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CADENT GAS LIMITED

COWLEY HOUSE, COWLEY ROAD, UXBRIDGE

DESIGN AND HERITAGE STATEMENT

MARCH 2022 (REVISED JANUARY 2023)

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PREPARED BY:

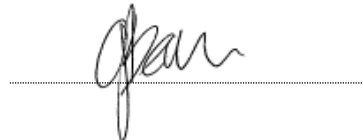
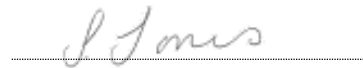
S Jones Senior Planning Consultant

CHECKED BY:

L Goring Technical Director – Heritage

APPROVED BY:

C Bean Technical Director



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1 INTRODUCTION

- 1.1.1 This Design, Access and Heritage Statement has been prepared to accompany an application for listed building consent and planning permission for the installation of external gas pipework and apparatus to the exterior of Cowley House, Cowley Road, Uxbridge, UB8 2AJ.
- 1.1.2 The proposed installations at this property form part of Cadent Gas' proactive Mains Replacement Programme whereby the works are necessary to ensure compliance with a Health and Safety Executive (HSE) enforcement notice which requires Cadent Gas Ltd to replace all iron gas mains within 30m of a building by 2030.
- 1.1.3 Cowley House is a Grade II listed building (NHLE Ref: 1080189). The proposed works have the potential to directly impact upon the significance of the listed building as a result of physical change to its exterior.
- 1.1.4 In accordance with the NPPF (Par 194), this statement includes a description of the significance of the heritage assets potentially affected by the proposed works in proportion to their importance and to the extent of the works for which consent/permission is sought, to determine the level of harm, if any, to their significance.
- 1.1.5 This report has followed Historic England's Good Practice Advice notes 2 'Managing Significance in Decision-taking in the Historic Environment' (2015) and 3 'The Setting of Heritage Assets' (2017) and Advice Note 12 'Statements of Heritage Significance' (2019).
- 1.1.6 This report should be read in conjunction with the drawings prepared by Wardell Armstrong, drawing refs CA12470-001, 002, 003B, 004, 005B, 006, 007B, 008, 009B, 010, 011B and 012B. Full drawings and schedules are not therefore replicated within this report.

2 DEFINITIONS OF TERMS AND HERITAGE PLANNING POLICY CONTEXT

2.1.1 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).

2.2 Legislation

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

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

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

‘in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the secretary of state shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses’ (section 66).

2.3 National Policy

2.3.1 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).

2.3.2 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).

- 2.3.3 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).
- 2.3.4 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).
- 2.3.5 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).
- 2.3.6 Developments where substantial harm to or total loss of significance of a designated heritage asset would occur 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 2021, para:202).

2.4 Local Policy

2.4.1 Relevant planning policy is presented within the following document:

- Local Plan Part 1 – Strategic Policies
- Local Plan Part 2 – Development Management Policies

2.4.2 Specifically policies HE1: Heritage within Part 1 and policies DMHB 1: Heritage Assets and DMB 2: Listed Buildings within Part 2 are relevant and are replicated below:

Policy HE1: Heritage

The Council will:

- 1. Conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes: Historic village cores, Metro-land suburbs, planned residential estates and 19th and 20th century industrial areas, including the Grand*

Union Canal and its features; Designated heritage assets such as statutorily Listed Buildings, Conservation Areas and Scheduled Ancient Monuments; Registered Parks and Gardens and historic landscapes, both natural and designed; Locally recognised historic features, such as Areas of Special Local Character and Locally Listed Buildings; and Archaeologically significant areas, including Archaeological Priority Zones and Areas.

2. Actively encourage the regeneration of heritage assets, particularly those which have been included in English Heritage's 'Heritage at Risk' register or are currently vacant.

3. Promote increased public awareness, understanding of and access to the borough's heritage assets and wider historic environment, through Section 106 agreements and via community engagement and outreach activities.

4. Encourage the reuse and modification of heritage assets, where appropriate, when considering proposals to mitigate or adapt to the effects of climate change. Where negative impact on a heritage asset is identified, seek alternative approaches to achieve similar climate change mitigation outcomes without damage to the asset.

