

11-17 Victoria Road
Ruislip

HERITAGE ASSESSMENT

12 January 2026

GJHP

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1 INTRODUCTION

- 1.1 This Heritage Assessment has been prepared by GJHP in support of the planning application for the redevelopment of nos. 11-17 Victoria Road (the 'Site') in Ruislip in the London Borough of Hillington. GJHP is a consultancy that provides expert advice on heritage and townscape matters.
- 1.2 This assessment considers the effect of the proposed development (the 'Proposed Development') on the setting of the neighbouring locally listed Ruislip Manor London Underground Station, as well as that of designated heritage assets within a 250m radius of the centre of the Site. The detailed design of the Proposed Development has been revised to address comments made by the Inspector in the recent appeal ref: APP/R5510/W/25/3370257.
- 1.3 The report sets out the following:
- Relevant statutory duties and national and local policy and guidance;
 - A description of the Site and its heritage context;
 - An assessment of the heritage significance of the heritage assets within the study area;
 - An assessment of the Proposed Development and its effect on heritage significance in light of the statutory duties of the Planning (Listed Buildings and Conservation Area) Act 1990 and national and local policy and guidance.
- 1.4 The report should be read in conjunction with the DAS and application drawings prepared by Wave Architects and the planning statement prepared by Beamish Planning Consultancy.
- 1.5 Gareth Jones BA Hons MA UD Dip Bldg Con (RICS) IHBC RTPI set up GJHP in 2019. He has over 28 years' experience across the public and private sectors. He has worked in the conservation and design teams at the London Borough of Hammersmith and Fulham, Westminster City Council and the London Borough of Richmond Upon Thames and was a design review advisor at CABE. At Peter Stewart Consultancy he worked on a number of high profile projects including the new library at Lambeth Palace, Southbank Place and proposals for Richmond House, Whitehall.

2 LEGISLATION, POLICY & GUIDANCE

- 2.1 This section contains an overview of the statutory duties and national and local planning policies and guidance that are relevant to the consideration of heritage matters.

Statutory Duties

The Planning (Listed Buildings and Conservation Areas) Act 1990

Listed buildings

- 2.2 Section 66 (1) of the Act states, *'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.'*

National planning policy and guidance

The National Planning Policy Framework, 2024

- 2.3 The Government issued the latest version of the National Planning Policy Framework (NPPF) in December 2024. The NPPF sets out planning policies for England and how these should be applied.
- 2.4 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, which has three overarching objectives; economic, social and environmental. The NPPF states, at paragraph 10, that *'at the heart of the Framework is a presumption in favour of sustainable development.'*

NPPF Section 16: Conserving and enhancing the historic environment

- 2.5 Section 16 of the NPPF deals with conserving and enhancing the historic environment. It applies to plan-making, decision-taking and the heritage-related consent regimes under the 1990 Act.
- 2.6 Heritage assets are defined in Annex 2 of the NPPF as *'A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).'*

- 2.7 The NPPF notes, at paragraph 202, that heritage assets *'should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.'*
- 2.8 The NPPF requires an applicant to describe the heritage significance of any heritage assets affected by a proposal, including any contribution made by their setting (paragraph 207). It goes on to say that *'the level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.'*
- 2.9 The NPPF (paragraph 210) identifies three key factors local authorities should take into account in determining applications:
- 'The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
The desirability of new development making a positive contribution to local character and distinctiveness.'
- 2.10 Paragraph 212 states that in assessing impact, the more important the asset, the greater the weight should be given to its conservation. Paragraph 200 notes that heritage significance can be harmed or lost through alteration or destruction of the heritage asset or from development within its setting.
- 2.11 The setting of a heritage asset is defined in Annex 2 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.'*
- 2.12 The NPPF states, at paragraph 214, that where a proposed development would lead to *'substantial harm'* or total loss of heritage significance of a designated heritage asset, consent should be refused, *'...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 a number of specified criteria apply, including that the nature of the heritage asset prevents all reasonable uses of the site.
- 2.13 Where a development proposal will lead to *'less than substantial'* harm to the heritage significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use (paragraph 215).

- 2.14 Paragraph 216 states the effect of an application on the significance of a non-designated heritage asset requires a balanced judgement having regard to the scale of any harm or loss and the heritage significance of the heritage asset.
- 2.15 The NPPF requires local planning authorities to look for opportunities for new development within conservation areas and within the setting of heritage assets to enhance or better reveal their heritage significance. Paragraph 219 goes on to say *‘Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably’*.

Planning Practice Guidance

- 2.16 The PPG includes a section called *‘Historic environment’* which was updated on 23 July 2019. It explains which bodies are responsible for the designation of HAs and provides information on heritage consent processes.
- 2.17 The PPG considers the factors that should inform decision taking about developments that would affect HAs. It notes that *‘HAs may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a HA, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals...’* (18a-007---20190723). It goes on to say *‘understanding the significance of a heritage asset and its setting from an early stage in the design process can help to inform the development of proposals which avoid or minimise harm’* (18a-008). It states that in assessing proposal, where harm is found, the extent of harm should be *‘clearly articulated’* as either *‘substantial’* or *‘less than substantial’* (18a-018).
- 2.18 The PPG notes that setting is defined in the NPPF and that *‘all heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset’s curtilage may not have the same extent’* (18a-013---20190723). It goes on to say, *‘the extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell 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’* (18a-013-20190723).

