

# FORMER BELSIZE PARK FIRE STATION - TOWER 36 LANCASTER GROVE, LONDON NW3 4PB

## APPEAL STATEMENT OF CASE

LONDON BOROUGH OF CAMDEN  
LPA REF: 2018/4394/P & 2018/4910/L

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## 1.0 INTRODUCTION

- 1.1 This statement accompanies an appeal against the decision by the London Borough of Camden ("*the Council*" hereafter) to refuse planning permission and listed building consent for works to the fire station tower at the former Belsize Park Fire Station, Camden.
- 1.2 The proposed development seeks conversion of the tower to provide a self-contained, 1-bed residential unit (LPA Refs: 2018/4394/P & 2018/4910/L).
- 1.3 The planning application, LPA Ref: 2018/4394/P, was refused for the following three reasons:
1. *The proposed development, by reason of poor-quality internal amenity, would fail to provide high quality residential accommodation, contrary to policies H6 and A1 of the Camden Local Plan 2017.*
  2. *The proposed development, in the absence of a legal agreement to secure car-free housing, would fail to promote healthy or sustainable transport choices, contrary to policy T2 of the Camden Local Plan 2017.*
  3. *The proposed development, in the absence of a contribution to affordable housing, would fail to maximise the contribution of the site to the supply of affordable housing in the borough, contrary to policy H4 of the Camden Local Plan 2017.*
- 1.4 The listed building consent application, LPA Ref: 2018/4910/L, was refused for the following reason:
1. *The proposed demolitions and alterations, by reason of loss of historic fabric and plan-form, would cause harm to the special architectural and historic interest of the Grade-II\* listed building, contrary to policy D2 Heritage of the Camden Local Plan 2017.*

### Background

- 1.5 Planning and listed building consents were recently issued by Camden Council for the conversion of the entire building, providing 18 self-contained flats with associated external and internal alterations, landscaping and parking. Those permissions are currently being implemented on site.
- 1.6 As a result of those permissions, the lawful use of the tower is residential, albeit no works to alter it were sought as part of the above consents. The extant permissions consciously omitted works to the tower as officers had raised some concerns at pre-app stage regarding the suitability of the proposed conversion of the tower. Accordingly, the works were omitted so as not to jeopardise the success of the remainder of the works, which were deemed acceptable.
- 1.7 We remain of the view that the conversion of the vacant tower, into an active and harmonious use with the rest of the consented works is appropriate and is proposed in a manner that is sympathetic to the heritage host.
- 1.8 This appeal statement sets out the appellants case against the LPA's decision to refuse permission.



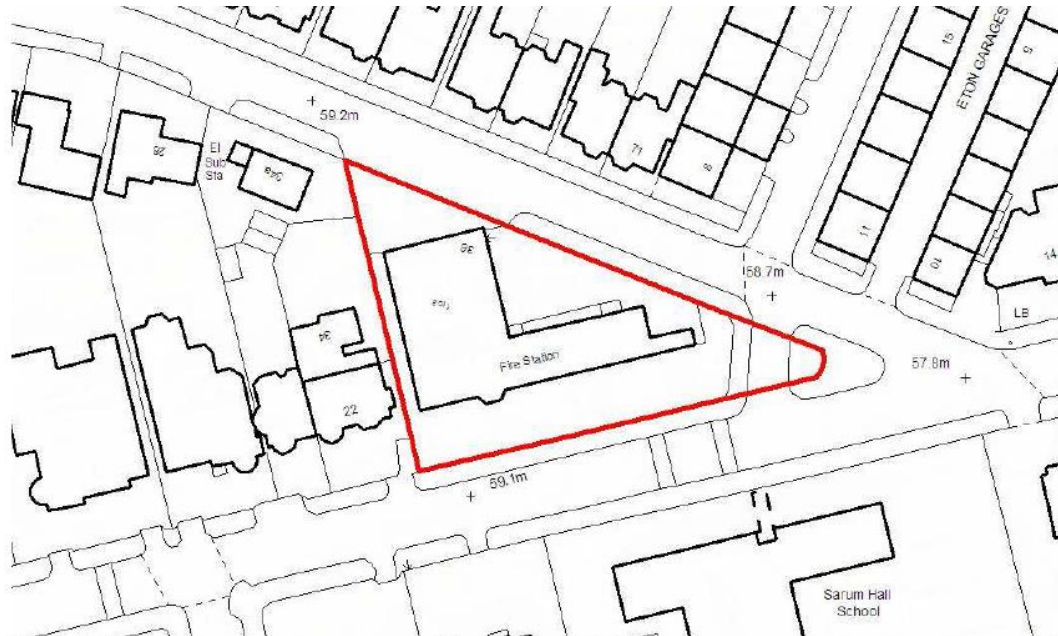
BELSIZE PARK FIRE STATION CONSENTED SCHEME CGI

### Structure of this Statement

- 1.9 Section 2 of this statement provides a brief description of the site and surrounding area.
- 1.10 Section 3 provides a summary of relevant planning history.
- 1.11 Section 4 details the policy framework against which the two appeals should be assessed.
- 1.12 In section 5 we set out the appellants grounds for appeal. We assess the Council's delegated report in refusing the proposed conversion.
- 1.13 Section 6 summarises and concludes this statement.

## 2.0 DESCRIPTION OF THE SITE

- 2.1 The former Fire Station lies in Belsize Park at the junction of Lancaster Grove (to the north) and Eton Avenue (to the south). The triangular shaped plot comprises 0.44 acres (0.1761 hectares). It is located within the Belsize Park Conservation Area and lies a short distance to the east of Belsize Park Underground Station.



SITE LOCATION PLAN

- 2.2 The building was designed by Charles Canning Winmill of the Fire Brigade Branch of the London County Council Architects Department, erected 1914-5. The building is Grade II\* listed and is of special architectural merit.
- 2.3 The building has an L shaped plan and comprises a part basement, ground/upper ground and first floor levels. There is also a substantial roof void at second floor level.



