

#### Quod

# Very Special Circumstances and Development Benefits

Hillingdon Water Sports Facility and Activity Centre, Broadwater Lake, Harefield, UB9 6PE

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## 1 Introduction

- 1.1 This Very Special Circumstances and Development Benefits Statement has been prepared by Quod, on behalf of the London Borough of Hillingdon (LB Hillingdon) (Capital Works Department) ('the Applicant'). The Applicant is seeking planning permission for a new activity centre which will be known as The Hillingdon Water Sports Facility and Activity Centre (HWSFAC) ('the Proposed Development').
- 1.2 This Statement forms part of a wider planning application which is currently being determined by LB Hillingdon under planning permission ref. 2023/0782/S1 ('the Planning Application'). Since the submission of the Planning Application, a series of statutory consultee comments have been received and subsequent design amendments have been made. The Applicant has agreed to reduce elements of the Proposed Development to meet the essential requirements. Details of the Proposed Development are set out in the Planning Statement, prepared by Quod and the Design and Access Statement, prepared by Haverstock.
- 1.3 The Proposed Development will provide a replacement facility of the former Hillingdon Outdoor Activity Centre (HOAC) ('the former HOAC facility') which is located on Dews Lane, Harefield, UB9 6JN. The charity which previously operated at the former HOAC facility was the Colne Valley Youth & Community Association ('the Association') (Charity number: 1012242). The Association is a Youth Educational Charity which provides outdoor and environmental education for the whole community, but with priority given to young people, particularly those who are disadvantaged or disabled. LB Hillingdon owns the former HOAC facility, which the Association managed under a partnership agreement.
- 1.4 The National Planning Policy Framework (NPPF) (December 2024) ('NPPF 24') promotes sustainable development by integrating the following three pillars of sustainability:
  - An Economic Objective to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right place and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.
  - A Social Objective to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
  - An Environmental Objective to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, missing waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 1.5 The Site is located in the Metropolitan Green Belt, which is a national designation, designed to prevent urban sprawl by keeping land permanently open around urban areas. The Site is also within the Colne Valley Site of Special Scientific Interest (SSSI). SSSI's are designated by Natural England under the Wildlife and Countryside Act 1981.

- 1.6 The lake and surrounding area was previously used as a quarry for sand and gravel extraction between the 1960s and 1990s. The peninsula was formerly used as a gravel washing / processing plant with two silt lagoons and a landfill for inert quarry wastes. Various structures remain present on and in the vicinity of the peninsula associated with the aggregate use including a weighbridge, aggregate hoppers, pad foundations and areas of hardstanding. The Site is therefore defined as Previously Developed Land.
- 1.7 The Site is Grey Belt land as defined in the NPPF 24 and it meets the definition of appropriate development as set out in Paragraph 154(b). Notwithstanding, even if the Proposed Development were to be considered as "inappropriate development" within the Green Belt, there is a very strong Very Special Circumstances (VSC) case which outweighs any harm by reason of inappropriateness, and any other harm resulting from the Proposed Development.
- 1.8 For the avoidance of any doubt on whether the Proposed Development is acceptable in principle, this Statement has been prepared to demonstrate that there is a very strong VSC case. The benefits are set out in line with the three pillars of sustainability as set out in the NPPF 24 economic, social and environmental. These benefits should be afforded substantial weight during the determination of the Planning Application.
- 1.9 This Statement should be read alongside the Planning Statement, prepared by Quod, the Socio-economic Statement prepared by Quod Socioeconomics and the Non-Technical Summary for Ornithology prepared by Tetra Tech / RPS.

# 2 Planning Policy Context

- 2.1 Section 38(6) of the Planning and Compulsory Purchase Act requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 2.2 In this instance, the London Borough of Hillingdon Development Plan comprises; the Hillingdon Local Plan Part 1 (Strategic Policies) (November 2012), the Hillingdon Local Plan Part 2 (Development Management Policies) (January 2020), the Hillingdon Local Plan Part 2 (Site Allocations and Designations) (January 2020) and the London Plan (2021).
- 2.3 Material considerations include the National Planning Policy Framework (NPPF) (December 2024), the accompanying Planning Practice Guidance (NPPG) (March 2014) and relevant Supplementary Planning Documents (SPDs).

#### **National Planning Policy**

National Planning Policy Framework (NPPF) (December 2024)

