

HANDFORTH

HERITAGE

Shurgard House, Uxbridge Road
Heritage Impact Assessment

July 2022

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1. Introduction

This Heritage Statement ('report') has been produced by Handforth Heritage on behalf of Shurgard UK Ltd to accompany a planning application for the extension of an existing modern self storage unit located to the west of the Grand Union Canal.

The site contains a collection of self-storage buildings (Use Class B8) which were granted planning permission in 1999. None of the buildings on the site are statutorily listed, locally listed or located within a conservation area and are located within the London Borough of Hillingdon. The site is located immediately to the west of the Canalside Conservation Area in the London Borough of Ealing however. Any proposals therefore have the potential to affect the setting of this heritage asset. As per the requirements of the NPPF this is a material consideration in the planning process.

In accordance with Historic England's *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (GPA 3)* this report has been produced to identify any heritage assets and their settings that may be affected by the proposals. Paragraph 194 of the National Planning Policy Framework (NPPF) highlights that the significance of the identified heritage assets including any contribution made by their settings to determine what the potential impact of changes to the site may have on this.

This report has been undertaken in accordance with Historic England's guidance on heritage assessments, namely *Statement of Heritage Significance: Analysing Significance in Heritage Assets Historic England Advice Note 12*. The legislation and policy framework applicable to this application is set out at Appendix 1.



Figure 1 Indicative location of site highlighted in red, listed buildings highlighted with blue triangles.

2. Historic Development

The site is located immediately to the north of Uxbridge Road, an important primary route into London from the west, and to the west of the Grand Union Canal. It is located to the eastern edge of Hayes, just west of Southall. The area became a centre of industry after the construction of the canal (1794) and the Great Western Railway (1839). The canal provided a reliable and efficient mode of transport prior to the advent of the railway and adequately metalled road surfaces. The canal connected the growing city of London to the industrial manufacturing towns and mining areas in the Midlands and further north. Its location had a direct impact on the landscape, bringing with it new industrial and residential areas.

The 1864 OS map provides an early glimpse into the character of the area of the time. The site and most of the surrounding area is predominately rural with a number of farms located off the Uxbridge Road. Visible on this map are also the Yeading Brook (still visible today) and a brick field to the south east of the site, strategically located along the canal. The success of the brick industry can be seen in the next OS map of 1894 where a terrace of houses has appeared adjacent to the canal. The 1901 census describes the occupation of the inhabitants at the time, the majority of which are 'general labourers', 'brick makers' and 'engine drivers in the brickyard.'



Figure 2 1864 OS map prior to the intensification of development along the canal.



Figure 3 1894 OS Map, showing only a modest increase in development to the south east of the site.

2. Historic Development

The population of the area grew quickly from the end of the 19th century, encouraged by the arrival of electric trams in 1901 (Pevsner and Cherry, *London 3: North West*). This can be clearly seen in the 1913 map which shows swathes of Southall to the east of the site being dominated by terraced housing.

The canal itself by this point still remains largely undeveloped with open land characterising this stretch. Two buildings have appeared to the western edge of the site which is described as a 'wharf'. By 1935 considerable changes are visible in the surrounding landscape with the further development of terraces to the east and north west. Other industries have appeared by this point including a tyre factory to the south west of the site along the Uxbridge Road. The southern section of the site is in use as a timber yard at this point, with four small buildings located immediately adjacent to the canal.

