

**Pinner Service Station
High Road Eastcote
Pinner
Middlesex
NGR: TQ 10402 88489**

**A
Heritage Impact Assessment
of a
New Pressure Wash**

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Summary

What is now the Pinner Service Station on High Road Eastcote, between Pinner and Ruislip, was established by the 1950's and has been continuously updated and remodelled. There are proposals to add a jet-wash facility to the rear of the forecourt. Because it is within the Eastcote Village Conservation Area and within 500m or so of several listed buildings, the local planning authority requested a full heritage impact assessment of the proposals. This Consultancy was commissioned to undertake the work. The report concludes that the proposals will have no impact on the character, setting and significance of the conservation area, and adjacent heritage assets and adjacent conservation areas. It will not cause any 'harm' as defined by the NPPF and none of the relevant paragraphs within that document will be engaged.

1. Introduction

The Pinner Service Station on High Road Eastcote, in the historic county of Middlesex, was established as a garage and filling station by the 1950's to serve the then rapidly growing suburban developments in the area. Proposals have been made for a new pressure wash facility on the rear boundary of the forecourt.

The site is within the Eastcote Village Conservation Area and there are several listed buildings within 500m or so of the site. Consequently the local planning authority – the London Borough of Hillingdon – have requested that a heritage impact assessment accompany the planning application.

Under the guidelines of the government's *National Planning Policy Framework* this consultancy was commissioned to produce the necessary a Heritage Impact Assessment to assess the possible impact of the proposals on the designated and non-designated heritage assets in the vicinity.

This report, part of a suite of reports accompanying the planning applications, is not concerned with other planning issues. The work, undertaken in February 2021, was carried out entirely within the public domain and within the site and adhered to the ongoing Covid-19 protocols.

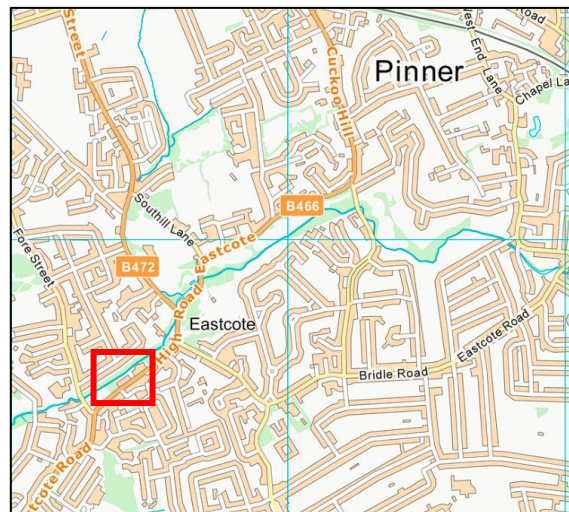
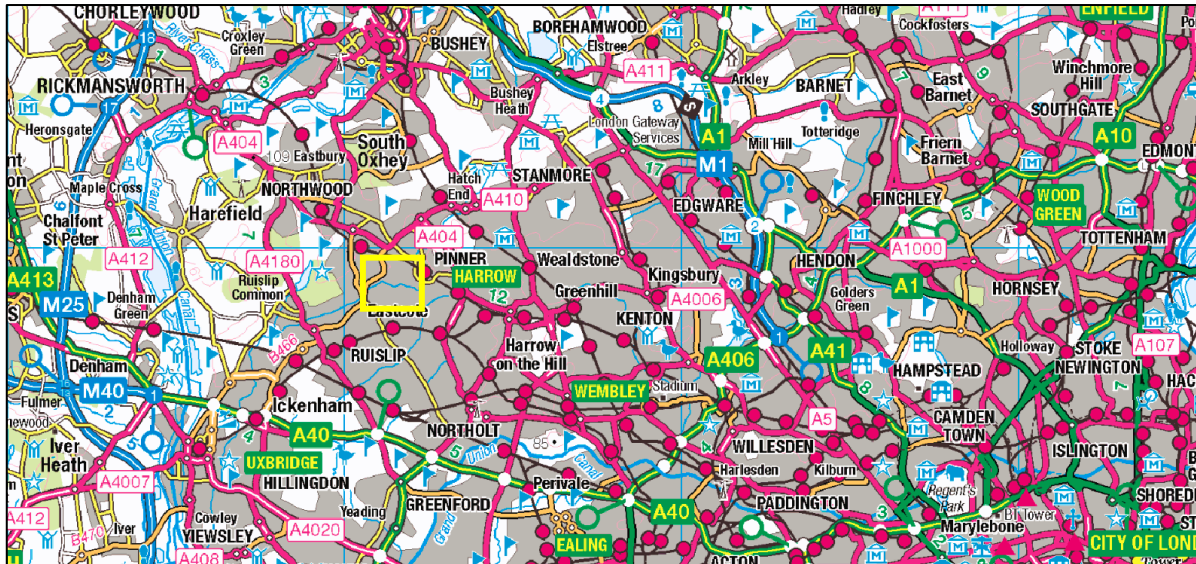


