
THE VICTORIAN SOCIETY
The champion for Victorian and Edwardian architecture

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Your reference: 2016/0745/P; 2016/1128/L
Our reference: 2016/03/014

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Dear Mr Gracie

**RE: Belsize Fire Station (Grade II*, *Charles Canning Winmill, 1912-15*);
conversion to residential including extensions and insertion of roof dormers**

Thank you for consulting the Victorian Society on this application, which was discussed by our Southern Buildings Committee at its most recent meeting and I write now to convey their comments. We **object** to the proposals which do not present an appropriate treatment for what is one of the best examples of a fire station in the country.

Belsize Fire Station was one of the last of the London County Council's Edwardian fire stations to be built, belonging to a group of buildings considered to be some of the most accomplished pieces of architecture in London of that period. From 1896 the Fire Brigade Branch of the LCC's Architects Department had been particularly inventive in their endeavours under the leadership of architects Owen Fleming and Charles Canning Winmill. It was the latter who was responsible for Belsize Fire Station and he produced what is probably the department's most refined and creative design, employing a characterful Arts and Crafts idiom to a municipal building. This quality is reflected in its listing at Grade II* which makes it a building of 'more than special interest', a distinction which only 5.5% of all listed buildings merit. It also happens to be one of the least altered London fire stations.

Both the Heritage and Design & Access statements submitted as part of the application cite the wrong listing description, selecting the original description of 1974 rather than the updated 2009 version, when the listing category was importantly upgraded to II* and the significance of the asset described at length. As it is made clear in paragraph 132 of the NPPF, a Grade II* listed building benefits from considerably higher protection than a Grade II listed building. Whether deliberate or not, this is a very misleading mistake and undermines the entire application, as the building has been approached as a heritage asset of lesser value (and therefore capable of sustaining greater change).

The proposals to convert the fire station to residential use following its closure are in part sensible, though clearly not all of the fire station is suited to this change. The proposals for the appliance room in particular present an unacceptable level of harm.

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In its present state it is almost as built, retaining its original volume and hard character with its glazed brick walls. It is supposed to be a large open space, capable of housing three large engines and therefore subdividing it will detract from its significance considerably. As has already happened at several other listed London fire stations, this space is better suited to use as a restaurant for example, as it could be utilized effectively without the necessity for partitions. This would ensure that the original plan form of the fire station is retained, mentioned in the updated listing description as a reason for its designation and significance. Paragraph 131 of the NPPF refers to *'the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation'* – complete residential use is evidently not consistent with the conservation of the fire station. Therefore it is unlikely to be the building's optimum viable use; according to Planning Guidance Paragraph 015 this use *'is the one likely to cause the least harm to the significance of the asset'* and *'may not necessarily be the most profitable one'*. There are likely to be a variety of viable commercial uses.

Secondly, the introduction of dormer windows to the roof of the Eton Avenue elevation will also cause a high level of harm. Historic England and the London Fire Brigade's joint guidance 'London's historic fire stations' (2010) is very clear on this point, stating that *'roof profiles of fire stations are most commonly an integral part of the overall design. It will be unlikely that adding any additional stories or interrupting the roof profiles will be acceptable'*. The starkness of this roof-scape is incredibly important to the overall aesthetic of Belsize Fire Station and it should remain unbroken. Appearing rather top heavy, it is very evocative of a large thatched roof in the vernacular tradition – which was the source of inspiration for the Arts and Crafts movement. Conservation roof lights are likely to present the same issue and we would prefer any new sources of light and ventilation to be confined to the Lancaster Grove side which does not present such an eloquent, cottage inspired design.

Considering the above, we recommend that this application is **refused**. As the application stands, the harm to this highly listed building is not justified. The argument is already weighted in favour of conserving the heritage asset and as luxury housing is all that's proposed, there are no real public benefits presented that can begin to outweigh the harm.

Yours sincerely

Alex Bowring
Conservation Adviser

cc.

Mike Dunn, Historic England

Tess Pinto, Twentieth Century Society