Policy DMHB1: Heritage Assets

A) The Council will expect development proposals to avoid harm to the historic environment. Development that has an effect on heritage assets will only be supported where:

- i) it sustains and enhances the significance of the heritage asset and puts them into viable uses consistent with their conservation;*
- ii) it will not lead to a loss of significance or harm to an asset, unless it can be demonstrated that it will provide public benefit that would outweigh the harm or loss, in accordance with the NPPF;*
- iii) it makes a positive contribution to the local character and distinctiveness of the area;*
- iv) any extensions or alterations are designed in sympathy, without detracting from or competing with the heritage asset;*
- v) the proposal would relate appropriately in terms of siting, style, scale, massing, height, design and materials;*
- vi) buildings and structures within the curtilage of a heritage asset, or in close proximity to it, do not compromise its setting; and*
- vii) opportunities are taken to conserve or enhance the setting, so that the significance of the asset can be appreciated more readily.*

B) Development proposals affecting designated heritage assets need to take account of the effects of climate change and renewable energy without impacting negatively on the heritage asset. The Council may require an alternative solution which will protect the asset yet meet the sustainability objectives of the Local Plan. C) The Council will seek to secure the repair and reuse of Listed Buildings and monuments and improvements to

Conservation Areas on the Heritage at Risk Register, through negotiations with owners, the provision of advice and guidance, the use of appropriate legal action, and through bids for external funding for improvement works.

Policy DMHB2: Listed Buildings

A) Applications for Listed Building Consent and planning permission to alter, extend, or change the use of a statutorily Listed Building will only be permitted if they are considered to retain its significance and value and are appropriate in terms of the fabric, historic integrity, spatial quality and layout of the building. Any additions or alterations to a Listed Building should be sympathetic in terms of scale, proportion, detailed design, materials and workmanship.

B) Applications should include a Heritage Statement that demonstrates a clear understanding of the importance of the building and the impact of the proposals on its significance.

C) The substantial harm to or total loss of significance of a statutory Listed Building will only be permitted in exceptional circumstances when the nature of the heritage asset prevents all reasonable use of the building, no viable use can be found through marketing, grant-funding or charitable or public ownership and the loss is outweighed by bringing the site back into use. In such circumstances, full archaeological recording of the building will be required.

D) Planning permission will not be granted for proposals which are considered detrimental to the setting of a Listed Building.

2.4.3 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

3 HERITAGE ASSETS

- 3.1.1 Cowley House is a Grade II listed building. The listing description for the building provides the following information on reasons for designation:

C18 house, altered and enlarged C19. Brown brick with red dressings. 3 storeys, 5:3 double hung sashes with flat arches. Pilasters at angles running through 1st and 2nd storeys. Left hand 2-storey splayed bay; right hand C19 stone porch, cement finished 2nd storey, with parapet. Cornice, modern blue pantiles. Inside, decorations have survived from mid C18. On 1st floor, rooms to north-east and south-east have original panelling; one has a box cornice and the other a chimney piece with marble inserts. Similar chimney-piece and panelling in ground floor south-east room; and in south-west room decorative plasterwork and a later marble fireplace of good quality.

- 3.1.2 The property forms part of a small cluster of Grade II listed buildings at the junction of Cowley Road and High Street which includes Old Vine Cottage (NLE Ref: 1080232) and Poplar Cottage (NHLE Ref: 1358384) both located to the south of Cowley House.
- 3.1.3 Due to the nature of the proposed works it is judged that they would not result in changes to the setting of the adjacent and nearby listed buildings which would affect an appreciation or understanding of their significance and therefore no assessment of their significance has been undertaken within this report.
- 3.1.4 As such, only Cowley House will be discussed further in this report.

4 SIGNIFICANCE

4.1 Assessment Methodology

- 4.1.1 A proportionate description of the significance of each asset potentially affected by the proposed development should be provided to satisfy the requirements of the NPPF.
- 4.1.2 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'*.
- 4.1.3 As stated within the NPPF 'significance derives not only from the physical fabric of a heritage asset but also from its setting' (MHCLG 2021, Annex 2 page:71).
- 4.1.4 In respect of identifying the importance of setting to the identified significance of a heritage asset, Historic England's good practice guidance presented in the *Setting of Heritage Assets (2017)* will be utilised.

4.2 Description of Significance

- 4.2.1 The description provided below is in proportion with the importance of Cowley House to determine the impact of the proposals to its significance. The assessment of significance is not intended to be a detailed analysis of the asset. The description below has been informed by the Historic England listing entry for the property.

Historic Interest

- 4.2.2 The building holds historic interest in its fabric and features which provide evidence of the original 18th Century construction techniques and materials and the alteration and enlargement of the building in the 19th Century.
- 4.2.3 Cowley House has interest in its association with Edward Hilliard, a Member of Parliament for Horsham from 1802 to 1806 and the family during the 19th Century. The Hilliard family occupied Cowley House until the 1880's. It was then leased, though J.E. Hilliard, Edward's son, continued to live in the parish as rector until 1902.
- 4.2.4 The original part of the building extends to three stories and is of brown and red brick construction displaying an architectural style typical of the 18th Century, potentially having been rebuilt by Edward Hilliard.
- 4.2.5 During the 19th Century a two-storey block on the north side was added. This wing was later gutted when the whole house was badly damaged by a fire in 1928.

