

Report of the Head of Development Management and Building Control Committee Report – Application Report

Case Officer: **Mitchell Heaven**

78998/APP/2024/2281

Date Application Valid:	20.11.2024	Statutory / Agreed Determination Deadline:	20.02.2025
Application Type:	Full	Ward:	Ruislip

Applicant: **London Borough of Hillingdon
(Capital Programme and Works Team)**

Site Address: **Ruislip Lido, Reservoir Road**

Proposal: **Replacement of existing 2 x single storey toilet facilities buildings at Willow Lawn and Woody Bay with 2 x single storey toilet and changing facilities buildings, and associated works and landscaping.**

Summary of Recommendation: **GRANT planning permission subject to conditions**

Reason Reported to Committee: **Required under Part 6 of the Planning Scheme of Delegation (the Council is the Applicant)**



Summary of Recommendation:

GRANT planning permission subject to the conditions set out in Appendix 1.

1 Executive Summary

- 1.1 Planning permission is sought for the replacement of two existing public toilet facilities at Ruislip Lido with two new larger facilities with improved capacity and services to meet visitor demand. Ancillary access works and landscaping are also proposed.
- 1.2 The application site is Ruislip Lido, a water reservoir with an artificial beach, extensive trails, playgrounds, Ruislip Lido Railway and other community facilities. Two areas of works (henceforth referred to as the 'sites') are proposed under the application. The Woody Bay public toilet block site is located on the south-east corner of the Lido, and the Willow Lawn public toilet block is located on the western edge of the Lido. The two public toilet facilities service visitors to the Ruislip Lido.
- 1.3 Both sites are on Green Belt land, located on potentially contaminated land, located within a Nature Conservation Site Grade 1, and located within the Ruislip Motte & Bailey archaeological priority area. Both sites are adjacent to, but not located within, the Ruislip Woods Site of Special Scientific Interest. Neither of the sites are subject to flooding risk.
- 1.4 The site is subject to the following planning history:
 - Approved: The existing Willow Lawn toilet block was granted planning permission in 2012 under application reference 1117/APP/2012/1785.
 - Approved: More recently, a planning application under reference 1117/APP/2017/2188 for the demolition of a workshop building associated with the Lido Railway and construction of a replacement workshop building was approved in 2017.
- 1.5 The applicant has worked cooperatively with the Local Planning Authority (LPA). In response to LPA feedback during the processing of the application, they have provided a revised scheme reducing the roof pitch and height of both proposed buildings.
- 1.6 As Hillingdon Council is the applicant, this minor application must be referred to the Planning Committee for determination.
- 1.7 The main issues which shall be addressed within this Committee Report relate to the appropriateness of the development in the Green Belt, impact on the character and appearance of the site and surrounding area, and impact on local biodiversity.
- 1.8 This Committee Report seeks to provide a comprehensive assessment of the full application and supporting documentation. All material planning considerations have been considered, and it is recommended that planning permission is granted, subject to conditions.

Hillingdon Planning Committee – 13th February 2025

PART 1 – Members, Public & Press

2 The Site and Locality

- 2.1 The application site is Ruislip Lido, a reservoir and artificial beach located on the edge of Ruislip Woods. Two areas of works (henceforth referred to as the 'sites') are proposed under the application. The Woody Bay public toilet block site is located on the south-east corner of the Lido, and the Willow Lawn public toilet block is located on the western edge of the Lido. The two public toilets service visitors to the Ruislip Lido.

Figure 1: Location Plan (Ruislip Lido).



Figure 2: Contextual aerial of Ruislip Lido.



Figure 3: Woody Bay existing Site Plan (Proposed demolition in red).

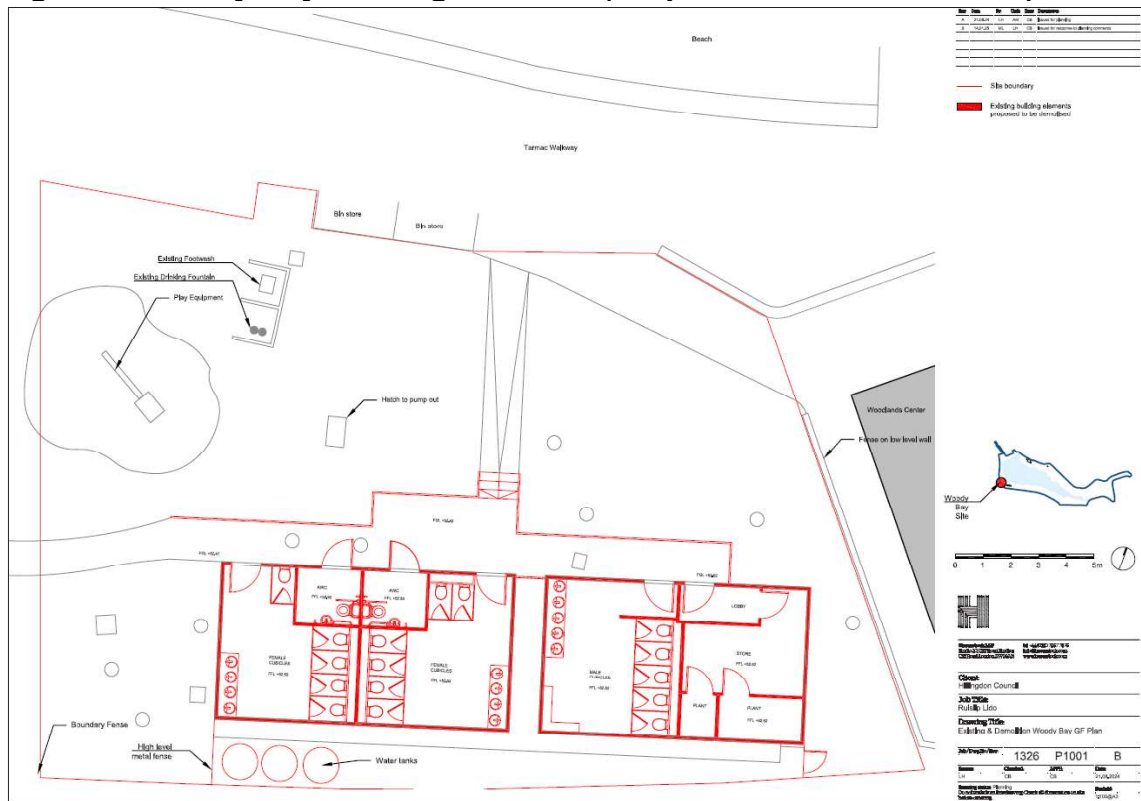


Figure 4: Woody Bay contextual aerial.



Figure 5: Existing Woody Bay toilet block.



Figure 6: Panoramic view of existing Woody Bay toilet block and surrounds.

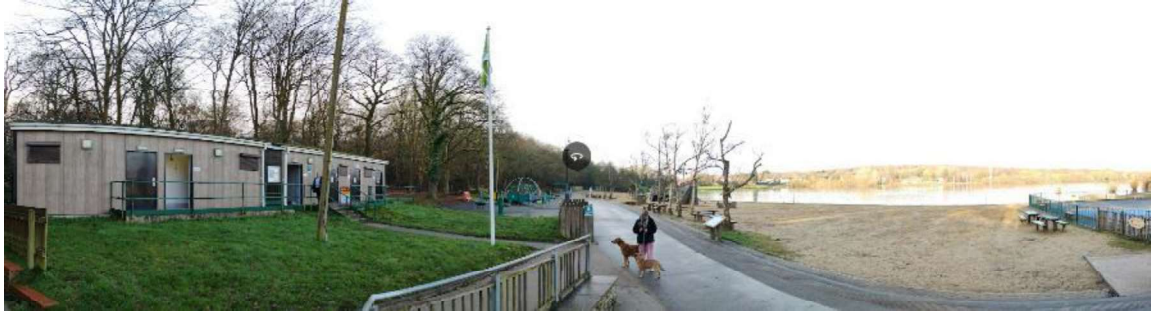


Figure 7: Willow Lawn Existing Site Plan (Proposed demolition in red).



Figure 8: Willow Lawn contextual aerial.



Figure 9: Existing Willow Lawn toilet block.



Figure 10: Existing side elevation of Willow Lawn toilet block as viewed from main vehicle entrance.



