

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

Case Officer: Michael Briginshaw	2382/APP/2023/2906
---	---------------------------

Date Application Valid:	14.11.2023	Statutory / Agreed Determination Deadline:	30.04.2026
Application Type:	Full	Ward:	Ickenham & South Harefield

Applicant: **Hillingdon Council Capital Programme Works Service**
 Site Address: **Broadwater Lake, Moorhall Road, Harefield**
 Proposal (Summarised): **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.**

Summary of Recommendation: **GRANT planning permission subject to section 106 legal agreement and conditions**

Reason Reported to Committee: **Required under Part 1 of the Planning Scheme of Delegation (Major application recommended for approval)**



Summary of Recommendation:

GRANT planning permission subject to the completion of a satisfactory section 106 legal agreement to secure the heads of terms set out below, and subject to the conditions as set out in Appendix 1.

Mayor of London Stage 2 Referral & S106 Legal Agreement Heads of Terms

It is recommended that delegated powers be given to the Director of Planning and Sustainable Growth to grant planning permission subject to the following:

A) That the application be referred to the Mayor under Article 5 of the Town and Country Planning (Mayor of London) Order 2008.

B) That the application be referred to the Secretary of State under Article 12 of the Town and Country Planning (Consultation) (England) Direction 2024.

C) That the Council enter into a legal agreement with the Applicant under Section 106 of the Town and Country Planning Act 1990 (as amended) or any other legislation to secure the following:

- i. Community Centre Delivery Plan: Planning obligation to prevent any development (including demolition) at the site until the Hillingdon Outdoor Activity Centre (HOAC) and Broadwater Sailing Club have entered into a lease for long term occupation of the development.
- ii. Healthy Streets/Active Travel Zone Contribution: A financial contribution of £177,800 for healthy streets and active travel zone measures.
- iii. Carbon Offset Contribution: A financial contribution of £42,821. The obligation shall include monitoring measures (be seen).
- iv. Section 278 Agreement: A Section 278 agreement to implement the highways works on Moorhall Road.
- v. Employment Strategy and Training Scheme: A financial contribution of £66,736 towards the delivery of an Employment Strategy and Training Scheme, secured in accordance with the Council's Planning Obligations SPD.
- vi. Project Management & Monitoring Fee: A Project Management and Monitoring Fee, equalling 5% of the total financial contributions to be paid under this agreement.

D) That in respect of the application for planning permission, the Applicant meets the Council's reasonable costs in preparation of the Section 106 Agreement and any abortive work as a result of the agreement not being completed.

E) That officers be authorised to negotiate and agree the detailed terms of the proposed agreement and conditions of approval and agree any changes requested by the Greater London Authority.

F) That, if the Legal Agreement has not been finalised within 6 months (or such other time frame as may be agreed by the Director of Planning and Sustainable Growth), delegated authority be given to the Director of Planning and Sustainable Growth to refuse planning permission for the following reason:

'The Applicant has failed to mitigate the impacts posed by the proposed development (in respect of the Carbon Emissions, Highways Safety, and Employment). The scheme therefore conflicts with Policies DMCI 7 of the Hillingdon Local Plan: Part 2 (2020); the adopted Planning Obligations Supplementary Planning Document (2014); Policy DF1 of the London Plan (2021); and paragraphs 56-58 of the National Planning Policy Framework (2024).'

G) That if the application is approved, that the permission is subject to the Conditions as set out in Appendix 1.

1 Executive Summary

- 1.1 The former Hillingdon Outdoor Activity Centre (HOAC) site located on land owned by Hillingdon Council, at Dews Lane in South Harefield, sits on the direct route of the High Speed Two (HS2) Phase One train line connecting London and Birmingham. As the new line passes directly through the HOAC site, it has been subject to a Compulsory Purchase Order and has been closed since October 2020. Construction of the Colne Valley Viaduct required permanent safety buffer zones and ongoing HS2 access and maintenance rights through the site, while the viaduct itself makes the lake unsuitable for sailing, meaning that even after construction, the land and waterbody cannot function as an outdoor activity centre. Following a considered site selection process, Broadwater Lake was identified as the location for a replacement facility.
- 1.2 At the national level, Broadwater Lake was notified as part of the Mid Colne Valley Site of Special Scientific Interest (SSSI) under the Wildlife and Countryside Act (1981) in 1985. The site forms part of a functional flood plain and is designated as part of Flood Zones 2 and 3 by the Environment Agency (EA). At the local level, the site is designated under the Hillingdon Local Plan as Green Belt land.
- 1.3 The planning application proposes redevelopment of the site to create the Hillingdon Watersports Facility and Activity Centre, providing a replacement for the former Hillingdon Outdoor Activity Centre (HOAC), previously owned by Hillingdon Council and operated by the Colne Valley Youth & Community Association to support outdoor and environmental education for young people, particularly those who are disadvantaged or disabled. The scheme includes demolition of the existing Broadwater Lake Sailing Club clubhouse, construction

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

of new operational, safety and camp facilities with accessible amenities, activity and support spaces and seasonal accommodation, installation of pontoons and slipways, camping and outdoor activity areas, new access routes, parking and coach facilities, and the relocation of the sailing club to the south of the lake. It also delivers landscaping, woodland planting, ecological enhancements including floating reedbeds, safeguarded ecological land, and localised dredging and land reclamation.

- 1.4 Since the planning application was first submitted in October 2023, statutory consultees have provided comments, and the scheme has been redesigned in response. The development has been reduced in size, and all technical documents have been updated. The site boundary remains substantially the same, and the overall principle of development is consistent with the earlier scheme.
- 1.5 Hillingdon Council (the Applicant) undertook a comprehensive review of 71 lakes within a 20-kilometre radius of the former HOAC site to identify a deliverable location for the replacement outdoor activity and water sports facility. This assessment applied criteria, including lake size and depth, land availability, accessibility for schools and vulnerable users, environmental constraints, site security, and financial viability. Five sites were shortlisted, including Broadwater Lake, Ruislip Lido, Bury Lake, Aldenham Reservoir and Denham Quarry. The evaluation concluded that Broadwater Lake is the only site capable of accommodating the full range of required land and water-based activities, providing suitable sailing conditions, offering safe and secure access, and being deliverable within the £26.5 million HS2 funding agreement. All other sites were discounted due to constraints such as inadequate lake depth, public access that could not be secured, insufficient land, environmental designations, poor access, incompatible existing uses, or costs far exceeding the approved budget. The Alternative Sites Assessment concludes that no other reasonable or available alternative site exists, and that Broadwater Lake is the only viable and appropriate location for the proposed facility. Officers agree with the overall conclusion and can therefore confirm that the harm posed to the SSSI cannot be avoided entirely, although it is proposed to be avoided to a degree, mitigated and compensated for.
- 1.6 Alongside the National Planning Policy Framework (NPPF) (2024), local and regional planning policies require planning decisions to apply the biodiversity mitigation hierarchy, refuse development where significant harm cannot be avoided, mitigated or compensated, and generally resist development affecting Sites of Special Scientific Interest (SSSIs) unless the benefits clearly outweigh both site-specific and wider network impacts, while also supporting schemes that conserve or enhance biodiversity. Although the proposal lies within the Mid Colne Valley SSSI and would result in some harm, it has been designed to be ecologically and environmentally sensitive, following the mitigation hierarchy in full. Harm is avoided where possible by locating development on areas of existing hardstanding and concentrating activity within the less sensitive south-east of the site, alongside a significant expansion of the quiet-water refuge from approximately 3.42 ha to approximately 14.72 ha secured through buoyed no-sail limits. Harm is further mitigated through targeted access control and screening,

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

directional low-spill lighting, seasonal island vegetation management, and localised dredging limited to achieving safe sailing depths. Where impacts cannot be fully avoided or mitigated, compensation and enhancement measures are secured through re-profiling Island 02 to create two sheltered bays, removal of Island 07 to open the Eastern Channel, knotweed eradication on Island 06, wet-woodland infill along disused tracks, native grassland, scrub and tree planting (including reptile and invertebrate earth mounds), a new wildlife pond and sensory garden, tern rafts, bird and duck boxes, and underwater willow planters to define refuge edges while preserving sightlines. These measures are secured through conditions requiring a Mitigation, Enhancement & Management Plan (Condition 15), an Operational Management and Activities Plan (Condition 41), and a Monitoring, Reporting & Adaptive Management Plan (Condition 55), ensuring ongoing management and adaptive monitoring for the lifetime of the development in agreement with statutory stakeholders. Taken together, the scheme delivers a net ecological benefit, improves the long-term management of the SSSI, enhances inclusive access to nature, and provides significant social, educational and community benefits which clearly outweigh the identified harms, in accordance with the Development Plan.

- 1.7 It is important to compare the impacts of the proposed scheme to the “Do Nothing” scenario. If no development is undertaken, the former HOAC site will remain permanently closed with no viable replacement facility. This would result in the continued loss of outdoor activity provision for schools, Special educational needs (SEN) groups, PRUs, community clubs and families. The Broadwater Lake Site, part of the Mid Colne Valley SSSI, would also remain in an “unfavourable condition” (as confirmed by Natural England) without any management plan, meaning no biodiversity enhancements, habitat restoration, or ecological mitigation would occur, and existing issues such as invasive species and degraded habitat would persist. In this scenario, no improvements to accessibility, safety, landscape quality, flood resilience or community infrastructure would be delivered, and the significant social, educational and environmental benefits associated with the proposed development would not be realised.
- 1.8 The site is designated as Green Belt land and would not constitute Grey Belt. By virtue of the associated planning policy definitions, the development would constitute inappropriate development within the Green Belt. Accordingly, Very Special Circumstances are required and will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. As explained within the main body of the Committee Report, the development is considered to have significant social, community and public benefits, including economic and environmental benefits. More specifically, the proposal reinstates a much-valued facility used by schools, colleges, SEN groups, scouts, guides, cadets, families, Broadwater Sailing Club, and local emergency services. It provides year-round, accessible land and water-based activities, tailored support for disabled users, and dedicated provision for Pupil Referral Units (PRU) students and vulnerable young people. Evidence from Natural England, Defra and educational bodies demonstrates significant mental-health, physical-health, behavioural and educational benefits derived from outdoor learning and nature-based activity, all

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

of which the new facility is designed to maximise. It is therefore concluded that the harm to the Green Belt, and all other harms posed, are clearly outweighed by the benefits and as such, Very Special Circumstances are deemed to exist.

- 1.9 In terms of townscape and landscape visual impact, it is assessed and considered that the proposal would not significantly alter the skyline as perceived from surrounding areas. From a visual perspective, views of the development are contained, in the main, within the site itself. The design and elevational treatments are considered to be of sufficient high quality which soften its impact on the setting of the SSSI and Green Belt. Subject to securing further details by condition, the proposal is supported from a design perspective.
- 1.10 Planning obligations are proposed to be secured to ensure that the development is acceptable. Significantly, it is proposed that no development, including demolition, at the site shall occur until HOAC and Broadwater Sailing Club have entered a long term lease for occupation of the development. This is proposed to ensure that this specific site is, without doubt, required to replace the former HOAC facility, as set out within the Alternative Sites Assessment. It also ensures that significant community and social benefits are realised because of the development, and that existing community groups are not disadvantaged as a result of the development, namely HOAC and Broadwater Sailing Club.
- 1.11 Planning obligations are also proposed to secure net zero-carbon compliance, encourage more sustainable forms of transport through delivery of active travel zone measures and highways works, and deliver an employment and construction training scheme.
- 1.12 Subject to the planning conditions and obligations recommended, the proposed development is considered acceptable in principle and with respect to design, heritage, residential amenity, environmental issues, transport, and sustainability.
- 1.13 Due regard has been given to the comments received as part of the consultation process and it is concluded that the proposal complies with the Development Plan. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. For the reasons outlined above and within the main body of the report, this application is considered to comply with the Development Plan and is recommended for approval, subject to securing the planning conditions set out in Appendix 1, securing the necessary planning obligations via an appropriate legal agreement, Stage 2 referral to the Greater London Authority and referral to the Secretary of State.

2 The Site and Locality

- 2.1 The former Hillingdon Outdoor Activity Centre (HOAC) site is located at Dews Lane in South Harefield, on a 22.2 ha site owned by Hillingdon Council. HOAC's location at Dews Lane, sits on the direct route of the High Speed Two (HS2) Phase One train line connecting London and Birmingham. As the new line passes directly

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

through the HOAC site, the land has been subject to a Compulsory Purchase Order and has been closed since October 2020. To date HS2 have permitted a decommissioned HOAC to remain at Dews Lane.

- 2.2 The HS2 route crosses the Mid Colne Valley Site of Special Scientific Interest (SSSI) to the west of the lake, on a viaduct bisecting the Herts and Middlesex Wildlife Trust's managed Broadwater Lake Nature Reserve.



Figure 1: View of Broadwater Lake from the Old Orchard Public House

- 2.3 Broadwater Lake (as shown in Figure 1 above) is the subject of this application and comprises a large area of land and water. The site forms part of the Colne Valley Regional Park, the Mid Colne Valley SSSI, the Denham Quarry and Pits Nature Conservation Site of Metropolitan Grade Importance (SINC) and Colne Valley Archaeological Priority Zone. The site also forms part of designated Green Belt land, a functional flood plain and Flood Zones 2 and 3.
- 2.4 There are a small number of residential properties located along the existing access to the site, which connects to Moorhall Road to the south. Further afield, neighbouring residents are located in South Harefield to the east (40m away at the closest point) and Denham Garden Village to the West (300m away at the closest point). The south-east corner of the site is made up of secondary woodland, beyond which is the Widewater Lock Conservation Area which encompasses part of the Grand Union Canal, Moorhall Road, the Widewater Place Business Park, Harefield Marina and the River Garden Public House. Only a small stretch of Moorhall Road forms part of the red line site boundary and would

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

form part of the Conservation Area designation. The Grand Union Canal runs north/south to the east of the site and is designated as part of a SINC. The Public Transport Accessibility Level (PTAL) is very low and sits between 0 and 1b.

- 2.5 The site is located on the western boundary of Hillingdon Borough, adjoining Buckinghamshire district to the west and Three Rivers District Council district to the north.



Figure 2: Location Plan (application site edged red)

- 2.6 More specifically, the site subject to the application measures circa 80 hectares in area and comprises a waterbody and two main land parcels, these being Broadwater Lake, the peninsula to the south of the lake and land to the north of

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

the lake occupied by Broadwater Sailing Club, located in South Harefield within the north of Hillingdon borough. Whilst these locations are where the main elements of development would be located, two secondary land parcels also form part of the site and are to be safeguarded as ecological sites, located off Moorhall Road to the south and Broadwater Lane to the east. Please refer to Figure 2 above which shows the site location plan and defines the application boundary.

3 Proposal



Figure 3: Operations Zone Entrance - Visualisation (please note – a larger version of the visualisation can be found on document ref. 1329-HAV-Z1-ZZ-DR-A-S2-2311 P01)

3.1 This planning application seeks permission for redevelopment of the site to create the Hillingdon Watersports Facility and Activity Centre. This includes:

- Demolition of the existing Broadwater Lake Sailing Club clubhouse.
- Construction of new buildings, including:
 - Operations Zone building
 - Changing rooms, WCs, showers, and accessible provisions
 - Accessible camping and support room
 - Ancillary reception space, office space and training rooms
 - Observation deck
 - Seasonal worker accommodation (sui generis)

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

- Safety Zone building
 - Workshop and repairs area
 - Safety equipment store and boat store
 - Secure yard
 - Energy centre and plant room
 - Transformer and switch rooms
 - Camp zone building
 - Changing rooms, including accessible provisions
 - Food preparation area
 - Activity shelter
 - Two Angler's Huts (one to the north and one to the south of the lake)
 - Equipment and hand wash facilities
 - Tea point
 - Accessible WC
 - Store
- Installation of pontoons and slipways.
 - Provision of camping areas and outdoor activity zones.
 - Ecological enhancements across the site, including north of the lake in place of the Broadwater Sailing Club and including floating reedbeds.
 - Safeguarding of land for ecology:
 - Land off Moorhall Road: Safeguarded ecological site measuring circa 1ha
 - Land off Broadwater Lane: Safeguarded ecological site measuring circa 0.8ha
 - New pedestrian routes through the peninsula.
 - Landscaping: new woodland, dense vegetation screening, and boundary treatments.
 - Construction of an access road.
 - Localised dredging and land reclamation.
 - Relocation of the existing Broadwater Sailing Club from north of the lake to the south.
 - Coach drop-off and turning area.
 - Vehicle parking and cycle parking.

3.2 Please see Figure 4 overleaf which shows the overall site plan for the proposals. This shows the concentration of physical development on existing hardstanding within the southern peninsula and removal of the Broadwater Sailing Club

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

buildings from the north of the lake. Within the lake, Island 02 is proposed to be re-profiled to create two sheltered bays, Island 07 is proposed to be removed to open the Eastern Channel, and knotweed is to be eradicated on Island 06. Proposals also include wet-woodland infill on disused tracks, native grassland/scrub/tree planting (including reptile / invertebrate earth mounds), a new wildlife pond and sensory garden, tern rafts, bird/duck boxes, and underwater willow planters to define refuge edges while preserving sightlines.



Figure 4: Proposed Ecological Mitigation and Enhancement Plan (please note – a larger version of the plan can be found in the Committee Plan Pack)

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

Proposed Activities and User Groups:

- 3.3 As a replacement facility is required, the proposed development will support the following water based activities, all of which formed part of the operation at the former HOAC facility:
- Maintaining existing Broadwater Sailing Club uses;
 - Dinghy sailing;
 - Kayaking/canoeing;
 - Two dragon boats;
 - Stand up Paddleboarding;
 - Raft building and use;
 - Windsurfing; and
 - Angling (this is also an existing use).
- 3.4 The proposed development will also support the following land based activities, all of which formed part of the operation of the former HOAC facility:
- Indoor fencing (in the Main Building);
 - Activity shelter for outdoor team building activities;
 - Bird watching;
 - Camping; tents, sheltered camping (for disabled children / adults, underneath shelter on hard surface near to toilet facilities) and indoor camping (for disabled children / adults inside Main Building);
 - Orchard and foraging;
 - Pond dipping;
 - Artificial above-ground caving system; and
 - Environment training and education including bird watching.
- 3.5 The proposed development will provide land and water based activities and overnight accommodation facilities for a diverse range of user groups, but it will predominately serve children and young people. The proposed user groups are set out in Table 1 below.

Table 1. Proposed User Groups

User Group	Description of Needs
Schools	School groups, including children aged six and above with a wide range of physical, mental, social and educational needs, will use the facility for day visits and overnight stays. Because many groups are first-time visitors and may vary in size, age, ability, gender and religion, the site must be simple to navigate, while smaller PRU and SEN groups may use the facility more regularly.
Guides and Scouts	Guide and scout groups will use the facility, often in large numbers of up to 120 children, plus 12 adults, at one time. They may visit the facility for the day or for overnight stays. Their gender and age split may be mixed or one-sided.

Cadets	Sea cadets include children aged 10 and above and army and air cadets include children aged 12 and above.
Children, young people and adults with additional needs	Children, young people and adults with additional needs, including those with autism, multiple learning disabilities and / or physical impairments will use the facility. These users need to be able to use all the same facilities as the peers with no disability.
Families	Families will require frequent access and use of the facility throughout the year. Children may be accompanied by their parents or guardians who could have other children with them of different ages. Families will need to have the ability to change together, and consideration should be given to how the changing rooms are accessible and comfortable for different needs.
Ecologists	The proposed developments should have the option to operate as a Field Study Centre as part of the Field Studies Council national offering. This will allow those training as ecologists to study together.
Permanent Staff	Staff will be hired, so the facility should be an exemplar workplace in line with the employment law under the Equality Act 2010.
Seasonal live-in staff / those in training	Seasonal, overnight staff will form a large part of the operational staff at the proposed development during peak times. These positions are often taken up by young people training to become professional activity instructors. Staff will require basic accommodation, access to food preparation, private living space and their own shower facilities. Some of these users may be aged 16, where safeguarding will have to be considered.
Broadwater Sailing Club (BSC) Members	Formed in 1972, BSC is an inland sailing club which supports those who enjoy sailing, from young people learning the basics in Optimist and Topper boats, to experienced sailors. The club has approximately 240 family and junior members who use the lake for club sailing on a Wednesday and Sunday (in the evening in the summer months and the mornings in the winter months). Sailing regattas are held on Sundays throughout the year and an additional six are held on various Saturdays.
Anglers	Anglers are identified as a planned and managed user group with a defined need for controlled access to Broadwater Lake to undertake recreational fishing within a regulated framework. Angling is a permitted water-based activity and provides for it in specific, limited locations along the north-eastern and eastern

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

	shores of the lake and within the lagoon, reflecting the need for shoreline access while protecting sensitive habitats and bird refuge areas. Anglers' use is intended to be subject to clear rules, a defined code of conduct, and a dedicated angling biosecurity regime, ensuring that fishing activity is accommodated in a way that is compatible with statutory SSSI duties, lake management objectives and the overall operational management of the site.
--	---

Proposed Operation:

- 3.6 The proposed Hillingdon Watersports Facility and Activity Centre is centred around the Operations Zone building and Safety Zone building, supported by an ancillary activity shelter and angler huts. The Operations Zone building functions as the operational hub of the site and accommodates reception, administration, changing facilities, equipment storage, training and education spaces, welfare facilities, and limited seasonal accommodation for staff only. The sleeping accommodation is strictly for seasonal staff during the months of April to September each year and is integral to ensuring effective site supervision, safeguarding, and early-morning operational readiness. It is not visitor accommodation and is not available for hire or general overnight stays.
- 3.7 The site operates on a clearly defined and restricted basis. Land and water-based activities are limited to the period 1st April to 31st September, with activities taking place between 10:00 and 15:00, seven days a week. Staff may be present on site between 08:30 and 17:30 to allow for preparation, supervision and site management. Overnight use is tightly controlled. Camping is permitted only on Friday and Saturday nights and is limited to supervised youth and educational use, with defined maximum numbers and designated camping areas. The accommodation within the Operations Zone building for disabled users (indoor or sheltered camping) is ancillary to the functional operation of the centre and is not used independently of supervised activity programmes.
- 3.8 Operational management is governed by a detailed Operational Management Plan proposed to be secured by planning condition. This includes a robust code of conduct, defined activity zones, strict controls over noise, lighting, access to the lake and shoreline, safeguarding protocols, flood risk procedures, biosecurity measures, and pollution prevention. All users must sign in and out at the Operations Zone building, access is controlled by staff, and unauthorised activities, including amplified music, fireworks, drones, or unsupervised access, are expressly prohibited. The Operational Management Plan also establishes an adaptive management framework, overseen by a Site Manager and an advisory group involving statutory bodies, enabling operational practices to be reviewed and adjusted in response to monitoring or any emerging issues.
- 3.9 Importantly, the Operational Management Plan does not permit the unrestricted hiring out of facilities for events. Any future use of the buildings for group activities must remain consistent with the defined operational parameters, activity types,

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

hours of use and environmental protections. The buildings are intended to support structured outdoor education, water sports, and community activity only. Any departure from this, including commercial events, late-night use, or intensified hire, is not permitted and would require separate planning permission.

Acceptance of Amendments:

- 3.10 Legal advice was sought regarding whether the proposed changes to the planning application can be treated as amendments or whether it would require a new planning application. The key legal test, drawn from R (British Telecommunications plc) v Gloucester City Council [2002] 2 P&CR 33 and confirmed in R (Holborn Studios) v Hackney LBC [2018] PTSR 997, is whether the changes are so substantial that the development is no longer, in substance, what was originally applied for. This is a matter of planning judgment for the Local Planning Authority, subject to review only on grounds of unreasonableness. Case law demonstrates that even significant amendments can lawfully be accepted, provided this substantive threshold is not crossed and procedural fairness is maintained. If amendments are pursued, adequate re-consultation will be required to protect third-party rights, but this is not in itself a barrier. As explained within the main body of the report, and the application is materially similar in substance, and the proposed changes are not inherently impermissible, meaning that amendments were accepted and re-consulted on. Please see Section 6 of the report which sets out relevant detail on the consultation process.
- 3.11 The document titled ‘Table Comparison of Original and Revised Development’ helpfully summarises the differences between the original 2023 application submission and the amended 2025 application submission. In summary, the revised scheme is significantly reduced in scale and intensity, with reduction in land reclamation, dredging, building footprint, parking, boat storage, and water activity areas.
- 3.12 Specifically, the revised Description of Development removes explicit reference to HOAC and BSC occupying the new development in order to follow planning application best practice, rather than to preclude those user groups from occupying the development. The proposed activity range has been consolidated and outdoor structures and land reclamation have been substantially reduced. The two iterations of the scheme are compared by their built development features and operational characteristics in Tables 2 and 3 below.

Table 2. Comparison of Built Development by Scheme Iteration

Built Development	Original Scheme (2023)	Revised Scheme (2025)
Total Floorspace (GIA)	4,274 m ²	3,474 m ²
Total Floorspace (GEA)	4,644 m ²	3,844 m ²
Max Building Height	10.98 m ridge	10.5 m ridge
Activity Shelters	7	1
Angler’s Hut	1	2
Dredging	47,356 m ²	7,094 m ²

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

Land Reclamation	16,114 m ²	2,884 m ²
Sailing Area	33.3 ha	29.46 ha
Water Activity Zones	Shared multi-use zone	Eastern channel only
Undisturbed Water	3.42 ha	14.72 ha
Peninsula Extension	16,151 m ²	2,892 m ²
Island Removal	2 islands (2,187 m ²)	3 islands (3,608 m ²)
New Islands Created	8 islands (4,308 m ²)	0 islands
Net Increase in Open Water	0	716 m ²
Floating Reedbeds	0	800 m ²
Beach Launch Area	324 m ²	382 m ²
Car Parking Total	83	50
Standard Parking	62	36
Blue Badge Car	5	6
EV Active	4	6
EV Passive	4	0
Blue Badge Minibus	3	2
Brown Badge	3	0
Coach Spaces	2	0
Cycle Parking	42	42
Boat Parking	425	260

Table 3. Comparison of Operation by Scheme Iteration

Operation	Original Scheme (2023)	Revised Scheme (2025)
Land-Based Activities	Fencing, archery, pedal karting, caving, big swing, high/low ropes	No pedal karting; new indoor/sheltered camping; revised activity mix
Water-Based Activities	Sailing, kayaking, canoeing, rowing, stand up paddleboarding, dragon boating, raft building, windsurfing	Activities relocated to eastern channel, including dinghy sailing, kayaking / canoeing, stand-up paddleboarding, dragon boating, raft building, windsurfing, and angling
Maximum No. Users	200 children + 20 adults	120 children + 12 adults
On-Water Users	Up to 100 children	72 children + 8 adults
Sailing Use – Peak	12 children + 2 adults	12 children + 2 adults
Angling	Children only in late July/August	Children only in late July/August
Land-Based User Assumptions	Up to 100 indoor	Peak 60 children + 6 adults
Ecology/Education Users	Not specified	Included within total users
Camping	25–50 children	25–50 children (Fri–Sun)
Staffing	8 permanent, 14 seasonal, 10 volunteers	6 permanent, 14 seasonal, 10 volunteers

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

Opening Months	Apr–Sept (HOAC); BSC all year	Apr–Sept (HOAC); BSC all year
Hours of Operation	Mon–Fri 08:30–17:30; no weekends	10:00–15:00 daily; shorter weekday hours but now includes weekends

3.13 In summary, the revised 2025 scheme is smaller, more constrained, and more environmentally moderated than the 2023 proposal. The proposals have been amended to reduce ecological effects, operational intensity, and physical impact on Broadwater Lake. Key changes include reductions to:

- Physical footprint
- Dredging and lake modification
- User capacity
- Water activity areas
- Land-based structures and intensity
- Parking and boat storage

3.14 Furthermore, there are increased provision of:

- Undisturbed water area
- Environmental mitigation (e.g., floating reedbeds)
- Accessible / inclusive camping options

3.15 Plans are shown overleaf to demonstrate the concentration and distribution of activity and disturbance across the southern peninsula and wider waterbody.

3.17 Please see Figure 6 below for the water disturbance plan. Activity is concentrated in the less sensitive south-east of the site and the quiet-water refuge is expanded from c. 3.42 ha to c. 14.72 ha with buoyed no-sail limits.

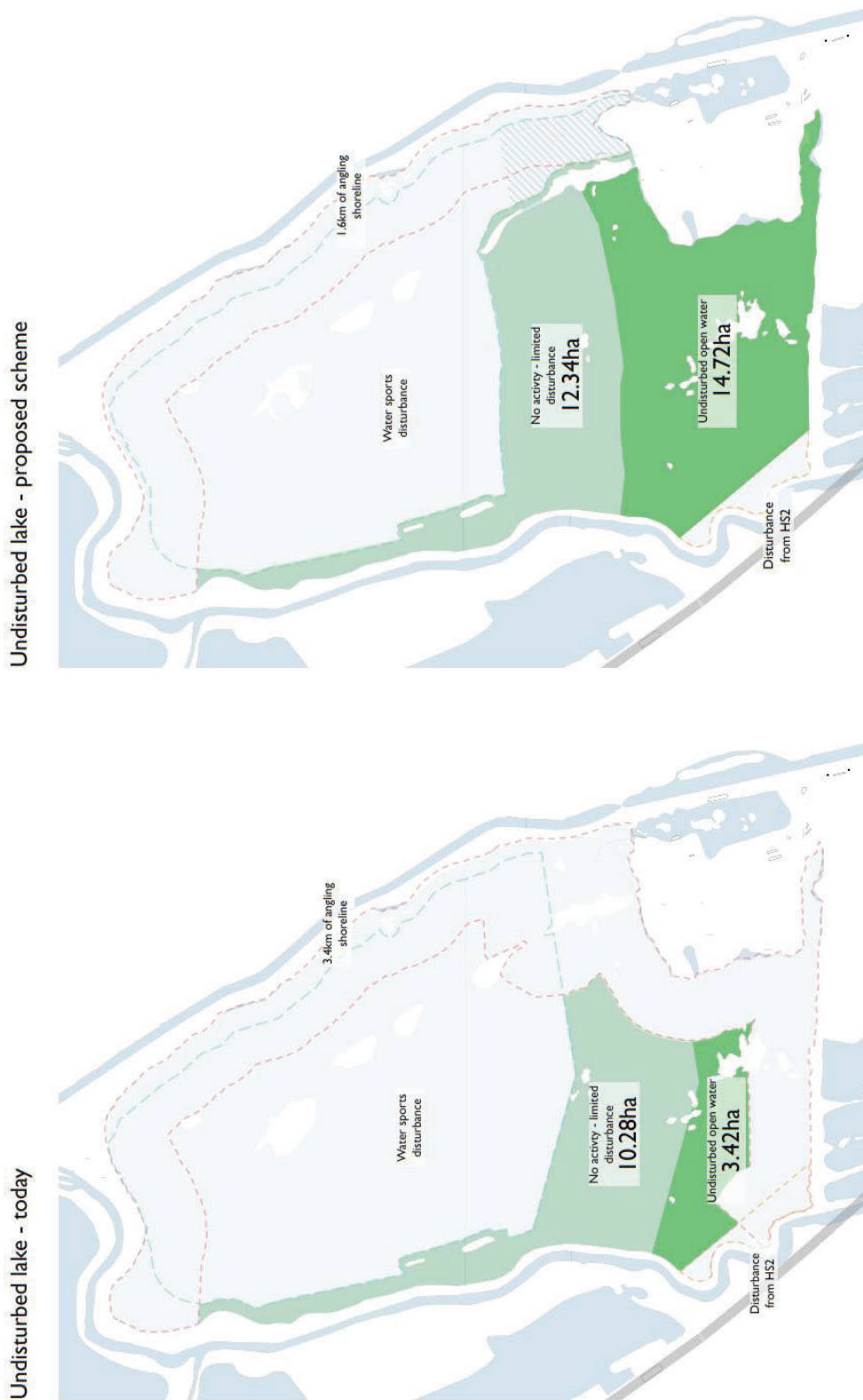


Figure 6. Water Disturbance Plan (please refer to HWSFAC-COL-XX-XX-DR-L-6189 Rev. 06)

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

4 Relevant Planning History

- 4.1 Broadwater Lake was originally created through extensive sand and gravel extraction carried out from the 1960s until the late 1990s, with the quarry formally decommissioned in 1992. The southern peninsula functioned as a gravel washing and processing plant containing silt lagoons, hardstanding and associated industrial structures, remnants of which still remain on site today. Following the cessation of mineral working, the former pits filled with water to form the present lake, which later became part of the Mid Colne Valley Site of Special Scientific Interest (SSSI) and has since been used primarily for recreational activities, including the Broadwater Sailing Club and angling. The site is therefore shaped by its quarrying legacy but long transitioned into a recreational and ecological landscape.
- 4.2 A list of the relevant planning history related to the property can be found in Appendix 2. In particular, the permissions referenced in Table 4 below are highlighted.

Table 4. Summary of Planning History

Planning Permission	Description
November 1986 Planning permission ref. 2382/X/85/739	Granted for the retention of planning permission (ref. 02382/820098(P)). This permission allowed the continued use of northern part of the lake for sailing. This application was subject to 6no. conditions.
November 1986 Planning permission ref. 2382Z/Y/86/1291	Granted for the relocation of sailing club shore facilities involving erection of clubhouse and dinghy enclosure with associated parking and access road at north end of Broadwater Lake. This application was subject to 5no. conditions.
May 1992 Planning permission ref. 2382/AL/92/0464	The wider Broadwater Lake area had been worked for sand and gravel extraction from the 1960s until the late 1990s, and the quarry was decommissioned in 1992. Planning permission ref. 2382/AL/92/0464 (dated May 1992) confirms that Hillingdon Council has registered and formally recognised the continued legal existence of a historic 1948 Interim Development Order (IDO) permission allowing the excavation of minerals by surface working at Broadwater Lake Quarry, Harefield. This registration does not allow quarrying or mineral extraction to resume. Before any extraction could have lawfully taken place, the operator was required to submit and obtain approval for a modern scheme of planning conditions, required under the Planning and

	Compensation Act 1991. There is no record of these conditions being submitted for approval.
June 1993 Planning permission ref. 2382/AK/92/0872	Granted for the renewal of planning permission ref. 2382/Y/86/739 for continued use of northern part of the lake for sailing.
August 1999 Planning permission ref. 2382/AM/98/2306	Granted for the erection of single storey extension to clubhouse.
October 1999 Planning permission ref. 2382/AN/99/0609	Granted for the renewal on a permanent basis of planning permission ref. 2382/AK/92/0872 for continued use of northern part of the lake for sailing.

5 Planning Policy

Development Plan

5.1 Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The statutory development plan for the London Borough of Hillingdon comprises the following documents:

- The Local Plan: Part 1 – Strategic Policies (adopted 2012)
- The Local Plan: Part 2 – Development Management Policies (adopted 2020)
- The Local Plan: Part 2 – Site Allocations and Designations (adopted 2020)
- The West London Waste Plan (adopted 2015)
- The London Plan (adopted 2021)

5.2 In accordance with national policy, due weight is to be given to development plan policies according to their degree of consistency with the National Planning Policy Framework (NPPF), with reduced weight being afforded where inconsistency is identified, within the statutory framework established by Section 38(6) of the Planning and Compulsory Purchase Act 2004.

Material Considerations

5.3 The NPPF (2024) is a significant material consideration in the determination of planning applications and must be taken into account alongside the development plan. This is particularly relevant where elements of the development plan are

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

out-of-date or inconsistent with national policy, although national policy remains relevant in all cases. In such circumstances, proposals are assessed having regard to the most up-to-date national policy position, alongside all other relevant material considerations, including supplementary planning documents and guidance.

- 5.4 The NPPF (2024) provides updated national policy on Green Belt land, including the identification of Grey Belt land and circumstances in which development may be considered appropriate. These provisions do not alter the fundamental purposes of the Green Belt or the substantial weight that must continue to be afforded to Green Belt harm. The development plan remains the statutory starting point for decision-making, however, where relevant local policies pre-date or do not reflect the Grey Belt framework, the NPPF constitutes a material consideration that informs the assessment of proposals. The statutory and national protections afforded to Sites of Special Scientific Interest remain fully applicable and are unaffected by the age of the development plan.
- 5.5 A list of planning policies relevant to the consideration of the application can be found in Appendix 3.

6 Consultations and Representations

- 6.1 As the planning application is subject to an Environmental Impact Assessment, the consultation requirements for the application are set out under both the Town and Country Planning (Development Management Procedure) (England) Order 2015 and the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. This requires that consultation is carried out for a period no less than 30 days. For robustness of approach, Officers determined that the application should be consulted on by letters, site notice and advertisement in the local paper for a period exceeding 30 days to account for overlap with public holidays. The approach is detailed in the report below.
- 6.2 Two formal rounds of consultation were carried out during the application process to account for the original planning application being submitted in November 2023 and the amended application being submitted in November 2025.
- 6.3 During the first round of consultation, a total of 3,357 consultation notifications were issued on 15th November 2023. This figure includes hard-copy letters sent to Harefield residents and emails sent to statutory and internal consultees. Site notices were also displayed on public roads surrounding the site, and an advert was published in the local newspaper. All forms of consultation expired on 20th December 2023, totalling 36 days of consultation.
- 6.4 During the second round of consultation, a total of 5,630 consultation notifications were issued on 26th November 2025. This figure includes hard-copy letters sent to Harefield residents and emails sent to statutory consultees, internal consultees and consultees who had previously commented on the application. Site notices were also displayed on public roads surrounding the site, and an advert was

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

published in the local newspaper. All forms of consultation expired on 9th January 2026, totalling 45 days of consultation.