4.2.6 Around the mid-20th Century, Cowley House was subdivided into several dwellings.

Architectural Interest

4.2.7 Cowley House has architectural interest in its external appearance as an example of 18th Century residential development displaying both early and late Georgian architecture through later alterations of the building.

4.2.8 The building is of three-storeys in height with a basement level. Its elevations are of brown brick construction with horizontal channelling at ground floor level and red brick décor. Off-white rendered storey banding is located between ground and first floor levels with angled rendered pilasters at the corners which are channelled to the ground floor.

4.2.9 The original building was constructed in the 18th Century and later enlarged to the north during the 19th Century. The original extent of the building is visible by the roof of the building and placement of the chimney stacks; the roof of the original 18th century construction is hipped with two tall chimney end stacks to the north and south edges whereas the 19th Century extension has a parapet roof displaying a flat edge. The addition of a three-storey canted bay window to the main frontage has resulted in the loss of the original 18th Century design intention which would have presented a simple symmetrical arrangement with fenestration arranged around a central entrance, now concealed.

4.2.10 Window openings comprise double hung sash windows with flat brick arches and red brick surrounds.

4.2.11 In addition to the large, canted bay to the main frontage, a further canted bay is located on west facing elevations of the building. The building is accessed via a wooden door painted navy with glass panelling with a projecting decorative stone porch located within the 19th Century extension.

4.2.12 The interior of the building offers architectural interest through the retention of original features such as original panelling, a box cornice and a chimney piece with marble inserts. In a south west room decorative plasterwork and later marble fireplace of good quality is noted in the listing description as remaining. Such features are also of historic interest informing on the status and the function of the original spaces with the more important rooms having greater levels of decoration and embellishment and benefitting from fireplaces for heating.

Contribution of Setting

- 4.2.13 The setting of the building has undergone some change however the building retains a large garden area enclosed behind brickwork walling; the scale of the garden and its enclosure reflective of the historic status of the building.
- 4.2.14 The orientation of the building, to have its principal frontage facing east towards Cowley Road evidences an intention to face and interact with Cowley Road.

5 EXPLANATION FOR THE WORKS AND DESIGN CONSIDERATIONS

5.1 Need for the works

5.1.1 The need for the proposed works derives from the proactive Gas Mains Replacement Programme (MRP) currently being undertaken by Cadent Gas Ltd. The upgrading works within this programme need to be undertaken to ensure compliance with a Health and Safety Executive (HSE) enforcement notice which requires Cadent Gas Limited to replace all iron gas mains within 30m of a building by 2030.

5.1.2 The proposed works seek to upgrade the existing gas supply to the building as part of the MRP, therefore, the proposals will not result in any additional emissions, the units within the building benefitting from an existing gas supply.

5.2 Design Considerations

5.2.1 In designing works to restore gas supplies to properties Cadent Gas must consider a series of technical design considerations alongside the physical constraints of a site.

Technical Consideration

5.2.2 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/upgrade 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.

5.2.3 In addition to IGEM/G/5 Cadent utilize multiple documentation to comply and maintain the standards needed to facilitate new and replacement gas works. Key documents used to inform both the design of the pipework (materials, route locations, pipework lengths) 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

5.2.4 In application of the above, Cadent in their approach to designing new and replacement gas schemes must assess the risk of different design options with the most suitable design solutions eliminating or removing potential hazards (release of gas which could lead to fire and explosion) to residents. Different installation design options result in different hazards and different levels of risk and a systematic approach is required to minimize the risk.

5.2.5 Design solutions explored by Cadent and sought by IGEM/G/5 therefore seek to:

- 1.) Prevent failure of the pipework through using appropriate materials, methods and fixing for installations and apparatus; and
- 2.) Prevent the containment of a gas leak through ensuring new works are appropriately positioned to allow ventilation and access for maintenance and regular inspection.

Physical Considerations

5.2.6 In applying the above standards in the design process Cadent must also consider the physical constraints of a Site.

5.2.7 Cowley House is a Grade II listed building displaying architectural interest through its 18th Century and 19th Century detailing. The statutory designation has informed the design of the proposed works which seek to avoid installations in locations where they have potential to interfere with key architectural features of the building. This has been possible through a continued review of the design proposals and research undertaken to understand the special interest of the building.

5.2.8 The design has considered the internal arrangement of the individual units within the building with pipe routes seeking to keep internal gas riser and lateral installations (that is the pipework which connects to the internal gas meter boxes) to an absolute minimum as well as to rooms with an outside wall and window(s). It is also essential to keep the extent of internal gas riser pipework to a minimum to prevent any potential build-up of escaped gas internally in unventilated areas, in the event of a gas leak from the network. By siting gas riser pipework externally, the risk of this occurring is reduced, providing the opportunity for any escaped gas to filter directly into the atmosphere.