BELSIZE PARK FIRE STATION (NORTH ELEVATIONS)

- 2.4 Planning and listed building consents granted in June 2017 allow conversion, extension and alteration of the building to provide 18 self-contained flats.
- 2.5 Construction works relating to the above consents are well advanced on site.



CONSTRUCTION WORKS IN PROGRESS ON SITE

- 2.6 Accordingly, the focus of this appeal is the internal, integrated former drill tower arranged over four upper floors (exterior image, right).
- 2.7 Elevations are constructed principally from brick.
- 2.8 High architectural quality of an Arts and Crafts style is manifest in its external design, detail and materials.
- 2.9 The building is mostly intact, having not been extended or significantly altered externally in the past.



TOWER EXTERIOR

- 2.10 Internally, the tower accommodates the central stair core void linking the ground, first and second floor levels.
- 2.11 Within the tower itself, the main staircase is succeeded by a narrower, circular-stair situated in the south-west corner giving access to the upper levels of the tower.
- 2.12 The finish more generally is robust, with exposed brick internal elevations and exposed concrete floors, with white painted ceilings.



TOWER INTERIOR

- 2.13 Upper levels of the tower comprise a single space at each floor around the central opening/void enclosed by railings.
- 2.14 There is a west-facing window at each level, with an additional east-facing window at fourth-floor level.



WEST-FACING WINDOWS AT EACH LEVEL

- 2.15 The roof of the tower, currently accessed via a roof hatch, provides exceptional views over London.



VIEW FROM TERRACE (RESIDENTIAL PROPERTIES FRONTING LANCASTER GROVE)



**3.0 PLANNING HISTORY**

*a) Background*

3.1 On 12 September 2013 the London Fire and Emergency Planning Authority approved the Fifth London Safety Plan (LSP5). LSP5 outlines a wide range of policies and measures which are intended to improve the safety of Londoners. Amongst other things, the document set out proposals to find significant cost savings over the next two years. Part of those measures reviewed the Authority’s largely freehold estate comprising 112 stations, characterised by a significant number of ageing buildings; a third of which were listed and in need of repairs and improvements. An asset management plan completed in 2012 found that only 54 per cent of the fire stations were considered ‘suitable’ (fit for fire service purposes). It was determined that some of the estate would be released, which included the Belsize Fire Station.

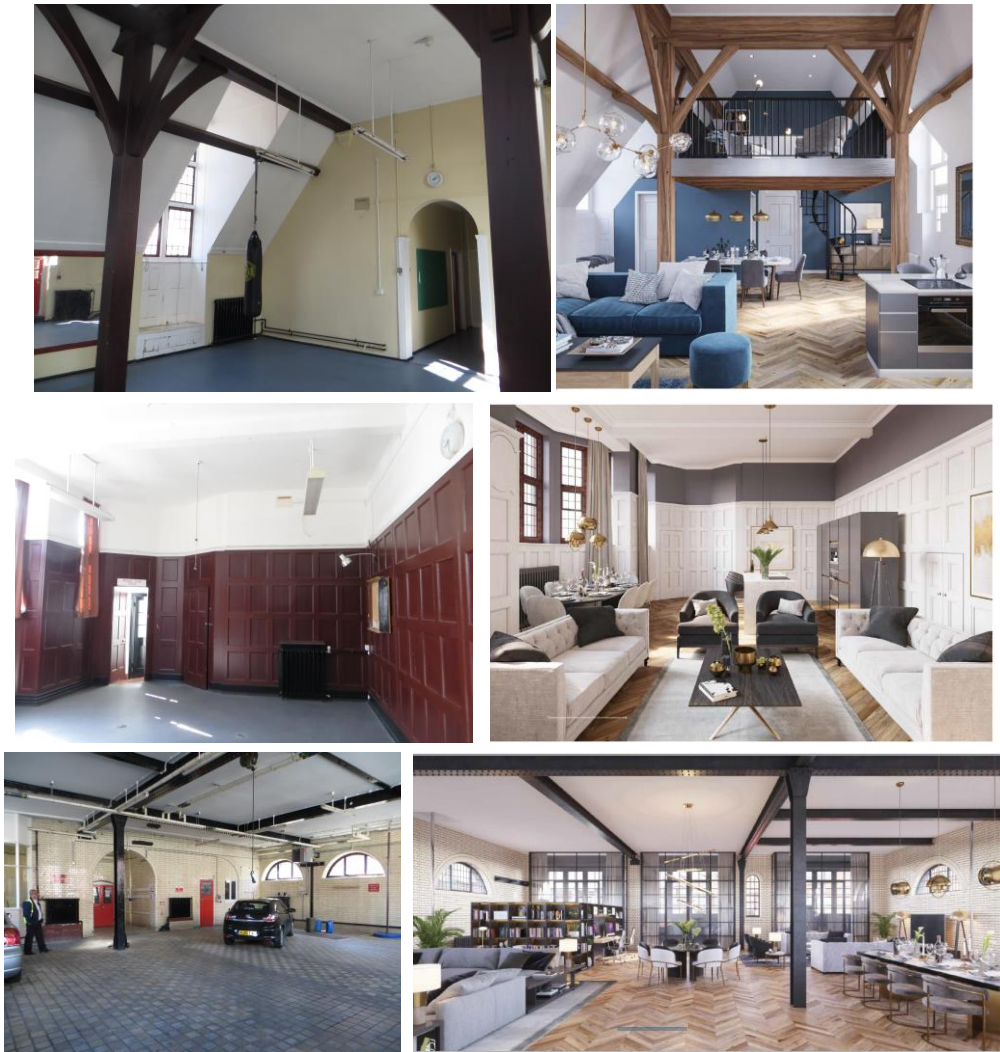
*b) Planning Permission and Listed Building Consent*

3.2 In 2017, Vulcan Properties were granted planning permission and listed building consents for the change of use, alteration and extension of the former fire station to provide 18 self-contained residential units (LPA references 2016/0745/P, 2016/1128/L, 2016/5813/P, 2016/6119/L).



3.3 Externally, the main physical changes to the building included the demolition and rebuilding of the single storey former fuel store at the eastern end of the site; provision of 13 new dormer windows including 5 new dormer windows on the southern roof slope, in order to activate its usage as habitable space; and the further excavation of basement level together with lightwells/terraces, to serve the new basement level of living accommodation.

