



HILLINGDON
LONDON



North Planning Committee

Date: THURSDAY, 12 JULY 2012

Time: 7.00 PM

Venue: COUNCIL CHAMBER -
CIVIC CENTRE, HIGH
STREET, UXBRIDGE UB8
1UW

**Meeting
Details:** Members of the Public and
Press are welcome to attend
this meeting

To Councillors on the Committee

Eddie Lavery (Chairman)
Allan Kauffman (Vice-Chairman)
David Allam (Labour Lead)
Jazz Dhillon
Carol Melvin
John Morgan
David Payne
Raymond Graham

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Published: Wednesday, 4 July 2012

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Petitions and Councillors

Petitions - Petitions - When a petition of 20 signatures or more of residents that live, work or study in the borough is received they can speak at a Planning Committee in support of or against an application for up to 5 minutes. Where multiple petitions are received against (or in support of) the same planning application, the Chairman of the Planning Committee has the discretion to amend speaking rights so that there is not a duplication of presentations to the meeting. In such circumstances, it will not be an automatic right that each representative of a petition will get 5 minutes to speak. However, the Chairman may agree a maximum of 10 minutes if one representative is selected to speak on behalf of multiple petitions.

Petitions must be submitted in writing to the Council in advance of the meeting. Where there is a petition opposing a planning application there is also the right for the applicant or their agent to address the meeting for up to 5 minutes.

If an application with a petition is deferred and a petitioner has addressed the meeting a new valid petition will be required to enable a representative to speak at a subsequent meeting on this item.

Ward Councillors - There is a right for local councillors to speak at Planning Committees about applications in their Ward.

Committee Members - The planning committee is made up of the experienced Councillors who meet in public every three weeks to make decisions on applications.

How the Committee meeting works

The Planning Committees consider the most complex and controversial proposals for development or enforcement action.

Applications for smaller developments such as householder extensions are generally dealt with by the Council's planning officers under delegated powers.

An agenda is prepared for each meeting, which comprises reports on each application. Reports with petitions will normally be taken at the beginning of the meeting.

The procedure will be as follows:-

1. The Chairman will announce the report;
2. The Planning Officer will introduce it; with a presentation of plans and photographs;
3. If there is a petition(s), the petition organiser will speak, followed by the agent/applicant followed by any Ward Councillors;
4. The Committee may ask questions of the petition organiser or of the agent/applicant;
5. The Committee debate the item and may seek clarification from officers;
6. The Committee will vote on the recommendation in the report, or on an alternative recommendation put forward by a Member of the Committee, which has been seconded.

About the Committee's decision

The Committee must make its decisions by having regard to legislation, policies laid down by National Government, by the Greater London Authority - under 'The London Plan' and Hillingdon's own planning policies as contained in the 'Unitary Development Plan 1998' and supporting guidance. The Committee must also make its decision based on material planning considerations and case law and material presented to it at the meeting in the officer's report and any representations received.

Guidance on how Members of the Committee must conduct themselves when dealing with planning matters and when making their decisions is contained in the 'Planning Code of Conduct', which is part of the Council's Constitution.

When making their decision, the Committee cannot take into account issues which are not planning considerations such as the effect of a development upon the value of surrounding properties, nor the loss of a view (which in itself is not sufficient ground for refusal of permission), nor a subjective opinion relating to the design of the property. When making a decision to refuse an application, the Committee will be asked to provide detailed reasons for refusal based on material planning considerations.

If a decision is made to refuse an application, the applicant has the right of appeal against the decision. A Planning Inspector appointed by the Government will then consider the appeal. There is no third party right of appeal, although a third party can apply to the High Court for Judicial Review, which must be done within 3 months of the date of the decision.

Agenda

Chairman's Announcements

- 1 Apologies for Absence
- 2 Declarations of Interest in matters coming before this meeting
- 3 Matters that have been notified in advance or urgent
- 4 To confirm that the items of business marked Part 1 will be considered in public and that the items marked Part 2 will be considered in private

Reports - Part 1 - Members, Public and Press

Items are normally marked in the order that they will be considered, though the Chairman may vary this. Reports are split into 'major' and 'minor' applications. The name of the local ward area is also given in addition to the address of the premises or land concerned.

Major Applications with a Petition

	Address	Ward	Description & Recommendation	Page
5	RUISLIP LIDO, RESERVOIR ROAD, RUISLIP - 1117/APP/2010/1997	West Ruislip	Construction of car park consisting of 150 parking spaces (as well as space for motor cycle parking). Re-consultation following receipt of revised plans, additional and amended supporting reports and amended application form. Recommendation: Approval, subject to no objections from Natural England and any additional conditions Natural England may seek to impose and the conditions as stated in the officer report.	1 - 62
6	Any Items Transferred from Part 1			

7	Any Other Business in Part 2
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Report of the Head of Planning & Enforcement Services

Address RUISLIP LIDO RESERVOIR ROAD RUISLIP

Development: Construction of car park consisting of 150 parking spaces (as well as space for motor cycle parking). Re-consultation following receipt of revised plans, additional and amended supporting reports and amended application form.

LBH Ref Nos: 1117/APP/2010/1997

Drawing Nos: E/A0 2425/30 REV. B (Tree Suevey)
E/A0 2425/29 REV. C
E/A0 2425/31 REV. H
E/A0 2425/32 REV. E (Planting)
E/A0 2425/41 REV. A
E/A0 2425/42 REV. A
REPTILE MITIGATION METHOD STATEMENT
Flood Risk Assessment
Addendum to Flood Risk Assessment
mmary note on Flood Risk Assessment
Transport Statement
Reptile Survey 2010
PLANNING STATEMENT
E/A3/2425/28 (REFUGE POSITIONS)
E/A3 2425/43 (Revised)
ECOLOGICAL MITIGATION STRATEGY

Date Plans Received: 26/08/2010 **Date(s) of Amendment(s):** 13/03/2012

Date Application Valid: 27/08/2010

1. SUMMARY

This application seeks full planning permission for the erection of a 150 space public car park on land at the western side of Ruislip Lido.

It is understood that the existing car park, which is leased on a long-term basis to the Water's Edge Public House, regularly reaches maximum capacity and that this results in overspill parking onto the surrounding roads. Accordingly, the proposed car park seeks to cater for this and future demand, reduce the amount of on-street parking in the surrounding area, particularly along Ducks Hill Road and Reservoir Road and to provide a safe environment for people to park when visiting the Lido. Its location also seeks to minimise the impact of the development on the ecology of the area.

In support of the application the applicant has provided detailed plans, a comprehensive Flood Risk Assessment, an Ecology Report and Reptile Survey, a Transport Statement, a Tree Survey and planting proposals and a Site Investigation Report.

Extensive public consultations were carried out for this proposal when that application was originally submitted in 2010, and further consultations were subsequently carried out in March 2012 and again in June 2012, following the submission of further information to support the proposal. 80 letters of objection and 3 petitions bearing 900, 52 and 42 signatures respectively were originally received objecting to the car park proposal. 103 individual responses, and two petitions bearing 164 and 80 signatures were received to

the second consultation in March 2012. Further consultations were carried out in June 2012, following receipt of updated Transport Statement and Ecological Report. The main areas of concern relate to lack of justification for the proposed development, the loss of green environment, increased traffic congestion, highway and pedestrian safety, impact on ecology and increased flood risk.

It is considered that there are sufficient special circumstances to justify an exception to Green Belt policy and, accordingly, there is no objection to the principle of the development in this location. It is not considered that the proposal will have an unacceptable impact on the surrounding highway network or on the ecology of the area. Furthermore it will not result in a risk of flooding at the Lido or downstream and it will not have any significant detrimental impacts on the amenity of occupants of the nearest residential properties.

The proposal is considered to comply with relevant UDP and London Plan policies in addition to objectives within the National Planning Policy Framework and, accordingly, approval is recommended.

2. RECOMMENDATION

Approval, subject to no objections from Natural England and any additional conditions Natural England may seek to impose and the following conditions:

1 T8 Time Limit - full planning application 3 years

The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON

To comply with Section 91 of the Town and Country Planning Act 1990.

2 DIS1 Facilities for People with Disabilities

All the facilities designed specifically to meet the needs of people with disabilities including parking provision for wheelchair users that are shown on the approved plans shall be provided prior to the commencement of use of the development and thereafter permanently retained.

REASON

To ensure that adequate facilities are provided for people with disabilities in accordance with Policy AM15 of the Hillingdon Unitary Development Plan Saved Policies (September 2007) and London Plan (July 2011) Policies 3.1, 3.8 and 7.2

3 DIS4 Signposting for People with Disabilities

Signplates, incorporating a representation of the Universal Wheelchair Symbol, should be displayed to indicate the location of convenient facilities to meet the needs of people with disabilities. Such signplates should identify or advertise accessible entrances to buildings, reserved parking spaces, accessible lifts and lavatory accommodation, manageable routes through buildings and availability of additional services. Signs for direction and location should have large characters or numerals and clearly contrast with the background colour.

REASON

To ensure that people with disabilities are aware of the location of convenient facilities in accordance with Policy AM13 of the Hillingdon Unitary Development Plan Saved Policies (September 2007).

4 H1 Traffic Arrangements - submission of details

Development shall not begin until details of all traffic arrangements (including where appropriate revised carriageway widening, footways, speed table, tactile paving, bollards, timber post and rail fencing means of surfacing (including resin bonded gravel surface)) have been submitted to and approved in writing by the Local Planning Authority. The approved development shall not be brought into use until all such works have been constructed in accordance with the approved details. Thereafter, the parking areas, sight lines and loading areas must be permanently retained and used for no other purpose at any time. Disabled parking bays shall be a minimum of 4.8m long by 3.6m wide, or at least 3.0m wide where two adjacent bays may share an unloading area.

REASON

To ensure pedestrian and vehicular safety and convenience and in compliance with Policy AM14 of the adopted Hillingdon Unitary Development Plan Saved Policies (September 2007) and Chapter 6 of the London Plan (July 2011).

5 NONSC Non Standard Condition

Development shall not begin until details of measures to substitute the existing taxi bay on Reservoir Road, in close proximity to the Lido entrance by a time limited accessible on street parking bay for Blue Badge holders have been submitted to and approved in writing by the Local Planning Authority. The development shall not be brought into use until the works which have been approved by the Local Planning Authority have been completed.

REASON

To ensure that people in wheelchairs are provided with adequate car parking and convenient access to the Lido, in accordance with Policy AM15 of the Hillingdon Unitary Development Plan Saved Policies (September 2007) and London Plan (July 2011) Policies 3.1, 3.8 and 7.2.

6 OM1 Development in accordance with Approved Plans

The development shall not be carried out otherwise than in strict accordance with the plans hereby approved including the proposed finished levels, unless consent to any variation is first obtained in writing from the Local Planning Authority.

REASON

To ensure that the external appearance of the development is satisfactory and to ensure the development does not increase the risk of flooding, in compliance with Policies BE13 and OE8 of the Hillingdon Unitary Development Plan Saved Policies (September 2007).

7 COM8 Tree Protection

No site clearance or construction work shall take place until the details have been submitted to, and approved in writing by, the Local Planning Authority with respect to:

1. A method statement outlining the sequence of development on the site including demolition, building works and tree protection measures.
2. Detailed drawings showing the position and type of fencing to protect the entire root areas/crown spread of trees, hedges and other vegetation to be retained shall be submitted to the Local Planning Authority for approval. No site clearance works or development shall be commenced until these drawings have been approved and the fencing has been erected in accordance with the details approved. Unless otherwise

agreed in writing by the Local Planning Authority such fencing should be a minimum height of 1.5 metres.

Thereafter, the development shall be implemented in accordance with the approved details. The fencing shall be retained in position until development is completed.

The area within the approved protective fencing shall remain undisturbed during the course of the works and in particular in these areas:

2.a There shall be no changes in ground levels;

2.b No materials or plant shall be stored;

2.c No buildings or temporary buildings shall be erected or stationed.

2.d No materials or waste shall be burnt; and.

2.e No drain runs or other trenches shall be dug or otherwise created, without the prior written consent of the Local Planning Authority.

REASON

To ensure that trees and other vegetation can and will be retained on site and not damaged during construction work and to ensure that the development conforms with policy BE38 of the Hillingdon Unitary Development Plan Saved Policies (September 2007).

8 COM10 Tree to be retained

Trees, hedges and shrubs shown to be retained on the approved plan shall not be damaged, uprooted, felled, lopped or topped without the prior written consent of the Local Planning Authority. If any retained tree, hedge or shrub is removed or severely damaged during construction, or is found to be seriously diseased or dying another tree, hedge or shrub shall be planted at the same place or, if planting in the same place would leave the new tree, hedge or shrub susceptible to disease, then the planting should be in a position to be first agreed in writing with the Local Planning Authority and shall be of a size and species to be agreed in writing by the Local Planning Authority and shall be planted in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier. Where damage is less severe, a schedule of remedial works necessary to ameliorate the effect of damage by tree surgery, feeding or groundwork shall be agreed in writing with the Local Planning Authority. New planting should comply with BS 3936 (1992) 'Nursery Stock, Part 1, Specification for Trees and Shrubs'

Remedial work should be carried out to BS 3998:2010 'Tree work - Recommendations' and BS 4428 (1989) 'Code of Practice for General Landscape Operations (Excluding Hard Surfaces)'. The agreed work shall be completed in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier.

REASON

To ensure that the trees and other vegetation continue to make a valuable contribution to the amenity of the area in accordance with policy BE38 of the Hillingdon Unitary Development Plan Saved Policies (September 2007) and to comply with Section 197 of the Town and Country Planning Act 1990.

9 COM9 Landscaping (including refuse/cycle storage)

No development shall take place until a revised landscape scheme has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include: -

1. Details of Soft Landscaping

1.a Revised planting plans (at not less than a scale of 1:100),

- 1.b Written specification of planting and cultivation works to be undertaken,
- 1.c Schedule of plants giving species, plant sizes, and proposed numbers/densities where appropriate

2. Details of Hard Landscaping
 - 2.a Litter bins
 - 2.b Cycle Storage
 - 2.c Means of enclosure/boundary treatments (including fencing and bollards)
 - 2.d Car Parking Layouts (including demonstration that 5% of all parking spaces are served by electrical charging points)
 - 2.e Hard Surfacing Materials
 - 2.f External Lighting
 - 2.g Other structures (such as furniture)

3. Details of Landscape Maintenance
 - 3.a Landscape Maintenance Schedule for a minimum period of 5 years.
 - 3.b Proposals for the replacement of any tree, shrub, or area of surfing/seeding within the landscaping scheme which dies or in the opinion of the Local Planning Authority becomes seriously damaged or diseased.

5. Schedule for Implementation

6. Other
 - 6.a Existing and proposed functional services above and below ground
 - 6.b Proposed finishing levels or contours

Thereafter the development shall be carried out and maintained in full accordance with the approved details.

REASON

To ensure that the proposed development will preserve and enhance the visual amenities of the locality and provide adequate facilities in compliance with policies BE13, BE38 and AM14 of the Hillingdon Unitary Development Plan Saved Policies (September 2007) and Policy 5.17 (refuse storage) of the London Plan.

10 NONSC Non Standard Condition

The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment (FRA) September 2011 and addendum and the following mitigation measures detailed within the FRA:

1. Limiting the surface water run-off generated by the 1 in 100 year plus climate change critical storm so that it will not exceed the run-off from the undeveloped site and not increase the risk of flooding off-site.
2. Provision of compensatory flood storage by reducing the lake outflow through the auxiliary overflow pipe to increase flood storage within the lake.
3. Planting of trees or installing bollards to prevent vehicles floating out of the car park in a flood event.

The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

REASON

1. To prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site.
2. To prevent flooding elsewhere by ensuring that compensatory storage of flood water is provided.
3. To prevent vehicles floating out of the car park and causing a blockage within the watercourse.
4. To comply with Policies OE7 and OE8 of the Hillingdon Unitary Development Plan Saved Policies (September 2007), London Plan (July 2011) Policy 5.12 and the NPPF.

11 SUS5 Sustainable Urban Drainage

Prior to the commencement of development, the recommended action of fitting a collar to the inlet of the auxiliary overflow shall be completed. This collar will be designed to reduce the pipe inlet by a minimum of 20% to increase the storage in the Lido to accommodate the loss of floodplain storage from the proposed development.

REASON

To comply with Policies OE7 and OE8 of the Hillingdon Unitary Development Plan Saved Policies (September 2007), London Plan (July 2011) Policy 5.12, the NPPF and the NPPF Technical Guidance Note.

12 NONSC Non Standard Condition

Prior to the occupancy of the development a flood warning and evacuation plan shall be drawn up for the overflow car park. The plan shall include measures and responsible parties for gaining information on intense rainfall likely to result in flooding. The plan shall also include the triggers, measures and responsible parties for ensuring the safe evacuation and closure of the site. The development must be operated and managed in accordance with the approved plan.

REASON

To minimise the risk of flooding to people and property in accordance with Policies OE7 and OE8 of the Hillingdon Unitary Development Plan Saved Policies (September 2007), London Plan (July 2011) Policy 5.12, the NPPF and the NPPF Technical Guidance Note.

13 NONSC Non Standard Condition

Details of trash screens at key points along the Cannon Brook, to prevent future blockages shall be submitted to, and approved in writing by the Local Planning Authority.

REASON

To comply with Policies OE7 and OE8 of the Hillingdon Unitary Development Plan Saved Policies (September 2007), London Plan (July 2011) Policy 5.12, the NPPF and the NPPF Technical Guidance Note.

14 OM19 Construction Management Plan

Prior to development commencing, the applicant shall submit a construction management plan to the Local Planning Authority for its approval. The plan shall detail:

- (i) The phasing of development works
- (ii) The hours during which development works will occur
- (iii) Measures to prevent mud and dirt tracking onto footways and adjoining roads (including wheel washing facilities).
- (v) Traffic management and access arrangements (vehicular and pedestrian) and parking provisions for contractors during the development process (including measures to reduce the numbers of construction vehicles accessing the site during peak hours).

- (vi) Measures to reduce the impact of the development on local air quality and dust through minimising emissions throughout the construction process.
- (vii) The storage of construction materials on site.

The approved details shall be implemented and maintained throughout the duration of the site clearance and construction process.

REASON

In order to minimise the safety risk of conflict between pedestrians and construction traffic, to safeguard the amenity of surrounding areas in accordance with Policies AM7 and OE1 of the Hillingdon Unitary Development Plan (Saved Policies 2007).

15 NONSC Non Standard Condition

Prior to the commencement of development, a scheme for the mitigation and enhancement of protected species and habitats must be submitted to and approved in writing by the Local Planning Authority. The scheme shall include the recommendations in the Ecological Mitigation Strategy (June 2012) and include details of ecological supervision for the works to be carried out in accordance with drawing G3274.001. In addition to the recommendations, the scheme shall clearly demonstrate proposals to improve Ponds 1 and 2 identified in the Amphibian survey. The development must proceed in accordance with the approved plan.

REASON

To protect and enhance wildlife in accordance with the NPPF and Policy 7.19 of the London Plan (July 2011).

16 COM29 No floodlighting

No floodlighting or other form of external lighting shall be installed unless it is in accordance with details which have previously been submitted to and approved in writing by the Local Planning Authority. Such details shall include location, height, type and direction of light sources and intensity of illumination. Any lighting that is so installed shall not thereafter be altered without the prior consent in writing of the Local Planning Authority other than for routine maintenance which does not change its details.

REASON

To ensure that the proposed development will preserve and enhance the visual amenities of the Green belt and locality and to protect the ecological value of the area in compliance with Policies OL5 and EC3 of the Hillingdon Unitary Development Plan Saved Policies (September 2007).

17 OM14 Secured by Design

The development hereby approved shall incorporate measures to minimise the risk of crime and to meet the specific security needs of the application site and the development. Details of security measures shall be submitted and approved in writing by the Local Planning Authority before development commences. The approved measures shall be implemented before the development is brought into use and thereafter retained.

REASON

In pursuance of the Council's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions; to promote the well being of the area in pursuance of the Council's powers under section 2 of the Local Government Act 2000, to reflect the guidance contained in the Council's SPG on Community Safety By Design and to ensure the development provides a safe and secure

environment in accordance with London Plan (July 2011) Policies 7.1 and 7.3.

INFORMATIVES

1 I15 Control of Environmental Nuisance from Construction Work

Nuisance from demolition and construction works is subject to control under The Control of Pollution Act 1974, the Clean Air Acts and other related legislation. In particular, you should ensure that the following are complied with:-

A. Demolition and construction works which are audible at the site boundary shall only be carried out between the hours of 08.00 and 18.00 hours Monday to Friday and between the hours of 08.00 hours and 13.00 hours on Saturday. No works shall be carried out on Sundays, Bank or Public Holidays.

B. All noise generated during such works shall be controlled in compliance with British Standard Code of Practice BS 5228:2009.

C. Dust emissions shall be controlled in compliance with the Mayor of London's Best Practice Guidance 'The Control of dust and emissions from construction and demolition.

D. No bonfires that create dark smoke or nuisance to local residents.

You are advised to consult the Council's Environmental Protection Unit (www.hillingdon.gov.uk/noise Tel. 01895 250155) or to seek prior approval under Section 61 of the Control of Pollution Act if you anticipate any difficulty in carrying out construction other than within the normal working hours set out in (A) above, and by means that would minimise disturbance to adjoining premises.

