25 HAMPSTEAD GROVE
LONDON NW3 6SR
[redacted]

Camden (Regeneration & Planning Development Management)
London Borough of Camden
Town Hall
Judd Street
London WC1H 8ND

28th August 2015

Dear Sirs

Planning Applications 2015/4485/P and 2014/5150/PRE
Grove Lodge Admiral's Walk London NW3 6RS

I have considered the above Planning Application and would like you to take this letter as my formal objection to this Application, for the following reasons:-

1. The demolition and redevelopment of part of this listed property, including a new extension, will have a detrimental effect on the property itself and in particular, on the iconic and historical significance of the view of this property and the adjoining Admiral's House.
2. I am concerned that the creation of a basement of the size envisaged, may have an adverse geological impact on neighbouring properties, and also could result in a possible change in the water table, or the diversion of underground streams in this area.
3. Orangery – I am concerned as to the footprint size of the Orangery and consider that it will result in an adverse visual impact, as well as the fact that this could set a precedent for back garden development in this conservation area.
4. The development in terms of inconvenience and nuisance to local residents during the construction period will be severe, particularly in terms of traffic management in the narrow roads of Admiral's Walk and Lower Terrace.
5. If Planning Permission is granted for the Proposals, as submitted, this will set a precedent in the local area, which could then be relied upon by other listed residential properties currently contemplating development within the vicinity of Grove Lodge.

I would appreciate if you could take the above comments into account, when you are considering this Application.

Yours faithfully

[redacted]

Lynda Hay

Reed Smith LLP
The Broadgate Tower
20 Primrose Street
London EC2A 2RS
[redacted]
reedsmith.com

Julia Berry
[redacted]

9 September 2015

Our Ref: JB\AB\999947.20596

Mr Whittingham
Planning Officer
Westminster City Council
Westminster City Hall
64 Victoria Street
London
SW1E 6QP

Dear Mr Whittingham

Grove Lodge, Admirals Walk London NW3 6RS – planning application ref 2015/4485/P and listed building application ref 2015/4555/L

We act on behalf of Mr and Mrs Gardiner, owners of Admirals House, the property adjoining the application site referred to above. Both properties are listed buildings, situated within a conservation area.

We are writing further to your recent correspondence with our clients in respect of specific points which we require the council to address as follows:

1. In response to our clients' letter of 2 September 2015 concerning the disclosure of the Campbell Reith Audit of the basement element of the above application, your e-mail response of 4th September 2015 states that the disclosure of this report is "at the discretion of the applicant." This cannot be correct, and if this is the normal practice of the Council we respectfully point out that such practice should be revised in respect of all current and future applications. As a document which constitutes a material consideration within the planning process this Audit must be disclosed and placed on the Council's planning portal in the normal way. Please confirm this will be done forthwith. We see no need therefore to make a formal request under the Freedom of Information Act but if this document is not disclosed as requested within 5 working days of the date of this letter, please treat this as a formal FOIA request and provide it to us forthwith.

2. With regard to your response by way of email dated 4 September to our clients' letter of 1 September 2015:

    (i) You do not answer the question raised by our clients at their paragraph (1), which was directed to Campbell Reith's Audit on the pre application review

and whether they were shown the First Steps Report submitted in respect of the first application. Could you please respond to this query - were they shown that report or not?

(ii) You do not answer the question raised by our clients at their paragraph (3), namely can you confirm that the reports submitted on the Gardiners' behalf on 3 September 2015 by First Steps and Eldreds will be sent to and considered by the independent auditors. This is clearly an essential part of the process and needs explicit confirmation. There is a major and material difference of opinion between the views of those acting for the applicants and the conclusions of the consultants reports submitted by the Gardiners and Seatons in respect of the structural viability of the adjacent properties. The disputed issues are of a technical nature (eg soil/water analysis), and Campbell Reith must be given an opportunity to consider, respond to and comment on them so that the Council can properly take these into account in their planning considerations. An auditor cannot make a proper assessment if all the available information is not before them, and these are not matters on which the Council can otherwise take a view.

3. We understand that neither of the reports commissioned by the Gardiners and the Seatons have yet been uploaded onto the Council's planning portal, nor have some twenty-odd objections submitted over a week ago, yet some sent far more recently do already appear. Could you please explain why the reports referred to, and these other objections have not been disclosed publicly yet, and please confirm the situation will be remedied forthwith.

