

**Our ref:** CW/AF/Q220454  
**Your ref:** 2382/APP/2023/2906  
**Email:** angie.fenton@quod.com  
**Date:** 3<sup>rd</sup> 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 Colne Valley Regional Park**

We write on behalf of the London Borough of Hillingdon (LBH) ('the Applicant'), in response to the comments received from the Colne Valley Regional Park (CVRP), issued to the Applicant on 13 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').

Each point raised by CVRP is addressed below.

## **1 Principle of Development**

CVRP have objected to the principle of development at Broadwater Lake on the basis of its location within the Colne Valley Regional Park and the Mid Colne Valley SSSI. This objection is not supported by the planning evidence or statutory consultee position.

The principle of development has been extensively tested through the Environmental Assessment and through prolonged engagement with statutory bodies. The scheme has been fundamentally redesigned to reduce its footprint, relocate built form onto existing hardstanding, expand bird refuge areas and introduce a comprehensive mitigation, monitoring and adaptive management framework.

Natural England, as the statutory body for protecting the natural environment, has now confirmed that it has no objection to the development, subject to appropriate mitigation being secured by condition. As the Government's statutory advisor on nature conservation, Natural England's position is a material consideration of significant weight in determining whether development affecting a SSSI is acceptable in principle.



The Environmental Statement demonstrates that, with mitigation in place, the proposals will not result in adverse effects on the integrity of the SSSI and comply with national policy tests for development affecting designated sites.

The development is also required to deliver a replacement facility of regional importance, following the permanent loss of the former HOAC site due to HS2. The scheme delivers substantial public, sporting and educational benefits which have been given significant weight throughout the planning balance.

In this context, the principle of development at Broadwater Lake has been robustly justified and is supported by the evidence. The objection in principle is therefore misplaced.

## **2 Alternative Sites**

CVRP suggest that the development should be relocated to alternative sites within the Regional Park, including Troy Lake and the former HOAC site.

Alternative locations have been comprehensively and independently assessed through the HWSFAC Alternative Sites Assessment, prepared by London Borough of Hillingdon. This exercise reviewed 71 potential sites within a 20km search area and applied a robust two-stage sequential assessment.

Troy Lake was assessed and discounted at an early stage of the Alternative Sites Assessment. Troy Lake is currently used by Rickmansworth Sailing Club (RSC) who have agreed to allow the Colne Valley Youth & Community Association ('the Association') to operate from Troy Lake on a temporary basis. The temporary operation is to ensure that the two remaining HOAC facility employees can remain employed whilst a suitable alternative location is sought, and the planning application is being determined.

The Association's offer currently consists of kayaking and dinghy sailing in the school holidays only. The Association are not operating during the term-time and are not offering any services to schools, colleges, youth organisations, private adult individuals or community clubs. The Association have advised that there is an average of 20 children visiting the site per day during the school holidays.

The Association cannot offer their full services at Troy Lake, as the land area is significantly smaller to that of the former HOAC facility. The land areas measures at less than two hectares which is not large enough to accommodate both the Association and the RSC's operation.

There are also only two toilets, and one shower room located at Troy Lake, which is not enough for a replacement facility. The storage on site for the Association's equipment is limited to one small shed and there is no land available for camping activities. Troy Lake does not have the facilities to accommodate school, college or other youth organisations and as set out above, these user groups are clearly an integral part of the Association's operation.



In summary, the Association's current operation at Troy Lake is a short-term option to allow their two existing employees to remain employed. The Association cannot operate from this site in the medium to long-term.

The former HOAC site did not meet the Stage 1 assessment criteria and was therefore not shortlisted. This reflects the fundamental change in circumstances following the approval and construction of HS2 infrastructure, including a viaduct crossing the lake. This has introduced unacceptable noise, visual and safety impacts, particularly for school groups and vulnerable users, rendering the site operationally unviable as a replacement facility.

Broadwater Lake is the only viable site that meets operational needs, can be secured for exclusive use, is deliverable within the agreed funding envelope, and maintains accessibility for the established user base.

The evidence is unequivocal: there are no realistic alternative sites capable of delivering this replacement facility. Broadwater Lake is not a matter of preference – it is the only viable option.

Accordingly, the suggestion that the scheme should be relocated elsewhere within the Regional Park is misplaced and unsupported.

### **3 Impact on the Mid Colne Valley SSSI**

CVRP express concern that the development will harm the SSSI. This issue has been subject to extensive assessment in Chapter 7 of the Environmental Statement. The Environmental Statement concludes that, with the secured mitigation, there will be no adverse effect on the integrity of the SSSI. Key mitigation includes:

- Expanded bird refuge areas;
- Increased buffer distances;
- Activity zoning;
- Seasonal restrictions; and
- Long-term monitoring and adaptive management.

These measures are now supported by Natural England, who have confirmed no objection subject to mitigation and conditions.

### **4 Activity Levels & Precedent**

CVRP reference the restrictions placed on the water ski club under planning permission 17/00151/FUL.



Operational intensity and disturbance effects have been comprehensively assessed within Chapter 7 and 10 of the Environmental Statement. The activities proposed as part of the current scheme differ materially in nature, scale and disturbance characteristics from water skiing, which involves high-speed motorised craft, elevated noise levels and sustained surface disturbance.