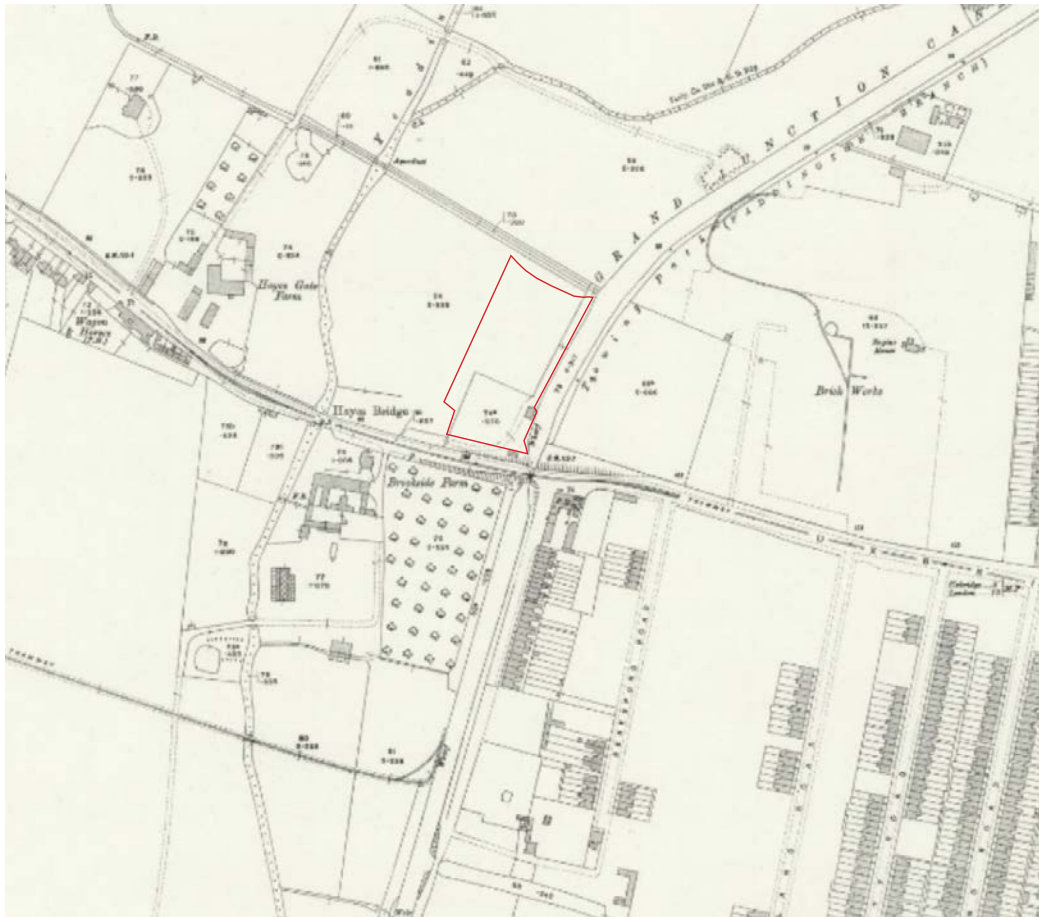


Figure 4 1913 OS map. The site is still largely undeveloped by this point, although two buildings have appeared immediately adjacent to the canal on a patch of land labelled as a wharf.

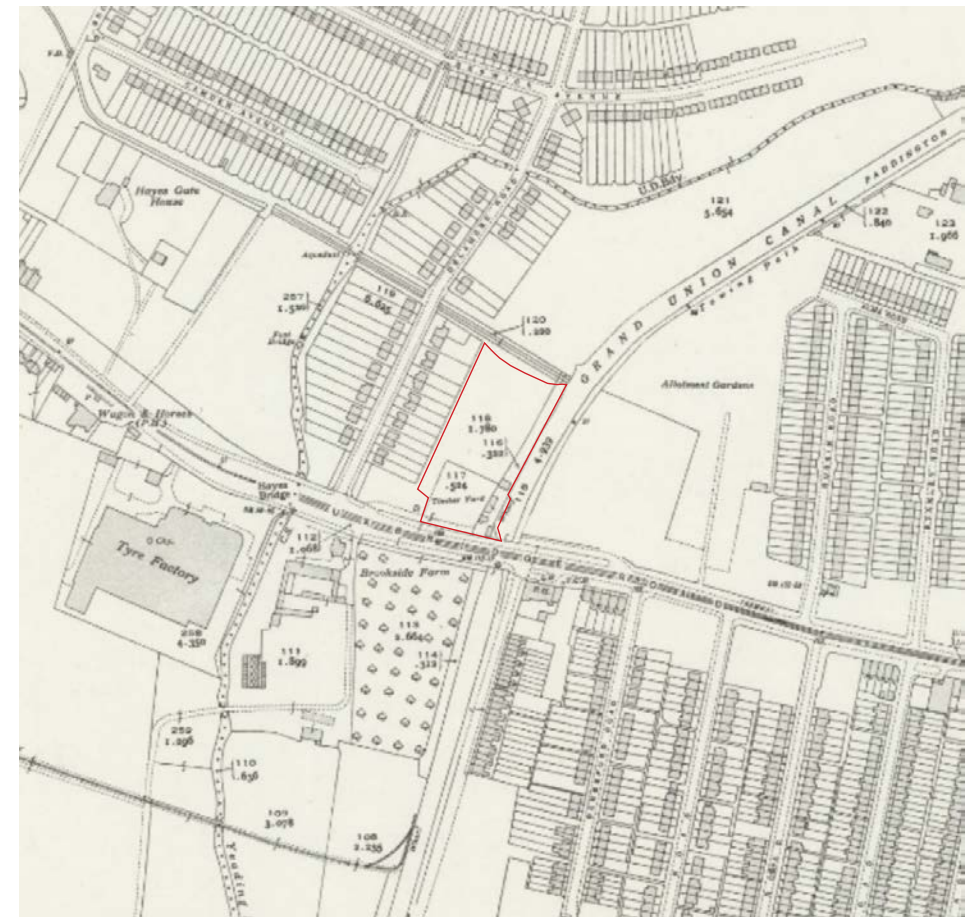


Figure 5 1935 map. The wider area has developed considerably, although the canal still features large swathes of open land. The southern most part of the site is now described as a timber yard and four buildings are located immediately to the east along a wharf.

