



Historic England

Ms  
London Borough of Hillingdon  
3 North, Civic Centre  
High Street  
Uxbridge  
Middlesex  
UB8 1UW

Direct Dial:

Our ref: P01604821

13 March 2026

Dear Ms

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**ST MARTINS CAR PARK AND FORMER RUISLIP CAB ST MARTINS APPROACH  
RUISLIP HA4 8BD  
Application No. 49461/APP/2025/3009**

Thank you for your letter of 20 February 2026 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Historic England Advice**

The proposed development site is within a sensitive area of Ruislip. It is within the Ruislip Village Conservation Area and Ruislip Archaeological Priority Area. It is also within close proximity to the Ruislip Motte and Bailey scheduled monument (NHLE ref 1002045) and a number of listed buildings, including the grade I listed Church of St Martin of Tours and the grade II\* listed Great Barn to West of Manor Farm Yard. This group of heritage assets combine to make Ruislip one of the best examples of a medieval rural settlement within the Greater London area.

Historic England think that the cultural heritage and desk-based assessments provided with the application take a very narrow view of 'setting', often conflating it primarily with 'views'. It does not fully consider what the area of the proposed development site contributes to the historic core of Ruislip and how further urbanisation and infilling of currently 'open' space may harm our understanding and appreciation of designated heritage assets and their inter-relationships.

We also note that there is the potential for non-designated archaeological remains, if present, to be damaged or destroyed during the works. The application indicates that there is a high likelihood that remains could be present that are associated with the scheduled monument (e.g. DBA para 6.5). In particular, the proposed development



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location appears to be situated on the site of a large east-west running ditch (documented in the RCHME Inventory of Historical Monuments in Middlesex, 1937). If present, we do not agree with the assessment that potential remains would be of likely 'low significance' (DBA para 5.22). If remains are present which are associated with the medieval occupation of the motte and bailey, or the Benedictine Priory phase of use then they may be of a higher significance. Furthermore, the question of whether or not archaeological remains associated with the scheduled monument present within the proposed development area may provide a better understanding of the significance of this space as part of the setting of the scheduled monument and within medieval Ruislip as a whole. Therefore we highly recommend that you consult with the Greater London Archaeological Advisory Service in order to obtain their advice on the potential for non-designated archaeological remains at this location.

The National Planning Policy Framework (Dec 2024) is clear that heritage assets are an irreplaceable resource and states the requirement for conservation in a manner appropriate to the assets significance (paras 202 and 212). Therefore, the significance of heritage assets affected must first be described, including any contribution made by their setting (para 207), and then the harm to heritage significance should be avoided or minimised (para 208). *Any* remaining harm is to be clearly and convincingly justified (para 213) and, in the case of 'less than substantial harm' should be weighed against the public benefits of the proposal (para 215).

Without a full understanding of both the archaeological resource of the area and how this space relates to both the scheduled monument and the medieval core of Ruislip in general, it is difficult to pinpoint an exact level of harm which may be caused by the development to the significance of the designated heritage assets. We do not agree that it is as negligible an impact as the applicant presents, however, we also accept that it is most likely to be harm at the lower end of the spectrum. It will be for your authority to determine if you feel that sufficient information has been obtained in order to make a clear determination in this case, and if the benefits provided by the proposed housing scheme provide sufficient public benefit to outweigh the potential harm to the historic environment.

## Recommendation

Historic England do not think that enough consideration or weight has been given to the potential significance of the proposed development site within the medieval core of Ruislip and to the setting of the various designated heritage assets. Therefore, we consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 207, 208, and 213 of the NPPF.

In determining this application you should bear in mind the statutory duty of both:

- section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act



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1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess; and

- section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

Inspector of Ancient Monuments

E-mail: @historicengland.org.uk

cc (GLAAS)



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