- 2.2 The sites are located on Green Belt land and are potentially affected by land contamination according to the Council's GIS. Both sites are located within Ruislip Lido which is an addition to a Nature Conservation Site Grade 1. They are also located within the Ruislip Motte & Bailey archaeological priority area.
- 2.3 Both sites are adjacent to Ruislip Woods (a site of Special Scientific Interest) however no works are proposed within the woods. Additionally, neither site is identified as being subject to flooding either from stormwater runoff or from the Reservoir.
- 2.4 The wider site consists of the Ruislip Lido and associated uses which includes cafes, Ruislip Lido Woodland Centre, Ruislip Lido Railway, Ruislip Lido Beach and various paths and recreational areas.
- 2.5 The sites are surrounded by Ruislip Lido related land and the Ruislip Woods. The closest non-public land is located over 150 metres away from either site.

3 Proposal

- 3.1 The application proposes the replacement of the two existing public toilet facilities at the Willow Lawn and Woody Bay sites with two new public toilet and changing room facilities. These would be in the same location as the existing buildings, which are proposed for demolition. The current facilities are not large enough to manage peak demand in the summer and do not include family changing facilities, failing to cater to the community's needs. The new facilities would significantly increase the capacity of the toilet facilities, improving visitor experience, and would be fully inclusive, meeting all visitors needs including male and female toilets, family changing rooms, accessible toilets, plant rooms and storage areas.
- 3.2 Both new proposed toilet blocks would be single storey, constructed out of brick with zinc roofing and steel doors. Materials have been chosen for their durability and longevity. Colours of the materials have yet to be determined and therefore provision of detailed materials is recommended to be secured via condition of consent in the event of an approval.
- 3.3 The application also proposes to improve the access arrangements to the facilities and proposes supplementary landscaped areas. Detailed landscaping design has not been provided as part of the application, and provision of a detailed landscaping scheme is recommended to be secured via condition of consent in the event of an approval.
- 3.4 No tree removal would occur as part of the application. However, demolition and construction works is proposed in proximity to several mature trees on the site. Supporting arboriculture reports have been provided with the application.
- 3.5 During the processing of the application the Local Planning Authority (LPA) identified that the buildings were overly tall and out-of-keeping with the natural character of the area.
- 3.6 The applicant has proactively responded to the feedback from the LPA to amend the scheme by reducing the roof pitch of the proposed facilities from 45-degrees to 40-degrees, thereby reducing the height of both buildings. The roof pitches were not reduced any further by reason that maintenance access with minimum floor to ceiling heights is required for a water tank to be contained within the roof space of the Woody Bay replacement toilets. The 40-degree pitch would also help to minimise debris such as leaves, sticks and bird feathers from sticking to the roof.

Figure 11: Woody Bay existing Site / Floor Plans (for comparison)



Figure 12: Woody Bay Proposed Site / Floor Plans

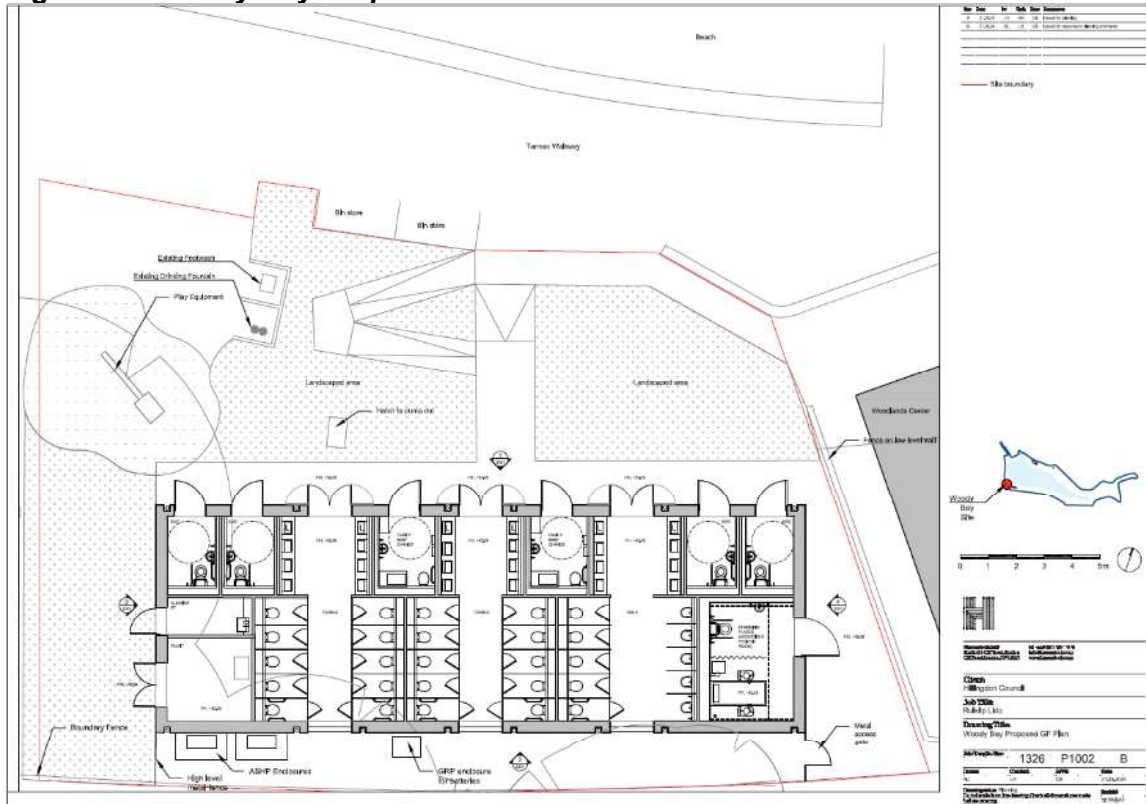


Figure 13: Woody Bay existing Elevations (for comparison)

