HWSFAC Hillingdon Water Sports Facility and Activity Centre

1329-HAV-XX-XX-RP-A-S2 - 0019_Planning Statement:

Response to Planning Application Urban Design Officer Comments

Date: 09.02.26

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1.0 Introduction

1.1 Purpose of Planning Statement

1.1.1 This statement has been prepared by Haverstock Architects to accompany a full planning application on behalf of the London Borough of Hillingdon for the proposed development at Broadwater Lake.

1.1.2 The purpose of this statement is to provide a detailed response to the comments and concerns raised by the Council's Urban Design Officer during the planning application consultation process. It aims to demonstrate how the design team has positively engaged with previous feedback received and how the current proposals address the identified issues in a thoughtful, contextually appropriate, and sensitive manner.

1.1.3 In doing so, the document provides a clear and structured justification for the proposed development, supporting the application with a narrative that aligns with both local planning objectives and national policy frameworks.

1.2 Details requested to be secured via planning condition

This response has been compiled on the understanding that the following list of details will be secured via planning condition:

- Final materials schedule.
- Details of window framing and materials of the window frames.
- Details of bike shelters.
- Details of bin stores.
- Details of all activity areas (including the caving area)
- Details of all boundary treatments.
- Final external lighting scheme.

2.0 Responses to Pre-Application Urban Design Officer Comments

2.1 Spatial Impacts

2.1.1 Please refer to the table below.

<table>
<tr><th>Comment</th><th>Response</th></tr>
<tr><td>While it is acknowledged and welcomed that the scale of the built form has been reduced through the pre-app process. It is felt there remains elements of the scheme that could be reduced in building mass to reduce spatial harm to the openness of the Green Belt. These include:

The roof form that expands over the whole Operation Zone building that increases the building height by 3.3m. A flat roof would reduce the overall building mass and spatial impact on the Green Belt.

It was requested during the pre-app process that a green roof be considered as this would be an ecological benefit and appropriate to the site's context;</td><td>The proposed roof form has been carefully considered in relation to both operational requirements and landscape effects. The submitted LVIA demonstrates that, from the key visual receptors with the greatest potential views of the site, the development would result in no material or adverse impacts on views. As such, the additional height associated with the roof form does not give rise to discernible landscape or visual harm within the wider Green Belt context.

Notwithstanding this, the design has been amended to further reduce the perceived massing of the building. The eaves and ridge heights of the Operations Building have been lowered from 7.5m and 11m respectively to 7.2m and 10.5m. This reduction assists in minimising the building's profile while maintaining the functional requirements of the facility.

The internal floor-to-ceiling heights within the Operations Zone are driven by the spatial needs of the larger activity and observation areas. A flat roof solution would compromise these operational requirements and the safe and effective use of the spaces.

In relation to the request for a green roof, this was fully explored during the design process. However, green roofs and living walls are not permissible under the Client's insurance and maintenance constraints and therefore cannot be incorporated.

More broadly, the proposed buildings would occupy only 0.4% of the overall site area, with an Urban Greening Factor of 0.98 (where 1 represents a fully natural site). In this context, green roofs would provide only a negligible additional ecological benefit.

<table>
<tr><th></th><th>Whole Site (m^2)</th><th>Peninsula (m^2)</th></tr>
<tr><td>Building footprint</td><td>3077</td><td>3054</td></tr>
<tr><td>Area</td><td>783903</td><td>62818</td></tr>
<tr><td>Area that is building (%)</td><td>0.39</td><td>4.9</td></tr>
</table>
</td></tr>
<tr><td>There remains a concern that the Camping Zone building is excessively large, with a covered roof area that would be better served by a seasonal covering, such as awnings.</td><td>The Camping Zone building has been amended to reduce its overall footprint and massing. The footprint has decreased from 224sqm to 171sqm,</td></tr>
</table>