Previously Developed Land and Grey Belt

- 2.4 Paragraph 153 of the NPPF 24 states that when determining planning applications, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness, other than in the case of development on Previously Developed Land or Grey Belt land, where development is not inappropriate.
- 2.5 The lake and surrounding area was previously used as a quarry for sand and gravel extraction between the 1960s and 1990s. The peninsula was formerly used as a gravel washing / processing plant with two silt lagoons and a landfill for inert quarry wastes. Various structures remain present on and in the vicinity of the peninsula associated with the aggregate use including a weighbridge, aggregate hoppers, pad foundations and areas of hardstanding. The Site is therefore defined as Previously Developed Land.
- 2.6 Grey Belt is defined in the NPPF 24 as land in the Green Belt which comprises Previously Developed Land and / or any land that, in either case, does not strongly contribute to any of purposes (a), (b) or (d) in Paragraph 143. The definition of 'Grey Belt' excludes land where the application of the policies relating to the areas or assets in Footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development. Footnote 7 includes SSSI's, but as is set out in the accompanying Planning Statement prepared by Quod, the location of the Site in this specific SSSI does not provide a strong reason to refuse or restrict development.
- 2.7 An assessment of the Site against purposes (a), (b) and (d) of the Green Belt has been carried out as part of the Planning Statement prepared by Quod. As set out in the Planning Statement, the Site clearly does not contribute to Green Belt purpose (a), (b) or (d) and in line with Paragraph 153 of the NPPF 24, an assessment of openness is not required as the Site is Previously Developed Land and meets the criteria to be defined as Grey Belt.

#### Appropriate Development

- 2.8 There is a very strong case that the Proposed Development is appropriate development, as defined in Paragraph 154 of the NPPF 24 which lists a number of exceptions for the construction of new buildings in the Green Belt, including:
  - "(b) The provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation...as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it".
- 2.9 The Proposed Development will provide buildings and facilities for outdoor sport and recreation and the openness is preserved, as demonstrated in the accompanying Landscape and Visual Impact Assessment (LVIA) prepared by Colour. It is therefore appropriate development.
- 2.10 Furthermore, Paragraph 155 of the NPPF 24 sets out four criteria where Green Belt should not be regarded as inappropriate. An assessment of the Proposed Development against the criteria is set out in the Planning Statement, prepared by Quod. The assessment concludes that the Proposed Development is appropriate development in the Green Belt. In addition to the fact that it falls within the definition of Grey Belt land and comprises appropriate development, it also fits one of the definitions of appropriate development, as listed in Paragraph 154(b).
- 2.11 This means that it is not necessary for the Applicant to demonstrate that Very Special Circumstances (VSC) exist in order for planning permission to be granted. However, in order to show the robustness of the case in favour of the grant of planning permission, the Applicant has also assessed the proposal on the basis that the demonstration of Very Special Circumstances is required.

#### Very Special Circumstances

2.12 Paragraph 153 of the NPPF 24 states that "inappropriate development" is, by definition harmful to the Green Belt and should not be approved except in VSC. VSC will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal is clearly outweighed by other considerations.

#### Planning Practice Guidance

- 2.13 The Planning Practice Guidance (PPG) supports the policies in the NPPF 24. The PPG was published in March 2014 but has since been updated.
- 2.14 The PPG sets out further guidance on what factors can be taken into account when considering the potential impact of development on the openness of the Green Belt. It states that where it is relevant to do so, a judgement based on the circumstances of the case must be made.

- 2.15 The PPG¹ sets out an example of how the courts have identified a number of matters which may need to be taken into account in making this assessment. These include but are not limited to:
  - Openness is capable of having both spatial and visual aspects in other words, the visual impact of the proposal may be relevant, as could its volume.
  - The duration of the development, and its remediability taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness.
  - The degree of activity likely to be generated, such as traffic generation.

#### **Adopted Development Plan**

#### London Plan (March 2021)

- 2.16 Policy G2 ('London's Green Belt') states that the Green Belt should be protected from inappropriate development. In line with the NPPF 24 it states that development proposals that would harm the Green Belt should be refused except where very special circumstances exist.
- 2.17 The policy also states that subject to national planning policy tests, the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported.

#### Hillingdon Local Plan: Part 1 – Strategic Policies (November 2012)

2.18 Policy EM2 ('Green Belt, Metropolitan Open Land and Green Chains') states that any proposals for development in the Green Belt will be assessed against national and London Plan policies, including the very special circumstances test.

#### Hillingdon Local Plan: Part 2 – Development Management Policies (January 2020)

- 2.19 Policy DME14 ('Development in the Green Belt or on Metropolitan Open Land') states that inappropriate in the Green Belt will not be permitted unless there are very special circumstances. It states that redevelopment on sites in the Green Belt will be permitted only where the proposal would not have a greater impact on the openness of the Green Belt, and the purposes of including land within it, than the existing development, having regard to:
  - The height and bulk of the existing building on the site;
  - The proportion of the site that is already developed;
  - The footprint, distribution and character of the existing buildings on the site;

<sup>&</sup>lt;sup>1</sup> Paragraph: 013 Reference ID: 64-013-20250225

- The relationship of the proposal with any development on the site that is to be retained; and
- The visual amenity and character of the Green Belt.
- 2.20 The accompanying text to Policy DME14 recognises that any such development will need to demonstrate VSC to set aside the presumption against such development and that VSC to justify otherwise inappropriate development will not exist unless the potential harm by reason of inappropriateness, and any other harm, is clearly outweighed by other material planning considerations.

