

**RESPONSES RECEIVED TO CMP CONSULTATION FOR PLANNING APPROVAL  
2015/6231/P "GARAGES ADJACENT 25B & 25E FROGNAL & REAR OF MERIDIAN  
HOUSE (FINCHLEY ROAD) LONDON NW3 6BJ**

From: **Ken Howard** <[kchoward1@mac.com](mailto:kchoward1@mac.com)>  
Date: Sun, 9 Feb 2020, 15:36  
Subject: Fwd: CMP development of two garages lane 25a and 25c Frognal  
To: Natassja Norval <[tassj@kias.services](mailto:tassj@kias.services)>

Dear Ms Norval,

I write further to my email to you of 1st February 2020 from the USA, when I notified you that I had been informed (although not by you) of the issuing of the above CMP. You then, at my urgent request, emailed me a copy of the CMP.

Although the CMP asserts compliance with a legal obligation, stating that "[A letter notifying the occupiers about the potential development by either post or email ... a copy of the CMP was sent to all the listed properties below](#)" and that list includes "Nos. 27b -47 (odd) Arkwright Road" I have not received the letter in question. I have spoken to several other neighbours whose addresses are listed and who have also not received the obligatory letter.

I have now studied the CMP and wish immediately to object to the CMP on the basis that is both defective and not realistically feasible. I say this because:

- (1) There is no resolution of the serious issues relating to the Rights of Way at the site. The proposed works, a fortiori works on both the garage and the Arkwright Road sites simultaneously, exclude any uninterrupted, unimpeded exercise of those rights of way.
- (2) There is no detailed plan addressing precise siting and movement, nor any measured pressure impact statement dealing with the sizes and weight of construction vehicles.
- (3) The CMP for the garages very seriously conflicts with the Draft CMP (November 2018) for construction of two houses in the rear gardens of 29/33 Arkwright Road. The garages CMP states that work will commence on the garage site first. The Arkwright CMP states the opposite. This conflict must be resolved immediately and every neighbour must be informed without delay.
- (4) It would self-evidently be untenable for both Construction Projects to proceed simultaneously. There is simply insufficient access and insufficient space for manoeuvre. Access to the garages is to be via the Lane, not via Arkwright Road, as is also the bulk of the access for the two houses in the Arkwright Road gardens. This problem has not been addressed by the CMP except by the confusing and nonsensical statement that "[Works are currently ongoing at this site and are likely to be substantially complete by the time Arkwright Road commences. However, should the two sites be constructing at the same time, there may be some overlap of construction vehicles accessing the two sites from Arkwright Road. This risk is considered to be low as the vehicles would be controlled by normal road conditions.](#)"
- (5) the CMP for the garages states the ownership of the project sites is "related", but the CMP for 29/33 Arkwright Road states that the ownership is "the same". Which of these statements is correct? The true position should be documented forthwith.
- (6) The principal contractors named in the CMP, Amirilan Management Ltd, have no audited accounts and virtually no assets. They would therefore not be able to compensate for any damage occurring during construction. We require to see an insurance policy covering liability for any loss and damage to neighbours during construction.

I await your response as a matter of urgency,

Yours sincerely,

Ken Howard (Secretary)

27 Arkwright Road RTM Co Ltd

From: <[frogark@icloud.com](mailto:frogark@icloud.com)>  
Date: Mon, 10 Feb 2020, 14:17  
Subject: CMP for development of 2 garages in the lane between 25a/25c Frogнал  
To: Natassja Norval <[tassj@kias.services](mailto:tassj@kias.services)>

Dear Ms Norval,

We write regarding the above CMP for Development of two garages in the lane between 25a and 25c Frogнал and note that although the CMP asserts compliance with a legal obligation, stating that "A letter notifying the occupiers about the potential development by either post or email ... was sent to all the listed properties below" we have spoken to several neighbours whose addresses are listed and they have not received the obligatory letter.

Obviously each of those neighbours are entitled to a 14 day response period. Please confirm this by return.

