

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

Your Ref 2382/APP/2023/2906

Our Ref CRTR-PLAN-2025-45682

Monday 15 December 2025

Dear Michael Briginshaw,

Proposal: AMENDED INFORMATION: Redevelopment of the site to create the Hillingdon Watersports Facility and Activity Centre including demolition of existing Broadwater Lake Sailing Club (BSC) clubhouse at the north of the lake and erection of a building including changing facilities, meeting rooms, storage, Workshop and seasonal worker accommodation (sui generis), activity shelters; installation of pontoons and slipways; boat shed; equipment storage huts; boat parking and racking areas; camping area; outdoor activity areas; ecological enhancement throughout the site; new pedestrian routes through the peninsula; landscaping including new woodland, dense vegetation screens and boundary treatment; access road; localised dredging and land reclamation; relocation of existing sailing area and creation of floating reedbeds within the lake; coach drop off and turning area; vehicle parking; cycle parking; and associated works. (Re-consultation following submission of amended plans and documents)

Location: Broadwater Lake, Moorhall Road, Harefield

Waterway: Grand Union Canal

Thank you for your consultation.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.

The main issues relevant to the Trust as statutory consultee on this application are:

- a. Bridge crossing
- b. Canal boundary and towpath access.
- c. The impact on water quality
- d. Accessibility

The amendments to the application do not appear to significantly impact on the matters of interest to the Trust and the comments in our previous response dated 6th December 2023 therefore remain largely relevant. Our comments below should be read in conjunction with our earlier response.

Canal & River Trust Spatial Planning Team

E: planning@canalrivertrust.org.uk **W:** canalrivertrust.org.uk **T:** 0303 040 4040

Based on the amended information available our substantive response (as required by the Town & Country Planning (Development Management Procedure) (England) Order 2015 (as amended)) remains is to advise that suitably worded conditions are necessary to address these matters. Our advice and comments follow:

Bridge crossing

The amended details state that the proposals will involve some changes to the fabric of Bridge No. 179. The indication is that these works will likely entail a sensitive repair and restoration programme to retain all salvageable historic fabric and replace any that is beyond reasonable repair with appropriate materials, though it is noted that the precise nature of these works is still to be determined.

The Construction Logistics Plan (CLP) says that utilities will be connected from the site to the east underneath the Grand Union canal via horizontal Directional drilling. The CLP outlines measures that should be taken to minimise impact to the canal and its users and also states that waste transportation via barge along the Grand Union Canal is proposed, though details will be confirmed on appointment of a principal contractor.

As per our previous comments, the applicant/developer should provide further clarity on the proposals for the bridge, and the applicant/developer will need to engage further with the Trust on their proposals for the bridge and any utility /service crossings. Any proposals would need to ensure sufficient clearance from the water and the towpath to the underside of the bridge is retained so that access and navigation of the waterway is not adversely affected, in accordance with the Trust's Code of Practice.

The Trust also generally recommend that any proposals for a bridge crossing should include pedestrian and cycle access to/from the canal towpath via a suitable graded access to improve walking and cycling connectivity with the towpath. It is noted that the current intention is not to open the bridge for pedestrian/cycle traffic due to landowner restrictions on the eastern side of the canal. However, further consideration of the implications of this will be necessary once further detail on the proposed scheme for the crossing itself is submitted for consideration.

Any new crossing or changes to the visual appearance of the structure will need to be reviewed to ensure the design is appropriate to the existing character and appearance of the waterway corridor. A Heritage Assessment of the existing bridge would need to be undertaken and utilised to inform the proposals.

The visual impacts and effectiveness of measures that would be necessary to restrict pedestrian/cycle access onto and across the bridge deck will also need to be fully considered. It is likely that in the absence of properly designed measures to restrict access, informal access will be created by those wishing to access the bridge crossing and canal corridor. This could lead to adverse impacts on structural integrity, compromise the safety of waterway users and adversely impact on visual amenity. Whether works would preclude the creation of a link in the future also needs to be considered.

The Trust, as landowner, will require detailed design /drawings and construction methodology for works to the bridge and any proposed utility crossing above or underneath the canal as part of our own approval process. The applicant is also advised to review the Canal & River Trust "*Code of Practice for Works affecting the Canal & River Trust*" as all works will need to adhere to the Code.

Furthermore, detail on the future ownership, maintenance and technical approval authority for any bridge crossing will be required and it should be noted that the Trust will not take on the future ownership or maintenance of any bridge crossing.

The proposals for the existing bridge and proposed utilities crossings could be addressed by condition, and the Trust wish to be consulted on any information submitted in relation to crossings of the canal. However, we strongly recommend the applicant/developer contact the Trust to discuss this further prior to any formal

Canal & River Trust Spatial Planning Team

E: planning@canalrivertrust.org.uk **W:** canalrivertrust.org.uk **T:** 0303 040 4040

submission to address any practical issues around development works on, over, under or adjacent to Trust land/water space.

We currently run a free pre-application advice service and encourage applicants to engage with us as early as possible on any proposed or amended canal crossings. Further information can be found via our website: <https://canalrivertrust.org.uk/specialist-teams/planning-and-design/our-statutory-consultee-role/what-wereinterested-in/pre-application-advice>

Canal boundary and towpath access.