5.2.9 Further to this and in application of risk as referenced in para 5.2.4 – 5.2.5, Cadent Gas will not undertake the installation of gas pipework systems internally due to an increased risk to human life. As gas riser pipework connects directly to the parent gas

mains (which supplies gas to the buildings within the surrounding area) the residents within the building will not have any control over the gas supply in the event of a gas leak and would not be able to terminate the gas supply until a gas engineer arrived on site. During this time, a vast amount of gas could build up internally within the building. Instead, limited sections of gas riser are installed internally, connecting directly to gas meter boxes and associated gas outlet pipes upon entering into the building. Gas meter boxes, provide the individual residents the ability to terminate the gas supply from the gas outlet pipes, in the event that a leak should occur from the internal outlet pipe.

5.3 Planning Synopsis

- 5.3.1 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 of great relevance in their application of the clear policy direction given by the recently updated London Plan – in particular, policy D12 which relates to Fire Safety.
- 5.3.2 Policy D12 states that development proposals must achieve the highest standards of fire safety. Relevant to the proposals 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.
- 5.3.3 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.

6 DESIGN APPROACH AND MITIGATION

6.1.1 In arriving at the final design for the proposed installation the following options have been considered and discounted by Cadent due to the current industry standards and physical constraints of the Site as referenced above:

1. The re-use of the existing internal pipe run;
2. Installation of gas riser pipework within the communal hallway;
3. Relocation of gas meters to exterior and installation of new outlet pipework;
4. External Gas Riser Installation.

6.1.2 The design evolution process has been discussed in detail in the accompanying Design Options Appraisal Document prepared by Wardell Armstrong which should be read alongside this statement.

6.2 Summary of Proposed Installations

6.2.1 This section provides a description of the proposed works for which planning permission and listed building consent is sought. The proposed installations have been subject to amendment following consultation comments from Hillingdon Council's conservation officer received 06 June 2022.

6.2.2 The proposed works now entail the installation of 4 no. subterranean gas connections from the upgraded gas mains. Increasing the number of the inground (below ground) supplies has enabled a reduction in the extent of the external gas pipework.

6.2.3 The first subterranean connection will emerge above ground to the north of the main communal entrance on the east facing elevation. The pipe will rise vertically before wrapping around the north eastern corner to continue on the north facing elevation.

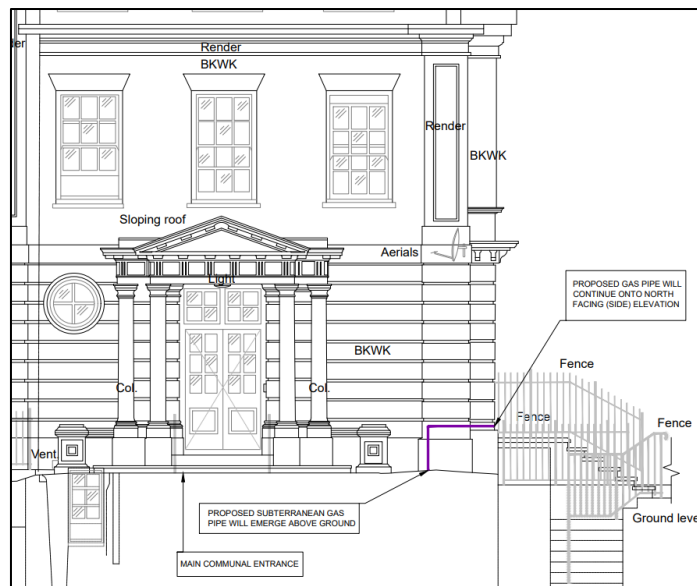


Plate 1: Route of proposed pipework to the north eastern corner of Cowley House

- 6.2.4 Upon reaching the north facing elevation, the horizontal gas riser will travel at ground floor level before descending to basement level and providing a gas connection to flat 19.
- 6.2.5 The second subterranean gas pipe will emerge above ground level on the west half of the north facing elevation. On emerging, the vertical gas riser will extend for approximately 9m supporting 3 no. lateral connections to flats 4, 9 and 15. A horizontal section of riser pipework will also extend from the base of the 9m gas riser which will wrap around the north western corner of the building to continue on the west facing elevation.

