

33 As with noise, the contractor should be responsible for monitoring dust generated on the site, regardless of whether Camden is monitoring. More detail is required on how dust on site will be managed and monitored: number, location and specification of monitors; maximum acceptable levels; whether monitoring is real time; if not, how frequently the output from monitors will be checked; by whom; by whom and when breaches of the maximum acceptable level will be identified; how and by whom activities on site will be suspended; how the incident will be investigated. Activity on site should be suspended until the incident has been investigated and appropriate remedial measures put in place. The contractor should also be aware that Chester Balmore Estate residents

are required to keep windows open during the summer to try to hold temperatures below 25C due to overheating issues which affect the units facing Chester Rd. Residents are therefore especially concerned about noise, dust and pollution, particularly if a partial lockdown remains in place.

35 See paragraphs 28 and 33 above.

38 See 33 above.