2 I49 Secured by Design

The Council has identified the specific security needs of the application site to be CCTV coverage. The development should seek to achieve ParkMark standards. You are advised to submit details to overcome the specified security needs in order to comply with condition 17 of this planning permission.

3 I52 Compulsory Informative (1)

The decision to GRANT planning permission has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

4 I53 Compulsory Informative (2)

The decision to GRANT planning permission has been taken having regard to the policies and proposals in the Hillingdon Unitary Development Plan Saved Policies (September 2007) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including the London Plan (July 2011) and national guidance.

AM14	New development and car parking standards.
AM15	Provision of reserved parking spaces for disabled persons
AM2	Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
AM7	Consideration of traffic generated by proposed developments.

AM9	Provision of cycle routes, consideration of cyclists' needs in design of highway improvement schemes, provision of cycle parking facilities
BE26	Town centres - design, layout and landscaping of new buildings
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
EC1	Protection of sites of special scientific interest, nature conservation importance and nature reserves
EC2	Nature conservation considerations and ecological assessments
EC3	Potential effects of development on sites of nature conservation importance
EC4	Monitoring of existing sites of nature conservation importance and identification of new sites
EC5	Retention of ecological features and creation of new habitats
EC6	Retention of wildlife habitats on derelict or vacant land
OE1	Protection of the character and amenities of surrounding properties and the local area
OL1	Green Belt - acceptable open land uses and restrictions on new development
OL2	Green Belt -landscaping improvements
OL5	Development proposals adjacent to the Green Belt
LPP 5.12	(2011) Flood risk management
LPP 7.16	(2011) Green Belt
LPP 7.19	(2011) Biodiversity and access to nature

5

The landscape proposals include some Oaks. Given the outbreak of Oak Processionary Moth in West London, Oak trees should be removed from the revised landscaping scheme, in order to avoid the risk of an outbreak of Oak Processionary Moth in Hillingdon and near to Ruislip Woods.

6 IT05 **Wildlife and Countryside Act 1981**

You are advised that a European Protected Species (EPS) licence is likely to be required in respect to the great crested newts, who may be present on site in small numbers at limited times of the year.

3. **CONSIDERATIONS**

3.1 **Site and Locality**

Ruislip Lido is located in Green Belt land. It includes a large man-made reservoir surround by semi-natural woodland, scrub and grassland habitat. It is managed as a recreational and educational facility for the community, with visitor attractions including a miniature (narrow gauge) railway, a cafe, a pub and a visitor's centre, plus associated toilet facilities. It is largely surrounded by Ruislip Woods National Nature Reserve (NPPF) and Site of Special Scientific Interest (SSSI), which it directly borders to the east, north and west.

The site occupies a small (approximately 0.5 hectares) area to the west of the Lido, located between the reservoir to its east and the miniature railway to its west. The site covers approximately 0.4 hectares and comprises an open grassed area of soft landscaping and mixed woodland. The area around the site generally comprises woodland and grassed areas of soft landscaping.

A miniature railway track bounds the site to the north west, beyond which is mixed grassland and woodlands known as Poor's Field. A pedestrian/cycle track bounds the site to the south east, beyond which is recreational grassland (Willow Lawn), leading to the bank of the Ruislip Lido which is some 30m from the site. A car park is present some 180m due south west of the site.

3.2 Proposed Scheme

This application seeks full planning permission for the provision of a 150 space car park on scrub land located towards the north west boundary of the Ruislip Lido and south east of the northern arm of the miniature light railway line.

Of the 150 spaces, 10 will be marked for disabled person use and 7 signed for brown badge holders. In addition there will be an identified area for motorcycle parking and cycle parking provision of 4 spaces through the provision of Sheffield style hoop stands (two cycles/stand). The car park would be accessed via Reservoir Road to the south.

It is proposed to provide extensive new tree and woodland shrub planting around the car park boundaries in addition to rows of trees and hedgerows within the car park.

The applicant states that the proposal to develop the car park is designed specifically to service the needs of large numbers of visitors to the Ruislip Lido at peak times, with the following principal aims:

- To mitigate the number of cars parking on Ducks Hill, Reservoir Road and other side roads near the venue.
- provide a basic level of accommodation within the lido location to meet the current and future needs of visitors to the Lido
- Provide a safe and sound environment for people to park when visiting the lido.
- To minimise the impact on the park's nature conservation.

The application is supported by a number of reports that assess the impact of the proposal. A summary and some key conclusions from these reports are provided below:

PLANNING STATEMENT

The statement provides a brief justification for the proposal and identifies key planning considerations.

TRANSPORT STATEMENT

The report outlines the existing conditions at the Ruislip Lido. This includes the identification of the extent, scale and impact of the existing parking related issues at the Lido. The proposals for providing a car park with 150 car parking spaces, a motorcycle parking area and 4 cycle parking spaces within the site are then identified.

A parking assessment is then undertaken for the parking improvement proposals, using relevant parking standards and information on the parking situation at Ruislip Lido. This is followed by examination of the construction management process for the proposed works, including management measures to minimise impacts during construction.

FLOOD RISK ASSESSMENT (FRA)

The FRA identifies the extent of the floodplain at Ruislip Lido and updates those

currently published by the Environment Agency. The FRA confirms no adverse impact on flood risk elsewhere from the planned improvements.

Based on the Flood Zones, mitigation measures are identified for the overflow car park proposal, to ensure no adverse impact on flood risk. The FRA concludes that the planned improvements are acceptable in terms of flood risk and that the flood risk can be sustainably managed in response to climate change. The FRA reveals that the proposed development will have no increase risk of flooding on properties in the area.

ADDENDUM TO FLOOD RISK ASSESSMENT September 2011

This report presents the results of the latest modelling to demonstrate any increases in flood level resulting from the planned improvements, mainly associated with a change in normal operating level, will not cause a measurable increase in flood risk downstream of the Lido, with the focus on properties just downstream of Howlett's Lane.

SUMMARY NOTE ON FLOOD RISK ASSESSMENT

This summary report presents the main findings of the Flood Risk Assessment.

SOIL SURVEY

Phase 1 and 2 geotechnical and geoenvironmental investigation to identify the potential for hazardous substances or conditions to exist on, at or near the site and therefore, to identify the necessity for and extent of mitigation measures to be employed in relation to the proposed development. No outstanding environmental or geotechnical issues have been identified by this study that would require any additional work in respect of the proposed end use.

ECOLOGICAL SITE APPRAISAL (AUGUST 2010)

The primary purpose of the survey was to identify any potential habitats and/or protected species that may be present and impacted upon by the propose development.

REPTILE MITIGATION METHOD STATEMENT (Report Ref: 3274.002) Version 1.0 June 2012

A Mitigation Method Statement to minimise impacts on reptiles and offset loss of reptile habitat as a result of the proposals. The Statement includes update surveys and an ecological assessment to support of the application.

3.3 Relevant Planning History

Comment on Relevant Planning History

Ruislip Lido is a man-made reservoir dating back to the nineteenth century. There have been numerous applications for minor development over the years, non of which are directly relevant to the current application.

4. Planning Policies and Standards

Hillingdon Unitary Development Plan Saved Policies (September 2007)
London Plan (July 2011)
National Planning Policy Framework

UDP / LDF Designation and London Plan

The following UDP Policies are considered relevant to the application:-

Part 1 Policies:

- PT1.1 To maintain the Green Belt for uses which preserve or enhance the open nature of the area.
- PT1.12 To avoid any unacceptable risk of flooding to new development in areas already liable to flood, or increased severity of flooding elsewhere.
- PT1.3 To seek greater public access to the countryside for informal leisure activities.
- PT1.5 To carry out and promote countryside management projects to improve the environment and nature conservation value of countryside and open land, particularly in areas which are degraded or derelict and important corridors along roads and watercourses.
- PT1.6 To safeguard the nature conservation value of Sites of Special Scientific Interest, Sites of Metropolitan Importance for Nature Conservation, designated local nature reserves or other nature reserves, or sites proposed by English Nature or the Local Authority for such designations.

Part 2 Policies:

- AM14 New development and car parking standards.
- AM15 Provision of reserved parking spaces for disabled persons
- AM2 Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
- AM7 Consideration of traffic generated by proposed developments.
- AM9 Provision of cycle routes, consideration of cyclists' needs in design of highway improvement schemes, provision of cycle parking facilities
- BE26 Town centres - design, layout and landscaping of new buildings
- BE38 Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
- EC1 Protection of sites of special scientific interest, nature conservation importance and nature reserves
- EC2 Nature conservation considerations and ecological assessments
- EC3 Potential effects of development on sites of nature conservation importance
- EC4 Monitoring of existing sites of nature conservation importance and identification of new sites
- EC5 Retention of ecological features and creation of new habitats
- EC6 Retention of wildlife habitats on derelict or vacant land
- OE1 Protection of the character and amenities of surrounding properties and the local area
- OL1 Green Belt - acceptable open land uses and restrictions on new development
- OL2 Green Belt -landscaping improvements

OL5 Development proposals adjacent to the Green Belt
LPP 5.12 (2011) Flood risk management
LPP 7.16 (2011) Green Belt
LPP 7.19 (2011) Biodiversity and access to nature

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- 13th April 2012

5.2 Site Notice Expiry Date:- 4th April 2012

6. Consultations

External Consultees

The application was advertised in the local press (8/9/2010). 282 neighbours in the surrounding area, local amenity groups and ward councillors were consulted on 31 August 2010. Site notices were erected at the entrance to the Lido and at the car park site on 3 September and again on 8 September 2010. 80 letters of objection and 3 petitions bearing 900, 52 and 42 signatures respectively were received to the initial consultation, objecting to the car park proposal. One letter of support from a local resident and one letter of provisional support was also received from Northwood Residents Association. The main issues raised are summarised below:

1. This will have a significant negative impact on Ruislip Lido and surrounding area.
2. During busy periods, Reservoir Road is extremely heavily congested and additional parking will exacerbate this problem.
3. A park and ride would be far more suitable.
4. People who visit the area leave extensive litter behind which is detrimental to the resident wildlife.
5. This is not the best way for Hillingdon council to spend money; it would be far better spent tidying up the lido and creating a nature reserve.
6. It will further increase vehicle access to lido, that is already on overload, in particular access off Ducks Hill Road and Reservoir Road. Any increase is potentially dangerous and definitely irresponsible.
7. The Lido and surrounding woods are a valued asset in the borough that needs to be maintained.
8. Concerned about the potential conflict of use that will arise on the road/path in the Lido grounds from the end of Reservoir Road to the proposed car park. This is part of the much appreciated path round the Lido. There are nearly always a number of wheelchair users and small children on tricycles or scooters. These would be particularly vulnerable to involvement in accidents with cars on this stretch of path.
9. Adding an extra car park will not help with the traffic congestion which, especially on a good weather summer day, can bring Reservoir Road to a halt, causing problems for the bus service, and, if they are needed, the emergency services.
10. With a pay and display system being enforced this will tempt more visitors parking down side roads
11. Traffic pollution, inconsiderate parking, and anti social behaviour from Lido visitors using/attempting to use Lakeside Close.
12. Impact on wildlife.
13. The area suggested is home to Muntjaks & Roe Deer and many other wild life species.
14. The proposal would expose the railway fencing when viewed from Willow Lawn.
15. The scheme will spoil the ambiance of willow Lawn.
16. It's use would only be required during Summer School holiday's, a 4-6 week period.
17. The land is at least 2ft below the existing road level.
18. It's position would highly pollute that area with car fumes, being opposite Willow lawn where the public picnic and play.
19. A public danger situation could easily arise with children, ball-games and vehicles all facilitating the same area.
20. The cost of such an unnecessary project at this time,
21. A more obvious location would be to extend the existing car park back further.
22. Any extra parking for the lido would be of enormous benefit, as it becomes ever increasingly popular. I believe this new car park would hugely benefit both the residents of the local area, and visitors to the lido.

REVISED APPLICATION

A further consultation was conducted on 23 March 2012, following the submission of additional information and modifications to the scheme. 274 local residents and amenity groups were consulted. An additional 110 local residents were consulted on 5 April 2012. 103 individual responses were received to this second consultation and the comments received are summarised below:

1. The red line should be amended to include the access road and the enlarged area of the application site.
2. The applicant has not demonstrated a need for the car park.
3. The reliance on Parking Contravention Notices on surrounding roads does not justify building the new car park.
4. Bus services should be improved instead.
5. The overspill car park is likely to lead to increased car trips, exacerbating traffic congestion on those few busy days of the year when the existing car park is full.
6. If the proposed car park would only be used when the existing car park reaches capacity, the actual times the car park would be opened is likely to be limited and undermines the need for providing it at all.
7. The applicant should submit a management plan indicating how often it is likely to be opened and how decisions would be made on its opening and closing times.
8. The proposed car park is inside the lido perimeter and will impact upon the quiet enjoyment of this open space.
9. Visitors to the lido will not be able to walk around the lido without being affected by traffic on the access road, which will cause increased noise, fumes/pollution and create obstructions.
10. There will be a risk of accidents occurring between car users and pedestrians within the lido area which is currently a traffic free environment.
11. Scarce resources should be put into re-instating full time staff at the Lido.
12. Why spoil an area of natural beauty, and one well served by public transport, just to cope with peak traffic in mid summer.
13. Not all the trees to be lost are shown on the Tree Survey drawing.
14. Trees shown to be removed for the toilet block should not be shown on this application.
15. We do not want further development in one of the few remaining areas of natural beauty, in greater London.
16. People will not want to use pay & display and will park outside resident's houses instead.
17. More litter will be left.
18. The location of the new car park will result in higher CO2 emissions affecting surrounding wild life.
19. The Green nature of the Lido today will be ruined by a car park within the environs of the Lido.
20. Pedestrians and vehicles will be travelling on the same thoroughfare.
21. Dozens of excited children pour off the train all day when the train is running they will be straight in to the path of cars.
22. This is a local park it is madness to dig it up and rip up the green environment so that for about 8 weekends a year, weather permitting, visitors mostly from outside the borough can park and not have to walk from 200 yards away in the overflow car park.
23. There is already too much traffic up and down a narrow local road. The road is already regularly blocked and buses and emergency vehicles are prevented from getting up and down.
24. We need to be providing more green environments with predicted environmental changes. Yet Hillingdon are ripping up flood plain to build Tarmac car parks. This proposal is wrong and strenuously oppose it.
25. A potentially good resolution to the ongoing parking issue at Ruislip Lido.
27. Who will be responsible for the gates which will allow access to this car park as there have always been issues regarding the overseeing of the current car park and the boy racers who use it for their wheel spinning fun?

28. To concrete over a large area of nature, destroying the views from willow lawn and the wildlife just for the sake of a few busy weekends in the summer is ludicrous. For the vast majority of the year, the existing car park is half empty.
29. The Lido is not large enough to cope with more visitors than it already gets on busy weekends and the council does not invest enough money in maintaining it as it is, let alone with more visitors.
30. If there is more car parking, there will be more visitors and an awful lot of the the people that go there are not from this borough!
31. To pretend that this space is separate from the National Nature Reserve and SSSI because it is on the other side of a wire fence is ludicrous.
31. 160 vehicles and a tarmac monstrosity will impact what is supposed to be precious natural environment.
32. The Ecological Appraisal downplays the existence of Slow Worm and Adder. There are also Great Crested Newts within 500 metres of the site.
33. The Ecological report ignores the area being suitable for a feeding area for bats.
34. The application should be subject to a Sequential Test in accordance with PPS25.
35. If no suitable alliterative sites are identified, an Exemption Test should be undertaken to provide a justification for the development in the floodplain.
36. The applicant should clarify its intentions with regard to the future operating water level at the Lido.
37. The applicant should clarify whether the 1:100 year with climate change level needs to be adjusted to take into account the proposed landfill and collar restriction on the outlet.
38. The applicant should carry out a comprehensive Risk Assessment.
39. The applicant should be required to undertake the recommended improvements to the Cannon Brook contained in the FRA to ensure that a regular regime is established for clearance of debris in the channel as a precondition to construction of the proposed development.
40. Building another car park is contrary to the Council's Climate Change Strategy.
41. The shared used path/access road leading to the proposed car park goes alienates physically disabled people and will discourage them to not use the same leisure facilities (Willow Lawn area, and path circling the lake) that more able bodied people are able to use.
42. The use of the proposed car park and access road would severely conflict with the events being held on Willow Lawn, due to the vast number of people moving about in this area including children running and playing.
- objective of providing additional car parking at peak demand times.

In addition to individual responses summarised above, the following petitions were received:

One petition bearing 80 signatures objecting to the proposal on the following grounds:
Loss of quality of life due to more complex and increased traffic flow, noise, disruption to public transport and pollution.

One petition organised by Friends of Ruislip Lido, bearing 164 signatures, objecting on the following grounds:

- It will spoil Willow Lawn, where children will be in danger; you will no longer be able to play ball games and our quiet picnics will be destroyed by noise ,pollution and more litter.
- Errors in the application
- Destruction of Willow Lawn
- Environmental damage
- Impact on safety
- Contrary to sustainability objectives
- Alternatives not considered

In June 2012, 556 local residents and amenity groups were consulted, following the receipt of a revised Transport Statement and updated Ecological Mitigation Method Statement. Any further responses to this latest consultation will be reported to Committee.

NICK HURD MP

There were errors in the supporting documents.

Comment: These were corrected through revised documents subject to full public consultation.

ENVIRONMENT AGENCY

The proposed development will only meet the requirements of the National Planning Policy Framework if the following measures as detailed in the Flood Risk Assessment dated September 2011 and the addendum submitted with this application are implemented and secured by way of a planning condition on any planning permission.

Condition

The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment (FRA) September 2011 and addendum and the following mitigation measures detailed within the FRA:

1. Limiting the surface water run-off generated by the 1 in 100 year plus climate change critical storm so that it will not exceed the run-off from the undeveloped site and not increase the risk of flooding off-site.
2. Provision of compensatory flood storage by reducing the lake outflow through the auxiliary overflow pipe to increase flood storage within the lake.
3. Planting of trees or installing bollards to prevent vehicles floating out of the car park in a flood event.

The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

Reason:

1. To prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site.
2. To prevent flooding elsewhere by ensuring that compensatory storage of flood water is provided.
3. To prevent vehicles floating out of the car park and causing a blockage within the watercourse.

ENGLISH HERITAGE

The present proposals are not considered to have an effect on any significant archaeological remains. The geotechnical logs show that modern man made ground is present beneath the depth for which the new car park surface needs to be excavated. Accordingly the natural or archaeological horizon will not be reached during the construction phase.

I would therefore advise that any requirement for pre- or post-determination archaeological assessment evaluation of this site in respect to the current application could be waived.

LONDON FIRE & EMERGENCY PLANNING AUTHORITY - No response.

NATURAL ENGLAND

Ruislip Woods Site of Special Scientific Interest (SSSI) / National Nature Reserve (NNR)
The application site is adjacent to the Ruislip Woods SSSI / NNR. This reply comprises our statutory consultation response under provisions of Article 20 of the Town and Country Planning

(Development Management Procedure) (England) Order 2010 and Section 28 of the Wildlife and Countryside Act 1981 (as amended).

Having considered the information provided and the potential environmental impacts resulting from the proposal upon the above designated site(s) Natural England considers that this application is unlikely to have significant implications for the SSSI / NNR. Consequently, we have no comments to make in respect of the designated sites at present.

Protected Species

The information supplied as part of the application includes details of the habitats on site, and of the following protected species.

Species	Protection legislation
Widespread Reptiles	The Wildlife and Countryside Act 1981 (as amended)
Great Crested Newts	The Conservation of Habitats and Species Regulations 2010

Paragraph 98 of ODPM Circular 06/2005 states that 'The presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat. Paragraph 99 also states that 'It is essential that the presence or otherwise of protected species and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision'.

Relevant legislation

Details of the legislation relevant to this application are included in Annex One appended to this letter. Natural England's comments relating to each species are provided in the following section(s).

Widespread Reptiles

We have adopted national standing advice for protected species. Standing advice is a material consideration in the determination of the proposed development in the same way as any individual response received from Natural England and should therefore be fully considered before a formal decision on the planning application is made.

Our Standing Advice Species Sheet - Reptiles provides advice to planners on deciding if there is a reasonable likelihood of reptiles being present. It also provides advice on survey and mitigation requirements.

Whilst a reptile survey has been undertaken, (Ruislip Lido Car Park Site Reptile Survey 2010) it does not appear to follow good practice guidelines. As such, we recommend that the Council consults our standing advice to ensure that a robust ecological survey and impact assessment, following good practice guidelines, has been undertaken to inform determination.

Great crested newts (GCN)

Great crested newts (GCN) are protected under Schedule 5 of the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations. This protection covers both the GCN themselves and the places that they use for breeding or shelter (including ponds and

associated terrestrial habitat). They can only be disturbed, or their places of shelter interfered with, under a licence issued by Natural England.

Under the Regulation 53 of the Conservation of Habitats and Species Regulations 2010, in order to obtain a license the following tests must be met:

- The consented operation must be for preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment;
- There must be no satisfactory alternative; and
- The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.

Our Standing Advice Species Sheet: Great crested newts provides advice to planners on deciding if there is a reasonable likelihood of GCN being present. It also provides advice on survey and mitigation requirements.

An indicator of the potential presence of GCN includes a pond on or near the site (within around 500 metres), even if it holds water only seasonally. The submitted Ecological Site Appraisal, (Halcrow Group Ltd., August 2010, pages 10-11), notes that there is a pond, where GCN have previously been recorded, within approximately 160 metres of the application site. Additionally, there is a pond with a recorded breeding population of GCN within 300 metres. The report concludes that the probability of GCN using the application site is considered negligible, given habitat conditions and obstacles to connectivity. Amphibians are thus scoped out of further study.