# 3 Social and Community Benefits

#### Context

- 3.1 VSC can be established if the social and community benefits of the Proposed Development are deemed significant enough to outweigh the harm to the Green Belt.
- 3.2 The social and community benefits of outdoor activity centres should not be underestimated and contribute to towards Very Special Circumstances, particularly when cumulatively assessed alongside the economic and environmental benefits. The former HOAC facility was a much-loved facility locally and one of the main benefits of the facility was that it provided a space for disabled and more vulnerable people to learn to sail and enjoy a rural outdoor setting. The former HOAC facility enjoyed long standing partnerships with schools and scout groups such as the 1st Chalfont St Giles Scouts. In addition to schools, colleges and other educational organisations, the former HOAC facility was a preferred location for Special Educational Needs (SEN) schools, as they offered a one-hour course of a single activity of choice. Some students at the SEN schools could not attend a full-day course due to their disability and the proximity of Dews Lane to their home supported this option, keeping travel times down.
- 3.3 The HOAC facility was also used by Pupil Referral Units (PRU), which is an alternative education facility designed to support children and young people who are unable to attend mainstream education for a variety of reasons such as difficulty integrating into the traditional school environment. There was also very little noise pollution at the former HOAC facility, similar to Broadwater Lake, which allowed a calm, quiet countryside space to those living in nearby urban locations.
- 3.4 The former HOAC facility offered a young leaders' scheme, which provided a highly effective route for young people to qualify and join as a staff member. The Young Leaders' scheme enabled volunteers to help out on the courses and then become instructors. Between 2013 and 2019 there was an average of 14 young leaders who took part in the course annually<sup>2</sup>.
- 3.5 The former HOAC facility also ran a successful training programme for teachers, which then allowed them to run many of the land activities. This reduced the cost for schools, colleges and other educational establishments and other organisations such as guides, scouts and cadets.
- 3.6 The facility was valued by those who used it. The intangible community benefits and support from the local community are further evidenced in the letters and comments of support received from the community to the submitted planning application for the previous scheme, provided at **Appendix 1.**

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<sup>&</sup>lt;sup>2</sup> HOAC Centre Reports – 2013 to 2019.

#### Provision of a facility for a wide range of user groups

- 3.7 A key benefit of the Proposed Development is that it will provide land and water based activities and overnight accommodation for a diverse range of user groups.
- 3.8 The Proposed Development will provide tailored programmes, expert management and partnership with user groups, to provide a rare and valuable resource for all users. The Proposed Development will ensure the highest safety standards with staff trained to provide support as needed. This will create a supportive environment for people nervous about partaking in land and water sports by ensuring activities and equipment are adaptable and that instructors can accommodate all needs.
- 3.9 There will also be a joined up approach with other LB Hillingdon programmes such as social care, youth organisations and SEND groups, amongst others. Details of these user groups and how they will benefit from the Proposed Development are set out below.

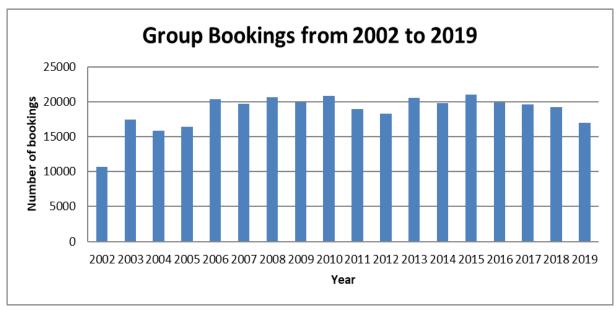
#### Schools and educational establishments

- 3.10 Outdoor activity centres such as the Proposed Development provide an essential role supporting outdoor education, skill development and mental and physical health of children and young people. Approximately 306,000 people live in LB Hillingdon, of which 64,000 (21%) are under the age of 16, and a further 35,000 (11%) are aged 16 to 24 years<sup>3</sup>.
- 3.11 The Proposed Development will be used by schools and other educational establishments for both day trips and overnight stays. Residential trips, summer camps and activities contributing towards the Duke of Edinburgh Award will all be offered at the proposed facility. School children aged six and above will use the Proposed Development and will visit with teachers, parents, guardians and carers. In addition, different school groups with children of diverse ages, abilities, genders, religion and backgrounds could all be using the Proposed Development concurrently.
- 3.12 The former HOAC facility was primarily used by local schools, colleges, guides, scouts and cadets. The majority of organisations were located within a 20-kilometre radius of the site. The former HOAC facility was ideally located for many schools and colleges in West London and other surrounding areas due to the proximity to the M40 and M25.
- 3.13 Nearly half of the facilities income came through group bookings<sup>4</sup> which consisted of school and college groups, guides, scouts, cadets and other youth groups. **Figure 1** shows the number of group bookings from 2002 to 2019. The number of group bookings exceeded 20,000 in 2006, 2008, 2010, 2013 and 2015. Between 2002 and 2019, there was an average of 18,681 group bookings. The data relating to the number and type of users post-2019 is skewed given the impacts of the Covid-19 pandemic and the construction of HS2 on the operation of the former HOAC facility.

<sup>&</sup>lt;sup>3</sup> 2021 Census.

