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**From:** Gerald Paterson [REDACTED]  
**Sent:** 15 December 2017 14:13  
**To:** Constantinescu, Nora-Andreea  
**Subject:** Objection to Planning Application 2017/5912/P

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Constantinescu,

Please find below our objections to Camden Planning Application 2017/5913/P.

Thank you for your efforts in meeting my neighbour and me, and for extending the deadline for objections to this Planning Application to 15 December 2017.

We have noticed that the schedule for the hearing of this application has been removed from the Camden Council website. Is there a new schedule, and could we please have a copy.

Could you please confirm receipt of this objection by email.

Also, could you please inform us when this objection is posted on the Camden Council website, the date of the hearing of the Planning Committee for this application and the date to apply to be heard at this meeting. I wish to attend this meeting and to speak.

With kind regards,

Yours sincerely

Gerald Paterson

The text of our objection begins below.

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**Objection to Planning Application 2017/5913/P**

I, Gerald Paterson, have been the freeholder of [5 Keats Grove, London NW3 2RT](#) since 1976. My wife and I have lived here for the last 20 years as our principle and only residence, and we hope to continue to live here peacefully and without disturbance for the foreseeable future. The driveway of our house is immediately adjacent to the east wall of the Studio and the proposed building works. A self contained Side House which is part of our property lies at the bottom of the driveway and has been occupied by a tenant for the past seven years.

Our neighbour, Mr. Marcus Piggott, has owned [4 Keats Grove, London NW3 2RT](#) including the Studio since 2014. The house has been unoccupied since then. We understand that he lives and works in Ibiza, Spain

After careful and detailed consideration of all documents of this planning application as of noon on 15 December 2017, we strongly object to the planning application 2017/5913/P for the following four reasons:

**1. The proposed building works extend beyond the boundary line between [4 Keats Grove](#) and [5 Keats Grove](#)**

As the planning application makes clear, the proposed underpinning of the east wall of the Studio will extend under the driveway of [5 Keats Grove](#). This extension would prevent future repair or improvement of our property along this boundary wall. The Land Registry instructs that all works along any boundary should be agreed by both parties on either side before any works are undertaken. Such an agreement has not been either asked for or agreed. I would never consent to such works carried out on our property.

**2. Previous subsidence at 5 Keats Grove and near by properties**

Our house suffered serious subsidence approximately 10 years ago. We had to evacuate our house. The centre of that subsidence was located immediately adjacent to the Studio causing large cracking throughout our house. We wish to prevent a future repeat of these events that would lead to serious financial loss and enormous disturbance of our lives. Other houses nearby have been subject to major subsidence - Nos. 1 and 14 Keats Grove and No. 38 Heath Hurst Road. The potential risk of such further subsidence has not been investigated - it is just stated to be "unknown".

### **3. The Planning Application 2017/5913/P is incomplete.**

The application, as of noon on the 15 December 2017, seems to be missing the following:

A projected drainage report of the final completed works and its effect on the water table and drainage flow.

A geological report of the constitution and condition of the subsoil exactly at the site of the Studio along with calculations of increased load bearing

An impact study on the utilities and services for the neighbourhood especially main water lines

An environmental impact study of effects to trees, surface drainage and noise pollution including from the hydrotherapy pool and its pump

A Construction Management Plan including a time schedule of the full project to completion

The Basement Impact Assessment is not stated to have been prepared by properly qualified professionals including a hydrologist and geologist

There is a restrictive covenant on the Studio preventing alterations to the window and door on the south wall of the Studio, without my consent, which is in my absolute discretion.

A security plan for protection of all properties during construction

A schedule of compensations and damage liability during construction

### **4. Liability of future events post completion**

Since the subsoil is composed mostly of London Clay, future movement of the Studio, the driveway, and other structures can not be completely predicted. A plan for future claims and compensation should be determined and detailed in full before the start of any construction. From the present application, this is not clear.

In summary, **this planning application should be refused on the first point alone**, since some of the property that they proposed building upon is not theirs. This application is for a vanity project and will reduce housing in Camden. The application should also be refused under points 2, 3 and 4 in the absence of my consideration of further documentation

If further documents, plans and schedules (as outlined in point 2, 3 and 4) are provided and an amended planning application is produced and circulated to all interested parties, then another review of our opposition will be undertaken.

**At the present moment with all documents available at noon on 15 December 2017, we suggest that the Planning Committee consider postponing a decision until a full complete application is made available. We further suggest that a time limit of 3 months to improve and to complete this application should be applied, with a refusal being the outcome if these works are not completed. We believe that this will limit the time, efforts, resources and anxiety that all the parties and the Council will spend on this proposal.**

Any supporting documents to this objection can be obtained with notice.

Yours sincerely,

Gerald Paterson  
5 Keats Grove,  
London NW3 2RT