

Our ref: Q230546
Your ref: PP-12637151
Email: poppy.cornish@quod.com
Date: 24 January 2024



London Borough of Camden
2nd Floor, 5 Pancras Square
Town Hall, Judd Street
London
WC1H 9JE

Dear Christopher,

WEST KENTISH TOWN ESTATE | PRIOR APPROVAL FOR DEMOLITION

We are instructed by our client London Borough of Camden, to apply under Class B, Part 11, Schedule 2 of the Town and Country Planning (General Permitted Development (England) Order 2015 (as amended) ("GDPO") for Prior Approval for the demolition of three existing groups of garages at the above site.

SITE CONTEXT

The three groups of single storey garages proposed to be demolished are all located within the West Kentish Estate, Camden. There are 54 garages in total, and none are currently in use. The three groups of garages have a total GIA of 632sqm.

The majority of the garages to be demolished are located at the junction of Allcroft Road and Coity Road. Another group of garages are located along Athlone Street, abutting a railway viaduct. The third group of garages are located off Queens Crescent. None of the garages are located within a Conservation Area or are listed.

SUBMISSION DOCUMENTS

This application has been submitted via the planning portal (ref. PP-12637151) and includes the following documents:

- Completed and Signed Application Form, prepared by Quod;
- Site Location Plans, prepared by Allford Hall Monaghan Morris;
- Demolition Method Statement which provides a written description of the proposed development, prepared by Goody Demolition Ltd. This is supported by:
 - Risk Assessment;
 - Demolition Plan showing location of hoarding and vehicle tracking;
 - Tree survey and Tree constraints plan;

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- Bat survey;
 - Asbestos survey;
 - A Geo-Environmental Interpretive report; and
 - UXO information.
- This supporting planning letter.
 - A copy of the site notice which will be displayed at the site of each group of garages proposed to be demolished for no less than 21 days in the period of 28 days beginning with the date on which the application is submitted to the local planning authority (in accordance with paragraph Part B2 (b)(iv) of the GDPO). A photograph of the site notice (signed and dated) will be sent to London Borough of Camden following the submission of this prior approval application.

An online payment of £184 (£120 Planning Fee + £64 (inc. VAT)) has been made to cover the cost of the application.

PROPOSED DEMOLITION AND METHODOLGY

The Demolition Method Statement outlines the process for the strip out and demolition works and includes safety and security measures that will ensure that any environmental impacts are properly addressed and mitigated. Qualified personnel will be employed to undertake the demolition process and comply with the principles of the Method Statement. All work will be undertaken within the Council's construction hours, which are Monday to Friday from 08:00am to 17:00pm. No works are proposed on Saturdays, Sundays or public holidays unless agreed by LB Camden and the Local Authority prior to commencing.

All garages will be cleared out prior to the demolition works commencing. The three garage locations will be prepared to allow for the plant operator to bring the excavator in to begin the removal of the garage roofs and walls. Some of the garages on Athlone Street and Coity Road will be demolished partly by hand to ensure no damage occurs to surrounding residential buildings and other structures.

Where identified, all COSHH (Control of Substances Hazardous to Health) and Asbestos Containing Materials (ACMs) will be removed in accordance with the latest relevant legislation. All ACMs identified within the refurbishment and demolition survey and contained within the structures to be demolished shall be removed from site by a specialist licensed contractor and as such these ACM removal works shall comply with current best practice and The Control of Asbestos Regulations 2012. Should further ACMs be found, all demolition works shall cease, the client will be notified, and the specialist licensed contractor will be recalled to the site to remove and dispose of the materials.

Once the demolition works have been completed, the areas where the garages previously stood will be cleared and made ready for the removal of the slab and foundations. The last step will be to dig up the ground to the depth as specified by the Camden Council Project Management Team.



The Demolition Method Statement submitted as part of this application includes safety and security measures that will ensure that any environmental impacts are properly addressed and mitigated. Emergency Plans will be put in place by the Project Management Team, if there are any unplanned collapses whilst the demolition works are taking place.

The Demolition Method Statement includes information regarding traffic management, including the location of site entrances. We are aware that improvement works will be taking place at Queens Crescent at a similar time to the demolition of the West Kentish Estate Garages. We are in contact with those undertaking the Queens Crescent works to co-ordinate as necessary and as the two schemes have different access points, we are not envisaging any issues will arise.

PRE-APPLICATION DISCUSSIONS

Pre-application correspondence was received from Christopher Smith, from London Borough of Camden on the 24th October 2024. Through this correspondence the scope of the application and the application documents to be submitted were confirmed.

ACCEPTABILITY

This application seeks prior approval from London Borough of Camden that demolition can take place as outlined within legislation. In the case of this Prior Approval application, the development plan policies and policies set out in the National Planning Policy Framework (2023) do not apply.

We confirm that the proposed demolition falls within Class B, Part 11, Schedule 2 of the GDPO, which permits any building operation consisting of the demolition of a building. Paragraph B1 of Schedule 2, Part 11, Class B of the GDPO sets out the criteria for which development is not permitted under Class B. This includes if:

- (a) the building has been rendered unsafe or otherwise uninhabitable by the action or inaction of any person having an interest in the land on which the building stands and it is practicable to secure safety or health by works of repair or works for affording temporary support;
- (b) the demolition is “relevant demolition” for the purposes of section 196D of the Act (demolition of an unlisted etc building in a conservation area)
- (c) the building is used, or was last used, for a purpose falling within—
 - (i) article 3(6)(p) (drinking establishments etc.) of the Use Classes Order; or
 - (ii) article 3(6)(q) (drinking establishments with expanded food provision) of that Order;
- (d) the building is used, or was last used, for the purpose of—
 - (iii) a concert hall;
 - (iv) a venue for live music performance; or



- (v) a theatre
- (e) the demolition relates to a statue, memorial or monument (“a commemorative structure”) in place for a period of at least 10 years on the date of any proposed demolition, other than a commemorative structure:
 - (vi) that is a listed building;
 - (vii) that is a scheduled monument;
 - (viii) within a cemetery, on consecrated land, or within the curtilage of a place of public worship;
 - (ix) within the grounds of a museum or art gallery; and
 - (x) within the curtilage of a dwellinghouse

The garages have not been rendered unsafe and demolition of the garages are not classed as relevant demolition i.e. the garages are not listed and are not within a conservation area. Further to this, the garages are not used for the purposes set out above in points c) and d). The garages are not classed as a statue, memorial, or monument.

The development is therefore able to benefit from Class B permitted development – demolition of buildings.

The demolition method statement successfully demonstrates that there is no conflict between the proposed demolition and the provision of Class B, Part 11, Schedule 2 of the GDPO and is aligned with the pre-application advice received from LB Camden.

We therefore request that LB Camden either confirm that Prior Approval is not required before the demolition can proceed, or alternatively grant Prior Approval to allow the demolition to proceed.

We trust the enclosed is sufficient for you to validate and determine the prior approval application and we look forward to receiving confirmation of this in due course. If for any reason this is not the case, please do not hesitate to contact us.

Yours sincerely

Poppy Cornish

Associate Director

cc. Omar Villalba