<sup>&</sup>lt;sup>4</sup> HOAC Centre Report – 2016





3.14 The number of students at the former HOAC facility on a weekday was dependent on the school or organisation, as SEN schools and Pupil Referral Units (PRUs) visited the former HOAC facility in smaller groups. A Traffic Survey for one week a month in 2015, on a Monday to Friday, between 0800 and 2100 was undertaken for planning application ref. CM/22/16. The figures were not submitted as part of the planning application, but they are set out below at **Table 1.** 

Table 1: Traffic Survey Results (2015)

Month	Staff	Groups*	Members	Total
January	5	16	0	21
February	6	16	0	22
March	8	32	2	42
April	8	32	4	44
May	9	96	15	120
June	11	160	55	226
July	17	160	55	232
August	21	16	195	232
September	11	64	2	77
October	9	32	0	41
November	7	16	0	23
December	6	16	0	22

<sup>\*</sup>Groups are minibuses, which typically held 16 children, students and / or adults. The total figure given is the number of people in the group.

- 3.15 The 2015 traffic survey results demonstrate that an average of 186 people visited the site on a weekday, in between the months of April and September. This consists of staff, groups and individual members. The 2015 traffic survey results demonstrate that an average of 100 students visited the site on a weekday, in between the months of April and September.
- 3.16 The programmes to be offered by the Proposed Development provide invaluable opportunities for young people, particularly for children from deprived backgrounds. The Proposed Development will provide them with new opportunities, skills and gateways into further and higher education. Outdoor activity training grounds and secure camping facilities such as that at the proposed facility are often required to facilitate these programmes and development of skills.
- 3.17 Small school groups, including children from PRUs will visit the proposed facility regularly. The Proposed Development has been designed and is in a location which can support children and young people who are unable to attend mainstream school for various reasons, such as short or long-term illness, exclusions, or difficulties integrating into a traditional school environment. PRU's offer a more tailored and supporting learning environment to help the students reengage with education.
- 3.18 The ability to offer a service for students attending PRUs is of particular importance as the Hillingdon Youth Justice Service 5-Year Strategy (Draft) (2024-2029) confirms that over the last five years, LB Hillingdon have experienced a reduction of Education, Training and Employment (ETE) providers and face barriers to achieving ETE places for children. The Proposed Development therefore presents an excellent opportunity to provide new ETE places.

#### Children, young people and adults with additional needs

- 3.19 A key focus of the Proposed Development is to provide accessible opportunities for all users, including those with additional needs or disabilities.
- 3.20 According to the 2021 Census<sup>5</sup>, there are 39,500 residents in Hillingdon (13% of the population) who are disabled as defined under the Equality Act (2010), namely with "a physical or mental impairment" that has a "substantial and long-term negative effect on the person's ability to carry out normal day-to-day activities" <sup>6</sup>.
- 3.21 Of those residents who are disabled, 3,200 are under the age of 16. There are a total of eight special schools (SEN) in LB Hillingdon with 1,150 pupils on roll, according to the annual School Census data<sup>7</sup>.
- 3.22 Evidence suggests that learning in natural environments can be of particular benefit to specific groups such as children suffering mental distress, those with self-perceived social and

<sup>&</sup>lt;sup>5</sup> Office for National Statistics, 2021. Census.

<sup>&</sup>lt;sup>6</sup> Equality Act 2010, s.6(1).

<sup>&</sup>lt;sup>7</sup> Department for Education, 2024. Schools, Pupils and their Characteristics. (Annual School Census data).

personal skills<sup>8</sup>, children on the autistic spectrum<sup>9</sup> and those with other special needs<sup>10</sup>. Furthermore, a study of the use of forest environments in educational settings for boys aged 101-12 suffering 'extreme mental trauma' found increased levels of trust, exploratory activity and social cohesion<sup>11</sup>.

- 3.23 People with disabilities or additional needs often face barriers to partaking in outdoor activities due to the lack of tailored resources, inaccessible provision and unwelcoming environments. Many outdoor activity centres are not fully accessible and the former HOAC facility was challenging to adapt to improve accessibility, which limited access for some individuals.
- 3.24 The Proposed Development has been designed to ensure that children, young people and adults with disabilities and additional needs including mental health challenges, autism, learning disabilities, neurodivergence and visual impairment can utilise the activities. These users need to be able to use all the same facilities as their non-disabled peers. As such, the Proposed Development has been designed to cater to a wide range of needs. Further details can be found in the Design and Access Statement, prepared by Haverstock.
- 3.25 SEN students made up approximately 10% of the total users of the former HOAC facility <sup>12</sup>. The proposed facility will offer a one-hour course of a single activity of choice given that some SEN users cannot attend full-day courses due to their disabilities. There will also be very little noise pollution emulating from the site which is important as some students with disabilities such as Autism Spectrum Disorder (ASD), sensory processing disorder or ADHD can find being located close to a noise-generating facility or activity to be very problematic. A noisy environment can interfere with the ability to focus, listen and process information. This can be particularly challenging for SEN students who already face difficulties with cognitive processing, speech or auditory problems.
- 3.26 The importance of an accessible facility was recently highlighted by the Planning Inspectorate as part of a successful appeal at Walnut Tree Farm in Warrington<sup>13</sup>. The appeal allowed a golf leisure and recreational facility in the Green Belt, which was fully enabled for people with disabilities through the provision of larger bays and circulation areas that would allow full wheelchair access as well as technology that specifically catered for disabled golfers.
- 3.27 When assessing the VSC case, the Inspector's Report concluded that the accessibility of the proposed development was considered to be a significant benefit which attracted "very substantial weight" in favour of the proposal. The same weight should be afforded to the Proposed Development during the determination of the planning application.

