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CADENT GAS LTD

125-139 BROADHURST GARDENS, CAMDEN, LONDON NW6 3BJ

DESIGN, ACCESS AND HERITAGE STATEMENT

APRIL 2021

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DESIGN, ACCESS AND HERITAGE STATEMENT

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APPENDICES

DRAWINGS

1 INTRODUCTION

1.1 This Design, Access and Heritage Statement has been prepared to accompany a retrospective application for full planning permission for the retention of external gas pipework installed to provide a new external mains gas supply to the individual units within 125-139 Broadhurst Gardens, NW6 3BJ (centred on NGR TQ 25792 84444).

1.2 125-139 Broadhurst Gardens comprises a large, late 19th Century apartment block constructed of red brick with eight individual flats over four storeys. The building is located within the South Hampstead Conservation Area, therefore, the works to its exterior have the potential to impact upon the character and appearance of the Conservation Area.

1.3 The installation of external gas pipework was undertaken following a release of gas from the previous supply. The previous gas supply was cut off and the pipework temporarily made safe before new external gas pipework was installed to reinstate a safe gas supply. The works were deemed urgently necessary by Cadent to ensure the safety and well-being of the occupiers given the time of year (February) in which the gas leak occurred with gas used to power heating and hot water and used for cooking.

1.4 The retention and reuse of the previous network pipework had been investigated by Cadent Gas Ltd prior to undertaking the new installation however, this was not possible due to the condition of the pipework.

1.5 This statement provides a description of the proposed works in terms of the amount, scale and appearance. In addition and in accordance with Para 189 of the NPPF, the statement also provides a proportionate assessment of the significance of the South Hampstead Conservation Area, in particular the contribution that 125-139 Broadhurst Gardens makes to its special character and appearance in order to determine the level of harm which may be experienced, if any, to its special character and appearance as a consequence of the works.

1.6 The assessment of potential impact to the significance of the Conservation Area is undertaken in accordance with terminology expressed within the National Planning Policy Framework (2019) and within Historic England good practice guidance presented in the *Setting of Heritage Assets (*Historic England GPA 3, 2017*)* and *Managing Significance in Decision-taking in the Historic Environment* (Historic England GPA 2, 2015) has been adhered to as appropriate.

2 SITE CONTEXT

2.1 Location and Access

2.1.1 The exact extent of the 'Site' of which this planning application relates to is illustrated on drawing CA12129-001 'Site Location Plan'.

2.1.2 125-139 Broadhurst Gardens is located with the jurisdiction of Camden Council, a borough within inner London. Furthermore, the building falls within the South Hampstead Conservation Area. For further information in respect of the surrounding area, please refer to Figure 1, below.

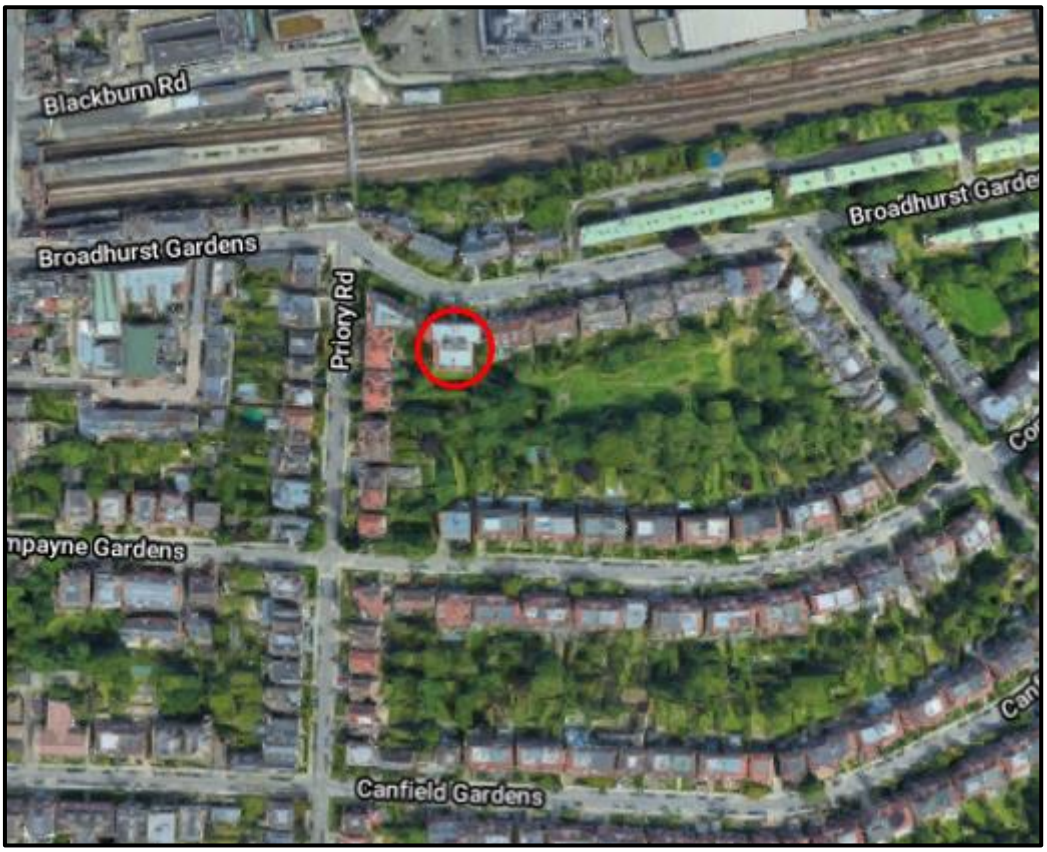

Figure 1: Satellite image of the area surrounding the application site courtesy of Google.com (location of application site is denoted by a red circle).