Fig.1: Location plan.
(Ordnance Survey OpenData, top, and Adcock Associates)

2. Planning Guidelines

2.1 The National Planning Policy Framework

Planning law relating to listed buildings and conservation areas is set out in the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 66 of the Act deals with the responsibilities of local planning authorities – the decision makers - when dealing with planning applications that could impact on heritage assets and 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’.*¹

Section 72 of the same Act states that, in relation to conservation areas:

*‘with respect to any buildings or other land in a conservation area, of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area’.*²

Government guidelines regarding the listed buildings and conservation areas legislation in the 1990 Planning Act changed twice in two years, resulting in the introduction of a new *précis* of planning guidance published in March 2012 – the *National Planning Policy Framework* (NPPF) – which replaced all other separate *Planning Policy Guidelines* and *Planning Policy Statements*.³

A revised version was published in July 2018 and yet another a few months later in February 2019.⁴ The glossary of the NPPF described ‘heritage assets’: The main relevant paragraph in the NPPF states that local planning authorities should require applicants:

*‘...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 proposals on their significance’.*⁵

¹ Planning (Listed Buildings and Conservation Areas) Act 1990 c.9 section 66 (1), 41

² *Ibid.* section 72

³ Department for Communities & Local Government, 2012, *National Planning Policy Framework*.

⁴ Ministry of Housing, Communities & Local Government, 2019, *National Planning Policy Framework*

⁵ *Op. cit.*, para. 189

3. Heritage Impact Assessments

3.1 General Introduction

The purpose of a heritage impact assessment (HIA) is to meet the relevant guidance given in the NPPF. This outlines the need to inform the planning decisions when considering proposals that have the potential to have some impact on the character or setting of a heritage asset. It is not concerned with other planning issues.

The nature of the heritage assets and the potential impact upon them through development are both very varied. The heritage assets include both designated heritage assets – such as listed buildings, scheduled ancient monuments and conservation area – and non-designated heritage assets, a rather uncomfortable and sometimes subjective category that includes locally listed buildings, field systems, buried archaeological remains and views.

The degree of impact a development could have on such assets is variable and can sometimes be positive rather than negative. The wide range of possible impacts can include loss of historic fabric, loss of historic character, damage to historic setting, and damage to significant views.

Under the requirements of the NPPF and of other useful relevant guidance, such as English Heritage's *Conservation Principles* and *Informed Conservation*, and recent material from the newly formed Historic England, the process of heritage impact assessments can be summarised as involving three parts:

1. understanding the heritage values and significance of the designated and non-designated heritage assets involved and their settings;
2. understanding the nature and extent of the proposed developments;
3. making an objective judgement on the impact that the proposals outlined in Part 2 may have on the information outlined in Part 1.⁶

3.2 Definition of Setting

Setting, as a concept, was clearly defined in PPS5 and was then restated in the NPPF which describe it 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.’

⁶ English Heritage, 2008, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment*; Clark, K, 2001, *Informed Conservation*

The latest version of the Historic England guidance on what constitutes setting is virtually identical to the former English Heritage guidance:

‘Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated. Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance.’⁷

The new Historic England guidance also re-states the earlier guidance that setting is not confined entirely to visible elements and views but includes other aspects including environmental considerations and historical relationships between assets:

‘The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each. The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance’.⁸

In terms of the setting of heritage assets the approach is the same but the latest Historic England guidance - *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3* (GPA3) of 2017 - suggests a five-step approach.⁹ The steps are:

- Step 1: identify which heritage assets and their settings are affected;
- Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
- Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;
- Step 4: explore the way to maximise enhancement and avoid or minimise harm;
- Step 5: make and document the decision and monitor outcomes.