Local policy and guidance

The Local Plan: Part 1 Strategic Policies (November 2012)

- 2.19 The Local Plan Part 1 sets out the overall level and broad locations of growth up to 2026. It comprises a spatial vision and strategy, strategic objectives, core policies and a monitoring and implementation framework with clear objectives for achieving delivery. These policies are supported by more detailed policies and allocations set out in the Local Plan Part 2.
- 2.20 Strategic Objective SO₁ is to *‘Conserve and enhance the borough’s heritage and their settings by ensuring new development, including changes to the public realm, are of high quality design, appropriate to the significance of the heritage asset, and seek to maintain and enhance the contribution of built, landscaped and buried heritage to London’s environmental quality, cultural identity and economy as part of managing London’s ability to accommodate change and regeneration.’*
- 2.21 Policy *‘HE1: Heritage’* states the Council will amongst other things:
- ‘Conserve and enhance Hillingdon’s distinct and varied environment, its settings and the wider historic landscape, which includes:
Historic village cores, Metro-land suburbs, planned residential estates and 19th and 20th century industrial areas, including the Grand Union Canal and its features;
Designated heritage assets such as statutorily Listed Buildings, Conservation Areas and Scheduled Ancient Monuments;
Registered Parks and Gardens and historic landscapes, both natural and designed;
Locally recognised historic features, such as Areas of Special Local Character and Locally Listed Buildings; and
Archaeologically significant areas, including Archaeological Priority Zones and Areas.’*
- 2.22 Policy *‘BE1: Built Environment’* states that *‘the Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. All new developments should’* and that inter alia new development should:
- ‘1. Achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place;*
 - 2. Be designed to be appropriate to the identity and context of Hillingdon’s buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials and seek to protect the amenity of surrounding land and buildings, particularly residential properties’;*

Local Plan Part 2 Development Management Policies (16 January 2020)

2.23 The Local Plan Part 2 Development Management Policies and Site Allocations and Designations were adopted as part of the borough's development plan at Full Council on 16 January 2020. This replaces the Local Plan Part 2 Saved UDP Policies (2012).

2.24 Policy 'DMHB 1: Heritage Assets' states at part A that

'The Council will expect development proposals to avoid harm to the historic environment. Development that has an effect on heritage assets will only be supported where:

- i) it sustains and enhances the significance of the heritage asset and puts them into viable uses consistent with their conservation;*
- ii) it will not lead to a loss of significance or harm to an asset, unless it can be demonstrated that it will provide public benefit that would outweigh the harm or loss, in accordance with the NPPF;*
- iii) it makes a positive contribution to the local character and distinctiveness of the area;*
- iv) any extensions or alterations are designed in sympathy, without detracting from or competing with the heritage asset;*
- v) the proposal would relate appropriately in terms of siting, style, scale, massing, height, design and materials;*
- vi) buildings and structures within the curtilage of a heritage asset, or in close proximity to it, do not compromise its setting; and*
- vii) opportunities are taken to conserve or enhance the setting, so that the significance of the asset can be appreciated more readily'*

2.25 Policy 'DMHB 2: Listed Buildings' states at part D that planning permission will not be granted for proposals which are considered detrimental to the setting of a listed building.

2.26 Policy 'DMHB 3: Locally Listed Buildings' states that:

'A) There is a general presumption in favour of the retention of buildings, structures and features included in the Local List. The Council will take into account the effect of a proposal on the building's significance and the scale of any harm of loss when considering planning applications, including those for major alterations and extensions. Proposals will be permitted where they retain the significance, appearance, character or setting of a Locally Listed Building.

B) Applications should include a Heritage Statement that demonstrates a clear understanding of the importance of the structure and the impact of the proposals on the significance of the Locally Listed Building.

C) Replacement will only be considered if it can be demonstrated that the community benefits of such a proposal significantly outweigh those of retaining the Locally Listed Building.'

2.27 Policy 'DMHB 4: Conservation Areas' states that 'new development, including alterations and extensions to existing buildings, within a Conservation Area or on its fringes, will be expected to preserve or enhance the character or appearance of the area. It should sustain and enhance its significance and make a positive contribution to local character and distinctiveness'.

2.28 Policy 'DMHB 11: Design of New Development' states at part A that 'All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including' inter alia:

'i) harmonising with the local context by taking into account the surrounding:

- scale of development, considering the height, mass and bulk of adjacent structures;*
- building plot sizes and widths, plot coverage and established street patterns;*
- building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure;*
- architectural composition and quality of detailing;*
- local topography, views both from and to the site.....*

iv) protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings'.

Other Guidance

Criteria and scoring for inclusion on the local list (PDF, 60 KB).

2.29 The Council web site includes a link to single page document that sets out the criteria for the inclusion of a building on the local list.

Eligibility Criteria

Authenticity

Scores

As appropriate for either of the following:

- a) Almost all original features retained- (3); or
- b) Most features retained- (2); or
- c) Some features retained- (1).