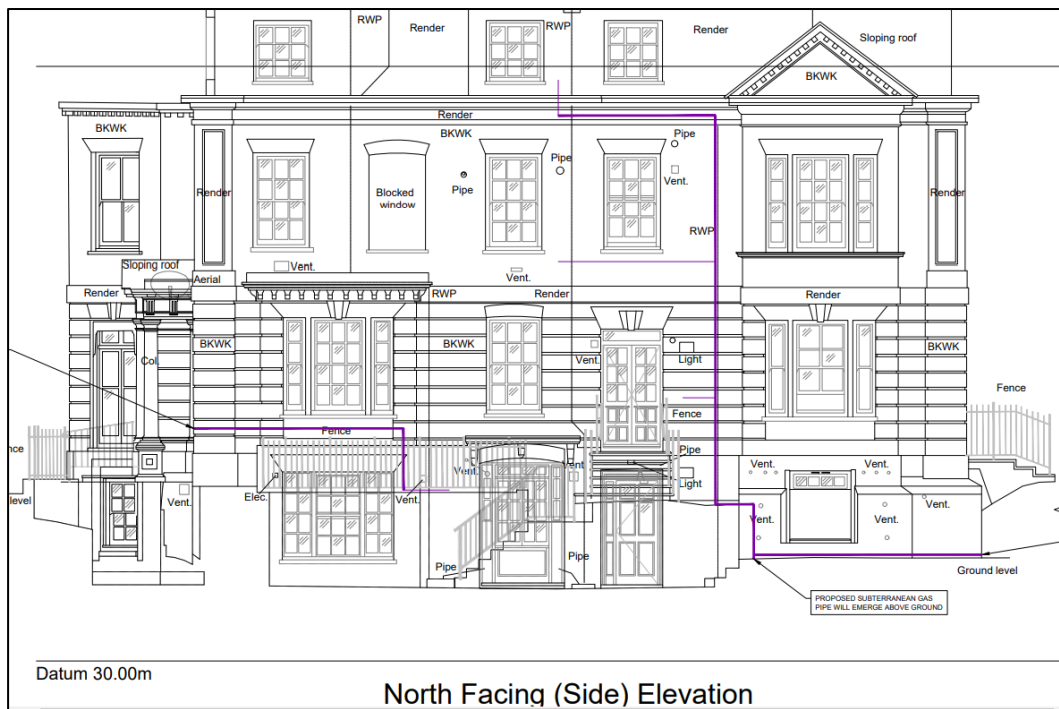


Plate 2: Route of proposed pipework to the north facing elevation of Cowley House

- 6.2.6 Upon reaching the west facing elevation, the horizontal gas pipe will travel at basement level supporting 2 no. gas risers and a lateral connection to flat 18.
- 6.2.7 The first gas riser will be located close to the junction of the south facing return and the southern section of the west facing elevation. The gas riser will extend from basement level to eaves level supporting 4 no. lateral gas pipes. Three of the four pipes will extend northward wrapping around the outer corner of the south facing return and entering flat 3, 8 and 14 on the northern section of the west facing elevation. The lateral pipe serving flat 14 at second floor level will be aligned above the cornice. The fourth lateral pipe will serve flat 7. In addition, the gas riser will connect to a section of horizontal gas riser aligned below eaves level and an additional section of horizontal riser at basement level. At eaves level the horizontal section of pipe will provide gas supplies to flats 12 and 13.
- 6.2.8 The horizontal section of gas riser pipework at basement level will provide a gas supply to the second gas riser proposed to the elevation. The gas riser will extend from basement level for approximately 6 supporting lateral connections to flats 2, 6 and 17.