2. Historic Development

The first considerable development on the site can be seen on the 1940 OS map where a series of large sheds and smaller rectangular buildings are visible. A 1937 aerial photograph provides an indication of the scale and massing of these structures. There are still large sections of open agricultural land visible in this images, but it is apparent that the character of this stretch of the canal is becoming much more industrial in character, reflecting its strategic location along both the canal and the Uxbridge Road.



Figure 6 1940 OS map showing the first considerable development on the site.

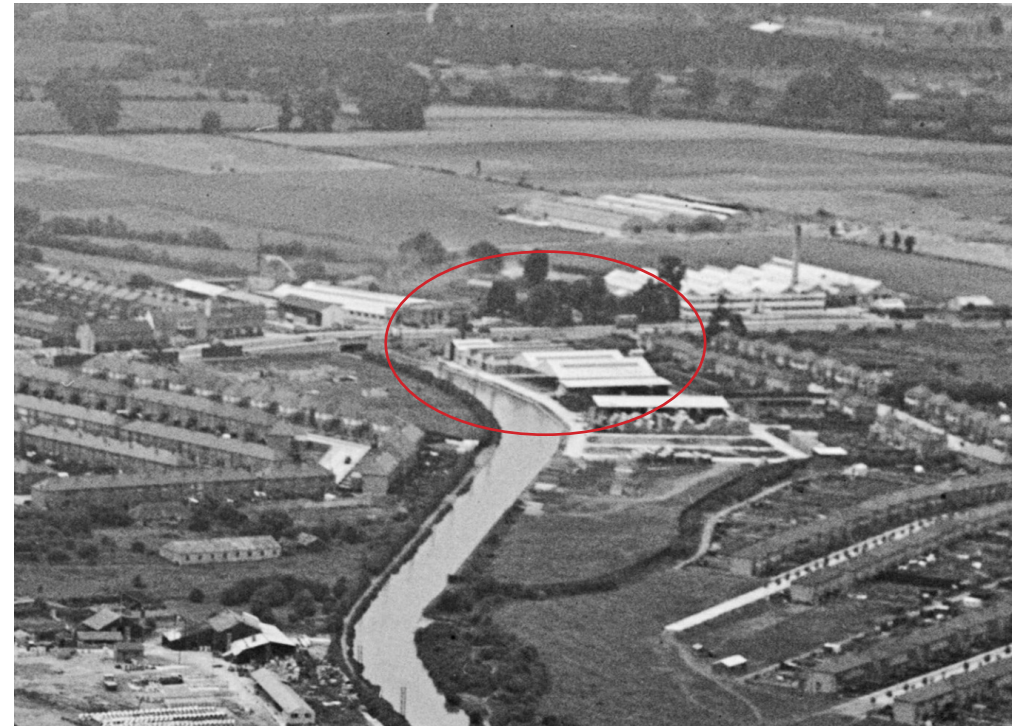


Figure 7 1937 aerial map showing the site. The area is still largely open although industrial units are beginning to dominate the landscape along the canal and the Uxbridge Road.

2. Historic Development

A 1947 aerial photograph shows the buildings on the site remain largely unchanged, but further industrial units have been constructed to the north. The 1960 map shows the proliferation of industrial units along the canal, especially along the western side and further afield.



Figure 8 1947 Aerial map.