- 6.5 More than 3,000 comments were received across both consultation periods, and a comprehensive exercise was undertaken to review and categorise the comments received. Any duplicate comments submitted were discounted to provide an accurate representation of the number of comments received on both the first and second rounds of consultation. For clarity, duplicate comments were considered and discounted as follows:
- Multiple comments submitted by the same individual were counted as one comment. For example, 5 comments received from an individual in the November 2023 consultation were counted as 1 comment.
 - If an individual submitted one comment in the November 2023 consultation and one comment in the November 2025 consultation, it was counted as one comment in each consultation period.
 - If comments were submitted by two individuals of the same household, it was counted as two comments. This accounts for members of a household that have differing views.
- 6.7 During the first round of consultation commencing in November 2023, a total of 578 no. comments in support and 1,092 objections were received. A petition in objection was also received with 50 valid signatures.
- 6.8 During the second round of consultation commencing in November 2025, a total of 41 no. comments in support and 484 objections were received. A petition in objection was also received with 121 valid signatures.
- 6.9 During the application process, it was confirmed that a freshwater ecology survey was omitted from the amended Environmental Statement submitted in November 2025. This related to biodiversity and water resources which are matters scoped into the Environmental Impact Assessment. As a result, it was deemed necessary to advertise the “further information” submitted as per Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The further information was advertised in the local paper on 4th March 2026 and the consultation period expired on 4th April 2026. During this period, two further comments in objection to the scheme were received, expressing concern for the impact on the environment and wildlife.
- 6.10 Representations received in response to the public consultation exercise are summarised in Table 5 (below). The statutory and internal consultee responses received are summarised in Table 6 (below). Full copies of the responses have also separately been made available to Members.

Table 5. Summary of Public Consultation Responses

Representations	Summary of Issues Raised	Planning Officer Response
Comments in Support		
<p>First Consultation (November 2023):</p> <p>578 no. letters of support received.</p> <p>Second Consultation (November 2025):</p> <p>41 no. letters of support received.</p> <p>Third Consultation – Newspaper only (March 2026):</p> <p>No comments received in support.</p>	<p>Individual Comments in Support:</p> <p>The comments of support are summarised below.</p> <p>1) The development will have social, community and educational benefits and will allow residents to experience nature.</p> <p>2) The former HOAC was lost to HS2.</p> <p>3) The development will provide better facilities than that at the former HOAC.</p> <p>4) The development will be accessible and inclusive.</p> <p>5) The development will meet the need for sport and recreational provision.</p> <p>6) The development will benefit the health of residents.</p> <p>7) The development will be to the benefit of ecology/biodiversity/SSSI.</p>	<p>All comments raised in support of the development are taken into consideration as part of the assessment.</p> <p>Please refer to paras 7.12 to 7.51 of the report for consideration of the social, community and public benefits of the scheme, including ecological and economic benefits.</p>
Comments in Objection		
<p>First Consultation (November 2023):</p> <p>1,092 no. letters of objection received.</p> <p>Petition in objection received</p>	<p>Individual Objections:</p> <p>The individual objections raised are summarised below.</p> <p>1) Harm and insufficient mitigation of harm to ecology/biodiversity/SSSI</p>	<p>All comments raised in objection to the development are taken into consideration as part of the assessment.</p> <p>Each point is addressed in turn below:</p>

<p>with 50 valid signatures.</p> <p>Second Consultation (November 2025):</p> <p>484 no. letters of objection received.</p> <p>Petition in objection received with 121 valid signatures.</p> <p>Third Consultation – Newspaper only (March 2026):</p> <p>Two comments received in objection.</p>	<p>during construction and operation.</p> <p>2) Broadwater Lake is not the right site for the replacement HOAC facility.</p> <p>3) The development sets the wrong precedent of development in a SSSI.</p> <p>4) The development is for profit.</p> <p>5) The development will cause traffic.</p> <p>First Petition:</p> <p>The petition in objection received under the first consultation is summarised below:</p> <p>6) Birds: Broadwater Lake is one of only two lakes in the Colne Valley where wildlife is a priority user and is a key contributor to the area's SSSI designation. The lake provides important habitat for nationally significant wintering bird populations. Dredging and winter construction works would cause unacceptable disturbance to resident and migrating birds.</p> <p>7) Eels: The lake supports a uniquely large and long-established population of European eels, a Critically Endangered species. Eels migrate to breed at sea, and Broadwater Lake's connection to the River Colne makes it a valuable</p>	<p>1) Please refer to paras 7.21 to 7.51 of the report for the assessment of impact to the SSSI and biodiversity.</p> <p>2) Please refer to paras 7.5 to 7.11 of the report for the assessment of alternative sites.</p> <p>3) Please refer to the main body of the report for consideration of the scheme as a whole.</p> <p>4) The development is proposed to replace the former HOAC facilities lost as a result of HS2. The facility was previously operated by the Colne Valley Youth & Community Association which is a youth charity prioritising outdoor and environmental education for young people, especially those who are disadvantaged or disabled.</p> <p>5) Please refer to paras 7.168 to 7.188 of the report for consideration of transport impacts.</p> <p>6) Please refer to paras 7.21 to 7.51 of the report for the assessment of impact to the SSSI and biodiversity. Conditions 15, 16, 41 and 55 are proposed to secure a Mitigation, Enhancement & Management Plan (MEMP), Construction</p>
---	---	--

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

	<p>source of breeding-age eels. Dredging is likely to damage or destroy essential eel feeding, resting and hibernation habitat, threatening the species' survival.</p> <p>8) Algal blooms: Dredging may also release stored nutrients that could worsen severe blue-green algal blooms, posing risks to human health and causing prolonged lake closures.</p> <p>Second Petition:</p> <p>The petition in objection received under the second consultation is summarised below:</p> <p>9) The petition requests that Broadwater Sailing Club (BSC) remain in its current northern location rather than being relocated to the new facility at the southern end of Broadwater Lake.</p> <p>10) Safety concerns: The proposed new facility lacks clear visibility of the sailing area from the clubhouse and shoreline.</p> <p>11) Difficult launch conditions: Trees in the Eastern Channel mask wind directions and create narrow access to open water, making sailing in/out unsafe.</p> <p>12) Reduced sailing and racing area due to willow tree growth shading the southern end of the lake (up</p>	<p>Environmental Management Plan, Operational Management and Activities Plan and a Monitoring, Reporting & Adaptive Management Plan.</p> <p>7) Whilst the original 2023 scheme proposed 47,356 m² of dredging, this was substantially reduced to 7,094 m² as part of the amended 2025 scheme. The amended submission addresses concerns regarding dredging and habitat loss, confirming that impacts are limited and will be offset through measures that increase shallow, structurally diverse, and refuge-rich habitat, alongside long-term protection and monitoring secured through the MEMP and OMAP. It is concluded that the survey evidence is robust, mitigation is secured, and the proposed development will not harm water vole or European eels.</p> <p>8) Regarding algal blooms, the Environmental Statement assesses potential nutrient release during dredging and concludes that, with mitigation, significant adverse effects on algal bloom formation are unlikely. This is</p>
--	---	--

	<p>to ten times higher than existing trees).</p> <p>13) Reduced boat park and rigging space, along with insufficient car parking at peak times.</p> <p>14) Significant loss of BSC facilities, including a major reduction in clubhouse/crew room floor area (from 50m² to 32m²) and no BSC-only changing rooms.</p> <p>15) No BSC safety boat or equipment storage is provided in the proposed relocation.</p> <p>16) Moving BSC southwards increases disturbance (activity and noise) within the SSSI and bird sanctuary, harming local wildlife.</p> <p>17) Financial implications: Leaving BSC in place avoids the costs of demolition, clearing the current BSC site, and constructing replacement facilities.</p>	<p>proposed to be secured by condition for the final and detailed Groundworks and Dredging Methodology (Condition 18), Construction Environmental Management Plan (Condition 16), and the Monitoring, Reporting & Adaptive Management Plan (Condition 55).</p> <p>9) to 17) A representation has been received from Trustees and Main Committee of the Broadwater Sailing Club. The comments acknowledge that Natural England will not allow the Hillingdon Water Sports Facility and Activity Centre and BSC to operate together on the north and south of the lake due to the disturbance to wildlife.</p> <p>The comments also confirm that Broadwater Sailing Club support the application and intend to occupy the development should permission be granted. As such, whilst there may be some concerns by some members of Broadwater Sailing Club, it is understood that the facilities proposed are fit-for-purpose and safe, subject to necessary controls and management practices.</p>
--	---	--

		<p>It is also understood that Broadwater Sailing Club currently have no long term right to occupy the existing premises and that the best way to secure the long term use of the site by Broadwater Sailing Club is through the proposed development, which has to be sensitive to constraints on the site including its SSSI status.</p> <p>UU HoT i is proposed to ensure that no development occurs until HOAC and Broadwater Saling Club enter into lease to occupy the development.</p> <p>In summary, it is considered that the proposal successfully balances both the operational needs of Broadwater Sailing Club with the ecological sensitivities of the site. The proposal is deemed to be fit-for-purpose and will be occupied by Broadwater Sailing Club.</p>
--	--	---

Table 6. Summary of Statutory and Internal Consultee Responses

Consultee and Summary of Comments	Planning Officer Response
Statutory Consultees	
<p>Affinity Water (Dated December 2023):</p> <p>Site lies within Source Protection Zone 1 (SPZ1) for public water supply boreholes. Planning conditions are required to prevent</p>	<p>The Affinity Water comments are noted and taken into consideration as part of the planning assessment.</p>

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

<p>contamination during excavation, piling, and dredging.</p> <p>Affinity Water (Dated December 2025):</p> <p>Confirmation that their response remains unchanged.</p>	<p>Please refer to Conditions 16, 18, 19, 20, and 21.</p>
<p>British Rowing (Dated December 2023):</p> <p>British Rowing supported the original proposal, noting the inclusion of rowing which aligns with its strategic plan for West London.</p> <p>British Rowing (Dated January 2026):</p> <p>British Rowing expressed disappointment that rowing is not included as part of the amended proposal. British Rowing encouraged HOAC to promote health and wellbeing in Hillingdon, which should include rowing.</p>	<p>The British Rowing comments are noted and taken into consideration as part of the planning assessment.</p> <p>It is noted that rowing no longer forms part of the proposal. Formal rowing lanes were removed from the planning application due to the length required for a rowing lane (750 metres - 1 kilometre). Such a proposal would have extended into the ecologically sensitive part of the lake to the south west and would not have been acceptable. The reduction in size of the boatsheds, required to reduce green belt and ecology impacts, was also a consideration as rowing boats are longer in length than dinghies used for sailing.</p>
<p>Broadwater Sailing Club (BSC) (Dated January 2026):</p> <p>The original proposal from October 2023 was supported because it aimed to create a world-class water sports activity centre, but the revised version from November 2025 is viewed as a significantly diluted plan that no longer delivers on that ambition. There is concern that BSC has been largely omitted from the updated planning documents, with unclear definitions of its access rights and the space it would be allocated. Further worries</p>	<p>The Broadwater Sailing Club comments are noted and taken into consideration as part of the planning assessment.</p> <p>Whilst Broadwater Sailing Club's original comments regarding the safety and feasibility are noted, their follow-up set of comments acknowledge the site constraints and sensitivities.</p>

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

<p>relate to safety, restricted sight lines, deterioration of the usable sailing area, inadequate boat storage for club members, difficult access to both the water and the sailing zone, and the overall reduction in the area available for sailing.</p> <p>Broadwater Sailing Club (Dated March 2026):</p> <p>Broadwater Sailing Club clarifies that its earlier letter was intended as a comment, not an objection. After meeting with the Applicant, the club understands the ecological constraints shaping the new facility and why both HOAC and BSC cannot operate on opposite sides of the lake as Natural England will not permit both to operate simultaneously due to potential wildlife disturbance. The club will be involved in developing the required Operational Management Plan, and although it viewed Dews Lane as an option, this has been ruled out by HS2 and the Council because of noise and safety concerns for children and vulnerable users. BSC supports the principle of the relocation, intends to occupy if permission is granted, and looks forward to contributing to the detailed design while continuing its long-standing sailing community on Broadwater Lake.</p>	<p>Unilateral Undertaking HoT i (Community Centre Delivery Plan) is proposed to secure HOAC and Broadwater Sailing Club as occupiers of the development. Whilst the proposal may be constrained, Broadwater Sailing Club have agreed to occupy and operate from the proposed facility.</p> <p>Please refer to the following conditions:</p> <p>Condition 15 - Mitigation, Enhancement and Management Plan</p> <p>Condition 40 - Steering Group Establishment & Function</p> <p>Condition 41 - Operational Management and Activities Plan</p> <p>Condition 55 - Monitoring, Reporting & Adaptive Management</p>
<p>Buckinghamshire County Council:</p> <p>No comments received.</p>	<p>N/A</p>
<p>Buglife (Dated January 2026):</p> <p>Buglife objected and state that the proposed redevelopment would cause significant harm to important invertebrate habitats within the Thames Basin Heath & Woodland Important Invertebrate Area, noting surveys that recorded rich assemblages, including Nationally Scarce species, and identifying Priority Habitats such as wet woodland and open water that would be lost or degraded through increased watersports activity, wave action, visitor pressure and artificial lighting. It highlights that these effects would also</p>	<p>The Bug Life comments are noted and taken into consideration as part of the planning assessment.</p> <p>Please refer to paras 7.21 to 7.51 for consideration of the impacts to the SSSI and Biodiversity.</p> <p>Please refer to paras 7.5 to 7.11 for consideration of the Alternative Sites Assessment.</p>

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

<p>negatively impact the Mid Colne Valley SSSI and the Broadwater Lake Metropolitan Site of Importance for Nature Conservation, both of which form part of key ecological networks. Buglife concludes that the development conflicts with the National Planning Policy Framework and Hillingdon Local Plan policies requiring protection of SSSIs and Sites of Importance for Nature Conservation, and therefore planning permission should not be granted.</p>	<p>The Applicant has responded to the Buglife objection and states that the ecological concerns raised are unfounded because all assessments were carried out by qualified ecologists, independently reviewed, and endorsed by Natural England, which raised no objections. They state that the scheme does not remove open water or priority habitats, as development mainly occurs on existing concrete, and that new shrub planting, shoreline restoration, floating habitats, and improved bank profiles will increase habitat diversity and invertebrate resources rather than harm them. The applicant also notes that the lake edge is already artificial and steep-sided, meaning wave-action effects are minimal, while a sensitive 0-lux lighting strategy will protect nocturnal species. Buglife's claims reflect a difference of opinion rather than evidence, and that the Environmental Statement provides a robust, evidence-based and policy-compliant assessment supported by the statutory nature conservation body.</p>
<p>Butterfly Conservation – Herts and Middlesex (December 2023):</p> <p>The objection to the original proposal centres on the risk of significant harm to the SSSI and its biodiversity, particularly butterfly and moth species. The entomology report highlights</p>	<p>The Butterfly Conservation – Herts and Middlesex comments are noted and taken into consideration as part of the planning assessment.</p>

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

<p>several noteworthy species that could be put at risk, and because the survey omitted the key flight period from mid-June to mid-August, it likely under-recorded important populations. With the UK committed to protecting 30% of land for nature by 2030 but currently safeguarding only 8.5%, developing within an existing SSSI is seen as counterproductive and a harmful precedent. On this basis, it is argued that alternative locations should be considered.</p> <p>No comments have been received regarding the 2025 amended proposal.</p>	<p>Please refer to paras 7.21 to 7.51 for consideration of the impacts to the SSSI and Biodiversity.</p> <p>Please refer to paras 7.5 to 7.11 for consideration of the Alternative Sites Assessment.</p> <p>The Environmental Statement states that the terrestrial invertebrate survey results recorded that 39 moth species were present, all of which are classed as “Local” status, meaning they are not rare or of national conservation concern. The report explains that the Peninsula is generally species-poor for invertebrates, with limited floral diversity and extensive buddleia reducing habitat quality, and while two invertebrate assemblages (scrub edge and rich-flower resource) are in favourable condition, there is no evidence of significant butterfly populations recorded on site. It is concluded that terrestrial invertebrates, including butterflies and moths, are of Local importance, with no species of high conservation concern identified.</p>
<p>Cadent Gas Ltd (November 2023):</p> <p>No objection raised to the original proposal.</p> <p>No comments have been received regarding the 2025 amended proposal.</p>	<p>The Cadent Gas Ltd comments are noted and taken into consideration as part of the planning assessment.</p>
<p>Canal Locks Conservation Panel:</p>	<p>N/A</p>

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

No comments received.	
<p>Canal & River Trust (CRT) (Dated December 2023)</p> <p>The CRT raised no objection but highlight concerns about the proposed bridge crossing, the treatment of the canal boundary and towpath access, possible effects on water quality, and general accessibility. It advised that planning conditions should require full details of the bridge design, including heritage and bat-roost assessments, lighting, construction methods, and long-term maintenance, as well as specifications for boundary treatments, landscaping and their upkeep, and a Construction and Environmental Management Plan.</p> <p>Canal & River Trust (CRT) (Dated December 2025)</p> <p>The amended proposal does not significantly affect the CRT's areas of interest, but their previous comments remain largely relevant.</p> <p>The CRT require three planning conditions: (1) Bridge-crossing and utilities-crossing details, (2) Canal-edge boundary treatment details, and (3) A Construction & Environmental Management Plan (CEMP)</p> <p>A financial contribution towards the Trust's Moorhall Road to Black Jacks Lock towpath project (1.8km) is requested. 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.</p>	<p>The Canal & River Trust comments are noted and taken into consideration as part of the planning assessment.</p> <p>Please refer to the following conditions:</p> <p>Condition 16 - Construction & Environmental Management Plan</p> <p>Condition 26 - Bridge 179</p> <p>Condition 34 - Landscape Scheme</p> <p>As the proposal is for a replacement of HOAC formerly located at Dews Lane, it is pertinent to note that the trips generated by the development are existing trips which have been suspended following the displacement of the former HOAC facility.</p> <p>The proposal would most intensively be used in the Summer. Existing users include members of Broadwater Sailing Club, and the Angling Society. As these are existing users, the number of additional users is not expected to be significant.</p> <p>New users of the site include educational groups including children who would mostly travel in large groups by coach from one starting destination such as a school or college. The use</p>

	<p>profile of the development does not therefore result in significant use of the canal towpath, meaning that it would not meet the relevant tests to require that the development funds to the shortfall identified by the Canal and River Trust. It does, however, meet the tests for the development to cover a proportion of the towpath works. It is concluded that a £140,000 contribution shall be made towards towpath works. This is proposed to be secured under UU HoT ii and the sum is amalgamated to total £177,800 as a contribution towards Healthy Streets and Active Travel Zone measures.</p>
<p>Colne Catchment Action Network (CAN) (Dated December 2023):</p> <p>CAN object to the relocation of HOAC to Broadwater Lake on the basis that it would cause major, irreversible damage to the Mid-Colne Valley SSSI. The proposal is seen as conflicting with both national and local policy, posing severe ecological harm and creating unacceptable disturbance risks. Mitigation measures are viewed as inadequate, and it is argued that a different location should be sought—one that better balances recreational needs with the protection of nature.</p> <p>No comments have been received regarding the 2025 amended proposal.</p>	<p>The Colne Catchment Action Network comments are noted and taken into consideration as part of the planning assessment.</p> <p>Please refer to paras 7.21 to 7.51 for consideration of the impacts to the SSSI and Biodiversity.</p> <p>Please refer to paras 7.5 to 7.11 for consideration of the Alternative Sites Assessment.</p>
<p>Colne Valley Regional Park / Colne Valley Park Trust (Dated December 2023):</p> <p>Colne Valley Regional Park / Colne Valley Park Trust object despite general support for relocating HOAC. Broadwater Lake is</p>	<p>The Colne Valley Regional Park / Colne Valley Park Trust comments are noted and taken into consideration as part of the planning assessment.</p>

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

<p>regarded as a nationally protected and highly sensitive site where the development could cause ecological harm, and it is considered to conflict with national planning policy set out in the NPPF. Concerns are also raised about the robustness and conclusions of the Alternative Sites Assessment.</p> <p>Colne Valley Regional Park / Colne Valley Park Trust (Dated January 2026):</p> <p>Although the revised application shows some improvement, the core concern persists. The development would still negatively affect the SSSI and remain in conflict with both national and local planning policies as well as the objectives of the Colne Valley Regional Park. Broadwater Lake is viewed as an unsuitable location for this scale and type of development, and it is argued that alternative sites must be properly explored.</p>	<p>Please refer to paras 7.21 to 7.51 for consideration of the impacts to the SSSI and Biodiversity.</p> <p>Please refer to paras 7.5 to 7.11 for consideration of the Alternative Sites Assessment.</p>
<p>Campaign to Protect Rural England (CPRE) (Dated January 2026):</p> <p>The development is opposed because it would be built within a SSSI and cause harm to the Green Belt, without any valid exceptional circumstances to justify it. The view is that intensive water-sports activity cannot operate alongside the conservation needs of such a highly protected site. It is argued that other locations exist, and that relocating activities across two or more nearby sites would avoid these impacts while still meeting the project's aims.</p>	<p>The CPRE comments are noted and taken into consideration as part of the planning assessment.</p> <p>Please refer to paras 7.21 to 7.51 for consideration of the impacts to the SSSI and Biodiversity.</p> <p>Please refer to paras 7.5 to 7.11 for consideration of the Alternative Sites Assessment.</p> <p>Please refer to paras 7.52 to 7.81 for consideration of the Green Belt.</p>
<p>Denham Airport Safeguarding (Dated December 2025):</p> <p>No objection raised to the revised proposal.</p>	<p>The Denham Airport Safeguarding comments are noted and taken into consideration as part of the planning assessment.</p>
<p>Denham Parish Council (Dated December 2023):</p>	<p>The Denham Parish Council comments are noted and</p>

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

Denham Parish Council object on the grounds of potential harm to wildlife within a site of special scientific interest (SSSI).

Denham Parish Council (Dated December 2025/January 2026):

Denham Parish Council object and would like to support Colne Valley Regional Park recommendations that have been submitted. Their suggestion of using Troy Lake for sailing that they use in the summer and the original location needs to be explored further. The water ski club condition of use should remain, as previously determined by Bucks Council. Where development is proposed it is defined as SSSI, in a Floodplain area, which is excluded from the definition of Grey Belt. We should be improving biodiversity net gain, not destroying the area with intensification of use.

taken into consideration as part of the planning assessment.

HOAC is operating only a highly reduced, temporary programme from Troy Lake during the 2025 Easter and Summer school holidays, consisting solely of kayaking and dinghy sailing for around 20 children per day, with no term-time activities and no services for schools, colleges, youth organisations, adults or community groups, a drastic reduction compared with historic activity levels at the former HOAC site. This temporary arrangement is permitted by Rickmansworth Sailing Club to keep HOAC's two remaining staff employed while a permanent site is sought. Troy Lake cannot support full operations due to its small site area (under two hectares), insufficient facilities (only two toilets, one shower, limited storage, no camping space) and the need to share space with RSC, meaning it is not viable as a medium- or long-term home for HOAC.

Please refer to paras 7.21 to 7.51 for consideration of the impacts to the SSSI and Biodiversity.

Please refer to paras 7.131 to 7.139 for consideration of Biodiversity Net Gain requirements.

	<p>Please refer to paras 7.5 to 7.11 for consideration of the Alternative Sites Assessment.</p> <p>Please refer to paras 7.52 to 7.81 for consideration of the Green Belt.</p> <p>Please refer to paras 7.82 to 7.86 for consideration of Flood Risk and Sequential Test.</p> <p>Please refer to paras 7.140 to 7.150 for consideration of Flood Risk and Drainage.</p>
<p>Environment Agency (Dated January 2026):</p> <p>The objection is based on four major concerns, arguing that permission should be refused unless the applicant submits substantial new evidence on flood-risk modelling, pollution controls and permitting, compliance with the Water Framework Directive, and adequate protection and mitigation measures for water voles and eels. It is also noted that if the Local Planning Authority decides to approve the application despite the Environment Agency’s objections, the case must be referred to the Secretary of State under the 2024 Consultation Direction.</p> <p>Environment Agency (Dated April 2026):</p> <p>Following review of the updated environmental information, including flood risk, drainage, groundwater, contamination and Water Framework Directive (WFD) assessments, the Environment Agency confirmed that it removes its previous objection to the scheme, subject to the imposition of planning conditions. These conditions are required to ensure no increased flood risk, protect groundwater within a highly sensitive principal aquifer and Source Protection Zone 1, manage</p>	<p>The Environment Agency comments are noted and taken into consideration as part of the planning assessment.</p> <p>Please refer to the following sections of the report for consideration of each EA objection:</p> <p>Paras 7.146 to 7.148 - EA Objection 1 regarding Flood Risk</p> <p>Paras 7.155 to 7.157 - EA Objection 2 regarding Pollution Control & Waste/Permit Requirements</p> <p>Paras 7.29 to 7.31 – EA Objection 3 regarding impacts on Waterbodies (WFD)</p> <p>Paras 7.29 to 7.31 – EA Objection 4 regarding Protected / Priority Species</p> <p>In summary, the Applicant has submitted sufficient</p>

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

<p>contamination, and secure compliance with national policy and the Hillingdon Local Plan. Without these conditions, the Environment Agency would object to the development.</p> <p>The recommended conditions cover flood risk mitigation and compensatory storage, detailed land contamination investigation and remediation, groundwater monitoring, controls over piling, drilling and foul drainage infrastructure, and a comprehensive suite of biodiversity and WFD measures. These include detailed mitigation, construction and operational management plans, a lake restoration strategy, and specific protection plans for legally protected European eel and water vole. The Environment Agency emphasises that the site's ecological sensitivity and SSSI status require robust long-term management and monitoring to prevent environmental deterioration. It also advises that separate environmental permits may be required and confirms that planning permission does not guarantee permitting consent.</p>	<p>information to resolve the objections. Subject to planning conditions, the EA have confirmed no objection.</p> <p>Please refer to the following conditions:</p> <p>Condition 15 - Mitigation, Enhancement & Management Plan (MEMP)</p> <p>Condition 16 - Construction & Environmental Management Plan (CEMP)</p> <p>Condition 18 - Groundworks, Excavations, Piling and Dredging</p> <p>Condition 19 - Contaminated Land, Remediation Strategy and Unexpected Contamination</p> <p>Condition 20 - Surface Water Drainage Scheme</p> <p>Condition 21 - Broadwater Sailing Club Area (Contamination)</p> <p>Condition 22 - Lake Restoration Strategy</p> <p>Condition 23 - Legally Protected Species - European Eel</p> <p>Condition 24 - Legally Protected Species - Water Vole</p> <p>Condition 36 - Flood Risk Management Details</p>
--	---

	<p>Condition 40 - Steering Group Establishment & Function</p> <p>Condition 41 - Operational Management & Activities Plan (OMAP)</p> <p>Condition 55 - Monitoring, Reporting & Adaptive Management Plan</p>
<p>Friends of Stockers Lake (Dated December 2023):</p> <p>Objection citing the conclusions of a Parliamentary Select Committee, along with Hillingdon Council, HS2 and HOAC, that Broadwater Lake was not a suitable relocation site due to its ecological importance. Supportive of the HOAC in principle but not of this site being used for this purpose.</p> <p>No comments have been received regarding the 2025 amended proposal.</p>	<p>The Friends of Stockers Lake comments are noted and taken into consideration as part of the planning assessment.</p> <p>It is understood that the Parliamentary Select Committee did not issue a formal ruling preventing Broadwater Lake from being used but there was a general agreement at that time in 2015, that the SSSI designation was considered to make relocation to this site inappropriate when considered from a high level perspective. This did not consider the impacts of a proposal as the current application does.</p> <p>Please refer to paras 7.21 to 7.51 for consideration of the impacts to the SSSI and Biodiversity.</p> <p>Please refer to paras 7.5 to 7.11 for consideration of the Alternative Sites Assessment.</p>
<p>Gerrards Cross and Uxbridge District Angling Society:</p> <p>No comments received.</p>	<p>N/A</p>

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

<p>Greater London Archaeological Advisory Service (Dated December 2023):</p> <p>The planning application site is not within an Archaeological Priority Area. No further archaeological assessment or planning conditions are required.</p> <p>Greater London Archaeological Advisory Service (Dated December 2025):</p> <p>No further comments regarding the amended proposal.</p>	<p>The Greater London Archaeological Advisory Service comments are noted and taken into consideration as part of the planning assessment.</p>
<p>Greater London Authority (GLA) - Stage 1 (Dated April 2024):</p> <p>Land Use Principles: Whilst the proposed co-located and enhanced water sports facility and activity centre is supported in principle, further local assessment of need, alternative sites, and views is required to demonstrate that there would be Very Special Circumstances alongside secured public benefits to outweigh impact on the openness of the Green Belt. Furthermore, given the limited public transport accessibility of the site, the applicant and the Council must ensure that the identified transport issues are appropriately addressed.</p> <p>Urban design: Non-permeable surfacing should be limited and reduced where possible. A fire statement is required.</p> <p>Transport: The proposed access should be designed in line with the Mayor’s Healthy Streets approach. Further detail is required on the submitted daytime Active Travel Zone assessment, how the access road and footpath would comply with the Mayor’s Vision Zero approach, and on the proposed signage and wayfinding strategy. Car parking should be reduced and further details of cycle parking provided. A shuttle service should be considered.</p>	<p>The Greater London Authority comments are noted and taken into consideration as part of the planning assessment.</p> <p>Please refer to the sections referenced below for consideration of the points raised.</p> <p>Land use principles: paragraphs 7.1 to 7.89</p> <p>Urban design: paragraphs 7.91 to 7.105</p> <p>Fire safety: paragraphs 7.104 to 7.105</p> <p>Inclusive design: paragraphs 7.100 to 7.101</p> <p>Transport: paragraphs 7.168 to 7.188</p> <p>Sustainability: paragraphs 7.189 to 7.202</p> <p>Energy: paragraphs 7.191 to 7.193</p>

<p>Other issues on sustainable development, and environmental issues also require resolution prior to the Mayor's decision making stage.</p> <p>Greater London Authority - Stage 1 Addendum (Dated March 2026):</p> <p>A previous Stage 1 report was issued for a similar scheme, but the proposal has since been significantly redesigned with reduced massing and footprint.</p> <p>Land use principles:</p> <p>The new submission provides further evidence regarding the alternative sites assessment, user-group benefits (schools, SEND users, scouts/guides, emergency services, etc.), and a views assessment. With these, it is likely VSC can be demonstrated, though final judgement rests with the Mayor at Stage 2. The applicant has also argued the site meets the NPPF's new Grey Belt criteria; the Council must assess this carefully given the site is an SSSI (relevant under NPPF footnote 7).</p> <p>Urban design:</p> <p>The revised design is considered contextual and sensitive to the Green Belt setting. Massing, building forms and landscaping respond well to topography and limit visual impact. The materials and architecture are supported, with Council oversight recommended to secure design quality.</p> <p>Fire safety:</p> <p>A Gateway One Fire Statement Form has been provided, but a full fire statement is still required in line with the Mayor's draft Fire Safety London Plan Guidance. This must be submitted before the Mayor makes his decision.</p> <p>Inclusive design:</p>	<p>Biodiversity (including SSSI and SINIC considerations): paragraphs 7.21 to 7.51</p> <p>Drainage: paragraphs 7.140 to 7.150</p> <p>Circular-economy: paragraphs 7.197 to 7.200</p>
--	--

<p>The design includes inclusive sanitary provision, accessible camping, quiet spaces and clear wayfinding. The Council should secure M4(2) and M4(3) accessibility requirements via condition.</p> <p>Transport:</p> <p>Some issues have been addressed, but outstanding matters remain on ATZ, lighting, parking, modal shift, cycle parking and deliveries.</p> <p>Sustainability:</p> <p>Additional reports highlight outstanding requirements on:</p> <p>Energy:</p> <p>Compliance with policy requirements should be secured through condition and legal agreement.</p> <p>Other environmental matters:</p> <p>Effects on the SINC, biodiversity, sustainable drainage and circular-economy requirements need further evidence and conditions.</p>	
<p>Groundwork Thames Valley:</p> <p>No comments received.</p>	<p>N/A</p>
<p>Harrow Angling Society (Dated December 2023):</p> <p>Concerns raised over the proposal to encourage Otters to use Broadwater Lake, and the threat this would pose to fish stocks in Colne Valley.</p> <p>No comments have been received regarding the amended proposal.</p>	<p>The Harrow Angling Society comments are noted and taken into consideration as part of the planning assessment.</p>
<p>Heathrow Airport Safeguarding (Dated November 2025):</p>	<p>The Heathrow Airport Safeguarding comments are noted and taken into</p>

<p>No safeguarding objections to the proposed development.</p>	<p>consideration as part of the planning assessment.</p>
<p>Hertfordshire County Council - Planning (Dated November 2023):</p> <p>Not in a position to formally object but highlights that during the HS2 Bill process it is understood that the relocation of HOAC to this location was not deemed appropriate and expects Hillingdon Council to take into account the potential impacts upon the SSSI.</p> <p>Hertfordshire County Council – Highways Authority (Dated November 2023):</p> <p>No objection to the proposed development and does not wish to restrict planning permission.</p> <p>No comments have been received regarding the amended proposal.</p>	<p>The Hertfordshire County Council comments are noted and taken into consideration as part of the planning assessment.</p> <p>Please refer to paras 7.21 to 7.51 for consideration of the impacts to the SSSI and Biodiversity.</p> <p>Please refer to paras 7.131 to 7.139 for consideration of Biodiversity Net Gain requirements.</p> <p>Please refer to paras 7.5 to 7.11 for consideration of the Alternative Sites Assessment.</p>
<p>Herts and Middlesex Wildlife Trust (Dated December 2023):</p> <p>The Herts and Middlesex Wildlife Trust object as the proposal would cause significant harm to biodiversity within the Mid Colne Valley SSSI, with disturbance expected to breeding, moulting and wintering waterbirds, including nationally important populations of Shoveler. It raises further concern over negative impacts on bats, ten species are present, including rare Barbastelle and Nathusius' pipistrelle, as well as critically endangered European eels and overall water quality. Dredging and increased activity will diminish insect prey and degrade aquatic ecosystems. They state that the proposal fails to comply with national, regional and local planning policy and does not meet statutory Biodiversity Net Gain requirements under the Environment Act 2021. They also consider the environmental statement inadequate for such a sensitive ecological site. The view is that intensive water sports are incompatible with nature conservation on a lake of this scale, that the</p>	<p>The Herts and Middlesex Wildlife Trust comments are noted.</p> <p>Please refer to paras 7.21 to 7.51 for consideration of the impacts to the SSSI and Biodiversity.</p> <p>Please refer to paras 7.131 to 7.139 for consideration of Biodiversity Net Gain requirements.</p> <p>Please refer to paras 7.5 to 7.11 for consideration of the Alternative Sites Assessment.</p> <p>The Applicant Team submitted a response document to the Herts and Middlesex Wildlife Trust and emphasised that all ecological assessments</p>

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

Alternative Sites Assessment is flawed, and that Broadwater Lake has previously been ruled out by official reviews. Finally, they state that consultation was both late and insufficient.

Herts and Middlesex Wildlife Trust (Dated January 2026):

The Herts and Middlesex Wildlife Trust object to the amended proposal. The objection focuses on ecological harm, inadequate mitigation, and conflicts with policy, with concerns raised in the previous objection not being adequately addressed from their point of view. They conclude Hillingdon Council would breach its statutory duty to conserve and enhance biodiversity if permission is granted.

were carried out by suitably qualified ecologists in line with best practice. The Applicant maintained that the Environmental Statement is robust, proportionate and evidence-based, supported by extensive surveys, reasonable worst-case assumptions, and a management and monitoring framework enabling adaptive measures if required.

Officers also note that the application has been independently reviewed by Arup on behalf of the Council, the Environment Agency (the statutory body responsible for protecting and regulating the environment) and Natural England (the statutory body responsible for nature conservation). Critically, the Environment Agency and Natural England have confirmed no objection subject to securing all necessary mitigation, enhancement, monitoring and long-term management measures.