However, Natural England consider the habitat between the ponds and the site appears suitable for GCN, albeit with minor barriers to dispersal. In line with good practice, Natural England would expect to see an initial survey of the terrestrial habitats and quality of the ponds within and close to the site, ideally following the Habitat Suitability (HSI) methodology developed by Oldham et al. 20002. Natural England's Standing Advice refers. This would enable a robust habitat assessment to derive a probability of GCN being present within the ponds. We would recommend that such a HSI study is undertaken, prior to the determination of this application. Should further surveys be required based upon the HSI study, these should also be provided before determination of the application.

It should be noted that the appropriate time for such survey is between mid-March to mid-June. (Natural England's Standing Advice refers for further details).

Natural England has received third party anecdotal evidence of the presence of reptiles, including the adder, and GCN on the site. The Council should satisfy itself that it has taken into account all evidence of the presence / absence of reptiles and GCN on the site, including that provided by third parties, before determining this application.

It should also be noted that the protection afforded to species under UK and EU legislation is irrespective of the planning system and the applicant must ensure that any activity they undertake on the application site (regardless of the need for planning consent) complies with the appropriate wildlife legislation.

Other Protected Species

It is noted from the Ecological Site Appraisal (Halcrow Group Ltd., August 2010, Section 5), that an evaluation of the habitat potential to support bats and breeding birds is also provided. Natural England accepts the report's conclusions in this regard.

Summary and Conclusions

Natural England considers that this application is unlikely to have significant implications for the designated sites. Nonetheless, further information should be sought in regard to the potential presence of reptiles, including adder, and of GCN, prior to determination. The Council should satisfy itself that it has taken into account all evidence of the presence / absence of protected species, including that from third parties.

Officer comments: Additional surveys have been carried out and revised Ecological Mitigation Strategy submitted.

LONDON ESSEX AND HERTFORDSHIRE AMPHIBIAN AND REPTILE TRUST

We object to this application for the following reasons:

1) The presence of great crested newt (*Triturus cristatus*) at a breeding pond within 500m of the footprint of the proposed development has not been taken into consideration by the applicant. This species and its habitat (terrestrial and aquatic) receives full protection under UK and European legislation (the Wildlife and Countryside Act 1981 as amended and the 1992 EU Habitats Directive, for example.)

2) the Regional importance (Greater London) of the area immediately adjacent to the proposed car park for reptile species assemblage (all four native species in the region, namely adder *Vipera berus*, grass snake *Natrix natrix*, slowworm *Anguis fragilis* and viviparous lizard *Zootoca vivipara*, are present) has not been considered in the report by TEP "Reptile Mitigation Method Statement" which by its own admission only considers the impact on reptiles within the footprint of the proposed development. Hence there is no consideration given to the 'knock-on' effects of human overspill onto the NNR and key reptile habitat within the NNR due to displaced picknickers and users of the Lido. There is an extreme danger that habitat and protected species will subsequently be lost due to fire, both accidental and deliberate and persecution, as well as degradation of habitat and disturbance to these sensitive animals.

3) A juvenile adder (dead) was discovered during the preliminary site survey although this is not acknowledged in the consultant's report, raising the conservation status of the habitat within the proposed footprint itself.

4) the acknowledged presence of adder in the immediate vicinity has not been taken into account in terms of its regional significance - the NNR and surroundings represents one of only four proven adder sites within the whole of Greater London

5) the lack of consultation with local and specialist bodies, including LEHART and its predecessor LARG, which have been involved in reptile conservation at the site since the early 1990's, suggests a lack of interest in obtaining a complete and accurate picture of the importance of this area for protected species.

NORTHWOOD HILLS RESIDENTS ASSOCIATION

Northwood Hills Residents Association supports the need to create additional car parking for visitors to the Lido as we are aware that the current car park at peak times is not large enough to accommodate visitor vehicles, resulting in vehicles being parked outside residential properties in Reservoir Road and other roads in the vicinity of the Lido.

However, before giving our full support we would welcome clarification of any parking restrictions and any proposed charging structure for both residents and non-residents.

We would also like to see the Lido open to both residents and non-residents. Residents from outside the Borough would bring trade to the area.

RUISLP LIDO RESIDENTS ASSOCIATION

The site of the proposed car park adjoins a National Nature Reserve and Site of Special Scientific Interest. No professional research has been submitted with the planning documents on the potential effect of this development on the adjoining sites. Protected reptile species have been found on the proposed car park site and on the site footprint, including the slow worm, adder and crested newt (whose habitat is also protected).

One of the supporting documents, the Transport Statement by Waterman, contains several misleading errors. It states that the existing car park has only 200 spaces, when it has 260. It also states

in several places that the proposed site is currently a temporary overflow car park, which is completely incorrect. This calls into question the source and accuracy of the information used to compile this report.

No studies have been undertaken to see on how many days each year this facility will be needed. An area of woodland is being destroyed to create a facility that is likely to be only needed on a handful of days each year, and the rest of the time will sit empty apart from use by the railway staff, who could easily use the existing car park. Alternative sites with park and ride options should be considered instead, which will be less harmful to the environment of the area and the Lido itself.

Willow Lawn is currently an amenity grass area which is extensively used for picnics and ball games. We believe neither of these will be appropriate if this car park is built. Children will no longer be safe due to the proximity of traffic, and football and cricket games will endanger passing motorists. The proposed pedestrian path at the side of the new access road is too narrow for the amount of users on a busy day, which will then cause overspill into the road with safety implications. It is unclear how pedestrians who wish to continue round the accessibility path to the beach will be able to safely negotiate the stretch of road beyond the railway ticket office, and how wheelchair users, cycles and pushchairs will get round the gate which is planned to block vehicles from driving beyond that point.

Local roads already suffer severe pollution on busy days and this will now also affect Willow Lawn. Various research papers have been published on traffic pollution and its affects on health (eg by Colvile et al, and other papers). These include references to idling vehicles, and vehicles just starting up, emitting denser fumes, and the fact that children have a faster metabolic rate than adults and breathe more rapidly, and therefore take in more pollution. The only access road to the proposed site, Reservoir Road, is already severely congested on busy days, and cannot cope with the weight of traffic already using it. An extra car park will encourage more visitors to come by car rather than using public transport, and will put more strain on this road to the detriment of quality of life and health of local residents.

The proposed entrance to the new car park is at the busiest part of Reservoir Road. According to the plans submitted there will be traffic flowing in potentially seven different directions (including the bus) at the exact point where the bus turns, as well as hundreds of pedestrians crossing the road. It is not clear from the plans how cars leaving the existing car park will be able to enter the proposed one, as this route is undriveable without either driving over the pedestrian refuge or encroaching on another lane of traffic. The plans Hillingdon Council have submitted do not consider these problems and do not take into account the quantity of vehicles and pedestrians which will be in conflict in this small area. We ask that planning permission is not granted.

EASTCOTE VILLAGE CONSERVATION PANEL / EASTCOTE RESIDENTS ASSOCIATION

This comment is posted on behalf of The Eastcote Conservation Panel & Eastcote Residents Association. Whilst the need for this overflow car park is appreciated there are aspects of the design which give concern and should be resolved/amended before approval:- 1) It is proposed that

the surfacing is a not porous bitumen macadam. This is unsuitable and a porous surface should be adopted. This would preferably be Grass-Crete or similar to give a green unobtrusive appearance and good permeability. The Council requires all residents who are paving area of their front garden for parking to use permeable/semi-permeable surfacing and is setting a very poor example with this car parking area. 2) The flood survey says that the car park area is to be built up to reduce potential flooding depth and this will be compensated with an equal area of ground lowering elsewhere in the Lido. Where is this area and how will it be "treated"? Unless this is known and approved this application should be rejected. 3) There are no proposal for changes/improvement works to the entrance road (inside the Lido). Due to the above this application should be rejected in its present form.

METROPOLITAN POLICE CRIME PREVENTION OFFICER

The proposal should meet ParkMark standards. CCTV will be required.

Internal Consultees

POLICY AND ENVIRONMENTAL PLANNING

1. Site

The proposal site is adjacent to a Nature Conservation Site of Metropolitan or Borough Grade I Importance, National Nature Reserve, Site of Special Scientific Interest and is located within the Metropolitan Green Belt.

2. Background

On 27 March 2012 the Government published the National Planning Policy Framework (NPPF), a 47 page document which replaces most of the previous Planning Policy Guidance and Planning Policy Statements (PPGs and PPSs) which previously supplied much of the central government guidance on planning matters and which were material considerations in the determination of planning applications. The NPPF is now a material consideration (para 196 of the NPPF).

The NPPF largely carries forward existing planning policies and protections in a significantly more streamlined and accessible form. It introduces the presumption in favour of sustainable development and makes adjustments to some specific policies.

3. London Plan (adopted July 2011)

The London Plan strongly supports the protection, promotion and enhancement of London's open spaces and natural environments. Policy 7.16: Green Belt states that in terms of planning decisions:

The strongest protection should be given to London's Green Belt, in accordance with national guidance. Inappropriate development should be refused, except in very special circumstances. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt as set out in national guidance.

Parking

Policy 6.13: Parking of the London Plan states that The maximum standards set out in Table 6.2 in the Parking Addendum should be applied to planning applications. In addition, developments must:

- a ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles
- b provide parking for disabled people in line with Table 6.2
- c meet the minimum cycle parking standards set out in Table 6.3
- d provide for the needs of businesses for delivery and servicing.

Para 6A.1 states that if no standard is provided in either the London Plan or PPG 13 (now superseded by the NPPF) the level of parking should be determined by the transport assessment undertaken for the proposal and the availability of on and off-street parking.

Table 6.2 shows the requirement for blue badge space for recreational uses. It states that one space is required for each employee that is disabled and 6% of the total capacity should be for visiting disabled motorists, with a further 4% for future provision.

Table 6.3 for recreational uses states that 1 space per 110 staff + 1 space per 20 peak period visitors should be provided.

Main Policy Issues

The main policy issue in relation to this development is the impact of the proposal on the openness of the Green Belt and the visual amenities.

New development is only acceptable if it is essential facilities for outdoor sport and outdoor recreation, for cemeteries, and for other uses of land which preserve the openness of the Green Belt and which do not conflict with the purposes of including land in it.

PPG2: Green Belts has been replaced by the National Planning Policy Framework (NPPF).

The Section 9: Protecting Green Belt Land of the NPPF states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. (paras 79, 87 and 88)

Policies in Hillingdon's UDP Saved Policies (2007) are relevant depending on the on the degree of consistency with the NPPF policies.

Policy OL1 defines the types of development, which are considered acceptable within the Green Belt, namely agriculture, horticulture, forestry, nature conservation, open-air recreation facilities and cemeteries. The policy states that planning permission for the new building or for changes of use would not be granted, other than for purposes essential for and associated with these specified uses.

Therefore, very special circumstances will need to be provided to justify the change of use of land for use as a car park, to the extent that the harm on the openness of the Green Belt has been outweighed.

Flood Risk, Nature Conservation and Trees and woodland

The site lies within flood zones 2 and 3, adjoins the Copse Wood SSSI, Nature Conservation Site and is existing Metropolitan parkland within Ruislip Woods. Advice should be sought from the Sustainability Officer and Trees and landscape Officer.

Car Parking and Traffic

The applicants have included a Transport Statement. Traffic engineers need to be consulted and should be satisfied that the level of parking and the proposed access are acceptable.

Contaminated land

Advice should be sought from the Environmental Protection Unit, regarding the issue of its former land use and possible contamination of the historical water.

4. Conclusion

Officers should have regard to the overall impact of the proposed car park on the visual amenities of the Green Belt.

HIGHWAY ENGINEER

The proposals will provide a total of 150 car parking spaces of which 10 will be marked for disabled person use and 7 signed for brown badge holders. In addition there will be motorcycle and bicycle parking provision.

The access point and the access road will be improved, which includes provision of a foot way along the length of the access road as well as a pedestrian crossing facility in the vicinity of the miniature railway station and marking of the existing pedestrian crossing between the existing car park and the Lido area. The width of the access is largely acceptable to allow two-way traffic, however there is a pinch point proposed where the carriageway reduces to 3m resulting in a single lane. At this location a signed single-lane priority system for traffic is proposed, with traffic exiting the car park area having priority. Considering the likely high comings and goings, such an arrangement is not considered to be suitable, and could lead to situations where vehicles entering the car park area are waiting too long and having to push their way in to the car park. Amendments should therefore be secured by means of suitable condition to achieve a two-way carriageway at this location extending the foot way alongside the carriageway and a speed table with tactile paving on either side.

The proposals are supported by a transport statement. The existing parking conditions at Ruislip Lido can be very variable depending upon the time of year, day of week and the weather conditions. It is identified that there is existing heavy parking demand during peak periods, which results in the following issues

1. Roadside parking along Reservoir Road, including parking in inappropriate locations, such as in the vicinity of the bus turning area or bus stop.
2. Temporary parking use of the area that is now proposed to become a permanent car parking area. Access to this area is controlled by staff at the Lido area.
4. Direction of traffic to use the car parking at Breakspear Crematorium (in excess of 100 spaces).
5. Roadside parking along Ducks Hill Road and possibly other roads in the local area.
6. Difficulties for access and safe operation of the H13 bus service.
7. Use of on-street parking locations within residential areas leading to health and safety concerns among local residents.
8. Parking in inappropriate locations resulting in access and egress difficulties as well as damage to kerbs, trees, fences, walls etc.

The proposal is intended to alleviate the existing issues by providing an additional dedicated car park. Physical barrier control measures are proposed to enable access and use of the new car park to be controlled by staff at Ruislip Lido.

The scheme does not propose any changes to on street parking on Reservoir Road apart from amending part of the taxi-rank markings to enable a 30 minutes pick up and drop off facility for disabled people arriving in cars and/or minibuses, which is considered acceptable.

If the application is approved, a condition in addition to the one recommended above should be applied to secure a construction management plan and restrict delivery vehicles not to access and

egress the site between hours outside 9:30am and 4:30pm. In order to minimise the safety risk of conflict between pedestrians and construction traffic, it would be preferred for the construction works to be carried out during times when the Ruislip Lido usage is less.

TREE AND LANDSCAPE OFFICER

About half (western part) of this Green Belt site is wooded. The eastern part is grassland. The semi-natural (secondary/rejuvenating) broad-leaved woodland consists mostly of immature aspen, with birch, hawthorn and oak, with scrub on the eastern edge. Given that the largest of these trees form a clump in the middle of this area, it seems that the woodland has naturally regenerated from them. To the north of the site there is more immature semi-natural woodland, which includes more Oaks. To the west of the site and the railway, on the eastern edge of Poor's Field there is a line of very large, mature Oaks, which is, in terms of Saved Policy BE38, a landscape of merit.

Maps show that, in the mid-1860s, the land forming this site was on the eastern side of Poor's Field and was open. The only trees near to the site appear to be the line of Oaks. Later maps seem to show the site was part of Poor's Field, with scrub and a small clump of trees.

The immature, mostly Oak, woodland to the north of, and continuous with the immature Aspen/Birch woodland and scrub on part of the site, has some landscape/amenity value, and is retained. The immature woodland on the site, is a fairly recent addition to the landscape of the Lido near to Poor's Field, both of which are bordered north and south respectively by Ruislip Woods (semi-natural woodland, SSSI, NNR) and, as such, has a low landscape/amenity value.

The application includes a survey of the woodland larger trees on and close to the site. The scheme retains several of these trees, but most of the immature woodland and scrub is removed to facilitate the proposed development, and includes a landscaping scheme with many new trees in and lining the proposed car park and on to reinforce the existing linear clump of trees on the other (western) side of the drive. In the short-term at least, whilst the new trees and hedges will provide a buffer and low level screen, the line of mature Oaks on the fringe of Poor's Field will be more visible and conspicuous in a more open landscape.

The revised (2012) landscape proposals include some Oaks. Given the outbreak of Oak Processionary Moth in West London (not Hillingdon), it is advisable to remove Oak from this scheme in order to avoid the risk of an outbreak in Hillingdon and near to Ruislip Woods (mostly Oak and Hornbeam).

Overall and in the context of the Lido and the history of the local landscape since the reservoir/lido was developed, whilst the car park will be noticeable, the scheme will not have a harmful landscape impact.

Subject to the suggested revision to the landscaping (tree planting) proposals and conditions COM10, COM8 and COM9 (modified to refer to the implementation of the approved scheme), the revised (2012) application is acceptable in terms of Saved Policy BE38 and relevant Green Belt (landscape) policy.

SUSTAINABILITY OFFICER

Flooding

Background

Ruislip Lido has historically acted as a large scale flood attenuation structure. The water levels were maintained at certain levels to allow for flood storage in times of heavy rain. A flood risk assessment (FRA) has been submitted with the application for the car park. The introduction to the

FRA provides a brief justification as to why one is needed:

Ruislip Lido is a man-made reservoir dating back to the nineteenth century. It was alleged that in the late 1980s water discharged from the Lido was partly responsible for flooding downstream along the Cannon Brook (receiving watercourse for outflows from Ruislip Lido); to prevent any re occurrence the water level has since been lowered (by up to a meter).

There was generally no engineering evidence or flood modelling to provide an understanding of the role of the Lido in flooding in the 1980s. Instead a precautionary approach was adopted and the operating water level in the Lido was lowered to allow a considerable amount of capacity to store additional water should it need to. The FRA states:

It is understood that the decision to change the operating level of Ruislip Lido, by drawing it down to 1m below the original design datum level, was first made in 1993 by the management advisory group and after discussions with the National Rivers Authority (now Environment Agency).

From records held by LB Hillingdon, it appears that the technical justification for the change in normal operating level is limited to multiple page calculation dated 26 September 1991 and subsequent letter dated 22 October 1991 from the National Rivers Authority (now Environment Agency).

The operating level between 1992 and 2008 was not deemed to be an optimum level for recreational or environmental conditions. In 2008 a change to the operational level was made to allow water levels to be maintained at 0.65m below the initial Lido discharge point (a small spillway that discharges into the Cannon Brook).

This new operating level was based on the initial Lido flood risk assessments and a more complex piece of work completed by the Environment Agency on the River Pinn which considered levels in the Lido to a limited degree.

The FRA accompanying this application is a further more detailed piece of work specifically related to the operating levels in the Lido and the planned improvements including the car park application.

The Council considered further operational water level changes and this FRA was to support any subsequent decision.

Purpose of the FRA

The FRA is not only related to the planning proposals. The FRA is linked to the proposed development as it provides a more accurate understanding of the flood risk in the area. The FRA would have been needed regardless of the proposed development to allow operational water levels to be properly understood.

Earlier discussions with the National Rivers Authority resulted in the 1m+ below the auxiliary spillway level. The NRA also suggested that a more comprehensive appraisal be undertaken to determine the most suitable operating level, considering flood risk, the environment and recreation.

The FRA submitted with the application provides an updated and detailed assessment to better inform the operation of the Lido water levels. The FRA allows a decision to be taken on the most suitable water level that does not increase flood risk, but enables optimum environmental and recreational conditions to be set.

Results of the FRA

The FRA concludes that the operating water level set in 2008 (0.65m below) is the optimum level without increasing flood risk downstream. It acknowledges that the Council considered options for a further raising of the operating water level (0.5m below) but advised against this.

The Lido provides significant attenuation for flood water and there is no increase in flood risk downstream by storing water at 0.65m below its datum level rather than 1m below. This datum level is based on the Lido's 0.6m diameter outlet pipe.

The modelling that informs the FRA considers a variety of storm events, whether short term inundations over 6 hours or long term storm events of 48 hours. In both instances the FRA finds there is no increase in flood risk with the initial operating water level being held at 1m or 0.65m below datum.

The FRA concludes that there is no decrease in flood risk, if the water levels are lowered to 1m below. However, at this level the recreational and environmental conditions in the Lido become adversely impacted.

Cannon Brook

The FRA and the FRA Addendum consider the impacts downstream particularly where flood risk has been mapped by the Environment Agency, as shown in the figure below (taken from the FRA). This mapping is taken from broad surveys that do not consider the finer details of the area. As a consequence, the updated modelling provides a more accurate representation of the likely flood risk.

Flood risk is indicated at Bury Street (A4180) and further downstream between Howletts Lane and Ladygate Lane. The FRA concludes that the flood risk at Bury Street is overstated and the flood risk at Ladygate Lane is associated with Mad Bess Brook. This joins the Cannon Brook upstream of a road culvert.

Historic Flooding

There were flood events on the Cannon Brook that were attributed to the storage levels in the Lido. There were claims that the Lido discharged significant quantities of water into Cannon Brook in times of heavy rain. However, there was no lowering of the water levels (drawing down) prior to the heavy rain. As a consequence the storage capacity in the Lido was constrained resulting in the discharge to the Cannon Brook.

The Cannon Brook was also likely to be heavily influenced by the confluence of the Mad Bess Brook. The two brooks merge in the area of Ladygate Lane. The discharge from the Lido and the flows from Mad Bess Brook were likely to have put too much pressure on the limited channel, particularly at the road culvert, on the Cannon Brook. This was the likely cause of the flooding. Subsequently, the Lido is operated at a level well below the spillway (where the discharge in the 1980s came from). The FRA states:

At that time the Lido level was not in a drawn down state before these events, i.e. no flood attenuation. The current operating regime that holds the water level below the spillway means flood storage is now available to prevent the Lido outflow contributing in the same way as in previous flood events.