<sup>&</sup>lt;sup>8</sup> Scrutton, R.A., Outdoor adventure education for children in Scotland: quantifying the benefits. Journal of Adventure Education and Outdoor Learning, 2015. 15(2): p. 123-137.

<sup>&</sup>lt;sup>9</sup> Blakesley, D., M. Rickinson, and J. Dillon, Engaging children on the autistic spectrum with the natural environment: Teacher insight study and evidence review. 2013.

<sup>&</sup>lt;sup>10</sup> Fiennes, C., et al., The Existing Evidence Base about the Effectiveness of Outdoor Learning. Institute of Outdoor Learning, Blagrave Trust, UCL & Giving Evidence Report 2015.

<sup>&</sup>lt;sup>11</sup> Roe, J. and P. Aspinall, The Emotional Affordances of Forest Settings: An Investigation in Boys with Extreme Behavioural Problems. Landscape Research, 2011. 36(5): p. 535-552.

<sup>&</sup>lt;sup>12</sup> Paragraph 12. High Speed Rail (London – West Midlands) Bill Petition Session 2013-14

<sup>&</sup>lt;sup>13</sup> APP/M0655/W/24/3350472

#### Guides, Scouts and Cadets

- 3.28 Local guides and scout groups will use the Proposed Development, visiting for the day or overnight. The gender and age split may be mixed or focussed.
- 3.29 Sea, army and air cadets will also use the Proposed Development. Sea cadets include children aged 10 or above and army and air cadets include children age 12 and above. Again, the gender and age split may be mixed or one-sided. Whilst the former HOAC facility provided a very well used and valuable resource for outdoor activity, its facilities were outdated, incomprehensive and non-compliant with standards and legislation which made it challenging at times to host organisations with a gender and / or age split.

#### Other Educational Establishments

- 3.30 The Proposed Development will provide the opportunity for partnerships with universities, local colleges and other education providers. A number of educational establishments have already approached the Applicant expressing interest in the Site including:
  - Brunel University London: Brunel University have advised that they are willing for their students to become involved with the new facility and to support courses for young people as a negotiated part of their university experience. Brunel University had previously been involved in a similar manner with the former HOAC Facility.
  - University of Northampton: given the proposed facility is located in a SSSI (whilst also being a safe and controlled site), the University of Northampton have expressed interest in using the Site for long-term studies as part of undergraduate and postgraduate research. Data collected through monitoring the site (during the opening months of April to September) over multiple years will enable the tracking of changes and trends in the ecosystem which will help inform long term site management and reinforce its use by others for education. This will provide benefits to the SSSI as there will be a better understanding of how the SSSI is evolving, what species are present, arriving or leaving the site and will help ecologists at a national level to better understand the SSSI.
  - Rural Activity Garden Centre: the nature of the Site also presents the opportunity for horticulture training both on and off site. The Rural Activity Garden Centre in Drayton (which is run by the Applicant), provides work experience opportunities for people with additional needs. It is proposed that HWSFAC will partner with the centre to grow and provide plants, shrubs and trees to be used in the delivery of new woodland and planted areas.
- 3.31 These relationships will help establish the Proposed Development as a centre for learning.

#### Broadwater Sailing Club (BSC) Members

- 3.32 Sailing for private members will continue on the lake as is currently the case, but BSC will relocate from the north of the lake to the proposed facility.
- 3.33 Sailing members will therefore require access and use of the facility throughout the year. This will include the use of the storage facilities, workshop and changing facilities during training

- and maintenance periods, as well as an observation room to allow families to gather during both training sessions and races.
- 3.34 The existing BSC clubhouse currently sits on a high-pressure gas main and the building itself is in poor condition. It is clearly not fit for purpose and does not provide modern facilities for its members. The Proposed Development will provide suitable accommodation with changing facilities and a social area for the BSC members and will allow their current site to be repurposed as an ecological area. This benefit to the BSC community should be given weighting.

#### **Families**

- 3.35 Families will require access and use of the facility throughout the year for sailing and between April and October for all other water and land based activities.
- 3.36 Children may be accompanied by their parents, guardians or carers who could have other children with them of different ages and genders.

#### **Emergency Services**

- 3.37 The Proposed Development will provide a unique opportunity to provide training for emergency services personnel. Emergency services have expressed interest in using the artificial caves for dummy emergency rescue practice.
- 3.38 There is a clear social benefit in providing a facility which can cater for and provide specialist programmes for schools, other educational establishments, children, young people and adults with additional needs and other groups.

#### Outdoor activity health and wellbeing benefits

3.39 A key benefit of the Proposed Development is that it will provide a range of health and wellbeing benefits for its users.