Architectural/ Artistic Interest

As specified for each of the following
d) an example of a style of building that is unique to the local area or a

	<p>good surviving example of an historic architectural style; (2)</p> <p>e) designed by notable local or national architects, engineers or designers; or an example of a particular technological innovation in building type, material or technique. (1)</p> <p>(maximum total = 3)</p>
Townscape significance	<p>As specified for each of the following</p> <p>f) building groups, including groups or terraces buildings, structures or features, which help form an attractive local character; (2)</p> <p>g) good examples of town planning layout; or notable buildings, or structures on important routes into the area, or key landmark buildings or features, which create a vista or contribute to the skyline; (1)</p> <p>(maximum total = 3)</p>
Historic/ Archaeological Interest	<p>As specified for each of the following</p> <p>h) strong community or socio-economic development significance, such as schools, institutions or an important part of the Borough's industrial and Military history; or (2)</p> <p>i) association with an important historic figure, local or national; or important local historic events; (1)</p> <p>(maximum total = 3)</p>
Total score	Recommendation
10-12	Inclusion in the Local List and also recommend for Statutory Listing to English Heritage (subject to Cabinet/Member's approval)
5-9	Inclusion in Local List (subject to Cabinet/Member's approval)
0-4	Not recommended for inclusion

Other guidance

Historic England Advice Note 1, Conservation Area Appraisal, Designation and Management (Second Edition) (February 2019)

- 2.30 The purpose of this note is to provide information on conservation area appraisal, designation and management to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment legislation, the policy in the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guidance (PPG). The advice in this document emphasises that evidence required to inform decisions affecting a conservation area, including both its designation and management, should be proportionate to the importance of the asset.
- 2.31 At paragraph 4 of the introduction it states, *‘Change is inevitable, and often beneficial, and this advice sets out ways to manage change in a way that conserves and enhances the character and appearance of historic areas’*, and that ‘Conservation areas can contribute to sustainable development in all its three dimensions as outlined in the NPPF.

Historic England: Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (March 2015)

- 2.32 The purpose of this note is to provide information to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guidance (PPG). These include assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding.
- 2.33 In terms of general advice on decision-taking it notes at para 4 that, *‘The first step for all applicants is to understand the significance of any affected heritage asset and, if relevant, the contribution of its setting to its significance’*. The guidance goes on to suggest a number of common steps in assessing significance.

The Setting of Heritage Assets: Historic England: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) December 2017

- 2.34 This guidance states that it provides *‘information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested*

parties' and that 'alternative approaches may be equally acceptable, provided they are demonstrably compliant with legislation, national policies and objectives.'

- 2.35 At para. 9 it states that *'Setting is not 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 the ability to appreciate that significance.'*
- 2.36 At para. 18 the guidance states that the *'Conserving or enhancing heritage assets by taking their settings into account need not prevent change; indeed change may be positive, for instance where the setting has been compromised by poor development.'* It goes on to say that *'many places coincide with the setting of a heritage asset and are subject to some degree of change over time.'*
- 2.37 The guidance proposes a five stage programme of assessment: (1) identifying the assets affected; (2) assessing the degree to which the setting make a contribution to the significance of a heritage asset or allows the significance to be appreciated; (3) assessing the effect of the proposed development; (4) maximising enhancement and minimising harm; and (5) making and monitoring the decision and outcomes.

Historic England Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage assets (October 2019)

- 2.38 The purpose of this note is to provide guidance on analysing the significance of heritage assets. It elaborates on the policy, guidance and advice set out in the NPPF and national PPG. It suggests a staged approach to assessing the effect of proposals on heritage significance which would usually include:
- 1. Understand the form, materials and history of the affected heritage asset(s), and/or the nature and extent of archaeological deposits*
 - 2. Understand the significance of the asset(s). These two stages fulfil the requirement in paragraph 189 of the NPPF and are undertaken by the applicant.*
 - 3. Understand the impact of the proposal on that significance. This stage fulfils the requirement in paragraph 190 of the NPPF and is undertaken by the LPA. However, the applicant needs to be aware of impacts so that the analysis of significance submitted to the LPA, under paragraph 189, is sufficient in its level of detail.*
 - 4. Avoid, minimise and mitigate negative impact, in a way that meets the objectives of the NPPF*
 - 5. Look for opportunities to better reveal or enhance significance'.*

3 THE SITE AND ITS HERITAGE CONTEXT

Location

- 3.1 Victoria Road is a long road that runs in a north-west/ south-east direction from the crossroads junction with Pembroke Road, Windmill Hill and Park Way to the north by the Site, to the roundabout with Field End Road and Eastcote Lane to the south-west.
- 3.2 Ruislip Manor London Underground Station, close to the Site towards the northern end of the street is on the Piccadilly and Metropolitan lines.

The Site and its immediate context

- 3.3 The site, nos. 11-17 Victoria Road lies on the east side of Victoria Road, north of Ruislip Manor London Underground Station. It comprises a parade of 4 single storey retail units.



The Site, nos. 11 to 17 Victoria Road, seen from the steps to the Pembroke Road Car Park

- 3.4 The land falls across the Site along Victoria Road from the north-west to the south-east and the threshold of each shop unit steps down with the drop. The simple brick parapet above maintains a uniform height being roughly twice as deep to the south at no. 17 compared to no. 11 to the north.

- 3.5 Nos. 11 to 17 all have modern shopfronts and fascias, of different designs, typical of the local area. Enver Freeman and Co. (no. 17) appears to retain the original office frontage. A simple precast stone detail runs atop each shopfront, stepping with it, below the uniform parapet height which is topped with a simple precast stone coping. A largely blank brick flank wall faces the station at no. 17 Victoria Road. The flat roofs of the units, each with a lantern, step down behind.



The Site from the north (left, facing) and south (right)

- 3.6 To the north the Site adjoins the 3 storey plus tall pitched roof interwar block which defines the southern corner of the crossroads junction of Victoria Road with Park Way.
- 3.7 To the south is Ruislip Manor London Underground Station separated from the Site by the single storey retail unit no. 19 Victoria Road. South of here is Ruislip Manor London Underground Station which is locally listed, see below.
- 3.8 The Site can be seen in views south along Victoria Road from the crossroads junction, beyond the 3 storey buildings in the foreground. It has limited visibility in views from the south, with glimpses of the modern shopfronts seen under the railway bridge.