The proposed works would still appear to largely be set back substantially from the canal corridor. The impact of the proposed buildings would therefore remain limited, though as per our previous comments this will depend on the retention of existing canalside vegetation, particularly at the southern end of the site where the main concentration of buildings would be located. There should be strengthening of the existing vegetation and potential new planting wherever possible, though particularly within the peninsula area.

The plans have been amended in relation to the proposed boundary treatment and now show a mix of boundary treatments proposed along the canal boundary, including retention of the existing vegetation, 1.5m high hazel hurdle fence combined with dry hedging and 1.2m high dry hedging with bramble/ivy planting alongside. South of Bridge 179 the boundary treatment changes to 1.8m high V-mesh security fencing though this seems to follow the line of the existing track within the site and would therefore be set back from the canal boundary behind existing vegetation. Existing gates to the canal bridge and 3m wide access gate to the towpath are also shown to be retained which would allow new managed site access to the canal.

Any fencing should be sited to avoid tree root protection zones and existing planting to ensure the existing character and biodiversity of the waterway corridor is retained. It would be beneficial to ensure there is suitable vegetation to the outside of any fencing to screen it from the canal's outward perspective, particularly when considering its length. The final details of the proposed landscaping and boundary treatment could be addressed by condition, and the Trust wish to be consulted on this detail when available.

The impact on biodiversity and water quality

Potential contamination of the waterway and ground water from wind blow, seepage or spillage at the site should be avoided and details of pollution prevention measures and response plan should be provided. The details of any further intrusive site investigations should be submitted for consideration, and it should be ensured that any drainage strategy considers and is informed by the results and recommendations of the site investigations, with surface water during construction and operation of the site avoiding or incorporating appropriate mitigation measures if passing through any contamination hotspots.

Works should also be carried out at appropriate times to avoid adverse impacts to nesting birds / bats etc. This could be addressed by the imposition of a condition requiring the submission of a Construction and Environmental Management Plan. As detailed above the Construction Logistics Plan will need to be updated/amended in respect of the bridge crossing works.

Accessibility

Further to our previous comments, to support active and recreational access to the lakes along the canal from Uxbridge, Denham and South Harefield the proposals could support the Trust's Moorhall Road to Black Jacks Lock towpath project (1.8km). These works have not recently been costed though they are likely to be in the region of £775k to provide a sealed surface. Whilst some funding has already been secured there is a current shortfall of £504k. Alternatively, the applicant/developer may wish to undertake the works themselves with the Trust providing support on work specification and planning.

Canal & River Trust Spatial Planning Team

E: planning@canalrivertrust.org.uk **W:** canalrivertrust.org.uk **T:** 0303 040 4040

The Trust have been discussing the opportunities to improve the towpath between Uxbridge and Harefield with Sophie Wilmott, Transport & Community Projects Team Leader at Hillingdon Council and we would be happy to discuss this further to determine whether this application may be able to support the improvements outlined above and the level of any contribution the Council consider reasonable.

For clarity, we recommend that conditions relating to the following matters relevant to the Trust should be imposed on any approval:

- Full details of the proposals for the existing bridge crossing and any new structures or cables crossing under or over the Grand Union canal. This should include a heritage assessment, bat roost assessment, detail of any temporary or permanent lighting, detailed construction methodology and future maintenance and management regimes and responsibilities.
- Details of boundary treatment to the Grand Union canal boundary including fencing, soft landscaping and future maintenance and management regimes and responsibilities.
- Construction and Environmental Management Plan

Should planning permission be granted we also request that the following informatives are appended to the decision notice:

1) There is some land /water space within the red line site area which is within the ownership of the Canal & River Trust. Although there is an existing lease of the Trust's airspace for the bridge, any works or changes to the bridge and cable crossings may require further commercial agreements/licences from the Trust. Please contact Bernadette McNicholas, Estates Surveyor (Bernadette.mcnicholas@canalrivertrust.org.uk) to discuss these matters further and any commercial agreements/licences in respect of access points from the site to the towpath.

2) The applicant/developer is advised to contact the Works Engineering Team on 0303 040 4040 in order to ensure that any necessary consents are obtained and that the works comply with the Canal & River Trust "Code of Practice for Works affecting the Canal & River Trust". For us to monitor effectively our role as a statutory consultee, please send me a copy of the decision notice and the requirements of any planning obligation.

Comments as Landowner

There is some land /water space within the red line site area which is within the ownership of the Trust. However, we advise that no Notice appears to have been served on us by the Applicant. Although there is an existing lease of the Trust's airspace for the bridge, any works or changes to the bridge and cable crossings may require further commercial agreements/licences from the Trust. Please contact Bernadette McNicholas, Estates Surveyor to discuss these matters, contact details as per the informative above.

For us to monitor effectively our role as a statutory consultee, please send me a copy of the decision notice and the requirements of any planning obligation.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

Anne Denby MRTPI
Area Planner

Anne.Denby@canalrivertrust.org.uk

Canal & River Trust Spatial Planning Team

E: planning@canalrivertrust.org.uk **W:** canalrivertrust.org.uk **T:** 0303 040 4040