

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

Your Ref 79689/APP/2025/2438

Our Ref CRTR-PLAN-2025-45429

Wednesday 12 November 2025

Dear Haydon Richardson,

Proposal: Demolition of existing buildings and structures and redevelopment of the site to provide modern employment units (for flexible use across classes E(g)(iii), B2, B8 with ancillary office space) alongside car parking, service yards, Landscaping, ancillary structures and all other associated works.

Location: Orbital Industrial Estate, Horton Road, Yiewsley, West Drayton

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. The impact on the structural integrity of the canal due to the proximity of the works.
- b. Biodiversity Net Gain (BNG)
- c. Impact on the character and appearance of the waterway corridor
- d. Impact on the biodiversity of the waterway corridor
- e. Drainage

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

The impact on the structural integrity of the canal due to the proximity of the works.

With any development close to the waterway there is the potential for adverse impacts on the infrastructure of the canal in terms of stability, drainage, pollution etc. As you may be aware, land stability is a material planning consideration and is referred to in paragraphs 187, 196 & 197 of the NPPF, as well as being the subject of more detailed discussion in the current National Planning Practice Guidance.

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We consider therefore that this advice and guidance clearly identifies that the planning system has a role to play in minimising the risk and effects of land stability on property, infrastructure, and the public.

Therefore, due to the proximity of the proposed works to the canal, any proposals should include details on the proposed demolition and construction methodology, including details of all earthmoving, excavations and the design and construction of any boundary treatment should also be provided in order that the extent of the risk of such works to the stability of the canal can be properly quantified and assessed. This matter could be addressed by the submission of a Demolition and Construction Risk Assessment and Method Statement which could be secured by condition. The Trust wish to be consulted on any details when available.

Any works would also need to comply with the Canal & River Trust “Code of Practice for Works affecting the Canal & River Trust”. Further details can be found via our website: <https://canalrivertrust.org.uk/business-andtrade/undertaking-works-on-our-property-and-our-code-of-practice>.

Biodiversity Net Gain (BNG)

It is the Trust’s understanding that the Mandatory Biodiversity Net Gain requirement would apply to this planning application. The Statutory Biodiversity Metric User Guide requires that if the site boundary of a proposed development includes land within 10m of a canal the adjacent lengths of watercourse should be included within the watercourse baseline assessment in the Metric.

Unless an exemption applies, the developer will need to deliver a minimum 10% net gain in watercourse biodiversity units. Development may also affect other habitat types on land owned by the Trust, including, but not limited to, grassland, woodland, scrubland, and hedgerows. A River Condition Assessment would therefore also need to be undertaken to assess the condition of the watercourse and the impact of the proposed development upon it.

However, considering that the canal is located within 10m of the canal the BNG assessment submitted appears to have been undertaken incorrectly. The Preliminary Ecological Appraisal (PEA) also seems to have been undertaken using incorrect methodology for a BNG assessment. In addition, having reviewed the PEA, the assessment was undertaken using the incorrect Phase 1 habitat survey methodology which does not provide the standardised condition assessments for the habitats present on site. The correct method of assessment is the UK Habitat Classification methodology which is the industry standard and this therefore brings the BNG assessment validity into question. The applicant/developer should provide further clarity on this and an updated survey using the correct methodology undertaken along with a river condition assessment.

No works to habitat on Trust land should take place without the Trust’s prior consent. Ecologists working on behalf of developers should obtain, and comply with, consents from the Trust to undertake any necessary habitat condition assessments and ecological surveys on our land, consistent with our Code of Practice.

The Trust may be able to assist in meeting Biodiversity Net Gain requirements by providing off-site biodiversity units. This would be subject to operational, management and commercial considerations. Should the applicant / developer wish to discuss any opportunities to secure biodiversity units on Trust land please contact bngenquiries@canalrivertrust.org.uk.

Impact on the character and appearance of the waterway corridor

The proposed building would be set back from the canal boundary allowing a visual break in built form along the canal, and the neighbouring built form and the existing screening provided by the towpath vegetation would limit the impact of the development from the canal’s outward perspective.

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It should be ensured that all works, particularly the demolition of the existing buildings at the south of the site, minimise any impacts on the existing trees along the towpath. Best practice methodologies should be undertaken and every measure taken to ensure the ongoing vitality of these trees.