This approach would reduce the building's footprint and massing, and would also help prevent birds from nesting in the roof rafters, which could render the building unusable. Additionally, to better integrate the structure with its surroundings and further minimise its mass, a flat green roof would be a more suitable option.	with the eaves lowered from 3m to 2.6m and the ridge reduced from 5m to 4m. In response to previous feedback, the design has been revised so that only the changing block has a permanent roof. The activity shelter will comprise an open structure capable of being seasonally covered with tensile material, reducing the extent of permanent built form. Whilst a flat roof has been considered, a pitched roof is more consistent with the simple rural shed typology of the surrounding context and therefore integrates more appropriately with the landscape. The form also allows space for services and effective rainwater runoff. The provision of sheltered, adaptable space is essential to support inclusive use of the site, particularly for participants with disabilities or sensory needs, enabling safe and extended use in varying weather conditions and ensuring compliance with the Equality Act. Overall, the revisions significantly reduce built mass while maintaining the functional and accessibility requirements of the facility.
Similarly, the anglers' huts would benefit from flat green roofs, reducing their visual impact while providing ecological benefits to the site.	As set out above, green roofs are not permissible due to the Client's insurance, maintenance, and fire safety requirements. A pitched roof form is considered more appropriate within the rural context, reflecting the character of simple agricultural and ancillary structures. It also supports effective rainwater runoff and long-term durability. As such, the proposed design achieves a practical and visually sympathetic solution for the site.
To minimise harm to the openness of the Green Belt, the design for the new HOAC and BSC facility should explore all possible options to reduce both the building footprint and overall massing. It should also be clarified that the decommissioned HOAC site has been returned to landscape as replacement for the spatial impact on the Green Belt on this site.	The proposed footprint and massing have been carefully reviewed throughout the design process and reduced where practicable. Any increase in built form is driven by identified operational needs, including addressing existing shortfalls in accessible changing provision and WC facilities, and ensuring compliance with current Building Regulations, best practice guidance, space standards, and the requirements of the Equality Act. The justification for the proposed spatial allowances is set out in detail within document 1329-HAV-XX-XX-RP-A-S2-0013 *Schedule of Accommodation Statement (P02)*. The Applicant has discussed linking this requirement via a Section 106 Agreement with LBH. While the Applicant intends to restore and replant at the former HOAC site, it cannot be secured through a Section 106 Agreement as HS2 still have possession of the site and it is too early to be able

	to give detailed information on the proposed restoration and landscaping works.
Development in a SSSI and site of Metropolitan Importance for Nature Conservation The scheme has sought to respect the Site's SSSI designation delivering ecological enhancements which will be assessed by an ecologist and Natural England. Planning Services, Corporate From a landscape-character perspective, the quantum of development required to replace the HOAC and BSC, and its placement on areas of existing hardstanding with minimal tree loss, achieves the objective of retaining the landscape character while hosting the outdoor activities facilities. However, it will need to be demonstrated that the former sites have their buildings removed and are restored and planted as enhanced SSSI replacement areas.	The Applicant has discussed linking this requirement via a Section 106 Agreement with LBH. While the Applicant intends to restore and replant. at the former HOAC site, it cannot be secured through a Section 106 Agreement as HS2 still have possession of the site and it is too early to be able to give detailed information on the proposed restoration and landscaping works.

2.2 Site Layout

2.2.1 Please refer to the table below.

Comment	Response
However, as previously commented, the coach arrival area could be improved to create a better arrival space, trees in the native shrub beds and at the end of the bike store would help define this area.	The coach arrival area is intended to function primarily as a simple drop-off bay, comprising a widened section of pavement and an auto-tracked space to allow coaches to reverse and wait safely. It is not designed to operate as a gathering or formal arrival plaza. Given the modest scale of the space and the presence of established surrounding trees and native planting, additional tree planting is considered likely to over-dominate the area or conflict with safe vehicle manoeuvring. The current approach is therefore intentionally understated and proportionate to its limited function, while retaining existing vegetation. Notwithstanding this, we would be happy to discuss opportunities for minor landscape enhancements where these would not compromise safety or existing planting.
The Angler's store and W/C should be shown closer to the car park to reduce the amount of hard surfacing pathway, and distance for the utilities to reach the building. This would also enhance wayfinding to this building.	The proposed location has been selected to remain discrete within the landscape and to avoid impacts on existing trees and established vegetation. Positioning the building closer to the car park would require greater encroachment into these areas and increase the visual presence of built form at the site entrance. Utilities will in any case need to be routed to the main gate to serve CCTV and other infrastructure; therefore, the position of the Angler's Store and W/C would not materially reduce service runs. The current siting is considered to provide a more sensitive and landscape-led solution while remaining easily accessible from the car park.