⁷ Historic England, 2017, *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning: 3* (2nd ed.), para.9

⁸ *Op.cit.*, Part 1, reiterating guidance in the PPG of the NPPF.

⁹ *Op.cit.*, para.19

3.3 Definition of Significance

The *Planning Practice Guidance* (PPG) to the NPPF defines significance as:

‘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’.

The PPG also states that:

‘Local planning authorities may identify non-designated heritage assets. These are buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets. In some areas, local authorities identify some non-designated heritage assets as ‘locally listed’’.¹⁰

but cautions that:

‘A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage interest for their significance to be a material consideration in the planning process’.¹¹

3.4 Definition of Harm

Current guidance by Historic England is that ‘change’ does not equate to ‘harm’. The NPPF and its accompanying PPG effectively distinguish between two degrees of harm to heritage assets – *substantial* and *less than substantial*. Paragraph 195 of the revised NPPF states that:

‘Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable use of the site; and*
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d) the harm or loss is outweighed by the benefit of bringing the site back into use’.¹²*

¹⁰ Planning Practice Guidance, 2014, paragraph 39

¹¹ *Ibid.*

¹² Ministry of Housing, Communities & Local Government, 2019, *op. cit.*, para.195

Paragraph 196 of the revised NPPF states that:

‘Where a development proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposals including, where appropriate, securing its optimum viable use’.

Recent High Court rulings have emphasised the primacy of the 1990 Planning Act – and the fact that it is up to the decision makers in the planning system to *‘have special regard to the desirability of preserving the [listed] building or its setting’*.

As stated by HH Judge David Cooke in a judgment of 22 September 2015 regarding impact on the setting of a listed building:

*‘It is still plainly the case that it is for the decision taker to assess the nature and degree of harm caused, and in the case of harm to setting rather than directly to a listed building itself, the degree to which the impact on the setting affects the reasons why it is listed’.*¹³

The judgment was agreed by Lord Justice Lewison at the Court of Appeal, who stated that:

*‘It is also clear as a matter both of law and planning policy that harm (if it exists) is to be measured against both the scale of the harm and the significance of the heritage asset. Although the statutory duty requires special regard to be paid to the desirability of not harming the setting of a listed building, that cannot mean that any harm, however minor, would necessarily require planning permission to be refused’.*¹⁴

¹³ England & Wales High Court (PALMER, R v DAVENPORT (t/a Foxley Estates) & ORS) (EWHC 2688 (Admin)) para 61.

¹⁴ Court of Appeal (PALMER and HEREFORDSHIRE COUNCIL & ANR) in 2016 (Case No: C1/2015/3383) para.34.

4. Setting and Outline History

Pinner Service Station lies on the High Road, Eastcote, now a suburban village between the larger settlements of Pinner to the north-east and Ruislip to the south-west. The garage and forecourt occupy a narrow site between the High Road and the diminutive River Pinn to the north.

At this point the river runs in a virtual straight line through straight-edged woodland parallel to the High Road to the south and Mount Park Road – the southern end of a large housing estate – to the north. On the south side of the High Road is more suburban housing, built from the end of the 1960's onwards interspersed with a few older properties along the roadside.

The site is, historically, within the parish of Ruislip and the name 'Eastcote' is probably derived from the fact that this was the site of an 'east cot, or cottage' within the eastern part of Ruislip parish.

The area was a fairly undeveloped part of the historic county of Middlesex until the mid-20th century, as indicated on historic mapping up until that period. However, the much altered Old Barn House on the south side of the road a little over 100m from the service station has at its core a late-medieval timber-framed hall house.

There were a few large country houses in the area, including Haydon Hall – also sometimes known as Eastcote Park - which was built around 1630 for the Dowager Countess of Derby. The house was extended in the mid-1860's by its then owner, Lawrence Baker, and new workers' cottages designed by Harold Peto and Ernest George were added in the estate as well as Eastcote Lodge, built for his Baker's son and his new wife, Helen, who was Peto's sister. This was on the south side of the High Road, immediately opposite the present service station.

The impact of new railways in the area, especially a branch of the Metropolitan Railway in 1904, increased the pressure for the suburban development of the area but this only really started in earnest after the Second World War. During the war a large hospital complex had been built to the south of the High Road but used mainly for other military purposes, including as an outstation for Bletchley Park. This was largely demolished after being sold for redevelopment in 2007.

