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**From:** Gerald Paterson [REDACTED]  
**Sent:** 17 July 2018 10:11  
**To:** Constantinescu, Nora-Andreea  
**Subject:** Further objections to Planning Application 2017/5913/P - 4 Keats Grove NW32RT

Dear Ms Constantinescu,

We live at 5 Keats Grove, NW3 2RT, immediately adjacent to The Studio, the site of the proposed works. In response to the Planning Application, I sent previous objections to you by e-mail dated 15 December 2017.

I have reviewed the further documents which have been filed on behalf of the applicant Mr Marcus Piggott and which are on the Camden website dated 18/06/2018. I set out below our further objections to this Planning Application in response to these further documents.

With kind regards,

Yours sincerely,

Gerald Paterson.

#### FURTHER OBJECTIONS TO PLANNING APPLICATION 2017/5913/P

#### SUMMARY OF OBJECTIONS.

1. PROPOSED WORKS ON MY LAND
2. NO CONSULTATION WITH ANY NEIGHBOURS
3. PROPOSED WORKS THREATEN THE HERITAGE OF KEATS GROVE
  - A. DANGEROUS HIGHWAY NETWORK PLANS
  - B. UNDESIRABLE CHANGE OF USE

#### 1. PROPOSED WORKS IN MY LAND

Technical Note - Ground Movement Assessment - Appendix A.

Drawing 51659/01 E shows underpinning partially in my land, beyond the boundary of 4 Keats Grove. I would never consent to this.

#### 2. NO CONSULTATION WITH NEIGHBOURS

Construction Management Plan - Section 12 - Community Liaison

Pro forma v2.2

Section 13 - Consultation.

Section 12 pro forma sets out in detail the Council's requirements...

eg. "A neighbourhood consultation process must have been undertaken prior to submission of the CMP first draft".

"The Council expects meaningful consultation"...

#### THERE HAS BEEN NO CONSULTATION WITH NEIGHBOURS.

The pro forma requests "details of consultation of draft CMP with local residents etc". In reply the Applicant states as follows:

"This is a small site so all pre contract consultation has been Arranged via the party wall surveyors who have also shared info on programme and method statements for temporary works, this CMP has also been shared via this avenue".

EVERYTHING SO STATED IS TOTALLY UNTRUE.

A. There has been no consultation arranged via the party wall surveyors.

B. The Surveyors have shared no information "on programme and method statements for temporary works".

Example - pages 26 and 27 of CMP state "2.4m hoarding will be built around site". That would include on my drive and would need my written consent.

C. THE CMP has not been shared via this avenue, and has not been seen by me until it appeared on the Camden website

D. The Applicant's party wall surveyor Bradley Mackenzie has provided no information concerning the proposed works identified in the Party Wall Notices at all.

The two Party Wall Notices were served on me on Saturday 23rd December without any prior notice or discussion, at a time which was clearly intended to cause maximum inconvenience to me. During the six months since then. Bradley Mackenzie has refused to provide my Surveyor Peter Sharp with any information concerning the proposed works. On 18th June 2018 Peter Sharp served an Award on the Applicant Marcus Piggott which summarises the unsuccessful efforts which he has made to obtain relevant information from Bradley Mackenzie (copy attached).

Such a false submission from the Applicant Marcus Piggott on a simple matter of procedural fact is disturbing. All such submissions should surely be made with honesty and in good faith. How far can the Applicant's other submissions be trusted ?

### 3. THE PROPOSED WORKS THREATEN THE HERITAGE OF KEATS GROVE

#### A. DANGEROUS HIGHWAY NETWORK PLANS

The "Site location and Highway network plans" show a marked up street view photograph dated June 2015, with a construction traffic plan. This plan appears to seriously threaten both pedestrian and road traffic. Earlier local residential objections set out serious concerns on this matter, and the Keats Community Library set out detailed comments.

Keats Grove is a beautiful narrow intimate street with historic associations which attracts many tourists, and is a Conservation Area. Keats House and the Community Library are located here, which attract many visitors and schoolchildren and small children in buggies and prams.

I have read the objections dated 16 July 2018 of Roberta Sacks at 24 Keats Grove (directly opposite the proposed works) and I fully agree with them.

The Hampstead Neighbourhood Plan 2018 should be carefully considered in this connection.

THE APPLICANT'S PLAN IS DANGEROUS TO PEDESTRIANS AND ROAD TRAFFIC.

#### B. UNDESIRABLE CHANGE OF USE

The Studio is a unique example of a late Victorian artist's studio. It remained in its original state until 2003, when it was an uninhabitable very dilapidated shell. The interior was then developed into an attractive habitation for two people. The proposed works will destroy this habitation and replace it by a hydrotherapy pool and plant room - an undesirable change of use project which adds nothing to the Keats Grove heritage. Furthermore the proposed works clearly threaten the integrity of the Studio building structure.

The Applicant Marcus Piggott has owned 4 Keats Grove since 2014 but has not lived in it. The house has been unoccupied since then. It is clear that the Applicant has no knowledge of the historical heritage of Keats Grove. This planning application shows complete insensitivity to such heritage. The above traffic plan is an example of this.

For the above additional reasons I ask that this Planning Application be refused.  
Yours sincerely,  
Gerald Paterson.