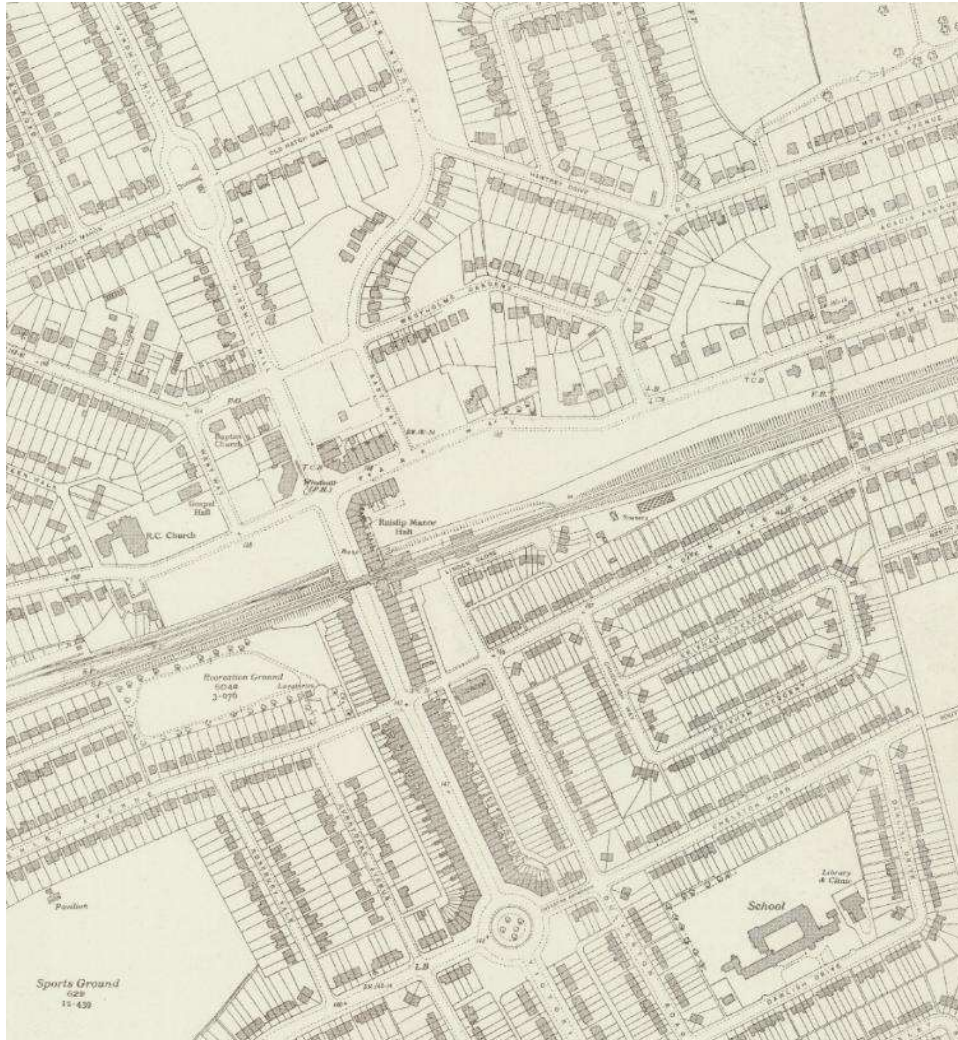
View towards the Site from the north-west corner of the crossroads junction



View towards the Site from the south of the station

Historic development of the area

The 1946 OS Map shows the interwar suburb as originally developed. The Site is marked with a blue star.



1946 OS Map (revised 1938 to 1939) 25 inch to the mile Reproduced with the permission of the National Library of Scotland

- 3.9 The Pevsner Volume for London 3: North West sets out a brief history of Ruislip as follows:

'Ruislip was the second largest mediaeval parish in Middlesex, including Eastcote and Northwood to the E and NE. C20 development has been extensive, but better planned than in many areas. The village character of the old centre around the church and Manor Farm, cherished by the new residents, is still recognisable, and an unusually large number of old farmhouses remain to the N (albeit mostly suburbanized), on the open land of Ruislip Common between the village of Northwood. The railway arrived at Ruislip in 1904, some way to the S of the village, and the first suburban expansion began in the following year along a new road linking the station to the old hamlet of

Kingsend, on land belonging to the chief landowner since the C15, King's College Cambridge. Further haphazard development followed after the opening of Northolt Junction (later South Ruislip) in 1908, and a year later came a more ambitious scheme by A. & J. Soutar for a garden suburb for the King's College land to the E of the village. This was incorporated into a progressive plan of 1914 by the Ruislip-Northwood U.D.C., but not entirely carried out. Building took place briskly between the wars to E, W, and S of the village, but Park Wood to the N, originally designated for superior detached houses, was preserved as open space.'

- 3.10 In respect of Ruislip Manor London Underground Station, a halt was built on the Metropolitan Railway here in 1912 which led to the development of Ruislip Manor on what was rural land. This was rebuilt as a station in 1938, designed by Holden, which is considered further below.

Local context

- 3.11 The area around the Site comprises interwar and early post-war suburban development as well as more recent infill development such as at the north-west corner of the crossroads junction with Windmill Hill and just north of the junction on the east side of Windmill Hill.
- 3.12 The crossroads just north of the Site as found today comprise interwar blocks to the south-east and north-east and an early post-war block to the south-west. The north-west corner, originally an interwar pub, has been recently redeveloped. Whilst the street layout at this point is regular with a formal quality, and all four blocks have angled frontages to the junction, the design of the individual buildings differs. The common feature is the use of brick, mostly red brick, with precast stone detail in the older buildings, and a more simple elevation design to the post-war and later buildings. These blocks are 3 storeys with tall pitched roofs.