2.1.3 Figure 2, overleaf, identifies the boundary of the Conservation Area with the location of 125-139 Broadhurst Gardens identified in red. The site is located on the southern side of Broadhurst Gardens, a street positioned within the north of the Conservation Area.

2.1.4 The majority of the buildings within the Conservation Area including 125-139 Broadhurst Gardens are unlisted however, the property is considered to make a

positive contribution to the character and appearance of the Conservation Area. No listed buildings or other designated heritage assets are located in close proximity to the Site.

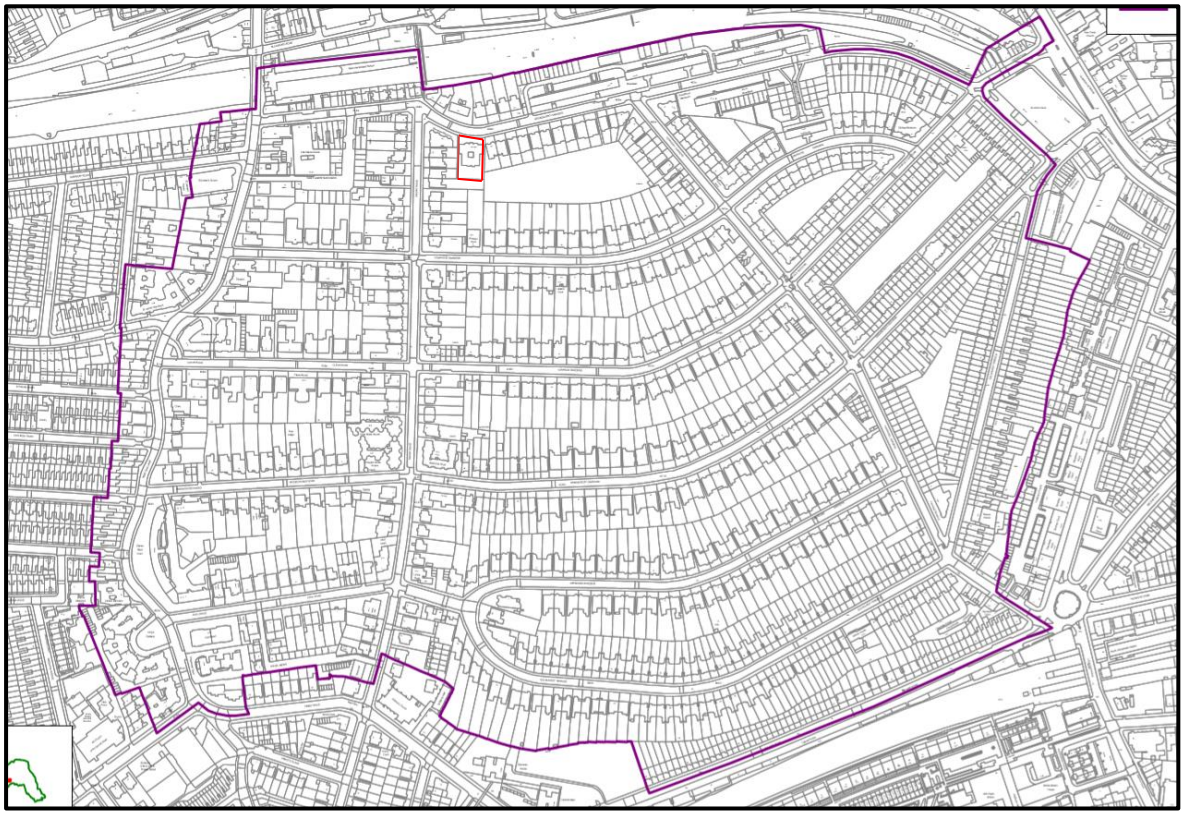

Figure 2: South Hampstead Conservation Area Map (Courtesy of Camden Council)

2.1.5 The nearest underground tube stations are West Hampstead which is located approximately 0.2 miles to the north west of the Site (3 minutes on foot) and Finchley Road located 0.4 miles to the east (7 minutes on foot).

2.1.6 In addition, there are several bus stops nearby including West Hampstead Station (Stop W) 0.2 miles to the north west (3 mins on foot) and West Hampstead Station Broadhurst Gardens (Stop A) 0.2miles to the west (4 mins on foot).