Please refer to the following conditions:

Condition 15 - Mitigation, Enhancement and Management Plan

Condition 41 - Operational Management and Activities Plan

	<p>Condition 40 - Steering Group Establishment & Function</p> <p>Condition 55 - Monitoring, Reporting & Adaptive Management</p>
<p>Herts and Middlesex Bat Group (Dated July 2024):</p> <p>The Herts and Middlesex Bat Group object and state that the proposal would cause substantial harm to biodiversity and lead to the deterioration of SSSI features, particularly through adverse impacts on bat species that rely on the site. Concerns include the loss of established roosting locations, both within the canal bridge structure and in surrounding trees, as well as the destruction of feeding and commuting habitat resulting from dredging, tree removal and island clearance. It is also argued that intensifying water-based activities would diminish water quality and reduce insect prey availability, thereby compromising essential bat foraging resources. Additional concern is raised over the proposed lighting design, which could disrupt light-sensitive species and alter natural movement patterns. The objector believes that, taken together, these impacts place the scheme in breach of the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981, and that the proposal also fails to satisfy the statutory biodiversity duty set out under the Environment Act 2021.</p> <p>No comments have been received regarding the 2025 amended proposal.</p>	<p>The Herts and Middlesex Bat Group comments are noted and taken into consideration as part of the planning assessment.</p> <p>Please refer to paras 7.21 to 7.51 for consideration of the impacts to the SSSI and Biodiversity.</p> <p>Please refer to paras 7.131 to 7.139 for consideration of Biodiversity Net Gain requirements.</p> <p>Please refer to paras 7.5 to 7.11 for consideration of the Alternative Sites Assessment.</p> <p>Broadwater Lake supports a moderately diverse bat assemblage of at least ten species. Detailed tree-climb, emergence, building and thermal-drone surveys in 2023–2025 identified no bat roosts within areas affected by the development. Although HS2 radio-tracking data indicated historical roosts elsewhere on site, these were approximate and none fall within the construction footprint. With embedded mitigation, including a best-practice dark-corridor lighting strategy (≤ 0.4 lux on vegetation), retention of</p>

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

	<p>woodland habitats, pollution and noise controls, and operational management to prevent disturbance, impacts to both foraging and roosting bats will be negligible to minor and not significant, with potential minor positive effects arising from habitat enhancements such as improved woodland structure, increased invertebrate resources and new bat boxes.</p> <p>Conditions 13, 15, 16, 34, 41 and 46 (securing the final acceptable details for CEMP, Lighting Strategy, MEMP, and OMAP) shall ensure that any impact is mitigated.</p>
<p>Hillingdon Friends of the Earth (Dated January 2024):</p> <p>Hillingdon Friends of the Earth object as the proposal would cause harm to wildlife, natural habitats and local water resources, with particular concern for the critically endangered European eel, which is known to inhabit Broadwater Lake. As a priority species under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 and protected by the Eels Regulations 2009, any deterioration of its habitat is considered unacceptable. The objector questions the reliability of the applicant’s ecological appraisal and argues that dredging would damage eel habitat, reduce water quality and threaten compliance with the Council’s legal biodiversity duties under Section 40 of the NERC Act and NPPF 174(a), which require the protection of habitats of principal importance. They also highlight that the lake lies within an Inner Source Protection Zone for drinking water, meaning dredging should not proceed without formal engagement with Affinity Water. The objection suggests that the</p>	<p>The Hillingdon Friends of the Earth comments are noted and taken into consideration as part of the planning assessment.</p> <p>Affinity Water have been consulted and have confirmed no objection subject to Conditions 16, 18, 19, 20, and 21.</p> <p>The dredging proposals have been significantly reduced as part of the revised proposals. The impact on European Eels has been raised by the Environment Agency and they have confirmed no objection subject to the securement of Conditions 15, 16, 18, 19, 20, 21, 22, 23, 24, 36, 40, 41, and 55.</p>

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

<p>Council should reconsider using Pit 3, the existing HOAC lake, as an alternative relocation site, potentially combined with limited sailing activity at the northern end of Broadwater. It further argues that nearby HS2 biodiversity mitigation areas should be assessed and enhanced, and that rebuilding the centre at its former location could help restore degraded habitats.</p> <p>No comments have been received regarding the 2025 amended proposal.</p>	<p>Natural England have also confirmed no objection subject to Conditions 14, 15, 16, 40, 41, and 55.</p> <p>Please refer to paras 7.21 to 7.51 for consideration of the impacts to the SSSI and Biodiversity.</p> <p>Please refer to paras 7.131 to 7.139 for consideration of Biodiversity Net Gain requirements.</p> <p>Please refer to paras 7.5 to 7.11 for consideration of the Alternative Sites Assessment.</p>
<p>Hillingdon Junior Canoe Club (Dated December 2023):</p> <p>This club supports junior canoeing athletes in Hillingdon and helped to champion GB canoeing worldwide. The HOAC is a facility that should be re-established as soon as possible.</p> <p>No comments have been received regarding the 2025 amended proposal.</p>	<p>The Hillingdon Junior Canoe Club comments are noted and taken into consideration as part of the planning assessment.</p>
<p>Hillingdon Narrow Boat Association (Dated January 2026):</p> <p>Hillingdon Narrowboats Association strongly supports the Broadwater Lake development, seeing it as a valuable and positive replacement for the lost HOAC facilities and a long-term benefit to the community, particularly young people, disabled users and future generations. They believe ecological harm would be minimal and outweighed by gains such as managing non-native species, and they emphasise their long-standing involvement in the area, including a detailed 2025 site visit. While they respect objections from environmental organisations, they argue</p>	<p>The Hillingdon Narrow Boat Association comments are noted and taken into consideration as part of the planning assessment.</p>

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

<p>these groups offer no viable alternatives and overlook the risk of the site deteriorating if left undeveloped. HNA maintains that activities on waterways promote health, wellbeing and a deeper connection with nature, and they look forward to collaborating with those delivering the Broadwater Lake project.</p>	
<p>Hillingdon Outdoor Activity Centre (HOAC) (Dated January 2026):</p> <p>HOAC express support for the principle of relocating HOAC, with emphasis on the urgent need to restore the community, educational and youth-development programmes that were lost when HS2 displaced the former centre. However, concerns remain regarding the limited consultation and lack of constructive dialogue between key parties, with calls for more meaningful cooperation on environmental management and the practical safety features of the proposed site. There is particular worry that the constraints currently proposed, especially restrictions on water-user numbers and operational hours, mean the new facility would not meet HS2’s funding requirement that any replacement must be “<i>fit for purpose</i>” and “<i>substantially the same</i>” as the former HOAC site, placing the project’s viability at risk.</p> <p>To ensure the scheme properly serves its intended purpose, it is argued that planning approval should include conditions that legally secure the site for HOAC and Broadwater Sailing Club as primary users, establish a Joint Operational Management Plan between LBH, HOAC and Natural England to balance educational access with SSSI conservation, and require outcome-based capacity and zoning reviews informed by real-world environmental monitoring rather than modelling alone. It is also requested that HOAC have oversight and final sign-off on infrastructure design, covering water-access points, launch areas, buildings and land-based activity zones, to guarantee the site is operationally safe and suitable for delivering its full range of activities.</p>	<p>The Hillingdon Outdoor Activity Centre comments are noted and taken into consideration as part of the planning assessment.</p> <p>Whilst HOAC’s original comments regarding the operational restrictions are noted, their follow-up set of comments acknowledge the site constraints and sensitivities of the site. Unilateral Undertaking HoT i (Community Centre Delivery Plan) is proposed to secure HOAC and Broadwater Sailing Club as occupiers of the development. Whilst the proposal may be constrained, HOAC have agreed to occupy and operate from the proposed facility.</p> <p>Please refer to the following conditions:</p> <p>Condition 15 - Mitigation, Enhancement and Management Plan</p> <p>Condition 41 - Operational Management and Activities Plan</p> <p>Condition 40 - Steering Group Establishment & Function</p>

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

<p>Hillingdon Outdoor Activity Centre (HOAC) (Dated February 2026):</p> <p>HOAC have reiterated support the scheme. Following further meetings with the Applicant team, they wish for the application to be approved so that the centre can relocate to Broadwater Lake. They explain that although earlier design comments were not fully reflected in the plans, they now understand this was due to ecological constraints and the need for high safeguarding standards for children and vulnerable users. They also acknowledge that the ecological mitigation strategy is highly complex and dictated by planning legislation, meaning the design had limited flexibility. The Applicant has agreed to the planning conditions HOAC previously requested, and both parties accept that outstanding operational concerns can be addressed through a joint Operational Management Plan in which HOAC will play an active role. HOAC confirms it has no objection to the principle of the development, supports the application, and will submit a separate undertaking committing to occupy the facility should permission be granted.</p>	<p>Condition 55 - Monitoring, Reporting & Adaptive Management</p>
<p>HS2 Safeguarding (Dated January 2024):</p> <p>HS2 reviewed the original submission against the authorised HS2 ecological mitigation works at Broadwater Lake and raised concerns that the applicant proposed relocating HS2-consented gravel nesting islands, requiring further assessment to ensure continued compliance with HS2's Environmental Minimum Requirements (EMRs). HS2 advised that it could not yet establish whether the applicant's scheme and HS2's legally required mitigation could coexist without conflict, pending additional information. The further details requested included: how visitors and dogs would be controlled to prevent disturbance to sensitive areas; whether fencing would be used to enforce restrictions; confirmation that sailing would not occur near islands 32 and 45; and</p>	<p>The HS2 Safeguarding comments are noted and taken into consideration as part of the planning assessment.</p> <p>Please refer to paras 8.1 to 8.3 for consideration of the HS2 safeguarding matters.</p> <p>The following Conditions are proposed to be secured:</p> <p>Condition 16 - Construction Environmental Management Plan</p> <p>Condition 17 - Construction Logistics Plan</p>

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

<p>clarification on whether screening trees east of island 32 would be retained.</p> <p>HS2 Safeguarding (Dated December 2025):</p> <p>HS2 confirmed that many earlier concerns had been resolved and therefore raised no objection subject to safeguarding conditions but highlighted several matters still requiring correction or clarification. HS2 noted inaccuracies in the application relating to the positions of the floating gravel islands, which did not match HS2’s Schedule 17-approved locations and were shown further north, and requested consistent use of HS2’s terminology while emphasising that the gravel islands form part of HS2’s statutory ecological mitigation rather than applicant-led enhancements. HS2 also disputed the Environmental Statement’s claim that HS2 construction was complete, clarified that commissioning and IAMC strategy work remained ongoing, and flagged that the applicant’s information about a proposed Steering Group did not align with HS2’s experience of having received no formal invitation. It further raised concern that recent 2023–2024 bat survey data collected by Align may not have been incorporated. To protect the HS2 programme and assets, HS2 requested the imposition of planning conditions requiring a Construction Environmental Management Plan and Construction Logistics Plan and reminded the Council that failure to impose these would necessitate referral to the Department for Transport’s High Speed Rail Property Team under 2018 Safeguarding Directions.</p>	<p>Condition 34 - Landscape Scheme</p> <p>Condition 40 - Steering Group</p>
<p>Ickenham Residents’ Association (Dated December 2023):</p> <p>Ickenham Residents’ Association express support for relocating HOAC but also recognise concerns about possible impacts on wildlife and the surrounding SSSI. They note</p>	<p>The Ickenham Residents’ Association comments are noted and taken into consideration as part of the planning assessment.</p>

<p>that the proposal currently achieves only a 3% biodiversity net gain and recommend increasing this to at least 10% through a planning condition, in line with national policy expectations.</p>	<p>Please refer to paras 7.21 to 7.51 for consideration of the impacts to the SSSI and Biodiversity.</p> <p>Please refer to paras 7.131 to 7.139 for consideration of Biodiversity Net Gain requirements.</p> <p>The BNG Addendum submitted confirms that the scheme delivers a 9.72% area-based biodiversity gain, which is less than the 10% gain ordinarily required through statutory Biodiversity Net Gain. However, as the planning application was originally submitted prior to 12 February 2024, it falls under transitional provisions of the Environment Act and is not legally required to achieve the mandatory 10% BNG threshold. Nevertheless, the Applicant commits to meaningful ecological enhancement, secured through the long-term Management and Enhancement Management Plan (MEMP).</p>
<p>London Fire Brigade (LFB) (Dated December 2023):</p> <p>The Gateway One Fire Statement for the proposed redevelopment of Broadwater Lake.</p> <p>LFB wishes to highlight fire risks associated with poorly installed PV systems and green roofs and advises the applicant to follow all relevant regulations and guidance.</p> <p>No comments have been received regarding the 2025 amended proposal.</p>	<p>The London Fire Brigade comments are noted and taken into consideration as part of the planning assessment.</p> <p>A final detailed Fire Statement is proposed to be secured under Condition 45.</p>

<p>London Wildlife Trust (Dated December 2023):</p> <p>Objection on the grounds the original proposal would have major adverse impacts on the SSSI, the Mid-Colne Valley Site of Metropolitan Importance (SMINC), and broader biodiversity.</p> <p>The scheme would result in the permanent loss of open water and woodland habitats, which cannot be effectively replaced, along with the loss of essential bird roosting, nesting and feeding areas, including refuge islands crucial for wintering and breeding species. The objection also expresses low confidence in the reliability of the ecological reports submitted in support of the proposal. Additionally, it states that the Alternative Sites Assessment applied its criteria inconsistently across different locations, and that consultation was inadequate, with London Wildlife Trust not being involved despite claims to the contrary in the Statement of Community Involvement.</p> <p>No comments have been received regarding the 2025 amended proposal.</p>	<p>The London Wildlife Trust comments are noted and taken into consideration as part of the planning assessment.</p> <p>Please refer to paras 7.21 to 7.51 for consideration of the impacts to the SSSI and Biodiversity.</p> <p>Please refer to paras 7.131 to 7.139 for consideration of Biodiversity Net Gain requirements.</p> <p>Please refer to paras 7.5 to 7.11 for consideration of the Alternative Sites Assessment.</p> <p>The Applicant Team has emphasised that all ecological assessments were carried out by suitably qualified ecologists in line with best practice. The Applicant maintained that the Environmental Statement is robust, proportionate and evidence-based, supported by extensive surveys, reasonable worst-case assumptions, and a management and monitoring framework enabling adaptive measures if required.</p> <p>Officers also note that the application has been independently reviewed by Arup on behalf of the Council, the Environment Agency (the statutory body responsible for protecting and regulating the environment) and Natural</p>
---	--

	<p>England (the statutory body responsible for nature conservation). Critically, the Environment Agency and Natural England have confirmed no objection subject to securing all necessary mitigation, enhancement, monitoring and long-term management measures.</p> <p>Please refer to the following conditions:</p> <p>Condition 15 - Mitigation, Enhancement and Management Plan</p> <p>Condition 41 - Operational Management and Activities Plan</p> <p>Condition 40 - Steering Group Establishment & Function</p> <p>Condition 55 - Monitoring, Reporting & Adaptive Management</p>
<p>Metropolitan Police (Secured by Design):</p> <p>No comments received.</p>	<p>N/A</p>
<p>Ministry of Defence (Dated February 2024):</p> <p>No safeguarding objections to the proposal.</p>	<p>The Ministry of Defence comments are noted and taken into consideration as part of the planning assessment.</p>
<p>National Air Traffic Services (Dated November 2023):</p> <p>No safeguarding objections to the proposal.</p>	<p>The National Air Traffic Services comments are noted and taken into consideration as part of the planning assessment.</p>
<p>National Highways (Dated December 2023):</p>	<p>The National Highways comments are noted and</p>

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

<p>There is no objection to the original proposal, as the development is expected to have no material impact on the Strategic Road Network because it relocates an existing facility and most vehicle movements are already taking place in the area. The approach to travel planning is viewed positively, particularly the emphasis on shared transport and reducing reliance on private cars through the site's proposed travel plan. Overall, the scheme is considered consistent with the National Planning Policy Framework objective of encouraging a shift toward more sustainable modes of transport.</p> <p>National Highways (Dated November 2025):</p> <p>Confirmation of no further comment regarding the amended proposal.</p>	<p>taken into consideration as part of the planning assessment.</p>
<p>Natural England (Dated December 2023):</p> <p>Natural England objected to the original proposal as it was considered to damage or destroy the designated features of the Mid Colne Valley SSSI, of which Broadwater Lake is an essential part. The proposal would cause the permanent and irreversible loss of SSSI habitats that cannot be mitigated, along with harm to breeding bird areas and winter roosting sites. There were also concerns about disturbance to wildlife and the wider natural environment during both construction and operation. Natural England further noted that the Assessment of Alternative Sites was insufficient and that the mitigation hierarchy had not been properly followed, with proposed enhancement measures unable to compensate for the direct loss of habitat within a protected site.</p> <p>Natural England (Dated January 2026):</p> <p>Natural England confirmed no objection to the amended scheme provided that appropriate mitigation is secured, noting that this does not mean the development is free from significant environmental impacts. They consider the</p>	<p>The Natural England comments are noted and taken into consideration as part of the planning assessment.</p> <p>Please refer to paras 7.21 to 7.51 for consideration of the impacts to the SSSI and Biodiversity.</p> <p>Please refer to paras 7.131 to 7.139 for consideration of Biodiversity Net Gain requirements.</p> <p>Please refer to paras 7.5 to 7.11 for consideration of the Alternative Sites Assessment.</p> <p>Please refer to the following conditions:</p> <p>Condition 15 - Mitigation, Enhancement and Management Plan</p>

<p>revised proposal capable of proceeding without causing unacceptable harm to the SSSI, acknowledging major design changes such as a reduced building footprint focused on existing hardstanding, a larger refuge and buffer area for birds, and updated ecological mitigation and long-term monitoring measures, all of which help lower the risk of lasting disturbance to SSSI features. Key issues remain, including ongoing harm to breeding bird sites and winter roosting areas, with Natural England advising that construction activities such as demolition and piling should be restricted to October–December rather than starting in September. They also require a more detailed Construction Environmental Management Plan and Monitoring & Management Plan. For land-based activities, they note inconsistencies in the submitted documents but welcome the removal of high-impact activities such as the zip line and big swing.</p>	<p>Condition 41 - Operational Management and Activities Plan</p> <p>Condition 40 - Steering Group Establishment & Function</p> <p>Condition 55 - Monitoring, Reporting & Adaptive Management</p>
<p>Royal Society for the Protection of Birds (RSPB) (Dated December 2023):</p> <p>RSPB objected to the original proposal as it was considered to cause significant harm to the Mid Colne Valley SSSI through the loss of important habitats and increased disturbance to sensitive bird species. The SSSI is designated for its wintering bird populations, diverse breeding bird assemblages across habitats such as open water, fen, damp grassland, scrub and woodland, and its areas of lowland calcareous grassland. The development would lead to the permanent loss of woodland, scrub and parts of the open water through land reclamation. It would also introduce greater levels of sailing, water sports and land based activities during the key April–September period, increasing disturbance to breeding birds as well as wintering and refuge dependent species that rely on Broadwater Lake’s open water and islands. Survey data from 2023 shows that birds are already affected by existing sailing activity, and Broadwater Lake functions as an essential refuge within the wider Colne Valley.</p>	<p>The RSPB comments are noted and taken into consideration as part of the planning assessment.</p> <p>Please refer to paras 7.21 to 7.51 for consideration of the impacts to the SSSI and Biodiversity.</p> <p>Please refer to paras 7.131 to 7.139 for consideration of Biodiversity Net Gain requirements.</p> <p>Please refer to paras 7.5 to 7.11 for consideration of the Alternative Sites Assessment.</p>

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

<p>The proposal is therefore considered to conflict with NPPF paragraph 193 (a), which requires refusal where significant biodiversity harm cannot be avoided, mitigated or compensated. The objector also notes that Broadwater Lake was previously ruled out during the HS2 examination due to ecological sensitivity, and the new scheme does not alter the basis for that conclusion.</p> <p>No comments have been received regarding the 2025 amended proposal.</p>	
<p>Royal Yachting Association (RYA) (Dated January 2026):</p> <p>RYA are supportive of the proposal in principle as it would provide a boating facility within Hillingdon. However, the conditions set out would limit the facilities ability to become a large-scale water sports centre, with proposed limitations on launching boats and restrictive views from the facility of the lake impacting safety. The operational viability and financial sustainability of the proposed conditions need to be reviewed.</p> <p>Royal Yachting Association (RYA) (Dated February 2026):</p> <p>The RYA has submitted a supplementary statement expressing its overall support for the proposal. The RYA notes that while it previously raised concerns regarding operational restrictions proposed for HOAC, subsequent engagement with the Applicant has provided reassurance that the operational framework has flexibility. The RYA emphasises that for the centre to function successfully, it must be able to operate in a way that is financially sustainable, adaptable to community demand, and compatible with long-term educational and recreational delivery, while ensuring that environmental protections remain proportionate and workable.</p>	<p>The Royal Yachting Association comments are noted and taken into consideration as part of the planning assessment.</p> <p>Please refer to paras 7.21 to 7.51 for consideration of the impacts to the SSSI and Biodiversity. Please refer to paras 7.5 to 7.51 for consideration of the operation and community benefits.</p> <p>Please refer to the following conditions:</p> <p>Condition 15 - Mitigation, Enhancement and Management Plan</p> <p>Condition 41 - Operational Management and Activities Plan</p> <p>Condition 40 - Steering Group Establishment & Function</p> <p>Condition 55 - Monitoring, Reporting & Adaptive Management</p>

<p>Sport England (Dated December 2023):</p> <p>Sport England raises no objection to the original proposal, considering it compatible with their Planning for Sport Principles. The scheme is viewed as protecting and supporting existing opportunities for sport and physical activity, and it aligns with national policy that allows appropriate outdoor sport facilities within the Green Belt. Sport England understands that the new Water Sports and Activity Centre would serve the needs of BSC, HOAC and potentially Broadwater Rowing Club. They advise that a planning condition should be included to secure a continuity plan so that both BSC and the Rowing Club can continue operating throughout the construction period.</p> <p>Sport England (Dated December 2025):</p> <p>Sport England raised no objection is raised to the amended application. Although the scheme has been reduced in scale in response to comments from other statutory consultees, leading to disappointment that some of its intended recreational and wellbeing benefits have been diminished, it is still considered capable of meeting the Planning for Sport Principles. Sport England again advises that a planning condition should be applied to safeguard the continuity of sailing and rowing activities throughout the construction period.</p>	<p>The Sport England comments are noted and taken into consideration as part of the planning assessment.</p> <p>Please refer to Condition 25 which secures the continuity of sports during construction.</p>
<p>Thames Water (Dated January 2026):</p> <p>There is no objection to the amended proposal, on the basis that the developer follows the sequential drainage hierarchy for managing surface water and complies with London Plan Policy SI 13 on sustainable drainage. It is confirmed that both the wastewater network and the sewage treatment works have adequate capacity to accommodate the development. However, the site lies within a Source Protection Zone, meaning the groundwater environment is</p>	<p>The Thames Water comments are noted and taken into consideration as part of the planning assessment.</p> <p>Managing surface water and compliance with London Plan Policy SI 13 is secured under Conditions 37 and 39.</p>

<p>particularly vulnerable, and the applicant is advised to follow the Environment Agency’s groundwater protection guidance and obtain specialist environmental advice, as some site activities may require regulatory control. Water supply to the development will be provided by Affinity Water, whose comments should also be taken into account.</p>	
<p>Three Rivers District Council (Dated January 2024):</p> <p>Three Rivers District Council raised concerns regarding impact on the SSSI, and they trust Hillingdon Council will take these impacts into account when determining this application</p> <p>Three Rivers District Council (Dated December 2025):</p> <p>No change from previous comments.</p>	<p>The Three Rivers District Council comments are noted and taken into consideration as part of the planning assessment.</p> <p>Please refer to paras 7.21 to 7.51 for consideration of the impacts to the SSSI and Biodiversity.</p> <p>Please refer to paras 7.131 to 7.139 for consideration of Biodiversity Net Gain requirements.</p> <p>Please refer to paras 7.5 to 7.11 for consideration of the Alternative Sites Assessment.</p>
<p>Transport for London (TfL) (Dated March 2026):</p> <p>TfL’s 2026 review acknowledges positive revisions, such as improved footway provision, a reduction to 42 parking spaces, six blue-badge bays, EV charging points, and clearer access arrangements, but raises outstanding issues. TfL emphasises that the Active Travel Zone (ATZ) assessment remains incomplete, as it still does not assess links to the Grand Union Canal, nearby public footpaths, or night-time movements, all of which are required to meet London Plan policy T1. Concerns also remain regarding lighting, wayfinding, overspill parking risks, the safety and surveillance of cycle parking, and the lack of a dedicated servicing bay. TfL notes that the updated trip generation still relies heavily</p>	<p>The Transport for London comments are noted and taken into consideration as part of the planning assessment.</p> <p>Please refer to paragraphs 7.168 to 7.188 for consideration of Transport. Specifically, the Highways Authority have carried out an assessment of active travel and have costed a contribution towards delivery of Healthy Streets and Active Travel Zone enhancements. The Canal and River Trust have also identified a project for</p>

<p>on car travel and does not demonstrate progress toward the Mayor’s mode-shift targets, with no clear consideration of a shuttle service. Finally, TfL identifies gaps in the Travel Plan, most importantly, the absence of SMART targets or clear strategies to reduce car use and promote active travel, meaning further work is required before the scheme can be considered fully compliant with strategic transport policy.</p>	<p>towpath enhancements and a proportionate contribution has been agreed. A £177,800 contribution towards such measures is proposed to be secured under UU HoT ii.</p> <p>The Moorhall Road highway works will be secured via a S278 highways agreement as per UU HoT iv.</p> <p>Final details of the lighting strategy are proposed to be secured under Conditions 46.</p> <p>A wayfinding strategy is proposed to be secured by Condition 47.</p> <p>Concerns regarding parking are proposed to be addressed through the final details to be secured under Condition 48 for a Parking Design and Management Plan.</p> <p>Condition 31 (Ancillary Structures and Public Realm Details) is proposed to secure a dedicated servicing bay, including re-locating the cycle store closer to the main buildings.</p> <p>A final comprehensive Travel Plan is proposed to be secured by Condition 50.</p>
Internal Consultation	
<p>Access Officer (Dated December 2025):</p> <p>The revised application has addressed most previous accessibility concerns, but approval must include conditions ensuring the scheme provides safe and inclusive access and</p>	<p>The Access Officer comments are noted and taken into consideration as part of the planning assessment.</p>

<p>evacuation for all users, including those unable to use stairs.</p> <p>Conditions required to secure acceptable detail of the accessible entrances and the fire evacuation lifts.</p>	<p>Please refer to paras 7.100 to 7.101 for consideration of inclusive access provisions.</p> <p>Please refer to Condition 33 which secures final details of inclusive access provisions.</p>
<p>Air Quality Officer (Dated November 2025):</p> <p>There are no constraints identified. The application site is outside the LBH AQMA and outside the catchment area of any identified Focus Area. Given the trip generation reported in the TA, the proposed development is Air Quality Neutral and no further mitigation is deemed necessary during the operation of the site, other than the effective implementation of the proposed Travel Plan.</p> <p>During the construction phase, the appropriate risk mitigation measures for a Low Risk site during demolition, construction and track out, and for a Medium Risk during earthworks, must be deployed in line with GLA's SPG on The Control of Dust and Emissions During Construction and Demolition (GLA, 2014). These measures should be written into a Dust Management Plan (DMP).</p>	<p>The Air Quality Officer comments are noted and taken into consideration as part of the planning assessment.</p> <p>Please refer to paras 7.122 to 7.123 for consideration of air quality.</p> <p>Please refer to Conditions 8 and 16.</p>
<p>Arup (Third Party Environmental Impact Assessment Consultants):</p> <p>The Environmental Statement (ES) submitted in support of the revised 2025 scheme for the Hillingdon Water Sports Facility and Activity Centre at Broadwater Lake has undergone a comprehensive independent review. The review concludes that the updated ES is substantially improved, technically robust, and generally compliant with the requirements of the Environmental Impact Assessment Regulations.</p> <p>Ecology remains the most sensitive and critical topic area due to the site's location within the Mid Colne Valley SSSI. The Applicant has provided substantial new survey</p>	<p>Arup comments are noted and taken into consideration as part of the planning assessment.</p> <p>Please refer to the following sections of the report:</p> <p>Water Resources at paras 7.154 to 7.160</p> <p>Flood Risk at paras 7.82 to 7.86 and 7.140 to 7.150</p> <p>Land Contamination at paras 7.161 to 7.164</p>

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

<p>data (2022–2025), resulting in a much more robust baseline and impact assessment. The scaled-back scheme reduces potential effects, and Natural England has indicated that it no longer maintains fundamental objections, provided a strong monitoring and adaptive management regime is secured.</p> <p>Key issues requiring planning conditions include:</p> <ul style="list-style-type: none"> - A long-term, flexible Ecological Management & Monitoring Plan, with clear adaptive measures. - Ongoing coordination with HS2 to ensure alignment of ecological mitigation and monitoring. <p>The Biodiversity Net Gain (BNG) assessment is generally well-founded but may slightly overstate habitat gains, and recalculation may bring the gain below 10%, triggering a need for additional compensation. A Biodiversity Gain Plan will therefore be essential.</p> <p>Water Resources & Flood Risk:</p> <p>The 2025 ES greatly improves the description of baseline hydrology and drainage. The reduced dredging and land reclamation strategy means no loss of lake storage, although updated flood modelling using the October 2025 Upper Colne model is expected to be required to satisfy the Environment Agency. Surface water drainage and lake-related construction impacts will need to be controlled through a detailed CEMP and drainage strategy secured by condition.</p> <p>Ground Conditions & Contamination:</p> <p>Additional investigations have strengthened the contamination baseline; however, further intrusive ground investigation and an updated ground gas risk assessment will be required post-permission. These matters can be fully addressed through standard planning conditions requiring a remediation strategy</p>	<p>Landscape and Visual Impact at paras 7.91 to 7.99</p> <p>Sustainability at paras 7.189 to 7.202</p> <p>Conditions are proposed for the following:</p> <p>Condition 35 – Biodiversity Net Gain</p> <p>Condition 43 - Energy strategy, including monitoring, recording and reporting plans.</p> <p>Conditions 37, 38 and 39 are proposed to secure further details on the water cycle and drainage strategy.</p> <p>UU HoT iii is proposed to secure a carbon offset contribution and be seen monitoring requirements.</p>
--	---

and verification reporting. Residual risks are manageable.

Landscape & Visual Impact:

The updated Landscape and Visual Impact Assessment (LVIA) is now methodologically sound and aligned with GLVIA3, following significant clarifications. The assessment demonstrates that, once planting matures, the scheme will result in negligible to minor beneficial landscape effects, with some moderate long-term benefits. Short-term visual effects are localised and reduce over time, with no significant residual impacts.

Energy & Climate Requirements:

The Energy Statement demonstrates compliance with Part L (2021) and London Plan SI policies, with CO₂ savings above the 35% threshold and fully modelled overheating and operational energy performance. The carbon offset requirement (£42,821) has been confirmed, and the mandatory GLA energy reporting spreadsheet has been submitted.

Overall Conclusion:

The 2025 ES provides the Council with a robust evidence base on which to assess the application. While some detailed designs and investigations must be secured through conditions, particularly for biodiversity, flood risk, ground gas, and drainage, the review finds no outstanding environmental constraints that would prevent the scheme from being approved, provided appropriate conditions and monitoring mechanisms are attached.

The scheme is therefore capable of being supported in environmental terms, subject to the successful securing of the required mitigation, monitoring, and compliance controls.

Contaminated Land Officer (Dated January 2026):

The Contaminated Land Officer comments are noted

<p>No objection to the application. A planning condition is recommended given the need for further investigation as stated in the submitted Phase II Geotechnical and Geo – Environmental Report September 2023.</p>	<p>and taken into consideration as part of the planning assessment.</p> <p>Condition 19 is proposed to be secured.</p>
<p>Economic Development Officer:</p> <p>A construction training scheme contribution should be secured as per the requirements of the Planning Obligations SPD. The payment in lieu equals £66,736.</p>	<p>The Economic Development Officer comments are noted.</p> <p>Please refer to UU HoT v.</p>
<p>Flood and Water Management Specialist (Metis):</p> <p>No objection subject to conditions requiring final details of the drainage scheme.</p>	<p>The Flood and Water Management Specialist comments are noted and taken into consideration as part of the planning assessment.</p> <p>Conditions 37, 38 and 39 are proposed to secure further details on the water cycle and drainage strategy.</p>
<p>Highways Authority (Dated January 2024):</p> <p>The Highway Authority raises no objections to the proposed Hillingdon Watersports Facility and Activity Centre, subject to required conditions and legal agreements. The development replaces HOAC, with most users arriving by coach or minibus, resulting in low peak-hour traffic impacts.</p> <p>Access will continue from Moorhall Road, with the Boyers Pit junction remodelled to improve safety and accommodate larger vehicles. The site layout provides compliant parking, EV charging and blue-badge spaces, though full details must be secured through a Parking Design and Management Plan. Swept-path analysis confirms safe manoeuvring for coaches, refuse trucks and emergency vehicles.</p> <p>An Active Travel contribution of £37,800 is required for dropped kerbs, tactile paving and</p>	<p>The Highways Authority comments are noted and taken into consideration as part of the planning assessment.</p> <p>Please refer to 7.168 to 7.188 for consideration of transport matters.</p> <p>The detail of cycle parking is proposed to be secured under Conditions 31 and 34.</p> <p>A Delivery & Servicing Plan is to be secured for each phase, under Condition 49.</p> <p>A Construction Logistics Plan is to be secured under Condition 17.</p>

<p>benches to support pedestrian access. A Construction Logistics Plan, Delivery and Servicing Plan, Travel Plan, and Section 278 works must be secured by condition and legal agreement.</p> <p>Subject to these measures, the proposal is considered acceptable in transport and highway terms.</p>	<p>A Parking Design and Management Plan is to be secured under Condition 48.</p> <p>A travel plan is to be secured under Condition 50.</p> <p>The Moorhall Road highway works will be secured via a S278 highways agreement as per UU HoT iv. A contribution towards active travel zone measures and healthy streets is also proposed to be secured under UU HoT ii.</p>
<p>Noise Specialist (Dated November 2023):</p> <p>Outdoor sports and leisure activity may cause disturbance, but regulating such noise through planning conditions is difficult. If conditions are imposed, they should relate to operating hours. Any future noise complaints can be investigated under the Environmental Protection Act 1990.</p> <p>Demolition and construction may disturb nearby occupiers. The Council should use its Section 60 powers (Control of Pollution Act 1974) and refer to BS5228 to control noise and vibration impacts.</p> <p>Noise from existing and future sources (including HS2 trains) is unlikely to significantly impact users of the development.</p> <p>Noise Specialist (Dated December 2025):</p> <p>Based on the information provided I consider it unlikely that an adverse noise impact would be caused by the operation of the proposed development.</p> <p>I would recommend that a construction environmental management plan is submitted to the council for approval prior to construction, including an updated assessment of construction noise and</p>	<p>The Noise Specialist comments are noted and taken into consideration as part of the planning assessment.</p> <p>Matters relating to noise are addressed in paras 7.119 to 7.121 of the report.</p> <p>Please also refer to Conditions 6, 14 and 16.</p>

<p>vibration including details of mitigation to be used.</p>	
<p>Planning Policy Officer (Dated February 2024):</p> <p>The proposal is considered to be excessive in scale for a relocation scheme, with the need for two storey buildings not justified among other concerns.</p> <p>The openness of the Green Belt would be harmed, with current justification not demonstrating that harm is outweighed or that there are Very Special Circumstances for the proposal.</p> <p>SSSI protection policies set a high bar, with the requirement to avoid significant harm, not just mitigate.</p> <p>The Alternative Sites Assessment (ASA) raises some doubts. The potential to split the land and water activities onto separate sites should be explored.</p> <p>The Seasonal worker accommodation would need to be conditioned to seasonal use only.</p> <p>Planning Policy Officer (Dated January 2026):</p> <p>The Broadwater Lake proposals sit within a highly constrained policy context, including Green Belt, the Mid Colne Valley SSSI and SINCR, and the Colne Valley Regional Park. The applicant argues the site qualifies as ‘grey belt’, but officers note that the land does not meet the NPPF definition of previously developed land, and that its SSSI and flood-risk designations trigger Footnote 7 constraints, weakening the grey-belt case.</p> <p>The application requires Very Special Circumstances. The Planning Statement presents a strong social benefits case, especially improved access to outdoor recreation for young people and people with</p>	<p>The Planning Policy Officers comments are noted and taken into consideration as part of the planning assessment.</p> <p>Please refer to paras 7.21 to 7.51 for consideration of the impacts to the SSSI and Biodiversity.</p> <p>Please refer to paras 7.5 to 7.11 for consideration of the Alternative Sites Assessment.</p> <p>Please refer to paras 7.52 to 7.81 for consideration of Green Belt.</p> <p>On the basis that HOAC occupies the proposed development, as proposed to be secured under UU HoT i, Officers do not dispute the conclusion of the ASA. Subject to a suitably worded legal agreement, it is accepted that Broadwater Lake is the only available, suitable and deliverable site, and that no suitable alternative site exists with fewer environmental impacts.</p>

<p>disabilities, though economic and environmental benefits remain limited.</p> <p>The updated Alternative Sites Assessment reaffirms the applicant's view that no feasible alternative exists; however, officers identify issues with the scoring system and a lack of explicit consideration of ecological and landscape impacts at Broadwater Lake. Additional clarity, including viability evidence for Denham Quarry, is recommended. While the site's constraints are significant, officers recognise that the social benefits could outweigh harm if evidenced robustly, but further justification is needed before concluding that the proposal fully satisfies national and local policy requirements.</p>	
<p>Urban Design Officer Comments (Dated December 2025):</p> <p>The Broadwater Lake site is a high-sensitivity Green Belt and SSSI location, requiring careful control of visual, spatial and ecological impacts. While the proposal generally respects the landscape by concentrating development on existing hardstanding and minimising tree loss, several aspects of the scheme still require refinement to reduce harm to openness.</p> <p>The increased built footprint is justified by modern accessibility and regulatory needs, but some buildings, particularly the Operations Building roof form, Camping Zone structure, and Anglers' huts, remain overly bulky. Officers recommend exploring reduced massing and flat/green roofs to better integrate the scheme into the rural setting.</p> <p>Materials also need improvement: the use of standing-seam cladding on walls creates a commercial appearance inconsistent with the site context. A more rural palette such as flint, timber or clay tiles is advised, with consistent treatment for smaller ancillary buildings.</p>	<p>The Urban Design Officers comments are noted and taken into consideration as part of the planning assessment.</p> <p>Matters relating to design are addressed in paras 7.91 to 7.105 of the report.</p> <p>The final design details of development, including materials and landscape scheme details, are proposed to be secured by Conditions 27, 28, 29, 30, 31, and 34.</p>

<p>The layout is generally strong, with pedestrian-focused spaces and activities kept to the north. Minor adjustments are recommended to the coach arrival area, Anglers' store location, and hard surfacing around the Camping Zone. Further detail is required on landscape elements, boundary treatments, and lighting to ensure ecological sensitivity is maintained.</p> <p>Overall, the scheme is progressing positively but needs targeted reductions in massing, refined materials, and additional technical details to be fully supported on urban design and landscape grounds.</p>	
<p>Waste Strategy Officer (Dated February 2024):</p> <p>Need to ensure adequate waste capacity with an even 50/50 split between residual waste & recycling. Accessibility needs to be demonstrated.</p> <p>Waste Strategy Officer (Dated November 2025):</p> <p>No comments/objections to the amended proposal.</p>	<p>The Waste Strategy Officer comments are noted and taken into consideration as part of the planning assessment.</p>

7 Planning Assessment

Land Use Principles

Background

- 7.1 The former HOAC facility at Dews Lane, owned by Hillingdon Council, lies directly on the HS2 route and was compulsorily acquired under the High-Speed Rail (London–West Midlands) Act 2017. As a result, the centre closed in October 2020, with HS2 Ltd taking full possession of the site. Construction of the Colne Valley Viaduct requires both temporary and permanent safety buffer zones, alongside long-term HS2 access and maintenance rights. The viaduct structure itself also compromises the lake's suitability for sailing. These permanent physical, operational and safety constraints mean that the land and waterbody cannot return to use as an outdoor activity centre, regardless of the eventual hand-back of part of the site.