- 3.4 Internally, the proposals generally took a fabric first approach, with a straightforward conversion of most of principal spaces within the building. Notwithstanding this, areas within the building which were more ‘non-descript’ allowed a greater level of intervention including new plan layouts and internal floor and wall finishes. With regard to the lower part of the tower/staircore, from the ground floor, a cylindrical glass lift was approved, serving the upper floors. In approving this lift, officers stated that the main void would remain visible, will be differentiated and reversible and would allow continued appreciation of the characteristic and historic staircase.
- 3.5 The permissions, providing 18 new residential units, did so in a sensitive manner and would preserve the important elements of the listed building. Officers considered that the public benefits of the proposal, principally ensuring the long-term sustainable future of the grade II\* listed building, and provision of 18 new residential units, would outweigh the limited harm caused.
- 3.6 These permissions are currently being implemented on site.



EXISTING AND APPROVED (GCI) CONVERSION WORKS  
 (FORMER GYM AT FIRST FLOOR (TOP); MESS ROOM AT GROUND FLOOR (MIDDLE); APPLIANCE BAY (BOTTOM))

### c) Relevant Local Precedent Cases

*Rose Cottage, Vale of Heath, London NW3 1AX  
2017/7064/L*

3.7 The application site comprised a Grade II listed cottage situated within the Hampstead Conservation Area that had been the residence of Alfred Harmsworth, 1<sup>st</sup> Viscount Northcliffe. The proposed works included alterations to the existing chimney, removal of chimney breasts and associated internal changes.

3.8 The property is listed alongside Woodbine Cottage which adjoins to the south. Both properties were listed in 1974:

*“Two cottages. Early C19. Weatherboarded. Pantiled roof. Two storeys. One window to each cottage. Main entrances on east side... Right-hand cottage with French doors to ground floor with pointed lights and architraved casement to first floor. INTERIORS: not inspected. HISTORICAL NOTE: Rose Cottage (formerly Hunt Cottage) was the early home (1870-3) of Alfred and Harold Harmsworth, newspaper tycoons. Woodbine Cottage was the home of Compton Mackenzie.”*

3.9 In their delegated officer’s report, it was considered that proposed internal alterations would have caused unreasonable harm to the significance of the heritage asset:

*“The chimneybreast and ...is a cardinal architectural element of any traditional domestic building, as is a staircase, roof or entrance lobby... The proposals would demolish the chimneybreast and adjacent partition wall with doorway, re-supporting the defunct chimneystack in the roof above. New vertical structural steels would be inserted on the flank and party walls on either side of the location of the existing chimneybreast, with the steels on the party wall concealed by nibs forming a false hearth at ground floor perpendicular to the original. At first floor, storage would be contained within their depth, and the removal of the fireplaces would facilitate formation of a partition in the front-most room to form a bathroom and further wardrobe.”*

*“The removal of the chimneybreast at ground-floor level would entirely combine the volumes of the two historic cellular rooms, and the proposed false hearth would appear centred between them on the party wall. **This would create an arrangement wholly atypical of any range of historic domestic service rooms and more suggestive of a single principal reception room, and would thus distort the spatial hierarchy of the house and obscure the way it functioned historically.** On the inner face of the flank wall, the build-up to contain the steels would appear as a shallow projecting element much wider than a nib that might typically be understood to indicate the location of an historic partition wall, so leaving no clear trace of the historic plan-form.*

*By irreversible removal of and structural intervention to functional and decorative historic fabric, subversion of the historic spatial hierarchy through loss of functionality and a construction of a distorting new arrangement, and by loss of designed historic room volumes and plan-form, the proposals would significantly diminish historic and architectural interest. The proposals would cause less than substantial harm to the listed building [but] there is no public benefit to outweigh the harm caused by the proposals... Only “spatial benefits” linked to the living preferences of the current owners and accruing entirely to them, and the “opportunity” to add a lateral structural tie for the flank wall are claimed as benefits. These being private or incidental in nature, they do not constitute public benefits either compatible with the conservation of the listed building or justifying its alteration. The application is recommended for refusal.”*



EXISTING AND PROPOSED LONG SECTIONS

3.10 An appeal was made to the Planning Inspectorate on 16<sup>th</sup> August 2018, which was subsequently allowed on 20<sup>th</sup> November 2018.

3.11 In making their determination, the Inspector had regard to the newly revised National Planning Policy Framework. We provide the relevant extract from the Inspectors decision, with our own **emphasis** added:

*“Rose Cottage’s special interest resides not only in its external architectural character and historical associations with former occupants that were luminaries of the press and publishing fields, but also in the evidence its existing plan form yields about the evolving status of the area, and the functional separation of the polite and workaday elements of the building.*

*The proposed works are internal and entail the removal of the chimney breast towards the middle of the outrigger at ground and first floor levels. A structural steel frame would be inserted to support the external elements of the chimney stack, which would remain. Elements of the structural steel at ground and first floor level would be concealed within wall build ups. A repositioned hearth would be constructed on the flank wall of the property at ground floor. The proposed works would facilitate an integrated kitchen, which is currently substantially bisected by*

*the existing hearth, and the construction of a bathroom at first floor to replace the one existing at the ground floor of the property.*

*I readily accept that the current plan form of the building as a whole involves a clear separation of the polite and more utilitarian elements, and that the outrigger's existing chimney breasts and hearths, due to their simplicity, aid an understanding of this functional separation. **Nevertheless, the proposed works, through the retained 'nibs' containing the structural steelwork would still allow the pre-existing plan form to be read.** Moreover, although the proposed works would result in a larger kitchen room, this would, due to its overall proportions, and the presence of a repositioned hearth, still retain a functional nature, in clear contrast to the more polite character of the principal rooms. **Consequently, the proposed works would not erode the evidential significance of Rose Cottage to a degree that would fail to preserve the building or its special interest.***