4. Could you please clarify a point of policy for us in addition. The Council's current Local Plan policy DP27 does not impose any restrictions on the construction of basements under listed buildings but we understand that the revised Local Plan, currently going through the adoption process, has a new policy within A5 which prevents basements under listed buildings completely. Although this policy has not been formally adopted yet, we understand that the consultation has closed and some minor amendments arising from that consultation are currently being made, with the proposed submission document due to be published very shortly, prior to an Examination In Public later this year/early in 2016, with adoption will follow in mid-2016. Could you please confirm these timings and in particular whether the specific part of policy A5, preventing basements under listed buildings is likely to undergo any changes. If not, can we assume this policy will remain intact and therefore great weight should be afforded to it immediately, particularly in respect of these current applications.

5. Finally, please also confirm that a copy of the further report to be issued by the independent auditors will be made available in sufficient time to allow for objectors such as our clients to review and make their responses to it so that they can be included in the report to the committee prior to the applications being determined. If you have any difficulties in this respect please treat this as a formal request under the Freedom of Information Act, and notice that our clients will consider what action is available to them to challenge any decision taken without the benefit of their response.

We await your urgent response.

Yours faithfully

Reed Smith LLP

cc: Andrew Maughan
Amelia Walker
Frances Wheat
Mike Cooke
Tom Currie
John Gardiner QC
Mrs P Gardiner
Hampstead Conservation Area Advisory Committee

REDINGTON FROGNAL ASSOCIATION
Umbrella body for residents groups in the Redington Frognal Conservation Area

6 September 2015

Dear Mr. Whittingham,

Planning applications 2015/4485/P and 2015/4555/L

This is a massive and highly complex development proposal, involving substantial engineering works and tree fellings. It will unleash considerable destruction both on Grove Lodge and the adjacent listed buildings.

Redington Frognal Association wishes to register a strong objection on the following grounds:

- serious harm to the setting of the listed 18th century Grove Lodge;
- demolition of the front porch and resultant damage to the historic farmhouse façade;
- demolition of the 1920s Galsworthy extension and its replacement by a new-build;
- take-up of half of the garden for the proposed basement;
- the gratuitous felling of a mature lime tree, forming part of a lime avenue. The replanting scheme, however, is welcome;
- the proposed new two-storey wing, creating further over development;
- lack of any serious evaluation of the impact of the proposed basement on Admiral's House and Terrace Lodge.

We additionally object to any basement development beneath a listed building and especially where an underground watercourse and an active open well exist.

The development proposal title, "regeneration and restoration", might be more accurately described as "destruction and harm to a heritage asset and its setting".

Yours sincerely,

Rupert McNeil
Chairman
Redington Frognal Association

www.redfroghampstead.org

Henry, Genna

From: [redacted]
Sent: 07 September 2015 13:41
To: Planning
Subject: planning application 2015/4485/P and 2015/4555/L admirals walk - [redacted]

dear sir/ madam,
i have just returned from summer holidays
i underdtand there are new planning applications to admirals walk NW3
i sent mu objections last time application was put in
beacause i have been away please accept these comments in good faith even though they are a little late
i stand by my previous objection and wholeheardedly support all new comments raised objecting to these horrendous plans.
i do trust the current staff at camden council will take care of this historic and beautiful part of the world and not approve senseless applications that do not enhance in any way the original buildings and sites of hampstead NW3
kind regards,

a . sheffield
direct mobile: 00 44 (0)7971 860 373

Henry, Genna

From: Whittingham, Gideon
Sent: 07 September 2015 14:07
To: Planning
Subject: FW: Grove Lodge, Admiral's Walk - [redacted]

Gideon Whittingham
Senior Planning Officer (East Area Team)

Telephone: 020 7974 5180

From: Jessica Learmond-Criqui [mailto:jlc@lawlcs.com]
Sent: 04 September 2015 18:38
To: Whittingham, Gideon
Subject: RE: Grove Lodge, Admiral's Walk - 2015/4485/P and 2015/4555/L

Grove Lodge, Admirals Walk
New Planning Applications
2015/4485/P and 2015/4555/L

Dear Mr Whittingham,

I wish to object to these applications on the following grounds:

A. External Appearance

Grove Lodge is listed Grade II building and is part of this iconic corner of Hampstead. Constable was a fan, painting it and Admirals House on a number of occasions. Many visitors come to Hampstead to see the current view as painted by Constable.

Admirals House was the home of the Captain in the film Mary Poppins. It is difficult to conceive of a corner of Hampstead which is more quintessentially Hampstead than this.

Part of the beauty of Hampstead lies in its historic features, including remnants of the past which form very much part of the present. The front elevation features of Grove Lodge form one such historic feature in respect of which the current owners are the guardians for future generations.