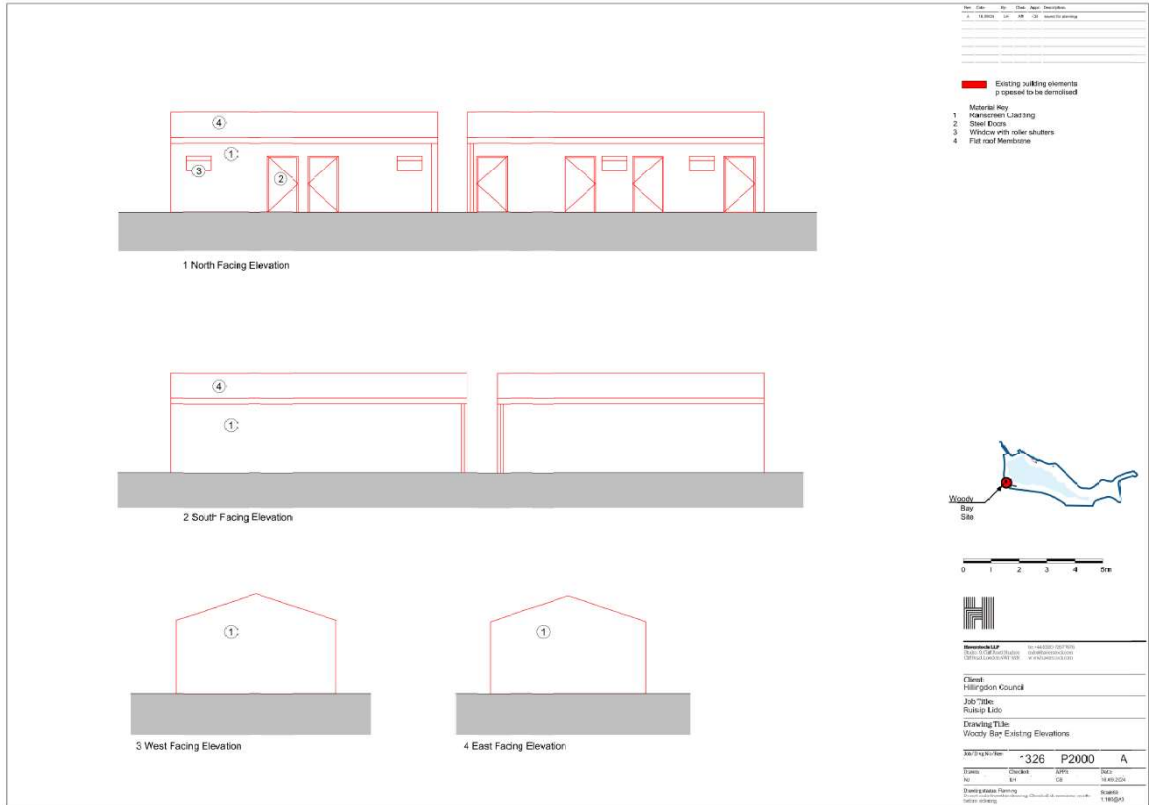


Figure 14: Woody Bay Proposed Elevations

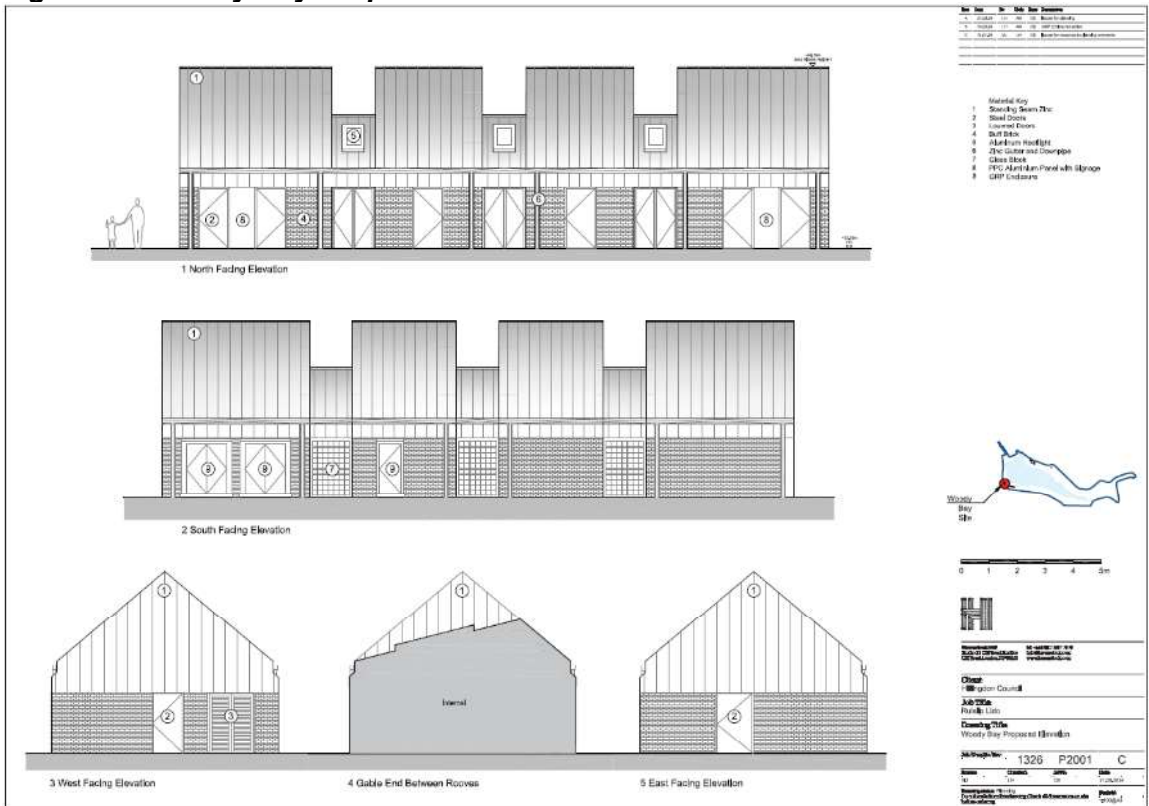


Figure 15: Willow Lawn existing Site / Floor Plans (for comparison)

