

Our ref: AF/CW/Q220454
Your ref: 2382/APP/2023/2906
Email: angie.fenton@quod.com
Date: 4th 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 the Herts & Middlesex Wildlife Trust

We write on behalf of the London Borough of Hillingdon (LBH) ('the Applicant'), in response to the comments received by the Herts & Middlesex Wildlife Trust (H&MWT), 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 Activity Centre (HWSFAC) at Broadwater Lake, Moorhall Road, Harefield, UB9 6PE ('the Site'). We also note that Buglife has raised broadly similar concerns in its representations.

The H&MWT's comments disagree with the professional conclusions of the Environmental Statement, particularly with regard to disturbance effects on waterbirds and potential impacts on the SSSI and the Metropolitan Site of Importance for Nature Conservation. An organisation known as Buglife submitted a letter dated 15th January 2026 within which they raised similar concerns to H&MWT. The Local Planning Authority must note that:

- The various ecological assessments have been undertaken by appropriately qualified and experienced ecologists in accordance with current guidance and best practice;
- The methodology, assumptions and conclusions have been subject to independent third-party review by Arup on behalf of the LBH; and
- The statutory nature conservation body, Natural England, has confirmed it is satisfied with the assessment approach and conclusions, including in respect of potential effects on the SSSI.

In this context, whilst we recognise that H&MWT hold a different opinion, the Applicant and its team of expert consultants remain confident that the Environmental Statement presents a robust, proportionate and evidence-based assessment of likely effects. The assessment has been undertaken

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on a risk-based and proportionate basis, consistent with the EIA Regulations and established case law.

The conclusions have been reached following extensive baseline survey work, application of reasonable worst-case assumptions, and careful consideration of mitigation and management measures. The scheme is also supported by a monitoring and management framework, allowing for adaptive management, should any unforeseen effects arise.

With regard to the comments made by H&MWT on alternative sites, policy compliance and the Council's statutory biodiversity duty, we respectfully disagree with their conclusions. A comprehensive Alternative Sites Assessment was undertaken which demonstrates that reasonable alternatives have been properly considered in line with policy requirements. National and local policy do not impose an absolute prohibition on development within SSSIs, but instead require a robust assessment of effects and appropriate mitigation, which has been provided through the Environmental Statement and accompanying management measures. On this basis, and noting Natural England's satisfaction with the Environmental Statement, we do not agree that granting planning permission would place the Council in breach of its statutory duty to conserve and enhance biodiversity.

The conclusions reflect a structured, evidence-led assessment that has been independently reviewed and accepted by the statutory consultee. Ultimately, it is for the Local Planning Authority to weigh the evidence before it, having particular regard to the advice of statutory consultees.

In light of the above, we do not propose to enter into a detailed point-by-point rebuttal of all matters raised. Natural England's position is particularly material in this regard and provides a clear regulatory basis for confidence in the assessment.

Should the Council require clarification on any specific matters raised, we would of course respond as appropriate.

Yours sincerely,

Angie Fenton

Director