Your letter is headed 'Details of Construction Traffic Management for the forthcoming development of the 2 garages down the lane between 25a and 25c Frogнал'. The document enclosed refers to 'Garages Adjacent 25B & 25E Frogнал & Rear of Meridian House (Finchley Road) London NW3 6AR) leading people to believe that these are two different matters. The letter needs to be re-sent to clarify this discrepancy.

We have studied the CMP and wish immediately to object to the CMP on the basis that it is both defective and not realistically feasible. We say this because:

(1) There is no resolution of the serious issues relating to the Rights of Way at the site. The proposed works, which are works on both the garage and the Arkwright Road sites simultaneously, prevent uninterrupted, unimpeded exercise of those rights of way, since lorry parking is proposed on the rights of way, thus impeding movement of vehicles over the rights of way.

(2) There is no detailed plan addressing precise siting and movement, nor any measured pressure impact statement dealing with the sizes and weight of construction vehicles.

(3) The CMP for the garages seriously conflicts with the Draft CMP (November 2018) for construction of two houses in the rear gardens of 29/33 Arkwright Road. The garages CMP states that work will commence on the garage site first. The Arkwright CMP states the opposite. This conflict must be resolved and every neighbour must be informed without delay.

(4) It is self-evidently untenable for both Construction Projects to proceed simultaneously. There is simply insufficient access and insufficient space for manoeuvre. Access to the garages is to be via the Lane, not via Arkwright Road, as is also the bulk of the access for the two houses in the Arkwright Road gardens.

This problem has not been addressed by the CMP except by the confusing and nonsensical statement that "Works are currently ongoing at this site and are likely to be substantially complete by the time Arkwright Road commences. However, should the two sites be constructing at the same time, there may be some overlap of construction vehicles accessing the two sites from Arkwright Road. This risk is considered to be low as the vehicles would be controlled by normal road conditions."

(5) In view of the above, it is obviously absolutely crucial that the two CMPs for, respectively, the garages and the Arkwright Road site are considered together.

(6) The CMP for the garages states the ownership of the project sites is "related", but the CMP for 29/33 Arkwright Road states that the ownership is "the same". Which of these statements is correct? The true position should be documented forthwith.

(7) The principal contractors named in the CMP, Amirilan Management Ltd, have no audited accounts and virtually no assets. They would therefore not be able to compensate for damage occurring during construction. We require to see an insurance policy covering liability for any loss and damage to neighbours during construction.

We await your response as a matter of urgency

Yours sincerely,

Mr and Mrs Philip Mercer, Ms. Barbara Dohmann QC, Mr Stoddard Martin, Mr and Mrs Bill Frankel, Ms Cherie Yeo, Mr and Mrs Yiyong Yang, Mr Ken Howard, Mr Ben Shorten, Mrs Lesley David.

From: **Neil Bruce** <[Neil.Bruce@fullersbrewery.co.uk](mailto:Neil.Bruce@fullersbrewery.co.uk)>  
Date: Mon, 10 Feb 2020, 18:48  
Subject: RE: Frogna1 NW3 6AR works (25a and 25c)  
To: Anna Thomson <[contact@adlplanning.co.uk](mailto:contact@adlplanning.co.uk)>  
Cc: [frogark@icould.com](mailto:frogark@icould.com) <[frogark@icould.com](mailto:frogark@icould.com)>, [lisa@lisalinder.com](mailto:lisa@lisalinder.com) <[lisa@lisalinder.com](mailto:lisa@lisalinder.com)>, [tassj@kias.services](mailto:tassj@kias.services) <[tassj@kias.services](mailto:tassj@kias.services)>, [tulip.siddiq.mp@parliament.uk](mailto:tulip.siddiq.mp@parliament.uk) <[tulip.siddiq.mp@parliament.uk](mailto:tulip.siddiq.mp@parliament.uk)>

Hi Anna,

I understand, via a letter popped through our door today from Frogna1 neighbours, that planning permission has (somehow) been granted for the building of these two luxury houses. Virtually on our doorstep.

As per my previous note (Dec 2018 below), this directly affects us at No 25 Frogna1, but we have not received any formal letter from either Camden or the contractor (copied).

1. Isn't there a legal obligation to formally notify us of this sort of thing? And that will significantly impact our day to day lives.
2. Is it also correct that tomorrow is the deadline to formally object?
3. How have we been missed out of the loop like this?