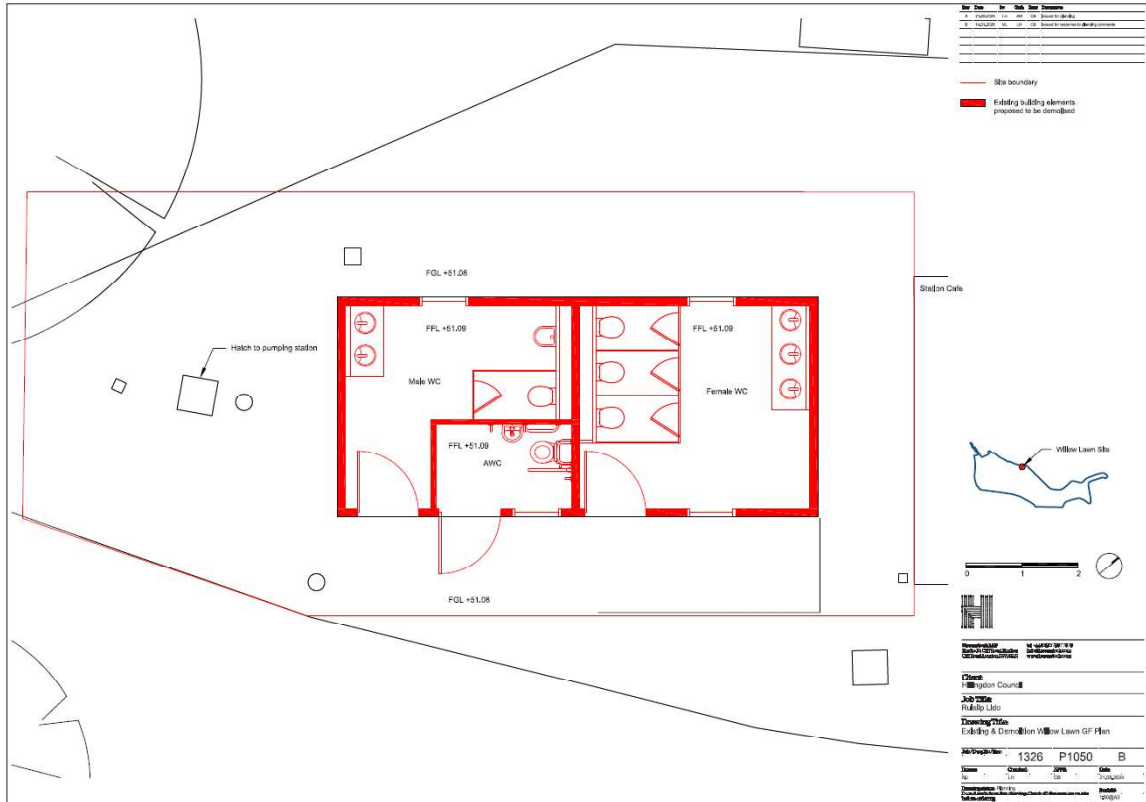


Figure 16: Willow Lawn proposed Site / Floor Plans

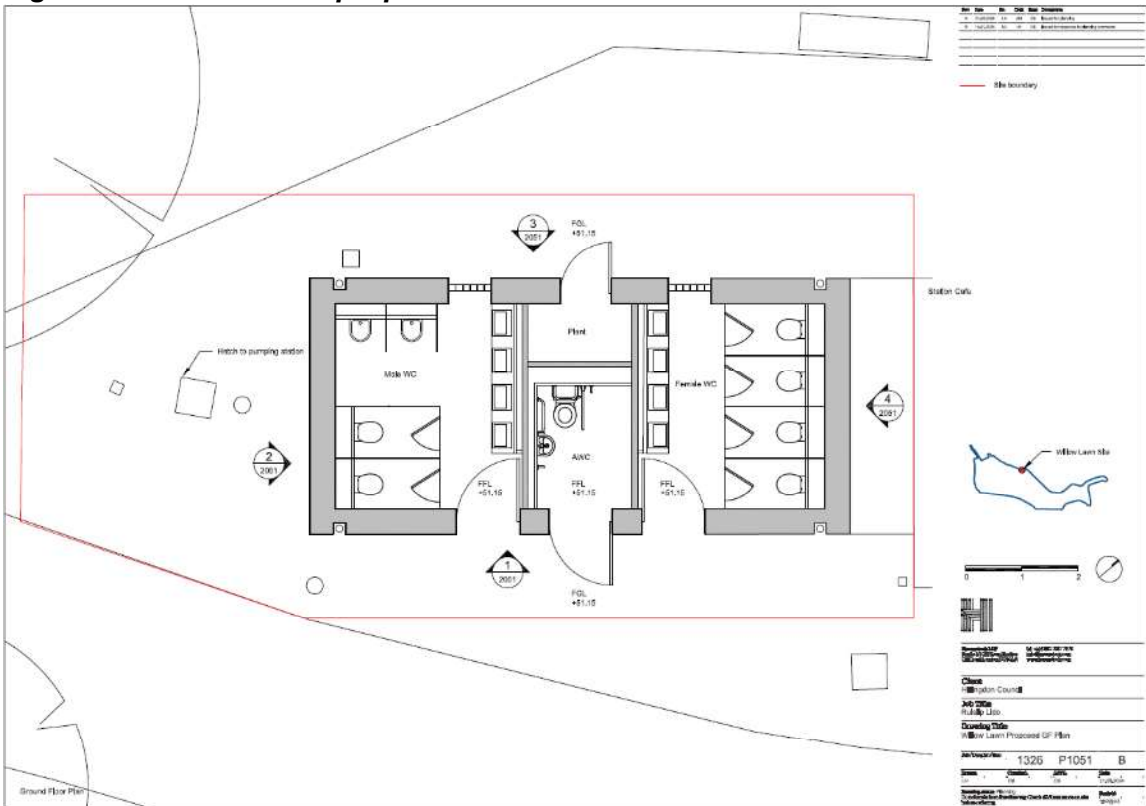


Figure 17: Willow Lawn existing Elevations (for comparison)

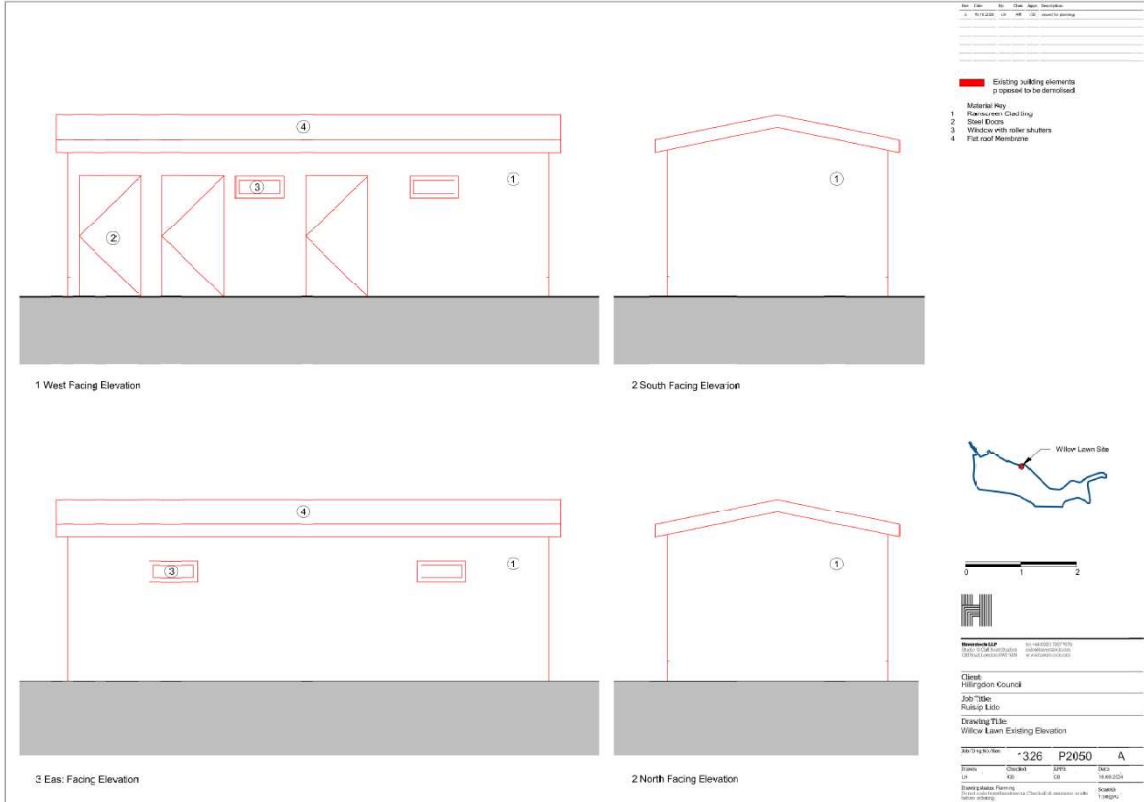
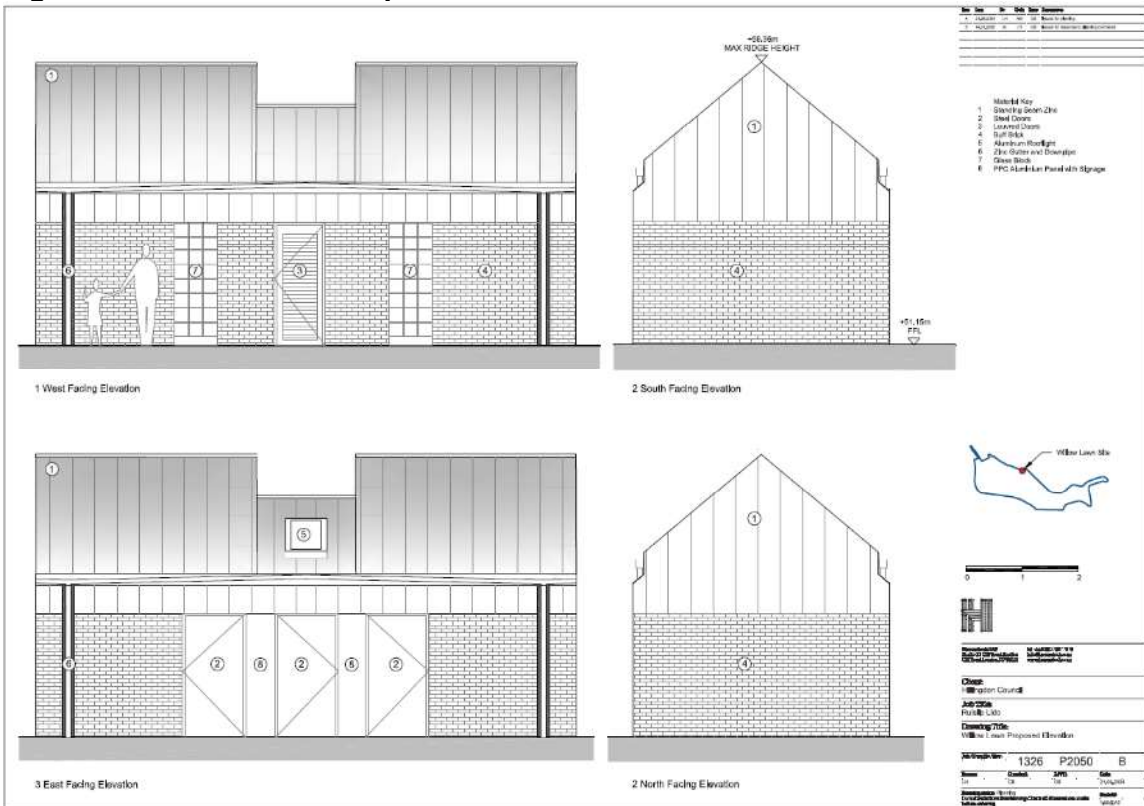


Figure 18: Willow Lawn Proposed Elevations



4 Relevant Planning History

- 4.1 A list of the relevant planning history related to the property can be found in Appendix 2.
- 4.2 The Willow Lawn toilet block was originally granted planning permission in 2012 under application reference 1117/APP/2012/1785.
- 4.3 More recently, under planning application reference 1117/APP/2017/2188 the demolition of an existing workshop building associated with the Lido Railway and construction of a replacement workshop was approved in 2017.

5 Planning Policy

- 5.1 A list of planning policies relevant to the consideration of the application can be found in Appendix 3.