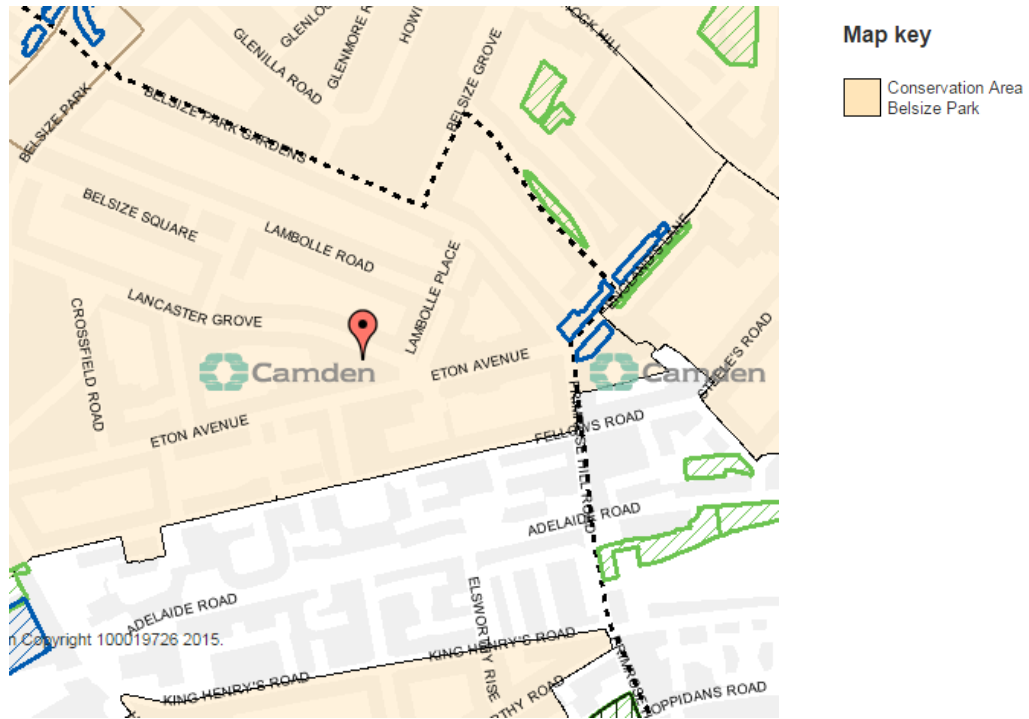
*... Moreover, the appellant is pursuing other works to the property, for which planning permission and listed building consent have been granted by the Council. **These other works would assist in the refurbishment and structural integrity of Rose Cottage, and I note the appellant's comments to the effect that the property had not been maintained or refurbished for some time prior to their acquisition of it.** The proposed works would be part of this overall programme and would **help to facilitate a more viable use for the property helping to secure its ongoing conservation - a matter to which I accord considerable weight in the overall balance.***

*Mindful of the duty arising from Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the Act), these considerations, taken together **lead me to the conclusion that the proposed works would preserve the listed building and its special character.** Moreover, the proposed works would not have any external effect to Rose Cottage's appearance, and therefore, mindful of the duty set out in Section 72(1) of the Act, **I conclude that the character and appearance of Hampstead Conservation Area would be preserved.** For these reasons also I find **no conflict with Policy D2 of the Camden Local Plan (adopted July 2017), or the Framework** insofar as they seek preservation of Camden's heritage assets, and to ensure that heritage assets are conserved in a manner appropriate to their significance."*

**4.0 POLICY FRAMEWORK**

4.1 The relevant planning framework comprises the National Planning Policy Framework (NPPF 2018), Mayor’s London Plan (draft 2018) and the Camden Local Plan (2017).

4.2 The latter confirms that the site falls within the Belsize Park Conservation Area. The property is also Grade II\* listed.



POLICIES MAP EXTRACT

## 5.0 GROUNDS OF APPEAL

5.1 In this section, each Reason for Refusal will be assessed in turn.

### *PLANNING APPLICATION (LPA Ref: 2018/4394/P)*

5.2 With regard to the planning application, the first Reason for Refusal reads as follows:

*“The proposed development, by reason of poor-quality internal amenity, would fail to provide high quality residential accommodation, contrary to policies H6 and A1 of the Camden Local Plan 2017.”*

5.3 In light of the grade II\* listed nature of the building, and the unique configuration of the existing tower, the applicants have taken a fabric-first approach to the development. This approach is consistent with that which the LPA advocated for the remainder of the building, currently being converted to 18 self-contained flats.

5.4 Notwithstanding this, the overall flat approximately complies with the nationally described minimum internal space standards. The entrance to the proposed flat is at second floor level. Access to this level can be taken via stair or lift from ground floor, the latter approved as part of the parent consent for 18 units. On entry, the flat is served with a lobby/cloak area followed by a good sized open-plan kitchen and dining room on the third floor, together with living room and enclosed bathroom on the fourth floor and double bedroom located at fifth floor.

5.5 All rooms benefit from existing west facing windows providing natural light and ventilation. Finally, the unit will benefit from a private terrace on the roof, well in excess of minimum standards and with unprecedented views in this location.

5.6 In their delegated report, officers acknowledge that ‘the proposed floorspace would be acceptable in consideration’, however, in their view there were concerns in relation to:

- Substandard floor-to-ceiling heights
- Natural light
- Outlook

### *Floor-to-Ceiling Heights*

5.7 The national technical space standards state that “*the minimum floor to ceiling height is 2.3m for at least 75% of the Gross Internal Area*”.

5.8 At third-floor level, the floor-to-ceiling height would be 2.53m; at fourth floor level, 2.22m; and at fifth floor level, 2.19m.

5.9 The third-floor level would constitute the primary living space within the proposed flat; at this level the floor-to-ceiling height is well in excess of the minimum specified by the technical space standards.

5.10 At fourth and fifth floor levels, the respective discrepancies are 0.08m and 0.11m. These deficiencies are marginal and should not constitute a valid reason for refusal. As the kitchen/dining space at third-floor level would be the primary habitable room, it is considered that the minor shortfalls at upper levels should be acceptable on balance.