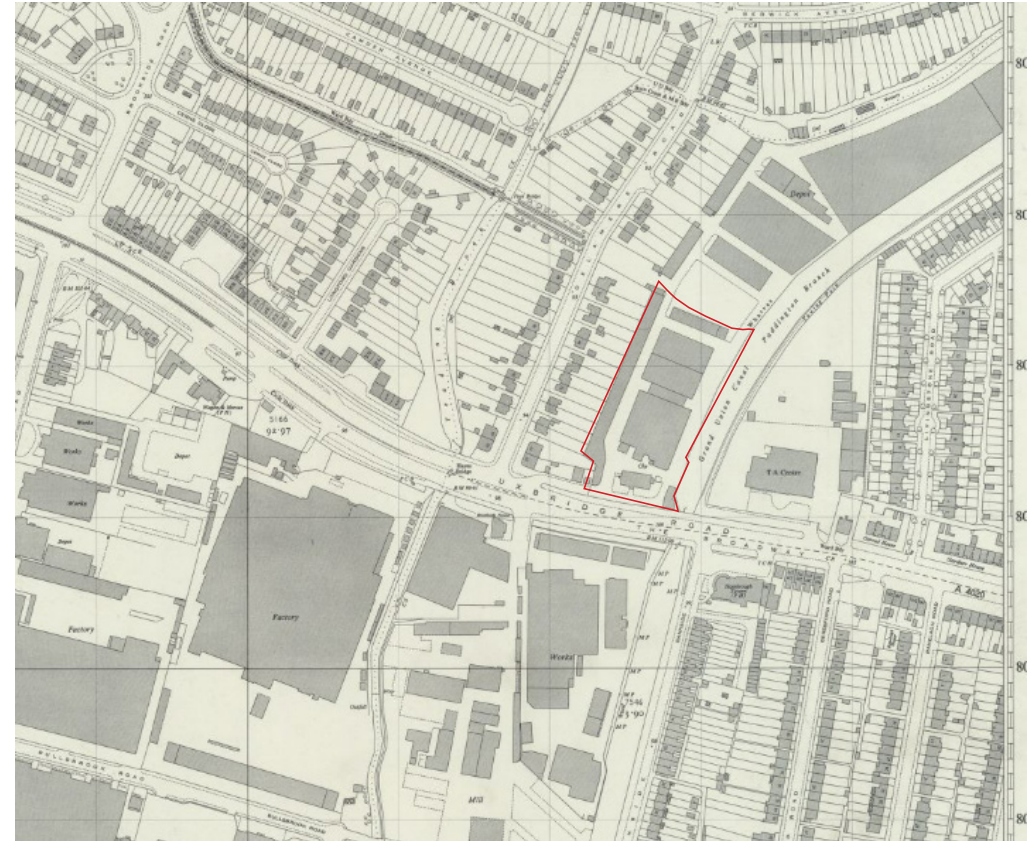


Figure 9 1960 OS map showing extensive industrialisation along the canal and to the south west of the site.

3. The Site - Overview

The site consists of a large building, drive-up access storage units and a front of house shop with attached lighthouse fronting the Uxbridge Road. The development as it appears today was granted planning permission in 1999 (ref: 49467/D/99/0537) and saw the re-cladding and extension of 'Alpha House' which was a large storage building, the demolition of the four storey 'Bridge House' office, and a social club/canteen owned by Thorn EMI. This application also involved the change of use of the existing Alpha House to self-storage (Use Class B8). The buildings on the site are of no architectural or historic interest, but are located immediately west of the Canalside Conservation Area.

The following section provides an aerial map showing key views of the site followed by corresponding photographs.