By contrast, the proposed activities are predominantly non-motorised, lower intensity and spatially controlled. The mitigation strategy incorporates:

- Zoning of activities away from sensitive habitats and bird refuge areas;
- Seasonal restrictions during key breeding, moulting and overwintering periods; and
- A formal monitoring framework with clearly defined trigger points enabling activity modification, reduction or suspension should any adverse effects be detected.

This represents a far more sophisticated and responsive management framework than the historic blanket restrictions applied to water skiing, allowing impacts to be managed dynamically based on real monitoring evidence rather than precautionary prohibition.

## **5 Woodland Loss & Habitat Effects**

Woodland impacts and habitat change are assessed in detail within Chapter 7 of the Environmental Statement. Following consultation and further ecological survey work, the scheme has been substantially redesigned to:

- Minimise tree loss through careful siting of built form and infrastructure;
- Retain and protect high-value habitats, including mature woodland and wetland features; and
- Deliver measurable biodiversity enhancement through habitat creation, improved management and ecological connectivity.

Where limited tree loss is unavoidable, this will be fully compensated on-site through new planting and habitat creation. All mitigation and enhancement measures will be secured through planning conditions and a long-term management plan to ensure lasting ecological benefit.

## **6 Lighting & Bat Impacts**

Potential impacts arising from artificial lighting and effects on bat populations have been comprehensively assessed within Chapter 7 and 10 of the Environmental Statement.

The lighting strategy has been specifically designed to avoid and minimise ecological harm, and incorporates a robust package of mitigation measures, including:



- Low-spill, directional luminaires to prevent light trespass into sensitive habitats and along key bat commuting corridors;
- Strict operational curfews to limit lighting during night-time periods when bat activity is highest; and
- Use of bat-sensitive luminaires with warm colour temperatures and tightly controlled lux levels, in accordance with best practice guidance.

The Environmental Statement demonstrates that these measures will ensure that dark corridors are retained, foraging habitat is protected, and existing commuting routes remain functional.

With this mitigation secured, the assessment concludes that there will be no significant residual effects on bat populations, wider ecology or landscape character.

## **7 Source Protection Zones & Water Quality**

Potential impacts on the water environment, including Source Protection Zones, have been fully assessed within Chapter 8 of the Environmental Statement.

This assessment confirms that the development will pose no unacceptable risk to Source Protection Zones or groundwater resources. In particular:

- All foul drainage will be discharged to the main sewer network for off-site treatment, with no on-site sewage treatment proposed;
- Boat wash facilities will discharge to the foul sewer network, rather than directly to the lake, ensuring there is no risk of biological contamination or pollutant entry to the waterbody;
- A comprehensive package of pollution prevention measures will be secured through a condition-approved Construction Environmental Management Plan (CEMP). This will include controls on fuel and chemical storage, spill response procedures, surface water management and emergency protocols; and
- Ongoing monitoring arrangements will be implemented to ensure that water quality is protected throughout both construction and operation.

The Environment Agency has been formally consulted on these matters as the statutory regulator and based on the submitted evidence, has raised no objection on these matters in principle.

## **8 Grey Belt Classification**

As set out in the submitted Planning Statement, the Site is Previously Developed Land and meets the criteria to be defined as 'Grey Belt', as set out in the National Planning Policy Framework (NPPF) (December 2024).



Notwithstanding the site's location within the Grey Belt, there is also a very strong case that the Proposed Development is "appropriate" development given that it meets the exceptions listed in Paragraph 154(b) of the NPPF (November 2024). The Proposed Development will provide buildings and facilities for outdoor sport and recreation and the openness is preserved, as is demonstrated in the Landscape and Visual Assessment (LVIA). It is therefore appropriate development in the Green Belt.

Even if the proposed development were to be considered as "inappropriate development" in the Green Belt, any harm by reason of inappropriateness, and any other harm resulting from the proposed development are substantially outweighed by other considerations such that 'Very Special Circumstances' (VSC) are demonstrated. A VSC and Development Benefits Statement has been submitted as part of the planning application which demonstrates this.

The balance given to the site's classification as 'Grey Belt' and 'appropriate development' is clearly and transparently set out within the Planning Statement and reflects a robust, policy-led assessment of the proposals.

Accordingly, any suggestion that the application depends upon a 'Grey Belt' classification is incorrect and should be disregarded.

## 9 Section 106 Request

We note your request to be involved in any future Section 106 agreement.

Any planning obligations will be solely a matter for the Local Planning Authority and must meet the statutory tests of necessity, direct relationship to the development, and proportionality as set out in Regulation 122 of the Community Infrastructure Levy Regulations.

Accordingly, any consideration of planning obligations will be determined by the LPA in the event that permission is granted and cannot be pre-empted or negotiated through third-party representations.

## 10 Conclusion

We recognise the importance of the Colne Valley Regional Park and the sensitivity of the location. The scheme has been **fundamentally reshaped** to respond to consultee concerns and is now supported by Natural England, subject to conditions.

The Environmental Statement demonstrates that the development can proceed **without harm to the SSSI**, while delivering significant public, sporting and ecological benefits.



We trust this addresses your concerns. We remain open to continued dialogue should you wish to discuss any of the above.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Angie Fenton".

Angie Fenton  
Director