Previously, Haydon Hall, Eastcote Lodge and another large property, Eastcote House, had all been demolished in the 1960's. The site and grounds of the Lodge were redeveloped for housing in a neo-Georgian manner. The area on the north side of the River Pinn had already been developed for housing by that time, but development between it and the High Road had been relatively limited – although the mapping shows it had been partly divided in anticipation of such development.

The service station seems to have been built as a consequence of the large scale suburban development all around it, and its position on the High Road between Pinner and Ruislip. It first appears on Ordnance Survey maps of the 1950's. The parameters of the complex have changed little since then, though its layout has.

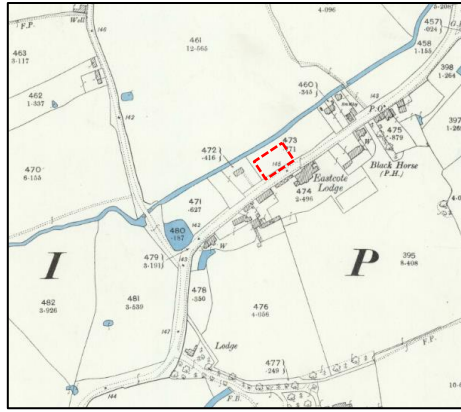


Fig.2: Extract from the 2nd edition of the 1:2500 Ordnance Survey map revised in 1894.

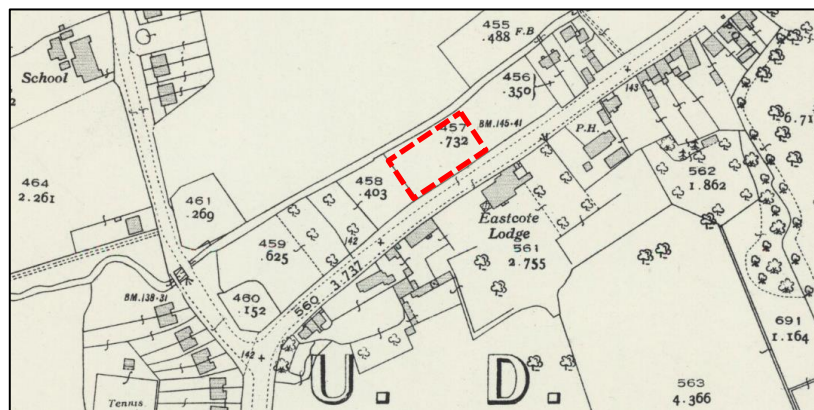


Fig.3: Extract from the 1:2500 Ordnance Survey map revised in 1935.



Fig.4: GoogleEarth © image of the service station and surroundings.

5. Description

The service station occupies a roughly rectangular site between the High Road to the south and a tree belt bordering the side of the River Pinn to the north. Most of the area is laid to hardstanding but with grassed verges on three sides, trees to the north hand west, and hedgerow or shrubs to the rear of the rectangular single-storey brick-faced forecourt shop is at the eastern extremity of the site. A rectangular forecourt canopy set back from the road shelters the two parallel pump islands.



Pl.1: The service station from the High Road; note houses glimpses through trees to rear.



Pl.2: View east through the service station to the forecourt shop.



Pl.3: The proposed location of the jet wash (arrowed) as seen from the High Road.



Pl.4: The proposed site looking west from within the forecourt area.

7. Heritage Impact Assessment

7.1 Impact on Heritage Assets Within the Proposed Development Site

There are no designated or non-designated heritage assets within the proposed development site.

7.2 Impact on Adjacent Designated Heritage Assets

There are a few Grade II listed buildings within 500m of the service station, including the Old Barn House already mentioned above, over 100m to the east and on the south side of the High Road. Also on the south side of the High Road and approximately 60m from the nearest boundary of the site are two more – the early-19th century Black Horse Inn to the east and the 18th and 19th century Flag Cottage to the west.

The service station clearly plays no part in the significance of the settings of any of these listed buildings, and the proposed jet wash is sited to the rear of the site and there are no views of it from any of these listed buildings. Therefore there would be no impact at all on their character, setting or significance.

7.3 Impact on the Conservation Area

The site is within the boundaries of the linear western extension of the Eastcote Village Conservation Area – the boundaries in this section including the buildings, old and new, immediately to the south of the High Road and the valley of the Pinn as far north as the backs of the gardens of the suburban housing on the north bank. It was first designated in the early-1970's and has been extended several times – in 1898, 1999 and 2010.