6 Consultations and Representations

- 6.1 38 neighbouring properties were consulted by letter dated 25.11.24 with the consultation period expiring on 16.12.24. A site notice was advertised on 02.12.24 (expired on 24.12.24) and a press notice advertised on 11.12.24 (expired on 04.01.25). Two representations against the application were received and are detailed in Table 1 below.
- 6.2 Internal and external consultations were also sent out and a summary of the comments received are noted below in Table 2 of this Committee Report.
- 6.3 Representations received in response to public consultation are summarised in Table 1 (below). Consultee responses received are summarised in Table 2 (below). Full copies of the responses have also separately been made available to Members.

Table 1: Summary of Representations Received

Representations	Summary of Issues Raised	Planning Officer Response
Resident / Public Representations (2 received - Against)	Opposes the financial spending of the Council, and requests the money is spent on management of the Lido.	The expenditure of Hillingdon Council is not a material planning consideration.

	Opposes the potential increase in visitors due to better facilities.	The principle of the application is discussed at paragraph 7.6 and traffic generation impacts at paragraph 7.24 of this report.
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Table 2: Summary of Consultee Responses

Consultee and Summary of Comments	Planning Officer Response
<p>Council’s Access Officer:</p> <p>This application for replacement toilet facilities has been reviewed with reference to London Plan policy D5. The proposed design features 4 accessible toilet facilities and a Changing Places cubicle. No accessibility concerns are raised. Conclusion: acceptable.</p>	<p>The Access Officer is supportive of the application.</p>
<p>Council’s Highways Officer:</p> <p>There are no highway objections to this proposal subject to inclusion of a condition on any approval requiring a full and detailed Construction Logistics Plan to be submitted to and approved in writing by the Local Planning Authority prior to the start of development.</p>	<p>The recommended condition has been adopted by the planning officer and included in this recommendation for approval.</p>
<p>Council’s Urban Design Officer:</p> <p>The Urban Design Officer reviewed the application and initially raised concerns with the originally proposed exaggerated 45-degree roof pitch. They also noted concerns with the proposed zinc roofing, visibility of utilities, the proposed access ground levels and lack of detailed landscaping information.</p> <p>Additional information was subsequently provided by the applicant in response to the officer’s comments including revised drawings which reduced the roof pitch to 40-degrees.</p> <p>Subject to the inclusion of appropriate conditions, the urban design officer is supportive of the application.</p>	<p>The comments from the Urban Design Officer have been considered.</p> <p>The planning officer has worked with the Urban Design Officer to draft the recommended conditions to ensure acceptable design outcomes.</p>

<p>Council's Trees Officer:</p> <p>Identified concern regarding the proximity of works to one mature tree on the Woody Bay site.</p> <p>Additional information was provided by the applicant in response to the Tree Officer's comments. Subsequently the officer is supportive of the application subject to inclusion of tree protection conditions.</p>	<p>The recommended condition has been adopted by the planning officer in this recommendation for approval.</p>
<p>Council's Contaminated Land Officer:</p> <p>There are no Contaminated Land objections to this proposal subject to inclusion of a land contamination informative on the application for how to manage unexpected land contamination.</p>	<p>The recommended informative has been adopted as a condition within this recommendation for approval.</p>
<p>Greater London Archaeological Advisory Service (GLAAS):</p> <p>On the basis of the information provided, we do not consider that it is necessary for this application to be notified to Historic England's Greater London Archaeological Advisory Service.</p>	<p>GLAAS were consulted based on the site location within an archaeological priority area. They identified no reasons for concern.</p>
<p>Natural England:</p> <p>No objection subject to appropriate mitigation being secured via recommended planning condition.</p>	<p>Natural England were consulted based on the sites' proximity to Ruislip Woods Site of Special Scientific Interest. The recommended condition has been adopted by the planning officer in this recommendation for approval.</p>
<p>Environment Agency:</p> <p>No comment on the application.</p>	<p>The Environment Agency were consulted based on the sites' proximity to</p>

	the Ruislip Lido. They reviewed the application and considered it not necessary to comment.
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7 Planning Assessment

Principle of Development

- 7.1 The principle for the public toilet uses on the site is established through the existing use. However, as the site is located on Green Belt Land, the principle of erecting the new buildings on the site must be tested.
- 7.2 Policy DMEI 4: Development in the Green Belt or on Metropolitan Open Land of the Hillingdon Local Plan: Part 2 (2020) states that *‘inappropriate development in Metropolitan Open Land will not be permitted unless there are very special circumstances’* and *‘redevelopment would only be permitted where it would not have a greater impact on the openness of the Metropolitan Open Land, and the purposes of including land within it, than the existing development.’*
- 7.3 Policy EM2: Green Belt, Metropolitan Open Land and Green Chains of the Hillingdon Local Plan: Part 1 (2012) states that *‘Any proposals for development in Green Belt and Metropolitan Open Land will be assessed against national and London Plan policies, including the very special circumstances test.’*
- 7.4 Policy G2 of the London Plan (2021) states that Green Belt should be protected from inappropriate development, but subject to national planning policy tests, the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported.
- 7.5 Paragraph 154 of the National Planning Policy Framework (2024) states that development is inappropriate unless it is for *‘the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.’*
- 7.6 The proposed toilet blocks would support the outdoor recreational uses of Ruislip Lido and therefore is not ‘inappropriate development.’ The new facilities would address existing capacity issues by expanding their capacity. The toilets would provide step-free access and a complete array of toilet facilities for men, women, mobility-impaired and families. This would ensure that the Ruislip Lido is more accessible and amenable for all Londoners. Any additional visitors to the site created by the provision of new toilet facilities (induced demand) would be

extremely low and would not unduly harm the amenity of the area or of neighbouring properties.

- 7.7 It is also considered that the openness of the Green Belt Land would be maintained. The two proposed toilet facilities would replace existing toilet blocks and would be in the same location as the existing buildings. They would also be single storey and compact. This would also ensure the openness of the Green Belt is preserved by locating the buildings in existing built-up areas and replacing existing buildings.
- 7.8 Overall, the principle of the proposed development is accepted and complies with the National Planning Policy Framework (2024), Policy G2 of the London Plan (2021), Policy EM2 of the Hillingdon Local Plan: Part One (2012) and Policy DMEI 4 of the Hillingdon Local Plan: Part Two (2020).

Design / Impact on the Character and Appearance of the Area

- 7.9 Chapter 13 of the National Planning Policy Framework (2024) seeks to prevent inappropriate development and ensure the openness of the land is not harmed.
- 7.10 Policy D3 of the London Plan (2021) requires development proposals to be of high quality and to enhance the local context by delivering buildings and spaces that positively respond to local distinctiveness. Policy G2 requires that the Green Belt be protected from inappropriate development.
- 7.11 Policy BE1 of the Hillingdon Local Plan Part 1 – Strategic Policies (2012), and policies DMHB 11 and DMHB 12 of the Hillingdon Local Plan Part 2 – Development Management Policies (2020) in summary seek to secure a high quality of design that enhances and contributes to the area in terms of form, scale and materials, is appropriate to the identity and context of the townscape and would improve the quality of the public realm and respect local character. These aims are also supported by Chapter 12 of the NPPF (2024).
- 7.12 The two proposed replacement toilet blocks would be located on the footprints of the existing blocks and would be slightly larger than the existing toilets to achieve the necessary capacity for enhanced provision. They would be clad with brick and have standing seam zinc roofing. Glass block windows and aluminium rooflights would provide daylight to the buildings. The entry doors would be constructed out of steel and PPC aluminium panels would provide unlit signage on the walls. The proposed colours of the materials have not been confirmed. Therefore, a condition of consent has been included requiring provision of a materials palette (with adequate supporting information including colours) be submitted to the LPA for review and approval prior to works commencing.
- 7.13 During the assessment of the application, revised drawings were submitted in response to LPA feedback reducing the pitch of the roofs from 45-degrees to 40-degrees, and by consequence also reducing the maximum heights of the buildings. These amendments addressed concerns of excessive height and

Hillingdon Planning Committee – 13th February 2025

PART 1 – Members, Public & Press

resultant poor visual outcomes. The amended 40-degree roof pitches would be less prominent while still maintaining the functionality of the higher pitched roofs with regards to debris clearance and internal height clearances for water tanks.