View north/ north-east along Park Way



View of north-east corner of the crossroads



View north/ north-west up Windmill Hill



View south down Windmill Hill towards the Site



View east towards crossroads from Pembroke Rd



View west into junction with Victoria Road

3.13 Red brick and precast stone dominate south of the railway, where 2 and 3 storey parades make their way along Victoria Road to Chelston Approach/ Cornwall Road. These have retail and commercial ground floor units with apartments above. Like the crossroads to the north, this wide street has a formal quality. In views north it is the railway bridge across the street that announces Ruislip Manor London Underground Station, as opposed to the station building itself which is set back from the street and contributes little as part of the built edge to the street.



Views south along Victoria Road from south of the station

Heritage Context

- 3.14 The Site does not lie in a conservation area (nor does Victoria Road) and there are few heritage assets in the surrounding area. The adjoining Ruislip Manor London Underground Station is locally listed and a statement of significance of this is set out below. There is one listed building and one Conservation Area in a 250m study area from the centre of the Site.
- 3.15 The **Former Air Raid Precautions Building, Windmill Hall** is listed grade II and lies some 89m to the north-west of the Site. This gas de-contamination centre (later church hall) was built in 1941 by Ruislip and Northwood UDC to counter the expected gas warfare on civilians. The style is derived from Dudok and it is built of reinforced concrete clad in wirecut bricks in English bond with metal-framed casements and flat roof. With an L-shaped plan it is mainly 1 storey with a 2 storey tower to west. The north front has 4 narrow single metal-framed casements and a triple casement to the right with a projecting brick stringcourse underneath. The west tower (boiler room and water tank) has tall window on north face with a flat semi-circular shaped concrete lintel above. This utilitarian structure has a localised setting on Pembridge Road.
- 3.16 The Ruislip Manor Way Conservation Area lies some 200m to the north-west and was designated in 1989. No other information is given online for this conservation area. There is no intervisibility between it and the Site and this is not considered any further in this assessment.

Statement of significance

- 3.17 The National Planning Policy Framework defines heritage significance at 'Annex 2: Glossary' 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.'

- 3.18 The statement of significance below, in line with PPG paragraph: 006, considers the various heritage interests of Ruislip Manor London Underground Station as follows:

Archaeological interest *There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.*

Historic Interest *An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest*

not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.'

- 3.19 LB Hillingdon's criteria for locally listed buildings are set out at Section 2.
- 3.20 The following assessment of significance is based on on-site visual inspection, the local list description and the Council's guidance. It is proportionate both to the importance of the asset and to the nature and extent of the application proposals. They are sufficient to understand the potential impact of the Proposed Development on heritage interest.

Ruislip Manor Station Victoria Road, Ruislip, HA4 9AA (serial no. 212)

Description

- 3.21 Ruislip Manor Station, to the south of the Site, is locally listed. The 'Statement of significance/ Reasons for designation' prepared by the Council reads as follows:

'Architectural: Metropolitan Line Station by Charles Holden. 1938. Excellent detailing although the elevated bridge divides the overall composition. Three storey in brick, flat roof with parapet and stone coping. Metal windows, with cill details. Townscape: Key landmark, contributes to local character and street scene.'

- 3.22 The building was scored against the 'Eligibility Criteria and scoring for Locally Listed Buildings' as follows: 'Authenticity (I b): 2; Architectural (II d,e): 2+1; Townscape (III f,g): 2+1; Total = 8'
- 3.23 The map with the local listing shows that the local listing excludes the retail unit immediately to the north no. 19 Victoria Road, which lie between it and the Site.



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Extract of plan from the Council's local list entry

Historic Development

- 3.24 A halt was built on the Metropolitan Railway on what was rural land in Ruislip in 1912. This led to the development of Ruislip Manor Station and the current station, designed by Holden, was built in 1938. It has undergone alterations since including replacement windows.
- 3.25 The Pevsner Volume notes in respect of stations in Ruislip notes (our underlying), *'RUISLIP of 1904, dignified brick, he's one of the few remaining original stations on the Metropolitan line. RUISLIP MANOR is of 1938 by Holden. SOUTH RUISLIP on the Central line was opened in 1948. Cantilevered concrete platform canopies. Polygonal entrance hall with opaque clerestory, 1963 by F. F. Curtis; inside is a cast concrete abstract frieze. No description is given of South Manor Station, unlike South Ruislip'*

Description

- 3.26 This station is a modest structure with limited presence along Victoria Road the bulk of it set back from the street. It is essentially of a symmetrical design, siting either side of the raised tracks and comprises a single storey entrance/ ticket hall with set-back stair cores (with accommodation in the tops) providing access to platforms (covered in part). The single storey retail units to the south side have been included in the local listing (that to the north has not).
- 3.27 That part of the station fronting the street is essentially a single storey entrance lobby that runs beneath the railway tracks. A brick screen wall defines an unadorned 2 storey abutment to the raised tracks, with the LU roundel set on the brick pier of the steel bridge carrying the tracks across Victoria Road). Generous inset open lobbies lie either side, under slender canopies topped with later utilitarian balustrades, with entrance doors in the screen wall. Strip windows in the screen wall, above the height of the canopy, provide light into the ticket hall.