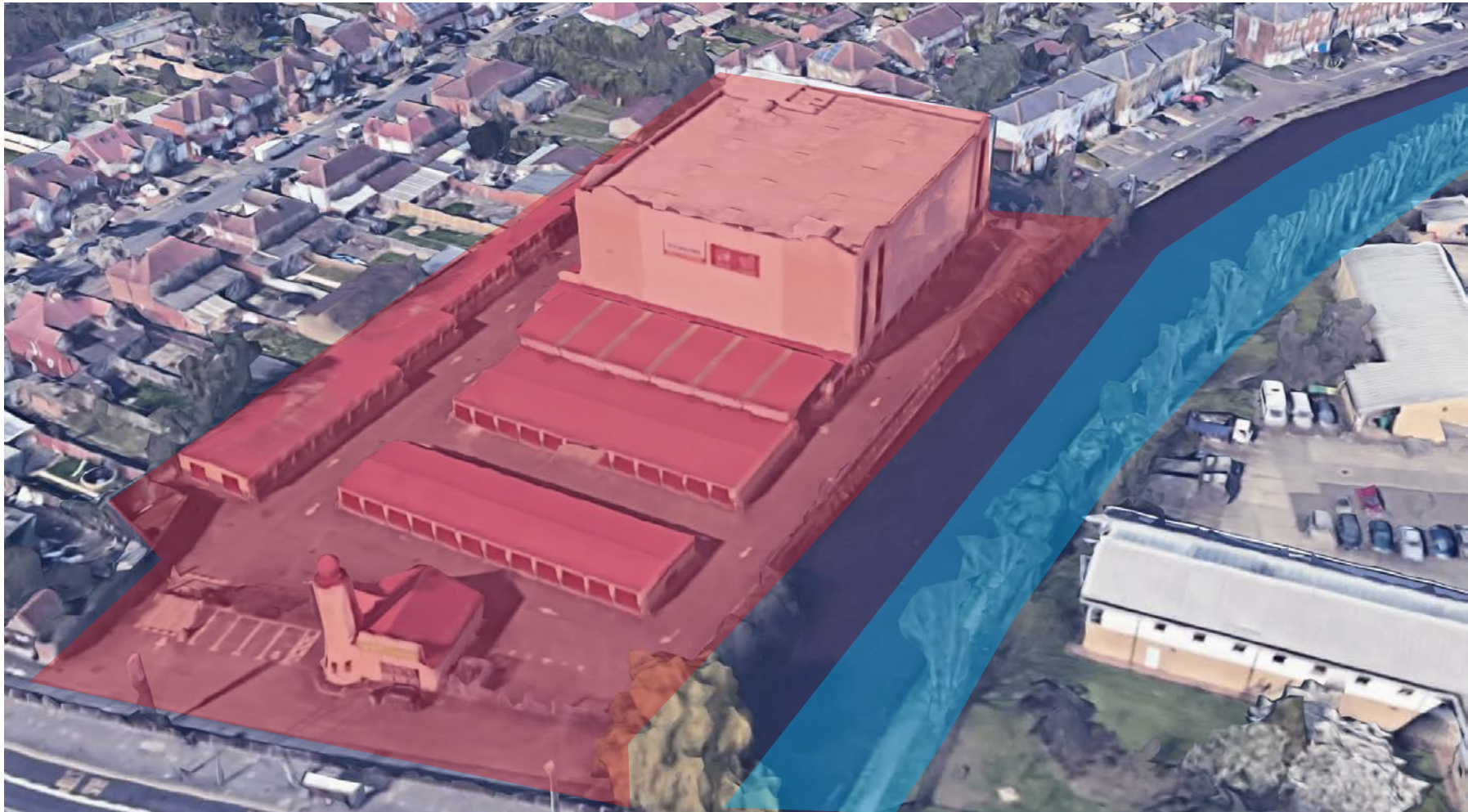


Figure 10 The site shown in red, and a section of the conservation area in blue.

3. The Site - Views



Figure 11 Aerial view of the site showing photo locations (numbers correspond with photographs on following pages).

3. The Site - Views



Plate 1 View looking north towards the site from the Uxbridge Road.



Plate 2 View from north east towards the site from the Uxbridge Road.



Plate 3 View looking north west towards the site from the bridge on the Uxbridge Road.



Plate 4 View looking north west from the canal tow path towards the site. Note existing vegetation would help screen the new development from this location.



Plate 5 View looking south west from the tow path towards the site showing the industrial character of the site.



Plate 6 View further north along the canal looking south towards the site. Note in these distant views there would be no appreciation of the proposals due to the bend in the canal.

4. Identification of Heritage Assets and Significance Assessment

An inspection of the relevant databases and sources, including the Historic Environment Record (HER), the National Heritage List for England (NHLE), and the Council's website, has identified numerous Heritage Assets lying within the vicinity of the Site. Following desk based research and on site analysis, professional judgement has been used to identify, and select Heritage Assets whose significances may be affected by changes to their settings or direct impacts.

This assessment has been undertaken in accordance with Historic England's *The Setting of Heritage Assets GPA 3*. In accordance with Paragraph 194 of the NPPF the level of detail is proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

There are no Heritage Assets located within the London Borough of Hillingdon that have the potential to be affected by the proposals, but there is one within the London Borough of Ealing:

1. Canalside Conservation Area



Figure 12 Showing the southern extent of the Canalside conservation area (red), based on Ealing Borough council's interactive planning map. Note the sheer size of the area, compared to the site (in yellow), and the large swathes of industrial developments which dominate to the south and west, and are an essential part of the character of the conservation area.

4. Identification of Heritage Assets and Significance Assessment

The following section provides an assessment of significance of this Heritage Asset including an assessment of the contribution that its setting makes to this. This is then followed by section 5 which determines the potential impact the scheme will have on this significance.

1. Canalside Conservation Area

Description

The Canalside conservation area (located within the London Borough of Ealing) was first designated in 1993 and extended in 1994 to include areas that had been taken within Ealing Borough as a result of changes made by the Boundary Commission.

The conservation area includes the whole length of the Grand Union Canal within Ealing, except for a stretch between Norwood Top Lock and the Hanwell Locks, which are located within the St Mark's Church and Canalside conservation area. The historic environment of the canal primarily includes the waterway, its banks, towpath and bridges crossing it. The council's conservation area appraisal discusses the importance of the setting of the conservation area:

It also provides an interesting alternate space within diverse areas, including manufacturing districts, residential suburbs, parks and leisure spaces, as well as some agricultural areas. The character of the canal corridor is strongly influenced by these adjacent land uses, which can alternately provide enclosure to the spaces of the canal, or views across more open areas to prominent local landmarks

The canal is characterised by long narrow corridors, the main channel of the canal and the southern section are formed of long, straight sections with occasional bends, whilst the more northerly parts of the Paddington Branch tend to be more winding with regular bends resulting in more restricted, intimate views. The council's conservation area appraisal identifies a number of key views in the area, of which none include the site, reflecting its less sensitive nature.

The site itself is located within Sub Area No. 4: Western Avenue to Bull's Bridge character area. The council's appraisal states:

Between Western Road and Bulls Bridge the CA has a more industrial feel than in the preceding areas. This reflects the historic development of industry in the area surrounding the Bulls Bridge Junction with the Paddington Branch as well as the redevelopment of the brick fields that were worked out in the 19th century.

The conservation area only contains one listed building, Bull's Bridge, which is over one mile away from the site to the south. The council's appraisal acknowledges that:

At present the CA contains few buildings or structures other than the canal banks and the bridges crossing the canal.