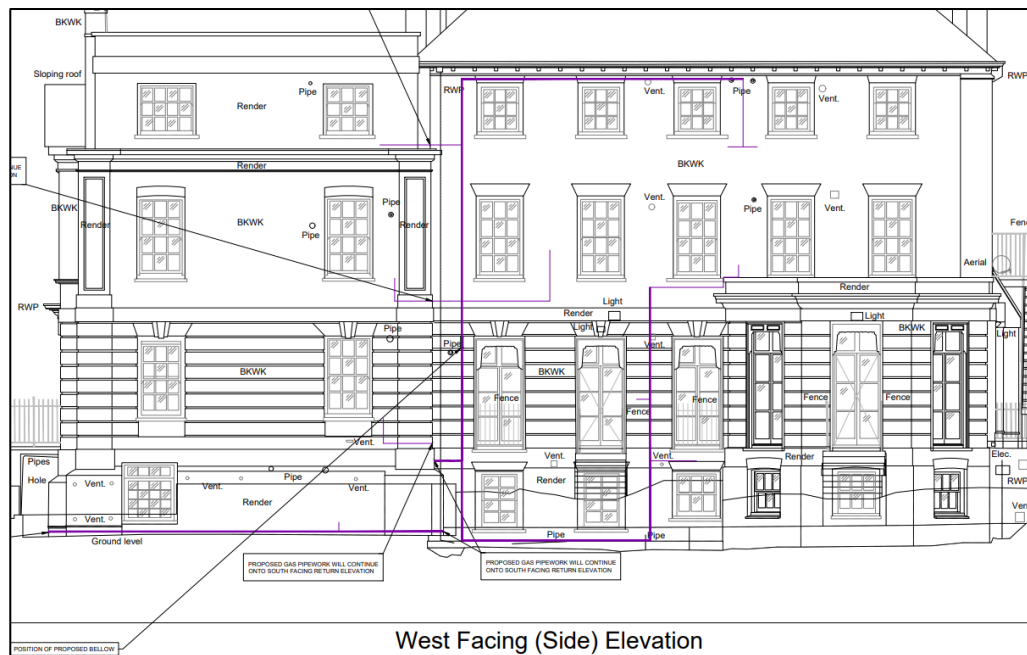


Plate 3: Route of proposed pipework to the west facing elevation of Cowley House

- 6.2.9 The third subterranean gas connection will emerge above ground to the south of the main communal entrance on the east facing elevation. The gas riser will support a lateral connection to flat 16 within the basement lightwell and connecting to a horizontal section of gas riser which will be aligned below the eaves at second floor. The horizontal section of pipe will extend southwards for approximately 5m before descending to provide a connection to flat 10.
- 6.2.10 The fourth gas subterranean gas connection will emerge above ground at the south east corner on the east facing elevation. The pipe will wrap around the south eastern corner to continue on the south facing elevation of Cowley House. Upon reaching the south facing elevation, the horizontal gas riser will connect to a vertical gas riser which will extend to second floor level. The gas riser will support 3 no. lateral connection to flats 1, 5 and 11.