Conclusion

The historic flooding and subsequent modelling has shown that there must be capacity for storage in the Lido and no discharge should occur at times of peak flow downstream in the Cannon Brook, where the main inflow is from the Mad Bess Brook. As a consequence, the water level in the Lido must be maintained below the spillway.

The FRA concludes that an operating level of 0.65m below datum (outlet pipe) has minimal impact on flood risk downstream and would optimise environmental and recreational conditions.

Flood Risk Comments: Proposed Car Park Development

Sequential Test

The Council aims to direct all new development to areas at a low risk of flooding. In accordance with the National Planning Policy Framework Technical Guidance, the Council should carry out a flood risk sequential test for all development proposed in flood zones 2 and 3.

The Environment Agency's flood zone maps show the site not to be in an area of flood risk. However, the FRA has provided a more accurate representation of flooding on the Lido and shows that the development site and surrounding area could experience flooding in a 1:100year (+ climate change) event. In the accordance with the sequential test, the Council must be satisfied that there is no other appropriate location for the car parking.

Maps show the broad location of the site in relation to the newly modelled floodplain. The level of flooding only becomes of significant depths (1m+) plus in the extreme 1:1000year event (flood zone 2) although there will be some flooding (majority below 0.5m) in the 1:100year event. The maps show similar levels of flood risk immediately surrounding the proposed site.

Need for the Development

The proposed development is required to provide a more formal and safe parking area for Lido visitors. In particular it will:

- Provide additional car parking capacity, to the existing provision which has reached to a saturation point
- Address health and safety concerns of local residents with cars being parked in nearby major and side roads
- Avoid damage to curbs, trees, fences, walls etc | through cars being parked unsafely

Geographical Extent of Site Search

The sequential test should be extended to consider all suitable sites in flood zone one. The definition of suitable needs to be assessed on a case by case, and needs to consider the geographical requirements of the development. In this instance, the proposed development must be placed in close proximity to the Lido and the search for other suitable sites should not extend beyond the Lido extent.

Sequential Test

In reviewing the area around the Lido, there are locations at less risk. However, these have further constraints. The map below shows the extent of a Site of Special Scientific Interest which surrounds the lido. This is the highest level of nature conservation designation and effectively means no development can take place.

The map and aerial photograph below also highlights three areas where the SSSI does not extend which have been considered in the sequential test.

Area 1

This is outside the ownership of the Council and the curtilage of the Lido. It is therefore consider unavailable and therefore not suitable.

Area 2

This is outside the SSSI but as the aerial photograph shows, would required the removal of a significant amount of trees north of the existing car park. This belt of trees forms part of the SSSI, but does not benefit from the SSSI designation. Based on the ecological information submitted as part of this proposed development, and the surrounding designation, this is likely to be an area with a high ecological value.

Area 3

Although this area is not shown at risk of flooding due to land levels, it is not considered appropriate for the car park. This site is situated on the immediate boundary of the Lido and in an area where traffic would be unacceptable. It is also likely to have a significant ecological value as it is the area where water means the land.

Conclusion

Flood risk needs to be considered in relation to the sensitivity of a proposed development. In this instance the overflow car parking is not considered to be overly sensitive in terms of flood risk. The NPPF Technical Guidance Note defines car parking as low vulnerable use although it is acknowledged that people and property could be at risk in times of flooding. This risk is reduced due to the likely use of the site in times of heavy rain. Nonetheless, there is a residual risk that requires the Council to consider the location of the development.

The development must go near the Lido, but there are minimal sites at a lower risk of flooding. Potential alternatives in terms of flood risk are heavily constrained by ecological designations or are impractical for other reasons. The development site is considered to be the most suitable site given the low vulnerable nature of the proposals and the lack of suitable alternative sites.

Flood Risk Management

Although the development is considered to be of a low vulnerable nature there is a residual risk of flooding that needs to be managed. The FRA demonstrates that the increase in hard standing and therefore runoff, can be attenuated through providing further capacity in the Lido. The FRA states:

An alternative form of compensatory storage is proposed, which involves reducing slightly the lake outflow through the auxiliary overflow pipe to increase flood storage within the lake. This can easily be done by placing a collar across the pipe at its inlet to reduce the pipe diameter and limit the outflow from the pipe.

In addition, a flood warning and evacuation procedure will need to be drawn up prior to occupancy to further minimise the risk to people and property. The following conditions are required:

Condition

Prior to the commencement of development the recommended action of fitting a collar to the inlet of the auxiliary overflow shall be completed. This collar will be designed to reduce the pipe inlet by a minimum of 20% to increase the storage in the Lido to accommodate the loss of floodplain storage from the proposed development.

Reason

To minimise the risk of flooding to people and property in accordance with the NPPF and NPPF Technical Guidance Note

Condition

Prior to the occupancy of the development a flood warning and evacuation plan shall be drawn up for the overflow car park. The plan shall include measures and responsible parties for gaining information on intense rainfall likely to result in flooding. The plan shall also include the triggers, measures and responsible parties for ensuring the safe evacuation and closure of the site. The development must be operated and managed in accordance with the approved plan.

Reason

To minimise the risk of flooding to people and property in accordance with the NPPF and the NPPF Technical Guidance Note.

Summary

- The FRA provides updated information on the most suitable levels in the Lido that consider environmental, recreational and flooding conditions.
- The FRA demonstrates that the decision made in 2008 to operate the level at 0.65 below the auxiliary spillway will not increase flood risk.
- The FRA demonstrates that historic flooding on the Cannon Brook was due in part to discharging of water from the Lido as well flows from Mad Bess Brook.
- The FRA demonstrates that if water can be maintained below the level of the Spillway and 0.65m below there will be no discharge from the Lido during peak flows in the Cannon Brook downstream.
- The sequential test has revealed there are no suitable alternative sites available for siting the overflow car park.
- The FRA reveals that the proposed development will not increase the risk of flooding on properties in the area by recommending further capacity be created in the Lido by restricting the auxiliary overflow pipe.
- The FRA reveals that there is still a potential flooding problem downstream due to a small road culvert on the Cannon Brook at Ladygate Lane.
- The FRA suggests that further flood risk management work is done on the problem areas on the Cannon Brook in order to reduce the possibility that the road culverts could become blocked, but these are not related to the Lido levels.

Ecology

The following comments are based on the information presented in the report and initial discussions with Natural England. The ecology reports have been assessed on their merits and the following is based on the approach to be adopted based on the conclusions of these reports. Natural England has yet to provide formal comments and therefore the following is subject to any further advice and comments from Natural England. The comments in relation to the Habitats Directive are made on my assessment of the ecological reports and findings within.

Background

The development site is situated in an area designated as a Metropolitan Site of Importance for Nature Conservation (SINC). It also borders a Site of Special Scientific Interest (SSSi). This makes the area on and around the site to be of a high quality in terms of ecology and nature conservation.

- The applicant has submitted a series of ecological reports to ensure:
- The decision making fully considers impacts on protected species
- That the risk to protected species is understood and that actions will be put in place to manage the risks.
- That any onsite harm can be mitigated through enhancement works.

Policy

The site is not within the SSSi, but it does border it. Natural England will need to provide comments on the direct impacts of the site and whether it impacts on their ability to manage it.

The site is also designated a Metropolitan SINC. London Plan Policy 7.17 states that:

On Sites of Importance for Nature Conservation development proposals should:

- (b) give strong protection to sites of metropolitan importance for nature conservation (SMIs). These are sites jointly identified by the Mayor and boroughs as having strategic nature conservation importance

In addition, the National Planning Policy Framework states:

That the planning system should contribute to and enhance the natural and local environment by: minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

The best form of mitigating harm to nature conservation sites is to avoid it. Therefore in determining the application the Council needs to be satisfied that 1) the development is necessary 2) that there is no suitable alternative to developing this site and 3) that there is suitable mitigation and enhancement measures to minimise the harm.

Need for the Development

As stated previously, the consideration of the ecological impacts needs to be determined in relation to the need for the development.

The development is required to alleviate a growing concern regarding car parking for users of the Lido. The Lido is an important recreational space for the borough and is highly valued. The future use of the Lido is likely to rise which is supported by the borough for social and recreational reasons. However, the existing car parking arrangements is constraining the safe increase in the number of users. The transport assessment has identified the following:

- Roadside parking along Reservoir Road, including parking in inappropriate locations, such as in the vicinity of the bus turning area or bus stop.
- Temporary parking use of the area that is now proposed to become a permanent car parking area.
- Access to this area is controlled by staff at the Lido area.
- Direction of traffic to use the car parking at Breakspear Crematorium (in excess of 100 spaces).
- Roadside parking along Ducks Hill Road and possibly other roads in the local area.

As previously identified the issue of inappropriate parking at busy times does cause a number of issues.

- These issues include:
- Difficulties for access and safe operation of the H13 bus service.
- Use of on-street parking locations within residential areas leading to health and safety concerns among local residents.
- Parking in inappropriate locations resulting in access and egress difficulties as well as damage to kerbs, trees, fences, walls etc.

The car park is therefore required to:

- provide additional car parking capacity, to the existing provision which has reached to a saturation point
- address health and safety concerns of local residents with cars being parked in nearby major and side roads
- avoid damage to curbs, trees, fences, walls etc through cars being parked unsafely
- meet a growing demand for the recreational use of the Lido

Ecological Report Findings

The decision on harm needs to be considered in relation to the likely ecological impacts. The Council accepted the possible sensitivity of the site and the surrounding area and commissioned a suite of ecological reports to inform the decision making. The findings of these reports will provide the necessary weight to be given to ecological protection and mitigation in making a subsequent decision:

Bats

The proposal is to retain all existing mature trees with clearance limited to ground foliage, saplings

and general scrub areas. The ecology report found that the development will have a negligible impact on bats and will not result in the loss of trees with potential bat roosts.

The area around the car park site is considered to be of optimum quality for bats. Therefore the loss of a small scale foraging areas is considered not to have detrimental impact on bats.

Reptiles

The 2010 phase 1 habitat survey recommended further reptile surveys. These were undertaken in June 2012. The reports found that the site was of limited quality for reptiles, with only one grass snake and one slow-worm (both UK protected species) being recorded.

These species are protected against killing, but their habitat and foraging areas should also be considered important in making a planning decision. The car park was noted as providing only limited basking opportunities, whilst the surrounding areas are considered to be of greater quality for foraging, refuge and hibernation.

Amphibians

An amphibian survey was carried out between May and June 2012 following earlier recommendations from previous ecology reports. This identified a number of ponds/lakes within 500m of the development site. Ponds located offsite and away from a development are only considered to be a concern if they provide suitable habitat for newts and in particularly great crested newts.

Great crested newts are a European protected species and are generally considered to have a range of 500m from their breeding ponds. The amphibian survey identified two ponds with the potential to support great crested newts. These are shown on the extract from the amphibian survey:

Of the two ponds surveyed in detail, pond 1 was not found to support a population of great crested newts but did support smooth newts (protected from being sold only).

Pond 2 is of particular concern because the car park site offers potential hibernation and foraging areas for great crested newts. Although the pond was not considered to support high numbers of great crested newts (8 were recorded), there is still the potential for the development site to be considered suitable habitat (foraging and hibernation). The development will therefore result in the loss of about 0.6hectare of great crested newt habitat.

Mammals

The site was appraised for Badger, water vole and otters which are all protected but were not recorded on the development site.

Invertebrate

The site was recorded as being low quality for invertebrates.

Conclusions on Quality of the Site

It is common for sites that do contain no or limited amounts of protected species to be considered of low quality. However, all natural habitat plays an important role in ecological conservation. This site is therefore considered to be a high quality natural habitat although only a small part of a much wider network. It is not part of the SSSI as it is of less value and quality, but it is a Metropolitan SINC.

Habitats Directive

The ecological report has found that the development could have an impact on European protected species. The site has been identified as being important to great crested newts and to a lesser

extent bats.

The ecological report has found that a European Protected Species (EPS) licence is likely to be required in respect to the great crested newts, who may be present on site in small numbers at limited times of the year.

Recent case law (Wooley vs Cheshire June 2009) has required a change to the way Local Planning Authorities consider European protected species. This judicial review case addresses how local planning authorities (LPAs) discharge their statutory duty under Regulation 3(4) of the Conservation Regulations (1994) to have regard to the requirements of the Habitats Directive in the exercise of their functions. In particular this refers to Article 16(c) of the Habitats Directive which states:

Provided that there is no satisfactory alternative and the derogation is not detrimental to the maintenance of the populations of the species concerned at a favourable conservation status in their natural range, Member States may derogate from the provisions of Articles 12, 13, 14 and 15 (a) and (b)[i.e. that protection of habitats and/or species]:

(c) in the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment;

The case focuses on how LPAs should approach the discharge of this duty in coming to planning decisions and in particular the need to properly consider the three tests set out in the Conservation Regulations (regulation 44[3]) which states:

(3) The appropriate authority shall not grant a licence under this regulation unless they are satisfied-

(a) that there is no satisfactory alternative, and

(b) that the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.

These have been refined for practical use as set out in the questions below.

1. That there should be no satisfactory alternative to the plan or project as a whole or in the way it is implemented

The car park will serve the Lido and is considered necessary to be situated on the Lido site. There are no alternatives outside the SSSI or on land that has less ecological value. The car park has been identified as necessary to reduce existing problems and to meet a growing demand. A do nothing option would see existing car parking problems continue and worsen. The Lido serves an important recreational, community and ecological function and must be retained, promoted and enhanced from a social and ecological perspective.

2. That the plan or project must be in the interests of preserving public health or public safety, or for other imperative reasons of overriding public interest (IROPI), including those of a social or economic nature and beneficial consequences of importance for the environment .

The Council considers that the car park is vital in retaining the Lido as attractive recreational and ecological resource. There are considerable problems with the existing parking conditions which impede on the safety and amenity of existing residents. There is also an increasing demand for the Lido s recreational offerings which are promoted by the Council as part of a fit and healthy borough. The long term benefits of the development need to be considered in relation to the relatively small scale reduction in an area that provides limited value for European protected

species. There is an overriding public interest on a health, safety and social perspective.

3. That the favourable conservation status of the species affected must be maintained

The site has a limited value in terms of European protected species. The value is reduced by the presence of a much greater network of habitats and sites. Further mitigation as presented in the next section will ensure that the development is likely to support the favourable conservation of the species through enhancement opportunities.

Conclusion

The Council recognises that the development will have an impact on a site that plays a role in supporting European protected species. However, it also recognises that the development is a necessity to manage existing parking problems that are having safety and amenity issues to residents near the Lido. In addition, the Council continues to promote Lido as a highly valuable community, recreational and environmental resource. It is unfortunate that there are no other suitable sites available, accordingly the Council considers that the development is needed in the overriding public interest .

It is noted though that the role the site plays for European Protected species is relatively limited in relation to the surrounding area. The site also offers importance to UK protected species and as a whole as natural area. However, the resource surrounding the site means that nature conservation will not be affected due to the development, and with regards to the mitigation measures proposed.

Mitigation and Planning Conditions

In respect to the above, I have no objections to the proposed development. The mitigation strategy proposed will ensure the ongoing conservation of protected species. However, the mitigation strategy could go a bit further to enhance the habitat offering for protected species, particularly regarding the ponds which were identified as in decline.

Condition

Prior to the commencement of development a scheme for the mitigation and enhancement of protected species and habitats must be submitted to and approved in writing by the Local Planning Authority. The scheme shall include the recommendations in the Ecological Mitigation Strategy (June 2012) and include details of ecological supervision for the works to be carried out in accordance with drawing G3274.001. In addition to the recommendations, the scheme shall clearly demonstrate proposals to improve Ponds 1 and 2 identified in the Amphibian survey. The development must proceed in accordance with the approved plan.

Reason

To protect and enhance wildlife in accordance with the NPPF and Policy 7.19 of the London Plan.

The development cannot proceed until a suitable great crested newt licence has been discussed and agreed with Natural England.

ACCESS OFFICER

As the existing parking arrangements are particularly challenging for groups arriving by accessible minibus and for individual disabled people with high sided vehicles, the proposal to increase the amount of available parking and improve pedestrian access to and within the Ruislip Lido is supported.

In determining this application, it is important that the Council considers the following observations

and recommendations:

1. The new car park would feature a 2 metre height restriction. Whilst the rationale for introducing a barrier is understood, the Lido is a popular resort, which in addition to local residents, is also frequented by groups and individuals from neighbouring boroughs and beyond. The current parking facilities and procedures, potentially leave some disabled people with nowhere to park unless they provide 24 hours notice for the vehicle height barrier to be unlocked.

2. The proposed plans indicate a new pathway leading from the new site entrance to a new pedestrian crossing point. A new path would also be formed from the accessible parking bays to the same crossing leading to Willow Lawn. The footpath would be raised, thereby providing clear delineation and separation for pedestrians and vehicles, and adequate dropped kerbs are proposed to provide access from the road level onto the pavement. Tactile paving will be introduced at key crossing points to assist blind and visually impaired persons, and a one metre high fence is proposed on the outer edge of Willow Lawn adjacent to the new road to protect everyone from moving vehicles. These provisions are considered to be acceptable from an accessibility point of view.

3. Ten standard sized accessible parking bays are proposed within the new car park. The plan indicates that these bays would be located close to the car park entrance (on the north side) and positioned perpendicular to the road. The location of the parking bays, as proposed, would result in wheelchair users with rear access vehicles exiting onto the road, which may disrupt the flow of incoming vehicles during peak times, and may cause anxiety to some disabled people who are unable to move quickly and who may be, or feel, pressurised into hurrying.

Recommendations:

a. Whilst beyond the scope of this planning application, it is recommended that a minimum of one on-street parking bay should be provided on Reservoir Road in close proximity to the Lido entrance to allow vehicles displaying a Blue Badge to board and alight passengers. In addition, such provision could also serve as a waiting area for privately owned high-top and high sided accessible vehicles to wait/park until a park ranger is available to facilitate access into a car park. To accommodate large Community Transport and Dial-a-Ride sized vehicles, the space should be no less than 7 m long by 2.6 m wide (BS 8300:2009 suggests a minimum 6 m x 3).

b. The proposed taxi bay(s) should be substituted by accessible on street parking for Blue Badge holders, if no other area can be identified for minibuses. The accessible bay(s) should have a time limit attached* to ensure the provision is used only for the purposes waiting (*subject to provisions the Traffic Sign Regulations and General Directions 2002 (and subsequent changes).

c. Within the remit of this planning application, 50% of the accessible parking bays should be relocated away from the vehicle entrance of the car park, and suitably isolated from the main flow of traffic. One option might be to close the opening proposed between the motorcycle bay and bank of centrally positioned nose to tail parking spaces, and reintroduce the road opening approximately 34 metres north eastwards. A car parking layout along these lines would allow the accessible parking bays to be located on the south side of the car park, allowing easier access onto the existing road closest to Willow Lawn and other popular facilities.

Conclusion: Acceptable, subject to consideration of the above recommendations.

Officer comment: These issues have been addressed.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

UDP policy OL1 defines the types of development considered acceptable within the Green Belt. These are predominantly open land uses including agriculture, horticulture, forestry, nature conservation, open air recreational activities and cemeteries. It states that planning permission will not be granted for new buildings or changes of use of existing land or buildings which do not fall within these uses.

Policy OL2 states that, where development proposals are acceptable within the Green Belt, in accordance with Policy OL1, the Local Planning Authority will seek comprehensive landscaping improvements to enhance the visual amenity of the Green Belt.

London Plan policy 7.16 reaffirms that the "strongest protection" should be given to London's Green Belt, in accordance with national guidance, and emphasises that inappropriate development should be refused, except in very special circumstances.

The NPPF reiterates that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. It states that:

"When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

In view of the above policies very special circumstances will need to be demonstrated in order to justify the change of use of the land for use as a car park, to the extent that the harm to the openness of the Green Belt has been outweighed.

In this instance, it is acknowledged that the car park is essential to and associated with the use of Ruislip Lido for open air recreation. The existing car park facility is not of sufficient size to accommodate the large number of visitors to the Lido during peak times and this results in a high level of on-street parking in the surrounding area, which adds to congestion, is visually undesirable, and reduces highway and pedestrian safety. The provision of a sensitively located and carefully designed new car park will help to alleviate this existing problem whilst aiding and encouraging the continued use of Ruislip Lido for outdoor recreational activities.

On balance, it is considered that the need for additional car parking facilities to serve the Lido, which will in turn decrease on-street parking demand and associated congestion and encourage the continued use of the Lido for outdoor recreation, amounts to a case of very special circumstances so as to justify an exception to Green Belt Policy. Furthermore, given that mitigation measures will be put in place to reduce its visual impact, it is not considered that the proposal will have such an adverse impact on the openness of the Green Belt so as to justify refusal.

7.02 Density of the proposed development

Not applicable to this development.

7.03 Impact on archaeology/CAs/LBs or Areas of Special Character

There are no Conservation Areas, Areas of Special Local Character or Listed Buildings within the vicinity of the site.

In terms of archaeology, English Heritage have confirmed that the proposals are not considered to have an affect on any significant archaeological remains and, accordingly, no objections have been raised in this respect.

7.04 Airport safeguarding

Not applicable to this development.