The current plans include a new front entrance with an adjacent window and the removal of the current front door porch which is to the right side of the building. The wall of the old porch is also brought forward. These features are vital for the character of this building which was built as a farmhouse.

The demolition of this important feature will lose its heritage which brings tourism to Hampstead and will adversely affect the income which may be generated from such visitors and which benefit shops which are vital for the survival of our high street.

The Hampstead Conservation Area Design Guide Advice on alterations and repair following the introduction of an Article 4(1) Direction (adopted 2010) paragraph 2 Alterations to porches states:

> "*Adding a new porch or altering existing porches or porticos on front elevations (or side elevations where this fronts the street) now needs planning permission and <u>will be resisted</u>.*"

As a listed building, this part of the plans should be rejected.

B. Basement

I am aware of the concerns raised by the owners of Admiral's House, particular in relation to the potential harm which may befall Admiral's House, a 6 storey house with no foundations.

I do object to the basement on the grounds set out by the Gardiners which is set out below and which I adopt.

1 <u>The "basement"</u>

There is an existing small wine cellar at Grove Lodge of some 20m^2 with low headroom. What is proposed is an "extension" of this (although it has to be demolished and rebuilt) extending to some 220m^2 covering approximately half the area of the substantial garden (and providing eight rooms of accommodation equal to approximately three times the average Camden dwelling). Marginally smaller than before (although the original application gave no figures).

This proposal is objectionable for all of the following reasons:

(1) It is a massive overdevelopment of the site and that is especially so when taken in conjunction with the major new wing on two floors to be developed above ground. These works will take 1,462 vehicle movements over an eighteen to twenty four month period through the narrow lanes around Grove Lodge and the closure of many resident parking bays.

(2) It puts at serious risk in particular the two adjacent listed structures – the iconic Admirals House, some six storeys high, built in about 1700 without foundations and Terrace Lodge, an eighteenth century villa. The ground here is renowned for its water courses close to the source of the River

Westbourne. The consultants responsible for these proposals are the same as those responsible for the previous – described by one of the country's leading hydrologists as "dangerous". Those proposals, not surprisingly were abandoned in favour of entirely new proposed works as to which our advisers (who will be submitting technical reports) have no greater confidence. Once our consultants reports are in we would be content to abide by the views of any other independent firm (of hydrologists and structural engineers) of repute (who have not already advised on or considered the matter) because we are confident that they would have to reject this proposal.

(3) Admirals House has an open well in its semi basement immediately adjacent to Grove Lodge from where one can see the entry of water at different levels. This provides the most significant evidence of water location and depth. Those acting for Grove Lodge have chosen to ignore the actual data relating to the well (and the evidence of substantial holes having arisen in the roadway of Admirals Walk and other evidence) in favour of their own guesstimates. Although the existence of the well and its water flows was well known to the applicants before their first planning application, they allowed their consultants to state that no wells existed within 100m of Grove Lodge.

(4) This year Camden put out for consultation new proposals (section A5) which it wishes to adopt relating inter alia to basement developments. The consultation period is over but the proposals are not to be formally adopted as policy until 2016. They propose, for good reason, that permission should not be given to development involving excavation under listed buildings and in their gardens. Camden clearly considered this was appropriate, otherwise it would not have put it forward. In accordance with the National Planning Policy Framework (paragraph 216 and Annex 1) it is appropriate in this application to take the proposed policy into account and having regard to the developments proposed size and the fact that it is not to be implemented until at the earliest 2017 permission should not be granted.

I understand that the owners of Admiral's House have commissioned a report from Michael de Freitas on the current plans and will consider that report further when it is available. Following a review of that report, I may wish to make further representations in relation to the basement.

I would invite you to reject these proposals.

Best Regards

Jessica

Jessica Learmond-Criqui
Learmond Criqui Sokel LLP, Solicitors

Partner – Employment & Executive Immigration Law

[redacted]

3 HEATH MANSIONS
HAMPSTEAD GROVE
LONDON NW3 6SL

27th August 2015.

Regeneration & Planning Development Management Department.

Application Nos 2015/4485/P and 2015/4555/L Grove Lodge, Admirals Walk, Hampstead.

Dear Sir/Madam,

We are concerned about this development and oppose it on two major grounds as well as a number of more minor considerations.

1. It is a gross overdevelopment of the site, turning a modest property into a mansion which will as well cause great inconvenience to execute in a confined area, will encroach on a public right of way and destroy some historic features.

2. The huge basement development

Sounds very unwise indeed for technical reasons & do with hydrology. Hampstead is notorious for these problems and there is a well in the adjacent dwelling.

For these two reasons we oppose the development.

Yours faithfully

[redacted]

Alice Ireland.