



Applicant Response to TfL (Stage 1)

Planning Application Reference 2382/APP/2023/2906
Broadwater Lake, Moorhall Road, Harefield, UB9 6PE

Stage 1 Comment: (11 th Dec 2023)	Revised scheme comment: (11 th March 2026)	Applicant Comments
Access		
Access to the site is via a private access road off Moorhall Road. There are currently no footways or street lighting present on the access road. Improvements to this site access road and junction, which includes the provision of a dedicated pedestrian footway, new street lighting and introduction of a 20mph speed limit are proposed. These improvements have been subject to a Stage 1 Road Safety Audit, the findings of which should be considered with the relevant highway authority.	As the highway authority the RSA should be agreed by LB Hillingdon. Access improvements have been highlighted including new street lighting. Confirmation of where this is to be located and how this is to be secured is required.	An External Lighting Scheme (dwg. 2001 P1 and 2002 P1) has been submitted which shows the lighting strategy for the access road and the remainder of the Site. Condition No. 37 as currently drafted requires an External Lighting Scheme to be submitted to the Council for approval prior to the first operation of the development. The External Lighting Scheme will include location, height, type and direction of light sources and intensity of illumination for the entire Site, including the access road.
It should be ensured that the proposed access is designed in line with the Mayor's	<i>'Introduction of a 1.2m-1.5m wide footway along the eastern side of the road up to the</i>	No action required.



Note continued

<p>Healthy Streets approach, with priority given to modes of sustainable and active travel over that of private vehicle. On the General Arrangement Plans there are several stretches of access road where the footpath changes sides without any crossing or demarcation. This should be addressed</p>	<p><i>intended point of adoption. A 1.2m marked footway will be continued along the eastern side of the access road.’ AND ‘A marked crossing point proposed at the northern end of the access road will connect the proposed footway to the pedestrian entrance to the site.’ – This has been addressed.</i></p>	
Healthy Streets		
<p>In line with policy T1 the development should promote travel by sustainable modes and active travel. A daytime Active Travel Zone (ATZ) assessment has been undertaken in accordance with TfL guidance in line with the Healthy Streets approach providing a detailed review of the ATZ surrounding the site. However, it should be extended to include how the site connects to the Grand Union canal and other public footpaths that are within proximity to this site.</p>	<p>This has not been addressed. TfL reiterate that routes should be extended to include how the site connects to the Grand Union Canal and other public footpaths. This is important to ensure the application meets the mode share targets to comply with London Plan policy T1.</p>	<p>The connectivity of the Site to the Grand Union Canal has been carefully considered by the Applicant team in order to meet the statutory safeguarding requirements of future users, such as school students and younger or more vulnerable people. The proposed development must meet stringent safeguarding and security standards to the level of educational institutions. The statutory requirements for security include the Department of Education Statutory Guidance on Keeping Children Safe in Education for children under the age of 18.</p>



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		<p>The Applicant has agreed to provide a financial contribution to LB Hillingdon for improvement works associated with the Moorhall Road to Black Jacks Lock project. This project will support active recreational access to the lakes along the canal from Uxbridge, Denham and South Harefield. The project stretches a total of 1.8km and a financial contribution will be secured through a S106 Agreement. The works will assist in improving the pedestrian and cycle connection from the Site to the Grand Union Canal, encouraging future users to use sustainable means of travel.</p>
<p>It is also noted that night-time use of the lake and overnight accommodation is indicated. The routes which would be used at night should be included in a night-time ATZ Assessment. TfL would support Hillingdon Council in securing a contribution towards improving the active travel environment.</p>	<p>This has not been addressed. In line with TfL advice note (published here: https://content.tfl.gov.uk/night-time-atz-advice-revbapr2025.pdf) a night-time active travel zone assessment should be completed prior to determination.</p>	<p>Land and water-based activities will take place Monday to Friday between 10:00 and 15:00, with staff on site from 08:30 to 17:30. Camping will occur overnight on Friday and Saturday.</p> <p>A comprehensive trip generation assessment has been carried out which shows that throughout the year, all user</p>



