

**ReedSmith**

Reed Smith LLP  
The Broadgate Tower  
20 Primrose Street  
London EC2A 2RS

Julia Berry  
[REDACTED]

[REDACTED]  
DX1066 City / DX18 London  
reedsmith.com

3 December 2015

Our Ref: JB\GJO\762073.00001

**By Hand**

Gideon Whittingham  
Senior Planning Officer (East Area Team)  
Regeneration and Planning  
Culture and Environment  
London Borough of Camden  
5 Pancras Square  
London  
N1C 4AG

Dear Mr Whittingham

**Grove Lodge, Admirals Walk London NW3 6RS**  
**Planning Application Ref: 2015/4485/P and Listed Building Application Ref: 2015/4555/L**

Further to my email of 1st December attaching three documents, I am enclosing hard copies of these for your attention.

Kind regards.

Yours sincerely

[REDACTED]  
[REDACTED]  
**Julia Berry**  
Counsel

Enclosures

Reed Smith LLP is a limited liability partnership registered in England and Wales with registered number OC303620 and its registered office at The Broadgate Tower, 20 Primrose Street, London EC2A 2RS.  
Reed Smith LLP is authorised and regulated by the Solicitors Regulation Authority. A list of the members of Reed Smith LLP, and their professional qualifications, is available at the registered office.  
The term partner is used to refer to a member of Reed Smith LLP, or a partner of an associated entity, or an employee of equivalent standing.

Reed Smith LLP is associated with Reed Smith LLP of Delaware, USA and the offices referred to below are offices of either Reed Smith LLP or Reed Smith LLP of Delaware, USA.  
ABU DHABI • ATHENS • BEIJING • CENTURY CITY • CHICAGO • DUBAI • FRANKFURT • HONG KONG • HOUSTON • KAZAKHSTAN • LONDON • LOS ANGELES • MUNICH • NEW YORK  
NORTHERN VIRGINIA • PARIS • PHILADELPHIA • PITTSBURGH • PRINCETON • RICHMOND • SAN FRANCISCO • SHANGHAI • SILICON VALLEY • SINGAPORE • WASHINGTON, D.C. • WILMINGTON

EME\_ACTIVE-562755231.1-JBERRY 12/02/2015 5:24 PM

**Admirals House  
Admirals Walk  
Hampstead  
London  
NW3 6RS**

Gideon Whittingham Esq.  
Regeneration and Planning Development Management  
London Borough of Camden  
Town Hall  
Judd Street  
London  
WC1H 8ND

**By courier and e-mail**

1<sup>st</sup> December 2015

**Grove Lodge, Admirals Walk, London NW3 6RS**

Response on Heritage Planning Aspects to Report dated 23<sup>rd</sup> September 2015 from Planning Potential.

Application for Planning Permission ref: 2015/4485/P  
Application for Listed Building Consent: 2015/4555/L

1 Introduction.

- 1.1 This report is written in response to the Report by Planning Potential dated 23<sup>rd</sup> September 2015 in relation to heritage matters. We engaged the Conservation Studio (Mr. Edmund Booth) to produce a heritage report in respect of these applications. Mr. Booth's qualifications and experiences are set out in paragraphs 1.3 and 1.4 of his report of 21<sup>st</sup> September 2015 (the Existing CS report). The author of the Planning Potential Report ("the PP Report") is a Ms. Grace Mollart but she does not set out her qualifications and experience.
- 1.2 The PP Report was plainly written without having sight of the Existing CS Report. By letter dated 27<sup>th</sup> November 2015 Mr. Whittingham, the case officer at Camden, has effectively given us two working days to respond to the PP Report. In the absence of Mr. Booth this report is written by Mr. Gardiner, relying largely on the content of the existing CS Report.
- 2 Comments on the PP Report, particularly the paragraphs under the heading "Heritage, Design and Amenity".

### Overdevelopment

- 2.1 This concept is not one just of comparative figures/proportions. The application proposes a new underground development involving an excavation of some 288m<sup>2</sup> under a private listed residential dwelling with an existing small cellar of some 20m<sup>2</sup> which has served the house for the last two centuries or so, and which will effectively have to be rebuilt to be incorporated into the new construction. The construction involves the construction of eight new rooms with ceiling heights greater than the rooms proposed above ground. The origins of Grove Lodge inherent in its listed status are of an old farmhouse and as an ancillary building to the adjacent significantly larger Admirals House. Despite what is said in the PP Report, in these circumstances, one can conclude that the proposal involves an overdevelopment of the site.

### Extension and External Alterations

- 2.2 It is suggested in the original Heritage Appraisal put in by Portico Heritage on behalf of the Applicants that the Galsworthy extension will "be retained and will remain completely intact, visually unaltered from the front elevation." This is supported by the PP Report. This frankly is incredible and positively misleading. The true effect of the proposals is set out at paragraphs 6.9 to 6.15 of the Existing CS Report and are not repeated herein. But these changes not only have a substantial effect on the appearance of Grove Lodge; they also alter the functions of the significant heritage aspects of the building. The old entrance porch to the farmhouse is destroyed and such action is contrary to Camden's Conservation Area Statement Policy for any building let alone a listed building but it is particularly so here being a significant part (the entrance) to the old farmhouse. The subservient "lean to" Galsworthy extension is then made as the new entrance (again contrary to its historic function) to a significantly enlarged modern house now dominating and diminishing the historic significance of the old farmhouse and its relationship with Admirals House.
- 2.3 The above factors clearly establish substantial harm to the historic significance of the listed building and since no public benefit is claimed (nor could be), these applications must be rejected for this reason alone.
- 2.4 It is said that the current proposals were the subject of "significant consultations with neighbours and the one proposed met the wishes of most of their neighbours". However this is a misrepresentation of the facts – a group of neighbours were presented with three possibilities – the first two being slightly reduced versions of the original proposal which had been overwhelmingly rejected and the third presented as being an attempt to preserve the existing facade which is what it is still presented as being but in truth is nothing of the kind.
- 2.5 In the PP Report and its Appendix A produced by Portico it is suggested, in effect, that there is no significant alteration to the Galsworthy extension elevation. This again is a simple misrepresentation of the facts for the reasons given above and in the Existing CS Report. It is simply akin to declaring that

that which is black is white and hoping that the reader will not notice the difference.

- 2.6 The "secondary door" referred to in the Portico Annex Report is the entrance to the passageway between the garage and the house. It is not part of the elevation of the house. The garage first constructed in John Galsworthy's time, has always been separate from the house (and so has its present replacement), the Galsworthy extension always subservient to the rest (the old farmhouse) and I understand that this door was erected without planning or listed building consent; it has certainly never been an entrance to the house.
- 2.7 The matter is not a question of repositioning this door but of making an entirely new entrance to the house (and serving the new extension) and thereby making the house in function and appearance quite different from its historic antecedents thereby leading to their loss.

To state, as the Portico Annex to the PP Report does, that "The Heritage Statement is not inaccurate with regards to the Galsworthy extension" is to put forward a manifest falsehood.

### 3 Conclusion

There is nothing in the PP Report to detract from the conclusions stated in the Existing CS Report. Indeed, the PP Report simply seems to be based on misrepresentations of the facts. The position in relation to the basement proposals has been considered by others especially Dr. de Freitas and what is said in relation to the footpath is simply unfounded assertion as demonstrated by the letter to Camden of 26<sup>th</sup> May 2015 and its enclosures (a letter still awaiting a substantive response).

  
John Gardiner