

Dear Mr Tulloch

I am sending this email on behalf of my husband, Hafi Rahman, and myself. We currently reside at 13 Berridge Mews, West Hampstead, London NW6 1RF but are in the process of purchasing 4 Pilgrim's Lane NW3 1SL and will be moving to that address next month.

Planning application no: 2012/5825/P for basement excavation works at 8 Pilgrim's Lane has recently been brought to our attention. We strongly object to the application, for the reasons set out below. We should be grateful if Camden Council would take account of this email in taking any decision relating to the application.

Our objections in respect of the decision include the following:

1. The application, if granted, would not be compliant with DP27. We note in particular that DP27 expressly states that the Council 'will only permit basement and other underground development that does not cause harm to the built and natural environment and local amenity and does not result in flooding or ground instability'. We are of the view that the application, if granted, would cause substantial harm to the built environment in the locality and would result in ground instability. This view is reinforced by the expert reports of Michael Eldred and Dr Michael de Freitas dated 16 August 2013 and 15 August 2013, which we have seen.
2. We are concerned that the proposed works will destabilise neighbouring properties (including our own). We are also concerned that the proposed works will also cause great inconvenience to local residents, with the road effectively being blocked during the proposed excavation and construction works, bearing in particular mind the nature of Pilgrim's Lane as a narrow one-way street outside the property in question.
3. As explained above, we have seen the expert reports of Michael Eldred and Dr Michael de Freitas. I am a lawyer who specialises in public law/judicial review, and am of the view that it is essential as a matter of law that the expert reports of Mr Eldred and Dr de Freitas dated 16 August 2013 and 15 August 2013 are fully reviewed by the independent assessor before any decision is taken by the planning committee in respect of the application. The expert reports are clearly very relevant to the determination of the application, and given their technical nature it is essential that the assessor is given a proper opportunity to comment on them before the committee can take a decision.

Yours sincerely

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**Application Number: 2012/5825/P - 8 Pilgrim's Lane NW315L**

Dear Mr Tulloch,

We would like to strongly oppose this application in its current form and strongly support the Independent reports commissioned by Pilgrim residents as set out in the points below.

- These expert reports have consistently outlined significant deficiencies in the proposed application. They note that the application does not ensure the stability of the neighbouring houses and does not conform to DP 27. This is very worrying in light of the sensitive "flying freehold" column structure in the adjacent property at #10.
- We are concerned that Camden has not fully taken account the recommendations of these expert reports despite commissioning an independent review of the application. Furthermore, Camden has neglected to look at our experts' reports in a timely manner and asked the experts to examine them in a cursory manner for as long as long as 8 months after we submitted them.
- The Planning Officer wants to leave crucial engineering details left to be dealt during the actual construction stage whereas our expert consultants rightly say that they must be explained and provided at the time of the application. Our experts point that failing to do so could lead to serious potential damages to the neighbouring properties.
- We are strongly opposed to the felling of a healthy Japanese Cherry tree which provides substantial amenity to the community and is subject to a TPO.
- The proposed basement excavation layout is substantially the same as the previous application for this property. This application was rejected in 2010 on the grounds of over-development; Camden noted at the time that "the basement elevation should protrude no further than the original building line". The current proposal would extend over 4 metres from the original building line and, with a final depth of 4.9 metres, would require a deeper excavation than the rejected application.
- 8 Pilgrim's Lane is located in a narrow one-way street and this proposed development would create traffic mayhem. The impact of the layout of the jersey curb would restrict refuse, ambulance and delivery services.
- No Sustainable Drainage System (SUDS) plans have been provided despite evidence of water overflow in this location.

Dear Mr Tulloch

I have written to Camden on previous occasions relating to proposals to redevelop 8 Pilgrim's Lane, a house across the road from my own. This message is to reinforce my earlier concerns that the latest application does not satisfy Camden's own policies, leaves neighbouring properties at risk and its scope is excessive leading to significant traffic and parking disruption and environmental concerns during construction and perhaps to damage and injury.

Specific concerns include

- The current application does not take into account the findings of various experts' opinions and reports which must surely be satisfied if the development were to proceed. These reports conclude, in general terms, that there is significant risk of structural damage to the neighbouring houses.
- The risks of the construction of a large and deep basement diverting the significant water flows below ground may have substantial effects on neighbouring houses including my own.
- The proposed basement excavation is little changed from that in the previous application and would extend over 4 metres from the original building line. Further, the depth of 4.9 metres is even deeper than that proposed in the previous application.
- 8 Pilgrim's Lane is located in a narrow one-way street; the proposed development would create significant traffic problems, reduce parking opportunities for nearby residents and their visitors in an already congested parking area and result in many HGV movements with their resulting impact on the environment.
- The healthy Japanese Cherry tree which would need to be felled is rightly is subject to a TPO.