Plate 4: Indicative route of pipework on (east facing elevation of Cowley House

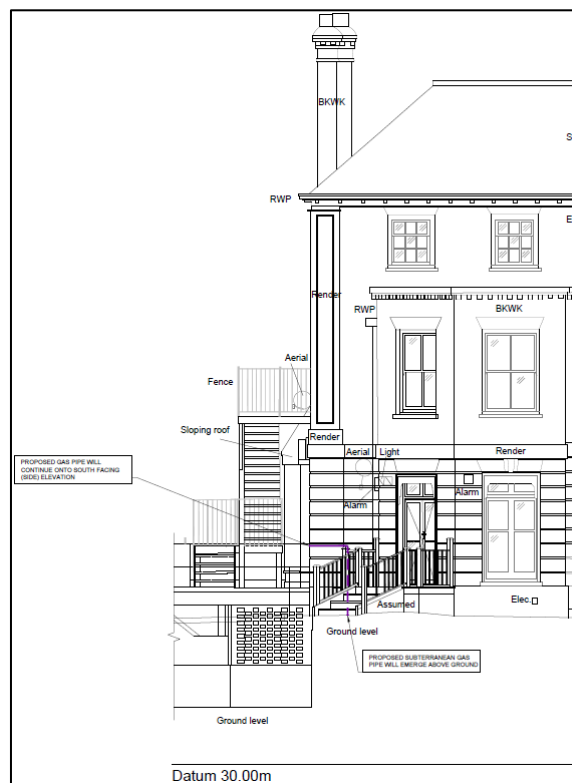


Plate 5: Route of proposed pipework to south east corner of Cowley House

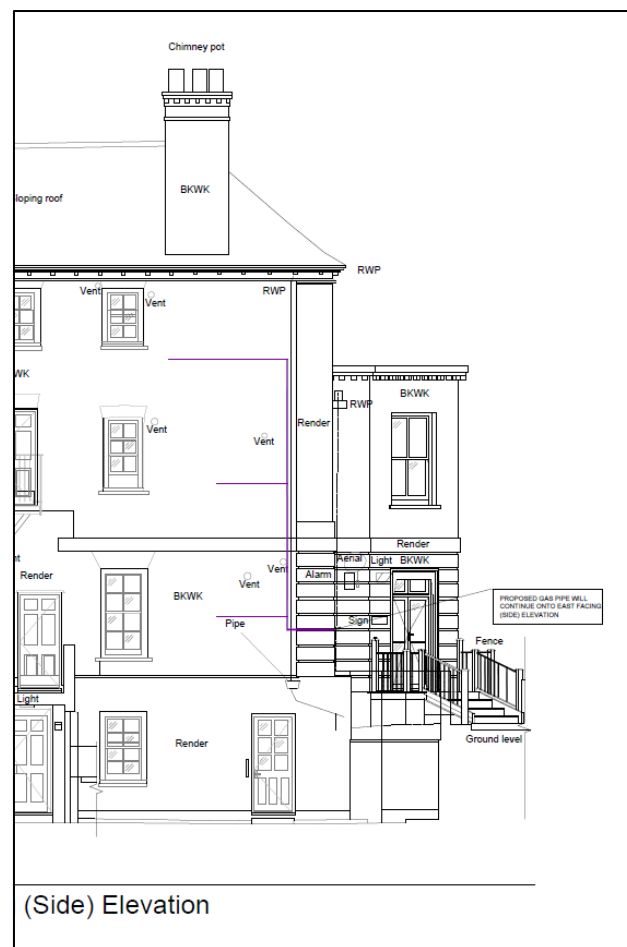


Plate 6: Route of Design Option 6 (south east corner of Cowley House)

6.3 Mitigation

6.3.1 It is recognised that potential harm to an asset can be minimised through the creation of sympathetically designed schemes such that new built form or works are reversible and are demonstrably positioned to reduce adverse impacts to special interest.

6.3.2 In response to reducing adverse impacts, the design approach to the proposed works has included the following measures to best integrate the installations and to mitigate against potential harm to heritage significance:

- Avoiding horizontal and vertical installation across centre of the principal east frontage and the canted bays window additions;
- Aligning proposed installations against existing infrastructure such as downpipes and within basement lightwell where possible to consolidate additions and minimise the appearance of the gas pipework so that it does not disrupt the simple design intentions;

- Aligning the proposed pipework in close proximity to existing vertical and horizontal features present on the building including the angled pilasters, eaves and junctions between projecting elements so as to consolidate the installations and minimise their appearance on the listed building generally so that the installations are integrated sympathetically and do not disrupt the simple design intentions;
- Applying an off-white painted finish to pipework installed against rendered areas of the exterior to match the coloured finish;
- Applying a brown colour painted finish to pipework crossing brickwork to the exterior of the building;
- Avoiding interference with or disturbance to existing decorative features;
- To be reversible and easily removed in the future should they no longer be required.

6.3 Access

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

7 HERITAGE IMPACT ASSESSMENT

7.1 Methodology

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) (2014 and 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 018).

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.

7.2 Assessment of Impacts

7.2.1 The revised scheme which is both compliant with the requirements of IGEM/G/5 and where possible has sought to minimise potential harm to the special interest of the building. Taking into account the concerns raised by the conservation officer in respect of the original submission, the revised proposals present a more sympathetic scheme which keeps as much pipework as possible to the lower levels of the building, taking advantage of the basement lightwells, whilst also adhering to the Gas Industry Standards. In addition the scheme has been amended to avoid interference with the decorative cornice on the west facing elevation and efforts to avoid installations crossing other key architectural features elsewhere on the building have been made.

7.2.2 The proposed installations would result in some change to the external appearance of the listed building and minor loss of historic wall fabric where pipework is proposed to punch through the external walls. However, the external pipework, which must be designed in consideration of the applicable gas industry regulations, has been designed to be carefully routed and located in the least visually obtrusive way. This has been achieved through aligning and consolidating the proposed pipe installations against existing features of the listed building such as the eaves, angled pilasters,

storey banding, down pipes and within junctions with projecting elements to minimise the appearance of the installations.

- 7.2.3 The proposed locations allow for the pipework to be accommodated without being prominent in views towards the listed building from Cowley Road to the east of the site. Furthermore, the proposed finish of the pipework is to match the stucco render and the brown brickwork of the exterior and will further assist in minimising the appearance of the installations generally.
- 7.2.4 Aligning the proposed installations with existing external pipes and eaves of the roof helps to minimise the appearance of the additions which would be consolidated and assimilated against existing horizontal and vertical lines of the building.
- 7.2.5 It is however not possible to align pipework against existing features on the south, north and west facing elevations. In these cases the pipework and fixing clips are proposed to have coloured finish to match the brickwork. This will be RAL colour matched as close as possible to camouflage the installations.
- 7.2.6 In consideration of the special architectural and historic interest of the Grade II listed Cowley House and its significance as a house of 18th Century origin which has since been enlarged and sub-divided into flats and in view of the adopted design approach and mitigation measures, it is considered that the proposed installations would result in less than substantial harm to the significance of the building. This is based on the following moderating grounds:
- Importantly, the installations do not result in the weakening of the overall architectural composition of the 18th Century building 18th Century as displayed to the principal east frontage and by the remaining features of the interior;
 - The original prominence, status and function of the building is conserved;
 - The proposals would not affect the key features of architectural and historic interests held by the building conserved; and
 - The installations are reversible and able to be removed from the building should there no longer be a requirement for gas infrastructure.