#### Wellbeing benefits

- 3.40 Outdoor activity has a positive impact on mental health, releasing endorphins and reducing stress, depression and anxiety. It can also be a good outlet of energy and frustration for children and young people.
- 3.41 Outdoor activity centres such as the Proposed Development also play an important role in mitigating risks of crime, substance abuse, low academic attainment and poor mental health. As well as mental health, poverty is linked to a range of risk factors amongst young people including higher rates of low academic attainment, substance misuse and crime and anti-social behaviour. Of children in the Hillingdon Youth Justice System, an average of 39% had a screened or identified need for an intervention to improve mental health or emotional wellbeing compared to the national average of 26% (2023/24)<sup>14</sup>.

<sup>&</sup>lt;sup>14</sup> Hillingdon Council, 2024. Draft Hillingdon Youth Justice Service 5-Year Strategy.

- 3.42 An increasing number of children and young people are suffering from mental health conditions. One in six children aged 5-16 and one in four young people age 17-19 are likely to have a mental health problem<sup>15</sup>. These rates have gone up significantly over the past few years due to a range of factors including lasting impact of the Covid-19 pandemic, impact of social media and increased financial strain within families due to the Cost of Living Crisis. It is estimated that 31% of children in LB Hillingdon are living in poverty<sup>16</sup>.
- 3.43 At a national level, Green Social Prescribing is a new government initiative with the aim of preventing and tackling mental ill health through enhanced use of nature-based settings and activities. A recent evaluation<sup>17</sup> of the initiative highlighted significant benefits including enhanced wellbeing, reaching a broader range of people compared to many other social prescribing initiatives, and being a cost effective way to support people across a wide spectrum of mental health needs.
- 3.44 The Natural England State of Natural Capital Report for England (2024)<sup>18</sup> states that experiences of nature-rich places are important for our mental well-being. It states that data from 2018 shows that 17.7% of the UK population suffers from mental health issues<sup>19</sup> and there is evidence that spending time in nature improves our physical and mental health and wellbeing<sup>20</sup>.
- 3.45 Furthermore, evidence suggests that there is a disparity in who participates in outdoor learning, with individual studies suggesting that children from poorer families, black and minority ethnic groups, and those with low incomes in adulthood are less likely to have the opportunity to engage in learning in natural environments, potentially widening inequalities<sup>21</sup>.

#### Health benefits

3.46 Outdoor activities are associated with a wide range of health benefits. Physical activity plays a key role in supporting physical health including reduced risk of obesity, cardiovascular disease, and some cancers<sup>22</sup>.

<sup>&</sup>lt;sup>15</sup> Action for Children, 2024: https://www.childrenssociety.org.uk/what-we-do/our-work/well-being/mental-health-statistics

<sup>16</sup> Trust for London – proportion of children in poverty after housing costs (2021/22): https://trustforlondon.org.uk/data/child-poverty-borough/

<sup>&</sup>lt;sup>17</sup>. Defra, 2024. National Evaluation of the Preventing and Tackling Mental III Health through Green Social Prescribing Project (Defra Project Code BE0191).

<sup>&</sup>lt;sup>18</sup> ONS 2023. UK natural capital accounts: 2023. Available at: https://www.ons.gov.uk/economy/environmentalaccounts/bulletins/uknaturalcapitalaccounts/2023

<sup>&</sup>lt;sup>19</sup> OECD/EU 2018. Organisation for Economic development and Co-operation/European Union. Health at a Glance: Europe 2018: State of Health in the EU Cycle, Paris, OECD Publishing.

<sup>&</sup>lt;sup>20</sup> Lamont, R. A., and Hinson, C. 2024. A narrative review of reviews of nature exposures and human health and wellbeing in the UK. Natural England. NEER030.

<sup>&</sup>lt;sup>21</sup> Dillon, J. and I. Dickie, Learning in the Natural Environment: Review of social and economic benefits and barriers. Natural England Commissioned Reports, 2012(092).

<sup>&</sup>lt;sup>22</sup> Sport England (2017) Review of Evidence on the Outcomes of Sport and Physical Activity. A Rapid Evidence Review – May 2017.