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		<p>vehicle trips (including those relating to camping) will take place between the hours of 0830 and 1800.</p> <p>Staff and delivery / servicing vehicles will arrive and depart the site on an adhoc basis throughout the day. Given that the staff hours are 08:30 to 17:30, it is unlikely that any vehicle movements relating to staff or delivery / servicing vehicles will take place during the hours of 18:00 to 06:00, as this is outside the defined staff working hours.</p> <p>As the Site will operate outside of TfL's defined 'night-time' hours, there is no requirement to provide a night-time ATZ assessment.</p>
<p>Further information is required regarding how the access road and footpath would comply with the Mayor's Vision Zero approach. As stated above, on the General Arrangement Plans there are several stretches of access road where the footpath</p>	<p>Clarity on the lighting strategy for the access road and the site itself is required to ensure safety and perceptions of safety with concerns around the car park. Further clarity on wayfinding is still required.</p>	<p>An External Lighting Scheme (dwg. 2001 P1 and 2002 P1) has been submitted which shows the lighting strategy for the access road and the remainder of the Site.</p>



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<p>changes sides without any crossing or demarcation. Given the curved nature of the access road this could result in poorly sighted crossing by pedestrians which could endanger the safety of pedestrians and motorists. Additionally, the footpath terminates into the car park at the end where vehicles would potentially conflict with pedestrians. Additionally, the proposed footpath and pedestrian crossings need to be shown more clearly on the swept path analysis. Further information on signage and wayfinding, within the site and on adjoining streets and the canal are required to be delivered.</p>		<p>Condition No. 37 as currently drafted requires an External Lighting Scheme to be submitted to the Council for approval prior to the first operation of the development. The External Lighting Scheme shall include final details of location, height, type and direction of light sources and intensity of illumination for the entire Site, including the access road.</p> <p>The wayfinding strategy will be provided at detailed design stage. Condition No. 45 as currently drafted requires a wayfinding strategy to be submitted to the Local Planning Authority for approval, prior to the first operation of the proposed development.</p>
<p>Car Parking</p>		
<p>A total of 83 vehicle parking spaces are proposed across the site. As noted in Policy T6.4, parking for leisure uses should be assessed on a 'case-by case basis, ensuring that it is consistent with the Healthy Streets Approach, mode share and active</p>	<p><i>'A total of 42 vehicular parking spaces are provided', plus drop off facilities. This represents a reduction of 41 spaces from the previous scheme, which TfL welcomes. However, further information on how the car parking figure has been arrived at is</i></p>	<p>There are no car parking standards for this type of development within the London Plan (2021) or LB Hillingdon's Local Plan Part 2 (2020). Paragraph 10.6.5 of the London Plan states that, where no standards exist, parking</p>



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<p>travel targets, and the aim to improve public transport reliability and reduce congestion and traffic levels.’ No clarity has been provided on how the figure of 83 was arrived at. Furthermore, when noting the information on number of peak users over a day, there is a concern that 83 parking spaces is a significant overprovision.</p>	<p>required in order to ensure the proposals meet all relevant London Plan policy and robustly demonstrates case by case parking policy. TfL also query the ability for informal parking on the access roads. Appropriate design and management measures should be implemented to ensure there is no overspill parking.</p>	<p>provision should be determined on a case-by-case basis. Appendix C of the Local Plan Part 2 further confirms that for a development of this type, parking should be established through an individual assessment informed by the Transport Assessment and supported by a Travel Plan.</p> <p>An assessment of car parking provision has been carried out, the results of which are set out in the Transport Assessment. The proposed provision of 42 spaces is based on the expected number of visitors to the site, balanced against the objective of promoting sustainable and active travel measures, such as car-sharing.</p> <p>The proposed parking largely formalises the existing provision associated with Broadwater Sailing Club, with additional capacity to support the new facility. The maximum number of visitors anticipated on site at any one time is 120 typically</p>
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		<p>during Broadwater Sailing Club open and regatta events. Travel by Sailing Club members is expected to be primarily via car sharing, reflecting the family-orientated nature of these events.</p> <p>Informal car parking will be restricted. Measures to manage and prevent informal parking will be set out within an Operational Management Plan, to be submitted to the Local Planning Authority for approval prior to the first operation of the development.</p>
<p>Whilst the isolated nature of the proposed development is noted, in line with the Mayor's strategic mode shift target, it is considered that additional measures could be implemented to support instilling sustainable and active travel to this site. Noting the aforementioned, a reduction in the quantum of car parking is sought</p>	<p>As above.</p>	<p>TfL have welcomed the reduction in quantum of car parking to 41 spaces. A series of sustainable and active travel measures for both staff and visitors are set out in the Travel Plan. These include:</p> <ul style="list-style-type: none">▪ Promoting walking and cycling as a healthy-cost effective means of travel;



