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CADENT GAS LTD

FALMER HOUSE, 35 BELSIZE PARK, CAMDEN

DESIGN AND HERITAGE STATEMENT

MARCH 2022

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DESIGN AND HERITAGE STATEMENT

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CONTENTS

1 INTRODUCTION

1.1.1 This Design and Heritage Statement has been prepared as part of a full planning application for the installation of external gas pipework (in retrospect) to restore the existing gas supply at Falmer House, 35 Belsize Park, London, NW3 4DY.

1.1.2 Falmer House comprises an early to mid-20th Century block of flats within the jurisdiction of the London Borough of Camden. The building is located within Belsize Conservation Area, a designated heritage asset, therefore, the works to its exterior have the potential to impact upon the character and appearance of the conservation area.

1.1.3 The installation of the gas network forms part of Cadent Gas' reactive works where the gas supply has been restored to the affected units within the building following a reported gas leak. Cadent were required to terminate the gas supply serving the affected units to maintain the safety of the residents. Gas is utilised by residents for cooking, heating and hot water, therefore, restoring the gas supply was considered a matter of urgency to safeguard the wellbeing of the residents. Cadent Gas are therefore seeking planning permission retrospectively for the required restoration works.

1.1.4 This statement provides a description of the works in terms of the amount, scale and appearance. In addition, and in accordance with Para 194 of the NPPF, the statement also provides a proportionate assessment of the significance of Belsize Conservation Area, in particular the contribution that 35 Belsize Park 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 undertaken.

1.1.5 The assessment of potential impact to the significance of Belsize Conservation Area is undertaken in accordance with terminology expressed within the National Planning Policy Framework (2021). Historic England good practice guidance presented in *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

2.1.1 Falmer House, 35 Belsize Park is located within the jurisdiction of the London Borough of Camden. The building is located on the west side of Belsize Park, with the entrance frontage facing south east towards the road.

2.1.2 Belsize Park is orientated on a north east to south west axis and is made up of mostly residential buildings. Most of the properties within Belsize Park comprise mid-19th Century villas.

2.1.3 For completeness the approximate location of Falmer House (the Site) is denoted in red on Figure 1, below.

Figure 1: Satellite image identifying the location of 35 Belsize Park. (courtesy of Google.com)

2.1.4 The exact extent of the 'Site' to which this planning application relates is illustrated on drawing CA12446-001 'Site Location Plan'.

2.1.5 Falmer House is located within Belsize Conservation Area, a designated heritage asset. The Belsize Conservation Area is sited on the rising land between Chalk Farm at the bottom of Haverstock Hill and Hampstead at the top and extends westwards to Swiss Cottage. The character of the conservation area is defined by the relationship of the streets and houses to the contours of the hills.

2.1.6 Figure 2 identifies the boundary of Belsize Conservation Area with the location of Falmer House identified by a red circle.

Figure 2: Belsize Conservation Area Map (Courtesy of London Borough of Camden)

2.1.7 The nearest designated heritage assets within the vicinity of Falmer House and also within the conservation area boundary includes the Grade II listed Church of St Peter (NHLE Ref: 1244562) located approximately 64m to the north east of the Site.

2.1.8 Due to the nature of the works undertaken which comprise minor external installations, and the distance and screening between the Site and the nearby listed building no harm to its significance is judged to result as a consequence of the proposals; the works not affecting any elements of the setting of the Church of St Peter which would affect an appreciation of its significance.

2.2 Land Use Context

2.2.1 The predominant land use surrounding the Site is residential with many of the buildings comprising houses which have since been converted into multi-occupancy buildings.

2.3 Site Features

2.3.1 Falmer House, 35 Belsize Park comprises an early to mid-20th Century building of loose Neo-Georgian style and appears from historic mapping to have replaced an earlier villa which adjoined number 34 to form a symmetrical pair and which would have likely replicated the composition of the adjacent and opposing paired villas which characterise the streetscape. The building extends to five storeys in height and is

attached to Merton House, number 36, to the southwest. Merton House is a larger but contemporary block of flats which adjoins the earlier classically styled number 34 to the northeast.

