

MEMORANDUM

From:	Built Heritage Officer		
Service	Green Infrastructure	App No:	252695
Address:	Harrison Almshouses, London Road, Twyford, RG10 9EX		
Proposal:	Application for Listed Building consent for the proposed removal of existing boiler units and installation of new gas boilers and flues with associated works at nos. 2, 3, 4 and 5.		
Heritage Asset:	The Harrison Almshouses – Grade II* listed building status since 1952. Twyford Conservation Area. Listed Buildings along with Conservation Areas are classed as designated heritage assets under the NPPF and in the Council’s Local Plan policies		
Site Visit Made:	23/04/26		

Summary Of Recommendations

The proposed gas flue will have a detrimental visual impact and in the case of the level flue and condensate pipe through the back of the fireplace of Apt.5 will result in a small loss/alteration of historic fabric.

Were electric water heaters to be used avoid the need for the intended flues. This has not been shown not to be an option (due it is understood to cost for residents)

The visual and physical impact of the proposal harm to the designated heritage asset would amount to less than substantial harm. As such, in accordance with the NPPF paragraph 215 should the public benefit be considered to outweigh the level of harm, and consent to be given then it is advised that be subject to the attached suggested conditions.

There is a need for the existing level flue to be removed or for it to be regularised.

Comments On Proposal

Changes to the regulations for domestic gas boilers has resulted in a need for the trustees of the historic almshouses to ensure their tenants have compliant gas boilers systems (including flues), with four of the five residential apartments, created in the originally eight celled historic Harrison Almshouses complex, needing to have their gas boiler and flue replaced.

With respect to the fifth residential apartment (No.1) within the almshouses, which is situated to the right of the London Road entrance passageway, this does not form part of this application and is noted a level gas flue installed through the back of the fireplace/chimney breast has been (see Google Street View images) installed at some point between March 2009 but before March of the following year. No application or record for listed building consent has been found. As such, the flue to apartment 1 is unauthorised works undertaken without the benefit of consent.

It is understood from a previous pre-application meeting with one of the trustees for almshouses that the new gas boilers are to replace the existing, in the same location and without any alterations within the apartment other than the need for a new flue for the gas boilers, which other than with apartment no. 5 are to be routed through the roofs (courtyard facing roof slope). It having been stated at the time of pre-application meeting in September 2024 that new level flues through the external walling adjacent to the location of the gas boilers were being sought to comply with changes in the regulations. At the time of the pre-application meeting the trustee envisage the new level gas flues to be routed through the exterior walling, which as would be required with the intentions for these to be installed.

At the time of the pre-application meeting on site the option of having electric water heaters was discounted due to envisioned high running cost for the low income/funds residents of the apartments.

It is noted that present all four of the apartments the subject of this application has a gas fire and back boiler situated in the fireplace of each apartment. In the case of apartments 2, 3 and 4 the intention is for new gas boiler to be located elsewhere in each apartment, most commonly by the apartment's hot water tank, with the fireplace opening to be covered over. Given the intended removal of the gas fire raises the question as to how these apartments are to be heated as there is no forthcoming details and no indication of any other internal works?

In the case of apartment 5, the new gas boiler is to be where the present back boiler is in the fireplace and have a level flue and according to the Schedule of Works a condensate pipe (the size and location of which has not been stated by the applicant). This flue location requires the loss of a small area of historic brickwork to install the flue, which given its location will have a visually harmful impact.

Under paragraph 213 of the NPPF (Dec 2024) states that in the case of designated heritage assets of the highest significance, which includes grade II* listed buildings, any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification, and substantial harm to or loss should be wholly exceptional.

At this stage it is believed further details are necessary response to the questions raised.

Additional Remarks

Further remarks in light of re-reading of the submitted application information:

- Schedule of Works – refers to a condensate pipe required for each of the

new gas boilers along with a new flue pipe, with diameter stated for the condensate pipe. In the case of apartments 2, 3 and 4 the condensate pipe would link to the run out of the kitchen sink. This seemingly requires routing the condensate pipe through internal walls although the internally walls are believed not to hold any great historic value. In the case of apartment 5, the condensate pipe is to be route through the exterior wall/back of the fireplace to drain into the adjacent flower bed. Given the diameter and location for this condensate pipe is not stated it is prudent to condition these details, including the manner in which the hole through the brickwork is to be formed.

- Roof Gas Flue Vents – as the submitted proposed elevation plans, with enlarged flue extract detailing are annotated to show the flue depicted as a ‘Typical Detail’ – given there is a degree of ambiguity and uncertainty as to what is actually is to be installed, as such it is prudent for details of the actual roof mounted flues to be used to be conditioned.
- Gas supply pipework routing – whilst the application appears to make no reference to any gas supply pipework on the exterior of the almshouses being require. Recent experience (and as I recall is the case of apartment 1) new supply pipework is routed on the exterior. From a heritage and aesthetic stance such external pipework is quite likely to be detrimental in this courtyard setting and as such is expected to be avoided.

Conditions

CM8 Method statement – Holes Through Masonry *

The works hereby approved to install a replacement gas boiler and flue for Apartment 5 shall not commence until a method statement for the formation of the holes through the brickwork for of the level flue and for the condensate pipe outlet has been submitted to and approved in writing by the local planning authority. The details shall confirm the diameter and location on the brick chimney breast where the holes are to be formed. The formation of the holes through the brickwork of the chimney breast shall then be implemented in accordance with the details so-approved.

CN2 Matching finishes

All new works and works of making good to the retained fabric, whether internal or external, shall be finished to match the adjacent work with regard to the methods used and to material, colour, texture, and profile.

Roof Gas Flue Details *

Notwithstanding the details submitted, no works to have installed the roof mounted gas flues until details for the flues have been submitted to and approved in writing by the local planning authority. Details will confirm the dimensions (diameter & height, finish colour, and any required additional weather/leaf guard).

External Pipework *

Notwithstanding the details submitted no additional gas pipework other than that which presently already installed shall be added to the exterior of the almshouses, unless otherwise agreed in writing by the local planning authority prior to the installation of the pipework.

Reason: In order to safeguard the special architectural or historic interest of the building. Relevant policy: National Planning Policy Framework Section 16 (Conserving and Enhancing the Historic Environment) and Managing Development Delivery Local Plan policy TB24

*** Additional and/or revised conditions**

Date:	19/05/26 As Amended 04/06/26	Signed:	Keith Frost Built Heritage Officer
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