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		<ul style="list-style-type: none">▪ Producing a strategy for group transport arrangements prior to the operation of the development;▪ Providing details of public transport options to users;▪ Actively encouraging car sharing, carpooling and coordination of vehicle trips with other user groups;▪ A final Travel Plan will be submitted to the Local Planning Authority for approval prior to the first occupation of the development. This is to ensure that the final Travel Plan is tailored to the final, occupied site.
<p>The disabled persons car parking spaces should accord with the requirements of London Plan policy T6.5 in number and design. Further information on the infrastructure to facilitate safe, equal for all and comfortable drop-off's and pick-ups at the coach bays is required. Sited alongside the access road, appropriate shelters,</p>	<p><i>A total of six blue badge parking bays are proposed. A total of six active EVCP are provided within the southern parking area of the site.</i> These should be secured appropriately.</p>	<p>Condition No. 36 as currently drafted requires the layout of the six accessible parking spaces to be submitted to the Local Planning Authority prior to the commencement of development. Once the condition has been discharged, there is a requirement for the Applicant to comply with the approved details.</p>



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<p>pedestrian routes and waiting areas need to be indicated.</p> <p>All operational parking must provide facilities for electric charging vehicles. A Parking Development Management Plan should be secured by an appropriate mechanism to control how parking, drop-off and collection will be safeguarded for the respective users.</p>		
Cycle Parking		
<p>High quality cycle parking facilities to support a modal shift towards the use of cycles are required. 18 long-stay and 24 short-stay cycle parking spaces are currently proposed, derived through using the cycle parking standards associated with C3-C4 dwellings. Officers do not agree with this approach, noting that cycle parking provision should also be linked to the range and size of sports and educational facilities which will be provided. The provision of cycle parking facilities to comply with policy T5 and in accordance with the London Cycle Design Standards should be provided at this stage and not under conditions</p>	<p>A total of 42 long stay and short stay cycle parking spaces are provided for HWSFAC. Cycle parking is located within the southern car parking area within a secure and sheltered store.</p> <p>TfL query the safety and perceived level of safety of the cycle parking location given it is located away from the main areas of use with limited natural surveillance. As stated below in the Delivery and Servicing section, by moving the cycle parking closer to the main buildings a space for a delivery vehicle could be provided.</p>	<p>The cycle parking has been located at the northern extent of the car parking area to provide a separation between the activity area and the parking area. The separation is for the benefit and safety of the proposed users.</p> <p>An assessment of the alternative siting options for the cycle store, demonstrating a 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, will be submitted to the Local Planning Authority for</p>



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		<p>approval prior to the first operation of the development.</p> <p>The final agreed location will ensure improved passive surveillance, user safety and convenience. A feasibility study of a dedicated delivery and servicing bay in the space will also be carried out and could be made available by relocating the cycle store. This will also be submitted to the Local Planning Authority for approval prior to the first operation of the development. The feasibility study will include swept-path analysis and measures to avoid conflict with pedestrians, coaches, minibuses and other operational movements.</p>
Public Transport		
<p>The Transport Assessment should include an up-to-date multi-modal trip generation with public transport disaggregated by mode. Trip generation and demand may justify contributions to mitigate the impact of, or otherwise support, the development</p>	<p>A trip generation assessment has been conducted. This suggests that all users would travel by either car or minibus/coach to the site, with some staff using active travel modes but over 55% using car. TfL note that the modal split is not in line with</p>	<p>Details of a shuttle service between the Site and the nearest railway station have not been considered at this stage. A final Travel Plan will be submitted to the Local Planning Authority for approval prior to the first occupation of the development.</p>