2.3.2 Falmer House and Merton House form a prominent frontage overlooking Belsize Park. The buildings are linked by a brickwork wall which has a large round arch opening extending from first floor level to fourth floor level. The buildings share the same architectural language with channelled stone blockwork walls and canted bay windows to the ground floor and iron railed balconies, which mimic the canted bay above. The upper floors are of buff/stock brick construction laid in a Flemish bond. The flat roof is concealed by a redbrick parapet.

2.3.3 Only Falmer House is subject to the proposal within this application, therefore, only Falmer House will be described further in this section.

2.3.4 The building is accessed via a pair of timber doors with single large panes of glass and a large modern, rectangular fan light above. The front garden to the building is gated and enclosed by a small hedge. The majority of the windows on the building frontage comprise modern UPVC replacements with small multi-panes however a vertically sliding sash windows remains to the fourth floor. Windows closest to the northern edge of the building are set in a moulded stone surround with keystone to the first floor.

2.3.5 A narrow external walkway is located between the Merton and Falmer Houses to provide access to the rear of the building. Evidence of existing utility services such as pipework and cable can be observed on the south west facing (side) elevation.

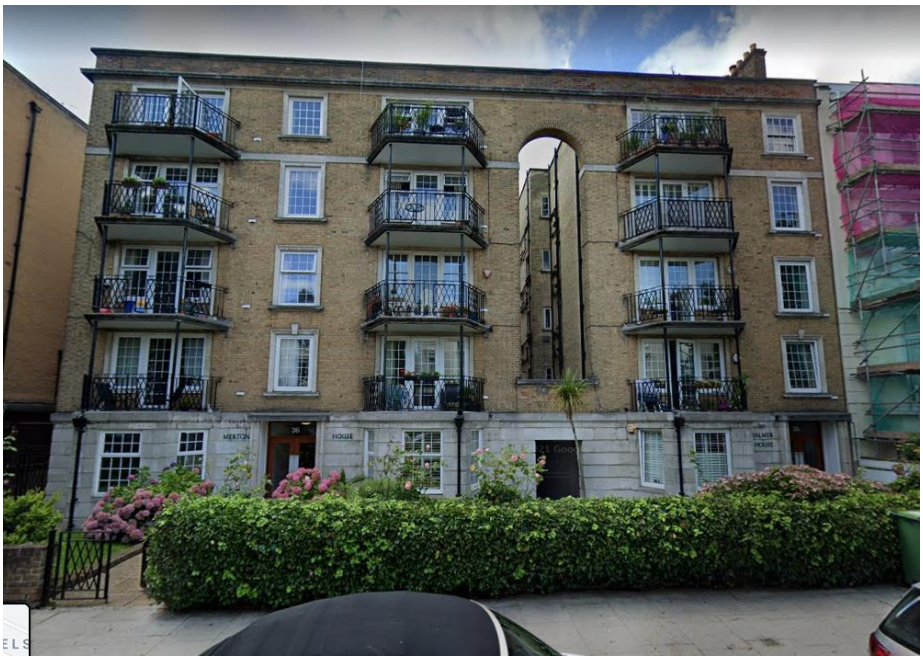

Plate 1: East facing (front) elevation of 35 Belsize Park.

3 HERITAGE PLANNING POLICY CONTEXT

3.1 Introduction

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 2021, Annex 2 page:67).

3.2 Legislation

3.2.1 Listed Buildings and Conservation Areas are protected under the Planning (Listed Building and Conservation Areas) Act (1990). In relation to development proposals affecting a Conservation Areas the Act 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), 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 2021, 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 2021, para:200).

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 2021, 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 2021, 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 2021, para:194).

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 2021, para:201). Less than substantial harm to a designated asset would require public benefits including the securement of an optimum viable use (MHCLG 2021, para:202).

3.4 Local Planning Policy

3.4.1 Local plan policy comprises the following:

- Camden Local Plan (adopted 2017).

3.4.2 The following policies are considered to be of relevance to the determination of the proposals:

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

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 works to the building were reactive due to the necessary removal of the gas supply from the affected units following a gas leak. Cadent Gas have sought to immediately restore the gas supply to these flats in accordance with current gas industry standards to maintain the well-being of the residents who use gas for heating, cooking and hot water.