I thought Camden Council had (a) legal obligations in this regard and (b) is meant to represent local residents, rather than necessarily contractors/purely commercial interests – as appears to be the case here.

In case it is not already, clear my wife and I object to this new build x 2 most strongly.

We can't believe it has even come this far.

The resultant traffic chaos, over at least 2 years, will bring this busy part of NW3 London to a grinding halt every morning and afternoon.

Quite apart from whether due process has been followed here.

And quite apart from whether this part of London needs two more luxury homes!

I shudder to think of the disruption this will cause.

Dear Ms Siddiq,

I hope you don't mind us copying you in on this. I suspect you have already been made aware of this. It will cause chaos! For two years or more. Are you able to please help?

Regards

Neil (and Lisa)

25 Frogna1 NW3 6AR

07825 530022

From: **Alex Hyvonen** <[alex.hyvonen@gmail.com](mailto:alex.hyvonen@gmail.com)>  
Date: Mon, 10 Feb 2020, 19:00  
Subject: Development on/at 25a and 25c Frogal  
To: <[tassj@kias.services](mailto:tassj@kias.services)>  
Cc: <[info@kias.services](mailto:info@kias.services)>

Dear Ms Norval,

I reside at 35 Arkwright Road - I have only today been notified of the CMP for development at 25a and 25c Frogal in NW3.

I never received a copy of your letter dated 28.01.20 regarding this proposal which I understand is a requirement of the proposal.

As this is the first notification I have received I would formally like to request a copy of the CMP emailed out to this email address. And then, following my confirmed receipt of the CMP, I would appreciate the required 14 days to consider it and if appropriate, respond.

I look forward to hearing from you.

Kind regards,  
Alex Hyvonen  
35 Arkwright Road  
NW3 6BJ

From: **Karolina Lewestam** <[karolina.lewestam@gmail.com](mailto:karolina.lewestam@gmail.com)>  
Date: Mon, 10 Feb 2020, 19:35  
Subject: Objections regarding the CMP for construction in NW3 6AR  
To: <[tassj@kias.services](mailto:tassj@kias.services)>  
Cc: <[frogark@icloud.com](mailto:frogark@icloud.com)>

Dear Ms Norval,

we are the occupants of 25E Frogal and we are writing to you regarding the CMP for construction of two garages down the lane between 25a and 25c Frogal and rear of Meridian House. We would like to state the following:

- we haven't received the legally required letter notifying us that such construction is planned.
- We believe that the construction on Arkwright Road should be considered jointly with the garages,
- there is no plan dealing with the pressure impact of the construction vehicles,
- the principal constructors named in the CMP, Amirilian Management Ltd, have no assets and they would not be able to compensate for any damage done during construction. The construction shouldn't proceed until an insurance policy is presented.

In short, we agree with Mr Stoddard Martin, Mr and Mrs Bill Frankel, Ms Cherie Yeo, Mrs Yiyong Yang, Mr Ken Howard, Mr Ben Shorten, Mrs Lesley David, Mr Philip Mercer and Mrs. Barbara Dohmann.

We await your response.

Yours sincerely,

Karolina Lewestam  
Jakub Fast

From: **Josh Josh Jones** <[jones@joshjoshjones.co.uk](mailto:jones@joshjoshjones.co.uk)>  
Date: Mon, 10 Feb 2020, 20:36  
Subject: Frogna! work  
To: <[tassj@kias.services](mailto:tassj@kias.services)>

Good evening Ms Norval,

It has come to my attention that some very comprehensive construction works opposite my house on two sites that border the private road between 25a and 25c Frogna!. I, and many of my neighbours, have not received your letter regarding the CMP and demand that I/we have 14 days to object to these works. As a parent of a young child the dust from the works and pollution from constant lorries, heavy goods vehicles, vans and more can only have a detrimental impact on my family's lungs.

Frogna! is already a very congested road - so much so Camden Council are implementing a Healthy Streets zone, closing the southernmost end of Frogna! and surrounding roads to traffic during school drop off and pick hours (I refer you to this link <https://consultations.wearecamden.org/supporting-communities/nofhss/>). This may come into effect as early as April 2020 and will last for 12 months. This will affect your vehicles will it not?