2.2 Land Use Context

2.2.1 The immediate area surrounding 125 -139 Broadhurst Gardens is residential in character comprising a mixture of houses, subdivided multi-occupancy properties and low-storey blocks of flats.

2.2.2 Within the area of the Site, commercial premises including florists, hotels and takeaways are interspersed. A greater number of commercial businesses can be found

further afield to the west on Kilburn High Road (A5) and to the east on Finchley Road (A41).

2.3 Site Features

2.3.1 125-139 Broadhurst Gardens comprises a late 19th Century detached, red brick, purpose-built apartment block. The property along with the neighbouring properties on the southern side of Broadhurst Gardens present a strong, cohesive architectural character to the street and have definite townscape value through their similarities in materials and design.

2.3.2 The building is of red brick construction laid in a Flemish bond with white cornices and decorative elements and a slate mansard roof with dormer windows at either end.

2.3.3 The central portion of the building projects forward providing the main focal point to the Broadhurst Gardens frontage. The building presents a symmetrical composition with a pair of triple storey canted bay windows separated by the communal entrance at ground floor level. The bays have one-over one sliding sashes to each floor whilst above the central entrance there are 3 no. six-over-one sash windows at first and second floor level and a 3 no. one-over one sash windows with a glass segmental decorative arch atop between third fourth floor levels. Centrally, at fourth floor level, the façade has been painted white, in contrast with the red brick above and below.

2.3.4 The outer flanks of the building are plainer in comparison with a recessed two window bay at ground, first and second floor levels and a decorative railed balcony to the first floor. The balcony is carried on large, moulded consoles.

2.3.5 The building is set back from the adjacent highway within neatly landscaped grounds enclosed behind a low, brick wall with access obtained through a central pathway leading to the ground floor communal entrance. Hedges are aligned within the landscaped area in parallel with the front boundary wall screening low level views towards the property from the public highway. Pathways leading to the rear of the building are located to each side of the building. Each pathway is accessed via a metal gate painted black.

2.3.6 The ground floor communal entrance is accessed via a large, white, rendered flat roof porch way which exhibits some minor red brickwork detailing with white banding and short Tuscan columns set at the outer corners. The communal entrance comprises double, timber panelled doors painted black with 4 no. solid panels at low level and 6 no. decorative glass panels above.

3 LEGISLATION AND PLANNING POLICY CONTEXT

3.1.1 A heritage asset is defined in the National Planning Policy Framework (NPPF) as 'A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest'(Ministry of Housing, Communities and Local Government 2019, Annex 2 page:67).

3.2 Legislation

3.2.1 Designated heritage assets protected by statutory legislation comprise Scheduled Monuments, Protected Wrecks, Listed Buildings and Conservation Areas.

3.2.2 Nationally significant archaeological sites, monuments and structures are protected under the Ancient Monuments and Archaeological Areas Act (1979).

3.2.3 Listed Buildings and Conservation Areas are protected under the Planning (Listed Building and Conservation Areas) Act (1990). In relation to development proposals within a Conservation Area, the legislation states that:

'*special attention shall be paid to the desirability of preserving or enhancing the character of that area'* (section 72).

3.3 National Policy

3.3.1 The National Planning Policy Framework (NPPF) supported by the National Planning Policy Guidance (PPG), which endorses the conservation and enhancement of the historic environment (Department for Communities and Local Government 2014), defines the role of the planning system as to promote and achieve sustainable development and involves 'protecting and enhancing our natural, built and historic environment' (MHCLG 2019, para:8).

3.3.2 In ensuring the statutory duty of the Planning (Listed Building and Conservation Areas) Act, the NPPF requires that in determining applications 'great weight' should be given to the asset's conservation and that 'substantial harm to or loss of… grade II listed buildings, or grade II registered parks or gardens, should be exceptional' whilst 'substantial harm to or loss of…assets of the highest significance, notably Scheduled Monuments, protected wreck sites, registered battlefields, Grade I and II* listed buildings, Grade I and II* Registered Parks And Gardens, and World Heritage Sites, should be wholly exceptional' (MHCLG 2019, para:194).

3.3.3 The significance of a heritage asset (designated or non-designated) is defined within the National Planning Policy Framework (NPPF) as 'the value of a heritage asset to this and future generations because of its heritage interest. This interest may be archaeological, architectural, artistic or historic' (MHCLG 2019, Annex 2 page:71).

3.3.4 The setting of a heritage asset (designated or non-designated) is defined as 'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.' (MHCLG 2019, Annex 2 page:71).

3.3.5 Where heritage assets (designated or non-designated) are to be affected by development, 'local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance' (MHCLG 2019, para:189).

3.3.6 Developments where substantial harm to or total loss of significance of a designated heritage asset should be assessed against specific tests and should deliver substantial public benefits which outweigh any loss or harm (MHCLG 2019, para:195). Less than substantial harm to a designated asset would require public benefits including the securement of an optimum viable use (MHCLG 2019, para:196).

3.4 Local Planning Policy

3.4.1 Local plan policy comprises the following:

- Camden Local Plan (adopted 2017).

