



GLIAS

President: John H. Boyes FSA
Vice-President: Dr. Denis Smith

Company No. 5664689 England
Charity No. 1113162

Greater London Industrial Archaeology Society

Please reply to : MT Tucker, 9 Blythwood Road, London N4 4EU, tel 020 7272 7160

The Borough Planner
Wandsworth Borough Council
Town Hall
London, SW18 2PU

30 Sept 2010

BY E-MAIL

For the attention of Mr Bob Leuty

Your Ref: 2009/3578

Dear Sirs,

**Battersea Water Pumping Station, Cringle Street, London SW8.
Listed Building Demolition Application No. 2009/3578,
Planning Policy Statement 5 Assessment**

We wrote to you on 30th January 2010 objecting to the proposed demolition of the Battersea Waterworks pumping station building. This letter is in response to the recently circulated Planning Policy Statement 5 Assessment, prepared by Donald Insall Associates Ltd and dated September 2010.

We note that their arguments for demolition of the building centre on PPS5 Policy HE9.2, and on the wording of listing description and the stated conclusion of the CgMs report that the building has 'limited architectural, artistic or archaeological significance'. We believe that the building does have architectural and archaeological significance and that its demolition would deny future generations an appreciation of the transition of the Cornish engine from mine pump to waterworks engine. Further, we point out below that it should be possible to incorporate the conserved building within the scheme.

We may add that since CgMs prepared their Historic Building Record in 2005, the original drawings and other records of the building have been studied in detail by Colin Thom of EH Survey of London, corroborating and expanding upon this society's own researches.

1) Function and fabric as contributors to the significance of the building.

1.1) We find that the Assessment largely misses and misunderstands the building's significance. These problems start with section 2.2.2. While we agree with CgMs's chronology of the surviving built fabric, the preceding paragraphs describing the history of the building and its engines are short on relevant detail (and also partly inaccurate). Nowhere is it mentioned that the building was built to accommodate beam engines, particularly those built on the Cornish principle, i.e. the very distinctive devices used for water pumping from this period, nor

that this building represents a point of major change in waterworks practice. Neither here nor elsewhere does the Assessment explain that the larger engine of 1840 (in Bay B) was the first Cornish engine to be purpose-designed for waterworks use nationally, and therefore it carried forward the arrangement, used in mine pumping engines, of mounting the pivot of the engine beam on a heavy masonry wall (the bob wall) across the engine house. The arrangement was repeated in Bay C and Bay D - the massive arched bob wall remains in situ in Bay C, while in B and D their former locations are marked by stucco covering the scars where the walls have been removed. The bob walls were built integrally with the house, (in the case of Bay C some years in advance of the installation of the engine), so the architecture and the engineering were intimately related, and the building was constructed of corresponding massiveness

1.2) Section 2.3.1 contains long descriptions of architectural features but nowhere are these correlated to significance, so that the narrative serves to distract rather than to enlighten. In contrast, the "features and scars of features associated with its original ... use" are not considered at all. (There is one exception, the identification of rendered patches marking the site of the bob wall in Bay D – yet the formal pilaster strips that provide corresponding evidence in Bay B are not mentioned). Such archaeological features, including the unusual metal beams that provided support to parallel motion gear in Bay B, contribute much to site interpretation and understanding and should not be ignored. While the narrative does describe the wrought-iron roof trusses of B and C with their unusual flat-bar principal members, the fact that that these roofs are now very rare representatives of an important early roof type is not brought out.

1.3) The appraisal does not touch upon the now-hidden features below the present floors. Archaeological exploration was outside the brief of CgMs, but thereby very significant aspects of the building have been excluded from the appraisal. The massive beds on which cylinders were mounted, the pits to accommodate pumps and condensers and, outside the south wall, the foundations for the huge standpipes, will almost certainly remain undisturbed below 20th century fill, demonstrating the layout of the equipment and with potential for display (except perhaps under B, if affected by the 20th-century basement there). These are all parts of the building that contribute to its significance.

2) Assessment of architectural significance

2.1) The archaeology of the Cornish engine as a mine pump is served well by the engine houses of Cornwall, their significance being recognised by the inclusion of many in the Cornwall and West Devon Mining Landscape World Heritage Site. Examples of the Cornish engine as later further adapted for waterworks use can be seen at Kew Bridge Steam Museum. But only at Battersea can the transitional stage be seen.