4.1.2 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.

4.1.3 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 new or replacement 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 to all new and replacement works.

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 eliminating or removing potential hazards to residents. Different installation design options result in different hazards and potential different levels of risk and systematic approach is required to minimize the risk.

4.2.4 The known hazard to be addressed 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 using 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.

5.2.9 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.

4.2.9 In full consideration and application of this guidance including best practice from lessons learned, Cadent have installed an external scheme to restore the gas supply to the affected flats within Falmer House, 35 Belsize Park.

4.2.10 The proposed 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 the exterior of the building in view of its location within Belsize Conservation Area.

4.3 Planning Synopsis

4.3.1 It is appreciated that the regulations referenced within 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, such regulations are now of great relevance in light of the clear policy direction given by the recently updated London Plan – in particular, policy D12 which relates to Fire Safety.

4.3.2 Policy D12 states that development proposals must achieve the highest standards of fire safety. Relevant to the works presented within this submission are points 2 and 3

of this policy which state that such proposals:

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.

4.3.3 We would therefore invite the decision maker to place significant material weight on the measures set out within this application 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 scale, amount and appearance of the works for which planning permission is sought. By way of a concise summary, the proposals involve the installation of external gas pipe apparatus to the south west facing elevation and the south east facing return elevation of Falmer House, 35 Belsize Park (in retrospect).

5.1.2 The works undertaken relate solely to the restoration of the existing gas supply to the affected flats in line with the current Gas Industry Regulations. No new gas connections have been established to any other flats within Falmer House, therefore, there will be no increase in emissions as a result of this development.

5.1.3 In arriving at the final design for the installation the following options have been considered and discounted by Cadent Gas' engineers:

1. The re-use of the existing internal pipework;
2. The re-use of the internal pipe runs to accommodate the new pipework (internal installation).

5.1.4 In consideration of option 1, this was not advanced as a suitable solution due to the condition of the existing pipework which has been subject to a gas leak.

5.1.5 In respect to option 2, this was not advanced as a solution due to current industry standards where the primary aim for new or replacement works is to reduce or eliminate the potential risk to occupiers from a potential escape of gas from the network as required by the current installation standards as part of their new and replacement works. A replacement gas riser scheme that is installed to the exterior of the building provides a lower risk solution in term of resident's safety.

5.1.6 The design approach adopted for the installations has considered the guidance provided in the Council's Conservation Area Appraisal and has sought to keep the extent of new external pipework to the minimum whilst complying with the relevant industry standards and regulations.

5.1.7 The full extent of the necessary pipe installations is shown on drawing refs. CA12446-002 to CA12446-005.

5.2 Extent of subterranean gas pipework

5.2.1 To restore the gas supply to the affected units within Falmer House, a new subterranean gas connection from the parent mains has been established.

5.2.2 The existing parent mains run beneath Belsize Park directly to the east of the site. A new subterranean gas connection extends in a north western direction towards the south eastern corner of Falmer House before emerging above ground level on the south west (facing) elevation at the south east corner, behind the enclosing front wall of the building.

5.2.3 The subterranean elements of the new gas connection do not form part of these planning proposals, these elements able to be undertaken as permitted development, but are included in the description of the proposals to contribute to their wider context of the application.

5.3 **Extent of installations to Falmer House**

5.3.1 A new subterranean gas pipe emerges above ground on the south west facing (side) elevation near to the south eastern corner of the building. The 1.5" diameter gas pipe travels vertically to first floor level before turning perpendicular and continuing horizontally on the south west facing elevation. This pipework is installed behind the enclosing front wall of the building and is therefore screened from views along the public highway.

Plate 2: Extent of new gas pipe installations on the south west facing elevation of 35 Belsize Park.

5.3.2 The horizontal gas pipe continues along the south west facing elevation for 5m towards the south east facing return elevation. Here, the pipe extends for approximately 1m horizontally before turning perpendicular and continuing vertically down the elevation for 2.5m, then regaining its horizontal route wrapping around the

corner of the south east facing return elevation and back on to the south west facing elevation.