Ruislip Manor Station either side of the railway tracks and bridge – north (left, facing) south (right)



Northern entrance to Station with doors in screen wall



View towards Station from eastern end of southern platform

- 3.28 The whole is simply detailed externally with little features other than the LU signage.
- 3.29 Alterations include replacement windows, with louvers in the southern stair core top, as well as the addition of external plant.
- 3.30 Internally the ticket hall and the long stairs, with an integral seating area half way up the stairs, are of note and more architectural detail is apparent.



Ticket hall/ entrance – looking south



View from platform downstairs – south side



Integral bench on stairs – south side



View of the Site from the stairs looking across the shop unit excluded from the local listing

Townscape contribution

- 3.31 In terms of its presence along the street it is the bridge carrying the tracks over the road with the station name on it (and views of passing trains) that is most prominent and announces the station, as the main built elements set back from the street. As a result, as can be seen in the photographs below the station building does not have a landmark presence locally as is more common with stations where the street level is below the tracks. It lacks the presence as other LU stations, including others by Holden, where the station sits at the back of the footway with double height entrance halls etc.



View towards the station from Victoria Road, from the north (left, facing) and south (right)



View of railway bridge from Victoria Road, from the north (left, facing) and south (right)

- 3.32 Eastcote London Underground Station, also designed by Holden, is listed grade II and has a double height ticket hall. The list description notes it was listed '*as a complete and unique example of Holden's later evolution of the Sudbury Town style of station, lighter and more Scandinavian in feel than the earlier versions*' (no mention is made of Ruislip Manor Station, the next station to the west).

4 ASSESSMENT AND CONCLUSIONS

- 4.1 This Section assesses the effects of the Proposed Development on those elements of setting that contribute to the significance of heritage assets in the surrounding area. Section 3 sets out the heritage context of the Site and a statement of significance of the relevant heritage asset. There is only one heritage asset that will be affected by the Proposed Development – the locally listed Ruislip Manor London Underground Station.
- 4.2 Reference should be made to the DAS, application drawings and Planning Statement submitted with the application.

Planning history

- 4.3 Application ref: 2025/1096 at 11-17 Victoria Road Ruislip Manor was refused planning permission on the 20 June 2025. The council found that *‘The proposed development, by reason of its siting, scale, massing, and poor overall design, would result in a discordant and unsympathetic form of development that fails to respect the setting, character, and architectural integrity of the existing and attached building’*.
- 4.4 No harm was found to the setting of any heritage asset including the nearby locally listed Ruislip London Underground Station.
- 4.5 The applicant subsequently submitted a planning appeal ref: APP/R5510/W/25/3370257 which was dismissed on the 21 November 2025. Whilst the Inspector dismissed the appeal they gave very clear advice in respect of design matters. Contrary to the council the Inspector found the height and massing of the appeal scheme acceptable and only had concerns relating to detailed design matters stating (our underlying):

‘In some respects, the appeal proposal would respond positively to local context. The first and second floors would be set well behind the ground floor parapet, retaining its prominence in the street scene. The front elevation would step back from the adjacent terrace, echoing the articulation on the existing block. Continuing the eaves height of the neighbouring building above No.11 would provide visual consistency, and the step down above No.17 would follow the fall in level along the street. Although different to the pitched roof above the adjacent terraced block, the proposed flat roof design would reflect surrounding development and successfully bridge the transition to the distinctive flat roofed form of the underground station. The proposed top floor flat would be positioned well back from the parapet eaves line and appear recessive. Use of red brick would match the existing bricks on site and in the adjoining building

However, the adjacent terrace has a strong, vertical emphasis accentuated using stone quoins and a repeating pattern of tall narrow windows set close together. By contrast, the front elevation of the proposed development would feature several wide windows interspersed by smaller openings set within sizeable expanses of solid brick wall. This fenestration pattern and solid-void ratio would create a jarring horizontal emphasis out of keeping with the architectural rhythm and balance of the neighbouring building’.

- 4.6 The Inspector’s concerns related to detailed design matters only and specifically the fenestration pattern; both the proportion and arrangement of windows. The design of the fenestration pattern has since been revised in line with the Inspectors comments. In addition an entrance has been created in the existing parade off the main street, as set out in the Design and Access Statement and Planning Statement.

Proposed Development

- 4.7 The Proposed Development comprises the upward extension of the existing single storey parade on Site (nos. 11 to 17 Victoria Road) to provide 3 floors of residential accommodation above. The retail/ commercial units are retained and will appear as found today as seen from the street. The 7 apartments will be accessed from the front and there will also be an secondary access from the rear.
- 4.8 The extension, articulated as two elements, comprises two masonry floors with a metal clad top floor inset on all sides. The parapet of the larger northern section (above nos. 11 to 15) roughly aligns with the eaves of the Adjoining Block to the north and it is set back over 1.8m from the parapet (frontage) of the parade, and over 0.65m from the set back upper floors of the adjoining bay of the Adjoining Block. The southern section comprises a single bay, above no. 17, and steps further back in plan from the street by approximately 3.4m.
- 4.9 The fenestration and detailing of the street elevation has been revised in direct response to the Inspector’s comments (appeal ref: APP/R5510/W/25/3370257) to complement both the proportionality and rhythm of that to the Adjoining Building.
- 4.10 The top floor follows the same general arrangement. The southern flank is articulated with 2 windows, and the rear elevation, of a different but complementary design to that of the front (as found at the Adjoining Block), is also of an ordered design with a central expressed stair and lift core. The block as a whole has a cohesive appearance.
- 4.11 A new entrance has been formed from the southernmost unit on Victoria Road and will have a stone effect surround detail. The 1st and 2nd floors are to be clad in red multi brick to match the existing brick on Site and adjoining properties and have complementary stone effect detailing. The top floor or roof level is to be clad with

coloured aluminium cladding, and to the rear the escape stair is clad in matching aluminium cladding. The windows are aluminium framed. The 1st floor terrace to the street, roof terrace and the various terraces to the rear will have frameless glass balustrades.