- 5.11 If the appeal site was not Grade II\* listed, it would be simple to adjust the floor slabs so that floor-to-ceiling heights would be compliant with technical standards; however, in appreciation of the heritage value of the site, the slabs remain in situ and the best design possible, in terms of spatial arrangement, is proposed for future occupants. This justification was taken into consideration by officers when assessing the proposed GIA:

*“On balance, whilst slightly short of what may be sought for a unit over three floors, **heritage constraints prevent it from being extended** and so in this instance the proposed floorspace is considered acceptable.”*

- 5.12 Furthermore, the following excerpt is taken from paragraph 3.140 of the supporting text to Policy H6:

*“The Mayor’s Draft Interim Housing SPG advises that the nationally described space standard should be applied to all new dwellings, whether they are created through new-building, conversions or changes of use. **Where dwellings will be created from conversions or changes of use, the Council will apply the nationally described space standard flexibly taking into account the constraints arising from conversion of existing buildings, particularly Listed Buildings and other heritage assets.**”*

- 5.13 Officers should view the proposed floor-to-ceiling heights along the same lines. Taking the above into account, the proposed development is compliant with Policy H6 of the Local Plan.

#### *Natural Light*

- 5.14 At paragraph 4.5. officers state the following in their delegated report:

*“As a minimum, a dwelling should have at least one habitable room with a window facing within 30 degrees of south in order to make the most of solar gain through passive solar energy. There are south-west facing windows on the building; however these are 80 degrees of south and therefore would not comply. Due to heritage constraints; however, there is no scope to install additional windows.”*

- 5.15 Solar gain relates to passive heating from the sun through a window. As the flat would be sensitively furnished to the highest standards, it is not considered that solar gain would be required in ensuring a high standard of living for future occupants. Furthermore, solar gain is not mentioned within the Local Plan as a material planning consideration.

- 5.16 The report continues:

*“All habitable rooms should have access to natural daylight. Each floor and accordingly each room (living room, kitchen/dining and bedroom) would each be served by a south-west facing window which is considered to be of an insufficient size relative to the floor plan to enable each habitable room to received adequate daylight. In the absence of a daylight assessment to demonstrate how much internal daylight would be received, it is not clear whether the rooms would meet the ADF standards (1% bedrooms; 1.5% living rooms and 2% kitchen/dining).”*

- 5.17 Daylight/sunlight was not an issue raised by officers during the application, therefore a detailed assessment was neither sought nor submitted to officers. In response to the concerns now raised, the applicants have commissioned Brooke Vincent and Partners (BVP) to undertake a full assessment, submitted herewith (document ref: DS/RM/10801).



- 5.18 With regard to ADF, the report confirms that;
- the dining room at 3rd floor would achieve 1.28% ADF against the recommended value of 1.5%.
  - The living room at 4th floor would achieve 1.45% ADF, which is marginally below the recommended BRE value of 1.5%.
  - Finally, the bedroom at 5th floor would be significantly higher than the recommended value of 1% ADF.
- 5.19 The readings for the dining room and living room are respectively 85% and 96% the recommended value of 1.5% ADF which, BVP advise, would be defined as experiencing a negligible adverse daylight effect.
- 5.20 Considering the listed nature of the building and the impossibility of adding new openings, BVP consider the above represent very good results.
- 5.21 With regard to sunlight, all the habitable rooms would face within 90° of due south and this would satisfy the BRE recommendation. The results confirm that both the annual and winter sunlight availability would be above the recommended values of 25% and 5%.
- 5.22 In conclusion, the layout of the proposed accommodation ensures habitable rooms would receive the benefit of good daylight and sunlight, especially when considering the constraints imposed by the existing Grade II Listed building. Furthermore, it is worth noting that the BRE guidelines (paragraph 1.6) state that;

*“The Guide is intended for building designers and their clients, consultants and planning officials. The advice given here is not mandatory and this document should not be seen as an instrument of planning policy; it aims to help rather than constrain the designer. Although it gives numerical guidelines these should be interpreted flexibly since natural lighting is only one of many factors in site layout design”.*

#### *Outlook*

- 5.23 Officers quote Policy CP2, stating that *“new residential dwellings [must] be designed to achieve a good level of visual amenity”.*
- 5.24 Notwithstanding the constraints of this site, each level of accommodation benefits from a window with a south-west aspect, the fourth floor also accommodates an additional north east facing window. The property is dual aspect which even many new build flats fail to achieve. The property will also benefit from a roof terrace with, unparalleled 360 degree views over London. We consider that the concerns relating to outlook are without foundation.



VIEW FROM PROPOSED TERRACE

- 5.25 In consideration of the above points, we wholly disagree with the officer’s opinion regarding the quality of residential accommodation proposed.

5.26 At paragraph 6.6 of the officer’s delegated report, they state that the works ‘would alter the character of the space, transforming what is currently utilitarian brick to a domestic environment, which is at odds with the building’s intended function’.

5.27 The former fire station use has ceased. The building will not be used for that purpose again. The change of use of the remainder of the building has been accepted and approved. The former utilitarian/fire station environment is being changed to a domestic use (as per the images provided paragraph 3.6 above) but in a respectful manner.

5.28 Whilst it is acknowledged that the proposed flat is not conventional, that is part of the charm. We remain of the view that with the location and character of the host building, together with the high-quality fit-out (as manifest across the rest of the development), the proposed unit will offer future occupants with exceptional and characterful accommodation which pays due regard to its very special host building, compliant with Policy A1 of the Local Plan.



PROPOSED SECTION VISUALISATION

5.29 The second Reason for Refusal reads as follows:

*“The proposed development, in the absence of a legal agreement to secure car-free housing, would fail to promote healthy or sustainable transport choices, contrary to policy T2 of the Camden Local Plan 2017.”*

5.30 Had officers found the scheme to be acceptable in all other respects, we trust that officers would have requested the appellants to enter into a legal agreement with LB Camden, however this opportunity did not arise.