8 CONCLUSION

- 8.1.1 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 proposed an assessment of significance of Cowley House and assessed the potential impact of the proposed works on this significance.
- 8.1.2 It is judged that the proposals due to their extent, location and proposed finish would not result in less than substantial harm to the significance of the Grade II listed building.
- 8.1.3 Importantly the proposed works do not detract from an appreciation of the architectural interest of the building as an example of 18th Century residential development of some status nor would the installation result in the loss of key architectural features which contribute towards the character and appearance of the listed building.
- 8.1.4 In accordance with the NPPF (paragraph 202), where less than substantial harm has been identified to a non-designated heritage asset, this harm should be balanced against the public benefits of the scheme which in this instance would include the following:
- A safe and compliant supply of gas to the affected occupiers of Cowley House and the opportunity to reduce the risk to life and serious injury to the occupiers in the event of a fire as required by Policy D12 of the London Plan.
 - Maintaining the safety of occupiers residing in the adjacent terraces and the sound structural integrity of the terrace as whole by installing a design that is compliant with the current Gas Industry Regulations, is considered lower risk in respect of the IGEM/G/5 risk hierarchy and Policy D12A of the London Plan.
- 8.1.5 Such benefits would be proportionate to any (less than substantial) harm.
- 8.1.6 With regard to Listed Buildings Section 66 (1) of the Town and Country Planning (Listed Building and Conservation Areas) Act (1990) stipulates that special regard should be applied to the desirability of preserving the listed building or its setting or any features of special architectural interest which it possesses. The decision maker (i.e. the Local Planning Authority) is under a statutory duty to give considerable weight and importance to this factor. The proposals would not affect any features of architectural interest held by the building nor would it affect its setting.

- 8.1.7 In consideration of local policy the proposed installations, which seek to restore the gas supply to the affected units, are judged to accord with the requirements of Policies HE1, DMHB1 and DMHB2 of the local development 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

10 BIBLIOGRAPHY

Documentary Sources

- CIfA (2014) *Standards and Guidance for Historic Environment Desk-Based Assessment*, Reading: Chartered Institute for Archaeologists
- City of Westminster Council. (1995) *Supplementary Planning Guidance: Repairs and Alterations to Listed Buildings*
- DCLG. (Revised 2019) *Planning Practice Guidance*,
- Historic England. (2008) *Consultation principles for the sustainable management of the historic environment*
- Historic England. (2017a) *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning: 3*
- Historic England. (2017b) *Consultation principles for the sustainable management of the historic environment consultation draft*
- Historic England. (2022) *National Heritage List for England downloadable GIS data*
- Ministry of Housing, Communities and Local Government. (2021) *National planning policy framework*

STOKE-ON-TRENT

Sir Henry Doulton House
Forge Lane
Etruria
Stoke-on-Trent
ST1 5BD
Tel: +44 (0)1782 276 700

BIRMINGHAM

Two Devon Way
Longbridge Technology Park
Longbridge
Birmingham
B31 2TS
Tel: +44 (0)121 580 0909

BOLTON

41-50 Futura Park
Aspinall Way
Middlebrook
Bolton
BL6 6SU
Tel: +44 (0)1204 227 227

BRISTOL

Temple Studios
Temple Gate
Redcliffe
Bristol
BS1 6QA
Tel: +44 (0)117 203 4477

BURY ST EDMUNDS

Armstrong House
Lamdin Road
Bury St Edmunds
Suffolk
IP32 6NU
Tel: +44 (0)1284 765 210

CARDIFF

Tudor House
16 Cathedral Road
Cardiff
CF11 9LJ
Tel: +44 (0)292 072 9191

CARLISLE

Marconi Road
Burgh Road Industrial Estate
Carlisle
Cumbria
CA2 7NA
Tel: +44 (0)1228 550 575

EDINBURGH

Great Michael House
14 Links Place
Edinburgh
EH6 7EZ
Tel: +44 (0)131 555 3311

GLASGOW

24 St Vincent Place
Glasgow
G1 2EU
Tel: +44 (0)141 428 4499

LEEDS

36 Park Row
Leeds
LS1 5JL
Tel: +44 (0)113 831 5533

LONDON

Third Floor
46 Chancery Lane
London
WC2A 1JE
Tel: +44 (0)207 242 3243

NEWCASTLE UPON TYNE

City Quadrant
11 Waterloo Square
Newcastle upon Tyne
NE1 4DP
Tel: +44 (0)191 232 0943

TRURO

Baldhu House
Wheal Jane Earth Science Park
Baldhu
Truro
TR3 6EH
Tel: +44 (0)187 256 0738

International office:

ALMATY

29/6 Satpaev Avenue
Hyatt Regency Hotel
Office Tower
Almaty
Kazakhstan
050040
Tel: +7(727) 334 1310