7.05 Impact on the green belt

Saved Policy OL2 seeks landscape improvements within the Green Belt. Saved Policy OL5 will only permit proposals for development adjacent to or conspicuous from the Green Belt if it would not harm the character and appearance of the Green Belt. Saved policy OL26 seeks the protection and enhancement of trees, woodland and landscape features.

The site's zone of visual influence will remain relatively high, as Ruislip Lido is a popular and well used facility. However, the proposed car park has been sited so as to minimise the impact it will have in terms of ecology, flooding, etc. Furthermore, in mitigation, it is proposed to provide extensive planting along the boundaries and within the car park, which together with the existing trees to be retained along the eastern boundary, will provide an element of screening, which will become more effective as the planting matures.

Overall, it is considered that the visual impacts of the proposal are unlikely to be of significant detriment to the character of the area, or the perception of openness of the Green Belt, due to the existing landscape character and use and the proposed planting strategy. It is therefore not considered that the amenity and openness of the Green Belt would be harmed to a detrimental degree by the proposals, in accordance with Saved Policies pt 1.29 and OL1, OL2, OL5 and OL26 of the UDP.

7.06 Environmental Impact

With regard to ground contamination, a Phase 1 and 2 geotechnical and geo-environmental investigation was commissioned in order to identify the potential for hazardous substances or conditions to exist on, at or near the site. The results were contained in the Site Investigation Report which was submitted in support of the application. No ground contamination was encountered during the investigation and the report concludes that there are no outstanding environmental or geotechnical issues that would require any additional work in respect of the proposed end use.

Other environmental issues have been addressed within parts 7.05 (Green Belt), 7.14 (Trees, Landscaping & Ecology), 7.17 (Flood Risk) and 7.18 (Noise/Air Quality) of the report.

7.07 Impact on the character & appearance of the area

This issue has been covered in Section 7.05 of this report.

7.08 Impact on neighbours

The proposed overflow car park would be over 200 metres away from the nearest residential property. It is not therefore considered that the proposal would result in an over dominant form of development which would detract from the amenities of neighbouring occupiers, in compliance with Policy BE21 of the UDP saved policies September 2007.

Similarly, it is not considered that there would be a material loss of privacy, daylight or sunlight to neighbouring properties, as the proposed building would be sited a sufficient distance away from adjoining properties. The proposal is therefore considered to be consistent with the aims of Policies BE20 and BE24 of the UDP Saved Policies September 2007 and relevant design guidance.

7.09 Living conditions for future occupiers

Not applicable to this development.

7.10 Traffic impact, car/cycle parking, pedestrian safety

Saved Policies AM2 and AM7, of the UDP are concerned with traffic generation and road capacity. Saved Policies AM9, AM14 and AM15 of the UDP relate to the provision of adequate car parking and secure cycle storage. There are no specific car parking standards for such leisure facilities as Ruislip Lido. Instead it is identified that parking provision should be determined on an individual basis. Similarly there is no Hillingdon cycle parking standard for this type of leisure facility as the requirements at each site can be very different.

In terms of current car parking provision, there is an existing free-to-use 260 space permanent car park located off Reservoir Road, close to the bus turning circle area at the end of Reservoir Road. This car park has spaces marked for blue badge holders and spaces for brown badge holders and marked parking for between ten and fifteen motorcycles. There was historically also some informal parking use of the area that is now proposed to become a permanent car parking area. In addition an arrangement also exists for the use of the car parking at Breakspear Crematorium (in excess of 100 spaces) during busy periods. Roadside parking takes place along Reservoir Road, Ducks Hill Road and potentially other areas in the vicinity on peak occasions.

Public transport access to the site is through the H13 bus service which stops on Reservoir Road in the vicinity of the Waters Edge pub/restaurant. This service runs generally on a 20 minute frequency with a route between Ruislip Lido and Northwood Hills. In addition the 331 bus service passes by the site along Ducks Hill Road. This service connects Ruislip with Uxbridge. The H13 bus service currently experiences difficulties due to inappropriately parked vehicles on Reservoir Road.

Parking Demand

The existing parking demands at Ruislip Lido are variable depending upon the time of year, day of week and the weather conditions. At busy periods, parking demand is considerably in excess of that available within the existing car parking provision. During these periods the following parking conditions can occur:

- Road side parking along Reservoir Road, including parking in inappropriate locations, such as in the vicinity of the bus turning area or bus stop. It is understood that at certain times this has resulted in buses becoming blocked by parked cars and having to wait for those parked vehicles to be towed away. As a consequence of these problems from parked cars the bus operator has several times refused to operate the bus service along Reservoir Road

- Temporary parking use of the area that is now proposed to become a permanent car parking area.

Access to this area is controlled by staff at the Lido area.

- Direction of traffic to use the car parking at Breakspear Crematorium (in excess of 100 spaces).

- Roadside parking along Ducks Hill Road and possibly other roads in the local area.

In order to address these peak parking demands, it is proposed to construct the new hard-surfaced car parking area. The proposals will provide a total of 150 parking spaces of which 10 will be marked for disabled person use and 7 signed for brown badge holders. In addition there will be an identified area for motorcycle parking and cycle parking provision of 4 spaces through the provision of Sheffield style hoop stands (two cycles/stand). The car parking area will be accessed from the access road from Reservoir Road, which will be improved.

Traffic generation

It should be noted that the periods of high parking demand at the site occur outside of the peak AM and PM weekday traffic periods for the local highway network. Therefore, it is not considered that the proposed parking provision will have a detrimental impact upon the adjacent highway network during these peak weekday traffic periods.

Highway Safety

The introduction of vehicular traffic to what is essentially a car free pedestrian zone could potentially raise a number of issues in terms of highway and pedestrian safety. These include a potential conflict between the cars and pedestrians, including children, wheel chair users and cyclists. In particular, the junction between the access road and the entrance to the miniature railway was initially a cause for concern. In order to address these issues, the scheme now includes the provision of a foot way along the length of the access road as well as a pedestrian crossing facility in the vicinity of the miniature railway station and marking of the existing pedestrian crossing between the existing car park and the Lido area.

The width of the access road varies along its length, but is generally around 5.4 metres. The minimum width shown for the access road is approximately 3 metres where the road is narrowed to a single lane in order to provide a raised pedestrian crossing area. At this location a signed single-lane priority system for traffic will operate, with traffic exiting the car park area having priority. The Highway Engineer considers that the width of the access is largely acceptable to allow two-way traffic. However where the pinch point is proposed to the carriageway, considering the likely high volumes of pedestrians and vehicles during peak times, the Highway Engineer does not consider that such an arrangement would be suitable. The Highway Engineer therefore recommends that the scheme should be amended to extend the two-way carriageway width in the vicinity of the proposed raised pedestrian crossing area, extending the foot way alongside the carriageway, with the speed table with tactile paving on either side. These amendments could be secured by means of suitable condition.

Fencing and bollards are to be provided alongside the access road in order to prevent inappropriate vehicle use of the adjacent grassed areas and to physically separate pedestrian areas and vehicular traffic. In order to aid safety, it is proposed to ensure slow vehicle speeds by providing two speed tables, one of which is to be used to provide a raised pedestrian crossing in the vicinity of the miniature railway station. Details of these works are secured by condition.

It is proposed that the new surfaced car park area will be used on an as required basis and will be free to use. Access to the new car park will be controlled, as now, by the use of a physical barrier. Staff will be responsible for deciding when the proposed parking spaces will be required and will then enable use of this car parking area. A single bar vehicle gate will prevent cars from accessing the other land/open space areas beyond the new car park.

Cycle Parking

In terms of cycle parking, it is proposed to provide 4 cycle parking spaces in the vicinity of the miniature railway station building. Generally it has been noted that cyclist users of Ruislip Lido keep their bicycle with them rather than park them. Given the distance of the proposed new car park to most visitor destinations within Ruislip Lido it is unlikely that

many visitors would choose to park their bicycle at this location and then walk to their destination. However, there is some potential for those using the miniature railway to wish to park their bike while they take the train ride. Therefore, the provision of cycle parking stands at this location could be of benefit to such cyclists. In addition, Hillingdon Borough Council will, as part of their management of this area, review periodically the need for further cycle parking facilities at other locations within Ruislip Lido.

Construction Management

A Construction Management Plan will be put in place for these works. This will ensure that any negative impacts from the construction process are minimised. This is secured by condition.

Conclusion

Subject to the above issues being covered through suitable planning conditions, no objection is raised on the highways aspect of the proposals, which are considered to be in compliance with Saved Policies AM2 and AM7, AM9, AM14 and AM15 of the UDP.

7.11 Urban design, access and security

These issues have been addressed in other sections of this report.

7.12 Disabled access

The Council's Access Officer notes that the existing parking arrangements are particularly challenging for groups arriving by accessible minibus and for individual disabled people with high sided vehicles and supports the increased amount of available parking and improvement of pedestrian access to and within the Ruislip Lido. 10 parking spaces for disabled person use and 7 signed for brown badge holders, out of the total new parking provision of 150 spaces are considered acceptable.

The proposed plans indicate a new pathway leading from the new site entrance to a new pedestrian crossing point. A new path would also be formed from the accessible parking bays to the same crossing leading to Willow Lawn. The footpath would be raised, thereby providing clear delineation and separation for pedestrians and vehicles, and adequate dropped kerbs are proposed to provide access from the road level onto the pavement. Tactile paving will be introduced at key crossing points to assist blind and visually impaired persons, and a one metre high fence is proposed on the outer edge of Willow Lawn adjacent to the new road, to protect everyone from moving vehicles. These provisions are considered to be acceptable from an accessibility point of view by the Council's Access Officer.

The Access officer however raises a number of issues for consideration and recommendations which are addressed below:

Firstly, the new car park would feature a 2 metre height restriction, which would restrict high sided vehicles from accessing the new car park, potentially leaving some disabled people with nowhere to park unless they provide 24 hours notice for the vehicle height barrier to be unlocked. However, it is noted that this overflow car park will only be operational during peak periods in the summer and high sided vehicles will continue to utilise existing arrangements for the majority of the time.

Ten standard sized accessible parking bays are proposed within the new car park. The original plan indicated that these bays would be located close to the car park entrance, which would result in wheelchair users with rear access vehicles exiting onto the road,

potentially disrupting the flow of incoming vehicles during peak times. Amended plans have therefore been submitted relocating 50% of the accessible parking bays away from the vehicle entrance of the car park, and suitably isolated from the main flow of traffic.

The applicant has offered to convert the existing taxi bay(s), located at the entrance to the Lido to an accessible on street parking/waiting bay for Blue Badge holders. Such provision could also serve as a waiting area for privately owned high-top and high sided accessible vehicles to wait/park until a park ranger is available to facilitate access into the proposed car park. The Access Officer has suggested that this should have a time limit attached, to ensure the provision is used only for the purposes waiting. This has been secured by condition. Subject to conditions to ensure the provision of facilities designed for people with disabilities are provided prior to commencement of use, the scheme is considered to comply with Saved Policies R16 and AM13 of the UDP.

7.13 Provision of affordable & special needs housing

Not applicable to this development.

7.14 Trees, Landscaping and Ecology

TREES AND LANDSCAPING ISSUES

Saved Policy OL2 seeks landscape improvements within the Green Belt. Saved Policy OL26 seeks the protection and enhancement of trees, woodland and landscape features. Saved policy BE38 seeks the retention of topographical and landscape features and the provision of new planting and landscaping associated with development proposals.

The site for the proposed overflow car park is currently divided into two halves of rough grass to the east and semi-natural woodland to the west. The woodland consists mostly of aspen with smaller numbers of birch, hawthorn, goat willow and a small number of oaks with an absence of ground flora. To the north of the site there is more immature semi-natural woodland, which includes more Oaks. To the west of the site and the railway, on the eastern edge of Poor's Field there is a line of very large, mature Oaks, which are considered to be of landscape of merit. Historic maps show that in the mid-1860s, the land forming this site was on the eastern side of Poor's Field and was open. The only trees near to the site appear to be the line of Oaks. Later maps seem to show the site was part of Poor's Field, with scrub and a small clump of trees.

The proposed car park will cover most of this area with the exception of a small band of herbaceous growth adjacent to the railway fence line and the area to the north containing the best of the oaks. The immature, mostly Oak, woodland to the north of, and continuous with the immature Aspen/Birch woodland and scrub on part of the site, has some landscape/amenity value, and is retained.

The immature woodland on the site, is a fairly recent addition to the landscape of the Lido near to Poor's Field, and is considered to be of low landscape/amenity value. The scheme retains several of the trees, but most of the immature woodland and scrub is removed to facilitate the proposed development.

The proposal includes a landscaping scheme with many new trees in and lining the proposed car park. All new planting will be native and consist of climax species of oak and ash, with sub-level of birch, field maple, rowan and alder. Under storey and edge planting will be included, consisting of hazel, dogwood, hawthorn, blackthorn, guelder rose and holly. New individual tree planting will be carried out along the boundary with the railway consisting of oak, ash, birch and field maple, these trees will be 3-4 metres in height at time of planting, and the woodland mix will be typically transplants and whips of

60-90 cms high. It is proposed to plant a line of field maples through the centre of the car park together with ground cover planting to break up the overall macadam area. Hedge planting of native material will be carried out along the east boundary to further screen the car park from the main Lido area.

The proposed tree planting will reinforce the existing linear clump of trees on the other (western) side of the drive. In the short-term at least, whilst the new trees and hedges will provide a buffer and low level screen, the line of mature Oaks on the fringe of Poor's Field will be more visible and conspicuous in a more open landscape.

The Tree and Landscape Officer notes that the revised landscape proposals include some Oaks and given the outbreak of Oak Processionary Moth in West London, it is advisable to remove Oak from this scheme, in order to avoid the risk of an outbreak in Hillingdon and near to Ruislip Woods. This can be dealt with by way of a suitably worded condition and informative.

Overall and in the context of the Lido and the history of the local landscape since the reservoir/lido was developed, the Tree and landscape Officer considers that whilst the car park will be noticeable, the scheme will not have a harmful landscape impact.

Subject to the suggested revision to the landscaping (tree planting) proposals and conditions, the revised application is considered acceptable in terms of Saved Policy BE38 and relevant Green Belt (landscape) policy.

ECOLOGY

Saved policy EC2 of the UDP seeks the promotion of nature conservation interests. Saved Policy EC3 requires proposals for development in the vicinity of sites of nature conservation importance to have regard to the potential effects on such sites on changes in the water table and of air, water, soil and other effects, which may arise from the development. Regarding the creation of new habitats, Policy EC5 of the plan seeks the retention of certain on-site ecological features enhancement of the nature conservation and ecological interest of sites or create new habitats.

The application site is adjacent to the Ruislip Woods Site of Special Scientific Interest (SSSi)SSSI / National Nature Reserve NNR. The development site is also situated in an area designated as a Metropolitan Site of Importance for Nature Conservation (SINC). Natural England and other non statutory organisations have been consulted. Natural England considers that this application is unlikely to have significant implications for the SSSI / NNR. Consequently, it has no comments to make in respect of these designated sites.

Species Issues

During 2010, a Desk Top Study and a Phase 1 Habitat survey results of which were contained an Ecological Site Appraisal, were undertaken. During these surveys, the presence of reptiles in the local area was identified and habitat within the site was identified as being suitable to support reptiles. The Appraisal recognises that the site comprises habitats that provide, in addition to reptiles, potential foraging for bats, breeding birds, and use by reptiles, including adder and grass snake. The appraisal recommended surveys to determine the presence / absence of reptiles within the site.

During late August and early September 2010 a reptile presence / absence survey was

undertaken. The survey identified the presence of a low population of slow worm within the proposed development site. In 2012, an a Reptile Mitigation Method Statement was prepared in support of the application.(Report Ref: 3274.001 Version 1.0) dated March 2012. Following recommendations from Natural England, repeat reptile surveys were completed, in addition to amphibian surveys. Bat surveys were also completed at the Ticket Office for the Miniature Railway and an ivy clad tree that are to be removed as part of other phases of the Ruislip Lido Refurbishment Project. The results of these surveys were contained in a revised Ecological Mitigation Strategy (Report Ref: 3274.002 Version 1.0) dated June 2012. This report provides a robust ecological survey and impact assessment, following good practice guidelines, as recommended by Natural England.

The Ecological Mitigation Strategy, including a Mitigation Method Statement submitted as part of this application is intended to to minimise impacts on reptiles and offset loss of reptile habitat as a result of the proposals.

The base line conditions of various protected species, and the proposed mitigation contained in the Ecological Mitigation Strategy are summarised below:

Birds

The scrub and regenerating wooded area offers opportunities for nesting birds. The nesting season is generally accepted to occur from March to August inclusive. Wild birds are protected under the Wildlife and Countryside Act 1981 as amended while at the nest; this is generally accepted to include the period from nest construction to completion of fledging young.

Reptiles

The 2010 reptile survey identified a low population of slow worm within the site. During the more recent survey in spring 2012, low populations of slow-worm and grass snake were confirmed from within the footprint of the car park. Slow-worm and grass snake are protected under the Wildlife and Countryside Act 1981 as amended against killing and injury. The Ecological Site Appraisal concluded that the site provides limited habitat for use by reptiles, providing mainly basking opportunities, although the grassland areas are disturbed by dog walkers and other members of the public. The woodland habitats provide some hibernation opportunities with some earth mounds, brash piles and root balls providing some potential to support sheltering or hibernating reptiles. However the survey identified a low level of use by reptiles and the site is not judged to be an important reptile site.

Amphibians

The survey in spring 2012 confirmed small populations of great crested newts, smooth newts and common toad within Pond 2, located within M of the site. Great crested newts and their habitats (aquatic and terrestrial) are fully protected under the Conservation of Habitats and Species Regulations 2012 and the Wildlife and Countryside Act 1981 as amended.

Paragraph 98 of ODPM Circular 06/2005 states that 'The presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat'. Paragraph 99 also states that 'It is essential that the presence or otherwise of protected species and the

extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision'

The Ecological Mitigation Strategy considers that the populations of Great Crested Newts are of local importance and the site represents intermediate habitats which will be suitable for foraging and refuge, although densities are likely to be low, given the distance between the pond and the site and the abundance of high quality habitats surrounding the pond.

Bats

The proposal is to retain all existing mature trees with clearance limited to ground foliage, saplings and general scrub areas. The ecology report found that the development will have a negligible impact on bats and will not result in the loss of trees with potential bat roosts. The area around the car park site is considered to be of optimum quality for bats. Therefore the loss of a small scale foraging areas is considered not to have detrimental impact on bats. Proposals for the new car park will not result in the loss of potential roosting habitats, nor will they significantly affect foraging or commuting activity. Although tree and scrub cover will be reduced in the car park site, a continuous linear tree canopy will be maintained. No mitigation measures are therefore proposed in respect of bats.

Mammals

The site was appraised for Badger, water vole and otters which are all protected but were not recorded on the development site.

Invertebrate

The site was recorded as being low quality for invertebrates.

Proposed Mitigation.

Habitat creation: The development will result in some loss of rough grassland and woodland habitat. These habitats are not inherently ecological valuable, so their loss is not considered to be of significance. However, these habitats support protected species (reptiles and, potentially, nesting birds and great crested newts). The loss of the habitats could therefore result in significant effects upon these species. However, due to the nature of the new development, habitat mitigation cannot be undertaken within the development area. It is proposed that habitat improvement will be undertaken within the block of woodland that extends out of the site to the northeast.

Within the woodland edge northeast of the proposed development, a hibernacula will be created, using wood chip, brash and wood arising from tree and scrub clearance. A trench will be dug 1m in width and 5m in length and to a depth of 500mm. The trench will be loosely filled with brash, logs and wood chips. Brash, logs and wood chips will then be loosely piled to a height of 500mm to form a bank. Spoil obtained from digging the trench will be used to cover the hibernacula, ensuring that there are gaps at ground level that will allow reptiles to access the hibernacula. The design is will be supervised by an ecologist.

Scrub and young trees will be controlled annually along a 3m strip following the southeast boundary with the footpath and the south boundary with the car park, to create a strip of rough grass and woodland edge habitats suitable for use by reptiles. Details of off site mitigation are secured by condition.

The amphibian survey identified two ponds with the potential to support great crested newts. These the ponds are identified as in decline and it is recommended that a scheme to improve Ponds 1 and 2 should be included in the mitigation strategy.

Exclusion and translocation: The hibernacula will be created following the tree and scrub clearance of the site, and prior to the start of reptile exclusion and translocation. Slow worm, and any other reptiles present, will be excluded from the site through a mix of habitat degradation and translocation. Trees and scrub removal works should be undertaken outside of the bird nesting season (March- August inclusive). Where this cannot be achieved, inspection by an ecologist immediately prior to felling should be undertaken. Any active nest identified must be left undisturbed until the chicks have left the nest. Following scrub and vegetation removal, vertical reptile exclusion fencing will be installed around the perimeter of the site. Fencing installation will be supervised by an ecologist. Reptiles will be captured by hand and transferred to a cotton sack before being released within adjacent woodland edge habitat of the area just north of the site. If no reptiles have been captured within the final 5 days of tinning, the translocation scheme can be ended. Where reptiles are captured within the final 5 days of trapping, including extensions, the translocation period will be extended by 5 days since the date of the final capture.

A condition is therefore recommended for the mitigation and enhancement of protected species and habitats based upon the recommendations in the Ecological Mitigation Strategy (June 2012) summarised above and also include details of ecological supervision for the works.

Habitats Directive

As stated above, the ecological report has found that the development could have an impact on European protected species. The site has been identified as being important to great crested newts and to a lesser extent bats. The ecological report has found that a European Protected Species (EPS) licence is likely to be required in respect to the great crested newts, who may be present on site in small numbers at limited times of the year.