5.31 Accordingly, the appellants are now entering those discussions. A completed S106 will be submitted to the Planning Inspectorate to be secured to any forthcoming consent. The provision of this agreement will ensure that future occupants of the proposed unit will not be able to apply for a parking permit, thereby securing car-free housing and complying with Policy T2 of the Local Plan. The site comprises a sustainable location and sits within an established CPZ, the principle of car-free housing is therefore supported and encouraged.

5.32 The third Reason for Refusal reads as follows:

*“The proposed development, in the absence of a contribution to affordable housing, would fail to maximise the contribution of the site to the supply of affordable housing in the borough, contrary to policy H4 of the Camden Local Plan 2017.”*

5.33 As part of the above mentioned S106 legal agreement, an affordable housing contribution for the sum of £96,990 will be secured, should the Inspector allow this appeal.

**LISTED BUILDING CONSENT (LPA Ref: 2018/4910/L)**

- 5.34 The listed building application was refused for one reason which states:

*“The proposed demolitions and alterations, by reason of loss of historic fabric and plan-form, would cause harm to the special architectural and historic interest of the Grade-II\* listed building, contrary to policy D2 Heritage of the Camden Local Plan 2017.”*

- 5.35 At paragraph 6.2 of the officer report, they state:

*“The proposal would largely retain the external appearance of the fire station with the external alterations being confined to the removal of three chimney stacks and the installation of a balustrade behind the existing parapet to ensure the proposed terrace is compliant with Building Regulations.*

*The balustrade would measure 25cm and would be installed behind the parapet, with only 8cm exceeding the parapet height. **The external alterations would not be perceptible from ground level and therefore the character and appearance of the Belsize conservation area would be preserved.***

*Nevertheless, the demolition of the chimney stacks would constitute loss of historic fabric and is unacceptable in heritage terms.”*

- 5.36 In light of the comments above, it is clear that the focus of the concerns relates to the interior of the tower only, and the perceived harm caused through the removal of the chimney stacks and plan form. The officer’s report continues:

*“The proposed internal alterations are more invasive and would involve the removal of substantial historic fabric as well as changes to plan form. The tower has been designed to provide deliberately cramped access conditions and confined spaces at each level to aid employee training. At present, this unique plan form survives entirely intact, and its purpose-built historic use is therefore wholly legible.”*

- 5.37 The building was officially listed in 1974, and is described as follows:

*GV II\* Fire station 1912 - 5, by Charles Canning Windmill of the Fire Brigade Branch of the London County Council Architects Department.*

*MATERIALS: Brick with tile roof and tall brick chimney-stacks. Stone-clad appliance bay frontage and raised basement of the accommodation range. Tile-hung dormer windows, tile lintels and brick relieving arches to other windows. Decorative metalwork castellated hoppers and cresting along the gutters of the roof terrace and appliance bays.*

*PLAN: L-shaped with accommodation range to Eton Avenue and appliance room facing Lancaster Grove, large brick tower at the hinge for drills and hose-drying.*

*EXTERIOR: A clever interpretation of an Arts and Crafts-style house, adapted to meet the requirements of the fire brigade. The elevation to Eton Avenue could be mistaken for a terrace of cottages with its tall chimneys, casements with leaded lights, canted timber bays sitting just under the deep eaves, and ground-floor bay with moulded brick mullions and transoms. Its rear, facing the yard, is a more typical LCC design with deck-accessed fireman’s flats. The elevation to Lancaster Grove accommodates the three appliance bays, the most functional element of a fire station, in a similarly rustic design with a steeply pitched roof that flares at the low-hanging eaves*

*and tall hipped dormer windows. Also impressive is the monumental tower, which does not disrupt the domestic character despite its height and breadth; the segmental arched and lattice work recessed panels in the brickwork soften its bulk.*

*INTERIOR: The appliance room retains its original watch-room and cream glazed brick wall. Stairwell also has cream glazed bricks; stair with metal balustrade and sliding-pole chamber and doors survives intact; watch tower retains its iron spiral stair and hose-drying chamber. The first-floor single men's dormitory, now the gym, has an open truss roof and a second pole house which leads directly to the appliance room. Next to this room, the former single men's mess room, now the kitchen, has an original fireplace in russet glazed brick with overmantle inlaid with Delft-style tiles. The ground floor recreation room has the original panelling and fireplace. There are also numerous original fireplaces and timber doors in the accommodation sections of the station. Even to the detail of numbered pegs in the gear room, the survival of original features is notable.*

*HISTORY: Belsize Fire Station was constructed in 1912-5, at the end of the most creative period of design in the Fire Brigade Branch of the London County Council Architects' Department, during which the Brigade's most characterful buildings were built. Since 1896, new stations were designed by a group of architects led by Owen Fleming and Charles Canning Winmill, both formerly of the LCC Housing Department. They brought the avant-garde approach which had evolved for new social housing to the Fire Brigade Division, as the department was called from 1899. While some stations were built to standardised plans, others were highly experimental, sensitive to local context, and designed to a bespoke plan. The exemplars from the earliest years are Perry Vale, Euston, East Greenwich and West Hampstead. This is one of the last designs produced by the Department before the outbreak of WWI, yet (no doubt due to Windmill's authorship) it is more characteristic of the earlier stations in its distinctive architecture, attention to detail, and sensitivity to its setting. The station occupies a prominent site, on the apex of two roads lined with high-quality Edwardian houses and the sensitivity of the design to this context is marked. The generous plot size accommodates the fireman's flats in a separate two storey range and the view from the junction is strikingly picturesque.*

*The area had formerly been served by stations at St John's Wood (built 1870), Hampstead village (built 1874) and West Hampstead (built 1901); this station replaced that at St Johns Wood. The foundation stone for Belsize Fire Station records that the station was opened on the 22 May 1915 by Percy C Simmons, Chairman of the Fire Brigade Committee of the LCC.*

*SOURCES: Andrew Saint, London's Architecture and the London Fire Brigade, 1866-1938(Heinz Gallery RIBA, Exhibition Catalogue, 1981) Will Reading, L.C.C. Fire Stations, 1896-1916, their History, Condition and Future Use (Architectural Association, Graduate School, 2007) John B Nadal, London's Fire Stations (Huddersfield, 2006) Hampstead: Public*

