Dear Rob Tulloch

I understand that the resubmitted Planning Application 2012/5825/P to build a basement for No 8 Pilgrims Lane, NW3 ISL, 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.

Subject: Planning application no: 2012/5825/P - 8 Pilgrim's Lane NW3 1SL

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 Pligrim'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:

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 words 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

Nusrat Zar

Herbert Smith Freehills LLP and its subsidiaries and Herbert Smith Freehills, an Australian Partnership, are separate member firms of the international legal practice known as Herbert Smith Freehills.

This message is confidential and may be covered by legal professional privilege. If you are not the intended recipient you must not disclose or use the information contained in IL I you have received this email in error please notify us immediately by return email or by calling our main switchboard on +44 20 7374 4000 and delete the email.

Further information is available

Herbert Smith Freehills LLP is a Limited Liability Partnership registered in England and Wales with registered number OC310989. It is authorised and regulated by the Solicions' Regulation Authority of England and Wales whose rules can be accessed via www.sra.org.uk/ucod-oc-anduct.page. A file of the members and their professional qualifications is open to inspection at the registered difficus exchange House, Primose Street, London EC2A ZEG, We use the word partner of Herbert Smith Freehilis LLP to refer to a member of Herbert Smith Freehilis LLP, or an employee or consultant with equivalent standing and qualifications. Refers Smith Freehilis LLP to refer to a member of Herbert Smith Herbeit Smith is GB 927 1996 83.