3.4.2 Relevant policies comprise D1: Design and D2: Heritage which are quoted below:

Policy D1 Design

The Council will seek to secure high quality design in development. The Council will require that development:

a. respects local context and character;
b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;

d. *is of sustainable and durable construction and adaptable to different activities and land uses;*
e. *comprises details and materials that are of high quality and complement the local character;*
f. *integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;*
g. *is inclusive and accessible for all;*
h. *promotes health;*
i. *is secure and designed to minimise crime and antisocial behaviour;*
j. *responds to natural features and preserves gardens and other open space;*
k. *incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,*
l. *incorporates outdoor amenity space;*
m. *preserves strategic and local views;*
n. *for housing, provides a high standard of accommodation; and*
o. *carefully integrates building services equipment. The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.*

Policy D2 Heritage

The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

Designated heritage assets: Designed heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

a. the nature of the heritage asset prevents all reasonable uses of the site;

b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;

c. conservation by grant-funding or some form of charitable or public ownership is

demonstrably not possible; and

d. the harm or loss is outweighed by the benefit of bringing the site back into use.

The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

Conservation areas

Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.

The Council will:

e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;

f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;

g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and

h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.

3.4.3 In addition to the local plan, the London Plan (2021), which provides the strategic framework for development and land-use in London, is also applicable. Relevant policies include policies HC1 and D12 which are replicated in part below:

London Plan Policy HC1 – Heritage Conservation and Growth

Planning decisions

C. Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development

proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

London Plan Policy D12 Fire Safety

In the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they:

2) are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures

3) are constructed in an appropriate way to minimise the risk of fire spread

4 REASONING BEHIND THE WORKS

4.1 Need for the works

4.1.1 The installation of gas pipe apparatus to the east and west side elevations were reactive following a reported gas leak to the network that previously supplied gas to units 125-139 within the building. The gas supply to the units was subsequently terminated on a temporary basis and the below ground supply made safe. Gas to the affected units is used to power heating, hot water and cooking appliances.

4.1.2 Given the time of year in which the leak occurred (February 2021) the works were considered urgently necessary in the interest of both the safety and health of the occupiers affected helping to ensure the building remains fit for 21st Century living.

4.1.3 This urgent requirement to re-establish a safe and compliant gas supply to these units and the limited extent of new installation to the principal frontage of the property which contributes most to the character and appearance of the Conservation Area is the primary justification for Cadent Gas having undertaken the works in advance of consent.

4.1.4 The leak was likely due to corrosion of the pipework. Whilst it is expected that the installed steel gas supply network pipes would have a minimum asset life-expectancy of 50yrs this was originally based on the assumption that their operating conditions were conducive to maintaining an optimum stable environment where external aspects such as moisture did not have a detrimental effect on the carbon steel pipes.

4.1.5 Much degradation of an existing gas network is caused by air-borne moisture condensing on the unprotected pipe at areas such as screw-threaded joint lip interfaces and/or inter-floor areas where concrete has been used to seal the annulus between the pipe and the floor and water pools around the pipe.

4.2 Technical Design Considerations

4.2.1 In designing gas schemes Cadent Gas Ltd has adopted *IGEM/G/5 Edition 2 For Multi-Occupancy Buildings Engineering Requirements* as their design and construction standard. The implications of this adoption on the current practices of Cadent Gas Ltd are that all future riser systems installed as new or as a replacement on multi-occupancy buildings shall be designed according to the requirements laid out in IGEM/G/5. Importantly the Institution of Gas Engineers and Managers (IGEM) would

expect adoption of IGEM/G/5 by a Gas Transporter in its entirety to ensure best practice from lessons learned are applied.

4.2.2 In addition to IGEM/G/5 Cadent utilize multiple documentation to comply and maintain the standards needed to facilitate these types of works. Key documents used to inform the design of the pipework and meter box installations are listed below:

- Gas Safety (Installation and Use) Regulations
- Pipeline Safety Regulations
- Building Regulations (More specifically part B)
- Dangerous Substances and explosive atmosphere regulations (DSEAR)
- Regulatory Reform (Fire Safety) Order

4.2.3 As required by IGEM/G/5, Cadent in their approach to designing new and replacement gas scheme must assess the risk of different design options with the most suitable design solutions either eliminating or removing potential hazards to residents. Different installation design options result in different hazards and potentially different levels of risk and a systematic approach is required to minimize the risk.

4.2.4 The known hazard to be addressed (eliminated or removed) by a design is a potential release of gas as a result of the failure of a pipe, fitting or joint which could lead to an uncontrolled gas release which, on ignition, results in a fire.

4.2.5 More serious, is the potential release of gas into a confined space within a building space or compartment in a quantity capable of forming a flammable mixture which on ignition leads to an explosion resulting in damaging overpressures.

4.2.6 Design solutions explored by Cadent and sought by IGEM/G/5 therefore seek to firstly prevent failure of the pipework through the use of appropriate materials, methods and fixing for installations and apparatus, and secondly, prevent the containment of a gas leak through ensuring new works are appropriately positioned to allow ventilation and access for maintenance and regular inspection.