*REASONS FOR DESIGNATION: Belsize Fire Station is designated at Grade II\* for the following principal reasons:*

*\*It is one of the most distinctive and original of a remarkable series of fire stations built by the LCC between 1896-1914, each executed to a bespoke design, which are widely admired as being among the most accomplished examples of LCC civic architecture of this rich and prolific period;*

*\*High architectural quality - as manifest in design, detail, materials and sensitivity to context;*

*\*It is also one of the most intact, having not been extended externally, and retaining its original timber appliance bay doors, plan form and numerous other features;*

*\*In the wider context of Edwardian architecture, this station is an exemplar of the use of a domestic idiom, the Arts and Crafts style, in a municipal building;*

*\*The building groups well with its neighbours in this area noted for its concentration of distinctive Arts and Crafts houses, including the many listed houses on Eton Avenue.*

- 5.38 As part of the planning and listed building applications, DLG Architects' Anthony Walker was instructed to advise on the proposed design and to provide a heritage assessment, submitted as part of the planning application. Anthony Walker is a Conservation Architect Accredited in Building Conservation and with a postgraduate Diploma in Building Conservation. He has been a Visiting Professor at Kingston University and he lectures on Building Conservation matters at the Architectural Association and at Cambridge University.

*Access/Stair*

- 5.39 The Heritage Statement acknowledges that the access to the proposed flat will be by means of a modified staircase but in the location of the existing stair and with a similar form. A small new staircase is provided to the top floor discretely, located in the corner at the end of the wardrobe to provide access to the roof. A hatch will be provided to allow access to the roof and a minimal safety rail will be provided fixed to the back of the parapet wall.

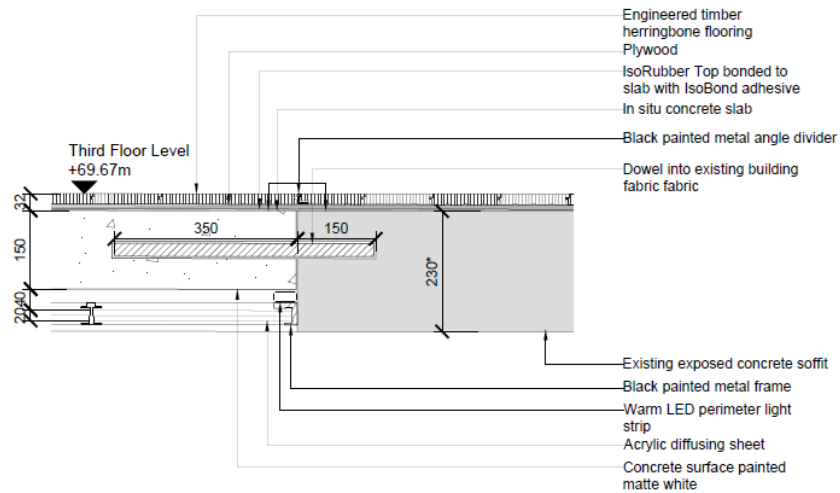
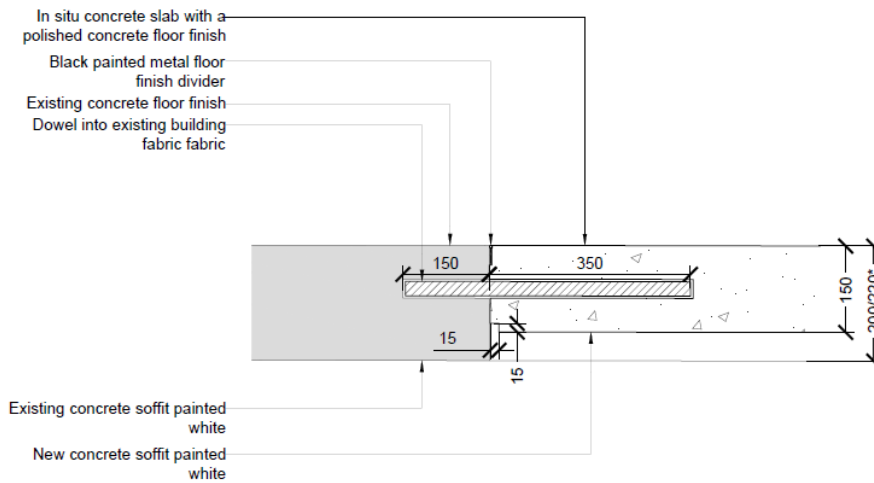


EXISTING THIRD FLOOR

- 5.40 In this regard, the principal form of the tower is retained. An enclosure is formed around the spiral staircase echoing the corner into which it is tucked at present.

*Central Opening*

- 5.41 With regard to the plan form involving the central opening/void no longer has a functional use (formerly used for hose drying). Accordingly, it is proposed to infill it with a reversible construction and provide a false back illuminated lay light to invoke the memory of the existing opening at second floor level, and with an inset metal trim on the floors above. The memory of the hose drying is also preserved through retention of the drain at ground floor, at the base of the tower.

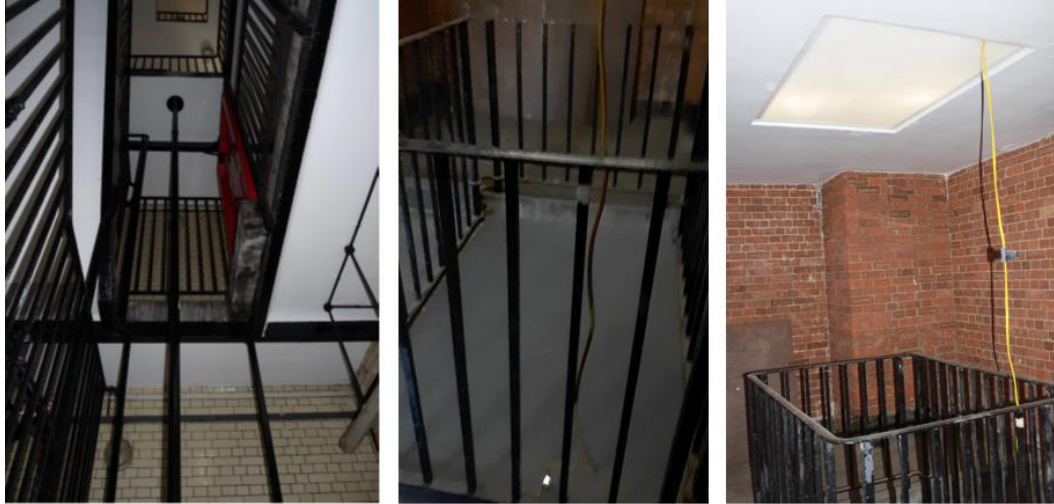


PROPOSED CENTRAL VOID WORKS DETAIL (DRAWING BFS THA PR AL 814 P1 EXTRACT)