Conservation areas, first created in 1967, are designated heritage assets under the auspices of the National Planning Policy Framework and have been protected – with a varying degree of success - from the adverse impact of unsuitable development through the passing of various planning Acts, the last being the consolidation Planning Act of 1990.

The relevant Historic England guidelines notes that:

'Section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places on local planning authorities the duty to draw up and publish proposals for the preservation and enhancement of conservation areas in their districts. Regularly reviewed appraisals identifying threats and opportunities can be developed into a management plan, which can in turn channel development pressure to conserve the special quality of the conservation area'.¹⁵

¹⁵ Historic England, 2016, *Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1*, para.22



Pl.5: View from in front of the Black Horse Inn towards the service station, on the right.



Pl.6: View east from Flag Cottage (right) towards the service station, on the left.



Pl.7: General view east from the garage (left) showing later-20th century housing, right.

The character of such an extensive area is necessarily varied but as summarised in the local authority's leaflet on the Conservation Area, *'Overall, the character of the area is that of a high quality suburb dominated by open spaces, extensive natural landscaping and trees'*.

This assessment does apply to the area immediately adjacent to the service station – though it is clear that neither the service station itself nor the row of shops to the east make positive contributions to the character of the conservation area. However, both pre-date the designated of the conservation area.

The increasing amount of cars on the roads in the early-20th century led to the inevitable need for a new type of roadside facility – the petrol filling station – which, by its very non-traditional nature was difficult to fit easily into either the town or country settings needed.

As organisations such as the Council for the Protection for Rural England found when trying to resist the spread of inappropriate designs of garages in the countryside between the world wars, it is very difficult to 'hide' such key facilities them without resorting to pastiche designs that were often quite inefficient.

Whilst the numbers of roadside garages have declined – due in large part to the price-cutting of the superstores – the facilities that the remaining ones offer have evolved to ensure their long-term viability, resulting in the establishment of larger forecourt shops and of other motor related features, such as jet washes.

This proposal is for a jet wash in the rear corner of a forecourt of the service station. It is accepted that there is an impression of a rather permeable boundary between the forecourt and the tree cover adjacent but in a sense this results in an ill-defined distinction between the garage and the woodland – with the necessary ephemera of the facility spaced out along the boundary.

The jet-wash would introduce a slight visual change in the appearance of the area and a slightly more focussed boundary. The jet-wash itself does not, of course, cross over the boundary into the trees and thus has no direct impact on the woodland or the appreciation of the woodland; the very limited impact is visual, and within the context of the existing appearance of the garage forecourt.

The visual impact in relation to the trees behind will change with the seasons, given the fact that most of the tree cover is deciduous; in the winter it is possible to see the rear of the houses on the opposite bank of the Pinn (see Pl.1) which contrasts with the situation in the summer (see Pl.3).

Whilst it is accepted that the service station is, almost inevitably, a negative contributor to the general character of the conservation area, it is considered that the limited visual change resulting from these proposals will not exacerbate that situation and will not alter the overall impact that the garage presently has on the conservation area. The service station pre-dates the designation of the conservation area and has been an important facility for the local area for well over 60 years.



Pl.8: View south from the proposed site of jet-wash to later-20th century housing.



Pl.9: Existing garage paraphernalia along the rear boundary of the forecourt.

7.5 Archaeological Issues

The service station lies within the designated Eastcote Village Archaeological Priority Area. However, no significant groundworks are anticipated in the proposal on what is already a developed site with hard-standing over substrate and it is considered that there is no potential for any archaeological impact.

8. Conclusions

The proposals for the jet wash fit into the overarching strategy of the National Planning Policy Framework – specifically that:

Para 80. Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

and:

Para 85. Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:

a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;

Additional appropriate facilities are of particular importance in relation to petrol filling stations, especially in urban areas, where they need to be able to meet local needs. The issues regarding the ‘different-ness’ between garages and their surroundings have been debated for over a century and was a particular important element in improving the architectural quality of rural garages in particular.

It is not claimed that the present petrol filling station makes a positive contribution to the character and significance of the conservation area, or that the proposed jet wash will; the garage clearly does not, and it would be very difficult for any such garage to do so because of their requirements in terms of design, facilities, equipment and, last but by no means least, road safety aspects regarding access and egress with appropriately visibility splays and advertisements.