With your two construction projects happening simultaneously and both being accessed down a narrow lane how are you going to prevent total gridlock on the roads with your vehicles belching out fumes on top of the general nightmare that is large construction projects for the surrounding neighbours?

Also, why have we not been consulted about this?

I look forward to your reply

Josh

**Josh Jones**

From: **Philip Mercer** <[philip@mercerc.uk.com](mailto:philip@mercerc.uk.com)>  
Date: Tue, 11 Feb 2020, 10:30  
Subject: 25a and 25c frogнал.  
To: <[tassj@kias.services](mailto:tassj@kias.services)>  
Cc: Philip Mercer <[philip@mercerc.uk.com](mailto:philip@mercerc.uk.com)>, Barbara Dohmann QC <[BarbaraDohmann@blackstonechambers.com](mailto:BarbaraDohmann@blackstonechambers.com)>, Ben Shorten <[benjamin.shorten@icloud.com](mailto:benjamin.shorten@icloud.com)>, Bill and Carol Frankel <[billfrankel@kayacomm.com](mailto:billfrankel@kayacomm.com)>, Lesley David <[lesleymdavid@googlemail.com](mailto:lesleymdavid@googlemail.com)>, Yiyong Yang <[yyy2005@gmail.com](mailto:yyy2005@gmail.com)>, Yeo Cherie <[CherieYeo@tfl.gov.uk](mailto:CherieYeo@tfl.gov.uk)>, CHERIE YEO <[cherie.yeo@virgin.net](mailto:cherie.yeo@virgin.net)>, Ken Howard <[kchoward1@mac.com](mailto:kchoward1@mac.com)>, <[steve.adams@camden.gov.uk](mailto:steve.adams@camden.gov.uk)>, <[oliver.cooper@camden.gov.uk](mailto:oliver.cooper@camden.gov.uk)>, <[maria.higson@camden.gov.uk](mailto:maria.higson@camden.gov.uk)>, <[andrew.parkinson@camden.gov.uk](mailto:andrew.parkinson@camden.gov.uk)>, <[henry.newman@camden.gov.uk](mailto:henry.newman@camden.gov.uk)>, <[stephen.stark@camden.gov.uk](mailto:stephen.stark@camden.gov.uk)>, Gio Spinella <[gio.spinella@camden.gov.uk](mailto:gio.spinella@camden.gov.uk)>, <[Georgja.Gould@camden.gov.uk](mailto:Georgja.Gould@camden.gov.uk)>

Dear Ms. Norval.

Works to garages at the end of the lane between 25a and 25c Frogнал NW3. This is the address in your letter of notification to neighbours. However the CMP refers to Garages Adjacent 25B &25E Frogнал & Rear of Meridian House (Finchley Road) London NW3 6AR. To those who are not conversant with maps and drawings these would appear to be two different sites.

My wife and I are signatories to the joint letter now sent to you.

We own 25E Frogнал NW3 6AR and the ground floor of 35 Arkwright RdNW3 6BJ, they are both tenanted.

I learnt late last week that a letter from you regarding the CMP for the garages in the lane between 25a and 25c Fognal had been sent out. Finding that neither of my tenants had received such a letter I asked neighbours who were on your list for notification. Few had received the letter.

I would like to know why the letter was not sent out to so many of the people on your list. Since it is a legal requirement to notify the people on your list and others in Arkwright Road, you have not complied with your obligations and no consultation can be see to have taken place.

I look forward to your response as a matter of urgency.

Yours sincerely

**Philip Mercer B.Arch ARIBA RIAS**  
A.P.Associates  
Studio 1, 79 Bedford Gardens, London W8 7EG  
Hillslap Tower, Melrose TD1 2PA  
Interno 1, via dei Polacchi 42, 00186 Roma  
Office/Home Tel: +44 (0) 207 794 7633  
Mobile: +44 (0) 7802 903 272  
Scotland Tel: +44 (0) 1896860276  
Rome Tel: +39 06 699 1355  
Email: [philip@mercerc.uk.com](mailto:philip@mercerc.uk.com)