5.42 Access to the proposed flat is by a new lobby on the second floor which has been introduced for fire safety reasons. This area leads to what at present are roof spaces for which consent has been granted to convert them to flats on either side of the main staircase. The nature of this area has been changed with the closure of the fire station the dominant element of the hanging hoses will have gone and the upper landing leading to roof storage will become the access to the approved flats.

5.43 Beyond the circular staircase and the central void, the interior of the tower is fairly non-descript, characterised largely by its lack of detail (exposed floor and walls). This unadorned finish is proposed to be carried over into the proposed accommodation.

- 5.44 With regard to the form of the tower, the access and the central laylight, this will be discrete and retain much of their present significance consistent with the residential use. Changes will only be evident to those gaining access to the space and for whom the history of its use can be made available in other forms.
- 5.45 The plans which accompany this application clearly show that the form of the tower is retained and there is no impact on the external appearance nor the character of the tower as a landmark in the Conservation Area.
- 5.46 Internally the overall space of the tower is retained and as described above the impact of the central opening is retained albeit in a different form.
- 5.47 The original form with hanging hoses has already been changed there being no current need for hanging space for hoses to drain down. Furthermore, there is physical, practical or strong heritage need for the chimney stacks to be retained.
- 5.48 The proposed layout with a corner circular staircase is retained and the new screen maintains the form of the existing short walls/nibs which are to be removed.
- 5.49 The internal alterations do constitute less than substantial harm and in accordance with paragraph 193 of the 2018 NPPF are a means of achieving a viable use of the building while retaining its historic and architectural interest.
- 5.50 In support of the above appraisal, we have regard to the recent appeal decision involving Rose Cottage, Vale of Heath (see Section 3 for further detail). In that decision the Inspector advised that;
- 5.51 ***“... The proposed works, through the retained ‘nibs’ containing the structural steelwork would still allow the pre-existing plan form to be read. Moreover, although the proposed works would result in a larger kitchen room, this would, due to its overall proportions, and the presence of a repositioned hearth, still retain a functional nature, in clear contrast to the more polite character of the principal rooms. Consequently, the proposed works would not erode the evidential significance of Rose Cottage to a degree that would fail to preserve the building or its special interest ... The proposed works would be part of this overall programme and would help to facilitate a more viable use for the property helping to secure its ongoing conservation - a matter to which I accord considerable weight in the overall balance.*”**
- 5.52 Officers continue in their report:
- “The proposal involves infilling the hose drop void and removing the associated iron railings and iron spiral staircase (and surrounding floor) in order to install a larger staircase to enable more comfortable circulation throughout the tower. To ensure compliance with fire safety regulations, steel-and-glass fire lobbies would be inserted on each floor.”*
- 5.53 Officers fail to mention that the proposed development would retain the “memory” of the central void through a change in floor finish and the use of backlit ceiling panels. These design measures would allow occupants and visitors to appreciate the former use of the tower; furthermore, the reversibility of this intervention should not be seen to constitute an unacceptable level of harm to the historic floorplan, especially in light of the considerate and sensitive approach adopted in the proposed design. The replacement spiral staircase would also retain the legibility of the historic floor plan.



LEFT: CENTRAL VOID AS ORIGINAL  
CENTRE: TEMPORARY INFILL  
RIGHT: CEILING INFILL BACKLIT MOCK-UP

5.54 The report continues:

*“To enable the installation of kitchen and bathroom servicing, it is proposed to dryline the north-eastern wall. This would alter the character of the space, transforming what is currently utilitarian brick to a domestic environment, which is at odds with the building’s intended function.”*

5.55 As stated previously in relation to Paragraph 195 of the NPPF, the tower will never again be used for its intended function. As stated in Paragraph 195, some harm to a heritage asset can sometimes be acceptable if *“the nature of the heritage asset prevents all reasonable uses of the site”*. Given the utilitarian appearance of the walls, and lack of any elaborate or exceptional detailing, the proposed drylining of this one wall should be seen as acceptable, especially when exposed brick would be retained for all other internal walls.



## 6.0 SUMMARY AND CONCLUSIONS

- 6.1 This statement accompanies an appeal against the decision of Camden Council to refuse planning permission and listed building consent for the conversion of the tower at the former Belsize Fire Station, to provide a 1-bed residential unit (LPA Refs: 2018/4394/P & 2018/4910/L).
- 6.2 Planning permission was granted last year (2016/0745/P, 2016/1128/L, 2016/5813/P, 2016/6119/L) for the change of use of former fire station (Sui Generis) to provide 18 self-contained residential units (Class C3) including replacement single storey side extension to east elevation and erection of two single storey side extensions to west elevation and insertion of roof dormers, with associated external alterations, landscaping and parking.
- 6.3 In accordance with the objectives of the NPPF, the proposed development would bring the tower back into a reasonable and viable use consistent with the rest of the site, ensuring its long-term viability.
- 6.4 The proposed conversion would not require any meaningful external alterations. Internal alterations are respectful and seek to retain the historic fabric and the plan form through a well-considered design prepared by Tate Harmer Architects.
- 6.5 Contrary to the comments of the Council, the proposed development would consolidate the residential use of the site while preserving the site's heritage value. The proposal is supported by a recent appeal decision at Rose Cottage.
- 6.6 In light of the significant findings of this statement, we respectfully request that this appeal is allowed.