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

- 7.2 A legal agreement was therefore entered into in August 2017 between HS2 Ltd, the Secretary of State for Transport and the London Borough of Hillingdon, requiring the Council to use reasonable endeavours to relocate the HOAC facility within an agreed funding cap of £26.5 million. While New Denham Quarry was initially identified as a potentially suitable location, the cost of redevelopment would far exceed the agreed funding limit, ruling it out and necessitating the continued search for an alternative site.
- 7.3 Although the former HOAC buildings were outdated and did not meet modern standards or accessibility requirements, this was not the driving factor behind the loss of the facility. The determining issue is the permanent impact of HS2, particularly the safety zones, operational requirements, long-term access rights and loss of tranquillity essential to HOAC's work with children and SEN users. This position has been accepted by HS2 Ltd, LB Hillingdon and Parliament, underpinning the commitment to relocation rather than any attempt to reuse the Dews Lane site.
- 7.4 A summary timeline of events is set out below:

2013–2014: HS2 route announced; HOAC at risk

- Nov 2013 – HS2 Bill is published. The route bisects the HOAC site, and the HS2 Environmental Statement predicts major visual and noise impacts, making continued operation unlikely during the 5-year construction period.
- Apr–May 2014 – HOAC formally petitions Parliament, stating the facility cannot operate under HS2 construction and requesting relocation, identifying Broadwater Lake as the only suitable site.

2015–2016: Parliamentary review & Denham Quarry option

- Mar 2015 – Commons Select Committee supports finding a compromise to allow HOAC to continue elsewhere.
- Feb–Mar 2016 – Denham Quarry (Summerleaze Lake) identified as a potential relocation site. HS2 acknowledges community importance but insists on cost control.
- Jun 2016 – Planning application submitted to Buckinghamshire for HOAC relocation to Denham Quarry.
- Oct 2016 – Relocation becomes unviable due to £55m cost, far exceeding the agreed £26.5m cap. Funding complications arise if HOAC leaves Hillingdon.

2016–2017: Funding agreement and legal framework

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

- Dec 2016 – House of Lords confirms HS2 will contribute £26.5m toward HOAC's relocation or mitigation.
- Feb 2017 – HS2 Act receives Royal Assent.
- Aug 2017 – Formal legal agreement signed between HS2 Ltd, Secretary of State, and LB Hillingdon, requiring relocation within 3 years (later extended) and capping funding at £26.5m.

2017–2020: Planning and closure

- Mar 2017 – Denham Quarry relocation approved by Buckinghamshire Council, deemed suitable in planning terms.
- Sep–Dec 2017 – Costs rise again; LBH allocates funds (£250k) to explore relocation.
- Oct 2020 – Former HOAC facility closes due to HS2 construction and safety zone requirements.

2022–2024: Broadwater Lake selected; planning application progresses

- Jun 2022 – LBH Cabinet approves Broadwater Lake as the new site and authorises land purchase; other sites ruled out as unfeasible.
- Oct 2023 – Full planning application submitted for the new Hillingdon Water Sports and Activity Centre (ref. 2382/APP/2023/2906).
- Apr 2024 – HS2 legal agreement is extended to Jan 2026 to give more time for relocation.
- Apr 2024 onward – Revised scheme prepared, reducing scale following statutory consultee feedback.
- Nov 2025 – Revised application plans and documents formally submitted.

Alternative Sites Assessment

- 7.5 The Alternative Sites Assessment (ASA) confirms that a comprehensive search for a replacement HOAC facility was undertaken within a 20-kilometre radius of the former Dews Lane site, reflecting the catchment of existing users and the operational needs of schools, SEN groups and youth organisations. Sites were tested against staged criteria covering minimum lake and land area, accessibility, safeguarding and security, environmental constraints, and deliverability. Five sites were shortlisted: Broadwater Lake, Ruislip Lido, Bury Lake, Aldenham Reservoir and Denham Quarry (Summerleaze Lake). The assessment of these sites is summarised in Table 7 below.

Table 7. Summary of Shortlisted Alternative Sites

Site	Assessment
Ruislip Lido	<ul style="list-style-type: none"> - Publicly accessible and cannot be fully secured, creating safeguarding risks; - Insufficient and inconsistent lake depth for sailing; - Water-quality issues including parasites that prevent swimming; - Flood risk; - Presence of public rights of way around the lake; - Contamination and historic structures within the waterbody; and - Requires extensive engineering works and still fail operational requirements.
Bury Lake	<ul style="list-style-type: none"> - Public access and rights of way prevent secure operation; - Asbestos contamination in surrounding land poses unacceptable risk to land-based activities and groundworks; - Competing existing water-sport users; and - Safeguarding and deliverability issues.
Aldenham Reservoir	<ul style="list-style-type: none"> - Lake depth insufficient for sailing, noting that sailing use has already ceased due to low water levels; - Publicly accessible with multiple rights of way preventing safeguarding; - Uncertainty over future water levels and dam repairs.
Denham Quarry (Summerleaze Lake)	<ul style="list-style-type: none"> - Physically suitable and previously approved for relocation, but delivery cost would significantly exceed the £26.5 million HS2 funding cap; - No additional funding available, rendering the site financially undeliverable.
Broadwater Lake	<ul style="list-style-type: none"> - Only site that meets minimum land and water requirements; - Can be secured and safeguarded, - Deliverable within funding constraints,

	<ul style="list-style-type: none"> - Can operate with mitigation within the SSSI; - No less harmful or viable alternative identified.
--	---

- 7.6 The ASA concludes that Ruislip Lido, Bury Lake and Aldenham Reservoir are unsuitable due to combinations of inadequate lake depth for sailing, public access and safeguarding constraints, contamination and water-quality risks, flood risk and the presence of public rights of way. Denham Quarry was found to be physically suitable and previously approved but was discounted as unviable because the cost of delivery would significantly exceed the £26.5 million funding cap set by the HS2 legal agreement. The Assessment therefore concludes that Broadwater Lake is the only available, suitable and deliverable site, and that no suitable alternative site exists with fewer environmental impacts.
- 7.7 The ASA has been consulted on, robustly scrutinised by members of the public, statutory consultees, internal consultees and has been amended and clarified in response to comments received. The updated ASA maintains that all land-based and water-based activities must remain together on a single site and rules out disaggregation. It is explained that a single-site replacement facility is the only safe, inclusive, operationally viable and financially deliverable option. Multi-site alternatives cannot meet safeguarding, accessibility, operational, or environmental requirements. This means the shortlist of alternative locations remains unchanged.
- 7.8 The updated ASA scoring methodology has been explained, noting that Section 8 of the ASA sets out the scoring methodology using a Red, Amber, Green (RAG) framework. This system assesses the degree of difficulty in overcoming site constraints through mitigation or design, rather than ranking constraints against each other. The ASA states that this criterion requires that development will not have a significant impact on the SSSI. Broadwater Lake scored '0' under this criterion because ecological specialists had previously advised that the development would not result in significant impacts on the SSSI or sensitive ecological areas, particularly if disturbance is focused within the south-east corner of the Site. This conclusion has since been substantiated in the submitted Environmental Statement and Natural England's formal confirmation of no objection, subject to appropriate mitigation being secured.
- 7.9 Regarding the viability of Denham Quarry as an alternative site, it has been demonstrated why the site is not financially viable. This is evidenced in a publicly available report prepared by HS2 (and submitted as part of the Response to the Hillingdon Council's Planning Policy comments) which confirms that the estimated relocation cost of the former HOAC facility to New Denham Quarry would cost £55.1 million. The report includes a letter from the Secretary of State (dated October 2016) confirming the decision not to pursue the relocation of the former HOAC facility to New Denham Quarry. The letter states:

"...the expected cost of the Denham Quarry site, including optimism bias, is now £55.1m. This means there is a very real prospect of a significant expenditure of

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

public money on relocation that will result in HOAC facing severe operating difficulties or failing to operate.

...For these reasons I have with regret decided we cannot pursue the Denham Quarry option further...”.

Temporary Operation at Troy Lake:

- 7.10 HOAC is operating only a highly reduced, temporary programme from Troy Lake during the 2025 Easter and Summer school holidays, consisting solely of kayaking and dinghy sailing for around 20 children per day, with no term-time activities and no services for schools, colleges, youth organisations, adults or community groups, a drastic reduction compared with historic activity levels at the former HOAC site. This temporary arrangement is permitted by Rickmansworth Sailing Club to keep HOAC’s two remaining staff employed while a permanent site is sought. Troy Lake cannot support full operations due to its small site area (under two hectares), insufficient facilities (only two toilets, one shower, limited storage, no camping space) and the need to share space with RSC, meaning it is not viable as a medium- or long-term home for HOAC.

Alternative Sites Assessment Conclusion:

- 7.11 On the basis that HOAC occupies the proposed development, as proposed to be secured under Unilateral Undertaking (UU) HoT i, Officers do not dispute the conclusion of the ASA. Subject to a suitably worded legal agreement, it is accepted that Broadwater Lake is the only available, suitable and deliverable site, and that no suitable alternative site exists with fewer environmental impacts.

Visitor, Community, Recreation and Sport Facility

- 7.12 National and local planning policy places strong emphasis on delivering healthy, inclusive, safe and well-connected communities, with planning decisions expected to promote social interaction, community cohesion, and access to high-quality facilities that support physical and mental wellbeing. The NPPF (2024) requires development to provide safe, accessible environments that encourage everyday activity, reduce health inequalities, and safeguard valued community, recreational and cultural facilities while supporting their modernisation and continued use. It also recognises the importance of high-quality open spaces and opportunities for sport and physical activity in improving health, supporting nature and contributing to climate-change objectives.
- 7.13 These principles are reinforced by policies GG1-GG3, S1, S5, D1-D5, G4 and G6 of the London Plan (2021), which defines good growth as inclusive growth and seeks access to well-designed community spaces, with sports and recreation facilities expected to be accessible, well-connected, capable of multiple and shared use, and supportive of extended participation where impacts can be appropriately managed.

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

- 7.14 At borough level, Policies DMCI 1 and DMCI 2 of the Hillingdon Local Plan: Part 2 (2020) prioritise the retention, enhancement and replacement of community infrastructure, resisting unnecessary loss, encouraging multi-purpose and co-located facilities, and requiring new provision to be inclusive, flexible, accessible and located within the communities they serve, ensuring community access and no net loss of social infrastructure.
- 7.15 Policy DME 4 of the Hillingdon Local Plan: Part 2 (2020) supports proposals that enhance the Borough's visitor attractions, including heritage and other recreational sites, provided they do not negatively affect neighbouring land uses. This includes avoiding harm from noise, traffic, congestion, visual intrusion, safety risks, or loss of privacy and amenity. Developments must also ensure sustainable transport access with adequate on-site parking, improve the site's environmental qualities, and deliver high-quality design. Proposals should respect local architectural character, enhance environmental, historic or cultural features, and ensure inclusive access for all users.
- 7.16 The development is considered to have significant social, community and public benefits. More specifically, the proposal reinstates a much-valued facility used by schools, colleges, SEN groups, scouts, guides, cadets, families, Broadwater Sailing Club, and local emergency services. It provides year-round, accessible land and water-based activities, tailored support for disabled users, and dedicated provision for Pupil Referral Units (PRU) students and vulnerable young people. Evidence from Natural England, Defra and educational bodies demonstrates significant mental-health, physical-health, behavioural and educational benefits derived from outdoor learning and nature-based activity, all of which the new facility is designed to maximise.
- 7.17 Whilst the scheme has been reduced in scale in response to comments from other statutory consultees, leading to some disappointment that some of its intended recreational and wellbeing benefits have been diminished, it is still considered capable of meeting the Planning for Sport Principles. As per the comments received from Sport England, Condition 25 is proposed to safeguard the continuity of sailing and rowing activities throughout the construction period.
- 7.18 It is clear from the application submission that the development has been designed so that Hillingdon Outdoor Activity Centre (HOAC) and Broadwater Sailing Club (BSC) will occupy the development. Both parties were consulted during the application and both submitted representations. The concerns raised by these parties are summarised below:
- HOAC support the scheme in principle but raised concerns regarding the proposed operational restrictions, particularly the strict limits on water-user numbers and the confining of activities to the narrow Eastern Channel.
 - BSC support the scheme in principle but raised concerns regarding the reduction in the size of the facilities and sailing area proposed, the safety

of limited sightlines, wind obstruction to sailing conditions and car parking provision.

7.19 Following further consultation between the Applicant, HOAC and Broadwater Sailing Club, further representations were submitted. The further comments received are summarised below:

- HOAC reiterated their support for the scheme. Following further meetings with the Applicant team, they wish for the application to be approved so that the centre can relocate to Broadwater Lake. They explain that although earlier design comments were not fully reflected in the plans, they now understand this was due to ecological constraints and the need for high safeguarding standards for children and vulnerable users. They also acknowledge that the ecological mitigation strategy is highly complex and dictated by planning legislation, meaning the design had limited flexibility. The Applicant has agreed to develop the Operational Management and Activities Plan (Condition 41) in consultation with HOAC. HOAC confirms it has no objection to the principle of the development, supports the application, and commits to occupying the facility should permission be granted.
- BSC clarified that its earlier letter was intended as a comment, not an objection. After meeting with the Applicant, the club understands the ecological constraints shaping the new facility and why both HOAC and BSC cannot operate on opposite sides of the lake as Natural England will not permit both to operate simultaneously due to potential wildlife disturbance. The Applicant has agreed to develop the Operational Management and Activities Plan (Condition 41) in consultation with BSC. BSC supports the principle of the relocation and intends to occupy if permission is granted.

7.20 Whilst concerns were initially raised by HOAC and BSC regarding the proposals, it is clear that the scheme has been designed to balance both operational requirements alongside the ecological and environmental sensitivities. The Applicant has agreed that both parties will be consulted on the Operational Management and Activities Plan which is proposed to be secured under Condition 41. Subject to this condition, both HOAC and BSC have confirmed their intention to occupy and operate from the site. Subject to UU HoT i, which requires that no development occurs until HOAC and BSC have entered a long-term lease to occupy and operate from the site, Officers agree that the development can be attributed significant weight for social, community and public benefits.

Mid Colne Valley Site of Special Scientific Interest (SSSI) and Biodiversity

Planning Policy:

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

- 7.21 When assessing impacts on Sites of Special Scientific Interest (SSSIs) and biodiversity, the development plan establishes a clear and robust protective framework. Policy DMEI 7 of the Hillingdon Local Plan: Part 2 (2020) requires development to avoid significant harm to SSSIs, Sites of Importance for Nature Conservation, priority habitats and species, applying a strict mitigation hierarchy of avoidance, mitigation and, only where unavoidable, compensation, with refusal where unacceptable harm cannot be resolved. This is supported at the strategic level by Policy EM7 of the Hillingdon Local Plan: Part 1 (2012), which safeguards designated and non-designated biodiversity and geological assets, treats SSSIs as irreplaceable, and requires development to protect ecological networks, wildlife corridors and the objectives of the Biodiversity Action Plan.
- 7.22 At the regional level, Policy G6 of the London Plan (2021) reinforces these protections by affording SSSIs the highest level of policy protection, requiring development to demonstrate no adverse effect on their integrity, to deliver no net loss and, where possible, measurable biodiversity net gain, and to integrate biodiversity enhancement and access to nature into design. Collectively, these policies require a precautionary approach in which SSSI protection is paramount, ecological harm must be clearly justified and robustly mitigated, and biodiversity enhancement is a core consideration in all development decisions.
- 7.23 Collectively, these policies give local and regional effect to national planning policy, aligning with the NPPF (2024), which requires planning decisions to conserve and enhance biodiversity, provide strong protection for designated sites such as SSSIs, and refuse development where significant harm to biodiversity cannot be avoided, mitigated or compensated. This is discussed in greater detail below.

Context:

- 7.24 The application site forms part of the Mid Colne Valley SSSI and has done so since being notified by Natural England as a SSSI under the Wildlife and Countryside Act (1981) in 1985. The site also forms part of the Denham Quarry and Pits Nature Conservation Site of Metropolitan or Borough Grade I Importance (SINC).
- 7.25 The Mid Colne Valley SSSI is made up of four sites; Coppermill Down, Harefield Lake and Korda Lake, Tilehouse South and Broadwater Lake. Broadwater Lake is the largest of the lakes within the SSSI and therefore an integral component of the whole SSSI. Broadwater Lake is an important site for birds as it acts as a refuge from disturbance arising at Broadwater Lake itself or from other waterbodies in the vicinity. The full list of the interest features for which Mid Colne Valley SSSI has been designated include the following:
- Aggregations of non-breeding birds - Tufted duck, *Aythya fuligula*
 - Aggregations of non-breeding birds - variety of wintering species
 - Assemblages of breeding birds - Mixed: Lowland open waters and their margins, Lowland fen and Lowland damp grassland
 - Assemblages of breeding birds - Mixed: Scrub, Woodland

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

- Assemblages of breeding birds - variety of species
- Lowland calcareous grassland (CG3-5)

Representation received from Natural England:

- 7.26 Natural England are the statutory body responsible for nature conservation and are the body that has notified Broadwater Lake as a SSSI. Natural England have advised that, without a full mitigation package, the proposal would damage or destroy the notified features of the Mid Colne Valley SSSI, particularly the assemblages of breeding and non-breeding wetland birds for which the site is designated. Natural England highlighted the sensitivity of the lake to disturbance, noting that recent monitoring shows peak numbers of moulting tufted ducks occur in August and September, meaning that unmitigated construction activity at this time could lead to significant ecological harm. They also identified risks arising from high-disturbance land-based activities, such as zip lines and large swings. It should be noted that the high zip line and the big swing were removed from the proposals following submission of amended plans.
- 7.27 Natural England raised concerns regarding the adequacy of construction and operational management. The outline Construction Environmental Management Plan was considered to lack detailed provisions for ecological monitoring and adaptive mitigation, creating a risk that construction-phase impacts could exceed acceptable levels if not properly controlled. They also identified risks linked to the long-term management of the site, stating that the Mitigation, Enhancement and Management Plan require additional clarity on SSSI-specific mitigation, measurable restoration targets, and mechanisms to halt activities shown to be harmful. Governance arrangements are required to ensure timely decision making in response to monitoring results. Without these strengthened safeguards and controls, Natural England considers there to be a material risk of ongoing or cumulative adverse impacts on the SSSI's interest features.
- 7.28 Significantly, Natural England confirmed that they do not object to the proposed development, subject to appropriate mitigation being secured through planning conditions. Natural England has worked with the Applicant to develop a comprehensive package of mitigation, enhancement, monitoring and long-term management measures, principally set out within the Outline Mitigation, Enhancement and Management Plan. Natural England did caveat that a lack of objection does not mean that there are no significant environmental impacts. Officers have consulted all relevant bodies and considered all relevant impacts accordingly.

Representation received from the Environment Agency (EA):

- 7.29 The EA, as the statutory body responsible for protecting and improving the environment, initially objected to the proposals on biodiversity grounds due to risks of ecological deterioration at Broadwater Lake. They considered the development likely to harm the lake's Water Framework Directive (WFD) status through dredging, loss of shoreline variation, increased bank erosion and reliance on

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

artificial features such as floating reedbeds and concrete planters, which they argued would not replicate natural shallow-water habitat. They also found the Applicant had not adequately committed to restoring eroded banks or naturalising lake edges, meaning the scheme did not yet demonstrate it could avoid ecological deterioration or support the lake in achieving Good Ecological Potential. Further, the EA identified insufficient assessment of protected species, including incomplete or out-of-season surveys for Water Vole and inadequate mitigation planning for European Eel, leaving key risks unaddressed.

- 7.30 In response, the Applicant submitted a Water Framework Directive (WFD) Addendum and an Ecology Technical Note, arguing that Broadwater Lake is an artificial, steep-sided gravel pit with very limited existing ecological function, and that the development's effects are localised, reversible, and balanced by secured enhancements. These include creation of the lake's first gently-sloping shallow margin, restoration of degraded shorelines, removal of redundant structures, targeted marginal planting, rotational shoreline management and island-edge improvements, all formalised within the Mitigation, Enhancement and Management Plan (MEMP), CEMP and Operational Management and Activities Plan. For protected species, the Applicant consolidated three years of surveys showing no Water Vole evidence and largely unsuitable habitat, committing to precautionary checks and future habitat improvement through the MEMP. For European Eel, they argued that dredging impacts are minor and offset by new refuges, shallow margins and long-term eel-specific management. They concluded the proposals would not harm protected species or cause deterioration and would instead deliver a net improvement in ecological function over time.
- 7.31 The Council has received confirmation from the EA that the further information submitted has resolved their objections. Subject to Conditions 15, 16, 18, 19, 20, 21, 22, 23, 24, 36, 40, 41, and 55, the EA have confirmed that they do not object to the proposal on biodiversity grounds.

Representation received from Herts and Middlesex Wildlife Trust:

- 7.32 The Herts and Middlesex Wildlife Trust strongly objected to the revised proposal, arguing that despite reductions in scale, the development would still cause significant and irreversible harm to the Mid Colne Valley SSSI through disturbance to waterbirds during critical breeding, moulting and wintering periods, deterioration of water quality, and negative impacts on bats and the nationally important European eel population. The Trust also considers the Applicant's ecological assessment to underplay key impacts, the proposed mitigation to be inadequate or unworkable, and the Alternative Sites Assessment to be flawed in its treatment of designated sites.
- 7.33 The Applicant Team submitted a response document to the Herts and Middlesex Wildlife Trust and emphasised that all ecological assessments were carried out by suitably qualified ecologists in line with best practice. The Applicant maintained that the Environmental Statement is robust, proportionate and evidence-based, supported by extensive surveys, reasonable worst-case assumptions, and a management and monitoring framework enabling adaptive measures if required.

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

7.34 Officers also note that the application has been independently reviewed by Arup on behalf of the Council, the EA (the statutory body responsible for protecting and regulating the environment) and Natural England (the statutory body responsible for nature conservation). Critically, the EA and Natural England have confirmed no objection subject to securing all necessary mitigation, enhancement, monitoring and long-term management measures.

7.35 The relevant planning policy tests are set out in detail and considered below. Whilst the assessment is structured in line with the NPPF (2024), the assessment is also directly relevant to local and regional planning policy considerations.

7.36 Paragraph 193 of the NPPF (2024) states that when determining planning applications, local planning authorities should apply the following principles:

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

[own emphasis]

7.37 The Planning Statement acknowledges that the proposed development lies largely within the Mid Colne Valley Site of Special Scientific Interest (SSSI) but argues that the scheme will not result in significant adverse effects on the SSSI's designated features. It notes that the SSSI is already in an "unfavourable condition" (as assessed by Natural England in 2023), largely due to historic land uses, lack of active management since designation, and national ecological trends rather than site-specific issues. The Environmental Statement and supporting ecological assessments conclude that, with the revised scheme, no significant impacts arise on species, habitats or impact pathways, as development is focused

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

in less sensitive areas and the most ecologically valuable parts of the site are avoided. Extensive mitigation and enhancement measures are proposed, including habitat creation, reduction of disturbance, removal of invasive species, and expansion of wildlife refuge areas, all secured through a long-term Mitigation, Enhancement and Management Plan and an Operational Management and Activities Plan to be agreed with statutory stakeholders. The Planning Statement therefore contends that the proposal complies with NPPF paragraph 193, as there are no less harmful alternative sites and the public benefits of the scheme clearly outweigh any residual harm, with the development delivering a net ecological benefit and improved long-term management of the SSSI rather than degradation.

7.38 As the development results in no loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees), paragraph 193, part c), of the NPPF (2024) is not engaged by the proposal. The consideration of parts a), b) and d) are set out below.

7.39 Mitigation Hierarchy (NPPF Para 193 part a):

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; [own emphasis]

7.40 The application applies the NPPF mitigation hierarchy in full, first avoiding impacts, then mitigating any residual effects, and only lastly providing compensation and enhancement, guided by a comprehensive Alternative Sites Assessment and iterative redesign with Natural England. Subject to HOAC being secured as an occupier to the proposed development, it is accepted that Broadwater Lake is the only available, suitable and deliverable site, and that no suitable alternative site exists with fewer environmental impacts. It is accepted that a replacement facility is necessary and that the selection of Broadwater Lake is justified. By extension, it is accepted that harm cannot be avoided in its entirety.

7.41 From a design perspective, the proposal focuses activity in the less-sensitive south-east peninsula/East Channel, with the south-west wildlife refuge protected from disturbance. The revised layout also reduces land reclamation, relocates water access away from sensitive bird areas, and places works on existing hardstanding to avoid new terrestrial loss and retain the majority of trees within their root protection zones. In spatial terms, it is accepted that harm is avoided to an extent.

7.42 To avoid and mitigate effects within the SSSI, the scheme expands the quiet-water refuge from c. 3.42 ha to c. 14.72 ha and introduces buoyed “no-sail” limits, materially separating people and watercraft from key bird habitat. Disturbance is further reduced by a targeted access control/screening strategy (selective 1.8 m weldmesh, dry hedging, hazel hurdles and a living green screen, all micro-sited to avoid tree roots) and a directional, low-spill lighting design to prevent illumination of vegetated margins and lake edges. Seasonal island vegetation works are time-restricted to September–October (outside the nesting season) and

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

undertaken by mechanical, pesticide-free methods; any dredging is localised only to achieve safe sailing depths, with an established programme of monthly surface-water quality sampling to track nutrients and inform adaptive management.

- 7.43 Where effects cannot be fully avoided or mitigated, the scheme secures compensation and ecological enhancement. Measures include floating reedbeds with integrated nesting platforms in the east channel/refuges; re-profiling Island 02 to create two sheltered bays; removing Island 07 to open the Eastern Channel; eradicating invasive giant knotweed on Island 06; and seasonal management of vegetation on Islands 03/04 for ground-nesters. Additional habitat creation comprises wet-woodland infill on disused tracks, native grassland/scrub/tree planting (including reptile/invertebrate earth mounds), a new wildlife pond, sensory garden with native hedgerows, tern rafts, bird/duck boxes, and underwater willow planters to define refuge edges while preserving sightlines. Collectively these deliver a net increase in open water area and a material uplift in undisturbed refuge waters relative to the current baseline.
- 7.44 The avoidance, mitigation and compensation of impacts are proposed to be secured through conditions requiring a Mitigation, Enhancement & Management Plan (Condition 15), Operational Management and Activities Plan (Condition 41) and a Monitoring, Reporting & Adaptive Management Plan (Condition 55) with ongoing monitoring and adaptive management for as long as the development exists, to be agreed with statutory stakeholders. This is to cover long-term habitat/refuge management over 30+ years, invasive species control, access enforcement, lighting limits, and monitoring, including the Council's ongoing monthly water-quality sampling. Subject to the recommended conditions, officers conclude the scheme would deliver ecological betterment to the Mid Colne Valley SSSI compared with the current unmanaged baseline and is acceptable in ecological terms.
- 7.45 Benefits to outweigh impact (NPPF Para 193 part b):
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest; [own emphasis]*
- 7.46 The proposal has been assessed in accordance with NPPF Paragraph 193(b). The Environmental Statement concludes that the development will not result in any significant adverse effects on the designated features of the Mid Colne Valley SSSI, with disturbance contained to the least sensitive parts of the site and ecological impacts appropriately mitigated through design and long-term management measures. It is agreed by the Council's third party consultants, Arup, and Natural England that there are no fundamental objections subject to necessary mitigation being secured.

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

7.47 The development delivers significant social, community and public benefits, including the re-provision of the former HOAC facility lost to HS2, improved access to outdoor sport and recreation for children, young people, SEN and PRU groups, and the safeguarding of a valued borough-wide educational resource. A comprehensive Alternative Sites Assessment confirms that no less ecologically sensitive or operationally suitable alternative location exists. Taken together, these benefits clearly outweigh its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest, in accordance with paragraph 193(b) of the NPPF (2024).

7.48 Biodiversity Net Gains and Enhancing Public Access (NPPF Para 193 part d):

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate. [own emphasis]

7.49 Whilst the development is primarily a watersports community, outdoor activity and recreation centre, the scheme has been designed as an ecologically-led proposal which secures measurable and long-term biodiversity improvements within the SSSI. The development will significantly increase the extent of undisturbed wildlife refuge, deliver new wet woodland, floating reedbeds, island enhancements, invasive species removal, and a robust MEMP jointly overseen with key stakeholders, including Natural England. These measures represent a significant net improvement in habitat quality and ecological resilience across the site. In parallel, the scheme provides enhanced, inclusive public access to nature, including a new accessible bird hide, sensory and wildlife gardens, nature-based learning areas, and fully accessible routes and facilities designed to Equality Act and BS 8300 standards. The development therefore meets paragraph 193 part (d) of the NPPF (2024) by securing meaningful biodiversity net gain while improving public access to natural environments in a controlled and sustainable manner.

The “Do Nothing” Scenario:

7.50 It is important to compare the impacts of the proposed scheme to the “Do Nothing” scenario. If no development is undertaken, the former HOAC site will remain permanently closed with no viable replacement facility, noting the temporary operation at Troy Lake is explicitly identified as unsustainable in the medium to long term. This would result in the continued loss of outdoor activity provision for schools, SEN groups, PRUs, community clubs and families. The Broadwater Lake Site, part of the Mid Colne Valley SSSI, would also remain in an “unfavourable condition” (as confirmed by Natural England) without any management plan, meaning no biodiversity enhancements, habitat restoration, or ecological mitigation would occur, and existing issues such as invasive species and degraded habitat would persist. In this scenario, no improvements to accessibility,

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

safety, landscape quality, flood resilience or community infrastructure would be delivered, and the significant social, educational and environmental benefits associated with the proposed development would not be realised.

SSSI Summary:

- 7.51 In accordance with Paragraph 193 of the NPPF (2024), the development follows the mitigation hierarchy as per the requirements of part a), demonstrates that the benefits of the development outweigh the impact on the SSSI as per the requirements of part b), and both secures net gains for biodiversity as well as enhancing public access to nature as per the requirements of part d). Part c) is not applicable. Accordingly, the development fully complies with Paragraph 193 of the NPPF (2024).

Green Belt

- 7.52 The application site forms part of designated Green Belt land which is protected by national, regional and local planning policies. Chapter 13 of the NPPF (2024) sets out relevant Green Belt considerations, including paragraph 153 of the NPPF (2024) which establishes that substantial weight should be given to any harm to the Green Belt, that inappropriate development is, by definition, harmful to the Green Belt and that very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. Policy G2 of the London Plan (2021), Policy EM2 of the Hillingdon Local Plan: Part 1 (2012) and Policy DMEI 4 of the Hillingdon Local Plan: Part 2 (2020) also apply. Please refer to Appendix C for a more comprehensive list of relevant planning policies.
- 7.53 The NPPF (2024) provides additional guidance on Green Belt policy, including the identification of Grey Belt land and circumstances where development may be considered appropriate. These changes do not alter the fundamental purposes of the Green Belt or the substantial weight afforded to Green Belt harm. The Development Plan remains the statutory starting point for decision-making, however, where relevant local policies predate or do not reflect the Grey Belt framework, the NPPF provides material interpretative guidance. Accordingly, the assessment below is structured in line with the NPPF (2024), but it should be noted that development is still appropriately assessed against relevant to local and regional planning policy requirements.

Whether the development constitutes Grey Belt:

- 7.54 The definition of Grey Belt is stated within Annex 2: Glossary of the NPPF (2024) and is set out below:

Grey belt: For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development. [own emphasis]

7.55 The definition of previously developed land is stated within Annex 2: Glossary of the NPPF (2024) and is set out below:

Previously developed land: Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape. [own emphasis]

7.56 Paragraph 143 of the NPPF states that the Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;*
- b) to prevent neighbouring towns merging into one another;*
- c) to assist in safeguarding the countryside from encroachment;*
- d) to preserve the setting and special character of historic towns; and*
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. [own emphasis]*

7.57 Planning Practice Guidance (PPG) (Paragraph: 005 Reference ID: 64-005-20250225) confirms what a strong contribution to Purposes a), b) and d) is likely to constitute. The relevant considerations are set out in Table 8 below.

Table 8. Summary of PPG for Green Belt Purposes

Purposes	PPG Interpretation
<p>Purpose a):</p> <p>To check the unrestricted sprawl of large built up areas</p>	<p><i>This purpose relates to the sprawl of large built up areas. <u>Villages should not be considered large built up areas.</u></i></p> <p><i>Assessment areas that contribute strongly are likely to be free of existing development, and lack physical feature(s) in reasonable proximity that could restrict and contain development. They are also likely to include all of the following features:</i></p> <ul style="list-style-type: none"> <i>- be adjacent or near to a large built up area</i> <i>- if developed, result in an incongruous pattern of development (such as an extended “finger” of development into the Green Belt).</i>

<p>Purpose b):</p> <p>To prevent neighbouring towns merging into one another</p>	<p><i>This purpose relates to the <u>merging of towns, not villages</u>.</i></p> <p><i>Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features:</i></p> <ul style="list-style-type: none"> <i>- forming a substantial part of a gap between towns</i> <i>- the development of which would be likely to result in the loss of visual separation of towns.</i>
<p>Purpose d):</p> <p>To preserve the setting and special character of historic towns</p>	<p><i>This purpose <u>relates to historic towns, not villages</u>. Where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose.</i></p> <p><i>Assessment areas that contribute strongly are likely be free of existing development and to include all of the following features:</i></p> <ul style="list-style-type: none"> <i>- form part of the setting of the historic town</i> <i>- make a considerable contribution to the special character of a historic town. This could be (but is not limited to) as a result of being within, adjacent to, or of significant visual importance to the historic aspects of the town.</i>

7.58 Footnote 7 is set out in connection with paragraph 11 of the NPPF (2024) and is stated below:

7 The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 189) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change. [own emphasis]

7.59 Following an assessment of the land and application, it is considered that the development would not constitute Grey Belt. Each key part of the Grey Belt assessment is considered below:

- **Previously Developed Land:** The site has been developed for minerals extraction and remains of permanent structures have blended into the landscape. As such, the site is excluded from the definition of previously developed land.
- **Green Belt purposes (a), (b), or (d):** The site is adjacent to Harefield Village, Denham Village, Denham Garden Village, Higher Denham Village, West Hyde Village, and Newyears Green hamlet. Villages should not be considered large built up areas. As such, the site is not adjacent to or near

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

to a large built-up area, does not form a gap between towns, and there are no historic towns located in close proximity to the site. The site does not contribute strongly to purposes (a), (b), or (d).

- **Footnote 7:** The site is designated as a Site of Special Scientific Interest (SSSI), and area at risk of flooding. The application of the policies relating to these areas provide a strong reason for restricting the development. The development is restricted through planning conditions and obligations to address impacts on SSSI and flooding, and, without such controls, could be refused for such reasons, noting paragraph 193 of the NPPF (2024) which states that development which adversely impacts a SSSI should not normally be permitted. As such, the site is excluded from the definition of Grey Belt.

7.60 As the site does not constitute Grey Belt, the appropriateness of the development is considered below.

Appropriateness:

7.61 Paragraph 154 of the NPPF (2024) states that development in the Green Belt is inappropriate unless one of the following exceptions applies:

...

b) 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; [own emphasis]

7.62 Parts (a), (c), (d), (e), (f), (g) (h) of paragraph 154 are not considered to apply. In part, the development would meet the definition of buildings for outdoor sport and recreation as stated in part (b) but is required to preserve the openness of the Green Belt and not conflict with the purposes of including land within it, in order to meet the exceptions test.

7.63 Planning Practice Guidance (PPG) (Paragraph: 013 Reference ID: 64-013-2025022) sets out what factors can be taken into account when considering the potential impact of development on the openness of the Green Belt. It states:

Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgement based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

- *openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume*

- *the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness*
- *the degree of activity likely to be generated, such as traffic generation*

Spatial Impact on the Openness of the Green Belt:

- 7.64 The Planning Statement explains that the proposed buildings represent the minimum scale necessary to deliver a safe, accessible and legally compliant replacement for the former HOAC facility. It is also stated that the uplift in floorspace compared with the 1990s buildings is required to meet modern statutory obligations, including the Equality Act, Building Regulations, Sport England guidance and accessibility standards.
- 7.65 The revised design has been substantially reduced following consultation, with around 800 m² of floorspace removed from the earlier scheme. Key elements such as the main building, workshop and shelter structures have all been scaled back, and the accommodation, changing, and safety areas have been recalibrated to a space efficient and workable size.
- 7.66 The three-zone layout (Operation, Safety and Camp Zones) is presented as essential to safeguarding, operational efficiency and safe circulation for children and vulnerable users. A single combined building was discounted because it would compromise security, supervision and functional separation.
- 7.67 Building heights and volumes have been lowered to sit beneath the tree canopy, with maximum eaves heights of 7.2 m, 3.5 m and 2.6 m depending on the zone. These heights are justified by operational needs such as boat storage, accessible changing areas, and required sightlines for water-safety supervision.
- 7.68 The development is located on existing hardstanding, with reduced boat storage (from circa 400 to 214 spaces) and car parking (from 83 to 50 spaces), ensuring that the majority of the site remains open. This is combined with a net increase in open water created through modifications to islands and new bay formation.
- 7.69 Whilst it is agreed that the development has been rationalised and justified to minimise the impact on openness, it is considered inevitable that a scheme that proposes 3,844m² total floorspace (GEA), in place of the Broadwater Sailing Club building (measuring at 150m² floorspace), would have a moderate-to-significant spatial impact on the openness of the Green Belt.