4.2.7 Appendix A3.4.4 – Risk Assessment of IGEM/G/5 establishes a hierarchy of risk in multi-occupancy buildings as they concentrate larger numbers of residents who can be affected by the known hazard (gas leak), and, depending on the type of construction, an incident can cause significant damage beyond the source. Catastrophic failure of the gas supply to or within a multi-occupancy building is,

defined as a more serious failure than would normally be expected during the life of the installation, from whatever cause, and is perceived to be a greater risk than for traditional housing. It is clearly the case that the gas supply in a multi-occupancy building is a greater societal risk, and it is societal risk which is more of a driver for gas safety.

4.2.8 General guidance within Appendix A3.4.4 provides the following hierarchy of the risk level at specific locations within multi-occupancy buildings. Locations considered to be at 'greater risk' of the known hazard (gas leak, ignition) and which design solutions should avoid based on best practice and lesson learned include the following: -

- Where a meter installation is accessible and a release can enter a confined inhabited space, e.g. internal meter, meter in common entrance area.
- Installations with internal risers with the gas installation on the 'inside' of the property, e.g. internal kitchens. A release could be into a confined space with limited natural ventilation and venting only into another room.
- Properties where an explosion can affect several dwellings or affect the escape route(s). This will depend on the method of construction of the property.

4.2.9 Locations considered to be at 'lower risk' from the known hazard and which design solutions have full regard towards in terms of reducing and eliminating risk to occupiers based on best practice and lessons learned include the following: -

- Where a release from a meter installation cannot enter a confined 'inhabited' space e.g. from an external meter box or a remote meter room i.e. the structure of the flats is not at risk from a gas escape.
- Low rise properties of similar construction to normal housing where the hazard and risk would be the same as for normal housing.
- Installations with external risers with the gas installation confined to rooms with an outside wall and window(s). The installation inside the property is limited and is in a location where the effects of an incident would be limited.

4.2.10 In full consideration and application of this guidance including best practice from lessons learned, Cadent have installed a scheme to renew the gas supply network to the units within 125-139 Broadhurst Gardens providing a new in ground supply from the parent main which then emerges at the base of a west and east side elevation of the block.

4.2.11 The installed works represent the most desirable design solution to reduce or eliminate risk of the effects of a future gas release to the occupiers of the building whilst reducing the extent of external pipework necessary to exterior of the building in view of conserving the character and appearance of the Conservation Area and sustaining the positive contribution made by 125-139 Broadhurst Gardens to this.

4.3 Planning Synopsis

4.3.1 It is appreciated that the regulations presented in this section are covered under a separate regulatory regime. Whilst we fully appreciate that it is not the role of the planning system to duplicate controls under another regulatory regime, a distinction needs to be made between this and the clear policy direction given by the recently updated London Plan – in particular policy D12 which relates to Fire Safety.

4.3.2 We would therefore invite the decision maker to place significant material weight on the measures proposed to satisfy this policy and in doing so ensuring that the property can benefit from the highest standards of fire safety.

5 DESIGN APPROACH & DESCRIPTION OF THE WORKS

5.1.1 This section provides a description of the works for which retrospective planning permission is sought. The works primarily involve the installation of external gas pipe apparatus to the east and west (side) facing elevations of 125-139 Broadhurst Gardens.

5.1.2 By way of concise summary, the works entail 2 no. new subterranean gas connections from the existing gas mains beneath Broadhurst Gardens and installation of 2 no. vertical gas risers which then support 4 no. lateral (horizontal) gas pipes.

5.1.3 The adopted design approach for the installations was developed to keep the extent of new external pipework away from the principal north (front) facing elevation and to keep installations to a minimum whilst complying with the relevant industry standards and regulations.

5.1.4 The full extent of the necessary pipe installations is shown on drawing refs. CA12129-002 to CA12129-005.

5.1.5 Each element of the works is discussed in turn below.

5.2 Extent of new subterranean gas pipework

5.2.1 To reinstate a safe gas supply to 125-139 Broadhurst Gardens, 2 no. new subterranean gas pipe connections derive from the existing gas mains located beneath the highway. Both new subterranean connections travel southwards towards the north (front) facing elevation of the building where they emerge above ground level vertically; 1 no. gas pipe emerges above ground on the eastern corner of north front elevation and 1 no. gas pipe emerges above ground at the western corner of the north elevation.

5.2.2 Originally, the supplies emerging above ground on the north (front) elevation, were proposed to emerge on the west (side) facing elevation of the building, however, due to the identification of subterranean drainage systems in these areas, the installation of subterranean gas pipework could not be implemented as intended. The north (front) facing elevation was the closest point at which the subterranean supplies could emerge to facilitate a new supply to the secondary, side elevations of the building.

5.2.3 Planning permission is not required for the new subterranean gas connections with this element being permitted development under Part 15, Class A, Section A (a) of the Town and Country (General Permitted Development) Order. The route of the new subterranean pipework is indicated on the proposals for contextual purposes.

