



Listed Building Consent Supporting Statement

Generator Building Demolition, Tangier
Island Water Works, Tangier Lane,
Eton, SL4 6BB

Supporting Statement incorporating Design and
Access Statement

August 2023

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1. Introduction & Background

- 1.1. This Planning Statement has been prepared on behalf of Thames Water Utilities Limited (the applicant) in relation to proposals for the demolition of a disused former generator building located at Tangier Mill Water Works, Tangier Lane, Eton.
- 1.2. Prior to the preparation of the application, advice had been sought from the Royal Borough of Windsor and Maidenhead (the Council) to confirm whether the demolition of the building would require listed building consent. The Council confirmed their position that the building is considered to be curtilage listed as the building was constructed prior to the 1st July 1948, has historically been under the same ownership as the listed pump houses on the site and is an ancillary structure in form and function to the main listed pump houses.
- 1.3. A Heritage Statement has been prepared to accompany this application for listed building consent. From review of the Heritage Statement it is considered to be clear that the building was constructed as an ancillary building to the unlisted filter house building with neither building having a direct functional link to the listed pump house buildings on the site. As such it could be considered that the building does not meet the tests to be considered a curtilage listed building, however, for the avoidance of doubt, listed building consent is being sought for the demolition of the building.
- 1.4. This Planning Statement incorporates a Design and Access Statement and should be read alongside the Heritage Statement accompanying the application which further discusses the significance of the generator building. In addition, the application is also supported by photographs and the following drawings:
 - Application Drawings:
 - Site Location Plan
 - 3392-AS2-PL1 Roof Plan General Arrangement
 - 3392-AS3-PL1 Layout Plan

2. Application Site and Surrounding Area

- 2.1. Tangier Island Water Works contains three operational boreholes along with a filter house building for filtering water extracted from the boreholes on the site before it is pumped to Datchet Water Treatment Works. In addition to the operational filter house building the site also contains two pump house buildings which are Grade II listed. Neither of these buildings are in use. The stand-alone disused generator building the subject of the application, together with associated banded fuel tanks, are located close to the boundary with the Grade II Eton College Park and Garden. The Grade II listed Tangier Mill House is also located close to the entrance to the works.
- 2.2. The site lies to the west of the Eton Conservation Area and within the River Thames Corridor area as shown on the Local Plan Proposals Map. The flood map for planning at www.gov.uk shows the building is located within flood zone 3.
- 2.3. Public visibility of the site is limited with views from the River Thames obscured by vegetation. As a result, views of the site are limited to views from the grounds of the adjacent Tangier Mill House and from Luxmores Garden within Eton College.

- 2.4. The generator building the subject of the application is understood to have been constructed to provide power for the unlisted filter house building and other electric assets on site and as such has no direct functional link with the listed pump house buildings on the site.

3. Proposals

- 3.1. The application is for the demolition of the existing disused generator building. At the same time disused fuel tanks adjacent to the building will also be removed from the site. The building is not listed in itself. However, following correspondence with the Local Planning Authority it was advised that the building would be considered to be curtilage listed and as such listed building consent is required for the demolition of the building.

4. Design and Access Statement

- 4.1. The Planning Practice Guidance sets out that Design and Access Statements (DAS) are required for listed building consent applications. The guidance sets out that a DAS must explain the design principles and concepts that have been applied to the proposed development; and demonstrate steps taken to appraise the context of the development and how the design takes that context into account. The guidance also sets out that DAS's must explain the applicant's approach to access and how relevant Local Plan policies have been taken into account.
- 4.2. The building the subject of the application is located to the east of the Eton Conservation Area boundary and outside of the Green Belt. The site is also to the south of a Registered Park and Garden and is within an area covered by the River Thames Corridor designation. An extract from the Local Plan Proposals Maps is provided in Figure 1 below showing the location of the building.
- 4.3. Policies HE1 and QP4 of the Royal Borough of Windsor and Maidenhead Borough Local Plan are relevant to the proposals. In addition, section 16 of the National Planning Policy Framework which relates to the conservation and enhancement of the historic environment is also a material consideration to the proposals together with guidance issued by Historic England.

