
From: Janine Sachs [REDACTED]
Sent: 01 February 2018 19:52
To: McClue, Jonathan; Planning
Cc: Freeman, Roger (Councillor); Spinella, Gio; Nayra Bello O'Shanahan; edie raff
Subject: Re: Missing objections and CMP procedure

Follow Up Flag: Follow up
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On 24 Jan 2018, at 13:15, sachs janine [REDACTED] wrote:

CLEUD – 100 Avenue Road Application Ref: 2017/6884/P

24.01.18

Dear Camden Planning

I am writing to object to developers' Essential Living having recently carried out unauthorised partial demolition on the 100 Avenue Road building by removing the steps and disabled ramp from the southern entrance of the building without permission from Camden, and their application for a certificate for retrospective approval that will implement full planning permission.

There can be no justification for Camden to grant this application because the Construction Management Plan has not yet been approved by Camden. The Construction Management Plan is a legal obligation, applied by the Secretary of State, which clearly states: **“Not to Implement or permit Implementation of the Development until such time as the Council has approved the Construction Management Plan as demonstrated by written notice to that effect.”** [3.5.2].

The 'Service Management Plan', the 'External Public Open Space Plan' and the 'Travel Plan' are also legal obligations yet to be satisfied prior to commencement.

Richard Evans' [WYG] argument in his cover letter to Camden that “Other pre-commencement conditions requirements do not apply to the nature of works, and accordingly are not required to be supplied at this time..” does not follow since access issues are integral to demolition and construction of development and therefore cannot be excluded from the nature of works.

Otherwise what is the point of having pre-commencement conditions and a time limit within which to satisfy them if all developers have to do is demolish external steps to exempt themselves from their legal obligations and by-pass their time limit?

It is also important to note that this demolition has a particularly detrimental effect on the community because it removes the only dedicated wheelchair ramp access for the southern section of the building (separated from the northern section). There are very strong grounds to object to this in the absence of a construction management plan that provides equal access for disabled people and workers taking part in any demolition:

Equality Act 2010:

"If a physical feature within the workplace creates a disadvantage for a disabled employee, steps must be taken to amend or remove the obstruction. Physical adjustments can include changes such as: The addition of a ramp rather than steps to access buildings."

This is relevant in the case of this development because, according to this Construction Management Plan, 'Controlled Demolition' must first be carried out, including asbestos removal and 'Soft Strip' from inside the building [[Appendix-M](#)]. Because the building is divided in the middle it is therefore essential that there is **safe access for all construction workers** from both entrances before 'Structural Demolition' commences. And, according to their "General Procedures for Site Set UP, the developers say: **"Our absolute priority is the promotion of health and safety during any demolition works. This tender demolition methodology sets out the general requirements, sequence of works and safety arrangements that will be in place throughout the demolition."**

Essential Living have given no explanation as to why they could not apply for planning permission in the proper way. It is important that no one, including wealthy developers, are above the law.

For these reasons, I strongly object to this application."

Janine Sachs



BE REALISTIC-PLAN FOR A MIRACLE