Some additional planting is proposed along the southern site boundary, however, any further opportunities for additional planting to provide a suitable 'screen' of planting within the applicant's ownership would be beneficial. The proposed tree and native shrub species along the southern boundary are appropriate, though it would be good to see the ornamental Hypericum and rosaemum replaced with an ornamental species on the RHS Plants for Pollinators list. In addition, measures should be included to ensure that roots from any trees planted at the close to the canal boundary and towpath do not adversely impact on the structural integrity of the canal infrastructure.

As above there are concerns with the BNG/PEA assessments, and this may have implications for the landscape proposals once these assessments have been reviewed. The final details on soft and hard landscaping could however be required by condition.

Impact on the biodiversity of the waterway corridor

The waterways have a rich biodiversity, with many areas benefiting from SSSI, SAC, SLINC or CWS designations. Developments can have an adverse impact on the ecology of the waterways.

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 should be provided. This should include a demolition management plan (including asbestos management plan); construction surface waters management; pollution prevent and response plan, construction noise management, waste management, sustainability plan. Works should also be carried out at appropriate times to avoid adverse impacts to nesting birds / bats etc. These matters could be addressed by the imposition of a condition requiring the submission of a Construction and Environmental Management Plan.

The Trust advise that waterside lighting affects how the waterway corridor is perceived, particularly when viewed from the water, the towpath and neighbouring land, for example waterside lighting can lead to unnecessary glare and light pollution if it is not carefully designed. Any external lighting should be angled downwards, and light directed into the site, and it should not provide flood lighting to the canal corridor to show consideration for bats and other nocturnal species. The final details of any external lighting proposed could be addressed by condition.

Drainage

The drainage methods of new developments can have significant impacts on the structural integrity, water quality and the biodiversity of waterways. It is important to ensure that no contaminants enter the canal from foul or surface water drainage and full drainage details should be submitted and agreed.

As per the submission further intrusive site contamination investigations should be undertaken (including points with potential hot spots). The site should be remediated appropriately and the drainage proposals informed by the results of the further site investigations with drainage avoiding or incorporating appropriate mitigation measures to prevent contamination of ground or surface waters.

The submission indicates that no drainage is currently proposed to the canal though it should be noted that any surface water discharge to the waterway, including any utilising existing outfalls, would require prior consent from the Canal & River Trust. As the Trust is not a land drainage authority, such discharges are not granted as of right where they are granted, they will usually be subject to completion of a commercial agreement.

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Conditions

Should planning permission be granted we request that conditions, as per the below, are imposed on any approval:

- 1) **Demolition and Construction Risk Assessment and Method Statement** – *No development shall take place until a Method Statement detailing all proposed earthmoving, demolition and construction works has first been submitted to and agreed in writing by the Local Planning Authority. The development shall thereafter only be carried out in accordance with the agreed Method Statement and the mitigations measures identified therein.*
Reason: In the interests of minimising the risk of any adverse impacts upon the structural integrity of the adjacent Grand Union canal or its users in accordance with the guidance contained in Paragraphs 187, 196 & 197 of the NPPF.
- 2) **Tree protection measures** – *Council's own wording*
- 3) **Landscaping** – *Council's own wording*
- 4) **Construction and Environmental Management Plan** – *Council's own wording*
- 5) **External lighting details** – *Council's own wording.*
- 6) **Contamination Investigations** – *Council's own wording*
- 7) **Drainage details** – *Council's own wording*

In addition, should planning permission be granted we also request that the following **informatives are** appended to the decision notice:

1. The applicant/developer is advised to contact the Canal and River Trust's Infrastructure Works Engineering Team on 0303 040 4040 or email Enquiries.TPWSouth@canalrivertrust.org.uk 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".

2. The applicant is advised that any surface water discharge to the waterway will require prior consent from the Canal & River Trust. As the Trust is not a land drainage authority, such discharges are not granted as of right where they are granted, they will usually be subject to completion of a commercial agreement. Please contact Chris Lee, Utilities Surveyor to discuss this further (utilitiesenquiry@canalrivertrust.org.uk)

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

<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

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