Local Planning Authorities (LPA's) in discharging their statutory duty under Regulation 3(4) of the Conservation Regulations (1994) must have regard to the requirements of the Habitats Directive in the exercise of their functions. LPAs should approach the discharge of this duty in coming to planning decisions and in particular the need to properly consider the three tests set out in the Conservation Regulations (regulation 44[3]) These tests are set out below:

1. There should be no satisfactory alternative

The car park will serve the Lido and is considered necessary to be situated on the Lido site. There are no alternatives outside the SSSI or on land that has less ecological value. The car park has been identified as necessary to reduce existing problems and to meet a growing demand. A do nothing option would see existing car parking problems continue and worsen. The Lido serves an important recreational, community and ecological function and must be retained, promoted and enhanced from a social and ecological perspective.

2. That the plan or project must be in the interests of preserving public health or public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of importance for the

environment.

The Council considers that the car park is vital in retaining the Lido as attractive recreational and ecological resource. There are considerable problems with the existing parking conditions which impede on the safety and amenity of existing residents. There is also an increasing demand for the Lido's recreational offerings which are promoted by the Council as part of a fit and healthy borough. The long term benefits of the development need to be considered in relation to the relatively small scale reduction in an area that provides limited value for European protected species. There is an overriding public interest on a health, safety and social perspective.

3. That the favourable conservation status of the species affected must be maintained

The site has a limited value in terms of European protected species. The value is reduced by the presence of a much greater network of habitats and sites. Further mitigation will ensure that the development is likely to support the favourable conservation of the species through enhancement opportunities.

Conclusion

With the incorporation of mitigation measures outlined above, it is not considered that there would be significant impact on nature conservation in the long-term. None of the statutory or non-statutory designated sites within a 2 km radius of the site boundary will be directly affected by the development proposal. Subject to no objections being received from Natural England and any conditions that body may wish to impose and subject to the conditions referred to above, it is considered that the scheme will safeguard the existing nature conservation interests on the site, while providing opportunities for promotion and enhancement, in compliance with Policies EC2, EC3 and EC5 of The Hillingdon Unitary Development Plan Saved Policies (September 2007).

7.15 Sustainable waste management

Not applicable to this development.

7.16 Renewable energy / Sustainability

Not applicable to this development.

7.17 Flooding or Drainage Issues

FLOODING

Saved Policies OE7 and OE8 of the UDP seek to ensure that new development incorporates appropriate measures to mitigate against any potential risk of flooding. London Plan (2011) maintains a strong focus on sustainable drainage. The National Planning Policy Framework (NPPF) and accompanying Technical Guidance 2012 continues to focus on sustainable flood risk management, the sequential approach and sustainable drainage systems.

A Flood Risk Assessment (FRA) has been submitted as part of the application taking into consideration the principles of Planning Policy Statement 25 (PPS25)(now superseded by the NPPF) and other relevant regional and local policies. The FRA is not solely related to the car park proposals subject to this application. It is linked to the proposed car park development, as it provides a more accurate understanding of the flood risk in the area. In addition, the FRA provides an updated and detailed assessment, to better inform the operation of the Lido water levels. The FRA allows a decision to be taken on the most suitable water level that does not increase flood risk, but enables optimum environmental and recreational conditions to be set.

Ruislip Lido has historically acted as a large scale flood attenuation structure and the water levels were maintained at certain levels, to allow for flood storage in times of heavy rain. The FRA and the FRA Addendum considers the impacts downstream, particularly where flood risk has been mapped by the Environment Agency. It was alleged that in 1977 and 1988, water discharged from the Lido was partly responsible for flooding downstream along the Cannon Brook, the receiving watercourse for outflows from Ruislip Lido. However, it is noted that there was generally no specific engineering evidence or flood modelling to provide an accurate understanding of the role of the Lido in flooding during these flooding episodes. It is understood that the practices at the time meant that the water was not drawn down prior to heavy rains. As a consequence, the capacity in the Lido was constrained and a discharge was made into Cannon Brook at a time when it was already near or at capacity.

In addition, Cannon Brook was also likely to be heavily influenced by the confluence of the Mad Bess Brook. The two brooks merge in the area of Ladygate Lane. The discharge from the Lido and the flows from Mad Bess Brook were likely to put too much pressure on the limited channel, particularly at the road culvert, on the Cannon Brook. This was the likely cause of the flooding.

In response to the above mentioned flooding incidents, a precautionary approach was adopted and the operating water level in the Lido was lowered by up to 1 metre below the original design datum level, to allow a considerable amount of capacity to store additional water should it need to. It is also noted that the water level at Ruislip Lido is now carefully monitored and managed, in view of those past flooding problems to residential properties downstream on the Cannon Brook.

However, the operating level between 1992 and 2008 which was 1 metre below original design datum was not deemed to be an optimum level for recreational or environmental conditions and in 2008, a change to the operational level was made, to allow water levels to be maintained at 0.65m below the initial Lido discharge point (a small spillway that discharges into the Cannon Brook). This level is to be maintained and it is not intended to change the operating level of the Lido as part of this application.

Sequential Approach

The National Planning Policy Framework (including Technical Guidance) and the Environment Agency require a sequential approach to development and flood risk. Local Authorities must be able to demonstrate that where new development is proposed in higher risk flood zones (2 and 3), that there are no suitably available alternatives elsewhere. The development is considered to have a less vulnerable use in terms of flood risk. However, there is a direct risk to people's property, as well as a residual risk of people re-entering flooded car parks to retrieve vehicles. If there is an alternative site without a high probability of flooding then this should be considered first.

The Environment Agency's flood zone maps show the site not to be in an area of flood risk. However, the FRA has provided a more accurate representation of flooding on the Lido and shows that the development site and surrounding area could experience flooding in a 1:100 year (+ climate change) event. In accordance with the sequential test, the Council must be satisfied that there is no other appropriate location for the car parking.

The level of flooding in the car park area only becomes of significant depths of over 1 metre in the extreme 1:1000 year event (flood zone 2) although there will be some flooding, the majority below 0.5m in the 1:100 year event. It is noted that similar levels of

flood risk immediately surrounding the proposed site.

In terms of the need for the development, the proposed car park is required to provide a more formal and safe parking area for Lido visitors; additional car parking capacity when the existing provision has reached to a saturation point; address health and safety concerns of local residents with cars being parked in nearby major and side roads and avoid damage to curbs, trees, fences, walls etc, through cars being parked unsafely. As a result, the proposed car park must be placed in close proximity to the Lido.

It is acknowledged that there are areas around the Lido which are less at risk of flooding. However, these have further constraints. No development can take place within the Site of Special Scientific Interest (SSSI) which surrounds the Lido. Other areas are outside the ownership of the Council and the curtilage of the Lido, are therefore considered unavailable and therefore not suitable. Other areas outside the SSSI would required the removal of a significant amount of trees north of the existing car park and are likely to be an area with a high ecological value.

In conclusion, the development must be located near the Lido, but there are minimal sites at a lower risk of flooding. Potential alternatives in terms of flood risk are heavily constrained by ecological designations or are impractical for other reasons. The development site is considered to be the most suitable site given the low vulnerable nature of the proposals and the lack of suitable alternative sites.

Results of the FRA

For the purposes of the FRA, the modelling and mapping of strategic Flood Zones assumes the normal operating level at Ruislip Lido is held at 0.65m below datum. The current operating regime that holds the water level below the spillway at this level means flood storage is now available to prevent the Lido outflow contributing in the same way as in previous flood events. It is not intended to modify this operating level.

The FRA concludes that the current operating level set in 2008 (0.65m below the original design datum level) is the optimum level, without increasing flood risk downstream. There is no increase in flood risk downstream, whether water is stored at 1m below or 0.65m below the discharge point. The assessment of the impact of changes in operating level at Ruislip Lido shows that to hold the initial lake level at either 1m below the original datum or 0.65m below has no impact downstream at Ladygate Lane or at the confluence of Cannon Brook with the River Pinn, based on the current flood risk. This is because as the Ruislip Lido holds back flood flow, the flood risk on Cannon Brook results primarily from flows on Mad Bess Brook.

The FRA does however acknowledge that the Council considered options for a further increase of the water level to 0.5m below original datum, but advised against this, as there is a very slight increase in flood risk if water were to be stored at 0.5m below.

Although over the past year the lake level was allowed to exceed this normal operating level on occasion, there are no plans to repeat this. The historic flooding and subsequent modelling has shown that capacity for storage in the Lido must be maintained and no discharge should occur at times of peak flow in the Cannon Brook. As a consequence, the water level in the Lido must be maintained below the spillway, but an operating level of 0.65m below the axillary spillway would not increase flood risk and would optimise environmental and recreational conditions. The FRA concludes that there is no increased risk of flooding by maintaining the current operational levels of 0.65m below the auxiliary

spillway.

Flood Risk Management

Although the development is considered to be of a low vulnerable nature there is a residual risk of flooding that needs to be managed. With regard to this application, the revised Flood Zones indicate that the overflow car park partly falls within FZ3b (1:20-year). The acceptability of parking use is dependant on the depth and the ability to manage parking during potential flood events, and the modelling indicates this depth to be between 0 to 0.5m for the current FZ3 (1:100-year). Mitigation measures are therefore proposed including compensatory floodplain storage.

The car park site is within a flood risk area and its construction will involve increased hard standing within floodplain, in order to provide 1:40 cross fall for effective drainage and to limit the flood depth. To offset any adverse impact of lost floodplain, compensatory floodplain storage is required and is normally provided by re-contouring of land to create new floodplain (on a level-for-level basis). For this purpose, it was initially planned to utilise the available land at the north end of the lake. However, this is not feasible as a buried gas/water mains crosses it. An alternative form of compensatory storage is therefore proposed, which involves reducing slightly the lake outflow through the auxiliary overflow pipe to increase flood storage within the lake.

As stated above, the FRA demonstrates that the increase in hard standing and therefore runoff can be attenuated through further providing further capacity in the Lido. This can be done by fitting a simple collar to the auxiliary overflow spillway in the Lido, which would allow the water to rise by a small amount (approximately 1 cm), before being discharged into the Cannon Brook. This very small increase in water level spread out over the Lido would be more than sufficient to attenuate any increase in flows from the hard standing. The Environment Agency advised that this collar proposal as compensation is acceptable, provided that reducing the flow in the outlet pipe and holding water back in the Lido would not effect flooding elsewhere or cause an increase upstream. Modelling demonstrates that this is the case. Details of this attenuation are secured by condition.

The FRA also suggests that further flood risk management work is done on the problem areas on the Cannon Brook, in order to reduce the possibility that the road culverts could become blocked, although these are not related to the Lido levels. Thrash screens are proposed at key points along the Cannon Brook to prevent future blockages and details of these screens are secured by condition.

Flood Evacuation and Warning

The Environment Agency advise that consideration needs to given to the depth of the flood water and the ability of people to move their cars within the flood warning time. Car parks located in areas that flood must be designed to prevent vehicles floating out away. At 0.45m depth, vehicles can float but without danger of reaching the lake. This is because along the lake side of the car park the adjacent land is higher (flood depth <0.3m), which acts as a natural barrier. There is one stretch, near the entrance to the car park, where this is not the case and here an existing tree line with some additional tree planting completes the barrier. This planting of new trees or bollarding concealed by semi-mature shrubs will form part of the planting proposals for native planting.

The Environment Agency advised that their Flood Incident Management team aim for a target flood warning lead time of 2 hours, in the absence of actual lead times for Ruislip

Lido. Staff responsible for Ruislip Lido could act upon any flood warning, to clear the car park in advance of flooding. Even out of hours, there should always be an emergency contact.

A flood management plan will therefore be required. The plan should set out flood warning and evacuation procedures as well as the management of the car park once in flood. The management plan should be the responsibility of the car park operator. This is secured by condition.

Drainage

The Environment Agency expect the use of sustainable urban drainage (SUDS) hierarchy to be maximised, with any barriers to their use clearly detailed. In addition, the Environment Agency criteria is that surface water discharge from the developed site should mimic that of an undeveloped greenfield site, up to and including a 1 in 100 year critical duration storm event. A sustainable approach to the surface water drainage system has therefore been adopted. The design of the overflow car park incorporates two petrol/oil interceptors and sustainable drainage in the form of a swale along its northern edge, to manage surface water run-off. The swale is designed to accommodate a 1 in 100-year critical duration storm event. It is sized appropriately, with sufficient water storage and drainage properties to enable any surface water to drain away naturally into the ground and not directly into any piped main sewer system. There is also a small overflow pipe from the swale to the lake, where this need has been identified as a result of the FRA. There will be gullies around the car park that will direct water to the swale via small diameter pipes. The swale is open (no rock fill) and will be planted with native species, in line with advice from the Environment Agency.

In view of the SUDS proposed, it is not considered that the surface water drainage from the new car park will contribute any additional rainfall-runoff and avoids any adverse impact on flood risk.

In conclusion, the detailed information on flood risk included in the FRA confirms that the proposed overflow car park is acceptable in terms of flood risk and that the flood risk can be sustainably managed. The FRA has been approved by the Environment Agency and it is considered that the modelling carried out is as accurate as reasonably practicable, given the information available.

As stated above, the Environment Agency has raised no objections to the scheme, subject to the implementation and securing of the mitigation measures set out in the submitted FRA. These measures would include limiting the surface water run-off generated by the 1 in 100 year plus climate change critical storm, so that it will not exceed the run-off from the undeveloped site and not increase the risk of flooding off-site; provision of compensatory flood storage by reducing the lake outflow through the auxiliary overflow pipe, to increase flood storage within the lake; and the planting of trees or installing bollards to prevent vehicles floating out of the car park in a flood event. Conditions are therefore recommended to ensure these measures are implemented and requiring the development to be only be carried out in accordance with the approved Flood Risk Assessment (FRA). A flood management plan is also secured by condition.

Subject to these conditions, it is considered that the risk of flooding on site and down stream of the Lido will be minimised and that the statutory functions of the Environment Agency will not be compromised. The proposals are therefore considered to accord with Policies OE7 and OE8 of the Hillingdon Unitary Development Plan Saved Policies

(September 2007), and Policy 5.12 of the London Plan (July 2011).

7.18 Noise or Air Quality Issues

In terms of activity, traffic to the proposed development would utilise the existing redundant entrance and it is not considered that the proposed development would result in the occupiers of surrounding properties suffering any significant additional noise and disturbance, in compliance with Policy OE1 of the UDP Saved Policies September 2007.

There are no specific air quality issues associated with this application.

7.19 Comments on Public Consultations

Extensive public consultations were carried out for this proposal when this application was originally submitted in 2010, and further consultations were subsequently carried out in March 2012 and again in June 2012, following the submission of further information to support the proposal. Additional consultees were added, in response to representations from local residents. In total, over 550 local residents and amenity groups have been consulted on the revised proposals.

The application has generated a considerable amount of local interest, including 5 petitions objecting to the proposals. The main areas of concern relate to lack of justification for the proposed development, the loss of green environment, increased traffic congestion, highway and pedestrian safety, impact on ecology and increased flood risk. These issues have been dealt in detail within in the main body of the report.

Issues relating to inconsistencies/inaccuracies in the content of some of the documentation have been addressed in the revised submissions.

7.20 Planning Obligations

Not applicable to this development.

7.21 Expediency of enforcement action

Not applicable to this development.

7.22 Other Issues

There are no other issues relating to this application.

8. Observations of the Borough Solicitor

When making their decision, Members must have regard to all relevant planning legislation, regulations, guidance, circulars and Council policies. This will enable them to make an informed decision in respect of an application.

In addition Members should note that the Human Rights Act 1998 (HRA 1998) makes it unlawful for the Council to act incompatibly with Convention rights. Decisions by the Committee must take account of the HRA 1998. Therefore, Members need to be aware of the fact that the HRA 1998 makes the European Convention on Human Rights (the Convention) directly applicable to the actions of public bodies in England and Wales. The specific parts of the Convention relevant to planning matters are Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

Article 6 deals with procedural fairness. If normal committee procedures are followed, it is unlikely that this article will be breached.

Article 1 of the First Protocol and Article 8 are not absolute rights and infringements of these rights protected under these are allowed in certain defined circumstances, for

example where required by law. However any infringement must be proportionate, which means it must achieve a fair balance between the public interest and the private interest infringed and must not go beyond what is needed to achieve its objective.

Article 14 states that the rights under the Convention shall be secured without discrimination on grounds of 'sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status'.

10. CONCLUSION

The general principle of the development is considered acceptable, as the proposal is required in connection with the existing outdoor leisure use, an appropriate Green Belt use. It is considered that the proposal complies in general with the key theme contained within the NPPF, Saved UDP and London Plan Green Belt Policies, by keeping the land permanently open.

In terms of the impact on the Green Belt, the proposed changes to the land form will be minimal. While some trees will be removed to accommodate the proposal, the specimen trees and areas of woodland with the greatest visual landscape and ecological value will be retained. Generally, it is considered that the visual impacts of the proposal are unlikely to be of significant detriment to the character of this part of the Green Belt.

The application has demonstrated that the proposed development could be completed without detriment to the recognised ecological value of this area, including protected species and the adjacent Nature Conservation Sites.

The Flood Risk Assessment finds that the Ruislip Lido is not such a significant factor in the flooding problems in the Cannon Brook, and its storage provides considerable flood alleviation benefit to the local community. Subject to conditions, flood risk would not increase.

The proposals would be unlikely to lead to conditions detrimental to highway and pedestrian safety or to traffic congestion on the local road network.

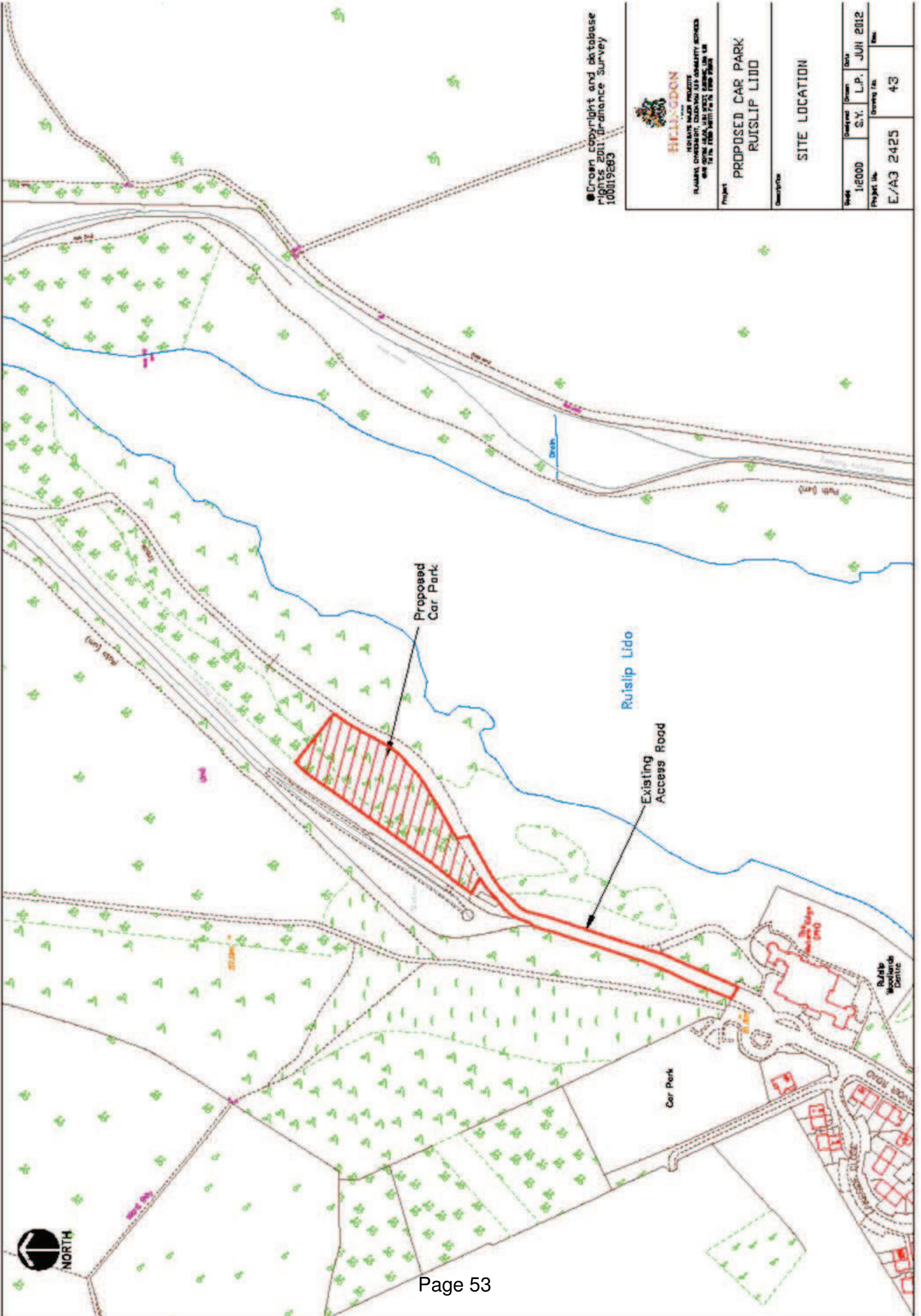
Approval is therefore recommended accordingly.