The appraisal discusses the importance of trees in the conservation area:

The trees lining the canal in the more industrial areas help to screen the intrusive modern industrial buildings from views from within the CA

The appraisal also highlights negative features within the conservation area:

The Canalside is often faced with featureless walls or impenetrable security fencing to the rear or side elevations of large industrial buildings, which detract from the feeling of activity and increase the sense of isolation, which in these industrial areas can be intimidating.

Whilst the scale and appearance of the site is considered to detract from the overall aesthetic setting of the conservation area, it is considered to reinforce its industrial character, resulting in an overall neutral impact on its significance

Setting

The majority of industrial buildings within the setting of the conservation area are modern in scale and materiality and aesthetically detract from its appearance. In terms of its character however, they are representative of uses that have dominated the area since the early to mid 20th century and form part of its historic narrative. None of the buildings within the site positively contribute to the appearance of the conservation area but do contribute to its character.

Significance

The Canalside conservation area forms part of a wider nationally significant transport route. Whilst few original buildings that line this part of the conservation area survive, it is the overall form of the waterway, with its associated tow path, and juxtapositions of uses that contribute to its overall significance which is primarily historic rather than aesthetic. The area is also of evidential value of the construction methods employed to dig and line the canal with brickwork that could withstand extended periods underwater.

4. Identification of Heritage Assets and Significance Assessment



Plate 7 View looking north from just north of the site. Modern residential development set back from the canal has a neutral impact on the conservation area, swaths of green boundaries provide positive features.



Plate 8 Typical view within the conservation area showing soft edges obscuring more industrial backdrops here, with a blank brick building and palisade fence.



Plate 9 View looking south from Uxbridge Road bridge.



Plate 10 Views of workers cottages associated with former brick works provide a positive contribution to the conservation area.



Plate 11 The site as seen from the tow path. The building has a negative impact aesthetically but reinforces the industrial character of the area.



Plate 12 House boats and their associated gardens provide aesthetically pleasing elements of the setting of the conservation area.

4. Identification of Heritage Assets and Significance Assessment



Plate 13. House boats just outside the conservation area.



Plate 14. Industrial unit to the south of the conservation area, aesthetically detract but reinforce industrial character.



Plate 15 View looking north towards the site. Views are limited of the buildings on the site from here.



Plate 16 Views of more industrial sheds to the south of the conservation area that form part of its setting.



Plate 17 Further sheds that form part of the area's setting.



Plate 18 Green edges to the conservation area provide relief from the urban environment. Here, palisade fencing to the right provides an unsightly boundary to the area.

4. Identification of Heritage Assets and Significance Assessment



Plate 19 Modern bridge within the conservation area.



Plate 20 View beneath railway bridge.



Plate 21 Typical industrial unit seen in the setting of the conservation area, reinforces its industrial character.



Plate 22 One of the few historic buildings in the setting of the conservation area, seen from the grade II listed Bull's Bridge, over a mile south of the site.

5. Proposals and Assessment of Impact

Background

A pre-application submission was submitted to the London Borough of Hillingdon on the 3rd February 2022 for the:

Extension to existing self-storage use for additional self storage floorspace (Use Class B8)

The council provided a number of key comments that have been taken into account in the current application, namely:

If a scheme is to be supported, in design terms, then consideration should be given to improving the appearance of the blocks so that they are more harmonious and allow the development to sit more quietly in this sensitive location.

Proposal

The current proposal provides a similar scope of work to that of the pre-app, seeking to retain the existing five storey building and single-storey external units to the north and west of site and to demolish the existing single-storey elements to the south of the main building. The gables to the roof of the five storey structures will be removed and the structure painted in a RAL 9006 to match a proposed extension.

This new extension would be used for the provision of self-storage floorspace (Use Class B8) to the south of the existing building to match the five-storey height. This new structure would be approximately 37 metres wide, 29 metres deep and 16 metres tall.

The design of the proposals has sought to address key comments from this pre-application submission.

Impact

Policy DMHB 4 of the Hillingdon Local Plan: Part Two- Development Management Policies (2020) states that development in on to the fringes of conservation areas will need to preserve or enhance the character or appearance of the area, including its local character and distinctiveness.

This report has demonstrated that there are very few historic structures surviving within or adjacent to the conservation area. The key areas of aesthetic interest are those that have soft, green edges, that provide a calm and tranquil environment. The original setting of the canal, was characterised by open fields, although industry in the hinterland would have



Figure 13 Proposed eastern elevation fronting the canal.

5. Proposals and Assessment of Impact

been apparent with the emerging industries such as brick making, which slowly altered this rural character.

The conservation area today, due to its location within the suburbs of London, and proximity to busy thoroughfares such as the M1, has an underlying urban character and setting, this is softened through the use of vegetation and tree screening, but there are always glimpses or clear vistas of the surrounding urban context. In addition to this, the setting is largely characterised by low lying modern housing estates, and industrial sheds. None of these developments are considered to make a positive contribution to the appearance of the area, rather they are largely neutral features, that represent the historical evolution of this part of the canal.