Plate 3: Route of the long section of pipework on the south west facing elevation

Plate 4: Gas pipework wrapping around the south east facing return elevation of the building

Plate 5: Route of horizontal pipework including meter boxes on the south west facing elevation.

5.3.3 The pipework continues along the south west facing elevation of Falmer House at low level connecting to 5 no. external gas meter boxes that provide individual gas supply to the flats within Falmer House. A ¾" copper outlet pipe derives from each of the gas meter boxes.

5.3.4 Four of the five gas outlets travel up the south west facing elevation. The pipes are grouped closely together and travel in parallel with one another. As each gas outlet reaches the height of their required entry point (at first to fourth floor levels), they turn perpendicular travelling towards their entry point before entering through the fabric of the building into the interior of the affected flat. The gas outlet serving the ground floor flat, enters through the fabric of the building at cill level, adjacent to its meter box.

Plate 6: External gas pipework serving ground floor flat at Falmer House flats at 35 Belsize Park

5.4 External Finishes and Appearance

5.4.1 To minimise the appearance of the works to the exterior of the Falmer House appropriate coloured finishes have been applied to the external pipework and its bracket and clip fixings:

- Where gas riser pipework is adjacent brickwork, a black painted finish to match the existing down pipes has been applied.

5.4.2 The means of attaching the pipework to the building wherever possible has been fixed in the mortar joints rather than the brickwork to enable easy removal in the future should it be required.

5.5 Access

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

6 ASSESSMENT OF SIGNIFICANCE

6.1.1 The NPPF (para 194) 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. The heritage asset subject to assessment within this report is Belsize Conservation Area.

6.1.2 To inform a proportionate assessment of the significance of Belsize Conservation Area, baseline data was obtained from the following:

- The National Heritage List for England (Historic England Website) (Accessed 2022);
- Belsize Conservation Area Statement (Accessed 2022).

6.2 Assessing significance

6.2.1 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 may be archaeological, architectural, artistic or historic'.*

6.2.2 A description of the heritage significance of the Belsize Conservation Area has been provided in proportion to both its importance and the extent of the works undertaken. The contribution of Falmer House to the special character and appearance of the Conservation Area is subsequently discussed to enable the impact of the works, if any, to be determined.

6.2.3 The assessment of significance is not intended to be a detailed analysis of the Belsize Conservation Area for which the reader should be referred to the Council's Conservation Area guidance.

Historic Interest

6.2.4 Prior to the 18th Century, the area now encompassing Belsize Conservation Area comprised of agricultural land with some farms and houses. The land that is now within the Belsize Conservation Area was subsequently split between two freehold owners; The Dean and Chapter of Westminster acquired the northern section of Belsize whereas the southern portion of the land was acquired by Eton College from Henry VI in 1449.

6.2.5 By the early-19th Century, Belsize House and the surrounding estate was leased to the Earl of Chesterfield who in turn, sublet the land. After many years, Belsize House was restored and rented for a number of years by Spencer Perceval, who later became

Prime Minister. In 1807, the Earl disposed of his lease and the land was divided into eight portions and sold to four local men which influenced the subsequent pattern of development within the area.

6.2.6 In 1853, leasehold owner of Belsize Park, Christopher Palmer, demolished Belsize House within the intention of developing an exclusive estate with its own square and church.

6.2.7 Development of the Belsize area residential suburb began in the middle of the 19th Century with the Italianate influenced villas dating from this period of development. Daniel Tidey was the principal developer in the area during this time with the consistency in appearance of the buildings leading to the area being known as 'Tidey Town'. The large villas built by Tidey were aimed at wealthy professionals with attic and basement space for service staff with the intention being to attract 'carriage classes' to the north of London.

6.2.8 By the early 20th Century, there was a decline for large houses, which led to the development of smaller terraced houses and mansion flats close to transport links.

Architectural Interest

6.2.9 The character of the Belsize Conservation Area largely derives from mid-19th Century Italianate styled villas. There are several distinct areas within the conservation area with varying character and appearance. The Belsize Conservation Area Statement has divided the conservation area into six sub-areas. Falmer House is located within sub area 1 which covers Belsize Park.