Visual Impact on the Openness of the Green Belt:

- 7.70 The Landscape and Visual Impact Assessment (LVIA) submitted concludes the proposals would have negligible effects on the Thames Valley National Character Area, the Colne Valley Regional Park and the Colne Valley: Rickmansworth to Uxbridge LCA, where a varied baseline of open water, woodland, recreation and major transport corridors already prevails. Within that context the scheme

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

represents a small, visually contained change. Habitat creation and shoreline enhancement, together with long-term woodland/scrub management, lead to minor beneficial effects by Year 15 as planting matures.

- 7.71 Construction produces short-term localised adverse effects (e.g., limited dredging, shoreline re-grading, invasive vegetation removal) that are temporary and confined. With operation and planting establishment, the peninsula and lake-edge improve materially; by Year 15, the LVIA identifies moderate beneficial effects for on-site receptors including open water, islands, native woodland, incidental vegetation and former hardstanding restored through planting and habitat creation.
- 7.72 The development is substantially screened by peninsula woodland, the island pattern within Broadwater Lake and the enclosing valley landform. Of 15 viewpoints considered, only two required full assessment: Viewpoint 03 (Hillingdon Trail) and Viewpoint 15 (Old Orchard Inn). At VP03, the Main Building and other structures are completely hidden year-round (summer and winter). At VP15, only a small fragment of roof may be glimpsed in winter before leaf cover returns, and this becomes fully screened in summer; as landscape measures mature, both viewpoints experience beneficial visual effects due to improved shoreline character and new island-like vegetation. Other receptors (towpath users, recreational route users, lake users and most residential properties) experience negligible to minor effects at Year 1, improving to negligible or minor beneficial by Year 15; the single dwelling at the site entrance experiences moderate adverse effects at Year 1, reducing to minor–moderate adverse effects as screening vegetation establishes (with scope to reduce further through advance planting).
- 7.73 The LVIA finds no significant adverse landscape or visual effects; several receptors benefit from enhanced habitat quality, improved shoreline profiles and strengthened vegetation structure. Development is confined to existing hardstanding and visually contained by woodland, so openness of the Green Belt is not harmed in landscape/visual terms. Arup, acting for the Council, reviewed the LVIA and confirmed it is thorough, proportionate and methodologically robust, with earlier requests for clarification (e.g., receptor sensitivity justification and cumulative assessment) satisfactorily addressed. Residual effects are neutral to beneficial overall, with long-term moderate benefits as planting matures.

Conclusion on the Impact to the Openness of the Green Belt:

- 7.74 Whilst it is agreed that the development would not have a significant adverse visual impact on openness, it will inevitably have a moderate-to-significant spatial impact on openness which is attributed substantial weight. It is therefore concluded that the development does not qualify for the exception listed under paragraph 154, part b), of the NPPF (2024) and that the development constitutes inappropriate development within the Green Belt. The development therefore requires Very Special Circumstances.

Very Special Circumstances:

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

7.75 Paragraph 153 of the NPPF (2024) states:

153. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations [own emphasis].

7.76 As per paragraph 153, substantial weight is given to the moderate-to-significant spatial impact to the openness of the Green Belt. In terms of other harms, it is assessed that the development would result in no significant adverse impacts to the Mid Colne Valley SSSI and biodiversity, noting that the development has been designed to avoid, mitigate and compensate for identified harms, including delivery of overall ecological betterment compared with the current unmanaged baseline.

7.77 The Alternative Sites Assessment (ASA) underpins the Very Special Circumstances case. In summary, the ASA concludes that Broadwater Lake is the only available, suitable and deliverable site, and that no alternative site exists with fewer environmental impacts. On the basis that HOAC occupies the development, as proposed to be secured under UU HoT i, Officers do not dispute this conclusion.

7.78 The proposals would deliver significant social, community and public benefits, reinstating and modernising the functions of the former Hillingdon Outdoor Activity Centre. The former facility was widely used by schools, Special Educational Needs (SEN) groups, Pupil Referral Units (PRU), youth organisations and families. The new centre is designed to offer inclusive, fully accessible provision for children, young people and adults with a wide range of disabilities and additional needs. This includes facilities such as Changing Places rooms, accessible accommodation, quiet areas and adaptable programme delivery. The statement draws on extensive national research evidencing that outdoor education and access to nature significantly improves mental health, physical wellbeing, behaviour, confidence and social development, with pronounced benefits for disadvantaged and vulnerable groups. The proposed centre would therefore play an important role in meeting identified needs within the borough, including gaps in provision for SEN pupils, PRU students and young people experiencing mental health challenges. These benefits are given significant weight in favour of Very Special Circumstances existing.

7.79 The scheme would also provide tangible economic benefits, including new permanent and seasonal jobs, apprenticeship pathways, and volunteering opportunities accessible to local residents, young people, disabled people and other under-represented groups. The former HOAC model demonstrated a strong ability to support young people into employment, and the new facility is expected

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

to enhance this function, supporting the borough's wider skills and employment objectives. Additional economic uplift is anticipated through visitor spending, equipment hire and increased activity supporting nearby local businesses. As a counter point, it is also acknowledged that the number of jobs created on the site is fairly low and it is unlikely, given the lack of public transport and pedestrian access, that there will be sufficient footfall generated to lead to spending in the local area. When accounting for paragraph 85 of the NPPF (2024), the economic benefits of the scheme are given moderate weight in favour of Very Special Circumstances existing.

7.80 In environmental terms, the proposal would deliver some enhancement to the SSSI and wider ecological setting. Broadwater Lake is an artificial former quarry landscape with limited active ecological management. The development includes a comprehensive package of mitigation and enhancement measures, such as improved nesting habitat for terns and gulls, woodland management, vegetation clearance on islands to support ground-nesting species, new orchard and wildlife planting, pond creation, and reinstatement of the existing Broadwater Sailing Club site as habitat once the club relocates. The environmental benefits have to be weighed against the potential harm to the SSSI, Green Belt and protected habitat and so cannot be considered substantial. On balance, these environmental benefits are given moderate-to-significant weight in favour of Very Special Circumstances existing.

7.81 Overall, the combined social, economic and environmental benefits presented are assessed as sufficient to clearly outweigh the identified harms to the Green Belt and SSSI. It is concluded that Very Special Circumstances exist in this case and the development is considered to comply with relevant Development Plan policies.

Flood Risk – Sequential Test and Exceptions Test

7.82 Paragraph 174 of the NPPF (2024) sets out the following sequential test:

174. The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding... [own emphasis added]

7.83 Paragraph 177 of the NPPF (2024) sets out the following exceptions test:

177. ...having applied the sequential test, if it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3.

178. The application of the exception test should be informed by a strategic or site-specific flood risk assessment, depending on whether it is being applied

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

during plan production or at the application stage. To pass the exception test it should be demonstrated that:

a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and

b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

[own emphasis added]

- 7.84 A topographical survey confirms varying ground levels across the site, with most of the peninsula and access road lying within Flood Zone 1 (low risk), while the southern parcel lies in Flood Zone 2 and the wider lake area is designated Flood Zone 3. The Flood Risk, Drainage and Sequential Assessment (FRDSA) concludes that the peninsula is at low risk from river, small watercourse, surface water, groundwater and reservoir flooding, with reservoir flood risk described as extremely unlikely due to regulatory inspection regimes.
- 7.85 A Sequential Assessment, undertaken in line with the NPPF, compares the site with shortlisted alternatives (Ruislip Lido, Denham Quarry, Alderton/Aldenham Reservoir, and Bury Lake). It concludes that no suitable alternative site exists at lower flood risk, meaning the development complies with national sequential testing requirements.
- 7.86 The FRDSA concludes that the Exception Test does not need to be applied for 'Water Compatible' development within Flood Zone 3, Flood Zone 2 or Flood Zone 1. Notwithstanding this, the FRDSA demonstrates that the proposed development passes element (b) of the test, i.e. the development will be safe for its lifetime taking account of the vulnerability of its users and will not increase flood risk elsewhere. The wider sustainability benefits to the community are also considered in paragraphs 7.12 to 7.51 of this Committee Report and it is concluded that such benefits are significant and therefore outweigh the flood risk in this context. Therefore, it is considered that the exception test is passed.

Employment

- 7.87 The Outline Operational Management Plan states that the development is expected to support 6 permanent staff, 14 seasonal staff and 10 adult volunteers. It is noted that the seasonal staff are proposed to live in the seasonal accommodation for 6 months of the year, between April and September (as secured by Condition 5). This job creation weighs in favour of the scheme in the planning balance.
- 7.88 Policy E11 of the London Plan (2021) states that development proposals should support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate. In accordance with this, the Council's Planning Obligations Supplementary Planning Document (2014) requires that developments with estimated construction costs of over £2 million

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

and a construction period of three months or more deliver an in-kind employment and training scheme or financial contributions towards training and employment in the borough. An employment strategy and construction training scheme is proposed to be secured by legal agreement under UU HoT v.

Economy

- 7.89 Under Paragraph 85 of the National Planning Policy Framework (2024), significant weight should be placed on the need to support economic growth and productivity. Economic benefits will arise from the proposed development in terms of employment. These benefits and considerations are given weight in the overall assessment of the planning balance.

Design

- 7.90 The application seeks permission to redevelop the site to form the new Hillingdon Watersports Facility and Activity Centre, involving demolition of the existing sailing club building and construction of three new purpose-built zones (Operations, Safety, and Camp), two angler huts, new pontoons and slipways, camping and outdoor activity areas, ecological enhancements and safeguarded habitat land, new pedestrian routes, landscaping and screening, an internal access road, localised dredging, and relocation of Broadwater Sailing Club to the south of the lake, together with provision of coach drop-off, vehicle parking and cycle parking.

Landscape and Visual Impact

- 7.91 Policies D3 of the London Plan (2021), BE1 of the Hillingdon Local Plan: Part 1 (2012), DMHB 11 and DMHB 12 of the Hillingdon Local Plan: Part 2 (2020) are all directly relevant to the proposal. These policies can be read in full in the Committee Report Part 3 - Policy Appendix. In summary, these policies 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 the NPPF (2024) at chapter 12.
- 7.92 Broadwater Lake is a semi-natural, post-industrial valley-floor landscape, shaped by historic gravel extraction that left rectilinear lake edges, remnant concrete slabs, former slurry tanks and irregular islands, all now softened by extensive self-colonised broadleaved woodland of varying quality, including large areas of pioneer and invasive vegetation. The site sits within the Metropolitan Green Belt, the Colne Valley Regional Park and the Mid-Colne Valley SSSI, giving it elevated ecological value despite its disturbed origins. It is framed by wider waterbodies, woodland blocks, hedgerows, grazing land and small fields, with the Grand Union Canal forming its eastern boundary and major infrastructure, including the M25, A412 and the HS2 Colne Valley Viaduct, introducing movement and noise into an otherwise quieter waterside setting. Recreational activity is integral to its character, with existing sailing, angling and extensive public rights of way

contributing to a landscape where nature conservation, recreation and industrial legacy are closely interwoven.

- 7.93 The Council's Design Officer has assessed the revised scheme and confirms that it has made positive progress, particularly through positioning development on existing hardstanding, minimising tree removal, reducing massing, and incorporating ecological and landscape enhancements. The Landscape and Visual Impact Assessment indicates minimal visual impacts due to effective tree retention, with only temporary effects during construction. The overall site layout, which prioritises pedestrian space, limits vehicular access, and separates activity zones, is supported.
- 7.94 The Design Officer does note that the massing of the proposed buildings could be reduced further. The Design Officer comments that the materiality also requires refinement, with reservations expressed about the commercial appearance of standing seam cladding, extensive curtain walling, and exposed structures. The arrival space, coach drop-off, bin and bike storage arrangements, and some landscape details, particularly around tree-planting levels, caving areas, and zip-wire infrastructure, require improvement. Boundary treatments must ensure ecological permeability and avoid harm to existing trees. Lighting is appropriately limited but must demonstrate strict controls to protect the SSSI.
- 7.95 The Applicant maintains that the proposals have undergone significant refinement to reduce building massing, improve landscape integration, and ensure sensitivity to the site's Green Belt and SSSI context. Key amendments include reduced footprints and heights for the Operations and Camping Zone buildings, removal of high-impact elements such as the zip-line, and relocation of activity structures to minimise ecological disturbance.
- 7.96 The Applicant emphasises that essential operational and accessibility requirements, such as adequate changing facilities, inclusive shelter, and space for plant equipment, drive the remaining built form. Material choices, including zinc and flint, are defended as durable, low-maintenance, and contextually appropriate. The layout is described as landscape-led, with buildings sited on existing hardstanding to avoid tree loss, maintain openness, and protect sensitive habitats.
- 7.97 The Applicant also confirms that lighting will be tightly controlled, boundary treatments will avoid harm to existing trees and wildlife movement, and detailed specifications for materials, shelters, activity areas and planting will be secured by planning condition. Overall, the design team asserts that the revised scheme is sensitive, compliant with policy, and shaped by extensive dialogue with the Council, ecologists, and stakeholders, and therefore merits planning support.
- 7.98 Officers are satisfied that the extent of the proposals have been sufficiently justified and rationalised. The materiality is also considered to be acceptable in principle, subject to securing acceptable details by condition. It is agreed that the proposals are ecology and landscape-led and the proposal would integrate positively into the landscape.

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

- 7.99 Details of the proposed materials, lighting scheme, and landscape scheme shall be secured by Conditions 27, 28, 29, 30, 31, 34 and 46. Subject to such conditions, the developments shall secure an acceptable level of design quality. Accordingly, the development is considered to be acceptable in design and visual impact terms, in compliance with Policy BE1 of the Hillingdon Local Plan: Part 1 (2012), Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020), Policy D3 of the London Plan (2021), and paragraph 131 of the NPPF (2024).

Accessibility

- 7.100 Policy D5 of the London Plan (2021) states that development proposals should achieve the highest standards of accessible and inclusive design.
- 7.101 The Council's Access Officer has been consulted and confirmed that there are no fundamental accessibility issues, subject to conditions which secure the detail of the building entrances, accessible facilities and provision of evacuation lifts. Subject to Condition 33, the development is considered to accord with the requirements of Policy D5 of the London Plan (2021).

Security

- 7.102 Policy DMHB 15 of the Hillingdon Local Plan: Part 2 (2020) states that the Council will require all new development to ensure safe and attractive public and private spaces by referring to the Council's latest guidance on Secured by Design principles. This is supported by Policy D11 of the London Plan (2021).
- 7.103 The proposal makes security provisions, including the provision of fences to secure the site. Condition 52 is proposed to ensure that secured by design accreditation is achieved. Subject to this condition, the proposal would accord with Policy DMHB 15 of the Hillingdon Local Plan: Part 2 (2020) and Policy D11 of the London Plan (2021).

Fire Safety

- 7.104 Policy D12 of the London Plan (2021) states that all major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor. The statement should detail how the development proposal will function in fire safety terms.
- 7.105 A Gateway One Fire Statement has been submitted and has been prepared by a suitably qualified third-party assessor. This demonstrates consideration of fire safety principles early in the development process. The London Fire Brigade have been consulted and have highlighted risks associated with poorly installed PV systems and green roofs, noting that all relevant regulations and guidance should be followed. The GLA have also commented that the submission of a final and detailed Fire Statement is required. Officers consider this to be a matter which can be resolved by planning condition. Should the GLA require further information prior to the determination of the application, this can also be resolved at the Stage

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

2 of the GLA referral process. Notwithstanding, Condition 45 is proposed to secure the final detailed Fire Statement. Subject to this condition, the proposed would accord with the requirements of Policy D12 of the London Plan (2021).

Heritage

Designated and Non-Designated Heritage Assets

- 7.106 In accordance with Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the Council must give special attention to the desirability of preserving or enhancing the character or appearance of a conservation area when assessing development proposals within it. This statutory duty carries considerable importance and weight in the decision-making process and means that any identified harm, whether minor or less than substantial, must be clearly justified and outweighed by public benefits to be acceptable. The test requires decision-makers to consider not only the physical form of the proposal, but also its impact on the setting, spatial qualities, and distinctive character of the conservation area, ensuring that development responds positively to the area's established architectural and historic significance.
- 7.107 The site is well enclosed visually but lies in proximity to several assets, summarised below:
- Widewater Lock Conservation Area (partly overlapping the site at the access) and Widewater Lock Cottage (Grade II) to the south-east;
 - Black Jacks & Copper Mill Lock Conservation Area to the north-east;
 - Harefield Village Conservation Area further east;
 - Locally listed barns at Mayling Transport Yard (remnants of Blackwater Farm) to the east; and
 - Bridge No. 179 over the Grand Union Canal within the red line, identified here as a non-designated heritage asset due to age/association with the canal.
- 7.108 The scheme introduces low-scale development set within mature vegetation and consistent with the area's leisure/recreation character. Minor works at the access and limited additional movement (construction/operation) sit against a baseline that already includes quarry traffic. It is concluded that there will be no impact on the significance or setting of the Widewater Lock Conservation Area, the Grade II Listed Widewater Lock Cottage, Black Jacks & Copper Mill Lock Conservation Area and Harefield Village Conservation Area. There is also no impact on the significant or setting of the Maying Transport Yard barns due to screening.
- 7.109 The existing Council-owned Bridge 179 is non-designated and functions only as a gantry for utilities. It is in poor condition and any works affecting the bridge or canal infrastructure will be limited to sensitive repair or rationalisation, with new utilities installed beneath the canal via directional drilling to avoid disturbance. If further works are required, full technical details, including construction

methodology, heritage and ecological assessments, lighting, and future maintenance arrangements, are secured by Condition 26.

- 7.110 Subject to appropriately worded conditions, the proposed development would accord with Policies DMHB 1, DMHB 2, DMHB 3 and DMHB 4 of the Hillingdon Local Plan: Part 2 (2020) and Policy HC1 of the London Plan (2021).

Archaeology

- 7.111 Policy DMHB 7 of the Hillingdon Local Plan: Part 2 (2020) states that the Council, as advised by the Greater London Archaeological Advisory Service (GLAAS), will ensure that sites of archaeological interest within or, where appropriate, outside, designated areas are not disturbed. If that cannot be avoided, satisfactory measures must be taken to mitigate the impacts.
- 7.112 The site is not located within an Archaeological Priority Area. Broadwater Lake has been heavily altered by historic mineral extraction, which has removed archaeological remains across most of the former quarry. However, recent geotechnical investigation on the peninsula has identified apparently undisturbed alluvial deposits and gravel surviving beneath made ground in the area of the former quarry plant.
- 7.113 The Colne Valley Archaeological Priority Zone, which lies just east of the former quarry, is known for its nationally significant post-glacial hunter-gatherer sites, typically found at the interface between alluvial deposits and underlying gravels. Despite this, the proposed development's groundworks are confined to previously disturbed quarry land, with only limited surface-level works in areas where natural deposits remain.
- 7.114 On this basis, GLAAS concludes that the scheme is unlikely to harm any heritage assets of archaeological interest, and therefore no further archaeological assessment or conditions are required. Accordingly, the development would accord with the requirements of Policy DMHB 7 of the Hillingdon Local Plan: Part 2 (2020).

Residential Amenity

Impact on Neighbours

- 7.115 Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) states that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.
- 7.116 Within the wider area, neighbouring residents are located in South Harefield to the east (40m away at the closest point) and Denham Garden Village to the West (300m away at the closest point). In terms of the immediate locality, the site neighbours two residential properties and one caravan, one of which is located at the entrance point just south of the peninsula and two of which are located along

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

the existing access, leading to Moorhall Road. The plans indicate that a new car parking area is proposed to be located next to one residential property and at least 100m away from the residential properties on the access road. Consideration is therefore given to the use of buffer planting and design of car park lighting to avoid spillage into the neighbouring premises.

- 7.117 The external lighting scheme is limited to the external areas of the development, including entrances into the site, parking, walkways as well as the main facades of the proposed buildings. The proposed lighting design is simple and unobtrusive given that the key aim is to illuminate the site features and aid wayfinding whilst causing minimum impact on the surrounding environment and neighbouring properties. The final detail of the lighting scheme is proposed to be secured by Condition 46 and would ensure no detrimental impacts arise to neighbouring residents. Please refer to paragraphs 7.119 to 7.121 below for consideration of the noise impacts on these neighbours.
- 7.118 Based on the size and siting of the proposed development, it is not considered likely that such a proposal would have a significant detrimental impact on the outlook, amenity, daylight and sunlight of adjacent properties. As such, the development is not considered contrary to Policy DMHB 11, Part B, of the Hillingdon Local Plan: Part 2 (2020).

Environmental Issues

Noise

- 7.119 Policy D14 of the London Plan (2021) states that development should reduce, manage and mitigate noise to improve health and quality of life. This can be done by separating noise generating uses from noise sensitive uses. Mitigation can also be secured through screening, layout, orientation, uses and materials. This is supported by Policy EM8 of the Hillingdon Local Plan: Part 1 (2012).
- 7.120 The updated Noise Impact Assessment, incorporating the January 2026 Technical Note, confirms that construction and operational noise from the Hillingdon Watersports Facility and Activity Centre will not give rise to significant adverse effects. Baseline and HS2-future modelling show a predictable acoustic context, and while short-term exceedances of LOAEL (Lowest Observed Adverse Effect Level) or SOAEL (Significant Observed Adverse Effect Level) may occur during specific activities such as road construction or demolition, refined analysis demonstrates that previously identified UAEL (Unacceptable Adverse Effect Level) exceedances were overstated due to conservative assumptions and omission of the required temporal criteria. With corrected thresholds and realistic duration modelling, no unacceptable noise effects are anticipated, and all impacts can be effectively mitigated through best practicable means measures secured in a Construction Environmental Management Plan (CEMP). This is proposed to be secured under Condition 16, alongside Condition 6 which controls noise levels of the building services and plant.

- 7.121 The Council's Noise Specialist has been consulted and confirms no objection to the proposals. Overall, the assessment concludes that, subject to implementation of recommended construction controls and good acoustic design, the development will not result in significant adverse noise impacts. Subject to such conditions, the development would accord with Policy EM8 of the Hillingdon Local Plan: Part 1 (2012), Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) and Policy D14 of the London Plan (2021).

Air Quality

- 7.122 Policies SI 1 of the London Plan (2021), EM8 of the Hillingdon Local Plan: Part 1 (2012) and DMEI 14 of the Hillingdon Local Plan: Part 2 (2020) are all directly relevant to the proposal. These policies can be read in full in the Committee Report Part 3 - Policy Appendix, and in summary, seek to safeguard and improve air quality in order to protect existing and new sensitive receptors. These aims are also supported by the NPPF (2024) at chapter 15.
- 7.123 The application site is located outside the Hillingdon Air Quality Management Area and outside the catchment area of any identified Air Quality Focus Areas. Given the trip generation reported in the TA, the proposed development is considered to be Air Quality neutral and no further mitigation is deemed necessary during the operation of the site, other than the effective implementation of the proposed Travel Plan. During the construction phase, the appropriate risk mitigation measures for a Low Risk site during demolition, construction and trackout, and for a Medium Risk during earthworks, must be deployed in line with GLA's SPG on The Control of Dust and Emissions During Construction and Demolition (GLA, 2014). Conditions 8 and 16 are proposed to secure these measures, including a Construction & Environmental Management Plan. Subject to such conditions, the proposal is not considered contrary to Policy DMEI 14 of the Hillingdon Local Plan: Part 2 (2020), Policy EM8 of the Hillingdon Local Plan: Part 1 (2012) and Policy SI 1 of the London Plan (2021).

Trees and Landscaping

- 7.124 Policies G1 and G5 of the London Plan (2021), DMEI 1, DMHB 11 and DMHB 14 of the Hillingdon Local Plan: Part 2 (2020) are all directly relevant to the proposed development. These policies can be read in full in the Committee Report Part 3 - Policy Appendix. In summary, these policies seek to safeguard existing trees and deliver high quality landscaping in order to enhance amenity, biodiversity and green infrastructure. These aims are also supported by the NPPF (2024) at chapter 12.
- 7.125 The site forms part of a densely wooded nature reserve within the Mid Colne Valley SSSI and contains 96 surveyed trees and groups, predominantly willows, birches and alders. Most trees are low (Category C) or moderate (Category B) quality, with no Category A specimens. The proposed watersports and activity centre requires limited tree removals and localised Root Protection Area (RPA) encroachments; however, the assessment confirms these impacts are low in arboricultural terms. Trees recommended for removal are generally of low

individual value or poor condition, and none fall within the SSSI-designated woodland. Replacement planting provides substantial net gain, with new canopy cover exceeding losses by a factor of six. Where structures or surfacing encroach into RPAs, retained trees are assessed as capable of remaining viable provided appropriate mitigation, including no-dig surfacing, low-impact foundations, manual excavation, mulching and arboricultural supervision, is implemented. Additional long-term benefits will result from the 30-year ecology management plan to be undertaken by Hillingdon Council (the Applicant), alongside opportunities for routine woodland improvement, coppicing and pollarding to prolong tree life. Overall, with the recommended protection measures and management approach, the scheme will not have a significant negative effect on the tree resource and is assessed as having a positive overall impact.

- 7.126 The woodland resource is dominated by willow, alder and birch of generally low-to-moderate quality, with no Category A trees on site. A small number of removals are required to deliver essential buildings, access and activity areas, including 10 trees/groups in total, comprising 1 x Category B (T89), 8 x Category C (T47a, T51, T68 and groups G25a, G26, G27, G28, G30) and 1 x Category U (T72). Modest Root Protection Area (RPA) encroachments are also identified, but these are assessed as low impact and can be managed through standard measures such as tree protection fencing, no-dig surfacing, manual excavation under supervision and mulching, in line with BS 5837:2012. Overall, arboricultural effects are therefore considered to be low.
- 7.127 To offset these limited losses, the scheme secures a substantial net gain in canopy and habitat. It proposes 175 new specimen trees (including 28 orchard trees) plus 250 willows in submerged planters, 425 new trees in total, and wider woodland, hedgerow and wet-woodland enhancements, resulting in new planting area exceeding canopy loss by a factor of six. These measures are embedded within a long-term, 30-year ecological/woodland management plan and ensuring the retained trees remain viable and the overall effect on the tree resource is positive.
- 7.128 The final details of hard and soft landscaping are proposed to be secured by Condition 34 to ensure that the landscape scheme to be delivered is high quality and retained in the long term. Subject to this condition, the proposal would accord with Policies DMHB 11 and DMHB 14 of the Hillingdon Local Plan: Part 2 (2020).

Urban Greening Factor

- 7.129 Policy G5 of the London Plan (2021) states that major development proposals should contribute to the greening of London and that the target Urban Greening Factor (UGF) score for commercial development is 0.3.
- 7.130 The Urban Greening Factor score of the proposed development is 0.98, which far exceeds the London Plan requirement of 0.3 for commercial developments as set out in Policy G5 of the London Plan (2021).

Biodiversity Net Gain

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

- 7.131 For context, it is noted that the site lies within a SSSI and SINC, so all onsite habitats carry high strategic significance in the statutory metric.
- 7.132 The Environment Act 2021 has established that all planning permissions granted in England have to deliver at least 10% BNG from January 2024. Paragraph 187 of the NPPF (2024) also states that planning decisions should contribute to and enhance the natural and local environment by: d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. This is supported by Policy G6 of the London Plan (2021) and Policy DME1 7 of the Hillingdon Local Plan: Part 2 (2020).
- 7.133 Biodiversity has been subject to a third-party review by Arup on behalf of the Local Planning Authority. Notably, a revised Biodiversity Net Gain (BNG) Assessment and BNG Addendum, including new survey data, revised baselines, updated evaluations and refined mitigation proposals, have been submitted for review. Arup have confirmed that earlier concerns, such as insufficient wintering bird data, lack of detail on land-based activities, impacts on otter and eel, and alignment with HS2 mitigation, have now been addressed.
- 7.134 Arup concluded that the BNG assessment is generally robust and has been prepared by suitably qualified specialists, but there are some discrepancies resulting in small potential overestimation of the post-development biodiversity value. Whilst this is not expected to change the core conclusions or the ES biodiversity findings, it may reduce the overall net gain to a level that no longer meets the minimum 10% requirement at this stage.
- 7.135 The BNG Addendum submitted confirms that the scheme delivers a 9.72% area-based biodiversity gain, which is less than the 10% gain required. However, as the planning application was originally submitted prior to 12 February 2024, it falls under transitional provisions of the Environment Act and is not legally required to achieve the mandatory 10% BNG threshold. Nevertheless, the Applicant commits to meaningful ecological enhancement, secured through the long-term Management and Enhancement Management Plan (MEMP) (Condition 15).
- 7.136 The Addendum outlines further opportunities for enhancement, such as expanded marginal vegetation, selective bank re-profiling, and additional reedbed filtration, many of which may be brought forward through the MEMP as monitoring evidence emerges. Floating habitats will continue to be implemented as part of the scheme. Condition 15 is proposed to secure the final detail of the MEMP.
- 7.137 In response to EA comments, the Addendum confirms that the revised metric correctly incorporates floating habitats, maintains lake condition uplift from moderate to “fairly good,” and clarifies that no enhancements have been claimed for the River Colne given limited site influence and its moderate condition baseline. Updated river assessments and habitat surveys will be undertaken in 2026 to guide future improvement under the MEMP.

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

- 7.138 Natural England have also confirmed that they no longer have fundamental objections to the proposal, and that the assessment is appropriate provided a strong, adaptive, fully funded long-term management and monitoring plan is secured as a planning condition. No further ES clarifications were requested.
- 7.139 Overall, the Addendum is robust and, addresses consultee comments in full. Alongside the MEMP (Condition 15), the final details of a Biodiversity Net Gain Scheme which secures at least 9.72% net gain and maximises net gains in biodiversity value for the development is proposed to be secured by Condition 35. Subject to such conditions, the proposal is considered to accord with the NPPF (2024), Policy G6 of the London Plan (2021) and Policy DMEI 7 of the Hillingdon Local Plan: Part 2 (2020).

Flood Risk and Drainage

- 7.140 Policy EM6 of the Local Plan: Part 1 (2012) outlines that the Council will require new development to be directed away from Flood Zones 2 and 3 in accordance with the principles of the National Planning Policy Framework (NPPF). Policy DMEI 9 of the Local Plan: Part 2 (2020) outlines that development proposals in Flood Zones 2 and 3 will be required to demonstrate that there are no suitable sites available in areas of lower flood risk. Where no appropriate sites are available, development should be located on the areas of lowest flood risk within the site. The approach in the Development Plan is consistent with Policy SI 12 of the London Plan (2021) and the NPPF (2024).
- 7.141 Policy SI 13 of the London Plan (2021) also requires that development proposals utilise sustainable urban drainage systems (SuDS) unless there are practical reasons for not doing so and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. This is supported by Policy EM6 of the Hillingdon Local Plan: Part 1 (2012) and Policy DMEI 10 of the Hillingdon Local Plan: Part 2 (2020).
- 7.142 The scheme is supported by an updated Flood Risk, Drainage and Sequential Assessment (FRDSA), reflecting comments from the EA and the GLA. The revised assessment incorporates design updates including land reclamation at the peninsula's northern and northeastern edges.
- 7.143 A topographical survey confirms varying ground levels across the site, with most of the peninsula and access road lying within Flood Zone 1 (low risk), while the southern parcel lies in Flood Zone 2 and the wider lake area is designated Flood Zone 3. The FRDSA concludes that the peninsula is at low risk from river, small watercourse, surface water, groundwater and reservoir flooding, with reservoir flood risk described as extremely unlikely due to regulatory inspection regimes.
- 7.144 As part of the proposed peninsula extension lies within Flood Zone 3b (functional floodplain), the scheme includes mitigation measures, such as raising site levels at the camping and operational zones, adopting flood-resilient building design,

and preparing a Flood Warning and Evacuation Plan. Final flood risk management measures are proposed to be secured by Conditions 36 and 51.

- 7.145 The drainage strategy notes that greenfield runoff rates are unchanged because the site already drains as existing and proposed buildings sit on historic impermeable hardstanding. Sustainable drainage (SuDS) measures, including trench soakaways and permeable surfacing, are incorporated, and foul water will be pumped to the public sewer on Moorhall Road. Final drainage strategy details are proposed to be secured by Conditions 37 and 39.

Representation received from the Environment Agency (EA):

- 7.146 The EA originally objected to the scheme on the grounds of flood risk. The Flood Risk Assessment submitted was not considered to meet national requirements and did not demonstrate that the development will not increase flood risk elsewhere. The EA stated that the FRA failed to assess how the increase in flood storage capacity and open-water area (716 m²) might affect downstream flood risk. As Broadwater Lake functions as a flood storage asset, any increased flood capacity could raise water levels entering the River Colne during overtopping or breach events. The EA also noted that the FRA relied on the outdated 2010 Upper Colne model.
- 7.147 In response to EA concerns regarding flood risk, the Applicant submitted a Flood Risk Clarification Note. They explained that Broadwater Lake is a hydraulically connected gravel pit rather than an impounded reservoir, and that the revised design deliberately ensures cut-and-fill balance so flood storage is not reduced. Using the EA's 2025 Upper Colne hydraulic model, they demonstrate that the proposal results in only a 0.11% increase in open water area, and modelled peak water levels differ by less than 0.5 mm between existing and proposed scenarios. This is too small to influence downstream flood risk. The Note also confirmed that the outfall pipe near the River Colne would operate only infrequently and does not materially affect modelling or flood risk. It was concluded that the scheme does not increase flood risk elsewhere.
- 7.148 Subject to Conditions 15, 16, 18, 19, 20, 21, 22, 23, 24, 36, 40, 41, and 55, the EA confirmed no objection on the basis of flood risk.

Council Assessment of Flood Risk and Drainage:

- 7.149 The Council's third-party consultants, Arup, have reviewed the submission with respect to water resources and flood risk and have confirmed that the ES provides clearer baseline data and adequately assesses potential effects on the lake system and surrounding waterbodies. The scale of dredging has been greatly reduced, removing earlier uncertainties. The EA requested an updated flood risk model which has been submitted and resolves any outstanding objections. Accordingly, no fundamental objections have been raised.
- 7.150 Condition 3 is proposed to require compliance with the submitted FRDSA, and Conditions 37 and 39 are proposed to secure the final details and implementation

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

of the drainage scheme. Final flood risk management measures are proposed to be secured by Conditions 36 and 51. Subject to such conditions, the proposed development is considered to accord with the NPPF (2024), Policies SI 12 and SI 13 of the London Plan (2021), Policy EM6 of the Hillingdon Local Plan: Part 1 (2012) and Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part 2 (2020).

Water Infrastructure

- 7.151 Policy SI 5 of the London Plan (2021) sets out water infrastructure requirements for commercial forms of development, including achieving at least the BREEAM excellent standard for the 'Wat 01' water category160 or equivalent, measures to reduce water use, provide adequate wastewater infrastructure capacity and minimise the potential for misconnections between foul and surface water networks.
- 7.152 Affinity Water, Thames Water and the Greater London Authority have been consulted. During the consultation process, neither Affinity Water and Thames Water raised any fundamental issues with the proposal in respect of water quality, efficiency, and related infrastructure, subject to safeguarding conditions (including Conditions 16, 18, 19, 20, and 21). However, as confirmed by the Greater London Authority, insufficient information has been submitted in respect of the BREEAM standards for Wat 01 credits and water metering and saving measures.
- 7.153 It is important to determine whether the submission of insufficient information needs to be resolved prior to determination or post approval via way of condition. The information requested is not of a unique nature and the information provided shows compliance with policy to the extent necessary at this stage of the process. Whilst it is accepted further information is necessary there is nothing to suggest that this would not be forthcoming. Securing the information by way of condition would satisfy the requirements of the planning policy. Subject to the Condition 38, the proposed development would accord with Policy SI 5 of the London Plan (2021).

Water Resources

- 7.154 Water resources refers specifically to the hydrological environment associated with Broadwater Lake and its surrounding water bodies. It covers all components of the water system that could be affected by construction and operation of the proposed development. This includes surface water bodies (lakes, rivers, channels), groundwater resources, drainage and surface water runoff and water quality and pollution risk.

Representation received from the Environment Agency (EA):

- 7.155 The EA were consulted and commented that the development involves excavation, treatment, and redeposit of waste in a sensitive environment (both for biodiversity and groundwater), but the Applicant had not provided enough information to show the project can meet pollution-prevention requirements. They

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

emphasised that the scheme will require one or more Environmental Permits, and that planning and permitting should be parallel-tracked to identify risks early. The EA noted that critical elements, such as demonstrating groundwater protection, finalising site layout, confirming the suitability of dredged and reused materials, potential need for abatement technology, and measures to control contamination mobilisation, remained unassessed. They further highlighted practical constraints, including the Applicant's construction timeline being unrealistic if permitting is required. Further detailed evidence on material suitability, pollution control, runoff management, and waste-handling processes was requested.