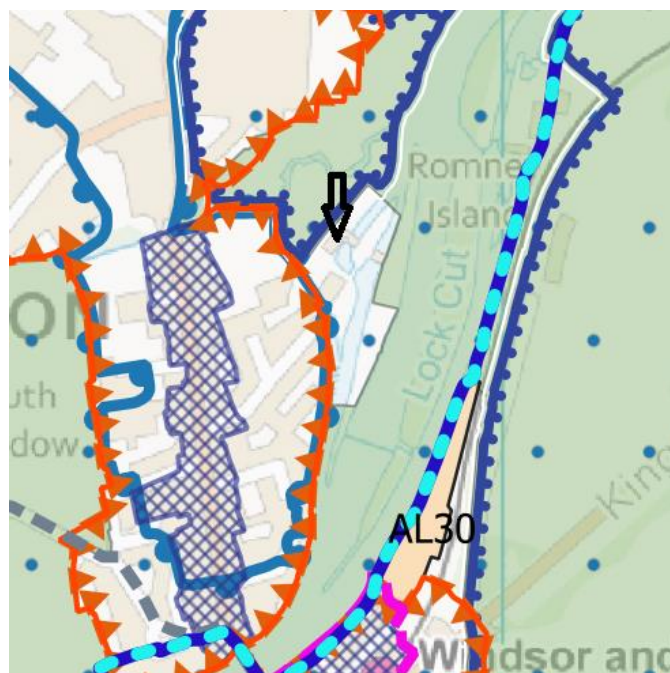


Figure 1: Extract from Local Plan Proposals Map

Design Statement

- 4.4. The building the subject of the application has been redundant since the generators were removed from the building and is in a poor condition. It cannot be left on site in its current condition. The only alternative to the demolition of the building is the repair of the building. Consideration has been given to repairing the building however, it is not considered that this option is the most appropriate solution for the following reasons:
- The structure is in a significantly poor state of repair and repair works would necessitate a large loss of the buildings original fabric in order to leave the building weathertight.
 - There is no use for the building and the building is not in a location where it could be readily made available for alternative uses by third parties due to its siting within a secure water works.
 - The building is considered to have little significance in itself due to its disconnect from the sites primary significance that is associated with the historic interest of the listed pump houses.
 - The design of the building is considered to be poor with tiled, corrugated and concrete roofs and poor quality extensions. Given the poor design quality of the building, restoring the building would continue to detract from the nearby listed buildings and the more architecturally significant filter house building, particularly in views from the Eton Registered Park and Garden (Luxmores Garden).
 - The demolition of the building would open up views from the site across Luxmores Garden towards the Grade 1 listed Eton College and from Luxmores Garden towards the listed pump houses and the filter building.
 - The removal of the building will provide additional space on a constrained operational site which will enhance the ability to park and manoeuvre larger operational vehicles safely on site and provide more space for welfare facilities and laydown areas for any future upgrades or maintenance works.
 - The demolition works will also involve the removal of the associated fuel storage tanks and bunds further improving the appearance of the site.

Policy and Guidance

- 4.5. Policy HE1 relates to heritage and indicates that the loss of heritage assets will be resisted but that where this is proven not to be possible, recording in accordance with best practice will be required. Policy QP4 relates to the River Thames Corridor and states that the special character and setting of the River Thames will be conserved and enhanced. The policy goes on to state that, where appropriate, development proposals will be required to protect and conserve buildings that are associated with the Thames and its history and setting.
- 4.6. Section 189 of the National Planning Policy Framework (NPPF) states that heritage assets should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
- 4.7. Section 197 of the NPPF states that in determining applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation and the positive contribution that conservation of heritage assets can make to sustainable communities including economic vitality. Section 202 of the NPPF goes on to state that where a development proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