However, there has been a garage on this site since at least the 1950’s and it thus long pre-dates the designation of the conservation area. It is the potential additional impact that this specific proposal for a jet wash could have on the conservation area and any adjacent heritage assets that is important to address.

For the reasons outlined above, it is suggested that the proposed jet wash will not be dominant within the forecourt and is set well back to the rear of the site, with the much taller tree cover as a background. Whilst it is acknowledged that setting is not confined to views, this location to the rear of a long-established garage forecourt is such that it will have no additional impact on the character, setting or significance of any adjacent heritage assets.

It was made clear in one of the key High Court judgements, by Lord Bridge, related to developments within conservation areas, *South Lakeland District Council vs. Secretary of State for the Environment*, that whilst all developments within a conservation area ‘must give a high priority to the objective of preserving or enhancing the character or appearance of the area’ where a development would not have any adverse impact and met other planning requirements:

*‘.... One may ask rhetorically what possible planning reason there can be for refusing to allow it. All building development must involve change and if the objective of Section 277(8) [of the 1971 Planning Act, substantially the same as Section 72(1) of the 1990 Act] were to inhibit any building development in a conservation area which was not either a development by way of reinstatement or restoration on the one hand (‘positive preservation’) or a development which positively enhanced the character or appearance of the area on the other hand, it would surely have been expressed in very different language...’*¹⁶

¹⁶ 1992, *South Lakeland District Council vs. Secretary of State for the Environment*

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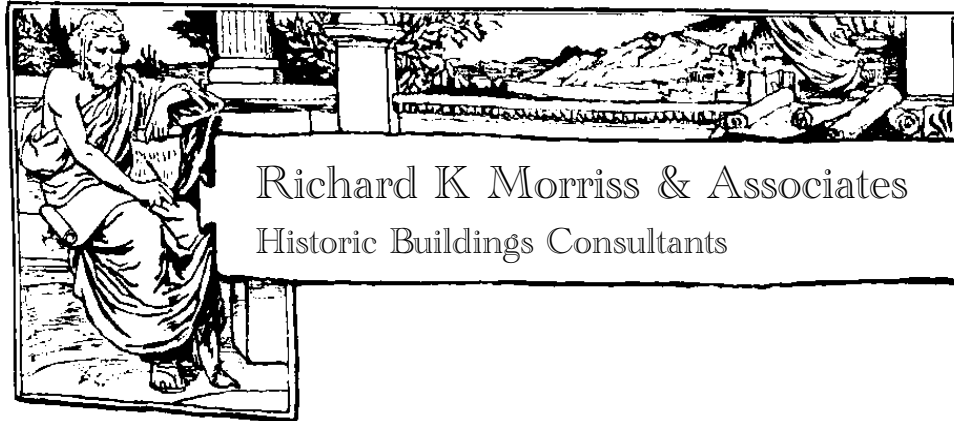
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The Consultancy

Richard K Morriss founded this Consultancy in 1995 after previously working for English Heritage, the Ironbridge Institute of the University of Birmingham and, for eight years, as Assistant Director of the Hereford Archaeology Unit. Although Shropshire-based the Consultancy works throughout the UK on a wide variety of historic buildings for clients that include the National Trust, the Landmark Trust, English Heritage, the Crown Estates, local authorities, owners, architects, planning consultants and developers. It specialises in the archaeological and architectural analysis of historic buildings of all periods and planning advice related to them including heritage impact assessments.

It also undertakes broader area appraisals, urban heritage assessments, and Conservation Management Plans.

Richard Morriss is a former Member of the Institute of Field Archaeologists and of the Association of Diocesan and Cathedral Archaeologists, archaeological advisor to four cathedrals and author of many academic papers and over 20 books, mainly on architecture and archaeology, including The Archaeology of Buildings (Tempus 2000), The Archaeology of Railways (Tempus 1999); Roads: Archaeology & Architecture (Tempus 2006) and ten in the Buildings of series: Bath, Chester, Ludlow, Salisbury, Shrewsbury, Stratford-upon-Avon, Warwick, Winchester, Windsor, Worcester (Sutton 1993-1994). The latest work is an Historic England funded monograph on the Houses of Hereford (Oxbow 2018). He was a member of the project team assembled by the Landmark Trust responsible for the restoration of Astley Castle, Warwickshire, winner of the 2013 RIBA Stirling Prize.



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