- 7.156 The Applicant responded by issuing a Technical Note confirming that no materials containing hazardous substances (as defined by the Joint Agencies Groundwater Directive Advisory Group (JAGDAG) list) would be reused, treated, or deposited on-site, and that no materials posing risks to groundwater or controlled waters would be used. They committed to ensuring all waste-related activities comply with the Environmental Permitting Regulations, obtaining the necessary permits, and testing/classifying all materials prior to reuse to demonstrate suitability and compliance with inert/waste acceptance criteria. The Applicant emphasised that, as a Local Authority, it is experienced in managing permitted waste and operations and concluded that risks to groundwater are adequately controlled through the permitting framework and the safeguards committed to.
- 7.157 Subject to Conditions 15, 16, 18, 19, 20, 21, 22, 23, 24, 36, 40, 41, and 55, the EA confirmed no objection on the grounds of water resources.

Assessment of Water Resources:

- 7.158 The Council's third-party consultants, Arup, have evaluated how the proposed development may affect the hydrological environment at Broadwater Lake. The revised ES is considered to set out a comprehensive description of existing water resources conditions, drawing on updated data for groundwater behaviour, lake water quality, drainage pathways and adjacent lakes. The ES confirms that the site currently has no operational foul drainage system and that rainfall largely infiltrates naturally into permeable ground, with only limited public sewer infrastructure nearby. These baseline clarifications address earlier gaps identified in consultation comments.
- 7.159 The revised development proposals significantly reduce dredging and land-reclamation activity, which in turn reduces risks to water quality and lake hydrodynamics. The updated cut-and-fill assessment shows that dredging is now confined to the eastern channel, producing a net increase in open water volume rather than a reduction. This is a positive change for the water environment, noting that a larger water volume reduces the likelihood of displaced floodwater or adverse hydraulic effects.
- 7.160 Mitigation for the protection of water resources is proposed through the Construction Environmental Management Plan and Operational Management and Activities Plan. During construction, measures such as controlling dredging methods, preventing sediment mobilisation, and managing storage of materials

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

will be required to safeguard lake water quality. Operationally, the Applicant must finalise the sustainable drainage strategy, confirm the role of infiltration versus outfalls, and coordinate with water regulators to ensure long-term protection of groundwater abstractions used by Affinity Water. Subject to control secured through condition, significant adverse effects on water quality, groundwater or the wider water environment are unlikely. Conditions 15, 16, 18, 19, 20, 21, 23, 24, 36, 40, 41, and 55 are proposed to be secured.

Land Contamination

- 7.161 Policy DMEI 12 of the Hillingdon Local Plan: Part 2 (2020) states that development on potentially contaminated sites shall assess conditions and demonstrate that the site can be safely remediated. Planning conditions and S106 legal agreements can be used to secure the appropriate level of detail required.
- 7.162 A Ground Conditions assessment and Phase 1 Contamination Risk Assessment have been submitted with the Environmental Statement, in support of the application. These assessments have been informed by initial Phase II ground investigations and a geo-environmental interpretative report, as well as a ground gas risk assessment and details raised by the Environment Agency in relation to an unregistered historic landfill.
- 7.163 The Applicant has confirmed that earthworks planned within the limits of the regulated historical landfill will be minimal and limited to parking spaces, upgrading the existing access road, and construction of a shelter and bike shelter/storage area.
- 7.164 The submitted assessments have been reviewed by the Council's Contaminated Land Officer and the Council's third party consultant, Arup. It has been confirmed that the information submitted is sufficient and acceptable for this stage of the planning application process. Conditions 18, 19, 20 and 21 are proposed to secure further details of intrusive investigation, quantitative risk assessments, and a detailed remediation strategy. Subject to conditions, the proposal would comply with Policy DMEI 12 of the Hillingdon Local Plan: Part 2 (2020).

Minerals Extraction

- 7.165 The DMIN policies in the Hillingdon Local Plan: Part 2 (2020) set out how Hillingdon manages minerals extraction and safeguarding. DMIN 1 identifies and protects preferred areas for sand and gravel extraction and safeguards existing aggregates railheads from incompatible development, ensuring mineral resources are not sterilised by surface uses unless justified. DMIN 1A requires that any minerals development demonstrate no significant adverse impacts on amenity, health, water, biodiversity, heritage, aviation safety, land stability, or the highway network. DMIN 2 requires the prior extraction of mineral deposits before non-mineral development occurs, unless deposits are commercially unviable, environmentally unacceptable to extract, or outweighed by overriding community need. DMIN 3 mandates Environmental Impact Assessments, environmental management systems, and clear restoration and aftercare plans to return land to

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

its previous quality or beneficial after-uses such as recreation or habitat creation. DMIN 4 promotes the re-use and recycling of construction, demolition and excavation waste, supporting on-site processing and the substitution of recycled materials for primary aggregates, particularly at active extraction and landfill sites.

- 7.166 The wider Broadwater Lake area had been worked for sand and gravel extraction from the 1960s until the late 1990s, and the quarry was decommissioned in 1992. Planning permission ref. 2382/AL/92/0464 (dated May 1992) confirms that Hillingdon Council has registered and formally recognised the continued legal existence of a historic 1948 Interim Development Order (IDO) permission allowing the excavation of minerals by surface working at Broadwater Lake Quarry, Harefield. This registration does not allow quarrying or mineral extraction to resume immediately. Before any extraction can lawfully take place, the operator must submit and obtain approval for a modern scheme of planning conditions, required under the Planning and Compensation Act 1991. There is no record of these conditions being submitted for approval.
- 7.167 In effect, the site is not considered to be an active minerals extraction site and the proposals would not therefore result in the loss of an existing minerals use. As the development is confined to the southern peninsula, the only factor with the potential to constrain future extraction elsewhere on the site would be the operation of the facility. However, this is not considered to be fundamentally prohibitive in principle, subject to compliance with the relevant regulatory processes. Accordingly, the development is not considered to sterilise an active mineral resource or to preclude the potential for viable extraction to come forward in the future.

Transport

- 7.168 Policies T4, T6 and T6.2 of the London Plan (2021), and policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 (2020) are all directly relevant to the proposed development. These policies can be read in full in the Committee Report Part 3 - Policy Appendix, and in summary, seek to deliver development which is sustainable in transport terms and safeguards highway and pedestrian safety. These aims are also supported by the NPPF (2024) at chapter 9, including paragraph 116 which states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Proposed Operation

- 7.169 The replacement facility will host HOAC's educational and youth-focused activities, with peak weekday use of up to 120 children in summer months and 35 users at weekends. Most weekday groups will arrive by coach or minibus, with minibuses remaining on site all day. Winter use is minimal (8–10 individuals), mainly by car. The site will also continue to be used by Broadwater Sailing Club (BSC) and Gerrards Cross & Uxbridge Angling Society, all accommodated within the new facility.

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

Staff and Visitor Car Parking

- 7.170 Appendix C, Table 1, of the Hillingdon Local Plan: Part 2 (2020) confirms that car parking requirements for community centres should be determined on an individual basis.
- 7.171 The development proposes 50 car parking spaces, comprising:
- 36 standard bays
 - 6 Active EV charging bays
 - 6 Blue Badge bays
 - 2 minibus spaces
- 7.172 Car and minibus drop-off/pick-up areas and a coach turning circle are also provided. This replaces the informal circa 45 vehicle parking currently on site. This has been reviewed and accepted by the Council's Highways Authority.

Disabled Person Car Parking

- 7.173 Six disabled parking bays are proposed, meeting the London Plan (2021) Policy T6.5 and Sport England Accessible Sports Facilities Guidance, which requires 6% provision. This is accepted and proposed to be secured under Condition 34.

Electric Vehicle Charging Points (EVCPs)

- 7.174 Policy T6 of the London Plan (2021) states that where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles. All operational parking should make this provision, including offering rapid charging. This includes parking for vehicles which are required for the function of a building or the activities within it. This can include spaces for fleet vehicles, taxis or loading bays, but does not include parking for personal travel such as commuting.
- 7.175 The scheme includes six active EV charging points. Provided all operational parking spaces are provided with electric vehicle charging infrastructure, this provision is accepted and proposed to be secured under Condition 34.

Cycle Parking

- 7.176 A total of 42 cycle parking spaces are provided, including 18 long-stay and 24 short-stay. The Highways Authority requests a Parking Design & Management Plan to clarify exact locations and ensure all long-stay cycle spaces are secure, sheltered and accessible. The details of the proposed cycle parking are proposed to be secured by Condition 34.

Parking Design and Management Plan

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

- 7.177 In order to ensure safe and efficient on-site movement and protect pedestrian users, a Parking Design and Management Plan is required by condition and must cover:
- Access and circulation
 - Management of car, minibus and coach parking
 - Drop-off and collection arrangements
 - Cycle parking strategy
- 7.178 Accessible car parking provision and passive electric vehicle charging facilities have been proposed, requiring that these provisions are reviewed and uplifted in accordance with demand. The detail of a parking design and management plan is proposed to be secured under Condition 48.

Trip Generation

- 7.179 Trip generation is based on real-world data from HOAC’s former Dews Lane site. Peak periods for the development would occur during the summer months from April to September, when demand is highest due to school term-time outdoor learning programmes, large educational group visits, and the availability of good weather that enables a full range of water-based and land-based activities. During this period, the Centre can host up to 120 children per weekday and 30–35 users at weekends, with additional camping groups increasing activity levels on Fridays through Sundays. These months are therefore defined as “peak” because they represent the maximum intensity of visits, staffing, and operational activity at the site.
- 7.180 In contrast, the off-peak period from October to March reflects a substantial reduction in demand, driven by colder weather, reduced daylight hours, and school/organisation scheduling patterns. During this time, only 8–10 visitors per day typically attend, mainly for sailing activities, and staffing levels reduce accordingly. As a result, the off-peak period is characterised by significantly lower trip generation and limited operational scope, making it the quieter season for the site.
- 7.181 Please refer to Tables 9 and 10 for a summary of Summer peak weekly trip totals and a breakdown of the Summer peak trips by user.

Table 9. Summer Peak Weekly Trip Totals

Day	Arrivals	Departures	Total movements	Notes
Mon–Thu	19	19	38	Outside peak hours
Fri	23	19	42	4 PM-peak trips
Sat	20	20	40	10:00–15:00
Sun	20	24	44	Camping departures

Table 10. Summer Peak User Trip Breakdown

User/Vehicle	Mon–Thu	Fri	Sat	Sun	Notes
Coaches	3 in / 3 out	3 in / 3 out	-	-	Weekday groups
Minibuses (weekday)	3 in / 3 out	3 in / 3 out	-	-	SEND groups
Cars (weekday)	3 in / 3 out	3 in / 3 out	-	-	Drop-offs
Minibuses (weekend)	-	-	2 in / 2 out	2 in / 2 out	Weekend groups
Cars (weekend)	-	-	5 in / 5 out	5 in / 5 out	Weekend users
Camping – Minibuses	-	4 in / 0 out	-	0 in / 4 out	Fri arrivals / Sun dep
Camping – Cars	-	-	4 in / 4 out	4 in / 4 out	Supervisors
Staff – Permanent	8 in / 8 out	8 in / 8 out	6 in / 6 out	6 in / 6 out	Staff shifts
Staff – Seasonal	-	-	3 in / 3 out	3 in / 3 out	Ad-hoc
Deliveries	2 in / 2 out	2 in / 2 out	-	-	Weekday only

7.182 It is concluded that the proposed development would generate relatively low levels of vehicle activity, with up to 19 arrivals and 19 departures per day Monday–Thursday, 23 arrivals and 19 departures on Fridays, 20 arrivals and 20 departures on Saturdays, and 20 arrivals and 24 departures on Sundays, with around 16 daily trips in the off-peak season, all largely occurring outside network peak hours. These trips arise from relocated HOAC operations, meaning they are treated as already present on the wider road network, while existing Broadwater Sailing Club and angling activity would remain unchanged, so the Addendum identifies no increase in their trips. As a result, although these vehicle movements will now use the Moorhall Road/Boyers Pit access, it is concluded that there is no net increase in highway network demand, only a redistribution of existing trips. Subject to the proposed mitigation, including travel plan, Healthy Streets and Active Travel Zone measures, the transport impacts are accepted.

Healthy Streets and Active Travel Zone Assessment

7.183 The Applicant did not provide a complete Active Travel Zone (ATZ) assessment, so the Highway Authority undertook its own. The Highway Authority identified missing dropped kerbs and tactile paving at several locations around Moorhall Road. The Canals and River Trust canal enhancement project from Moorhall Road to Black Jacks Lock was also identified. In combination, a £177,800 contribution was agreed to deliver these improvements, supporting mode-shift targets. This is proposed to be secured under UU HoT ii.

- 7.184 A S278 highways agreement is also proposed to secure the identified Moorhall Road junction works to better facilitate active travel. This is proposed to be secured under UU HoT iv.

Sustainable Travel

- 7.185 The Transport Assessment Addendum demonstrates that, while the site's rural setting naturally limits the extent of travel by walking, cycling and public transport, the development has nonetheless maximised opportunities for sustainable travel wherever realistically achievable. A comprehensive package of measures is included, such as a new dedicated footway along the access road, improved pedestrian crossing arrangements, secure cycle parking for 42 bicycles, electric vehicle charging provision, and a full Travel Plan targeted at reducing single-occupancy car use among staff and local users. Crucially, the nature of the use means the majority of visitors comprise large educational groups arriving by coach or minibus, resulting in very low numbers of individual car trips and ensuring that group travel remains the predominant mode of access. With these measures in place, and having regard to the operational characteristics of the facility and the constraints of its location, the scheme appropriately supports and maximises sustainable travel opportunities and therefore responds positively to concerns raised about reliance on less sustainable modes.
- 7.186 A detailed and finalised Travel Plan is proposed to be secured under Condition 50.

Construction Logistics Plan and Service Delivery Plan

- 7.187 Having regard to comments received from TfL and the Highway Authority, a Construction Logistics Plan and a Service Delivery Plan are proposed to be secured under Conditions 17 and 49 respectively.

Transport Conclusion

- 7.188 Subject to the necessary planning conditions and obligations, the proposed development would not be considered to prejudice conditions on the local highways network, in accordance with Policies DMT 1, DMT 2, DMT 5 and DMT 6 of the Hillingdon Local Plan: Part 2 (2020) and Policies T4 and T7 of the London Plan (2021).

Sustainable Development

Whole-Life Carbon Cycle

- 7.189 Policy SI 2, Part F, of the London Plan (2021) states that development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

- 7.190 The Applicant has submitted a Whole Life-Cycle Carbon (WLC) assessment as required. The GLA have provided some further commentary on the information submission. There is sufficient scope to resolve any further comments as part of the GLA Stage 2 referral process. Condition 54 would secure the submission of a post-construction assessment to report on the development's actual WLC emissions. Subject to such a condition, the proposal would accord with Policy SI 2, Part F, of the London Plan (2021).

CO2 Emissions

- 7.191 Policy SI 2 of the London Plan (2021) and DMEI 2 of the Hillingdon Local Plan: Part 2 (2020) are relevant to the development proposed. These policies can be read in full in the Committee Report Part 3 - Policy Appendix. In summary, these policies seek to secure major development proposals as net zero-carbon by reducing greenhouse gas emissions in operation and minimising energy demand in accordance with the energy hierarchy. These aims are also supported by the NPPF (2024) at chapter 14.
- 7.192 Following consultation, an amended Energy Statement was prepared and submitted as part of the application. This confirms that the development would achieve an overall carbon emissions saving equal to 35%. This is achieved through the use of high efficiency systems and fabrics, heat pumps, pv panels, and reduced cooling demand. The Council's third-party consultants, Arup, have confirmed that the proposed design achieves substantial CO₂ reductions compared with a Part L baseline and that thermal comfort modelling shows an acceptable risk of overheating within the proposed buildings, indicating that the design responds appropriately to future climate-change scenarios.
- 7.193 Condition 43 is proposed to secure the finalised energy strategy, alongside detail on monitoring, to ensure compliance with the requirements. A planning obligation is proposed under UU HoT iii to secure a £42,821 contribution to make the development net zero-carbon. Subject to such conditions and planning obligations, the development would accord with Policy SI 2 of the London Plan (2021).

Energy Infrastructure

- 7.194 Policy SI 3 of the London Plan (2021) states that major development proposals should make provisions to connect into district heating networks, thereby utilising secondary heat sources. It is accepted that there are no nearby district heating networks within close proximity to the site and as such, it is not considered necessary, relevant or reasonable to secure a connection by planning condition.

Overheating

- 7.195 Policy SI 4 of the London Plan (2021) states that development should minimise adverse impacts on the urban heat island and reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy.

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

- 7.196 An Overheating Analysis report has been submitted for review and concludes that all spaces pass TM52, and the building design is suitable to maintain safe and comfortable internal temperatures during hot weather. The Council's third party consultant, Arup, have confirmed that the proposed design does not present any significant overheating concerns. The modelling demonstrates compliance with relevant regulations. Subject to Condition 44 which is to secure the final detailed designs, the development is considered to accord with the requirements of Policy SI 4 of the London Plan (2021).

Circular Economy

- 7.197 Policy SI 7 and Policy D6 of the London Plan (2021) require developments to be designed with adequate, flexible, and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food. Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) supports this policy from a design perspective.
- 7.198 Specifically, Policy SI 7, Part B, of the London Plan (2021) states that referable applications should submit Circular Economy Statements to promote circular economy outcomes and aim to be net zero-waste. Policy EM11 of the Hillingdon Local Plan: Part 1 (2012) also supports these objectives.
- 7.199 A Waste Management Plan has been submitted for consideration and includes dedicated areas for bin storage and collection. The Council's Waste Strategy Officer has not raised any concerns, and the detail submitted is deemed to be sufficient and acceptable.
- 7.200 A Circular Economy Statement has been submitted for consideration. Whilst the GLA have requested that further information is submitted, it is considered that these matters can be resolved post-committee as part of the GLA Stage 2 referral process. A post-construction circular economy monitoring report is also proposed to be secured by Condition 53. Subject to such a condition, the proposed development would accord with Policy SI 7 of the London Plan (2021).

Digital Connectivity

- 7.201 Policy SI 6 of the London Plan (2021) requires that development provides ducting space for full fibre connectivity.
- 7.202 Condition 7 is proposed and would ensure that sufficient ducting space for full fibre connectivity infrastructure is provided within the development. Subject to the recommended condition, the proposed development would accord with Policy SI 6 of the London Plan (2021).

8 Other Matters

High Speed Two (HS2)

- 8.1 In August 2018, the Secretary of State for Transport (SoSfT) gave Directions to the local planning authorities named in the Schedule, including Hillingdon Council. All LPA's identified must consult with HS2 for all applications within the identified zone (being that related to the route of the HS2 railway line).
- 8.2 The Site lies in close proximity to the proposed works on the Colne Valley Viaduct crossing Moorhall Road, with areas of works falling within the redline of the proposal development. HS2 were therefore consulted as part of the planning application process. Following the submission of amendments in November 2025, HS2 confirmed that many earlier concerns have been addressed and raised no objection subject to safeguarding conditions.
- 8.3 HS2 has commented that there were inaccuracies in the applicant's depiction and terminology regarding gravel islands, but Officers do note that this can be corrected as part of the detailed design process secured by planning conditions (including Condition 34 for final details of the landscaping scheme). HS2 also advised that construction works are not complete, noting that works are ongoing. HS2 have requested to be part of the proposed Steering Group (as secured by Condition 40). To protect the HS2 programme and associated assets, HS2 requests planning conditions requiring a Construction Environmental Management Plan (Condition 16) and a Construction Logistics Plan (Condition 17).

Airport Safeguarding

- 8.4 Policy DMAV 1 of the Hillingdon Local Plan: Part 2 (2020) states that the Council will support the continued safe operation of Heathrow Airport and RAF Northolt and will consult with the airport operator on proposals in the safeguarded areas. Proposals that may be a hazard to aircraft safety will not be permitted.
- 8.5 The site is located outside of the 3km perimeters for Heathrow Airport and RAF Northolt, but it within the 3km perimeter for Denham Airport. Denham Airport, the National Air Traffic Services, Heathrow Airport Ltd and the Ministry of Defence have been consulted and have confirmed no safeguarding objections. The proposal is considered to comply with Policy DMAV 1 of the Hillingdon Local Plan: Part 2 (2020).

Environmental Impact Assessment

- 8.6 Legislation pertaining to Environment Impact Assessments are set out under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (or the EIA Regulations). The EIA Regulations set out that any Schedule 1 development and that Schedule 2 development with likely significant effects on the environment (as determined by the Local Planning Authority) will require an EIA.

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

8.7 Whilst Schedule 1 is not applicable to the Broadwater Lake application, it is noted that Schedule 2 development is defined as follows:

“Schedule 2 development” means development, other than exempt development, of a description mentioned in column 1 of the table in Schedule 2 where—
(a) any part of that development is to be carried out in a sensitive area; or
(b) any applicable threshold or criterion in the corresponding part of column 2 of that table is respectively exceeded or met in relation to that development;

8.8 In connection with the above, the EIA Regulations define sensitive areas as follows:

“sensitive area” means any of the following—
(a) land notified under section 28(1) (sites of special scientific interest) of the Wildlife and Countryside Act 1981;...

8.9 The following schedule is considered to be applicable when assessing the development in respect of the EIA Regulations:

<i>10 Infrastructure projects</i>	
<i>(b) Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas;</i>	<i>(i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or</i> <i>(ii) the development includes more than 150 dwellings; or</i> <i>(iii) the overall area of the development exceeds 5 hectares.</i>

8.10 The development is an urban development project on site measuring circa 80ha in area which is notified as a SSSI which is defined as a sensitive area for the purposes of the EIA Regulations. As such, it was agreed that the proposed development would qualify as EIA development and as such an Environment Statement (ES) has been submitted.

8.11 A formal scoping exercise was undertaken, and it was agreed that the following topics were ‘scoped in’ the ES:

- Biodiversity;
- Water Resources and Flood Risk;
- Ground Conditions and Contamination; and
- Landscape and Visual.

8.12 The ES submitted sets out environmental information about the scheme, including a description of the development, its predicted environmental impacts and the measures intended to mitigate any adverse impacts. It is provided to allow a wider public understanding of the environmental effects of the project.

- 8.13 The amended 2025 ES has been reviewed by a third-party consultant, Arup, and they have confirmed that it is clear, appropriate, and consistent with both the adopted scoping opinion and relevant EIA guidance. Consultation responses have been properly incorporated, and the ES demonstrates a sound approach to assessing cumulative effects, including both intra-project and inter-project impacts. Arup have confirmed that the Applicant's responses to the Interim Review Report satisfactorily address all previously identified clarifications and Regulation 25 matters, including cumulative effects and Non-Technical Summary updates.
- 8.14 The consideration of technical matters, including climate change and air quality have been considered and are set out within paras 7.21 to 7.51 (SSSI and Biodiversity), 7.154 to 7.160 (Water Resources), 7.82 to 7.86 and 7.140 to 7.150 (Sequential Test, Flood Risk and Drainage), 7.161 to 7.164 (Ground Conditions and Contamination) and paras 7.91 to 7.99 (Landscape and Visual Impact) of this Committee Report. Subject to the relevant mitigation secured by planning conditions and obligations, any adverse impacts identified are not considered to be significant.

Compliance with EIA Regulation 64(2)

- 8.15 Hillingdon Council is both the Applicant for the proposed development and the Local Planning Authority responsible for determining the application. As the proposal constitutes EIA development, the Local Planning Authority has implemented appropriate administrative arrangements to ensure that there is a functional separation between the Applicant and the Local Planning Authority, in accordance with regulation 64(2) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, to secure objective and impartial decision-making.

Human Rights

- 8.16 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

- 8.17 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.

Local Finance Considerations and CIL

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

Planning Obligations

- 8.18 Policy DMCI 7 of the Hillingdon Local Plan: Part 2 (2020) states that whilst infrastructure requirements will be predominantly addressed through the Council's Community Infrastructure Levy (CIL), planning obligations will be sought on a scheme-by-scheme basis. Applications that fail to secure an appropriate Planning Obligation to make the proposal acceptable will be refused.
- 8.19 The Community Infrastructure Levy Regulation 2010 (Regulations issued Pursuant to the 2008 Act) and the NPPF have put three tests on the use of planning obligations into law. It is unlawful (since 6th April 2010) to request planning obligations that do not meet the following tests:
- i. necessary to make the development acceptable in planning terms;
 - ii. directly related to the development; and
 - iii. fairly and reasonable related in scale and kind to the development.
- 8.20 The effect of the Regulations is that the Council must apply the tests much more strictly and is only to ask for planning obligations that are genuinely necessary and directly related to a development. Should planning obligations be requested that do not meet the policy tests the Council would have acted unlawfully and could be subject to a High Court challenge.
- 8.21 On the basis of the NPPF and the Community Infrastructure Levy Regulation 2010, it is only considered reasonable to request contributions for the matters outlined in the Heads of Terms contained in the Summary of Recommendation section at the beginning of this report. These are listed in summary below:
- i. Community Centre Delivery Plan
 - ii. Healthy Streets/Active Travel Zone Contribution
 - iii. Carbon Offset Contribution
 - iv. Section 278 Agreement
 - v. Employment/Construction Training Scheme
 - vi. Project Management & Monitoring Fee

Community Infrastructure Levy

- 8.22 Please be advised that as from 1 April 2012, all planning approvals for schemes with a net additional internal floor area of 100m² or more will be liable for the Mayoral Community Infrastructure Levy (Mayoral CIL), as legislated by the Community Infrastructure Levy Regulations 2010 and The Community Infrastructure Levy (Amendment) Regulations 2011. The liability payable will be equal to £60 per square metre (from April 2019). The London Borough of Hillingdon is a collecting authority for the Mayor of London and this liability shall be paid to LBH in the first instance.
- 8.23 In addition, the development represents Chargeable Development under the Hillingdon Community Infrastructure Levy, which came into effect on 1st August 2014.

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

- 8.24 The liability payable for the development is as follows (subject to indexation):
Hillingdon CIL: £0
Mayoral CIL: £241,745.45
- 8.25 However, please note that this has been calculated based on the information available to the officer. The final amount will be reviewed post determination by the Council's Planning Obligations Team and set out to the liable party in line with the CIL Regulations.

9 Conclusion / Planning Balance

- 9.1 This planning application seeks to redevelop the Broadwater Lake site to deliver the Hillingdon Watersports Facility and Activity Centre, replacing the former HOAC and continuing its role in providing outdoor and environmental education for young people, including disadvantaged and disabled groups. The scheme includes new watersports, safety, camping and support facilities with accessible accommodation, relocation of the sailing club to the south of the lake, new pontoons and slipways, improved access and parking, and associated landscaping, woodland planting and ecological enhancements, including floating reedbeds and limited dredging.
- 9.2 The former HOAC facility was lost as a direct consequence of HS2 construction, which permanently removed the site's ability to operate as an outdoor activity centre. A comprehensive Alternative Sites Assessment reviewed 71 lakes within a 20-km radius and concluded that Broadwater Lake is the only viable and deliverable location capable of accommodating the full range of required land- and water-based activities within the HS2 funding agreement. Subject to a suitably worded legal agreement which secures the long-term occupation of the site by HOAC, Officers agree with this conclusion.
- 9.3 In line with the NPPF (2024) and the Development Plan, the proposal applies the biodiversity mitigation hierarchy and has been designed to minimise effects on the Mid Colne Valley SSSI. Harm is avoided where possible by focusing development on existing hardstanding, concentrating activity in the less sensitive south-east of the site, and significantly expanding the quiet-water refuge. Residual impacts are mitigated through access control, lighting design, vegetation management and limited dredging, with compensation and enhancement provided through habitat creation, island re-profiling and removal, invasive species eradication, and additional biodiversity features. These measures are secured through conditions requiring a Mitigation, Enhancement & Management Plan (Condition 15), an Operational Management and Activities Plan (Condition 41), and a Monitoring, Reporting & Adaptive Management Plan (Condition 55), ensuring ongoing management and adaptive monitoring for the lifetime of the development in agreement with statutory stakeholders. Overall, the scheme delivers a net ecological benefit, strengthens long-term SSSI management, and provides social and community benefits that clearly outweigh the harm identified, in accordance with the Development Plan.

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

- 9.4 It is important to compare the impacts of the proposed scheme to the “Do Nothing” scenario. If no development is undertaken, the former HOAC site will remain permanently closed with no viable replacement facility. This would result in the continued loss of outdoor activity provision for schools, SEN groups, PRUs, community clubs and families. The Broadwater Lake site would also remain in an “unfavourable condition” (as confirmed by Natural England) without any management plan, meaning no biodiversity enhancements, habitat restoration, or ecological mitigation would occur, and existing issues such as invasive species and degraded habitat would persist. In this scenario, no improvements to accessibility, safety, landscape quality, flood resilience or community infrastructure would be delivered, and the significant social, educational and environmental benefits associated with the proposed development would not be realised.
- 9.5 As inappropriate development in the Green Belt, the proposal requires Very Special Circumstances. Officers consider that the substantial social, community, environmental and educational benefits, including reinstating a vital facility for schools, SEN groups, youth organisations, Broadwater Sailing Club, and vulnerable young people, clearly outweigh the identified harm. The design is high quality, visually contained, and acceptable in landscape terms.
- 9.6 Planning obligations will secure the occupation and operation of the development by HOAC and Broadwater Sailing Club on the site, alongside net-zero carbon measures, sustainable transport improvements, and employment and training benefits.
- 9.7 Subject to the planning conditions and obligations recommended, the proposed development is considered acceptable with respect to design, heritage, residential amenity, environmental issues, transport, and sustainability.
- 9.8 Due regard has been given to the comments received as part of the consultation process and it is concluded that the proposal complies with the Development Plan. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. For the reasons outlined above and within the main body of the report, this application is considered to comply with the Development Plan and is recommended for approval, subject to securing the planning conditions set out in Appendix 1, securing the necessary planning obligations via an appropriate legal agreement, Stage 2 referral to the Greater London Authority and referral to the Secretary of State.

10 Background Papers

Relevant published policies and documents considered 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

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

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@hillington.gov.uk.

Hillingdon Planning Committee – 21st April 2026

PART 1 – Members, Public & Press

APPENDICES

Planning Application

2382/APP/2023/2906

Appendix 1: Recommended Conditions and Informatives

Conditions

1. COM3 Compliance - Time Limit

Compliance - 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 Compliance - Accordance with Approved Plans

Compliance - 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:-

Site Location Plan:

1329-HAV-ZZ-XX-DR-A-S2-1000 P01

Site:

HWSFAC-COL-00-XX-DR-L-1010 Rev. 29
HWSFAC-COL-00-XX-DR-L-1108 Rev. 07
HWSFAC-COL-00-XX-DR-L-1109 Rev. 15
HWSFAC-COL-XX-XX-DR-L-1110 Rev. 11
HWSFAC-COL-XX-XX-DR-L-1120 Rev. 19
HWSFAC-COL-00-XX-DR-L-1210 Rev. 10
HWSFAC-COL-XX-XX-DR-L-6189 Rev. 06
HWSFAC-COL-XX-XX-DR-L-6190 Rev. 11
HWSFAC-COL-00-XX-DR-L-6240 Rev. 08
HWSFAC-COL-XX-XX-DR-L-6362 Rev. 08
HWSFAC-COL-XX-XX-DR-L-6420 Rev. 11

Operation Zone:

1329-HAV-Z1-ZZ-DR-A-S2-1100 P01
1329-HAV-Z1-RF-DR-A-S2-1101 P01
1329-HAV-Z1-ZZ-DR-A-S2-2100 P01
1329-HAV-Z1-ZZ-DR-A-S2-2200 P01

Safety Zone:

1329-HAV-Z2-ZZ-DR-A-S2-1102 P01

1329-HAV-Z2-ZZ-DR-A-S2-2101-S2 P01
1329-HAV-Z2-ZZ-DR-A-S2-2201 P01

Camp Zone:

1329-HAV-Z3-ZZ-DR-A-S2-1103 P01
1329-HAV-Z3-ZZ-DR-A-S2-2102 P01

Anglers Shelters:

1329-HAV-ZZ-ZZ-DR-A-S2-1104 P01

Bike Shelter and Refuse Store:

1329-HAV-ZZ-ZZ-DR-A-S2-1105

Thereafter the development hereby permitted shall 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. COM5 Compliance - Supporting Documentation

Compliance - Supporting Documentation

The development hereby permitted shall be completed in accordance with the specified supporting plans and/or documents:

Planning:

Planning Statement (Dated November 2025)
Alternative Site Assessment (Dated November 2025)
Very Special Circumstances and Development Benefits (Dated August 2025)
Community Benefits Statement (Dated November 2025)
Equality Impact Assessment V1 (Dated June 2025)

Environment Impact Assessment:

Environmental Statement (including Appendices) (Dated November 2025)
Environmental Statement (ES) Non-Technical Summary (Submitted December 2025)

Design and Heritage:

1329-HAV-XX-XX-RP-A-S2 -0010 Rev. P01 Design and Access Statement (Dated 14th November 2025)
794-PLN-HER-01798 V3 Built Heritage Statement (Dated July 2025)
Archaeological Desk Based Assessment Version 4 (Dated August 2025)

Gateway One Fire Statement Issue P06 (Dated 13th November 2025)
1329-HAV-XX-XX-RP-A-S2-0013 Rev. P02 Schedule of Accommodation (Dated 14th November 2025)
24-070 Rev. P02 Broadwater Sailing & External Lighting Designs Considerations (Dated August 2025)

Environmental:

J20-13430B-10-R01-02-F Rev. 02 Air Quality Assessment (Dated 12th August 2025)
Flood Risk, Drainage and Sequential Assessment (Dated August 2025)
Surface Water Drainage Proposal Clarification Note v1-0 (Dated 9th February 2026)
Surface Water Drainage Proposal Clarification Note v1-1 (Dated 11th February 2026)
J20-13430B-10-R01-02-F Arboricultural Impact Assessment (Dated 17th November 2025)
L-2121-DOC-002 - Rev 6 Addendum Landscape Strategy (Dated 13th March 2026)
13430B-20-R01-03 Rev. 02 Noise Assessment (Dated 8th August 2025)
13430D-20-R01-01 Technical Note - Response to Noise Officer (Dated 9th January 2026)
23-09-03A Phase I Environmental Desk Study Report (Dated September 2023)
23-09-03B Phase II Geotechnical and Geo-Environmental Report (Dated September 2023)
24-070 Issue P02 Utilities Strategy (Dated August 2025)
BNG Addendum - Response to Arup and Environment Agency Comments
Water Framework Directive Assessment Addendum Version 2.0 (Dated 23rd February 2026)
794-ENV-ECO-22815 Outline Mitigation, Enhancement and Management Plan (Dated February 2026)

Sustainability:

C2526351 Whole Life Carbon Assessment (Dated November 2025)
C2526351 Operational Energy Calculation (Dated November 2025)
C2526351 Overheating Analysis (Dated November 2025)
C2526351 Part L Calculations (Dated November 2025)
C2526351 TM54 Energy Report (Dated November 2025)
C2526351 Energy Statement (Dated 6th January 2026)

Transport:

3249/008/001 Transport Assessment Addendum (Dated November 2025)
3249/008/003 Detailed Construction Logistics Plan (Dated November 2025)
3249/008/004 Travel Plan (Dated August 2025)
3249/008/005 Delivery and Servicing Plan (Dated November 2025)
3249/008/005 Parking Design and Management Plan (Dated November 2025)

Thereafter the development shall be retained/maintained in accordance with these details 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).

4. NONSC Compliance - Restrict Use

Compliance - Restrict Use

Notwithstanding the Town and Country Planning (Use Classes) Order (as amended), or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification, the development shall not be used for any purpose other than as a community, outdoor activity and recreation centre with seasonal staff accommodation and ancillary uses (Sui Generis).

REASON

To ensure that the provisions of the development are secured to the use proposed to prevent detrimental impacts arising from an alternative use which is not permitted, including impacts on the local highway network and air quality, in accordance with Policies DMTC 1, DMT 1, DMT 2 and DMEI 14 of the Hillingdon Local Plan: Part 2 (2020), Policies T4 and SI 1 of the London Plan (2021) and the National Planning Policy Framework (2024).

5. NONSC Compliance - Seasonal Accommodation

Compliance - Seasonal Staff Accommodation

The seasonal staff accommodation hereby approved (as shown on drawing ref. 1329-HAV-Z1-ZZ-DR-A-S2-1100 P01) shall be used and occupied by staff only (Sui Generis) between 1st April and 30th September of the year. The approved seasonal staff accommodation shall not be used for the purposes of traditional Class C3 residential accommodation.

REASON

To ensure that the use approved is as intended and not for the purposes of traditional Class C3 residential accommodation which would be inappropriate and unacceptable development within the SSSI and Green Belt, in accordance with the National Planning Policy Framework (2024).

6. NONSC Compliance - Noise Limits for Normal Operation

Compliance - Noise Limits for Normal Operation

For the lifetime of the development hereby permitted the rating level (LAr) of noise caused by the building services and / or fixed plant shall not exceed:

42 dB LAr 15 min for any fifteen-minute period between 2300 and 0700, and

45 dB LAr 1 hour for any one-hour period between 0700 and 2300,

determined one metre free field external to any window or door of any permanent residential, in accordance with 'Methods for rating and assessing industrial and commercial sound' British Standards Institution BS4142 2014.

REASON

To safeguard the noise environment and the amenity of neighbours, in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) and Policy D14 of the London Plan (2021).

7. NONSC Compliance - Digital Connectivity Infrastructure

Compliance - Digital Connectivity Infrastructure

The development hereby approved shall ensure that sufficient ducting space for full fibre connectivity infrastructure is provided.