- 3.47 The national curriculum set by the Department of Education<sup>23</sup> recognises the benefits that outdoor and adventurous activities can have to child development, stating that pupils should:
  - "Swim competently, confidently and proficiently over a distance of at least 25 metres either in key stage 1 or 2;
  - Take part in outdoor and adventurous activity challenges both individually and within a team in key stage 2;
  - Take part in outdoor and adventurous activities which present intellectual and physical challenges and be encouraged to work in a team, building on trust and developing skills to solve problems, either individually or as a group in key stage 3; and
  - Take part in further outdoor and adventurous activities in a range of environments which present intellectual and physical challenges, and which encourage pupils to work in a team, building on trust and developing skills to solve problems, either individually or as a group in key stage 4".
- 3.48 Physical activity and obesity are both pressing issues affecting health. At a local level, LB Hillingdon's Health and Wellbeing Strategy<sup>24</sup> states that amongst school-age children, one in five children at Reception classified as overweight or obese and by Year 6, this proportion has increased to one in three. Support for children, young people and their families to have the best start and to live healthier lives in a key priority of the Health and Wellbeing Strategy. LB Hillingdon's Child Healthy Weight Partnership Action Plan<sup>25</sup> also seeks to work across partners to increase levels of physical activity to support LB Hillingdon's Health and Wellbeing Strategy.
- 3.49 In June 2025, the University of Derby hosted the 7th Nature Connections Conference which celebrated the work over recent years on Nature Connectedness. Following the conference, Natural England published a blog on 3rd July 2025 titled 'Supporting Wellbeing and Nature's Recovery learning from the 7th Nature Connections Conference'. Several issues were highlighted at the conference and in the Natural England blog, including the need for children at school to build stronger relationships with nature.
- 3.50 The Government launched a 25 Year Environmental Plan in 2018. The Plan is a long-term strategy focused on improving the natural environment. It consists of 66 indicators that track environmental change across 10 broad themes, aligned with the plan's goals. One of these indicators is Health and Wellbeing Benefits (reference G7) which is currently in interim form.
- 3.51 In 2022, Natural England started the RENEW project which is led by the University of Exeter and funded by the Natural Environment Research Council. The research aims to inform the government's work and national indicators under the 25 Year Environmental Plan (2018). It is a five year programme of research to develop solutions to one of the major environmental challenges that we face as a society the renewal of biodiversity. The research seeks to

<sup>25</sup> Hillingdon Council Healthy Weight Partnership Plan, Appendix 1. Health and Wellbeing Board Report (1 December 2020)

<sup>&</sup>lt;sup>23</sup> Department for Education (2014) The national curriculum in England: Framework document – December 2014.

<sup>&</sup>lt;sup>24</sup> Hillingdon Council, 2022. Health and Wellbeing Strategy

understand how exposure to natural spaces and biodiversity renewal impacts people, their interactions with and attitudes towards nature, as well as their health and wellbeing. The University of Exeter has stated that:

"...we will use the data to focus on how exposure to biodiversity renewal efforts, or other interactions with nature, might relate to how people feel about nature, and to health and well-being over time".

- 3.52 The Department for Environment Food and Rural Affairs<sup>26</sup> state that this indicator will aim to show the benefits to human health and wellbeing that can be gained through England's natural environments. This includes benefits gained from more people engaging with nature, but also more passive benefits through improvements in natural environments that may impact on human health and wellbeing. The indicator will aim to track changes for people in disadvantaged groups and others who may benefit the most.
- 3.53 The indicator has been informed by a growing body of research illustrated by a Defra funded Social Science Research Fellowship on the natural environment and human health (August 2018)<sup>27</sup> which concludes that:
  - There is strong and consistent evidence for mental health and wellbeing benefits arising from exposure to natural environments, including reductions in psychological stress, fatigue, anxiety and depression. These benefits may be most significant for marginalised groups. Socioeconomic inequality in mental well-being has been shown to be narrower among those who report good access to green or recreational areas, compared with those with poorer access.
  - The impacts of exposure to natural environments and direct use of green space often differ between social and demographic groups. Variation has been found in health outcomes associated with exposure to, in physical and psychological perceptions of accessibility, and in motivations for use of natural environments. Socio-economic inequalities in health are lower in greener living environments. Although lower socio-economic groups are thought to disproportionately benefit from natural environments, they often face the greatest barriers to use and the lowest levels of accessibility.
  - The quality and type of the environment appears to influence health outcomes; higher quality, biodiverse natural environments and those that are well maintained and in which people feel safe are associated with good health. Although much of the evidence relates to urban greenspace, there is evidence to suggest the exposure to other types of natural environment including broadleaf woodland results in greatest health gain.
- 3.54 The indicator has also been informed by Natural England's narrative view of nature exposure and human health and wellbeing in the UK<sup>28</sup> which concludes that:
  - Exposure to green space is as associated with psychological wellbeing, physical activity and linked health outcomes.

<sup>&</sup>lt;sup>26</sup> The Department for Environment Food and Rural Affairs Natural Beauty and Engagement - https://oifdata.defra.gov.uk/themes/natural-beauty-and-engagement/G7/.

 <sup>&</sup>lt;sup>27</sup> BE0109 Social Science Research Fellowship on the natural environment and human health. August 2018.
 <sup>28</sup> NEER030 A narrative review of reviews of nature exposure and human health and well-being in the UK.
 01 March 2024.