11. Reference Documents

London Plan (July 2011)
National Planning Policy Framework
Council's Supplementary Planning Document: Accessible Hillingdon
Council's Supplementary Planning Guidance: Community Safety by Design
Hillingdon Unitary Development Plan Saved Policies (September 2007)
Responses from consultees

Contact Officer: Karl Dafe

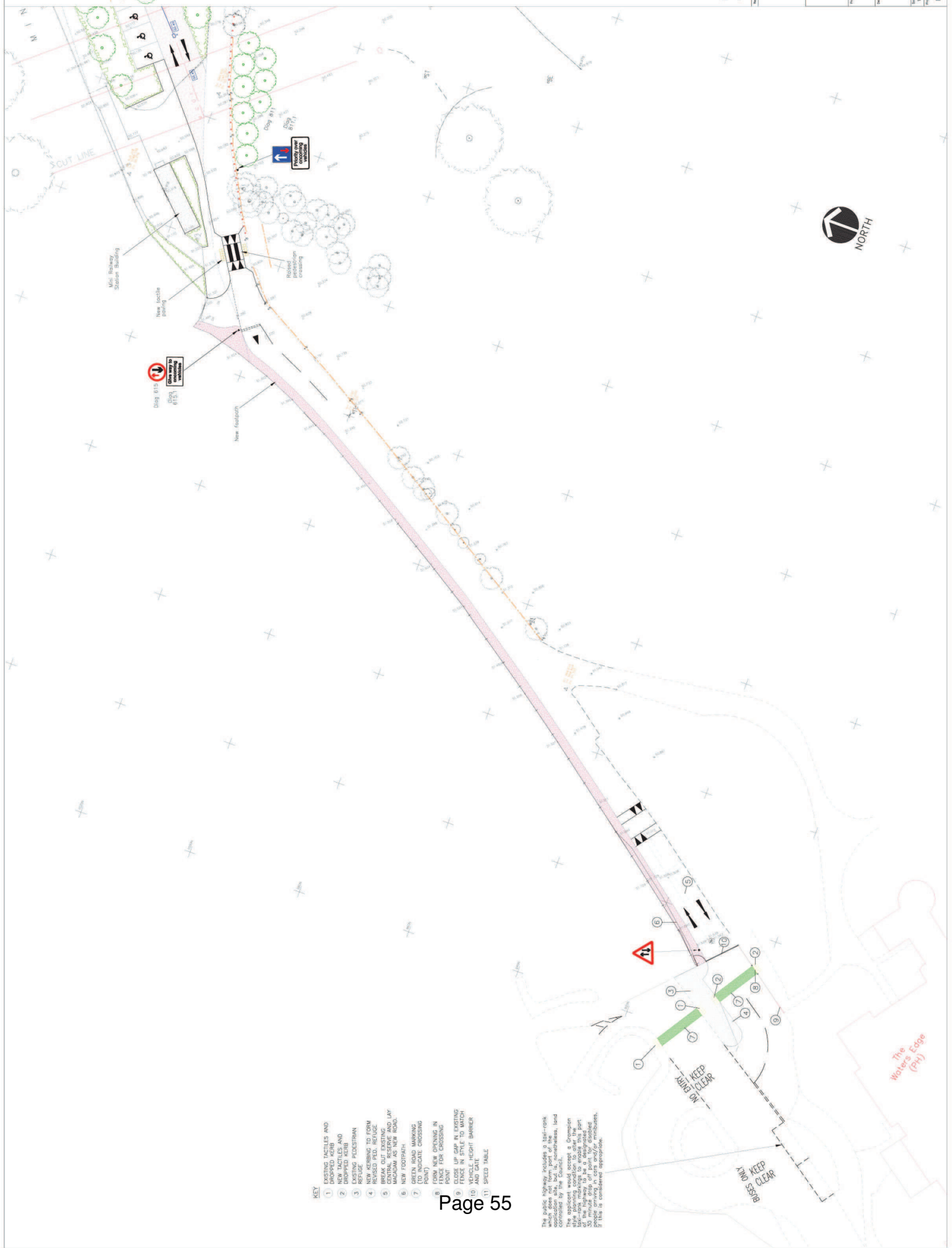
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Project	PROPOSED CAR PARK RUISLIP LIDO
Client	SITE LOCATION
Scale	1:6000
Drawn	S.Y.
Checked	L.P.
Date	JUN 2012
Project No.	E/A3 2425
Drawing No.	43

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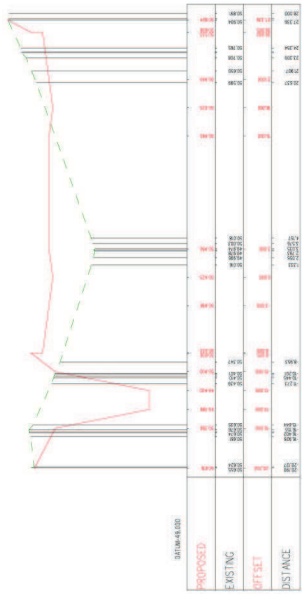
- KEY**
- 1 EXISTING FACILES AND DROPPED KERB
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 - 11 EXISTING FACILES AND DROPPED KERB

The public highway includes a foot-kerb which does not form part of the controlled area, and is controlled by the Council. The applicant would accept a Corporation Agreement to enable this part of the highway to be used for a 35 minute drop of goods by disabled vehicles, if this is considered appropriate.

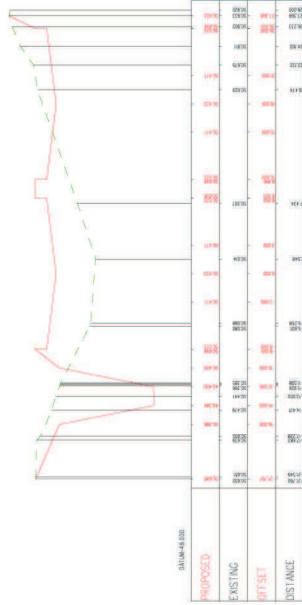
Notes under re-drafted plan 01/2012	
D	Additional tree planting on 'Waters Edge' Feb 2012

HILLSDOWN	
PROPOSED CAR PARK AND BUS STOP LAYOUT	
2 OF 2	
Project No.	E/AO 2425
Issue No.	29
Date	AUG 2010
Author	C

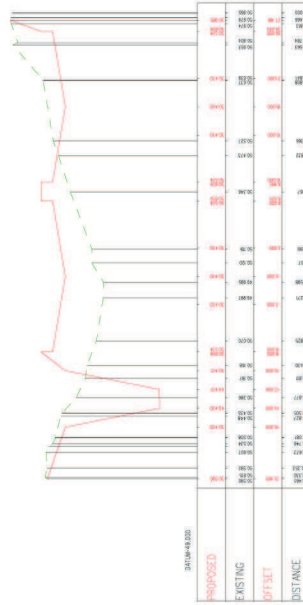




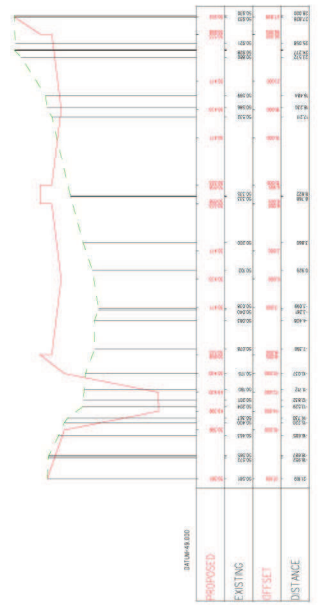
CHANGE 140,000



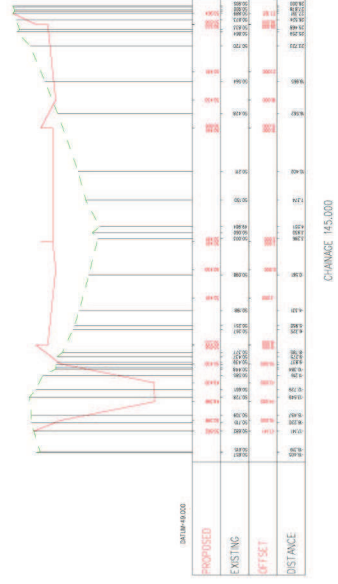
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CHANGE 220,000



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LONDON BOROUGH OF HELLINGDON
Planning, Environment, Education
and Community Services Directorate
Highways
Major Projects

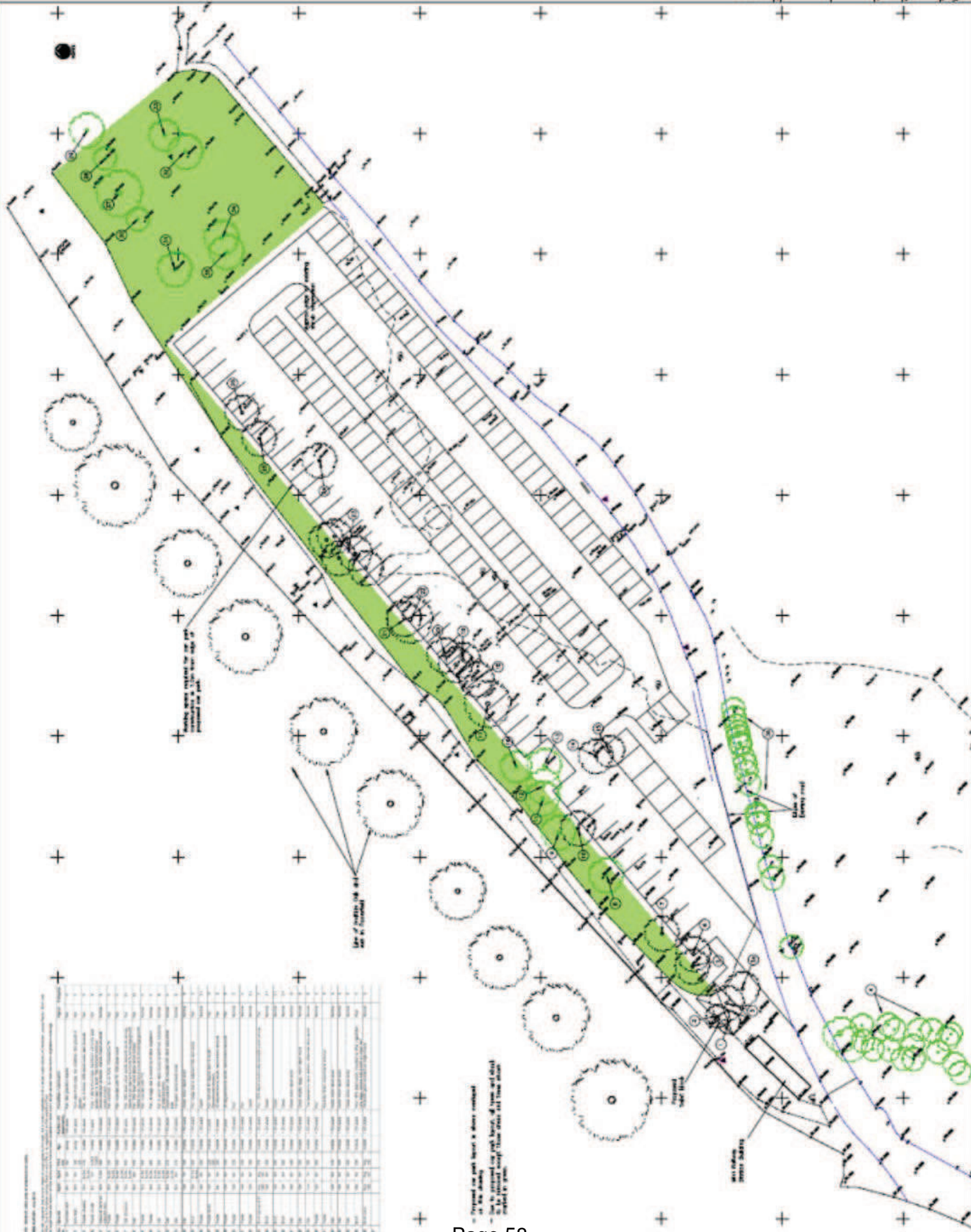
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Name	PROPOSED CAR PARK BUJUP L00
Number	CAR PARK CROSS SECTIONS 20F2 CH 03 - 145M
Date	10/02/22
Scale	1:1000
Sheet	10 of 10
Drawn By	A
Checked By	42
Approved By	

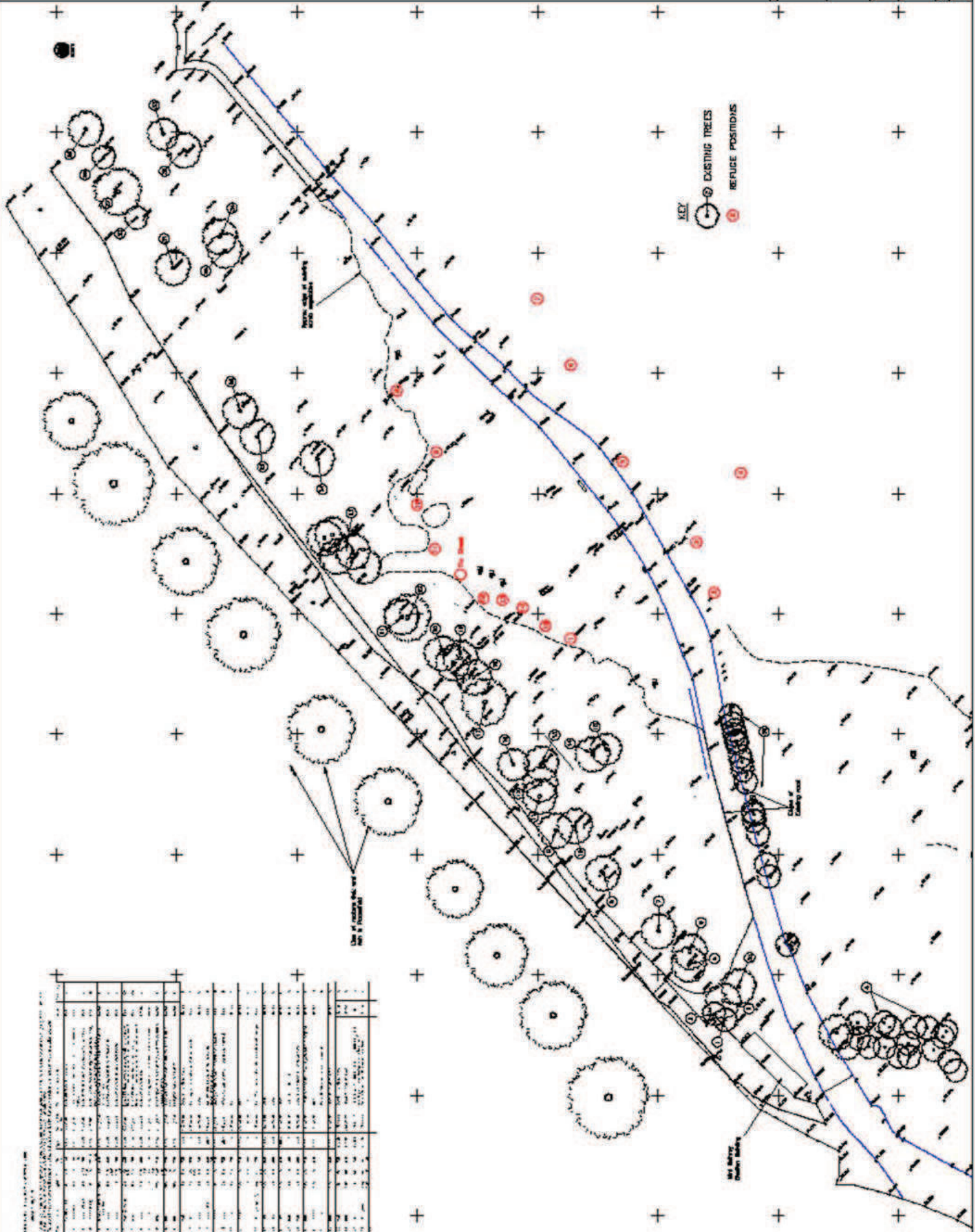
1. All trees to be removed shall be removed prior to construction.
 2. All trees to be preserved shall be preserved in accordance with the approved tree preservation plan.
 3. All trees to be preserved shall be preserved in accordance with the approved tree preservation plan.

PROJECT: ...
 SHEET: ...
 DATE: ...

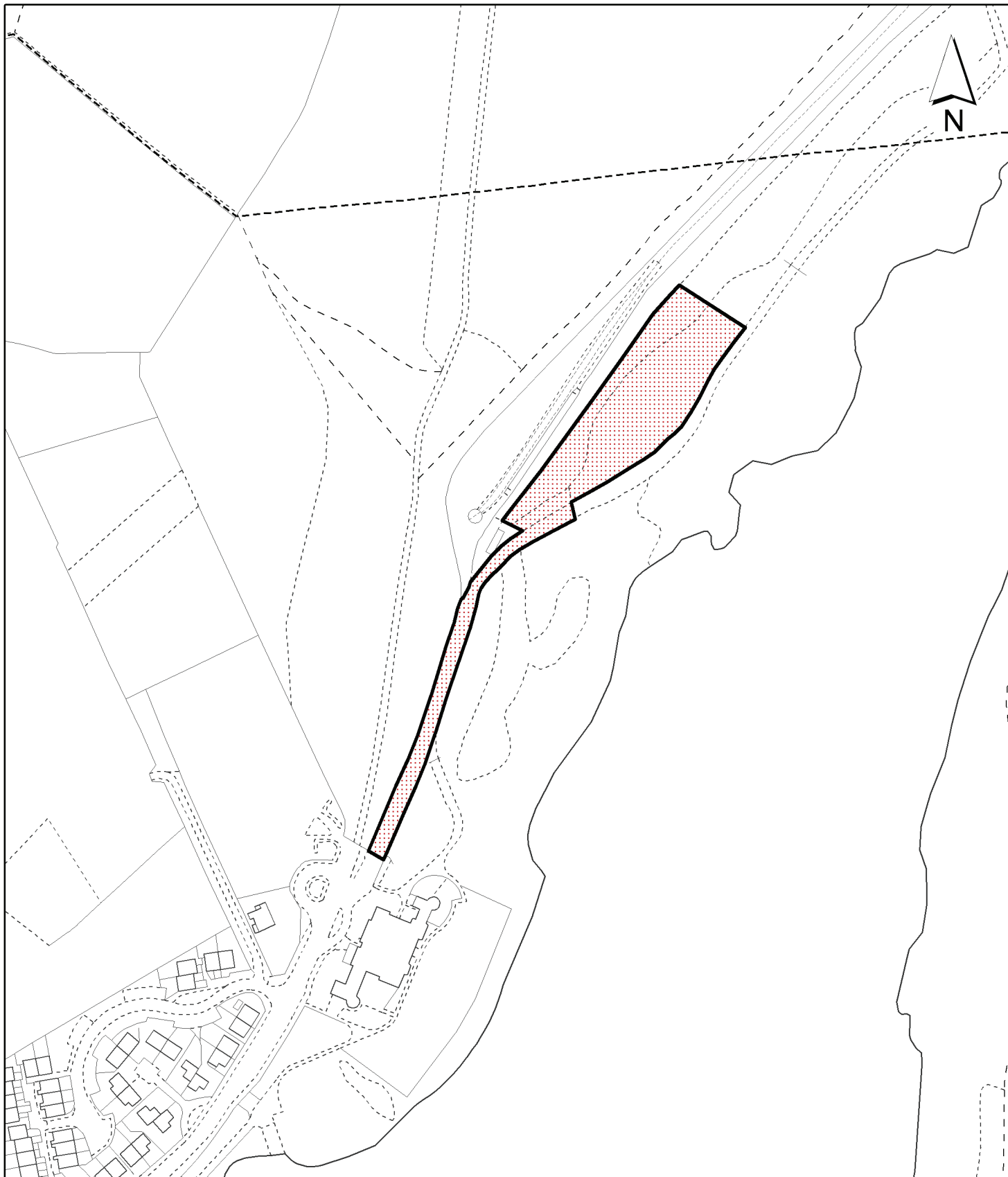
DATE	BY	REVISED
...