Views

(The view images are on the following pages)

- 4.12 Two CGI views have been prepared by the architects to show how the Proposed Development would appear in local views. They are not AVR images but do provide a reliable indication of how the Proposed Development will appear in these views. Both views are from the opposite side of Victoria Road, one from the north of the Site and the other from the south; these can be found on the following pages.

South

- 4.13 In the existing view from the south there is a clear break between Ruislip Manor London Underground Station and the Site with the single storey retail unit nos. 18 & 19. Beyond is the deep parapet of the existing parade on Site and then views of the southern flank of the Adjoining Block.
- 4.14 The stepped massing and plan of the Proposed Development will be evident with the Adjoining Block remaining the prominent feature in the view, sitting at the crossroads junction. The Proposed Development will be in keeping with the scale of local development and comparable to recent blocks to the north (outwith the view). Ruislip Manor London Underground Station will not be obscured in views from here and the gap between the station building and the Site will remain.

North

- 4.15 In the existing view from the north Ruislip Manor London Underground Station can be seen in the background, in part above the Site, though the latter elements are principally brick walls. It is the LU roundel and bridge with the station name that mark its presence as well as its name on the entrance canopy.

View from the south

Existing



Proposed

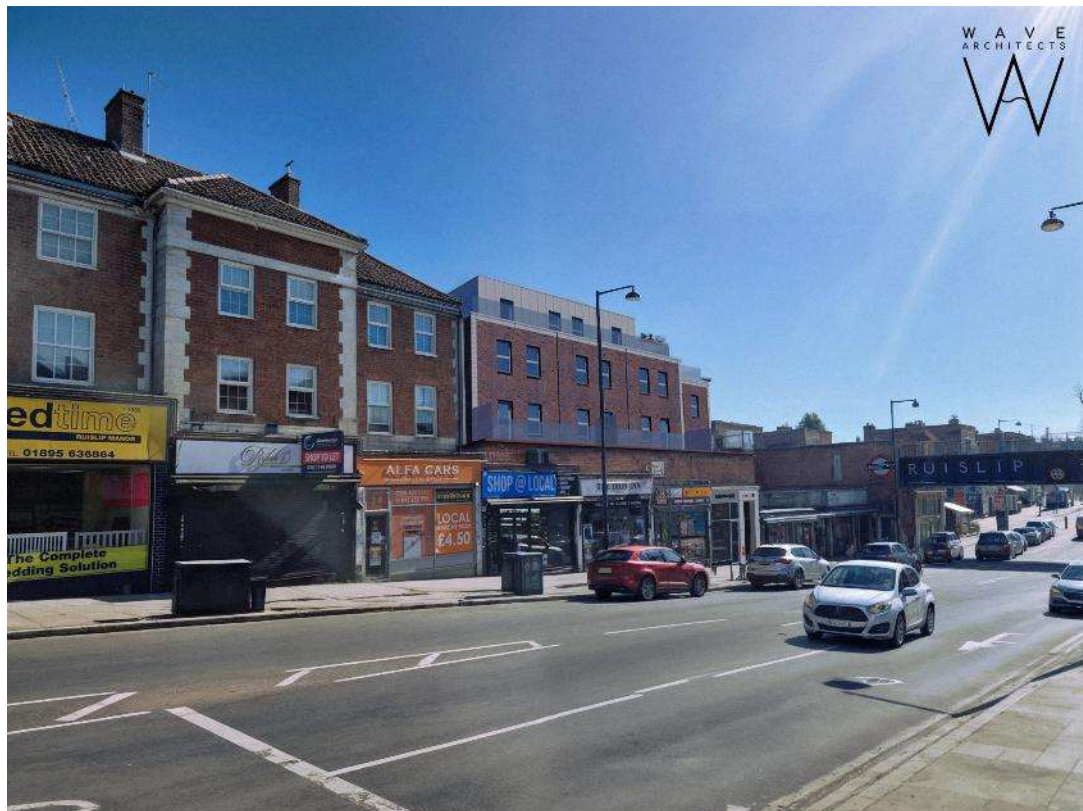


View from the north

Existing



Proposed



- 4.16 The stepped massing and plan of the Proposed Development will be evident with the Adjoining Block remaining prominent in the foreground at the crossroads junction, and the scheme stepping down in height and back from the street as it nears the Station. The inset top floor will appear recessive and the terraces will animate the building. The glazed tops (with replacement windows) of both the western ends of the main station building will remain visible, as will the entrance, screen wall, LU roundel and bridge crossing the street.