5.2.4 For further information in respect of this part of the proposals, please refer to drawing refs. CA12129-003 and CA12129-005.

5.3 **Extent of new installations to the north (front) facing elevation**

5.3.1 2 no. new subterranean gas risers emerge above ground on the north (front) facing elevation of the building at low level. At the western corner the vertical 1" threaded steel pipe travels vertically for 0.5m remaining at low level. At this point, the pipe turns perpendicular and continues horizontally, wrapping around the corner of the building, through a gap between the wall and the metal gate, on to the west facing (side) elevation.

5.3.2 At the eastern corner the installations presents a mirrored arrangement with a vertical 1" threaded steel pipe travelling vertically for 0.5m remaining at low level before turning perpendicular and continuing horizontally, wrapping around the corner of the building, through a gap between the wall and the metal gate, on to the east facing (side) elevation.

5.3.3 As part of the original proposals, the vertical gas pipes at the eastern and western corners were intended to travel vertically up the north facing elevation for approximately 2.5m, wrapping around the white cornice and continuing up and over the gates leading to the rear of the building. To keep the pipework to the north facing elevation to an absolute minimum and to avoid interference with any key architectural features of the building, the installation design has been revised as per the description above with the vertical extent of the pipework not exceeding 0.5 metres above ground level.

5.3.4 For further information in respect of this part of the proposals, please refer to drawing refs. CA12129-003 and CA12129-005.

5.4 **Extent of new installations to the west (side) facing elevation**

5.4.1 After entering through the space gate between the gate and western wall of the building, the horizontal gas pipe which continues from the north (front) elevation resumes a vertical direction for 1m so the pipework is aligned level with the height of the terminated cornice. At this point the vertical pipe turns 90 degrees and continues horizontally for 3m aligned with the existing cabling present to the elevation.

5.4.2 The 3m horizontal pipe connects to the new vertical gas riser which extends for 8.5m to third floor level. The new vertical riser supports 4 no. 1"lateral connections which

extend southwards for 2m at each storey before entering through the fabric of the building connection directly to the internal gas meter boxes within flats 127, 131, 135 and 139 providing a new safe gas supply.

5.4.3 Once the pipework has entered through the fabric of the building it connects directly to an internal gas meter box.

5.4.4 For further information in respect of this part of the proposals, please refer to drawing refs. CA12129-003 and CA12129-005.

5.5 **Extent of new installations to the east (side) facing elevation**

5.5.1 As the gas pipe continues through the space gate between the gate and eastern wall of the building, the horizontal gas pipe resumes a vertical direction for 8.5m so the pipework is aligned level with the height of the terminated cornice. At this point the vertical pipe turns 90 degrees and continues horizontally for 3m aligned with the existing cabling present to the elevation.

5.5.2 The 3m horizontal pipe connects to the new vertical gas riser which extends for 9m to third floor level. The new vertical riser supports 4 no. 1" lateral connections which extend southwards for 2m at each storey before entering through the fabric of the building connection directly to the internal gas meter boxes within flats 125, 129, 133 and 137 providing a new safe gas supply.

5.5.3 Once the pipework has entered through the fabric of the building it connects directly to an internal gas meter box.

5.6 **External Finishes and Appearance**

5.6.1 To further minimise the appearance of the works to the building and the wider character and appearance of the Conservation Area, appropriate coloured finishes to the external pipework has been applied with a black painted applied to match the existing utility services and down pipes already found on the east and west (side) facing elevations.

5.6.2 Similarly, the means of attaching the pipework to the building has sought to be minimal with the method of fixing involving the drilling of holes to accommodate fixing brackets into the building fabric. Similar to the pipework, the brackets and clips have received a matching coloured finish according to their location on the property. Any such screw holes and the supporting apparatus are intended to be permanent impacts

insofar as the pipework will remain in situ, but can easily be removed if necessary, with the holes filled in sympathetically.

5.7 Access

5.7.1 The proposed works would have no impact on existing access arrangements to, from or through the building.

6 ASSESSMENT OF SIGNIFICANCE

6.1.1 The significance of a heritage asset is defined within the National Planning Policy Framework (NPPF) as 'the value of a heritage asset to this and future generations because of its heritage interest'. This interest as specified below may be archaeological, architectural, artistic or historic. Significance derives not only from the physical fabric of a heritage asset but also from its setting' (MHCLG 2019:56). At discretion terminology used in Historic England's *Conservation Principles, Policies and Guidance* (2008) will be quoted.

6.1.2 The NPPF stipulates that a description of the significance of each heritage asset potentially affected by a proposed development should be provided to satisfy the requirements of the NPPF.

6.1.3 The asset affected by the works in this instance is South Hampstead Conservation Area.

6.1.4 An assessment of the heritage interest of South Hampstead Conservation Area is presented below including discussion of the contribution of 125-139 Broadhurst Gardens to the special character and appearance of the Conservation Area. The assessment is provided in proportion with the value of the asset and the scale of the works as far as is necessary to determine any potential effect of the works on significance.