REASON

To ensure compliance with Policy SI 6 of the London Plan (2021).

8. COM10 Compliance - Tree Retention

Compliance - Tree Retention

Trees, hedges and shrubs shown to be retained on the approved plans 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 to comply with Section 197 of the Town and Country Planning Act 1990.

9. NONSC Compliance - Non-Road Mobile Machinery

Compliance - Non-Road Mobile Machinery

All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up to date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at <https://nrmm.london/>."

REASON

To comply with the London's Low Emission Zone for non-road mobile machinery as per requirements of the London Environment Strategy, in accordance with Policy EM8 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 14 of the Hillingdon Local Plan: Part 2 (2020), Policy SI 1 of the London Plan (2021) and the National Planning Policy Framework (2024).

10. NONSC Compliance - SSSI Assents and Compliance

Compliance - SSSI Assents and Compliance

Prior assent / consent procedures will be followed for any operations where this is necessary and will be managed in accordance with the approved Detailed MEMP (Condition 15). Evidence of the requisite assents/consents and any conditions thereon shall be submitted to the Local Planning Authority on request.

REASON

To ensure compliance with Wildlife and Countryside Act 1981 (as amended) duties for SSSI protection.

11. NONSC Compliance - Prohibition of Fishing

Compliance - Prohibition of Fishing - Southern Causeway & Peninsula

No fishing shall take place from the southern causeway or within the peninsula at any time. Appropriate signage and enforcement shall be maintained for the lifetime of the development.

REASON

To reduce disturbance within the designated bird refuge area, in accordance with Policy EM7 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 7 of the Hillingdon Local Plan Part 2 (2020), Policy G6 of The London Plan (2021), and the National Planning Policy

Framework (2024).

12. NONSC Compliance - Electric Craft Speed Limit

Compliance - Electric Craft Speed Limit

All electrically driven craft used in connection with the operation of the facility shall observe a maximum speed of 3 mph, save in emergencies involving immediate safety of persons, and the operator shall maintain signage, training and enforcement to secure compliance for the lifetime of the development.

REASON

To minimise disturbance to open water bird assemblages, in accordance with Policy EM7 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 7 of the Hillingdon Local Plan Part 2 (2020), Policy G6 of The London Plan (2021), and the National Planning Policy Framework (2024).

13. NONSC Compliance - Lighting

Compliance - Lighting

All external lighting shall accord with a Lighting Strategy approved under the Detailed MEMP and OMAP (Conditions 15 and 41) and designed to avoid light spill to refuge areas, islands and woodland edges, and to protect bats, birds and other fauna. No other external lighting shall be installed without prior written approval of the Local Planning Authority.

REASON

To avoid disturbance to sensitive species and habitats associated with the SSSI, in accordance with Policy EM7 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 7 of the Hillingdon Local Plan Part 2 (2020), Policy G6 of The London Plan (2021), and the National Planning Policy Framework (2024).

14. NONSC Pre-Com - Seasonal Restrictions to Construction Works

Pre-Commencement - Seasonal Restrictions for High Noise Activities

No demolition, impact piling or other high noise/high vibration construction activities (including demolition and piling) shall take place outside the October-December window, unless otherwise agreed in writing by the Local Planning Authority in consultation with Natural England on the basis of up-to-date ornithological survey evidence demonstrating no risk of adverse effects on SSSI interest features.

REASON

To avoid disturbance during breeding and moulting periods and early/late winter stress periods, in accordance with Policy EM7 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 7 of the Hillingdon Local Plan Part 2 (2020), Policy G6 of The London Plan (2021),

and the National Planning Policy Framework (2024).

15. NONSC Pre-Com - Mitigation, Enhancement and Management Plan

Pre-Commencement - Mitigation, Enhancement & Management Plan (MEMP)

No development shall commence until a Detailed Mitigation, Enhancement and Management Plan (Detailed MEMP) for Broadwater Lake and the adjoining peninsula has been submitted to and approved in writing by the Local Planning Authority, in consultation with relevant stakeholders (including Natural England and the Environment Agency). The Detailed MEMP shall be prepared in accordance with the submitted Outline MEMP (RPS/Tetra Tech, Nov 2025) and shall include, as a minimum:

- a) A site wide habitat restoration plan covering fen/marginal, scrub, wet woodland and open water habitats, with target conditions, success criteria, and time bound actions;
- b) The full design, location and delivery programme for the mitigation and enhancement measures identified in the Outline MEMP (including: remodel Islands #2 and #6; removal of Island #7; sunken willow planters and reedbeds; creation/operation of the year round bird refuge and associated screens; peninsula woodland enhancement; Broadwater Saling Club site reinstatement; reedbeds in the eastern channel; annual vegetation management on Islands #3 and #4; tern rafts/rafts specification; gravel banks; orchard; wildlife pond; bird hide, and Invasive Non-Native Species (INNS) controls);
- c) A monitoring schedule for SSSI interest features and water quality, covering construction and operation (including breeding and wintering bird surveys and disturbance surveys at the frequencies set out in the Outline MEMP), survey methods, fixed monitoring locations, reporting format and review triggers;
- d) Adaptive management procedures, including (i) thresholds for intervention, (ii) corrective/contingency measures, (iii) a cease/suspend activity mechanism where monitoring demonstrates material risk of damage to SSSI interest features, and (iv) a route for urgent decisions between scheduled Steering Group meetings;
- e) A programme for periodic review (minimum every five years) and update;
- f) A Steering Group governance framework (membership, decision making, meeting frequency, publication of minutes and escalation), with Natural England and other statutory bodies as core members and provision for appropriate local partners;
- g) A schedule of assents/consents and permits under s28G/28H/28I of the Wildlife and Countryside Act 1981 for operations likely to damage the SSSI and the process for seeking such assents prior to works.

Any monitoring reports required pursuant to the approved Detailed MEMP shall be submitted in accordance with Condition 55.

The development shall be carried out and thereafter operated only in accordance with the approved Detailed MEMP.

REASON

To ensure delivery, monitoring and adaptive management of mitigation/enhancement necessary to avoid adverse effects on the Mid Colne Valley SSSI, in accordance with Policy DMEI 7 of the Hillingdon Local Plan: Part 2 (2020), Policy G6 of the London Plan (2021) and the National Planning Policy Framework (2024).

16. NONSC Pre-Com - Construction & Environmental Management Plan

Pre-Commencement - Construction & Environmental Management Plan (CEMP)

No development (including site clearance, demolition or other preparatory works) shall commence until a detailed Construction & Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority, in consultation with relevant stakeholders (including Natural England, the Environment Agency, the Canal & River Trust and HS2 Ltd, Affinity Water and Thames Water as relevant). The CEMP shall be consistent with the submitted outline CEMP, shall cover the entirety of the application site and any adjoining land which will be used during the construction period, and shall include (where applicable):

General Construction Controls

- a) A construction programme and phasing plan, including a 24-hour emergency contact number and a procedure for recording, investigating and responding to complaints;
- b) A seasonal construction programme to avoid demolition, piling and other high noise/vibration activities during sensitive periods for SSSI interest features, unless otherwise agreed in writing with Natural England based on updated survey evidence;
- c) The hours of work for demolition and construction activities (including, where relevant, deliveries/collections and the operation of plant), and arrangements for any works required outside those hours;
- d) Details of on-site plant and equipment (including location, screening where relevant, and measures to minimise noise, vibration, dust and emissions), and procedures for its safe storage, operation and maintenance;

Ecological & Environmental Controls

- e) Measures to ensure a functioning, year-round refuge area on the lake during construction (including spatial definition, exclusion of access, temporary marker systems, enforcement and site induction), and construction-phase visual and noise screening to protect birds;

f) Monitoring during construction (including any agreed control tests, reference locations and thresholds for behavioural response) to enable adaptive mitigation in real time and reporting arrangements to the Local Planning Authority and consultees, as appropriate;

g) Ecological and environmental management arrangements, including an Ecological Clerk of Works (ECoW) (and any other specialists as required), toolbox talks and site inductions, a pre-commencement check for nesting birds, incident reporting and a stop-works protocol;

h) Measures to minimise the potential for noise and vibration disturbance;

Pollution, Drainage & Materials Controls

i) Air quality mitigation measures, including dust suppression, and measures to control the emission of dust and dirt during construction, in line with the requirements of the Control of Dust and Emissions during Construction and Demolition SPG;

j) Wheel-washing facilities and associated measures to prevent mud and debris being deposited on the public highway;

k) Site drainage control measures and pollution prevention measures relating to storage and handling of fuels, oils, chemicals and other hazardous substances, including leak prevention and leak detection systems, and a spill response protocol requiring immediate notification to Affinity Water and the Environment Agency;

l) Site lighting details, including measures to avoid impacts on biodiversity (including bats) and, where cranes or other tall equipment are proposed, details of obstacle lighting;

Tree, Landscape & Habitat Controls

m) Tree protection measures in accordance with BS 5837:2012 and details of the siting, design and maintenance of security hoardings;

n) Details of ecological mitigation measures, including any specific mitigation in relation to breeding/foraging black redstart (if relevant);

Waste, UXO, CCS & HS2 Interface

o) A scheme for managing, recycling and disposing of waste arising from demolition and construction in accordance with the waste hierarchy and circular economy principles;

p) An Unexploded Ordnance (UXO) assessment to be undertaken and any required mitigation implemented;

q) Details of how the contractor will be registered with and comply with the Considerate Constructors Scheme (or equivalent);

r) Arrangements to demonstrate how any concurrent construction with HS2 works shall not impede the construction of the HS2 works and how HS2 assets will be safeguarded throughout the construction period.

Groundwater Monitoring & Protection

s) A detailed groundwater monitoring plan including: sampling and analytical schedules, monitoring locations and depths, frequency of sampling, procedures for maintenance and decommissioning of monitoring installations, a schedule for interim and final reporting to the Local Planning Authority and Environment Agency, and a contingency plan specifying corrective actions triggered by adverse trends.

Piling / Foundation Works

t) A Piling and Foundation Works Risk Assessment including: a conceptual site model, pile type, number and depth, assessment of groundwater pollution scenarios, a monitoring plan (pre-, during, and post-piling), a reporting schedule, and a contingency plan specifying responses to groundwater deterioration.

Horizontal Directional Drilling (HDD)

u) A HDD Environmental Risk Assessment including: assessment of proposed drilling fluids (e.g. bentonite/polymer), a conceptual site model, groundwater monitoring plan and reporting schedule, a contingency and spill response plan for HDD failures, and measures to prevent pollutant transport between geological layers.

Sewage Pumping Station & Pipeline Pollution Controls

v) Detailed design and pollution prevention measures for any foul pumping station and pipelines including: sewage pipework and tank specifications, pollution control and leak detection systems, monitoring and maintenance schedules.

In-Lake Works Seasonal Restriction

w) No works within Broadwater Lake (including dredging, bank reprofiling, sub-waterline works, installation/removal of structures or floating habitat) shall take place outside October-December inclusive, unless agreed in writing by the Local Planning Authority in consultation with the Environment Agency, supported by updated ecological and water quality evidence.

The development shall thereafter be carried out in strict accordance with the approved CEMP.

REASON

To protect ecological and other environmental receptors (including the Broadwater Lake

SSSI and the Grand Union Canal), safeguard amenity, minimise impacts from construction activities, and safeguard HS2 assets and the HS2 Phase One programme, in accordance with Policies DMEI 7 and DMEI 14 of the Hillingdon Local Plan: Part 2 (2020), Policies G6, D14 and SI 1 of the London Plan (2021), the National Planning Policy Framework (2024) and the HS2 Safeguarding Directions. This is also to ensure that construction works and construction equipment (including cranes and other tall plant) do not obstruct air traffic movements or otherwise impede the effective operation of air traffic navigation transmitter/receiver systems, in accordance with Policy DMAV 1 of the Hillingdon Local Plan: Part 2 (2020).

17. NONSC Pre-Com - Construction Logistics Plan

Pre-Commencement - Construction Logistics Plan (CLP)

No development (including site clearance, demolition or other preparatory works) shall commence until a detailed Construction Logistics Plan (CLP) has been submitted to and approved in writing by the Local Planning Authority (in consultation with HS2 Ltd, Transport for London and any other relevant stakeholders). The CLP shall accord with Transport for London's Construction Logistics Planning Guidance (or any successor document), shall cover the entirety of the application site and any adjoining land which will be used during the construction period, and shall include (where applicable):

- a) A forecast programme and the number/type/timing of construction trips (including HGVs), with measures to avoid peak periods;
- b) A booking / call-forward system for deliveries and collections, including any consolidated, re-timed or re-routed trips;
- c) HGV routing (including enforcement measures) and temporary traffic management and signage proposals;
- d) Secure on-site arrangements for loading/unloading, deliveries and drop-off/pick-up, including wheel-washing arrangements and use of an on-site banksman where necessary;
- e) Details of parking for site operatives and visitors and measures to ensure satisfactory access and movement for existing occupiers of neighbouring properties during construction;
- f) Use of logistics and consolidation centres (including any proposals for consolidation to reduce HGV movements) and collaboration with other sites in the area, where applicable;
- g) Proposals for the use of water for freight (where feasible) and measures to re-use materials on site where practicable;
- h) A staff travel plan (including measures to encourage active travel) and, where relevant, commitments to achieve FORS Gold standard and 5* Direct Vision Standard (or any successor standards);

- i) The proposed vehicle types and sizes, frequency of visits, and hours of arrivals and departures for staff and deliveries;
- j) Arrangements to demonstrate how construction traffic and associated logistics activities will not impede HS2 works and will safeguard HS2 assets, where relevant;
- k) Arrangements for monitoring, review and updating of the CLP throughout the construction period, including how compliance will be managed and evidenced.

The development shall thereafter be carried out in strict accordance with the approved CLP.

REASON

To ensure construction traffic and servicing are appropriately managed to protect highway safety and the safe and efficient operation of the local highway network, to safeguard amenity and air quality, and to safeguard HS2 assets and the HS2 Phase One programme, in accordance with Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 (2020), Policies T4 and T7 of the London Plan (2021) and the HS2 Safeguarding Directions.

18. NONSC Pre-Com - Groundworks, Excavations, Piling and Dredging

Pre-Commencement - Groundworks, Excavations, Piling and Dredging

Prior to the commencement of any development involving excavation, piling or dredging, a Groundworks and Dredging Methodology shall be submitted to and approved in writing by the Local Planning Authority, in consultation with relevant stakeholders (including the Environment Agency, Affinity Water and Thames Water). The Methodology shall include:

Foundations & Excavations

- a) A Foundations Works Method Statement and Risk Assessment detailing the depth and type of all excavations (including piling), together with mitigation measures such as turbidity monitoring, piling design, and off site monitoring boreholes to prevent migration of pollutants to the public water supply.

Dredging

- b) A Dredging Method Statement identifying the maximum depth of dredging and the precise locations within the lake where dredging is proposed.

Groundwater Protection

- c) Measures to ensure that excavations and dredging do not enhance connectivity between superficial deposits, surface waters and the Chalk aquifer.
- d) Written confirmation that Affinity Water will be notified a minimum of 15 days prior to the commencement of any piling or excavation.

Groundwater Monitoring Programme

e) A detailed groundwater monitoring programme including: sampling/analytical schedules, monitoring locations and frequency, maintenance and decommissioning requirements, schedule for interim and final reports, contingency action plan for adverse monitoring results.

Piling Risk Assessment

f) A Piling/Foundation Works Risk Assessment including: conceptual site model, pile type/number/depth, groundwater pollution scenario assessment, monitoring plan and reporting schedule, contingency plan for groundwater quality deterioration.

g) A requirement that any piling works shall take place outside the period June-August, unless otherwise agreed in writing by the Local Planning Authority in consultation with Affinity Water.

Horizontal Directional Drilling (HDD) Method Statement

h) A HDD Environmental Risk Assessment including: risk assessment of drilling fluids (e.g. bentonite), conceptual site model, groundwater monitoring plan, contingency plan for HDD release/loss of fluids, timing/phasing.

Foul Pumping Station Pollution Controls

i) Details of pollution control measures for the foul pumping station including: pipework/tank specification, pollution prevention systems, monitoring/maintenance schedule.

The development shall be carried out strictly in accordance with the approved Methodology.

REASON

To protect groundwater resources and the public water supply by preventing the mobilisation or migration of contaminants as a result of excavation, piling or dredging, in accordance with Policies DMEI 11 and DMEI 12 of the Hillingdon Local Plan: Part 2 (2020).

19. NONSC Pre-Com - Contaminated Land Remediation Strategy

Pre-Commencement - Contaminated Land, Remediation Strategy and Unexpected Contamination

No development (excluding demolition, site clearance and initial ground investigations) shall commence until a Comprehensive Remediation Strategy has been submitted to and approved in writing by the Local Planning Authority, in consultation with relevant stakeholders (including the Environment Agency, Affinity Water and Thames Water). The Strategy shall include:

Site Investigation & Risk Assessment

- a) A site investigation incorporating soil, soil gas, surface water and groundwater sampling, together with a full risk assessment prepared by a suitably qualified and accredited specialist.
- b) An updated Preliminary Risk Assessment (PRA) and updated conceptual site model, incorporating findings from all investigation phases completed to date.
- c) Additional intrusive investigation, where the updated PRA identifies limitations in existing data.
- d) A tiered quantitative risk assessment, using the results of intrusive investigations to assess risks to all receptors, including controlled waters.

Remediation Design & Verification

- e) Details of all proposed remediation measures and a Method Statement explaining how completion of remedial works will be verified.
- f) An options appraisal, including sustainability and treatability assessments of potential remediation techniques.
- g) A detailed Remediation Strategy and Verification Plan, describing performance criteria, monitoring requirements, and verification procedures.

Watching Brief

If contamination not previously identified is found at any stage of development or remediation, works in the affected area shall cease and an Addendum Remediation Strategy shall be submitted to and approved by the Local Planning Authority prior to commencement.

Verification

Following completion of the remediation works, a Verification Report shall be submitted to and approved in writing by the Local Planning Authority prior to occupation or use of any part of the development.

Imported Soils

All imported soils shall be clean, free from contamination, and independently tested prior to use. Test results and interpretive reports shall be submitted to and approved in writing by the Local Planning Authority before the soils are brought onto site.

REASON

To ensure the safe development of the site, to protect future occupiers and neighbouring land, and to prevent pollution of controlled waters and the public water supply, in accordance with Policies DMEI 11 and DMEI 12 of the Hillingdon Local Plan: Part 2 (2020).

20. NONSC Pre-Com - Surface Water Drainage Scheme

Pre-Commencement - Surface Water Drainage Scheme

Prior to the commencement of development, a Final Surface Water Drainage Scheme shall be submitted to and approved in writing by the Local Planning Authority, in consultation with relevant stakeholders (including the Environment Agency, Affinity Water, Thames Water and Natural England). The Scheme shall:

- a) Incorporate sustainable drainage measures that prevent the mobilisation of contaminants;
- b) Exclude infiltration drainage in any areas of known or suspected contamination;
- c) Demonstrate protection of groundwater and the public water supply during both the construction and operational phases.

The development shall be carried out strictly in accordance with the approved scheme.

REASON

To ensure that surface water drainage does not mobilise contaminants into groundwater or enhance pathways to the Chalk aquifer, in accordance with Policies DMEI 11 and DMEI 12 of the Hillingdon Local Plan: Part 2 (2020).

21. NONSC Pre-Com - Broadwater Sailing Club Area Contamination

Pre-Commencement - Broadwater Sailing Club Area (Unexpected Contamination)

If, during works to the existing Broadwater Sailing Club buildings, contamination not previously identified is discovered, all development on the northern bank of the lake shall cease until:

- a) An Intrusive Ground Investigation has been undertaken to assess risks and identify appropriate techniques to prevent the displacement of shallow contamination to greater depths; and
- b) A remediation and monitoring plan has been submitted to and approved in writing by the Local Planning Authority, in consultation with relevant stakeholders (including Environment Agency, Affinity Water, Thames Water and Natural England).

The works shall thereafter be carried out in accordance with the approved details.

REASON

To protect the Chalk aquifer and avoid impacts on public water supply arising from disturbance of previously unidentified contamination, in accordance with Policies DMEI 11 and DMEI 12 of the Hillingdon Local Plan: Part 2 (2020).

22. NONSC Pre-Com - Lake Restoration Strategy

No development within 8m of the lake shoreline or work within the lake itself shall take place until a detailed Lake Restoration Strategy has been submitted to and approved in writing by the Local Planning Authority, in consultation with relevant stakeholders (including the

Environment Agency and Natural England). The Lake Restoration Strategy shall be carried out as approved and any subsequent variations shall be agreed in writing by the Local Planning Authority.

The Lake Restoration Strategy must include the following details:

- a) The confirmed length/area of lake edge to be improved
- b) The planned timeframes for each phase of the restoration work
- c) Details of the planned long-term water quality monitoring including proposed trigger levels relating to erosion, vegetation establishment, turbidity, chemical parameters or biological indicators, and a proposal for investigation and remediation if these levels are exceeded.
- d) The outline designs for each phase of the long-term restoration proposal, clearly demonstrating the Water Framework Directive quality element that is being mitigated.
- e) The designs should include cross sections of the proposed reprofiling and indicative details of the materials to be used.

The development shall thereafter be carried out in full accordance with the approved Lake Restoration Strategy, and all measures shall be retained, monitored, and maintained for the lifetime of the development.

REASON

To ensure WFD compliance of the development and prevent the deterioration of/jeopardise the attainment of good status of Broadwater Lake, ID: GB30641907, in line with the submitted Water Framework Directive Assessment_Addendum_2.0 proposals. To ensure the protection of wildlife and supporting habitat. Also, to secure opportunities for enhancing the site's nature conservation value, in accordance with Policy EM7 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 7 of the Hillingdon Local Plan Part 2 (2020), Policy G6 of the London Plan (2021), and the National Planning Policy Framework (2024).

23. NONSC Pre-Com - Legally Protected Species - European Eel

Pre-Commencement - Legally Protected Species Plan - European Eel

No development shall take place until a European Eel Protection Plan detailing the mitigation of damage to populations of European eel, a protected species under Eel (England and Wales) Regulations 2009, and their associated habitat has been submitted to and approved in writing by the Local Planning Authority, in consultation with relevant stakeholders (including the Environment Agency and Natural England). The Plan must consider the whole duration of the development, from the construction phase through to development completion. Any change to operational responsibilities, including management, shall be submitted to and approved in writing by the Local Planning Authority. The European Eel protection plan shall be carried out in accordance with a timetable for implementation as approved.

It shall include the following elements:

- a) Outline how any compensatory measures and mitigations are explicitly intended to benefit

European eel.

- b) Details about the location, extent and design of marginal habitat enhancement with reference to their benefit for eels.
- c) Details about the location, extent and design of artificial submerged refuge structures with reference to their benefit for eels.
- d) Details of a scheme for the long-term management and protection of the European eel population and its associated habitat.

The development shall be carried out in full accordance with the approved European Eel Protection Plan.

REASON

To protect the European eel and its habitat within the development site, and to avoid damaging the site's nature conservation value, in accordance with Policy EM7 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 7 of the Hillingdon Local Plan Part 2 (2020), Policy G6 of the London Plan (2021), and the National Planning Policy Framework (2024).

24. NONSC Pre-Com - Legally Protected Species - Water Vole

Pre-Commencement - Legally Protected Species Plan - Water Vole

No development shall take place until a plan detailing the protection of populations of Water Vole, a protected species under The Wildlife and Countryside Act 1981 as amended and their associated habitat has been submitted to and approved in writing by the Local Planning Authority, in consultation with relevant stakeholders (including the Environment Agency and Natural England). The plan must consider the whole duration of the development, from the construction phase through to development completion. Any change to operational responsibilities, including management, shall be submitted to and approved in writing by the Local Planning Authority. The Water Vole protection plan shall be carried out in accordance with a timetable for implementation as approved.

The scheme shall include the following elements:

- a) A detailed precautionary method statement to protect this species throughout the construction phase. This should include a pre-commencement check for field signs in accordance with the Water Vole Mitigation Handbook and CIEEM guidance in any areas on the lake shore where construction will take place or impact habitat.
- b) Details of the habitat improvements proposed for the operational phase designed to increase structural diversity of the habitat, improve burrowing opportunities and expand marginal foraging habitat relative to the existing baseline. These include removal of artificial shoreline structures at the former Sailing Club frontage; reprofiling of selected banks to create gentler gradients; enhancement and expansion of marginal vegetation; and island edge reprofiling (as proposed within the outline MEMP)
- c) Details of the proposed long-term riparian management that ensure Water Vole are considered and protected (this may include control of American Mink and ongoing surveys post development).

The development shall be carried out in full accordance with the approved Water Vole Protection Plan.

REASON

To protect the Water Vole and its habitat within the development site, and to avoid damaging the site's nature conservation value, in accordance with Policy EM7 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 7 of the Hillingdon Local Plan Part 2 (2020), Policy G6 of the London Plan (2021), and the National Planning Policy Framework (2024).

25. NONSC Pre-Com - Continuity of Sports

Pre-Commencement - Continuity of Sports (Sport England)

No development shall commence until a scheme for the continuity of the existing sports use of the Broadwater Sailing Club facilities during construction has been submitted to and approved in writing by the Local Planning Authority (in consultation with Sport England). The scheme must set out details of the size, location, type and make-up of the facilities together with arrangements for access during construction. The scheme must include a timetable for the provision of the replacement facilities.

The approved scheme shall be implemented and complied with in full throughout the implementation of the development.

REASON

To protect sports facilities from damage, loss or availability of use during the construction of the development and to accord with Policy S5 of the London Plan (2021) and Paragraph 104 of the National Planning Policy Framework (2024).

26. NONSC Pre-Com - Bridge 179

Pre-Commencement - Bridge 179

No works to Bridge 179, or any works involving utilities crossing over or under the Grand Union Canal, shall commence until full details of the proposed bridge works and associated service connections have been submitted to and approved in writing by the Local Planning Authority, (in consultation with the Canal & River Trust). The submitted details shall include:

- a) A detailed Heritage Assessment of the existing bridge structure;
- b) A full bat roost assessment and method statement;
- c) Detailed design drawings showing all temporary and permanent works;
- d) Detailed construction methodology, including compliance with the Canal & River Trust "Code of Practice for Works Affecting the Canal & River Trust";
- e) Method and alignment of all utilities/service crossings, including Horizontal Directional Drilling details;
- f) Details of temporary and permanent lighting;

- g) Measures to ensure safe clearance from the bridge to the waterway and towpath;
- h) Future ownership, management and maintenance responsibilities for all works.

Thereafter the development shall be constructed in accordance with the approved details and be retained as such.

REASON

To ensure the protection of the Grand Union Canal, safeguard navigation, protect the non-designated heritage asset interest, ensure ecological protection (including bats), and avoid adverse impacts on the structural integrity and amenity of the waterway, in accordance with Policies HE1, EM3 and EM7 of the Hillingdon Local Plan: Part 1 (2012), Policies DMHB 1, DMEI 7, DMEI 8 of the Hillingdon Local Plan: Part 2 (2020), Policies G6, SI 7 and HC1 of the London Plan (2021) and National Planning Policy Framework (2024).

27. NONSC Pre-Com - Materials and Elevational Details

Pre-Commencement - Materials and Elevational Details

Prior to the commencement of superstructure works for the development, a Materials and Elevational Details Schedule shall be submitted to and approved in writing by the Local Planning Authority. The schedule shall include:

- a) External walling (including flint and areas of standing seam zinc where the roof "turns down" onto walls), with sample panels on site;
- b) Roofing (including zinc colour/finish specification and profiles);
- c) Curtain walling and all other glazed systems (including framing sightlines, colours, spandrels, solar control);
- d) All exposed metalwork (including balustrades, gates and structure) with RAL/finish;
- e) Parapets, copings, soffits, gutters and downpipes; and
- f) A 1:20/1:10 key bay detail for each principal elevation demonstrating the junction of wall, roof, glazing and any roof "turn-down".

Thereafter the development shall be constructed in accordance with the approved details prior to occupation and be retained as such.

REASON

To secure a robust, context appropriate palette (flint/zinc) and coherent detailing that avoids a commercial appearance and ensures longevity, as explained in the applicant's response, in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

28. NONSC Pre-Com - Windows, Doors and Framing

Pre-Commencement - Windows, Doors and Framing

Prior to the commencement of superstructure works for the development, typical window and door details (minimum 1:10 vertical and horizontal sections) shall be submitted to and

approved in writing by the Local Planning Authority. Details shall include frame depth, profiles, finishes, reveals, cills, lintols and interfaces with flint/zinc.

Thereafter the development shall be constructed in accordance with the approved details prior to occupation and be retained as such.

REASON

To ensure high quality openings and appropriate junctions where flint construction demands robust framing, in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

29. NONSC Pre-Com - Safety Zone

Pre-Commencement - Safety Zone - Photovoltaic Integration & Yard Cover

Prior to installing any rooftop photovoltaics or the partially covered Safety Zone yard roof, final design details shall be submitted to and approved in writing by the Local Planning Authority. The final design details shall show:

- a) The PV arrays' extent, fixing method, pitch and alignment flush with roof planes, visual integration measures, and maintenance access (Safety & Camp buildings);
- b) The yard's exposed structure and roof materials, demonstrating a coherent relationship with the flint walls and minimising visual bulk on key elevations.

Thereafter the development shall be constructed in accordance with the approved details prior to occupation and be retained as such.

REASON

To ensure the photovoltaics arrays and the cut-out yard roof are visually recessive, safe to maintain and compatible with the design language, in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

30. NONSC Pre-Com - Camp Zone

Pre-Commencement - Camp Zone - Seasonal Shelter & Massing Control

Notwithstanding the approved drawings and prior to the commencement of above ground construction works for the development, final design details of the Camp Zone shall be submitted to and approved in writing by the Local Planning Authority. The final design details shall show:-

- a) Only the changing block has a permanent roof (height as revised); and
- b) The activity shelter is an open structure with seasonal tensile cover (removable), and details of fixings, materials and edge treatment.

Thereafter the development shall be constructed in accordance with the approved details prior to occupation and be retained as such.

REASON

To reduce building mass, respect Green Belt openness, support inclusive use in varied weather while retaining the "seasonal" character, in accordance with Policies DMEI 4 and DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

31. NONSC Pre-Com - Ancillary Structures and Public Realm Details

Pre-Commencement - Ancillary Structures and Public Realm Details

Notwithstanding the approved plans and prior to the commencement of above ground construction works, comprehensive final design details of all small ancillary structures and minor public realm elements shall be submitted to and approved in writing by the Local Planning Authority. The submission shall include plans, elevations, materials and finishes for: (i) the bin store; (ii) the bike shelter; (iii) anglers' huts; and (v) any other minor buildings or structures, together with public realm enhancements to the arrival/coach bay area.

The submission shall also include an assessment of alternative siting options for the cycle store, demonstrating reasonable exploration of opportunities to relocate the cycle store to a position closer to the main buildings within the Operational Zone and/or Safety Zone, to improve passive surveillance, user safety and convenience. The assessment shall also set out the feasibility of providing a dedicated delivery and servicing bay in the space made available by relocating the cycle store, including swept path analysis and measures to avoid conflict with pedestrians, coaches, minibuses, and other operational movements.

The details shall demonstrate:

- a) A consistent rural appropriate palette coordinated with the main buildings, including justification where zinc substitutes for traditional timber boarding on durability or maintenance grounds;
- b) For cycle storage, a single row layout should be provided where feasible, including weather protection, safe access, and materials/finishes for all storage structures;
- c) A clear evaluation of relocation options for the cycle store nearer to the main buildings, and where feasible the incorporation of a dedicated delivery and servicing bay within the arrival/car park area, in replacement of the existing cycle parking footprint;
- d) Siting of the anglers' store/WC that avoids Root Protection Zones, minimises vegetation loss, limits visual prominence, and confirms utilities routing;
- e) Arrival sequence enhancements including additional trees (where they do not compromise manoeuvring or existing vegetation), wayfinding, and low level softening to define the coach bay environment.

The development shall be carried out in accordance with the approved details prior to first occupation and shall be retained as such thereafter.

REASON

To secure a coherent family of rural character structures, minimise visual and spatial impact, protect existing trees and landscape features, ensure safe and legible arrival sequences, improve the safety and surveillance of cycle parking, and optimise opportunities for a

dedicated servicing bay, in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

32. NONSC Pre-Com - Tree/Biodiversity Protection from Activity Areas

Pre-Commencement - Tree/Biodiversity Protection from Activity Areas

No installation of land based activity structures shall occur until a Land Based Activities Method Statement is approved, to include:

- a) Caving area specification confirming an above ground "stacked tube" system placed on existing surface, with any foundations hand dug where within Root Protection Zones;
- b) Confirmation that previously omitted high-disturbance features (e.g., zip-line, big-swing) remain excluded;
- c) Plans/sections for any remaining low level apparatus beneath the woodland canopy, demonstrating no intrusive footings and protection of ecological corridors.

Thereafter the development shall be constructed in accordance with the approved details prior to occupation and be retained as such.

REASON

To control detailed design of activity infrastructure, prevent reinstatement of high disturbance items, and protect trees/biodiversity, in accordance with Policies DMEI 7, DMHB 11 and DMHB 14 of the Hillingdon Local Plan: Part 2 (2020).

33. NONSC Pre-Com - Inclusive Access

Pre-Commencement - Inclusive Access

a) Development shall not commence until details of access to building entrances (to include ramped/level approaches, signposting, types and dimensions of door width and lobby openings) to meet the needs of people with disabilities have been submitted to and approved in writing by the Local Planning Authority.

b) The development hereby approved shall accord with London Plan policy D5(B5) and D12(A) to include a minimum of one fire evacuation lift, per stair core, designed to meet the technical standards set out in BS EN 81-76, BS 9991 and/or BS 9999, with all such provisions remaining in place for the life of the development.

The approved facilities should be provided prior to the occupation of the development and shall be permanently retained thereafter.

REASON

To ensure an accessible and inclusive development for everyone and to ensure that the development can accommodate robust emergency evacuation procedures, including measure for those who require step-free egress, in accordance with Policy D5 and D12 of the London Plan (2021).

34. COM9 Pre-Com - Landscape Scheme

Pre-Commencement - Landscape Scheme

Prior to commencement of works above ground level, a comprehensive landscape scheme shall be submitted to and approved in writing by the Local Planning Authority, in consultation with relevant stakeholders (including the Canal & River Trust and Transport for London). The scheme shall be coordinated with safeguarding and security requirements, protect retained trees and their root protection areas, and demonstrate ecological permeability, and shall include the following:

a) Details of Soft Landscaping

- i) Planting plans (at not less than a scale of 1:100) and specifications, including pollution absorbing species
- ii) Written specification of planting and cultivation works to be undertaken
- iii) Schedule of plants giving species, plant sizes, tree pit designs and proposed numbers/densities where appropriate

b) Details of Hard Landscaping (including surfacing/kerb details and furniture)

- i) Tree pit sections and tree protection measures in accordance with BS5837 (as applicable)
- ii) Refuse Storage
- iii) Cycle Storage, showing secure and sheltered provision for 42 no. bicycles, including access provisions, in accordance with London Cycling Design Standards
- iv) Full details of the means of enclosure and boundary treatments, ensuring ecological permeability and including product details with materials and finish. Where any boundary treatment is proposed along the Grand Union Canal side, the details shall also include: (i) the proposed hybrid solution of hedging/hurdles and any set back mesh located behind existing vegetation; (ii) micro siting of posts to avoid tree root protection zones; (iii) measures to maintain wildlife permeability; and (iv) a method statement for installation adjacent to retained trees.
- v) Car Parking Layouts, including 56no. car parking spaces of 42 no. spaces are standard parking bays, 6 no. would be allocated as a disabled persons space, and 6 no. would be served by active electric vehicle charging points. All operational required for the buildings function shall be provided with electric vehicle charging points, including rapid charging.
- vi) Surfacing and kerb details for the car park and arrival areas (including any Grasscrete/reinforced grass in front of the Camp Zone to minimise hard surfacing, where proposed)
- vii) Hard Surfacing Materials (including the external areas and amenity areas which would be accessible to disabled people, including wheelchair users)
- viii) Other structures

c) External Lighting, Ecological Controls & Hours

- i) A sitewide external lighting scheme which demonstrates that no light spill to sensitive habitats (including woodland edges/refuge areas) and restricted hours of operation only when the site is in use, and shall include, as applicable: column locations and heights,

luminaires/optics, illuminance plots, and details of controls (including timers/sensors).

d) Details of Landscape Maintenance

- i) Landscape Maintenance Schedule for a minimum period of 5 years.
- ii) 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.

e) Schedule for Implementation

f) Other

- i) Existing and proposed functional services above and below ground
- ii) Proposed finishing levels or contours

g) Confirmation of the final Urban Greening Factor score

Thereafter the development shall be constructed in accordance with the approved details prior to occupation and be retained as such.

REASON

To ensure that the proposed development will preserve and enhance the visual amenities of the locality, protect retained trees, maintain ecological permeability and an appropriate low-light environment, and provide adequate facilities in compliance with Policies DMHB 11, DMHB 12, DMHB 14, DMT 2, DMT 6, DMEI 7 of the Hillingdon Local Plan: Part 2 (2020) and Policies G1, G5, G6, T5, T6, T6.2 and T7 of the London Plan (2021).

