



Historic England

Sally Robbins  
Planning Department  
London Borough of Hillingdon

Your Ref: 49461/APP/2025/3009  
Our Ref: 236701

Contact: Sandy Kidd  
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9 March 2026

Dear Ms Robbins,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
NATIONAL PLANNING POLICY FRAMEWORK 2024**

**ST MARTINS CAR PARK AND FORMER RUISLIP CAB ST MARTINS APPROACH RUISLIP HA4 8B**

*Erection of 6 number dwelling houses, with associate landscaping. This portion of the site will be changed from public parking to residential use. Conversion of the former CAB site to create a new paved public car park and re-painting car parking bays*

**Recommend Pre-Determination Archaeological Assessment/Evaluation**

Thank you for your consultation received on 20 February 2026.

The Greater London Archaeological Advisory Service (GLAAS) give advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

**Assessment of Significance and Impact**



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The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified in the Local Plan: [78078] Area: Ruislip

The application involves built development within the Ruislip Archaeological Priority Area in a sensitive location between the scheduled medieval motte/moated manor and the medieval church of St Martin of Tours. It lies within 100m of both designated heritage assets, so the proposed development is likely to affect the setting of both assets and associated buried archaeological remains. Unfortunately, both the heritage statement and archaeological desk-based assessment are rudimentary. The Heritage Statement does not clearly follow the methodology for assessing setting set out in Historic England's Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). Specifically, it is weak on the historic relationship between places and assets within the village. Despite these reservations, it is accepted that extending the row of houses along St Martin's Approach would cause at most a low level of harm to the scheduled monument through development in its setting. The reconfigured car park is close to the monument so care needs to be taken on design, lighting and related street furniture to minimise urbanising effects within this part of the conservation area.

The archaeological desk-based assessment (DBA) has unfortunately missed two significant sources - an earthwork survey plan published by the Royal Commission for Historical Monuments (England) in their 1937 volume on Middlesex and a summary of the village's archaeological potential by John Schofield in *London 1100-1600: The Archaeology of a Capital City* (2011). The DBA does recognise that "there is a moderate to high potential for unknown heritage assets with archaeological interest to be present from the Medieval period within the proposed development sites. The proposed development sites are located adjacent to the site of the medieval motte and bailey castle, and later medieval priory." But it then goes on to suggest that "If any unknown assets are present within the proposed development site these are likely to be of low heritage significance." (5.22). Later the DBA acknowledges that "The archaeological potential of the south site is not fully understood due to the unknown extent of the medieval castle and priory; therefore, a programme of archaeological evaluation will be required to assess the subsurface archaeological potential and characterise any archaeological remains present." and that "The proposed development sites may include below ground archaeological remains associated with the motte and bailey castle and priory" (6.5). In my view, the position that the site could contain archaeological remains associated with a scheduled monument is inconsistent with the earlier suggestion that such remains would likely be of low significance, especially as no justification is given for this conclusion.

I agree that field evaluation will be necessary for the south site to make an informed decision because of the potential for high significance archaeological remains associated with the scheduled monument and the potential for harm arising from new housing development, and perhaps from reconfiguration of the car park. The proposals for the north site do not appear to



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involve groundworks so would not affect buried archaeological remains.

### Planning Policies

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 207 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest. A field evaluation may also be necessary.

NPPF paragraphs 212 - 215 place great weight on conserving designated heritage assets, including non-designated heritage assets with an archaeological interest equivalent to scheduled monuments. Non-designated heritage assets may also merit conservation depending upon their significance and the harm caused (NPPF paragraph 216). Conservation can mean design changes to preserve remains where they are.

NPPF paragraphs 202 and 210 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Applicants should therefore expect to identify appropriate enhancement opportunities.

If preservation is not achievable then if you grant planning consent, paragraph 218 of the NPPF says that applicants should record the significance of any heritage assets that the development harms.

### Recommendations

Having looked at this proposal and at the Greater London Historic Environment Record but I need more information before I can advise you on the effects on archaeological interest and their implications for the planning decision. If you do not receive more archaeological information before you take a planning decision, I recommend that you include the applicant's failure to submit that as a reason for refusal.

Because of this, I advise the applicant completes these studies to inform the application:

### **Evaluation**

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.



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Whilst limited trial trenching was carried out in the southern part of the south site in 2019 further evaluation will be needed in the form of trial trenching on the proposed new housing row and within the car park.

I will need to agree the work beforehand and it should be carried out by an archaeological practice appointed by the applicant. The report on the work must set out the significance of the site and the impact of the proposed development. I will read the report and then advise you on the planning application.

You can find more information on archaeology and planning in Greater London on our website.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

**Sandy Kidd**

Archaeology Adviser  
Greater London Archaeological Advisory Service  
London and South East Region



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