6.2 Historic Interest

6.2.1 South Hampstead was developed on the southern slopes of the medieval manor of Hampstead. Although the area remained as undeveloped meadow or farm until the 19th Century, it is possible to identify how the original ownership of the land shaped street patterns of the area as South Hampstead was originally split between two medieval manors.

6.2.2 The central section of the area belonged to the manor of Hampstead. However, by the 12th Century, the manor had been split and in the middle ages the Manor of Hampstead had a village with a parish church. Following the dissolution of the monasteries by Henry VIII the ownership of the manor changed several times and landed in the hands of the Maryon Wilson family.

6.2.3 Following the opening of Finchley Road in 1826, Maryon Wilson was keen to develop the specified lands and amend the tenancies, however, public outcry particularly

about the latter from Londoners who used the area for recreation led to the creation of the first local amenity groups in the country – Hampstead Heath Protection Fund Committee now known as Heath and Hampstead Society which hindered the development of the site.

6.2.4 Development in the area finally commenced in 1874, when Priory Road (previously Canfield Road) was opened providing a gateway to the western side of the estate. In the late 1870's development commenced in earnest of Maryon Wilson's demesne lands and the streets that now make up the conservation area comprised the first major development in the south western section of their estate. Roads were named after Maryon Wilson estates in Essex and Sussex.

6.2.5 Bomb damage during WWII resulted in a number of flats being constructed on Broadhurst Gardens alongside the railway in 1956.

6.3 Architectural Interest

6.3.1 South Hampstead is a well-preserved example of a leafy Victorian suburb, almost exclusively residential in nature, and largely homogeneous in scale and character. The area is characterised by large, semi-detached and terraced late-Victorian properties, in red or gault brick, with particularly distinctive and attractive roofscape including turrets, gables and tall chimneys.

6.3.2 Houses are made special by a variety of decorative treatments including terracotta panels and brickwork ornamentation, tiled and patterned footpaths, delicate iron work and elaborate timber doors and windows including some original stained and leaded glass.

6.3.3 One of the most prominent features of the Conservation Area is vegetation – both to the front and rear of properties. Green front gardens demarcated by low or ornate garden walls topped with hedges contribute strongly to the area's character. Building lines of the residential streets are generally set-back from the pavement which, with the boundary landscape treatment and many mature trees, are essential in giving the streetscape it's attractive serene quality.

6.4 Summary

6.4.1 125-139 Broadhurst Gardens contributes positively to the character and appearance of the Conservation Area. This positive contribution arises from the architectural form, scale and decoration of the building which retains original detailing and architectural

decoration particularly to the front elevation. The property retains its architectural form as a late 19th Century purpose-built apartment block with similar characteristics as the surrounding properties which adds to the general historic character and sense of place of this part of the Conservation Area.

6.4.2 In addition, the building has historic interest as part of a group of residential properties representative of the expansion residential development in the area in the late 19th Century.

7 ASSESSMENT OF IMPACT

7.1.1 The NPPF stipulates two levels of potential impact to designated heritage assets. The NPPF references these as:

- Substantial harm; and
- Less than substantial harm.

7.1.2 Planning Practice Guidance (PPG) (Revised 2019) discusses how to assess substantial harm where it states '*In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting'* (Para 19).

7.1.3 The application of the terms 'less than substantial' and 'substantial' is made on professional judgement and experience. The level of impact expressed by this assessment will be either no harm, less than substantial harm or substantial harm.

7.1.4 The new installations to the building have been carefully considered in respect to the applicable Gas Industry Standards and to minimise the extent of pipework necessary to serve each unit.

7.1.5 In respect to the Conservation Area, the works to the building have been designed to:

- be the minimum extent necessary to provide a safe and compliant gas supply to the occupiers of the flats within 125-139 Broadhurst Gardens;
- have a black coloured finish to reflect the finish of the downpipes and other existing utility services on the east and west facing elevations;
- be aligned wherever possible with existing vertical installation including cabling and down pipes;
- Keeping the installations to the principal street facing elevation, which displays a greater architectural quality and which contributes more to the character and appearance of the Conservation Area in terms of interaction with the street and aesthetic quality, to an absolute minimum;
- be reversible and easily removed in the future if necessary.

7.1.6 125-139 Broadhurst Gardens is a late 19th Century building which is identified within the Conservation Area Character Appraisal and Management Plan as being positive in its contribution to the character and appearance of the area.

7.1.7 Impacts to the character and appearance of the Conservation Area are considered to be neutral with the majority of the works installed on the side facing secondary elevations preventing the new pipework being visible from the street scene.

7.1.8 Due to the identification of a subterranean drainage system underneath the eastern and western pathways leading to the rear of the building, it was necessary to install a short sections of vertical pipework to the north (front) facing elevation of the building. The short sections of pipework are not visible when looking directly at the building as they are screened by the landscaping of the front garden and the low-level wall which encloses the front garden.