35. NONSC Pre-Com - Biodiversity Net Gain

Pre-Commencement - Biodiversity Net Gain

Prior to commencement of above ground works, a Biodiversity Gain Plan demonstrating 9.72% biodiversity net gain for the site shall be submitted to and approved in writing by the Local Planning Authority. The Biodiversity Gain Plan should include:

- a) Baseline Biodiversity Assessment: Using the latest Defra Biodiversity Metric, a report of the site's pre-development biodiversity value; and
- b) On-Site Enhancement and 30-year Habitat Management Plan (HMP) detailing measures to achieve BNG on-site, including species protection, habitat creation, and ongoing management strategies to maintain gains for a minimum of 30 years. The HMP should, as a minimum, include:
 - i) Description and evaluation of the features to be managed.
 - ii) Aims, objectives and targets for management.
 - iii) Description of the management operations necessary to achieving aims and objectives.
 - iv) Prescriptions for management actions.

- v) Preparation of a works schedule, including an annual works schedule.
- vi) Details of the monitoring needed to measure the effectiveness of management.
- vii) Details of the timetable for each element of the monitoring programme.
- viii) Details of the persons responsible for the implementation and monitoring.
- ix) 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; or

Where a biodiversity net gain of 9.72% is not achievable on site, in addition to the Baseline Biodiversity Assessment (a), the following shall be included in the BGP:

- c) Off-Site Biodiversity Credits or Statutory Credits: Where on-site measures do not achieve the 9.72% net gain, confirmation of the purchase of off-site biodiversity credits or statutory credits must be provided, including a receipt or proof of transaction as part of the Plan.

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

REASON

To ensure the development delivers a Biodiversity Net Gain and secures the protection and effective management of the remaining habitat on site in accordance with Section 15 of the National Planning Policy Framework, Policy G6 of The London Plan (2021), and Policy DMEI 7 of the Hillingdon Local Plan Part 2 (2020).

36. NONSC Pre-Com - Flood Risk Management Details

Pre-Commencement - Flood Risk Management Details

Prior to commencement of the development (except for demolition, ground and enabling work), the final flood risk management details shall be submitted to and approved in writing by the Local Planning Authority in consultation with the relevant stakeholders (including the Environment Agency).

The scheme shall detail:

a) Pluvial Flood Displacement

- i) Demonstration, using final modelling and design drawings, that the development will not displace pluvial floodwater off-site, in accordance with the Flood Risk, Drainage and Sequential Assessment, and that compensatory storage is secured such that there is no net loss of flood storage volume at any time.
- ii) Confirmation that the mitigation measures identified in the FRA are secured, including: provision of compensatory storage through lakebed lowering and cut-and-fill balance; implementation of island removal and dredging works to achieve a net increase in open water and flood storage capacity; evidence that peak lake water levels under the proposed scenario remain within acceptable tolerances compared with the existing scenario.

b) Groundwater Flooding

- i) Confirmation that groundwater monitoring is to be undertaken (with preference for winter period data), together with final details of any required mitigation measures to address groundwater emergence, groundwater level rise, or groundwater dependent pathways.
- ii) Details of how construction phase operations will prevent the mobilisation of contaminants via groundwater pathways, consistent with EA requirements.

c) Sewer Flooding

- i) A final assessment of sewer flooding risk, including final mitigation measures to prevent surcharge, backflow, or exceedance flows affecting the site or surrounding land, consistent with the FRA.

d) Implementation

- i) A programme setting out when each flood risk mitigation measure will be delivered, ensuring completion prior to first occupation unless otherwise agreed in writing by the Local Planning Authority.

Thereafter the development shall be implemented and retained/maintained in accordance with these details, prior to occupation of the development, for as long as the development remains in existence.

REASON

To ensure the development does not increase flood risk, in compliance with Policy EM6 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part 2 (2020), Policy SI 12 and SI 13 of the London Plan (2021), the National Planning Policy Framework (2024), and Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

37. NONSC Pre-Com - Sustainable Drainage Scheme Details

Pre-Commencement - Sustainable Drainage Scheme Details

Prior to commencement of the development (except for demolition, ground and enabling work) a sustainable water management scheme for the development shall be submitted to and approved in writing by the Local Planning Authority in consultation with the relevant stakeholders. The scheme shall clearly demonstrate how it manages water and demonstrate ways of controlling the surface water on site by providing information on:

a) Sustainable Drainage features:

- i) Surface water discharge - the submitted drainage strategy must identify the proposed method and location of discharging collected surface water from the site in accordance with the hierarchy set out in Policy SI 13 of the London Plan (2021). Where the proposal does not utilise the most sustainable solution, justification must be provided.

ii) SuDS - the submitted drainage strategy should incorporate Sustainable Drainage System (SuDS) elements that are embedded, where practicable, within the landscaping plan for the development. Preference should be given to above-ground SuDS elements that control water at source and provide wider biodiversity, water quality and amenity benefits.

iii) Runoff rates - provide the greenfield and proposed runoff rates for a variety of return periods including 1 in 1 year, 1 in 30, 1 in 100, and 1 in 100 plus 40% climate change. Developments should aim to meet greenfield runoff rates unless a suitable justification can be provided.

iv) Drainage calculations - include calculations to demonstrate that the volume of storage and size of drainage features provided is adequate to control surface water for a range of storm duration and rainfall intensities for the entire site area for events up to and including the critical 1 in 100 plus 40% climate change rainfall event.

v) Exceedance routes - provide a plan showing the route surface water will take through the development for rainfall events exceeding the 1 in 100 year event. Where it is intended to store water on the ground surface, the maximum extent of overland flooding should be mapped and the depth of the flooding confirmed. Safe access and egress for the site must be demonstrated.

b) Long-term management and maintenance of the drainage system.

i) Provide a Management and Maintenance Plan for the drainage system that includes clear plans showing all of the drainage network above and below ground, and identifies the responsibility of different parties for each component of the drainage network.

ii) Include details of the necessary inspection regimes and maintenance frequencies.

Thereafter the development shall be implemented and retained/maintained in accordance with these details, prior to occupation of the development, for as long as the development remains in existence.

REASON

To ensure that surface water run off is controlled and to ensure the development does not increase flood risk, in compliance with Policy EM6 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part 2 (2020), Policy SI 12 and SI 13 of the London Plan (2021), the National Planning Policy Framework (2024), and Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

38. NONSC Pre-Com - Water Infrastructure Details

Pre-Commencement - Water Infrastructure Details

Prior to the commencement of the development (not including demolition and site clearance), water infrastructure details shall be submitted to and approved in writing by the

Local Planning Authority. This detail shall:-

- a) achieve at least the BREEAM excellent standard for the 'Wat 01' water category160 or equivalent;
- b) incorporate measures such as smart metering, water saving and recycling measures, including retrofitting, to help to achieve lower water consumption rates and to maximise future-proofing;
- c) seek to improve the water environment and ensure that adequate wastewater infrastructure capacity is provided; and
- d) take action to minimise the potential for misconnections between foul and surface water networks.

The development must proceed and be occupied in accordance with the approved scheme.

REASON

To ensure compliance with Policy SI 5 of the London Plan (2021).

39. NONSC Pre-Occ - Sustainable Drainage Scheme Verification

Pre-Occupation - Sustainable Drainage Scheme Verification

Prior to first occupation of the development, evidence (photographs and installation contracts) to demonstrate that the sustainable drainage scheme for the site has been completed in accordance with the submitted details shall be submitted to and approved in writing by the Local Planning Authority. The sustainable drainage scheme shall be managed and maintained thereafter in accordance with the agreed management and maintenance plan for all the proposed drainage components.

REASON

To ensure that surface water run off is controlled and to ensure the development does not increase flood risk, in compliance with Policy EM6 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part 2 (2020), Policy SI 12 and SI 13 of the London Plan (2021), the National Planning Policy Framework (2024), and Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

40. NONSC Pre-Occ - Steering Group Establishment & Function

Pre-Occupation - Steering Group Establishment & Function

Prior to first occupation of the development, the applicant shall establish the Steering Group identified in the Outline MEMP. The Group shall include, as core members, Natural England, the Environment Agency, HS2, the Canal & River Trust; and provide for representation from appropriate local partners. The Group shall meet at least quarterly for the first two years of operation and at least biannually thereafter, and shall have remit to:

- a) Oversee implementation of the MEMP/OMP, monitoring and reporting;

- b) Make recommendations/decisions on adaptive measures and urgent responses to monitoring;
- c) Endorse the 5 yearly review and updates to the Detailed MEMP/OMAP;
- d) Publish summary minutes and annual statements of progress.

The facility shall be operated in accordance with any adaptive measures agreed by the Steering Group and approved by the Local Planning Authority where relevant.

REASON

To secure effective, timely and transparent governance of SSSI protection and site management, in accordance with Policy EM7 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 7 of the Hillingdon Local Plan Part 2 (2020), Policy G6 of The London Plan (2021), and the National Planning Policy Framework (2024).

41. NONSC Pre-Occ - Operational Management and Activities Plan

Pre-Occupation - Operational Management & Activities Plan (OMAP)

Prior to the first occupation of any building or the commencement of any water based or land based activity, a consolidated Operational Management & Activities Plan (OMAP) shall be submitted to and approved in writing by the Local Planning Authority, in consultation with relevant stakeholders (including Natural England and the Environment Agency). The OMAP shall incorporate and give effect to the requirements of the Detailed MEMP (Condition 15) and shall comprise, without limitation, the following:

a) Operational Management Requirements

- i) Day-to-day disturbance minimisation controls, including staffing arrangements, site rules and enforcement procedures, staff/user induction processes, signage strategies, user agreements, and complaints handling mechanisms.
- ii) Definition, mapping, operation and maintenance of the Bird Refuge, comprising: a minimum of 14.7 ha undisturbed open water as per the Outline MEMP, physical demarcation features (e.g., sunken willows/marker lines, reedbeds/screens), access restrictions, and ongoing maintenance arrangements.
- iii) Disturbance control measures, including: no fishing from the southern causeway and peninsula; a 3 mph speed limit for electrically driven craft (other than in genuine emergencies); visual and acoustic screening at the woodland/camping edge; access management measures including gates, fencing, and associated security as set out in the Outline MEMP.
- iv) Operational monitoring programme covering breeding and wintering birds, disturbance surveys, reporting arrangements to the Steering Group, the Local Planning Authority, and Natural England, and adaptive management triggers, including temporary cessation of specific activities if monitoring indicates material risk or harm.

b) Land Based Activities Schedule

The OMAP shall include a definitive Schedule of Land Based Activities, which shall:

- i) Exclude high disturbance activities expressly removed from the proposal (including the zip line and big swing), as well as any other activity identified by the Steering Group as incompatible with SSSI protection.
- ii) Specify, for each permitted land based activity: geographic location, maximum participant numbers, hours of operation, and any applicable seasonal restrictions.
- iii) Set out a formal mechanism for adding, modifying, or removing activities, subject to review by the Steering Group and appropriate assessment against the MEMP and the OMAP, and subject to approval by the Local Planning Authority in consultation with Natural England.

Only those land based activities listed as "permitted" within the approved OMAP may be undertaken on the site unless otherwise agreed in writing by the Local Planning Authority in consultation with Natural England.

Where operational monitoring is required under the approved OMAP, the submission and approval of such monitoring shall be undertaken in accordance with Condition 55.

The facility shall be operated at all times in full accordance with the approved OMAP, including all operational controls, Bird Refuge measures, monitoring requirements, and limitations on land based activities.

REASON

To ensure that operational and activity based controls protect the SSSI features, to remove or restrict activities that may cause undue disturbance, and to maintain adaptive management throughout the life of the development, in accordance with Policy EM7 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 7 of the Hillingdon Local Plan Part 2 (2020), Policy G6 of the London Plan (2021), and the National Planning Policy Framework (2024).

42. NONSC Pre-Occ - Delivery of Key Physical Mitigation

Pre-Occupation - Delivery of Key Physical Mitigation

Prior to first occupation of the development, the following mitigation measures shall be completed and made operational in accordance with the approved Detailed MEMP (Condition 15):

- a) Demarcation and screening between the sailing area and bird refuge (sunken willows, floating reedbeds and any marker lines);
- b) Visual disturbance screens along the western edge of the woodland/camping zone;
- c) Navigation and open water adjustments (remodel Islands #2 and #6; removal of Island #7) where specified to offset land reclamation and secure net open water benefit;
- d) Initial tranche of refuge habitat measures, including annual vegetation clearance on Islands #3 and #4 and installation of agreed number and specification of tern rafts; and
- e) Broadwater Sailing Club site ecological reinstatement.

Thereafter, the measures shall be retained and maintained in accordance with the Detailed MEMP.

REASON

To ensure essential physical mitigation and refuge function are in place before activity commences, in accordance with Policy EM7 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 7 of the Hillingdon Local Plan Part 2 (2020), Policy G6 of The London Plan (2021), and the National Planning Policy Framework (2024).

43. NONSC Pre-Occ - Energy Monitoring, Recording and Reporting

Pre-Occupation - Energy Monitoring, Recording and Reporting

Prior to first occupation of the development, a detailed energy monitoring, recording and reporting plan shall be submitted to and approved in writing by the Local Planning Authority. The plan shall accord with the requirements of the London Plan (policy SI2) and the GLA Energy Assessment Guidance (June 2022 or as amended) and demonstrate that the development will maximise savings in CO2 emissions from the regulated energy load in accordance with the approved energy strategy.

The development must proceed in accordance with the approved reporting structure and where there is a failure to achieve the carbon savings as set out in the energy strategy, the quantum (tCO2) shall be treated as part of the shortfall and shall result in a cash in lieu contribution in accordance with the formula set out in the S106.

REASON

To ensure the development's onsite carbon savings from regulated energy demand is achieved in perpetuity (i.e. annually over 30years) in accordance with the Policy SI2 of the London Plan (2021).

44. NONSC Pre-Occ - Overheating

Pre-Occupation - Overheating

Prior to first occupation of the development, the final Overheating Strategy shall be submitted to and approved in writing by the Local Planning Authority. The submission shall demonstrate how the development will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:

- a) reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure;
- b) minimise internal heat generation through energy efficient design;
- c) manage the heat within the building through exposed internal thermal mass and high ceilings;
- d) provide passive ventilation;

- e) provide mechanical ventilation; and
- f) provide active cooling systems.

Thereafter the development shall be constructed in accordance with the approved details prior to occupation and be retained as such.

REASON

To demonstrate that the final strategy will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy and Policy SI 4 of the London Plan (2021).

45. NONSC Pre-Occ - Fire Statement

Pre-Occupation - Fire Statement

Prior to first occupation of the development, the final comprehensive Fire Statement shall be submitted to and approved in writing by the Local Planning Authority. This should be accompanied by the Building Control Decision Notice or equivalent.

Thereafter the development shall be constructed in accordance with the approved details prior to occupation and be retained as such.

REASON

To ensure the safety of all building users in accordance with Policy D12 of the London Plan (2021).

46. NONSC Pre-Occ - External Lighting Scheme

Pre-Occupation - External Lighting Scheme

Prior to first occupation of the development, details of an external lighting scheme shall be submitted to and approved in writing by the Local Planning Authority (in consultation with the relevant stakeholders, including the Canals and River Trust). Such details shall include location, height, type and direction of light sources and intensity of illumination.

Thereafter the external lighting shall be installed prior to occupation and maintained in full accordance with the approved details.

REASONS

To ensure that biodiversity within the ecological corridor is not adversely impacted by the proposed lighting, in accordance with Policy EM7 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 7 of the Hillingdon Local Plan Part 2 (2020), Policy G6 of The London Plan (2021), and the National Planning Policy Framework (2024).

47. NONSC Pre-Occ - Wayfinding Strategy

Pre-Occupation - Wayfinding Strategy

Prior to first occupation of the development, a detailed Wayfinding Strategy shall be submitted to and approved in writing by the Local Planning Authority (in consultation with Transport for London). The Strategy shall include, but not be limited to:

- a) A site wide plan identifying all pedestrian, cyclist and vehicular routes, key destination points, activity zones and access/egress points.
- b) Details of all wayfinding measures, including signage design, size, placement, materials, mapping, directional information, accessibility features (e.g. tactile elements, colour contrast, legibility), lighting integration, and any digital wayfinding tools where relevant.
- c) Provisions for inclusive access, ensuring routes and signage accommodate all users, including people with disabilities and limited mobility.
- d) Management and maintenance arrangements, including responsibilities, inspection frequency, replacement procedures, and long term upkeep.
- e) Phasing and implementation schedule, setting out when the wayfinding measures will be installed relative to the construction programme and opening of different parts of the site.

The approved Wayfinding Strategy shall be fully implemented prior to the first public use of the site (or in accordance with the agreed phasing schedule) and shall thereafter be retained, maintained and kept in good operational condition for the lifetime of the development.

REASON

To ensure safe, legible and accessible movement throughout the site, promote sustainable travel modes, support visitor navigation, and secure a high-quality public realm in accordance with Policies D3, D5, D8 and T2 of the London Plan (2021).

48. NONSC Pre-Occ - Parking Design and Management Plan

Pre-Occupation - Parking Design and Management Plan

Prior to first occupation of the development, a Parking Design and Management Plan shall be submitted to and approved in writing by the Local Planning Authority stakeholders (in consultation with Transport for London). This shall detail car parking provision, indicating how the car parking will be designed and managed, with reference to Transport for London guidance on parking management and parking design. The plan shall specifically address management of injudicious parking on the access roads.

The Parking Management Plan shall be implemented as approved and shall remain in force for the life of the development.

REASON

To allow sufficient space for all vehicles to access the application site and neighbouring sites, and to safeguard the safety of highway users, in accordance with Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 (2020) and Policies T4 and T6 of the London Plan

(2021).

49. NONSC Pre-Occ - Delivery, Servicing & Waste Management Plan

Pre-Occupation - Delivery, Servicing & Waste Management Plan

Prior to first occupation of the development, details of a final Delivery, Servicing and Waste Management Plan shall be submitted to and approved in writing by the Local Planning Authority. This should accord with Transport for London's Delivery and Servicing Plan Guidance.

Thereafter the development shall be operated in full accordance with the approved details.

REASON

To ensure appropriate servicing of the site, to safeguard highway safety and to safeguard the free flow of traffic, in accordance with Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 (2020) and Policy T7 of the London Plan (2021).

50. NONSC Pre-Occ - Travel Plan

Pre-Occupation - Travel Plans

Prior to first occupation of the development, the final comprehensive Travel Plan for the development shall be submitted to and approved in writing by the Local Planning Authority (in consultation with Transport for London).

Thereafter the development shall be implemented and retained/maintained in accordance with these details, prior to occupation of the development, for as long as the development remains in existence.

REASON

To maximise sustainable travel and safeguard highway safety and to safeguard the free flow of traffic, in accordance with Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 (2020) and Policies T1 and T4 of the London Plan (2021).

51. NONSC Pre-Occ - Flood Warning & Evacuation Plan

Pre-Occupation - Flood Warning & Evacuation Plan

Prior to first occupation of the development, a Flood Warning & Evacuation Plan shall be submitted to and approved in writing by the Local Planning Authority.

The Flood Warning & Evacuation Plan shall be implemented as approved and shall remain in force for the life of the development.

REASON

To safeguard against flood risk, in compliance with Policy EM6 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part 2 (2020), Policy SI 12 and SI 13 of the London Plan (2021), the National Planning Policy Framework (2024), and Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

52. NONSC Pre-Occ - Secured by Design

Pre-Occupation - Secured by Design

The building(s) shall achieve 'Secured by Design' accreditation awarded by the Hillingdon Metropolitan Police Crime Prevention Design Adviser (CPDA) on behalf of the Association of Chief Police Officers (ACPO). No building shall be occupied until accreditation has been achieved.

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 ensure the development provides a safe and secure environment in accordance with Policy DMHB 15 of the Hillingdon Local Plan: Part 2 (2020) and Policy D11 of the London Plan (2021).

53. NONSC Pre-Occ - Circular Economy Monitoring Report

Pre-Occupation - Circular Economy Monitoring Report

Prior to first occupation of the development, a post construction monitoring report should be completed in line with the GLA's Circular Economy Statement Guidance. The report should be submitted to and approved by the Local Planning Authority in writing.

REASON

In the interests of sustainable waste management and in order to maximise the re-use of materials, in accordance with Policy SI 7 of the London Plan (2021).

54. NONSC Pre-Occ - Whole Life-Cycle Carbon Assessment

Pre-Occupation - Whole Life-Cycle Carbon Assessment

Prior to first occupation of the development, the post-construction tab of the GLA's Whole Life-Cycle Carbon Assessment template should be completed in line with the GLA's Whole Life-Cycle Carbon Assessment Guidance. Together with any supporting information, it should be submitted to and approved in writing by the Local Planning Authority.

REASON

In the interests of sustainable development and to maximise on-site carbon dioxide savings, in accordance with Policy SI 2 of the London Plan (2021).

55. NONSC Post-Op - Monitoring, Reporting & Adaptive Management

Post-Operation - Monitoring, Reporting & Adaptive Management Plan

From first use, the operator(s) shall implement the monitoring programme approved under the Detailed MEMP and OMAP (Conditions 15 and 41), including:

- a) Breeding bird surveys (annually during construction and for three years post construction, then biennially) and wintering bird surveys (same frequency);
- b) Disturbance surveys (monthly in April-September for the first two operational years; monthly October-February for the first two Broadwater Sailing Club operational winters);
- c) Water quality monitoring using the Freshwater Habitat Trust's condition criteria and relevant Water Framework Directive parameters at fixed locations and seasonally equivalent sampling windows;
- d) Submission of annual monitoring reports to the Local Planning Authority and Natural England, copied to the Steering Group, identifying compliance with agreed thresholds and setting out any required remedial or adaptive measures.

All monitoring reports required by this condition shall be submitted to the Local Planning Authority as applications for approval under this condition and shall not be treated as agreed, discharged or accepted unless and until approved in writing by the Local Planning Authority.

Where any monitoring identifies a material risk of adverse effects on SSSI features, the operator shall implement the approved adaptive measures and, where necessary, cease or suspend the relevant activity or activities until the Local Planning Authority, in consultation with relevant stakeholders (including the Natural England, Environment Agency and Steering Group members), confirms in writing that the identified risks have been acceptably mitigated. The relevant activity or activities shall not recommence until such written approval has been given.

The monitoring and any required adaptive management measures shall continue for the lifetime of the development, subject to periodic review in accordance with the approved Detailed MEMP (Condition 15).

REASON

To verify effectiveness and ensure timely intervention to protect SSSI features, in accordance with Policy EM7 of the Hillingdon Local Plan: Part 1 (2012), Policy DME1 7 of the Hillingdon Local Plan Part 2 (2020), Policy G6 of The London Plan (2021), and the National Planning Policy Framework (2024).

Informatives

1. 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).

2. 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.

3. I72 Section 106 Agreement

Section 106 Agreement Informative

You are advised that this permission has been granted subject to a legal agreement under Section 106 of the Town and Country Planning Act 1990.

4. I73 Community Infrastructure Levy (CIL) (Granting Consent)

Community Infrastructure Levy (CIL) (Granting Consent) Informative

Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy Regulations 2010 (as amended), this development is liable to pay the London Borough of Hillingdon Community Infrastructure Levy (CIL) and the Mayor of London's Community Infrastructure Levy (CIL). This will be calculated in accordance with the London Borough of Hillingdon CIL Charging Schedule 2014 and the Mayor of London's CIL Charging Schedule 2012. Before commencement of works the development parties must notify the London Borough of Hillingdon of the commencement date for the construction works (by submitting a Commencement Notice) and assume liability to pay CIL (by submitting an Assumption of Liability Notice) to the Council at planning@hillingdon.gov.uk. The Council will then issue a Demand Notice setting out the date and the amount of CIL that is payable. Failure to submit a valid Assumption of Liability Notice and Commencement Notice prior to commencement of the development may result in surcharges being imposed.

The above forms can be found on the planning portal at:
www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil

Pre-Commencement Conditions: These conditions are important from a CIL liability perspective as a scheme will not become CIL liable until all of the pre-commencement conditions have been discharged/complied with.

5.

Equality Act 2010 Informative

The Equality Act 2010 seeks to protect people accessing goods, facilities and services from discrimination on the basis of a 'protected characteristic', which includes those with a disability. As part of the Act, service providers are obliged to improve access to and within the structure of their building, particularly in situations where reasonable adjustment can be incorporated with relative ease. The Act states that service providers should think ahead to take steps to address barriers that impede disabled people.

6. 115 Control of Environmental Nuisance from Construction Work

Control of Environmental Nuisance from Construction Work Informative

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.

7.

Bickertons Aerodromes Limited Informative

Bickertons Aerodromes Limited advise that users of the development should be notified of the likely presence of aircraft over the lake.

8.

Affinity Water Informative

The construction works and operation of the proposed development site should be done in accordance with the relevant British Standards and Best Management Practices, thereby significantly reducing the groundwater pollution risk. For further information we refer you to CIRIA Publication C532 "Control of water pollution from construction - guidance for consultants and contractors".

Water efficiency:

Being within a water stressed area, we expect that the development includes water efficient fixtures and fittings. Measures such as rainwater harvesting and grey water recycling help the environment by reducing pressure for abstractions in Chalk stream catchments. They also minimise potable water use by reducing the amount of potable water used for washing, cleaning and watering gardens. This in turn reduces the carbon emissions associated with treating this water to a standard suitable for drinking and will help in our efforts to get emissions down in the borough.

Infrastructure connections and diversions:

There are potentially water mains running through or near to part of proposed development site. If the development goes ahead as proposed, the developer will need to get in contact with our Developer Services Team to discuss asset protection or diversionary measures. This can be done through the My Developments Portal (<https://affinitywater.custhelp.com/>) or aw_developerservices@custhelp.com.

In this location, Affinity Water will supply drinking water to the development. To apply for a new or upgraded connection, please contact our Developer Services Team by going through their My Developments Portal (<https://affinitywater.custhelp.com/>) or aw_developerservices@custhelp.com. The Team also handle C3 and C4 requests to cost potential water mains diversions. If a water mains plan is required, this can also be obtained by emailing maps@affinitywater.co.uk. Please note that charges may apply.

9.

HS2 Informative

The developer is advised that the application site is in vicinity of land required to construct and/or operate Phase One of a high-speed rail line between London and the West Midlands, known as High Speed Two. Powers to construct and operate High Speed Two were secured on 23 February 2017 when Royal Assent was granted for Phase One of HS2. Accordingly,

the applicant is advised to follow ongoing progress of the HS2 project at: HS2 Phase One - GOV.UK.

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.

DMAV 1	Safe Operation of Airports
DMCI 1	Retention of Existing Community Sport and Education Facilities
DMCI 1A	Development of New Education Floorspace
DMCI 2	New Community Infrastructure
DMCI 6	Indoor Sports and Leisure Facilities
DMCI 7	Planning Obligations and Community Infrastructure Levy
DMEI 1	Living Walls and Roofs and Onsite Vegetation
DMEI 10	Water Management, Efficiency and Quality
DMEI 11	Protection of Ground Water Resources
DMEI 12	Development of Land Affected by Contamination
DMEI 13	Importation of Material
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 7	Biodiversity Protection and Enhancement
DMEI 8	Waterside Development
DMEI 9	Management of Flood Risk
DMHB 1	Heritage Assets
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMHB 4	Conservation Areas
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMIN 1	Preferred Areas of Mineral Extraction and Aggregates Railheads
DMIN 1A	Assessing Proposals for New Minerals Development
DMIN 2	Prior Extraction
DMIN 3	Extraction, Landfilling and Restoration

DMIN 4	Re-use and Recycling of Aggregates
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LPP D1	(2021) London's form, character and capacity for growth
LPP D12	(2021) Fire safety
LPP D14	(2021) Noise
LPP D4	(2021) Delivering good design
LPP D5	(2021) Inclusive design
LPP DF1	(2021) Delivery of the Plan and Planning Obligations
LPP G1	(2021) Green infrastructure
LPP G2	(2021) London's Green Belt
LPP G5	(2021) Urban greening
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP GG1	(2021) Building strong and inclusive communities
LPP GG2	(2021) Making the best use of land
LPP GG3	(2021) Creating a healthy city
LPP S1	(2021) Developing London's social infrastructure
LPP S3	(2021) Education and childcare facilities
LPP S5	(2021) Sports and recreation facilities
LPP SI1	(2021) Improving air quality
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI15	(2021) Water transport
LPP SI17	(2021) Protecting and enhancing London's waterways
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP SI3	(2021) Energy infrastructure
LPP SI4	(2021) Managing heat risk
LPP SI5	(2021) Water infrastructure
LPP SI6	(2021) Digital connectivity infrastructure
LPP SI7	(2021) Reducing waste and supporting the circular economy
LPP SI8	(2021) Waste capacity and net waste self-sufficiency
LPP T1	(2021) Strategic approach to transport
LPP T2	(2021) Healthy Streets

LPP T3	(2021) Transport capacity, connectivity and safeguarding
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.5	(2021) Non-residential disabled persons parking
LPP T7	(2021) Deliveries, servicing and construction
NPPF11 -24	NPPF11 2024 - Making effective use of land
NPPF12 -24	NPPF12 2024 - Achieving well-designed places
NPPF13 -24	NPPF13 2024 - Protecting Green Belt land
NPPF14 -24	NPPF14 2024 - Meeting the challenge of climate change, flood and coastal change
NPPF15 -24	NPPF15 2024 - Conserving and enhancing the natural environment
NPPF16 -24	NPPF16 2024 - Conserving and enhancing the historic environment
NPPF2 -24	NPPF2 2024 - Achieving sustainable development
NPPF4 -24	NPPF4 2024 - Decision making
NPPF8 -24	NPPF8 2024 - Promoting healthy and safe communities
NPPF9 -24	NPPF9 2024 - Promoting sustainable transport

Appendix 2: Relevant Planning History

2382/AA/86/1767	Broadwater Lake Moorhall Road Harefield Retention of permission 2382/831132 (P) (two nightwatchmens caravans)
Decision: 05-02-1987	Approve Limited Time
2382/AB/86/2096	Broadwater Lake Moorhall Road Harefield Details of race start arrangements in compliance with cond. 6 of p/p ref: 2382Y/86/739 date 4.11.86
Decision: 14-01-1987	Approved
2382/AC/89/0178	Broadwater Lake Moorhall Road Harefield Retention of toilet block
Decision: 30-03-1989	No Further Action(P)
2382/AG/90/0481	Broadwater Lake Moorhall Road Harefield Retention of two watchmans caravans
Decision: 22-03-1991	Approve Limited Time
2382/AH/90/1309	Broadwater Lake Moorhall Road Harefield Creation of a temporary caravan park
Decision: 04-02-1993	Withdrawn
2382/AK/92/0872	Broadwater Lake Moorhall Road Harefield Continued use of northern part of lake for sailing (Renewal of planning permission 2382Y/86/739 dated 4/11/86)
Decision: 04-06-1993	Approve Limited Time
2382/AL/92/0464	Broadwater Lake Moorhall Road Harefield Excavation of minerals by surface working (Application for registration of Interim Development Order Permission under Section 22 of the Planning and Compensation Act 1991)

Decision: 12-06-1992 Approved

2382/AM/98/2306 Broadwater Sailing Club, Broadwater Lake Moorhall Road Harefield
Erection of single storey extension to clubhouse

Decision: 18-08-1999 Approved

2382/AN/99/0609 Broadwater Lake Moorhall Road Harefield

Renewal on a permanent basis of planning permission ref.2382AK/92/872 dated 04/06/93 for the permanent use of the northern part of the lake for sailing

Decision: 22-10-2003 No Further
Action(P)

2382/APP/2000/2225 Land At Broadwater Farm Moorhall Road Harefield

TEMPORARY PARKING FOR UP TO 25 STATIC CARAVANS (FOR A PERIOD UP TO 31/12/02)

Decision: 26-01-2001 Refused

2382/APP/2006/1581 Broadwater Lake Moorhall Road Harefield

MODIFICATION OF FOUR ISLANDS WITHIN THE LAKE TO CREATE NEW WETLANDS FOR WILDLIFE PROJECT.

Decision: 20-07-2006 Withdrawn

2382/APP/2023/525 Hillingdon Water Sports Facility And Activity Centre Broadwater
Lake Moorhall Road Harefield, Uxbridge

Request for Scoping Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for the construction of buildings to provide an outdoor activity centre and a waterbased sailing and rowing area to create the Hillingdon Watersports and Activity Centre including access, car parking, landscaping and associated works.

Decision: 22-05-2023 No Further
Action(P)

2382/N/78/0390 Broadwater Lake Moorhall Road Harefield

Retention of 2 caravans.

Decision: 17-05-1978 Approve Limited
Time

2382/Q/78/2181 Broadwater Lake Moorhall Road Harefield

Installation of portable toilet and cesspool.

Decision: 17-05-1979 Approve Limited
Time

2382/R/79/0261 Broadwater Lake Moorhall Road Harefield

Retention of toilet block.

Decision: 17-05-1979 Approve Limited
Time

2382/S/79/2261 Broadwater Lake Moorhall Road Harefield

Continued use of northern part of lake for sailing and retention of clubhouses, toilets and cesspool.

Decision: 25-03-1980 Approve Limited
Time

2382/T/82/0098 Broadwater Lake Moorhall Road Harefield

Retention of Northern part of lake for sailing and retention of clubhouse.

Decision: 01-06-1982 Approve Limited
Time

2382/W/83/1132 Broadwater Lake Moorhall Road Harefield

Retention of two watchmen caravans.

Decision: 28-09-1983 Approve Limited
Time

2382/X/85/1648 Broadwater Lake Moorhall Road Harefield

Re-location of clubhouse to northern part of the lake.

Decision: 11-04-1986 Refused

2382/Y/86/0739 Broadwater Lake Moorhall Road Harefield

Retention of permission 02382/820098(P)

Decision: 04-11-1986 Approve Limited
Time

2382/Z/86/1291 Broadwater Lake Moorhall Road Harefield

Retention of sailing club involving erection of club hut, boathouse with assoc parking and access.

Decision: 04-11-1986 **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.CI1	(2012) Community Infrastructure Provision
PT1.CI2	(2012) Leisure and Recreation
PT1.EM1	(2012) Climate Change Adaptation and Mitigation
PT1.EM11	(2012) Sustainable Waste Management
PT1.EM2	(2012) Green Belt, Metropolitan Open Land and Green Chains
PT1.EM3	(2012) Blue Ribbon Network
PT1.EM5	(2012) Sport and Leisure
PT1.EM6	(2012) Flood Risk Management
PT1.EM7	(2012) Biodiversity and Geological Conservation
PT1.EM8	(2012) Land, Water, Air and Noise
PT1.HE1	(2012) Heritage

Part 2 Policies:

DMAV 1	Safe Operation of Airports
DMCI 1	Retention of Existing Community Sport and Education Facilities
DMCI 1A	Development of New Education Floorspace
DMCI 2	New Community Infrastructure
DMCI 6	Indoor Sports and Leisure Facilities
DMCI 7	Planning Obligations and Community Infrastructure Levy
DMEI 1	Living Walls and Roofs and Onsite Vegetation

DMEI 10	Water Management, Efficiency and Quality
DMEI 11	Protection of Ground Water Resources
DMEI 12	Development of Land Affected by Contamination
DMEI 13	Importation of Material
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 7	Biodiversity Protection and Enhancement
DMEI 8	Waterside Development
DMEI 9	Management of Flood Risk
DMHB 1	Heritage Assets
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMHB 4	Conservation Areas
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
DMIN 1	Preferred Areas of Mineral Extraction and Aggregates Railheads
DMIN 1A	Assessing Proposals for New Minerals Development
DMIN 2	Prior Extraction
DMIN 3	Extraction, Landfilling and Restoration

DMIN 4	Re-use and Recycling of Aggregates
LPP D1	(2021) London's form, character and capacity for growth
LPP D12	(2021) Fire safety
LPP D14	(2021) Noise
LPP D4	(2021) Delivering good design
LPP D5	(2021) Inclusive design
LPP DF1	(2021) Delivery of the Plan and Planning Obligations
LPP G1	(2021) Green infrastructure
LPP G2	(2021) London's Green Belt
LPP G5	(2021) Urban greening
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP GG1	(2021) Building strong and inclusive communities
LPP GG2	(2021) Making the best use of land
LPP GG3	(2021) Creating a healthy city
LPP S1	(2021) Developing London's social infrastructure
LPP S3	(2021) Education and childcare facilities
LPP S5	(2021) Sports and recreation facilities
LPP SI1	(2021) Improving air quality
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI15	(2021) Water transport
LPP SI17	(2021) Protecting and enhancing London's waterways
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP SI3	(2021) Energy infrastructure

LPP SI4	(2021) Managing heat risk
LPP SI5	(2021) Water infrastructure
LPP SI6	(2021) Digital connectivity infrastructure
LPP SI7	(2021) Reducing waste and supporting the circular economy
LPP SI8	(2021) Waste capacity and net waste self-sufficiency
LPP T1	(2021) Strategic approach to transport
LPP T2	(2021) Healthy Streets
LPP T3	(2021) Transport capacity, connectivity and safeguarding
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.5	(2021) Non-residential disabled persons parking
LPP T7	(2021) Deliveries, servicing and construction
NPPF11 -24	NPPF11 2024 - Making effective use of land
NPPF12 -24	NPPF12 2024 - Achieving well-designed places
NPPF13 -24	NPPF13 2024 - Protecting Green Belt land
NPPF14 -24	NPPF14 2024 - Meeting the challenge of climate change, flood and coastal change
NPPF15 -24	NPPF15 2024 - Conserving and enhancing the natural environment
NPPF16 -24	NPPF16 2024 - Conserving and enhancing the historic environment
NPPF2 -24	NPPF2 2024 - Achieving sustainable development
NPPF4 -24	NPPF4 2024 - Decision making
NPPF8 -24	NPPF8 2024 - Promoting healthy and safe communities
NPPF9 -24	NPPF9 2024 - Promoting sustainable transport