The proposed development would reinforce this industrial character, which would be in keeping with the general industrial nature of large sections of the conservation area. Whilst the proposal would be larger than what is there at present, it is not considered to be out of keeping with this character, and would not result in an overall negative impact.

Notwithstanding this, to soften the impact of the proposals, it has been proposed to provide soft landscaping and trees to the edge of the canal, which would result in a positive impact.

Similarly, policy DMHB 11 states that new development should take into account the surroundings, including height, mass and bulk of adjacent structures. Again, this proposed extension would be in keeping with the existing shed on the site that was granted planning permission by the council in 1999.

Summary

The proposals will have both positive and negative impacts upon the setting of the adjacent Canalside conservation area. However, the proposals would be in keeping with the industrial character identified within the conservation area appraisal and will bring much needed investment to the area that will have an overall net, 'no harm' impact on the significance of the conservation area.

As such, the proposals are considered to preserve the special interest of the conservation area in accordance with section 72 of the Planning (Listed Buildings And Conservation Areas Act) 1990 the NPPF and the council's local planning policies.

Appendix 1: Legislation, Planning Policy and Guidance

Legislation

Legislation regarding Listed Buildings and Conservation Areas is set out in the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) (the 1990 Act).

Section 72(1) states that, in the exercise of planning functions, special attention should be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

The term “preserve”, within the context of Section 66, has been defined within *South Lakeland District Council v Secretary of State [1992]*, where it was held that the “desirability of preserving” creates a presumption against harmful changes, but not a presumption against any change. Case law has established that the preservation of the setting of a listed building requires considerable importance and weight (i.e. the Barnwell Manor judgment) and that a decision-maker who has worked through the paragraphs of the NPPF in accordance with their terms will have complied with the statutory duty set out in the 1990 Act (i.e. the judgment in *Jones v Mordue & Others [2015]*).

In the judgment for *Palmer v Herefordshire Council* ([2016] EWCA Civ 106), a discussion on the balance between harm and benefit to a listed building was undertaken. It was accepted that “where proposed development would affect a listed building or its settings in different ways, some positive and some negative, the decision-maker may legitimately conclude that although each of the effects as an impact, taken together there is no overall adverse effect on the listed building or its setting”. In essence, where there is some harm and some benefit, these should be given the same weight, and where they are equal in measure, the effect on the listed building would be neutral, and thus its significance would be preserved.

This approach was confirmed in *City & Country Bramshill Ltd v Secretary of State for Housing, Communities And Local Government & Ors [2021]*. In this case Lord Justice Lindblom concluded that ‘the considerable importance and weight to the desirability of preservation [of the special architectural or historic interest of a listed building or its setting], should tip the scales to produce an unequal balance in its favour. However, the SoS should still take account of the actual severity of any change, or scale of change as the Mayoral SPG puts it, and so the extent of impact, as well as the relevance to its significance, and the importance of the asset. The overall weight to be given to any harm, and the conflict with policy, should be a product of these factors.’

National Planning Policy Framework (2021)

The policies relevant to heritage are outlined within chapter 16, ‘Conserving and Enhancing the Historic Environment’. The NPPF places much emphasis on ‘significance’ which it defines 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 NPPF directs local planning authorities to require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting and the level of detailed assessment should be ‘proportionate’ to the assets’ importance. (Paragraph 194).

Paragraph 195 states that the significance any heritage asset that may be affected by a proposal should be identified and assessed. This includes any assets affected by development within their settings. This Significance Assessment should be taken into account when considering the impact of a proposal, ‘to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal’.

Paragraph 199 requires that ‘When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.’

It is then clarified that any harm to the significance of a designated heritage asset, either through alteration, destruction or development within its setting, should require, “clear and convincing justification” (Paragraph 200). This paragraph outlines that substantial harm to grade II listed heritage assets should be exceptional, rising to ‘wholly exceptional’ for those assets of the highest significance such as scheduled monuments, Grade I and grade II* listed buildings or registered parks and gardens as well as World Heritage Sites.

Paragraphs 201 and 202 discuss different levels of harm caused to heritage assets. and requires a balance to be applied in the context of heritage assets, including the recognition of potential benefits accruing from a development. In the case of non-designated heritage assets, Paragraph 203 requires a Local Planning Authority to make a “balanced judgement” having regard to the scale of any harm or loss and the significance of the heritage asset.

With regards to conservation areas and the settings of heritage assets, paragraph 206 requires Local Planning Authorities to look for opportunities for new development to enhance or better reveal their significance.