The Battersea engines were 'house built' engines, derived from the mine pumping examples in Cornwall. That is, the engine house itself was part of the engine. Without the building the engine could not function, while the building's layout and construction was intimately related to the engine.

In the Statutory Criteria for Listing, as given on the DCMS website http://www.culture.gov.uk/what_we_do/historic_environment/3330.aspx, under "Architectural Interest", it is stated:

"Special interest may also apply to:

- nationally important examples of particular building types and techniques, for example buildings displaying technological innovation or virtuosity
- significant plan forms"

The arrangement (including plan form) of the Battersea engine house thereby comes within architectural interest. It represents a critical transitional phase historically and as the major and sole-surviving example of the form this is a nationally important example of the building type.

2.2) Additional architectural interest derives from the two different styles of iron roof in Bays BC and D, which this writer recognizes from his specialist research as rare survivals of important and once widespread early industrial roof types. Insofar as contemporary records of such structures only occasionally survive, these roofs also have archaeological interest.

2.3) The listing description notes "historic and technical interest". We see the historic interest as lying in the prominent part that this building and its engines played in the development of water supply in London and thereby nationally. We take "technical" in this context to mean "technological", relating to many of the points of our preceding discussion. We see no grounds for relegating "historical significance" to a subsidiary role, while we consider the building's architectural significance is considerably greater than the Assessment has portrayed.

3) Significance of artefacts

3.1) The Assessment, in section 4.0, suggests that the building's "technical and historic interest" can be "satisfactorily preserved" by salvaging certain elements. This is mistaken. While the selected artefacts are certainly of interest – some very distinctive and rare – the building's interest as a whole does not reside in them and they each represent only small aspects of that interest.

3.2) The list of various items worthy of salvaging was drawn up by GLIAS but only as a last resort should the building be demolished. The artefacts will lose much of their value if removed from the context of the engine-house bays in which they are housed. They will then have limited interpretative value. There are also questions of how they may best be displayed and, if donated to a museum, how that display may be financed.

4) Structural condition

4.1) The building was in quite good structural condition when GLIAS visited the site in 1991 and most roof coverings were largely intact in 2002. The main structure is very robustly constructed, as the report acknowledges, and without use of timber in the roofs of Bays B, C and D. We would guess that the "fallen roof structures" referred to in 2.3.1 paragraph 1 are confined to parts of the

lantern of Bay A, although timber floors in Bay B could also be in poor condition now.

4.2) Despite the description "very bad" in the Buildings at Risk Register, we therefore suspect that the condition may not be so poor as might be inferred from the Assessment.

5) Accommodating the building within the development

5.1) The footprint of the building is less than 450 sq.m. – a small proportion of the 20.9 hectare site area. The 43,200 sq.m. figure for development area lost is presumably the accommodation within buildings that would be displaced within the cited 30 metre exclusion zone drawn around the building, based on a layout that has clearly been drawn up presuming the building's demolition and making no adjustments to accommodate it.

5.2) We do not see that a 30 metre exclusion zone (as provided around the Power Station) is needed here, except on the main southern frontage. On one or more sides the separation could be quite small if that made the difference between the life and death of the building.

5.3) As it happens, the building nearly all lies within the courtyard of Zone RS-2. Its western bay would protrude slightly into the rear of the major range on the western side of the zone, but the corresponding layout in Zone RS-1 shows that this range does not have to be built at a constant depth. The different character of the later western wing could itself contribute towards the separation of the the main block of the engine house from the new buildings on that side. The range shown on the south side of Zone RS-2 would be principally affected, but replanning there would be beneficial in relieving the monotony of the canyon-like frontages of the proposed development.

5.4) We believe that if demolition of the pumping station were refused, then further adjustments could be made to the development layout to minimise any loss of development space.

6) Conclusion

We urge you to reject the application to demolish the Battersea Waterworks pumping station building.

Yours faithfully

Malcolm T Tucker

MA CEng MICE, Engineering Historian
for the Greater London Industrial Archaeology Society