- 7.14 The Council's Urban Designer has reviewed the revised scheme and is supportive of the proposal. The Urban Designer initially raised concerns regarding the exaggerated roof form, quality/appropriateness of materials, screening of utilities and necessity of ramps for access. The applicant responded to these comments with amended plans and/or additional information such that the Urban Designer could support the proposal subject to the application of appropriate conditions. These conditions relate to securing provision of a landscaping scheme and a materials palette. The conditions recommended by the planning officer in this report were reviewed by the Urban Designer and confirmed that their concerns have been adequately addressed.
- 7.15 Overall, the design of the scheme is of a high-quality and supported. The proposed location of the replacement toilet blocks on top of the existing footprints (proposed for demolition) would minimise visual impacts on the surrounding Green Belt land, maintaining the openness of the area. The proposed buildings are compact in form, single-storey and rectangular, and efficiently provide a much greater array and quality of facilities for public use than the existing buildings. By re-utilising the existing building locations, changes to the overall environment are minimised and the sprawl of built form on the site is avoided. As such, it is considered that the openness of the Green Belt land would be maintained by the new buildings.
- 7.16 The limited scale, single-storey height and location of the proposed replacement buildings would ensure they sit comfortably in the surrounding environment. The reduced roof pitch has addressed the initial exaggerated form of the roofs and simultaneously reduced the building heights. While the 40-degree pitch is still high, it would aid in clearing debris from the roofs as well as enabling minimum floor to ceiling heights to achieve in-roof water tanks. Overall, the scale of the proposed replacement public toilet buildings considered acceptable.
- 7.17 The proposed materials are high-quality and durable, and necessary for the functional nature of the building and exposed environment location. It is considered the materials, whilst modern and not in keeping with adjacent older buildings, would clearly depict the purpose of the buildings as functional/public toilets and are therefore considered to be acceptable.
- 7.18 Both buildings would be provided with step-free access, ensuring the toilets are accessible for all forms of mobility, and the toilets provide male, female, accessible and family toilets and changing rooms ensuring all the needs of the local community and Lido visitors are met.
- 7.19 New landscaping areas are proposed around the buildings. However, details of the landscaping, including planting specification and hard materials have not been provided at this stage. As such, it is recommended that landscaping details and maintenance is secured by way of condition on the decision notice.

Hillingdon Planning Committee – 13th February 2025

PART 1 – Members, Public & Press

- 7.20 Overall, the proposed replacement toilet blocks would sit comfortably on the Green Belt land and would maintain the openness, appearance, and character of the area. The proposed scale has been minimised, and the proposed replacement buildings would be located on top of the existing building footprints, minimising any encroachment. The proposed materials would ensure an acceptable external finish that is visually attractive and fit-for-purpose.
- 7.21 It is considered that the proposed development would comply with the overarching aims of the NPPF (2024), Policies D3 and G2 of the London Plan (2021), Policy BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (2012), and Policies DMHB 11 and DMHB 12 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020).

Neighbouring Residential Amenity

- 7.22 Due to the remote location of the sites within the public Ruislip Lido reserve and significant separation distances from residences, there are no neighbouring residential sites whose amenities may be adversely affected by the proposal.

Highways and Parking

- 7.23 The application has been reviewed by the Council's Highways Officer who does not raise any objections to the proposal subject to the adoption of a condition requiring the submission of a Construction Logistics Plan for approval prior to commencement. This condition has been included in Appendix 1.
- 7.24 The proposal does not include any change to existing parking provision or access arrangements. It is considered that any increased traffic generation created by the provision of new toilet facilities would be negligible in highways terms and would not notably change traffic movements.

Accessibility

- 7.25 Each toilet block would provide level, step-free access to accessible toilets, as well as a Changing Places cubicle (larger accessible toilets for severely disabled people with equipment such as hoists, privacy screens, space for caregivers etc). As such, the application is considered acceptable with regards to accessibility. The application has been reviewed by the Access Officer who does not raise any concerns.

Trees and Landscaping

- 7.26 Policy DMHB 14: Trees and Landscaping of the Hillingdon Local Plan Part Two (2020) states that all developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit, and will be required to provide tree surveys and protection plans where proposals might affect

existing trees. It also states that development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity.

- 7.27 Policy G7 of the London Plan (2021) states that London's urban forest and woodlands should be protected and maintained, and development proposals should ensure that, wherever possible, existing trees of value are retained.
- 7.28 The site is not subject to specific tree protections. However the larger site is a public reserve and on Green Belt land, and there are multiple mature trees of high value located within proximity of the proposed development sites. The sites are also adjacent to Ruislip Woods.
- 7.29 A Tree Survey and Arboriculture Report has been submitted with the proposal for both the Woody Bay and Willow Lawn sites. The Council's Trees Officer reviewed the submitted information and initially identified concern over the proximity of works to a mature Oak tree near the Woody Bay site.
- 7.30 The applicant responded to the Trees Officer's concerns with additional information confirming that an arboriculturalist would be engaged in the detailed design of the building foundations to mitigate any potential impacts on this identified tree.
- 7.31 The Trees Officer confirmed that subject to inclusion of appropriate conditions, which the Tree Officer has reviewed and approved of, they are supportive of the application. These conditions are included in Appendix 1.
- 7.32 Given the proximity to Ruislip Woods, Natural England were also consulted on the application. They confirmed they have no objection to the proposal subject to securing appropriate mitigation (in the form of a condition requiring submission of a Construction Environmental Management Plan) to ensure the construction works do not adversely harm the Ruislip Woods. Such a condition has been included in this recommendation for approval in Appendix 1.
- 7.33 As such, subject to inclusion of the recommended conditions, it is considered that the proposed development is acceptable and would comply with Policy G7 of the London Plan (2021) and Policy DMHB 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020).

Biodiversity

- 7.34 Policy G6 of the London Plan (2021) states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
- 7.35 The applicant has submitted a Preliminary Ecological Appraisal for the sites supported by a site walkover survey and a desk-top study. The sites are located

Hillingdon Planning Committee – 13th February 2025

PART 1 – Members, Public & Press

in proximity to woodland and open water habitats and therefore the report recommends provision of a Construction Environment Management Plan to be secured by way of condition. The report also recommends a provision of a Construction Lighting Plan to be secured by way of condition to mitigate any impacts from construction lighting.

- 7.36 The report identifies that the sites do not support any protected species directly, including not providing any opportunities for nesting birds or roosting bats, and due to their modified hardstand nature, does not provide suitable foraging habitat for bats or other species.
- 7.37 The report identifies there could be potential harm to foraging bats during construction. However, the report notes there is unlikely to be any severance impacts and any other impacts can be appropriately mitigated to avoid harm to bats.
- 7.38 Natural England were consulted on the application. They confirmed they have no objection to the proposal, including no concern over harm to bats, subject to securing appropriate mitigation (in the form of a condition requiring provision of a Construction Environmental Management Plan) to ensure the construction works do not adversely harm the local biodiversity.
- 7.39 As such, with the application of appropriate conditions, any impacts to local biodiversity are mitigated in accordance with Policy G6 of the London Plan (2021).

Biodiversity Net Gain

- 7.40 Under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021), developers must deliver a Biodiversity Net Gain (BNG) of at least 10%. This means a development will result in more or better-quality natural habitat than there was before development.
- 7.41 The applicant has submitted a Biodiversity Net Gain Assessment in support of the application. The report confirms various enhancement recommendations that could be feasibly accommodated on the sites to achieve BNG compliance with a proposed strategy that would achieve a 21.12% net gain.
- 7.42 However, in the absence of a detailed landscaping scheme containing the recommended enhancement measures, conditions are included requiring the provision of a detailed landscaping scheme as well as an updated biodiversity net gain assessment to the Council for review and approval prior to commencement of works. A condition requiring the submission of a habitat management plan has also been included.

Sustainability

- 7.43 Policy DMEI 2 of the Hillingdon Local Plan (2020) requires all developments to make the fullest contribution to minimising carbon dioxide emissions in accordance with the London Plan targets.
- 7.44 The applicant has submitted an energy and sustainability report in support of the application. The report confirms various sustainability measures would be implemented in the design, including implementation of passive and active enhancements, water reuse, low carbon materials and water reuse.
- 7.45 The proposal would therefore be compliant with Policy DMEI 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020).

