

**Appeal Case: APP/R5510/W/23/3330779**

**Response to London Borough of Hillingdon's Appeal Statement: Upgrading of the existing gas supply via the installation of external gas pipe apparatus at Colwey House, Uxbridge, UB8 2AJ**

On behalf of Cadent Gas Limited, Wardell Armstrong LLP (WA) has reviewed the Appeal Statement provided by London Borough of Hillingdon relating to the appeal against the refusal of planning permission and listed building consent for "upgrading of the existing gas supply via the installation of external gas pipe apparatus" at Colwey House, Uxbridge, UB8 2AJ.

*WA response to paragraph 2.2 of the LPA Statement of Case*

Cadent Gas has worked with several local authorities within London who have accepted that the provision of a safe and complaint supply of gas is a proportionate public benefit to outweigh less than substantial harm to a building within a conservation area and/or a listed building. Some of these examples are referenced in Appendix 7 of the Statement of Case (CA12938 Report 001) submitted in October 2023. The residents within the building have a right to a gas supply. To date, there are no adopted planning policies that state that residential properties cannot have a gas supply.

As demonstrated in the Design Options Appraisal, these proposals represent a solution that offers the least amount of harm to the listed building and a gas supply that is fully compliant with the required Gas Industry Standards. As such, the proposals would provide the safe provision of gas to the residents of Cowley House and protect the structural integrity of the building from any potential catastrophic events. Further information relating to the need to adhere to the currently adopted Gas Industry Standards is included in the Design Options Appraisal.

Further to this, and as stated in the Statement of Case (CA12938 Report 001), the works undertaken as part of application 15841/APP/2023/1831 "Repair of gas supply via the installation of minor external gas pipe apparatus", were necessary due to a gas leak occurring at Cowley House. Qualified gas engineers established that the gas leak occurred outside of the building within an inground section of gas pipe, as such only this section of pipework required replacement to maintain a gas supply to the affected occupiers.

This short-term solution is possible as the leak occurred in the external inground gas pipework and as such only external pipework needed to be replaced. Should a future gas leak occur to the existing internal gas pipework (gas riser pipework within the building), the full external installation would be required in line with the Gas Industry Regulations whereby all new and replacement gas riser pipework should be sited in well-ventilated areas.

The recent gas leak within the existing network suggests that the gas riser pipework supplying gas the Cowley House is deteriorating. For the safety of the residents, it is therefore important that the existing gas supply is upgraded allowing for the gas riser pipework to be sited externally where in the event of a gas leak from the riser, the escaped gas can filter directly into the atmosphere rather than into unventilated areas where a potential build-up of gas could occur.

*WA response to paragraph 3.1 of the LPA Statement of Case*

As outlined to the Local Planning Authority during the determination of the planning and listed building consent applications, the gas pipes entering the building would connect to a gas meter box

located immediately on the interior of the elevation where the gas pipe enters through. The meter boxes would be located in the kitchens of the affected flats. The kitchens of the affected flats are not in their original conditions as such, it was not considered that the meter boxes would cause harm to this area of the asset and therefore it would not be proportionate to obtain floor plans for of the building.

This approach has been accepted widely across London Local Planning Authorities. Planning permission and listed building consent has been granted for the installation of external gas pipework on all blocks of the Grade II listed Hallfield Estate.