Planning Practice Guidance

This guidance supports the NPPF and reiterates the importance of conserving heritage assets in a manner appropriate to their significance. Key elements of the guidance relate to assessing harm. An important consideration should be whether development proposals adversely affect a key element of the heritage asset’s significance:

‘it is the degree of harm, rather than the scale of development that is to be assessed’. The level of ‘substantial harm’ is stated to be a high bar, which may not arise in many cases. Whether development proposals cause substantial harm will be a judgment in the decision-taking process, having regard to the circumstances of the case and by applying the relevant NPPF policies. Such harm may arise from works to the heritage asset or from development within its setting. Setting is defined as:

the surroundings in which an asset is experienced, and may be more extensive than the curtilage.

A thorough assessment of the harm development proposals will have on this setting needs to consider, and be proportionate to, the heritage asset’s significance and the degree to which any changes enhance or detract from that significance, and the ability to appreciate and experience it.

Local Planning Policy

Hillingdon Development Plan

This consists of several sections, those relevant to this application from a heritage perspective include:

The Local plan: Part 1 - Strategic Policies (2012), namely PT1.BE1 Built Environment, PT1.HE1 Heritage and The Local plan: Part 2 - Development Management Policies (2020), DMHB 1: Heritage Assets, DMHB 4: Conservation Areas and DMHB 11 Design of New Development.

Guidance Notes

Conservation Principles, Policies, and Guidance (English Heritage, April 2008)

This document outlines Historic England’s approach to the sustainable management of the historic environment. While primarily intended to ensure consistency in their own advice and guidance through the planning process, the document is commended to LPAs to ensure that all decisions about change affecting the historic environment are informed and sustainable. This document was published in line with the philosophy of PPSS, yet remains relevant with the NPPF and PPG, the emphasis placed upon the importance of understanding significance to properly assess the effects of change to heritage assets. Guidance within the document describes a range of ‘heritage values’ that constitute a heritage asset’s significance to be established systematically; the four main heritage values include: aesthetic, evidential, communal or historical. The document emphasises that:

considered change offers the potential to enhance and add value to places...it is the means by which each generation aspires to enrich the historic environment.

Appendix 1: Legislation, Planning Policy and Guidance

Historic Environment Good Practice Advice in Planning Notes

GPA 2: Managing Significance in Decision-Taking in the Historic Environment (March 2015)

This document provides advice on the numerous ways in which decision-making in the historic environment can be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to its significance. In line with the NPPF and PPG, this document states that early engagement and expert advice in considering and assessing the significance of heritage assets is encouraged, stating that:

...application proposals that affect the historic environment are much more likely to gain the necessary permissions and create successful places if they are designed with the knowledge and understanding of the significance of the heritage assets they may affect.

The advice suggests a structured staged approach to the assembly and analysis of relevant information, this is as follows:

- Understand the significance of the affected assets;
- understand the impact of the proposal on that significance;
- avoid, minimise, and mitigate impact in a way that meets the objectives of the NPPF
- look for opportunities to better reveal or enhance significance;
- justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change;
- offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

The advice reiterates that direct physical change may affect heritage assets, or by change in their setting. Assessment of the nature, extent, and importance of the significance of a heritage asset and the contribution of its setting at an early stage can assist the planning process resulting in informed decision-taking.

This document sets out the recommended steps for assessing significance and the impact of application proposals upon a heritage asset, including examining the asset and its setting and analysing local policies and information sources. In assessing the impact of a development proposal on the significance of a heritage asset the document emphasises that the cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change.

GPA 3: The Setting of Heritage Assets (December 2017) (2nd Edition)

This advice note focuses on the management of change within the setting of heritage assets. This guidance updates that previously published by English Heritage (The Setting of Heritage Assets 2011) in order to ensure that it is fully compliant with the NPPF and is largely a continuation of the philosophy and

approach of the 2011 document. It does not present a divergence in either the definition of setting or the way in which it should be assessed.

Setting 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'. The guidance emphasises that setting is not a heritage asset or a heritage designation and that its importance lies in what it contributes to the significance of the heritage asset itself. Elements of setting may make a positive, negative or neutral contribution to the significance of a heritage asset.

While setting is largely a visual concept, with views considered to be an important consideration in any assessment of the contribution that setting makes to the significance of an asset, setting, and thus the way in which an asset is experienced, can also be affected by other environmental factors, including historic associations.

This document states that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset. It is further stated that the contribution made to an asset's significance by their setting will vary depending on the nature of the asset and its setting. Different heritage assets have the capacity to accommodate changes and, therefore, setting should be assessed on a case-by-case basis. Although not prescriptive in setting out how this assessment should be carried out, Historic England recommend using a '5-step process' to assess any effects of a development proposals on the setting and significance of a heritage asset:

- Identifying the heritage assets affected and their settings;
- Assessing whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);
- Assessing the effect of the development proposals on the significance of the heritage asset(s);
- Maximising enhancement and minimising harm;
- Making and documenting the decision and monitoring outcomes.