Assessment

- 4.17 The Proposed Development is well considered and based on a clear understanding of the Site and its townscape and heritage context. The design has been amended to address fully the Inspector's comments on appeal ref: APP/R5510/W/25/3370257. It is of an ordered design that responds to the Adjoining Building and that of the post-war and more recent apartment block development at the crossroads junction to the north.
- 4.18 The extension has been set back from the frontage of the Adjoining Block and aligns with its eaves at the northern end, stepping down and back further at its southern end towards Ruislip Manor London Underground Station. The top floor, set in on all sides and clad in metal has a clear roof-like character and there is a clear vertical hierarchy to the whole – the existing parade with its deep parapet provides the base, the two brick clad floors the middle, and the inset 3rd floor the top. This is the same approach found at the recent no. 50 Windmill Hill and the Crown Apartments to the north, and also complements the massing of the Adjoining Block, as well as the pattern of development on the opposite side of Victoria Road, up to the crossroads junction (nos. 2 to 12). The Inspector of appeal ref: APP/R5510/W/25/3370257 found the height and massing of the scheme wholly acceptable and considered they responded '*positively to the local context*'.
- 4.19 The revised street elevation is of an ordered design with a fenestration pattern that follows and complements both the proportionality and rhythm of that of the Adjoining Building in direct response to the Inspector's comments. The windows have vertical proportions, align vertically and continue the pattern of bays. In addition shadow gaps have been introduced to articulate the façade of the main block as three bays, complementing the façade rhythm of the Adjoining Building, and simple stone effect detailing introduced to the vertical corner edges and parapet of the street elevation as a contemporary interpretation of its quoins and eaves detail.
- 4.20 The new entrance from Victoria Road has been carefully formed in the southernmost unit (which has an uncharacteristic solid commercial frontage) with the door to the flats set in a stone effect surround and a new more glazed shopfront to the north that is in keeping with the character of the other commercial units.

- 4.21 High quality materials are proposed together with crisp detailing to ensure the scheme will appear of an appropriate quality and sit comfortably within its context.

Affects on heritage assets

- 4.22 The Site does not lie within or include any heritage assets. Any effects on heritage assets will all be indirect and on their settings. The heritage context of the Site is set out above at Section 3 and the Proposed Development will only affect the setting of one heritage asset - the locally listed Ruislip Manor London Underground Station. There are only two other heritage assets within a 300m radius of the Site but given their distance from the Site, the intervening townscape and the scale of development proposed there will be no effect on their settings.
- 4.23 The Proposed Development represents a polite addition to the local streetscape in keeping with the overall scale, height and appearance of development found locally as assessed above, with ordered façades and a clear vertical hierarchy. It has been designed to step down in height and back from the street edge to the south, towards Ruislip Manor London Underground Station. The massing is further articulated with the inseting of the top floor.
- 4.24 It is the bridge carrying the tracks over Victoria Road that provides a positive marker of the station with the station name written on both its sides. It is difficult to see how the station building itself can be considered to be a local landmark, as noted in the local listing (see Section 3) as it is set back from the street and basically comprises a covered bridge and two stair towers – there is no central feature onto the street as seen at the London Underground Stations at Eastcote and Rayners Lane, as the line is on an embankment (and not in a cutting) as Ruislip Manor.
- 4.25 The single storey parade on site is at odds with the prevailing height of development in the local context (there isn't one to the south of the station) and any upward extension of the Site will screen some views of the neighbouring station on approaching from the north. However, views from the south and nearby on the opposite side of the road will remain unchanged, as will those from the Pembroke Gardens car park. The stair tower does not act as the marker of the station, it is the blue bridge with the station name on it crossing Victoria Road that does this, and no views of this will be obscured.
- 4.26 Whilst some limited views of the station from a short section of Victoria Road to the north of it will be obscured, there will be no direct effect on this locally listed building, or on views from elsewhere, and its use as a station will remain and be clearly apparent in all local views due to the bridge that runs over Victoria Road. The building is best appreciated in views from nearby, and in particular from inside

where the various architectural details are apparent. The Proposed Development will not impact on the ability to do this.

- 4.27 The ground floor commercial frontage of the Site contributes to the setting of the station and this is retained largely as found - the experience of those walking along the east side of Victoria Road to the station from the north will be consistent with that found today, passing by these local shops and businesses.
- 4.28 It is our assessment that the Proposed Development will have a neutral effect on the setting of Ruislip Manor Station and that the Proposed Development is in line with the NPPF.

Council policies

- 4.29 In line with Policy '*DMHB 1: Heritage Assets*' the Proposed Development will conserve and not harm the setting of the locally listed Ruislip Manor London Underground Station and will make a positive contribution to the local character and distinctiveness of the area. It has been designed to be sympathetic to the setting of this non designated heritage asset, so as not to detract or compete with it and is appropriate in terms of its siting, style, scale, massing, height, design and materials. The Council did not find any harm on the setting of heritage assets in assessing application ref: 2025/1096.
- 4.30 The Inspector of appeal ref: APP/R5510/W/25/3370257 found the height and massing of the scheme wholly acceptable and the detailed design of the street elevation has been amended to address their comments.
- 4.31 In line with Policy '*DMHB 3: Locally Listed Buildings*' the Proposed Development will '*retain the setting*' of the locally listed building.
- 4.32 In line with Policy '*DMHB 11: Design of New Development*' point (iv), the Proposed Development will protect '*features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings*'.

NPPF tests

- 4.33 Notwithstanding our assessment that the Proposed Development will cause no harm to the setting of any heritage asset, should others disagree this harm could only be said to be of a low level and to one locally listed building. In the case of this non designated heritage asset and the test set out at para 216 of the NPPF any minor harm would be outweighed to a very large degree by the significant public benefits 7

new homes locally, adjacent to a tube station, would deliver. The public benefits of the scheme are set out in detail in the Planning Statement.

Conclusions

- 4.34 The Proposed Development, the detailed design of which has been revised following the Inspector's comments in the recent appeal decision ref: APP/R5510/W/25/3370257 has been carefully considered to relate positively to its context which includes one heritage asset, the locally listed Ruislip Manor Station. The massing and detailed design defer to the station, to the south of the Site and there will be no harmful effect on the setting of any heritage asset in the surrounding area. The Proposed Development is in line with the policies and guidance on heritage set out in the NPPF and PPG, local policies and guidance and HE guidance.

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