6.2.10 Belsize Park is a distinct and substantial area of mid-19th Century villa development that has consistent built character created by the height of the buildings, which are mostly three storeys with lower ground and sometimes an attic level, their relationship to the streets with front gardens set behind boundary walls, their Italianate Styling and their semi-detached composition.

6.2.11 In Belsize Park, Belsize Park Gardens, Belsize Grove, Buckland Crescent and Belsize Square were built as part of the Belsize Park development undertaken by Daniel Tidey. The predominant building types are symmetrical paired villas with hipped slate roofs and overhanging eaves supported on brackets. In addition, the street facing elevations have large, rusticated quoins, recessed sash windows diminishing in size on successive upper floors with classically detailed surrounds, canted three light bays at ground floor and steps up to portico type porches which typically have Ionic columns.

6.2.12 Many of the buildings are finished white stucco render.

6.2.13 The closely spaced villas maintain a continuous building line and their repeated forms with narrow gaps between give a uniform rhythm to the streets and provide important glimpsed views. Mature trees and dense vegetation form the dominant features of the street scene in many of the avenues and gardens. Roadside trees and front gardens on Belsize Park help to maintain the residential feel of this well used north-south route.

6.2.14 The architecture and character of a large amount of the conservation area is a result of a partnership between Christopher Palmer and Daniel Tidey.

6.2.15 In consideration of the contribution of Falmer House to the character and appearance of the area, the building represents a later phase of building within the area and historic mapping reveals that Falmer House and Merton House replace earlier buildings which likely displayed the coherent Italianate influenced architectural style presented by the surrounding properties. Falmer House and Merton House both display a coherent architecture evidencing their contemporary origins. The architecture of the buildings has not replicated the distinctive Italianate style of the earlier buildings however the scale of the buildings, their proportions and vertical emphasis are consistent with the earlier villas on Belsize Park and the buildings respect the distinctive townscape rhythm.

7 ASSESSMENT OF IMPACT

7.1.1 The NPPF stipulates two levels of potential adverse 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).

7.1.2 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.

7.1.3 The works to the building have been designed to:

- Be the minimum extent necessary to restore a safe and compliant gas supply to the occupiers and to appropriately conserve the appearance of the building;
- Avoid installations to principal, street facing elevations wherever possible;
- Have a suitable coloured finish – black to match the colour of the exiting downpipes present on the building;
- Be reversible and easily removed in the future if necessary.

7.1.4 The 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 Having considered the contribution of Falmer House to the character and appearance of Belsize Conservation Area and the extent of the works including the position and finish, it is judged that no harm results to the character and appearance of the conservation area and its significance is preserved. This is based on the following grounds:

- The installations by virtue of being sited on a side elevation of the building which is of lower value to the conservation area overall would not affect the key features or elements which provide the building with its interest and which contribute to the distinct character and appearance and the conservation area;
- The installations have been designed to sit quietly on the building through the application of appropriate painted finishes and siting on a side elevation;
- The proposed works would not upset the scale, massing or rhythm of Falmer House or the overall original design intention of the building.

8 CONCLUSIONS

8.1.1 Wardell Armstrong LLP has been instructed by Cadent Gas Ltd to submit a full planning application (in retrospect) for the installation of external gas pipe apparatus to the exterior of Falmer House, 35 Belsize Park, London, NW3 4DY.

8.1.2 Falmer House is located within Belsize 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 the conservation area.

8.1.3 The works to Falmer House would not disrupt the original design intention of the building expressed most notably to its frontage, nor does the installation affect any of the key features held by the building which contribute to the character and appearance of the conservation area with the scale, proportions and rhythm unaffected. As such the significance of Belsize Conservation Area would be preserved.

8.1.4 In application of the NPPF, the works result in no harm to the significance of Belsize Conservation Area with its special character and appearance preserved. The works therefore comply with the requirement of national and local policy specifically policy D2 of Camden's Local Plan.

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 2021
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 2021

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