2.3 Building Appearance

2.3.1 Please refer to the table below.

Comment	Response
Operations Building The earlier iteration, with flint walls and a standing seam roof, provided a clear distinction between these two elements, which was a positive aspect of the design. In contrast, the introduction of standing seam material on some wall surfaces gives the building a more commercial appearance that feels out of keeping with its rural context. Additionally, this material on vertical surfaces carries a high risk of bubbling and may be prone to staining and surface discoloration from bird droppings. While it is acknowledged that the entrance should be expressed in a different material, this should ideally be a natural finish that better reflects the site's character such as hanging clay tiles.	The turning down of the Zinc roof onto some of the walls will help to blend the building into the surrounding warm tones of the woodland. Although it can be used in commercial settings, there is also precedent for its use in rural contexts as a more durable alternative to timber cladding. Zinc is a durable, fully recyclable material with a life expectancy of over 100 years, reducing the need for future interventions. It also develops a protective patina over time, which will help it blend into the natural surroundings. Although zinc and other metals, produced from a coil, can display signs of "Oil Canning" or "Bubbling", this is reduced considerably by using a thicker material (0.8mm) and having narrower standing seam widths for cladding (Maximum 430mm, compared to up to 600mm on a roof). The proposed finish allows for a natural organic pigment to be infused in a resilient resin coating, still allowing for the natural grain of the zinc to be visible. The application of this finish also provides additional protection to the zinc. Zinc also benefits from not needing any maintenance, other than an annual inspection and cleaning of gutters. The natural rinsing from rainwater is enough to keep the zinc in optimal condition. Overall, zinc provides a long-lasting, low-maintenance solution that respects the site's rural character while ensuring the durability and resilience of the building fabric.
Furthermore, the inclusion of curtain walling at the centre of the building to enclose the stairway introduces another material that appears incongruous with the rest of the design.	The curtain walling has been included to enclose and protect the stairway and lift users from the elements within the thermal envelope, ensuring comfortable and safe access in all weather conditions. The glazing also serves to break up the building mass, reducing its visual impact on the Green Belt and helping the building integrate with its rural surroundings. This enclosed area is essential for accessibility, providing safe, comfortable circulation for all users, including those with disabilities or sensory needs, while maintaining visual connection to the surrounding landscape.
There also remain concerns that the central roof form is overly complex and presents a large, sheer expanse facing the most active	The central roof reaches its highest point where the two building pitches meet, providing sufficient slope

part of the site. It is recommended that further consideration be given to this element.	for effective rainwater runoff. The roof void will accommodate plant and IT equipment, which cannot be located at ground floor due to flood risk. This approach also allows the building footprint to be reduced, minimising spatial impact on the Green Belt. The head of the curtain walling and roof turn-down helps define the central courtyard, the main congregation area, while providing a buffer between activity areas and the adjacent protected woodland. This reduces potential disturbance to birds and other habitats, balancing operational requirements with ecological sensitivity.
Safety Building The safety buildings should create the second of a pair of buildings that appear similar in materiality and design. The flint and standing seam roof follow this design intent. However concern is raised that the PVs are shown on the most visible west elevation.	To achieve the power output required to comply with Part L2 of the Building Regulations and to align with the London Plan's energy hierarchy (including on-site renewable energy generation and carbon reduction expectations), approximately 500 m² of PV panels will be installed on the roofs of the Safety Zone and Camping Zone buildings. These arrays will be dedicated and metered to meet the regulated energy demands of the site, contributing to both statutory performance standards and the Mayor's carbon reduction objectives. The Safety building roof provides the largest area at an appropriate pitch for the PVs. The panels will be integrated to follow the plane and proportions of the pitched roof, appearing almost flush and cohesive with the roof form. Their natural, deep dark finish minimises visual prominence on the west elevation. Locating the PVs on the single-storey Safety and Camping Zone roofs also provides the safest option for access and maintenance, reducing the risk associated with working at height.
Further the exposed structure appears awkward adjacent to the solidity of the flint. More explanation is required for this element, to explain the roof material and structure material.	The central yard of the Safety Zone is partially covered to provide shelter while maintaining the open, light space needed for boat maintenance and repair. The exposed structure where the roof is cut out provides a deliberate contrast to the flint walls. In combination with the gates, this helps break up the building mass, creating the appearance of two distinct buildings and reducing the visual impact of the roof form, while enhancing permeability and visual interest. The ability to maintain and repair boats on site is essential to the operational and financial viability of the facility, and the partially covered yard is a key enabler of this activity.
Anglers Hut/Camping Zone/BSC Store Clarification is also sought on whether the BSC store remains part of the proposal.	All storage for the BSC will be accommodated within the proposed Safety Equipment Store located in the Safety Zone. No separate BSC store is proposed.