NO.	DESCRIPTION	QUANTITY	UNIT	PRICE	TOTAL
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No.	Tree No.	Tree Name	Species	Height (m)	DBH (cm)	Condition	Notes
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3	3
4	4
5	5
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8	8
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<p>Notes</p> <p> Site boundary</p> <p>For identification purposes only.</p> <p>This copy has been made by or with the authority of the Head of Committee Services pursuant to section 47 of the Copyright, Designs and Patents Act 1988 (the Act). Unless the Act provides a relevant exception to copyright.</p> <p>© Crown copyright and database rights 2012 Ordnance Survey 100019283</p>	<p>Site Address</p> <p style="text-align: center;">Ruislip Lido Reservoir Road Ruislip</p>		<p>LONDON BOROUGH OF HILLINGDON Planning, Environment, Education & Community Services Civic Centre, Uxbridge, Middx. UB8 1UW Telephone No.: Uxbridge 250111</p>
	<p>Planning Application Ref:</p> <p style="text-align: center;">1117/APP/2010/1997</p>	<p>Scale</p> <p style="text-align: center;">1:2,500</p>	 <p style="text-align: center;">HILLINGDON LONDON</p>
	<p>Planning Committee</p> <p style="text-align: center;">North Page 61</p>	<p>Date</p> <p style="text-align: center;">July 2012</p>	

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HILLINGDON LONDON

Meeting:	North Planning Committee		
Date:	Thursday 12th July 2012	Time:	7.00pm
Place:	Council Chamber, Civic Centre, Uxbridge		

ADDENDUM SHEET

Item: 1	Page: 1	Location: Ruislip Lido, Reservoir Road
Amendments/Additional Information:		Officer Comments
Revised car park layout plans received. Delete: E/A0 2425/29 REV. C (2 of 2) E/A0 2425/31 REV. H (1 of 2) E/A0 2425/32 REV. E (planting) Add: E/A0 2425/29 REV. D (2 of 2) E/A0 2425/31 REV. J (1 of 2) E/A0 2425/32 REV. G (planting)		The width of a short stretch of the access road has been widened in the vicinity of the proposed pedestrian crossing, where it narrowed to single lane, in order to allow 2 way traffic. The amendments are in response to comments from the Highway Engineer, to ensure that highway and pedestrian safety is maintained.
Dates of amendments Add: 18/6/2012, 21/6/2012, 4/7/2012, 9/7/2012.		To ensure completeness of the report.
RECOMMENDATION Delete: Approval, subject to no objections from Natural England and any additional conditions Natural England may seek to impose and the following conditions: Add: Approval, subject to the following conditions:		Natural England has raised no objections to the proposal, subject to conditions and informative.
Natural England's response to the revised application has been received. The letter has been attached as an appendix to this addendum. Natural England raises no objections subject to conditions and an informative.		The response is noted and suggested conditions and informative added.
Add condition 18 No storage, access or encroachment shall take place within the Ruislip Woods SSSI. All contractors working on site shall be made aware of this requirement and shall be provided with a map that clearly shows the boundaries of the		Condition added at the request of Natural England. REASON In order to comply with Section 28 of the Wildlife and Countryside Act 1981 (as amended)

<p>Ruislip Woods SSSI in relation to the development site.</p>	
<p>Add condition 19</p> <p>Prior to the commencement of any works which may affect great crested newts or their habitat, a detailed mitigation strategy shall be submitted to, and approved in writing by the Local Planning Authority. All works shall then proceed in accordance with the approved strategy with any amendments agreed in writing.</p>	<p>Condition added at the request of Natural England.</p> <p>REASON To protect and enhance wildlife in accordance with the NPPF and Policy 7.19 of the London Plan (July 2011).</p>
<p>Add condition 20</p> <p>Before the development hereby permitted is commenced, a scheme shall be submitted to, and approved in writing by the Local Planning Authority, detailing how external litter bin facilities for users of the car park will be provided. This shall include a timescale for the provision of the facilities. The approved means, siting and timescale for the provision of the facilities shall be implemented in accordance with the agreed scheme and thereafter permanently maintained.</p>	<p>REASON To protect the visual amenities of the surrounding area and to safeguard the interests of the amenities of visitors to the Lido, in accordance with Policies BE13 and OE1 of the Hillingdon Unitary Development Plan Saved Policies (September 2007).</p>
<p>Add condition 21</p> <p>Development shall not begin until details of a parking management scheme, including the method of control of opening times, control of access, security, waste management, disabled access and maintenance has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented in accordance with the approved details and thereafter shall be maintained as such, unless otherwise agreed in writing by the Local Planning Authority.</p>	<p>REASON In order to comply with the terms of the application and to ensure pedestrian and vehicular safety and convenience, in compliance with Policy AM14 of the adopted Hillingdon Unitary Development Plan Saved Policies (September 2007) and Chapter 6 of the London Plan (July 2011).</p>
<p>Amend condition 4 (Traffic Arrangements)</p> <p>Replace the words: '(including where appropriate revised carriageway widening, footways, speed table, tactile paving, bollards, timber post and rail fencing and means of surfacing (including resin bonded gravel surface))'</p>	<p>To provide clarity and precision to the condition.</p>

<p>Add: '(including traffic management, signage, speed tables, tactile paving, bollards, fencing and means of surfacing)'</p>	
<p>Add informative 7</p> <p>The applicant is advised that should storage, access or encroachment within the Ruislip Woods SSSI be found to occur as a result of the proposals during or after the works, this will be considered an offence under Section 28 of the Wildlife and Countryside Act 1981 (as amended) whereby the applicant may be liable on summary conviction to a maximum fine of £20,000 or on conviction on indictment to an unlimited fine.</p>	<p>Informative added at the request of Natural England.</p>
<p>6 additional letters of objection and one letter raising no objection from Northwood Hills Residents' Association have been received in response to the latest consultation. This includes a letter from Friends of Ruislip Lido, which has been attached as an appendix to this addendum. The main points raised are summarised below:</p> <p>1. No need for the additional car park at the expense of natural woodland.</p> <p>The report does not show that a very special circumstances case has been made for this development.</p> <p>We do not accept that the case has been made for the necessity of this development.</p> <p>2. The Committee should be moved back to a future date, as the officer report was written during the re-consultation period.</p> <p>3. Re-consultations only sent to those who initially responded on line.</p>	<p>1. These issues have been dealt with in the officer's report.</p> <p>2. The 14 day re-consultation related to amendments to the Transport Statement to correct minor factual errors and to a revised Ecological Mitigation Strategy, which included the results of additional species surveys. These issues were fully addressed in the officer's report, with a recommendation for approval, subject to no objections from Natural England. The additional comments from local residents to the consultations on the additional information are fully summarised in this addendum and raise no new substantive issues.</p> <p>3. Consultations were sent by e-mail to those who responded on line. Individual letters were sent to those who made representations by post. These letters were dispatched on 22 June 2012, giving local residents the requisite 14 days to make</p>

<p>4. No objections to the revised proposal.</p> <p>5. The Council fully responsible for damage to a National Nature Reserve and SSSI in respect of its nature conservation importance including bats, reptiles and great crested newts.</p> <p>6. The additional ecological reports are inadequate, concerning protected species and fail to meet the methodology quoted by the report.</p> <p>7. The ecological mitigation strategy does not rest upon available data or required research, nor does it consider impacts other than in a superficial way. The Council is not only in breach of its own policies but the Habitats Directive and Habitats Regulations.</p> <p>8. Under the Habitat Directive and European Protected Species, the impacts of this development require the consideration of alternatives and other tests under Regulation 44 of the Habitats Regulations to be clearly described and presented.</p> <p>9. Strong concerns regarding the approach to a development at the edge of an National Nature Reserve and SSSI and Committee has a clear duty to refuse the application and question how the Council is letting applications like this get so far without the correct appraisals.</p> <p>10. Approval based on poor quality work leaves the Council exposed both to Judicial</p>	<p>representations.</p> <p>4. Noted.</p> <p>5. The site is not within the SSSI. Nevertheless the Council has a duty to make sure that the development does not harm the integrity of the site. Natural England has been consulted and is responsible for making sure that the development does not harm the integrity of the site. The Local Planning Authority has not ignored the issue. Had Natural England indicated that the development would have a significant detrimental impact on the SSSI, then the Council would be likely to refuse the application. It is considered that the loss of this relatively small piece of land is unlikely to have any bearing on the SSSI.</p> <p>6. The Council has commissioned qualified experts who have carried out the surveys in accordance with the relevant guidelines. The Great Crested Newt investigation was taken at a sub-optimum time, but Natural England has provided comments on this. The other surveys were considered suitable for what was being investigated and the limitations outlined where appropriate. It is considered that the Council is in possession of enough information to make an informed decision based on the Natural England standing advice.</p> <p>7. Natural England has commented on the relationship with the SSSI. Further conditions have been recommended to improve the neighbouring sites.</p> <p>8. The Council has considered the tests of the Habitats Directive relevant to the likely harm to protected species. The development is unlikely to have an impact on the long term conservation of species and is responding to a shortfall in car parking in the wider public interest.</p> <p>9. The development is not considered to have a detrimental impact on the SSSI for the reasons set out above, and Natural England share this view. The Council has strongly considered the ecological value of this and the surrounding site, against the need for the development. Natural England will have the final say on the impacts on European Protected Species and this in turn will reinforce the position with regards to the Habitats Directive.</p> <p>10. The Council has sought the views of highly qualified independent experts to fully inform a</p>
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Review and notoriety, resulting from clear breaches of Best Practice and legal process and is not in keeping with the Defra's policy towards species and habitats.

The report does not take adequate notice of the information supplied concerning the existence on site of three species of reptile and Great Crested Newts in a pond within 150m of the site.

11. The Location Plan does not include the area for planting of trees to stop cars floating out of the car park during flooding.

12. The total area of the site is now more than the 0.5 Hectares quoted in the report and should be corrected.

13. The access road is too narrow.

14. Conflict with the Council's Car Parking and Climate Change Policies have been ignored.

15. No data has been produced to demonstrate existing parking conditions at Ruislip Lido. There is no evidence/car parking survey to indicate on how many days in any year the existing car park is full or for how long each day.

16. This meeting is put back for an accurate and detailed application to be resubmitted. That the committee call for further reports into the necessity and alternatives to this application to be scoped prior to any hearing.

The signage to Breakspear crematorium overflow car park should be improved.

17. Water Operating levels and flood have not been addressed. There remain serious flood risk issues for downstream properties whose residents have not been consulted including properties in Ladygate Lane.

The risks that the site could flood up to a depth of 0.45m and of cars floating out of the car park should not be incurred by

planning decision. This was a responsible approach. Furthermore, the independent ecological surveys did not reveal matters of overbearing reason not to develop the site. The Council considered the relevant standing advice and sought comments from Natural England regarding European Protected Species. The Council considers the need for further mitigation which can be conditioned as part of any subsequent approval.

11. The area is within Council control and additional tree planting has been conditioned.

12. The point is noted. The access road adds 0.13 hectares to the site area.

13. The issue of the width of the access road and footpath has been addressed in the report. The Highway Engineer considers that the design of the access road is satisfactory.

14. The issue of compliance with Council car parking policies has been addressed in the report. This is a small scale development, that is managing existing traffic and no objections are raised in relation to carbon policies.

15. It is evident that the existing car park does reach capacity at peak times. The new car park would only be open at when the existing car park is full and results in unnecessary traffic movements and conditions prejudicial to highway and pedestrian safety.

16. Justification for the necessity of the overflow car park and alternative sites have been addressed in the report.

Breakspear Crematorium car park is a considerable distance (nearly 700m) from the Lido entrance and would not be suitable for the elderly or infirm.

17. Flood related matters have been dealt with comprehensively in the report. Properties in Ladygate Lane have been consulted.

<p>building this facility.</p> <p>No plan of the alternative sites considered in the sequential appraisal.</p> <p>18. The applicant has continued to make alterations to this application, after even the planning report was published</p> <p>19. There is another planning application that is awaiting submission intrinsically linked to this application, and should have been submitted alongside this, as issues of access, drainage, and environmental impact are the same.</p> <p>20. Concern over highway and pedestrian safety within the Lido and at the entrance, where there are already complex conflicting vehicular and pedestrian movements.</p> <p>Adverse Impact on the usage of Willow Lawn and concerns about use of the path round the Lido.</p> <p>Siting this disabled drop off point, at what is likely to be an extremely busy and congested area, is of concern.</p> <p>21. Should this application be approved it would be an Abuse of Article 6 of The Human Rights Act 1998 and contrary to the 'Wednesbury Principles' of unreasonableness and would leave the Council open to challenge.</p>	<p>18. The amendments are minor in nature and relate specifically to the detailed design of the access, in the vicinity of the raised pedestrian crossing.</p> <p>19. Any future application will be determined on its individual merits.</p> <p>20. Highway and pedestrian safety issues have been addressed in the report. A new footway, traffic calming and fencing are proposed to ensure that there is no conflict between pedestrians, including children and the traffic accessing the car park.</p> <p>21. The Council does not consider that approval of this application would be in conflict with the Human Rights Act.</p>
<p>POLICY Page 12 and informative 4, page 8</p> <p>Delete Saved Policy BE26 and replace with Saved Policy OL26 (Trees and Woodland)</p> <p>Add: Saved Policies OE7 and OE8 (flooding)</p>	<p>To address typographical errors and to ensure completeness of the report.</p>

Appendix 1: Letter from Natural England

Date: 05 July 2012
Our ref: 57158
Your ref: 1117/APP/2010/1997



James Rodger
London Borough of Hillingdon
3 North
Civic Centre
High Street
Uxbridge UB8 1UW

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

T 0300 060 3900

Dear Mr Rodger

Planning consultation: Construction of car park consisting of 150 parking spaces (as well as space for motor cycle parking). Re-consultation following receipt of revised plans, additional and amended supporting reports and amended application form.

Location: Ruislip Lido, Reservoir Road, Ruislip

Thank you for your consultation on the above dated 22 June 2012.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England's comments in relation to this application are provided in the following sections.

Ruislip Woods Site of Special Scientific Interest and National Nature Reserve

The application site lies close to Ruislip Woods Site of Special Scientific Interest (SSSI) and National Nature Reserve (NNR). Given the proximity of the SSSI and the potential for damage as a result of storage or disposal of materials, and operation of machinery or plant within the SSSI, should the Council be minded to grant permission, we advise that the following informative is appended to any consent:

- The applicant is advised that should storage, access or encroachment within the Ruislip Woods SSSI be found to occur as a result of the proposals during or after the works, this will be considered an offence under Section 28 of the Wildlife and Countryside Act 1981 (as amended) whereby the applicant may be liable on summary conviction to a maximum fine of £20,000 or on conviction on indictment to an unlimited fine.

We advise that the following should be secured by way of a condition on the planning permission:

- All contractors working on site should be made aware of the informative and should be provided with a map that clearly shows the boundaries of the Ruislip Woods SSSI in relation to the development site.

If your Authority is minded to grant consent for this application without the conditions recommended above, we refer you to Section 28I (6) of the *Wildlife and Countryside Act 1981* (as amended), specifically the duty placed upon your authority, requiring that your Authority;

- Provide notice to Natural England of the permission, and of its terms, the notice to include a statement of how (if at all) your authority has taken account of Natural England's advice; and
- Shall not grant a permission which would allow the operations to start before the end of a period of 21 days beginning with the date of that notice.

Protected species

The additional information provided in support of the application provides information on the presence of widespread reptiles, bats and great crested newts. Natural England's comments on these species are provided below.

Bats

Whilst the surveys undertaken identified a number of species of bat foraging and commuting across the application site, no evidence of roosts were recorded. Natural England **does not object** to the proposed development. On the basis of the information available to us, our advice is that the proposed development would be unlikely to affect bats.

Great crested newts

Whilst Natural England acknowledges that the survey was undertaken slightly late in the season and access to the pond edge was limited, great crested newts were recorded within Pond 2 (approximately 145 metres from the application site).

Natural England **does not object** to the proposed development. On the basis of the information available to us, our advice is that the proposed development is likely to affect great crested newts. We are satisfied however that the proposed mitigation would maintain the population identified in the survey report. Should the Council be minded to grant permission for this application, we advise that the following condition should be attached to any consent:

- Prior to the commencement of any works which may affect great crested newts or their habitat, a detailed mitigation strategy shall be submitted to, and approved in writing by the Local Planning Authority. All works shall then proceed in accordance with the approved strategy with any amendments agreed in writing.

The great crested newt is a European Protected Species. A licence is required in order to carry out any works that involve certain activities such as capturing the animals, disturbance, or damaging or destroying their resting or breeding places. Note that damage or destruction of a breeding site or resting place is an absolute offence and unless the offences can be avoided through avoidance (e.g. by timing the works appropriately), it should be licensed. In the first instance it is for the developer to decide whether a species licence will be needed. The developer may need to engage specialist advice in making this decision. A licence may be needed to carry out mitigation work as well as for impacts directly connected with a development.

Natural England's view on this application relates to this application only and does not represent confirmation that a species licence (should one be sought) will be issued. It is for the developer to decide, in conjunction with their ecological consultant, whether a species licence is needed. It is for the local planning authority to consider whether the permission would offend against Article 12(1) of the Habitats Directive, and if so, whether the application would be likely to receive a licence. This should be based on the advice we have provided on likely impacts on favourable conservation status and Natural England's guidance on how we apply the 3 tests (no alternative solutions, imperative reasons of overriding public interest and maintenance of favourable conservation status) when considering licence applications.

Widespread reptiles

The information supplied in support of the application highlights the impacts resulting from this proposal upon widespread reptiles. Detailed advice on survey effort and mitigation requirements for these species can be found within our protected species standing advice available from <http://www.naturalengland.org.uk/ourwork/planningtransportlocalgov/spatialplanning/standingadvice/default.aspx>. In accordance with our standing advice, we recommend that you consult the advice to establish whether sufficient survey effort has been undertaken to fully assess the impacts of this proposal along with the appropriateness of any necessary mitigation measures proposed in respect of reptiles.

I trust the comments are helpful. For clarification of any points in this letter, please contact Sean Hanna by telephone on 0300 060 4792 or by email to sean.hanna@naturalengland.org.uk. For all other correspondence, please contact the above address or email consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

A handwritten signature in cursive script that reads "Sean Hanna".

Sean Hanna
Adviser
Ashford Land Use Operations Team

Appendix 2: Letter from FORL

Re: Planning Application - Car Park at Ruislip Lido 1117/APP/2010/1997

I am writing to you on behalf of the Friends of Ruislip Lido and the Lido Residents Group to express our concerns about the officer's report recommending approval to the above planning application which is being reported to a Special Planning Committee on Thursday 12th July 2012.

The site is within the Green Belt designation in the Unitary Development Plan and as indicated in the officer report it is necessary to demonstrate a "very special circumstances case" for the proposed development.

However, it is demonstrable that the report does not show that a very special circumstances case has been made for this development.

The Transport Statement submitted by the applicant in support of the application states that Hillingdon Borough Staff have provided information on the parking conditions at Ruislip Lido. However, no data has been produced in the application to support this. There is no evidence to indicate on how many days in any year the existing car park is full or for how long each day. There is no car parking survey to support the application.

Our objections to this application and the rushed process now to determine the application are based on the following points:-

1. Abuse of Process

- The application has recently been subject to re-consultation on 22nd June 2012 giving 14 days for responses. The Special Planning Committee has been arranged for a date less than one week after close of consultation with the officer's report being produced several days before the end of the consultation period.
- The report does not address all of the issues raised in residents' objection letters. If, therefore, a decision is made by the Committee on Thursday to agree the officer recommendation to approve the application we consider this would be an abuse of process under Article 6 of the Human Rights Act 1998.
- Further to this the applicant has continued to make alterations to this application including an amended plan placed on the planning website on the 4th July, after even the planning report was published surely this cannot be correct.
- There is also another planning application that is awaiting submission but is intrinsically linked to this application, and should have been submitted alongside this, as issues of access, drainage, and environmental impact are the same. Therefore this application should be withdrawn and resubmitted with these buildings included.

2. Necessity

As indicated above no evidence has been produced to support the application of need for the car park and there is therefore no argument to support the contention that there is a "very special circumstances case" to allow development as a departure from the Development Plan.

3. Safety

The proposed development would introduce an additional vehicular access into the Lido at the end of Reservoir Road where there are already complex conflicting vehicular and pedestrian movements including access and egress to the existing car park, a bus turnaround, pedestrian movements to and from the existing car park, Poor's Field, the Lido

grounds and The Water's Edge Pub. It will be particularly difficult for vehicles to access the new car park if they have initially tried to park in the existing car park as they would have to turn across oncoming traffic.

The Flood Risk Assessment indicates that the site could flood up to a depth of 0.45m in the event of a severe flood and that cars could be at risk of floating out of the car park, requiring planting of trees to stop them floating into the lake. Also, the report recognised that it would be necessary to provide an evacuation plan. These risks should not be incurred by building this facility in the floodplain in the first place.

4. Environment

The report does not take adequate notice of the information supplied concerning the existence on site of three species of reptile and Great Crested Newts in a pond within 150m of the site. Development of this site should be avoided unless there is no alternative. We do not accept that the case has been made for the necessity of this development at all (see above). In addition, although the Officer's report refers to a Sequential Test having been carried out no plan of the alternative sites considered has been attached to the report so that it is impossible to assess whether this has been given appropriate consideration.

5. Adverse Impact on the usage of Willow Lawn.

Willow Lawn is a very popular area for visitors to picnic and for children to play ball games. On busy days this area is frequently very well used. The enjoyment of visitors would be severely impaired by the proposed new vehicular access to the car park with cars and motorcycles creating noise and fumes, as well as the safety of these groups. Under this plan no longer will you be able to walk unimpeded around the circumference of the Lido, but have to cross the new road twice, just to get to the far side of Willow Lawn. We have voiced concerns with regard disabled access to the path as well as pedestrians with pushchairs, none of these concerns have been answered by the applicant.

6. Councils Parking and Climate Change Policies

The report does not address the concern raised by residents that this application is contrary to the Council's Car Parking and Climate Change Policies which seek to reduce dependence of cars and encourage use of public transport. No attempt seems to have been made by the applicant to consider alternative modes of transport such as Park and Ride or to discuss frequency of buses with the local operators.

It is our submission; for the reasons set out above that should this application be approved it would be an Abuse of Article 6 of The Human Rights Act 1998 and contrary to the 'Wednesbury Principles' of unreasonableness and would leave the Council open to challenge on these grounds.

The Friends of Ruislip Lido and the Ruislip Lido Residents group would urge members to insist this meeting is put back for an accurate and detailed application to be resubmitted. That the committee call for further reports into the necessity and alternatives to this application to be scoped prior to any hearing.

Yours Sincerely

Vicky Brownlee
Chair FORL
friendsofruisliplido@gmail.com