Land Contamination

- 7.46 Policy DMEI 12 of the Local Plan (2020) states that for sites which are identified as being at potential risk of land contamination, a contaminated land report detailing the history of contamination on site, relevant survey work and findings should be submitted in support of the application.
- 7.47 The sites are identified as being located on potentially contaminated land. The Council's Contaminated Land Officer has reviewed the application and has no objection subject to inclusion of an appropriate informative requiring a watching brief and consultation with the Council should unexpected contamination be discovered. This has been included as a condition in Appendix 1.
- 7.48 The Environment Agency was also consulted and had no objection to the proposal.
- 7.49 The applicant has also submitted a geotechnical desk top study of the sites which has not identified the sites as being subject to potential land contamination but nevertheless has recommended undertaking further on-site investigations to confirm.
- 7.50 Therefore, to mitigate the potential risk from contaminated land, a condition of consent has been included in this recommendation, requiring mitigation should unexpected contamination be discovered during the works. Subject to such a condition, the proposal is considered compliant with Policy DMEI 12 of the Local Plan (2020).

Archaeological Priority Area

- 7.51 Policy DMBH 7 of the Hillingdon Local Plan: Part Two (2020) states that the Council, as advised by the Greater London Archaeological Advisory Service, will ensure that sites of archaeological interest within, or where appropriate, outside, designated areas are not disturbed.

- 7.52 As the site is located within an archaeological priority area, Historic England's Greater London Archaeological Advisory Service were consulted. They confirmed they did not need to be consulted, nor did they hold any objection to the application.
- 7.53 On this basis, the application is considered not to have an impact on archaeological assets and would be in accordance with Policy DMBH 7 of the Hillingdon Local Plan: Part Two (2020).

Fire Safety

- 7.54 Policy D12 of the London Plan states that all developments must achieve the highest standards of fire safety.
- 7.55 The sites are situated within two areas of open space and the buildings are non-habitable. As the proposed toilet blocks are single storey, accessible and non-habitable, the LPA are satisfied it would not lead to any fire safety and access/escape route concerns.

8 Other Matters

Human Rights

- 8.1 The development has been assessed against the provisions of the Human Rights Act, and in particular Article 1 of the First Protocol and Article 8 of the Act itself. This Act gives further effect to the rights included in the European Convention on Human Rights. In arriving at this recommendation, due regard has been given to the applicant's reasonable development rights and expectations which have been balanced and weighed against the wider community interests, as expressed through third party interests / the Development Plan and Central Government Guidance.

Equality

- 8.2 Due consideration has been given to Section 149 of the Equality Act with regard to the Public Sector Equality Duty in the assessment of this planning application. No adverse equality impacts are considered to arise from the proposal. The proposal would provide accessible public toilet facilities.

Local Finance Considerations and CIL

- 8.3 The proposal is for greater than 100sqm of gross internal floor area and is therefore CIL liable. Demolition of any applicable existing floor area may be factored into the chargeable area.

9 Conclusion / Planning Balance

- 9.1 The proposed development would have an acceptable impact on the character and appearance of the area, the openness of the Green Belt and would not give rise to any undue harm to the surrounding environment.
- 9.2 The principle of the replacement of the two toilet facilities on the Green Belt land is supported, as they would support the established outdoor recreational uses at Ruislip Lido and would preserve the openness and visual amenity of the Green Belt land.
- 9.3 Any potential ecological impacts from the proposal can be acceptably mitigated through the imposition of recommended conditions.
- 9.4 The proposal is considered to comply with the Development Plan, London Plan and the National Planning Policy Framework (2024) and no material considerations indicate that a contrary decision should be taken. Consequently, the application is recommended for approval subject to the conditions set out in Appendix 1.

10 Background Papers

- 10.1 Relevant published policies and documents taken into account in respect of this application are set out in the report. Documents associated with the application (except exempt or confidential information) are available on the [Council's website here](#), by entering the planning application number at the top of this report and using the search facility. Planning applications are also available to inspect electronically at the Civic Centre, High Street, Uxbridge, UB8 1UW upon appointment, by contacting Planning Services at planning@hillingdon.gov.uk.

APPENDICES

Planning Application

78998/APP/2024/2281

Appendix 1: Recommended Conditions and Informatives

Conditions

1. COM3 **Time Limit**

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. COM4 **Accordance with Approved Plans**

The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers:

1326-P1000-C
1326-P0999-C
1326-P1002-B
1326-P1051-B
1326-P2001-C
1326-P2050-B
1326-P1052-B
1326-P1003-B

and shall thereafter be retained/maintained for as long as the development remains in existence.

REASON

To ensure the development complies with the provisions Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2021).

3. COM7 **Materials (details)**

No development shall take place until details of all materials and external surfaces have been submitted to and approved in writing by the Local Planning Authority. The proposed materials and colours must integrate with the natural surrounding environment to the satisfaction of the Local Planning Authority. Thereafter the development shall be constructed in accordance with the approved details and be retained as such for the lifetime of the development.

Details should include information relating to make, product/type, colour and photographs/images.

REASON:

To ensure that the development presents a satisfactory appearance and preserves the visual quality of the Ruislip Woods Nature Conservation Site in accordance with Policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

4. COM9 Landscaping Scheme (details)

Prior to any works on site above damp proof course level, a detailed landscape scheme must be submitted to and approved in writing by the Local Planning Authority. The landscaping scheme must provide materials and design of a high-quality to the satisfaction of the Local Planning Authority and must be in accordance with the recommendations laid out in section 1.2 PEA Enhancement Recommendations of the submitted Biodiversity Net Gain Assessment (prepared by Harper Environmental, Issue 01, dated 26 September 2024). The scheme shall include:

1. Details of Soft Landscaping

- 1.a 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 Design and Appearance

- 2.a Refuse storage
- 2.b External utilities and associated screening
- 2.c Walkway, stair and ramp railings
- 2.d Means of enclosure/boundary treatments
- 2.e Hard surfacing materials
- 2.f External lighting
- 2.g Other structures (such as play equipment and furniture)

3. Details of Habitat Enhancement

- 3.a Four invertebrate hotels provided within south-facing areas.
- 3. b Two bat boxes
- 3.c Bird boxes including 3-5 sparrow boxes/terraces, 3-5 starling boxes and at least 2 swift bricks.

4. Details of Landscape Maintenance

- 4.a Landscape Maintenance Schedule for a minimum period of 5 years.
- 4.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 by being of a high-quality design and appearance, and provide adequate facilities in compliance with policies DMHB 11, DMHB 14 and DMEI 1 of the Hillingdon Local Plan Part 2 (2020) and Policies D4 and D8 of the London Plan (2021).

5. COM10 Trees 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 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 DMHB 14 of the Hillingdon Local Plan Part 2 (2020) and Policy G7 of the London Plan (2021), and to comply with Section 197 of the Town and Country Planning Act 1990.

6. COM8 Tree Protection (Woody Bay - details)

No excavation or construction work at the Woody Bay site shall take place until an updated arboriculture report reflecting the final detailed design of the construction of the Woody Bay toilet block has 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 excavation or construction work at the Woody Bay site 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.

3. Where the arboricultural method statement recommends that the tree protection measures for a site will be monitored and supervised by an arboricultural consultant at key stages of the development, records of the site inspections / meetings shall be submitted to the Local Planning Authority.

REASON:

The proposed works encroach into the Root Protection Area of a mature Oak tree (identified as T14 in the approved arboriculture report). An updated arboriculture report reflecting the final detailed design of the works is required to ensure the Oak tree, as well as other surrounding trees and vegetation, can and will be retained on site and not damaged during construction work, to ensure that the development conforms with policy DMHB 14 of the Hillingdon Local Plan Part 2 (2020) and Policy G7 of the London Plan (2021).

7. COM8 Tree Protection (Willow Lawn)

Development at the Willow Lawn site shall be carried out in accordance with the approved arboriculture report Arboricultural Report and Tree Condition Survey for Proposed Works at 'Willow Lawn' dated November 2024.

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 DMHB 14 of the Hillingdon Local Plan Part 2 (2020) and Policy G7 of the London Plan (2021).

8. NONSC Construction Logistics Plan (details)

Prior to commencement of development, a full and detailed Construction Logistics Plan shall be submitted to and approved in writing by the Local Planning Authority. This should be in accordance with Transport for London's Construction Logistic Planning Guidance and detail the management of construction traffic, including vehicle types, frequency of visits, expected daily time frames, use of an onsite banksman, on-site loading/unloading arrangements and parking of site operative vehicles. The construction works shall be carried out in strict accordance with the approved plan.