I trust that you will give serious consideration to these concerns and reject the application.

Frank Harding  
11 Pilgrim's Lane  
NW3 1SJ

Dear Sir,

As residents of the affected area, we are writing to endorse the objections lodged by Mr Froment and Mr Owens. We have considered, and entirely agree with, the points which they have made in objecting to this application, which we set out below for ease of reference:

- Expert reports have consistently outlined significant deficiencies in the proposed application. They note that the application does not ensure the stability of the neighbouring houses and does not conform to DP 27. This is very worrying in light of the sensitive "flying freehold" column structure in the adjacent property at #10.

- We are concerned because we understand that Camden has not fully taken account of the recommendations of these expert reports despite commissioning an independent review of the application. Furthermore, we understand that Camden neglected to look at the experts' reports in a timely manner, and asked the experts to examine them in a cursory manner as much as 8 months after Mr Froment and Mr Owens submitted them.

- We understand that the Planning Officer wants to leave crucial engineering details to be dealt during the actual construction stage whereas the expert consultants say that they must be explained and provided at the time of the application. The experts point that failing to do so could lead to serious potential damage to the neighbouring properties.

- We are strongly opposed to the felling of a healthy Japanese Cherry tree which provides substantial amenity to the community and is subject to a TPO.

- The proposed basement excavation layout is substantially the same as the previous application for this property. This application was rejected in 2010 on the grounds of over-development; Camden noted at the time that "the basement elevation should protrude no further than the original building line". The current proposal would extend over 4 metres from the original building line and, with a final depth of 4.9 metres, would require a deeper excavation than the rejected application.

- 8 Pilgrim's Lane is located in a narrow one-way street and this proposed development would create traffic mayhem. The impact of the layout of the jersey curb would restrict refuse, ambulance and delivery services.

- No Sustainable Drainage System (SUDS) plans have been provided despite evidence of water overflow in this location.

- We are also concerned about the potential risk to safety from the restriction of access to gas utility points.

Yours faithfully,

E. O. Bourne and M. Leavitt Bourne  
Hampstead Hill Mansions, Downshire Hill, NW3 1NY

Dear Rob Tulloch

I understand that the resubmitted Planning Application 2012/5825/P to build a basement for No 8 Pilgrims Lane, NW3 1SL, has still not been refused and that you are currently writing your recommendations.

I have said twice before to you that, as a frequent visitor to that narrow, one-way part of Pilgrims Lane, I think it entirely unreasonable to subject the residents there to a year or more of noise, dust and traffic chaos during the construction of what is essentially luxury space, hidden underground because it is inappropriate for a historic Arts and Crafts house.

I understand that the latest application still proposes that the basement should protrude beyond the original building line. Further, expert reports note that the application does not conform to Camden DP 27. It does not make adequate provision for the structural safety of the neighbouring houses or for a sustainable drainage system. The relevant ground investigations were made in a very dry period when two dry winters in a row led to unusually low groundwater levels. I am also particularly concerned to hear it proposed that, if planning permission were to be given, crucial engineering details of the work would be left to be decided after that event.

I trust that your recommendations will reflect the inadequacies of the application and the serious dangers involved in the proposed work. Further, I sincerely hope that the Camden Authority will act in the best interests of the people who live in Pilgrims Lane, rather than of those who do not live there, but can afford to persist with this dubious application.

Regards, Colin Barnfather.

Dear Mr Tulloch,

I am writing in regards to the proposed basement development at 8 Pilgrims Lane.

My family and I live at 7 and 7a Pilgrims Lane, virtually opposite the proposed development.

\* We are still very concerned about the potential for ground movement and its effect on our Grade 2 listed house, as well as our neighbours' properties.

\* We remain very concerned that the reports Camden have commissioned are not conclusive and cannot rule out damage to neighbouring properties. The reports also conflict with independent reports that have been carried out by our neighbours, and fail to answer key questions regarding engineering details and potential ground movement.

\* We are also concerned at how the proposed work would affect our ability to use our driveway and garage. Pilgrims Lane is a narrow, one way street, and a busy through-road -- yet another reason why this proposal is unrealistic.

\* It appears that there has been little substantial change since the original application.

Therefore we believe it would be a huge error to carry out the proposed basement excavation, firstly because, by the report's own admission, the effects on our listed house cannot be quantified; and secondly because of the disruption to Pilgrims Lane and the potential obstruction of access to our house.

Kindly confirm receipt of this message by return email. I am also copying my lawyer for reference.

Thanks,

C. Green

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