- 4.8. Historic England guidance in relation to curtilage buildings states that in general, any pre-1948 structure that formed part of the land and was in the curtilage of the principal listed building at the date of listing and is ancillary to the principal building is considered to be part of the listing. Further Guidance on Listed Buildings and curtilage is provided within Historic England Advice Note 10. This indicates that the curtilage of a building (the principal building) is in general terms, any area of land and other buildings that is around and associated with that principal building. It goes on to state that the courts have said there are three key factors to take into account in assessing whether the structure or object is within the curtilage of a listed building:
- The physical layout of the listed building and the structure;
 - Their ownership, both historically and at the date of listing; and
 - The use or function of the relevant buildings, again both historically and at the date of listing.
- 4.9. The guidance states that a building within the curtilage may have its own special architectural or historic interest or may contribute to the special interest in the principal building as part of the group. It is also stated that it is possible that a curtilage building holds no special interest and so, even if its within the curtilage, works to it or even its demolition will require no consent.

Assessment

- 4.10. The Heritage Statement confirms that the generator building was constructed around the same time as the filter house building on the site with both constructed between 1915 and 1923. It is understood to have been used to power the filter house building and associated plant and machinery. As such the building has no functional link with the listed pump house buildings on the site.
- 4.11. The building was not individually listed when the pump house buildings were listed in 1981 and is not referred to in the listing description of the pump house buildings. In addition, the building is not known to be included on any local list. Given the absence of a functional link between the generator building and the listed pump house buildings it is considered that the buildings may not be viewed as meeting the tests for curtilage listed buildings in which case consent for the demolition of the building would not be required. Notwithstanding this, for the avoidance of doubt, consent is being sought for the demolition.
- 4.12. As set out in the Heritage Statement, the building has been subject to various alterations since it was originally constructed and is in a poor condition. The building is not considered to have any particular architectural significance with its design being functional. The Heritage Statement concludes that to have limited significance in of itself.
- 4.13. While the demolition of the building will result in the total loss of the building when viewed individually, the harm to the heritage asset as a whole, being the listed pump houses and their curtilage, is considered to be less than substantial. The building has no functional use and is not in a location where it can reasonably be put to any alternative use given the siting within a secure water works site. The proposed demolition is considered to result in less than substantial harm and its demolition will improve the setting of the listed pump house buildings on the site and the views between Eton College, Luxmores Garden and Tangier Island Water Works. Furthermore, the retention of the building would not provide any meaningful contribution to the quality of life of existing or future generations.
- 4.14. The site is screened from view from the River Thames but contains two listed pump houses which historically were used to pump water from wells on the site for use in Eton. The building itself was ancillary to the filter house building and as such the building provides a limited contribution to the history of the River Thames.

- 4.15. Overall, given the limited significance of the existing building and the improvements that will arise to the setting of the primary listed buildings on the site and the other nearby listed buildings, the proposals are considered to comply with Policies HE1 and QP4 of the Local Plan and the NPPF.

Access Statement

- 4.16. The proposed works will result in the removal of an existing disused building on an operational site. The removal of the building will provide more space for parking and manoeuvring operational vehicles on site helping to improve operational working and providing more space on a constrained site for any temporary facilities required on site in connection with future maintenance works or upgrades at the site.

5. Conclusion

- 5.1. Although it has been indicated by the Council that the demolition of the building requires listed building consent as a curtilage listed building, the Heritage Statement accompanying the application demonstrates that there is no functional link between the generator building and the listed pump houses on the site. As such the status of the building as curtilage listed is not certain and a case could be made that listed building consent is not required. Notwithstanding this, the application has been progressed for the avoidance of doubt.
- 5.2. The building is assessed as having limited significance and looking at the buildings on the site as a whole, the demolition of the building will result in less than substantial harm to the heritage asset with the proposed demolition resulting in improvements to the setting of the listed pump house buildings and other nearby listed buildings. The proposals are considered to comply with national and local policy and guidance and as such consent for the demolition of the building should be granted.