REASON

To ensure that the construction works include appropriate efficiency and sustainability measures so as not to compromise the safe and efficient operation of the local highway network and minimizes emissions, in accordance with Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and Policies SI 1, T3 and T7 of the London Plan (March 2021)

9. NONSC Construction Environmental Management Plan (details)

Prior to development commencing, the applicant shall submit a Construction Environmental Management Plan to the Local Planning Authority for its approval. The plan shall detail measures to address the issues identified in Table 5.1 of the approved Preliminary Ecological Appraisal prepared by Harper Environmental dated 06 September 2024.

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

REASON

To ensure that impacts are avoided upon Ruislip Woods SSSI in accordance with Policy G7 of the London Plan (2021) and Policy DMHB 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020).

10. NONSC Construction Lighting Plan (details)

No external lighting may be used during demolition and construction of the facilities unless a lighting scheme design has been submitted to the Local Planning Authority for review and approval prior to demolition and construction. The lighting scheme must be designed by a suitably qualified lighting consultant and submitted with evidence that the proposal has been reviewed and verified by a qualified ecologist.

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

REASON:

To avoid adverse harm to bats and other wildlife in the area in accordance with Policy DMEI 7 of the Hillingdon Local Plan: Part Two (2020).

11. NONSC Biodiversity Net Gain Assessment (details)

Prior to any works on site above damp proof course level, an updated Biodiversity Net Gain Assessment verifying the detailed landscape scheme required under Condition 4 of this approval shall be submitted to and approved in writing by the Local Planning Authority. This assessment shall confirm that the proposal would achieve at least 10 percent biodiversity net gain. The development shall be implemented fully in accordance with these approved details.

REASON:

To ensure the development achieves 10% biodiversity net gain in accordance with statutory requirements.

12. NONSC BNG Management Plan (details)

No development shall take place on any part of the site until a written 30-year Habitat Management Plan (HMP) for the site has been submitted to and approved in writing by the Local Planning Authority.

The approved HMP shall be strictly adhered to, and development shall commence and operate in accordance with it.

The HMP should, as a minimum, include:

- a) Description and evaluation of the features to be managed.
- b) Aims, objectives and targets for management.
- c) Description of the management operations necessary to achieving aims and objectives.
- d) Prescriptions for management actions.
- e) Preparation of a works schedule, including an annual works schedule.
- f) Details of the monitoring needed to measure the effectiveness of management.
- g) Details of the timetable for each element of the monitoring programme and;
- h) Details of the persons responsible for the implementation and monitoring.
- i) Report to the Council routinely regarding the state of the Biodiversity Net Gain requirements for development in years 1 (post-completion), 3, 5, 10, 20, and 30, with biodiversity reconciliation calculations at each stage.

REASON

To ensure the development delivers a Biodiversity Net Gain within the borough and secures the protection and effective management of the remaining habitat on site in accordance with Policy 15 of the National Planning Policy Framework, Policy G6 of The London Plan, and Policy DMEI 7 (Biodiversity Protection and Enhancement) of Hillingdon Council's Local Plan Part 2 Development Management Policies.

13. NONSC Un-expected Land Contamination

In the event that contamination is found at any time when carrying out the approved

development that was not previously identified it must be reported in writing immediately to the Local Planning Authority.

An investigation and risk assessment must be undertaken using the proposed Watching Brief and Discovery Strategy prepared, and where remediation is necessary a remediation scheme must be prepared subject to the approval in writing of the Local Planning Authority.

Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority.

REASON:

You are advised this development is on a potential former contaminated land identified as Historical Water as well as adjacent to other potential former contaminated land identified as Nursery/Orchard. The above advice is therefore provided on the grounds of Health and Safety of the workers on site and to ensure the appropriate restoration of the site is done should there be any contamination identified during the development where there is a need, for ground work once such works are complete to minimise risk to the occupants of the site.

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. I19 Sewerage Connections, Water Pollution etc.

You should contact Thames Water Utilities and the Council's Building Control Service regarding any proposed connection to a public sewer or any other possible impact that the development could have on local foul or surface water sewers, including building over a public sewer. Contact: - The Waste Water Business Manager, Thames Water Utilities plc, Kew Business Centre, Kew Bridge Road, Brentford, Middlesex, TW8 0EE.
Building Control Service - 3N/01, Civic Centre, High Street, Uxbridge, UB8 1UW (tel. 01895 250804 / 805 / 808).

3. I47 Damage to Verge - For Council Roads:

The Council will recover from the applicant the cost of highway and footway repairs, including damage to grass verges.

Care should be taken during the building works hereby approved to ensure no damage occurs to the verge or footpaths during construction. Vehicles delivering materials to this development shall not override or cause damage to the public footway. Any damage will require to be made good to the satisfaction of the Council and at the applicant's expense.

For further information and advice contact - Highways Maintenance Operations, Central Depot - Block K, Harlington Road Depot, 128 Harlington Road, Hillingdon, Middlesex, UB3 3EU (Tel: 01895 277524).

For Private Roads: Care should be taken during the building works hereby approved to ensure no damage occurs to the verge of footpaths on private roads during construction. Vehicles delivering materials to this development shall not override or cause damage to a private road and where possible alternative routes should be taken to avoid private roads. The applicant may be required to make good any damage caused.

4. 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).

5. I70 LBH worked applicant in a positive & proactive (Granting)

In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies from Local Plan Part

1, Local Plan Part 2, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably.

153 **Compulsory Informative (2)**

The decision to GRANT planning permission has been taken having regard to the policies and proposals in the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan (2021) and national guidance.

DMEI 12	Development of Land Affected by Contamination
DMEI 2	Reducing Carbon Emissions
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
LPP D12	(2021) Fire safety
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D4	(2021) Delivering good design
LPP D5	(2021) Inclusive design
LPP G2	(2021) London's Green Belt
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP SI1	(2021) Improving air quality
LPP T3	(2021) Transport capacity, connectivity and safeguarding
LPP T7	(2021) Deliveries, servicing and construction
NPPF12 -24	NPPF12 2024 - Achieving well-designed places
NPPF13 -24	NPPF13 2024 - Protecting Green Belt land

Appendix 2: Relevant Planning History

1117/APP/2008/2243 Woody Bay Station, Ruislip Lido Railway Reservoir Road, Ruislip
Single storey storage shed.

Decision: 05-11-2008 Approved

1117/APP/2012/1785 Ruislip Lido Railway Station Reservoir Road Ruislip
Erection of a single storey toilet block and a single storey ticket office building (involving the demolition of existing ticket office building).

Decision: 12-03-2013 Approved

1117/APP/2017/2188 Miniature Railway, Ruislip Lido Reservoir Road Ruislip
Demolition of existing Ruislip Railway Society workshop and provision of replacement workshop building, landscaping and associated works

Decision: 13-07-2017 Approved

Appendix 3: List of Relevant Planning Policies

The following Local Plan Policies are considered relevant to the application:-

Part 1 Policies:

- PT1.BE1 (2012) Built Environment
- PT1.EM2 (2012) Green Belt, Metropolitan Open Land and Green Chains

Part 2 Policies:

- DMEI 2 Reducing Carbon Emissions
- DMEI 4 Development on the Green Belt or Metropolitan Open Land
- DMEI 12 Development of Land Affected by Contamination
- DMHB 11 Design of New Development
- DMHB 12 Streets and Public Realm
- DMHB 14 Trees and Landscaping
- DMHB 7 Archaeological Priority Areas and archaeological Priority Zones
- DMT 1 Managing Transport Impacts
- DMT 2 Highways Impacts
- LPP D3 (2021) Optimising site capacity through the design-led approach
- LPP D4 (2021) Delivering good design
- LPP D5 (2021) Inclusive design
- LPP D12 (2021) Fire safety
- LPP G2 (2021) London's Green Belt
- LPP G6 (2021) Biodiversity and access to nature
- LPP G7 (2021) Trees and woodlands
- LPP SI1 (2021) Improving air quality

LPP T3	(2021) Transport capacity, connectivity and safeguarding
LPP T7	(2021) Deliveries, servicing and construction
NPPF12 -24	NPPF12 2024 - Achieving well-designed places
NPPF13 -24	NPPF13 2024 - Protecting Green Belt land