All smaller, subservient buildings associated with the main operations and safety zone buildings should use a consistent palette of materials. Their design and materiality should present a more rural character than the two main buildings. Black painted, wavy-edged weatherboarding is recommended.	'Wavy-edged' weatherboarding was considered but is not robust enough to meet the Client's nor building users' operational and maintenance requirements. Vertical zinc cladding has therefore been used as a durable, low-maintenance material. The same material palette is applied across all buildings on site, creating a cohesive family of buildings with a consistent design language.
Bike Shelter/Bin Store The bike shelter would be better arranged as a single long row of stands. This would provide a neat edge to the car park and reduce the overall building footprint. The proposed materials for both the bin store and bike store are required at the next stage of design development.	 The suggested arrangement of the bike shelter as a single long row of stands can be explored at the next design stage. Material finishes and detailed layout will be confirmed as part of the planning conditions.

2.4 Landscape

2.4.1 Please refer to the table below.

Comment	Response
Concern is raised that detail section 9 should use gabions rather than the repurposed concrete to build up the level for tree planting edge. Concrete is unlikely to allow sufficient water to penetrate to allow the long term health of the trees.	We suggest that the detailed design of the tree planting edge, including the choice of gabions versus repurposed concrete, is developed at RIBA Stage 4 and discharged through a planning condition. We are happy to engage with the Council to ensure the most appropriate horticultural solution is achieved.
Detail section 1 is missing and needs to be provided. Details are also needed for the caving area and zip wire.	The zip line has been omitted from the scheme. The detail for the caving area will be provided at RIBA Stage 4 and can also be governed by a planning condition. The proposed system will follow a similar approach to the former HOAC facility, using stacked plastic tubes above ground. Apologies for the typographical error on the drawings—there is no Detail Section 1.
The masterplan shows vehicle access to the front of the Camping zone buildings with trolley park. It is considered that the hard surfacing should be reduce with vehicle access limited to the north side of the building.	Vehicle access to the front of the Camping Zone buildings is required to accommodate emergency vehicles and minibuses. However, the extent of hard surfacing can be reviewed, and the use of reinforced grass or Grasscrete-type surfaces is proposed to minimise visual impact and maintain a softer, more landscape-sensitive appearance.

2.5 Boundaries

2.5.1 Please refer to the table below.

Comment	Response
Apart from the 1.8m high V-Mesh security fencing along the canal edge, the boundaries are considered appropriate to the site's context. While the need for security along the canal is understood a methodology needs to be provided to ensure the existing trees along this edge will not be affected. Confirmation is also required that, along long runs of impenetrable fencing, appropriate measures will be included to allow animals to pass through.	The Landscape Strategy included within the DAS explicitly addresses both issues raised: • Excavations for fence posts will be carefully microsited to avoid impacts on existing tree roots. • Measures to maintain wildlife connectivity along the canal edge will be incorporated

	where the fencing forms long, impenetrable runs. We recommend that these detailed matters are developed and approved as part of a planning condition to ensure the long-term protection of trees and local ecology.

2.6 Lighting

2.6.1 Please refer to the table below.

Comment	Response
Lighting is limited to key areas of the site, with the aim of keeping it to a minimum due to the site's SSSI status. The ecologist will need to assess any potential impacts on local ecology. It should also be demonstrated that the lighting will only operate during restricted hours and solely when the site is in use.	The external lighting strategy will be carefully designed to be contextually appropriate, minimising impacts on wildlife and sensitive habitats, and reflecting the ecological guidance provided by Natural England. Lighting will be restricted to key areas, operate only during site use, and be limited in duration and intensity to reduce potential disturbance. Full details of the lighting design will be developed at the next stage and submitted for approval via planning condition to ensure compliance with ecological requirements and SSSI considerations.

3.0 Conclusion

3.1 This planning statement has been prepared to support the full planning application and to directly address the matters raised during the pre-application process.

3.2 The design team has carefully considered all comments, resulting in a scheme that reflects a thorough understanding of the site's context, ecological sensitivity, and the Council's design expectations. The proposals have evolved positively through this process, with particular attention to building massing, architectural language, integration with the wider landscape, and compliance with the Client's insurance requirements.

3.3 High-quality, contextually appropriate materials, including flint and zinc, have been selected to respond sensitively to the site's character, while ensuring durability, sustainability, and a refined architectural expression. The design respects the significance of the SSSI setting while delivering a functionally robust and visually coherent development.

3.4 Overall, the proposals represent a considered, collaborative, and policy-compliant approach. They support the long-term stewardship and active use of the site, meeting operational, insurance, and ecological requirements, and we respectfully request that the application be supported.