

Our ref: AF/CW/Q220454
Your ref: 2382/APP/2023/2906
Email: angie.fenton@quod.com
Date: 3rd February 2026



Planning Department
Hillingdon Council
Civic Centre
High Street
Uxbridge
UB8 1UW

For the Attention of Michael Brigginsshaw

Dear Michael

Planning application reference 2382/APP/2023/2906
Broadwater Lake, Moorhall Road, Harefield, UB9 6PE
Applicant response to comments made by Canal and Rivers Trust

We write on behalf of the London Borough of Hillingdon (LBH) ('the Applicant'), in response to the comments received from HS2 issued to the Applicant on 13th January 2026 in relation to planning application ref. 2382/APP/2023/2906 for the proposed Hillingdon Water Sports Facility and Activities Centre (HWSFAC) at Broadwater Lake, Moorhall Road, Harefield, UB9 6PE ('the Site').

We note that HS2 has confirmed that they have **no objection in principle** to the proposed development, subject to appropriate clarification and safeguards. The points raised to be matters of coordination and clarification rather than issues of principle, and we are keen to address these constructively.

1 HS2 mitigation features and mapping

The floating gravel islands are HS2 mitigation measures approved under Schedule 17 of the High-Speed Rail (London – West Midlands) Act 2017 and do not form part of the Proposed Development. They are not relied upon to deliver mitigation or enhancement for this scheme. For the avoidance of doubt, we do not consider it necessary to update the submitted plans in this regard, as these features were installed after the submission of the planning application and are outside the scope of the planning application. Their position also does not affect the determination of the planning application.

2 No double counting of mitigation

For the avoidance of doubt, HS2 mitigation measures are **not included** within the Biodiversity Net Gain calculations or ecological mitigation proposals for this application, and no credit is taken for these features. There has been no double counting of mitigation.



3 Cumulative impacts with HS2

HS2 advised that HS2 works may continue beyond viaduct construction and that some overlap with the programme for the proposed development is possible. HS2 is treated as a committed development within the Environmental Statement, and cumulative effects have been assessed on that basis. The assessment has applied reasonable worst-case assumptions in terms of construction overlap and intensity of activity. We are satisfied that, even on this precautionary basis, the conclusions of the Environmental Statement remain robust and unchanged.

4 Environmental Management Steering Group

We note HS2's comment regarding participation in the Environmental Management Steering Group and confirm that HS2 will be invited to engage through this forum as the project progresses.

5 Bat survey data

We acknowledge HS2's comment regarding more recent bat survey work undertaken in 2023 and 2024. We are happy to engage with HS2 to understand this information on a confirmatory basis. Based on the existing evidence base and the precautionary assumptions already applied, we do not anticipate that this would alter the conclusions of the Environmental Statement. Accordingly, we do not consider it necessary to supplement the application with further information for the purposes of determining the planning application.

6 Conditions and safeguards

We note their comments in respect of the Construction Environmental Management Plan and the Construction Logistics Plan. We confirm that such conditions are acceptable in principle, with the exact wording to be agreed with the Local Planning Authority.

In summary, HS2 raises no objection in principle, and the matters identified are capable of being addressed through clarification, coordination and planning conditions.

Please let me know if any further clarification would be helpful.

Yours sincerely,

Angie Fenton
Director