7.1.9 The majority of the installations are limited to the private walkways to the east and west of the building that lead to the rear building. The works from this location are viewed in the context of existing service installations. The coloured finish applied to the pipework and fixings further helps to integrate the installations on the elevation replicating existing finishes of existing utility services.

7.1.10 The installations to the side elevation are not visible within key views through the Conservation Area along Broadhurst Gardens. Furthermore, the installations to the front elevation and the side elevations do not affect the appreciation of the aesthetic intention of the building nor do they interfere with any key architectural details which reveal the buildings historic and architectural interests.

7.1.11 Having considered the contribution of 125-139 Broadhurst Gardens to the character and appearance of South Hampstead Conservation Area and the extent of the works including the position and finish of the pipework, it is considered that no harm will result to the character and appearance of the Conservation Area as a consequence of the installations. This is based on the following grounds:

- The installations would not affect the key elements and features of the building which contribute most explicitly to the character and appearance of the Conservation Area with the majority of the pipework installed to the east and west (side) facing elevations of the building avoiding interference with or distraction from the key architectural detailing presented by the building;

- The installations to the north (front) facing, east and west (side) facing elevations would not be visible within key views through the Conservation Area along Broadhurst Gardens and towards the property which reveal its architectural interest with the position of the installations on a secondary, side elevation conserving the appearance of the front elevation of the property and it's positive contribution to the streetscape;
- The installations to the north (front) facing elevation have been kept to the absolute minimum required and do not permanently interfere with any key architectural features or interfere with the historic or architecture appreciation of the building;
- The proposed additions would not affect the experience of the building as a late 19th Century purpose-built apartment block which adds to the historic interest and character of the Conservation Area.

8 CONCLUSIONS

8.1.1 Wardell Armstrong LLP has been instructed by Cadent Gas Ltd to submit a retrospective planning application for the installation of external gas pipe apparatus to the exterior of 125-139 Broadhurst Gardens, NW6 3BJ.

8.1.2 The installation of external gas pipework has been undertaken following a release of gas from the previous supply. The previous gas supply was temporarily cut off and the pipework made safe and a new gas pipe apparatus comprising 2 no. external gas risers were installed to reinstate a safe gas supply to the residents. The works were deemed urgently necessary by Cadent to ensure the safety and well-being of residents in particular given the time of year in which the gas leak occurred.

8.1.3 125-139 Broadhurst Gardens is located within the South Hampstead Conservation Area. This assessment, undertaken with due respect to guidance published by Historic England and with the utilisation of terminology in full accordance with the National Planning Policy Framework, has assessed the potential impact of the proposals on the significance of Conservation Area.

8.1.4 125-139 Broadhurst Gardens is of importance to the Conservation Area contributing to its character and appearance through its architectural form, scale, use and its position as a late 19th Century purpose-built apartment block that expresses the historic and architectural interest of the area as a leafy Victorian suburb which displays a coherent architectural language, scale and rhythm.

8.1.5 The works undertaken at 125-139 Broadhurst Gardens would not upset the scale, proportions or its architectural integrity and its positive contribution to the character and appearance of South Hampstead Conservation Area would be preserved.

8.1.6 In application of the NPPF, the proposed works which are minor in their extent result in no harm to the significance of South Hampstead Conservation Area with its special character and appearance is preserved. In this respect the works also comply with Policy D2 of the Camden Local Plan and HC2 of the London Plan which seek to preserve significance.

9 GLOSSARY

Archaeological Interest

There will be archaeological interest in a heritage asset if it holds, or potentially may hold, evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them

Source: Historic England Conservation Principles 2017 (consultation draft)

Architectural Interest

The properties of a place resulting from and revealing the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types

Source: Historic England Conservation Principles 2017 (consultation draft)

Artistic Interest

The influence of human imagination and skill to convey meaning through all forms of creative expression on the physical properties of a place and its setting or on their associations and appreciation. Artistic interest may relate to the influence of a place on art as well as the use of skill and design embodied in its fabric

Source: Historic England Conservation Principles 2017 (consultation draft)

Harm

Changes for the worse, here primarily referring to the effect of inappropriate interventions on the heritage interest of a place that reduces their values to society

Source: Historic England Conservation Principles 2017 (consultation draft)

Historic Interest

The connections between a place and past lives and events

Source: Historic England Conservation Principles 2017 (consultation draft)

Significance

The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting

Source: NPPF 2019

Setting of a heritage asset

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral

Source: NPPF 2019

APPENDICES

APPENDIX 1

Plates

Plate 1 – North (front) facing elevation of 125-139 Broadhurst Gardens. Please note the low level wall and landscaped front garden which provide screening opportunities for low level installations on the elevation. (Image courtesy of Google.com)

Appendix 2

Photos of Completed Works (courtesy of Cadent Gas Ltd)

Plate 1 – Photo of completed installation to the east (side) facing elevation. Please note the same extent of installation is mirrored on the west facing elevation.

Plate 2 – Photo of completed installation to the eastern corner of the north (front) facing elevation. Please note the same extent of installation is mirrored at the western corner of the north (front) facing elevation.

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