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<p>through improvements to walking, cycling, public transport or other transport networks in the area. To support achieving a strategic modal shift, consideration should be given to the implementation of a shuttle service between this site and the nearest rail station to enable users to access this facility via modes of sustainable travel.</p>	<p>the Mayor's mode shift target and that appropriate design and management measures should be implemented to support a strategic modal shift. It is not clear whether any consideration has been given to a shuttle service between the site and the nearest rail station to enable users to access this facility via sustainable modes.</p> <p>No strategic public transport contributions are required from this site.</p>	<p>This is to ensure that the final Travel Plan is tailored to the final, occupied site. This will consider and assess active travel measures and car use reduction targets.</p>
<p>Deliveries & Servicing:</p>		
<p>It is understood that delivery and servicing is to take place on site, which is in line with Policy T7. An outline Delivery and Servicing Plan (DSP) has been provided to support this application. It should be updated to include details on the measures that will be implemented to support sustainable and active freight to this site, in line with Policy T7. The outline Delivery and Servicing Plan identifies a range of locations in which this activity will take place. However, deliveries and servicing should take place from</p>	<p>'deliveries will be able to take place in the minibus drop-off and collection bay. If this bay is in use, or delivery and servicing vehicles are required to stay on-site for an extended period of time, they will be able to park within the parking bays or the coach drop-off and collection bay to the south of the site'. This has not been addressed and still requires the use of the drop off bays and or standard parking bays</p>	<p>A comprehensive trip generation assessment has been carried out as detailed in the Transport Assessment which confirms that, during the peak months (April to September), up to two delivery and servicing vehicles will visit the site per day. During the off-peak months (October to March), this will reduce to one vehicle per day. Given the low frequency of these trips, a dedicated delivery and servicing bay is not required.</p>



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<p>designated loading bays and not 'from the coach drop-off and collection bay or parking bays'. Swept path analysis should be provided to demonstrate that delivery and servicing vehicles can enter and exit these locations in forward gear, in line with Policy T7. A full Delivery and Servicing Plan should be secured through condition.</p>	<p>in order to fulfil deliveries. As stated above, moving the cycle parking further into the site could open up space for a delivery and servicing bay.</p>	<p>Most delivery and servicing activities will be scheduled outside peak drop-off and pick-up periods, allowing the minibus drop-off and collection bay to be used when required.</p> <p>As stated above, the cycle parking has been located at the northern extent of the car parking area to provide a separation between the activity area and the parking area. The separation is for the benefit and safety of the proposed users.</p> <p>An assessment of the alternative siting options for the cycle store, demonstrating a 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, will be submitted to the Local Planning Authority for approval prior to the first operation of the development.</p>
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		<p>The final agreed location will ensure improved passive surveillance, user safety and convenience. A feasibility study of a dedicated delivery and servicing bay in the space will also be carried out and could be made available by relocating the cycle store. This will also be submitted to the Local Planning Authority for approval prior to the first operation of the development. The feasibility study will include swept-path analysis and measures to avoid conflict with pedestrians, coaches, minibuses and other operational movements.</p>
Construction		
<p>An outline Construction Logistics Plan (CLP) has been provided to support this application. A full CLP should be secured through the appropriate mechanism, in line with Policy T7. The Construction Logistics Plan (CLP) should be produced in accordance with TfL best practice guidance. It is not clear from the outline Construction Logistics Plan whether any parts of the site</p>	<p>A detailed CLP has been submitted, which is welcome. No strategic transport comments.</p>	<p>No action required.</p>



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<p>will remain open and in use during the demolition and construction phases. This needs to be confirmed (and programmed accordingly) to ensure no risk to safety for any users from demolition/construction vehicles/activities.</p>		
Travel Plan		
<p>A comprehensive Travel Plan should be produced in accordance with TfL guidance for travel planning. The targets within the Travel Plan should align with the Mayor’s strategic mode shift target detailed in Policy T1. This should be secured, funded, and enforced through the section 106 agreement.</p>	<p>A travel plan has been submitted for review. The aim of the travel plan is to reduce number of vehicle trips and promote active travel. However, there is no way of assessing the objective without a SMART aim target being included. There is no clear strategy for encouraging active travel or public transport use by staff or visitors. The TP does not contain any measurable car use reduction targets such as reductions in single occupancy car use, or parking demand strategies.</p>	<p>Given the nature and location of the development, the majority of users will travel by either car or minibus with some users cycling and walking from nearby public transport. A financial contribution will be provided to support healthy streets initiatives and active travel zones.</p> <p>A final Travel Plan will be submitted to the Local Planning Authority for approval prior to the first occupation of the development. This is to ensure that the final Travel Plan is tailored to the final, occupied site. This will consider and assess active travel measures and car use reduction targets</p>