- Exposure to nature increases activity levels among children and young people.
- There is evidence for the psychological benefits of nature-based interventions, in particular reduced depression and improved mood.
- Growing evidence shows that blue space exposure is also beneficial for psychological well-being and physical activity.
- 3.55 The Natural England narrative review makes reference to a review undertaken by A. Bruckner which concludes that the improved quality of blue spaces leads to healthier lifestyles, but this is inferred through signs of increased use of and physical activity within these spaces<sup>29</sup>.
- 3.56 The land and water based activities at the Proposed Development will intrinsically contribute towards providing a range of health and wellbeing benefits in a nature based environment which helps to support positive health outcomes. It will provide a safe and accessible facility for a wide range of users, as supported by the Defra funded Social Science Research Fellowship (August 2018) and the suite of Natural England's evidence.
- 3.57 Finally, the UK's Environmental Improvement Plan (2023) aims for everyone to live within a 15-minute walk of a green or blue space such as a park, woodland or river. This initiative is part of the UK Government's broader strategy to improve the environment, enhance public health and address climate change.
- 3.58 The Wildlife and Countryside Link ('Link') are a coalition of 83 environmental organisations in England that work together to protect wildlife and the countryside. Link have prepared a briefing note<sup>30</sup> which sets out a strategic and long-term approach for the Government so that access for all to green or blue spaces within a 15 minute walk of home can be achieved. The briefing note includes a recommendation for the Government to introduce a new Environmental Rights Bill, which will include a new human right to a healthy, natural environment and access to environmental justice. This would require public authorities to act compatibly with this right, increasing the weight given to access to nature within policymaking and decision-making within central and local government.
- 3.59 The Proposed Development would be within a 15-minute walking distance of many properties located in South Harefield and Denham. It therefore helps meet the Government's initiative of ensuring that everyone lives within a 15-minute walk of a green or blue space.
- 3.60 There is clear health and wellbeing benefits in providing an outdoor activity centre such as the proposed facility and this should be provided significant weight in favour of the Proposed Development.

#### **Teaching lifelong skills**

3.61 Outdoor activity centres use nature as a dynamic classroom, fostering creativity, emotional intelligence and critical thinking through hands-on experiences. It enhances physical

<sup>&</sup>lt;sup>29</sup> Brückner, A., Falkenberg, T., Heinzel, C., & Kistemann, T. (2022). The Regeneration of Urban Blue Spaces: A Public Health Intervention? Reviewing the Evidence. Frontiers in Public Health, 9, 782101.

<sup>30</sup> Link, Delivering access for all to green or blue space within a 15 minute walk of home, 30 January 2024

- development, social skills, emotional well-being and academic engagement, whilst promoting a connection with nature and instilling a sense of environmental responsibility.
- 3.62 The Council for Learning Outside the Classroom (LOtC) Mark is a quality assurance scheme that supports and celebrates schools and educational settings who provide meaningful experiences beyond the classroom across the whole curriculum, indoors and out, on and off site. Early Years, Primary, Secondary Schools, SEND and ALN schools can apply for the LOtC Mark. The LOtC provides students with more opportunities to access high quality learning beyond the classroom experiences.
- 3.63 An Impact Report was published in June 2024 by the Waterways, Wildlife and Wellbeing Project that was designed collaboratively by LOtC and the Canal and Rivers Trust, with advice from the University of Derby's Nature Connectedness Research Group over an 18-month period. LOtC and the Canal and Rivers Trust supported schools in the West Midlands to help students connect with the natural environment, enhance wellbeing and embed learning beyond the classroom. The project was funded through the Green Recovery Challenge Fund (by Defra, Environment Agency, Natural England and National Lottery Heritage Fund).
- 3.64 The intention was to engage with young people, including from deprived areas and there was a strong correlation between participating schools and areas of highest deprivation across the target delivery areas. The report's key findings are summarised below:
  - Pupils recorded a significant impact on their learning.
  - 80% of teachers reported that learning outside the classroom had a positive impact on pupil enjoyment of, and engagement in, lessons.
  - Three quarters of teachers noted a positive impact on behaviour and two thirds reported a positive impact on pupil attainment.
  - Teachers scores relating to 'happiness', 'life satisfaction' and 'feeling things are worthwhile' increased.
  - Pupils reported a positive impact on their wellbeing, nature connectedness and proconservation behaviour.
- 3.65 The impact report makes reference to a Natural England Report<sup>31</sup> dated September 2022 which focuses on the impacts of learning in natural environments and the impacts of natural environments on learning processes and outcomes and health. The reports key findings are summarised below:
  - School students engaged in learning in natural environments have been found to have higher achievement (in comparison to their peers or projected attainment) in reading, mathematics, science and social studies, exhibiting enhanced progress in Physical Education and drama, and a greater motivation for studying science. Longer-term and 'progressive' experiences appear to result in the greatest benefits and children with

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<sup>&</sup>lt;sup>31</sup> Natural England. Links between natural environments, learning and health: evidence briefing (EIN063). September 2022

- below average achievements tended to make progress in learning outcomes to the greatest degree.
- In both adults and children, there is evidence that learning in a natural environment is associated with the accumulation of social capital and with fostering pride, belonging and involvement in the community. A review of evidence related to structured sustainability education taking place in the natural environment found it resulted in the promotion of a sense of community within and beyond the school.
- A schools based learning programme taking place in the natural environment was associated with some improvements in attendance rates. Further studies have found improved behaviour amongst children at a special needs school, sustained over two months, following learning in the natural environment<sup>32</sup>.
- Specific use of woods or forests as settings was associated with the acquisition of academic, social and personal skills, increases in confidence and self-esteem, and improvements in physical skills<sup>33</sup>
- 3.66 Data from the National Child Mortality Database shows that sadly, incidents of child drowning have increased over recent years, with the risk 3.5 times higher for children of Black and Black British ethnicity and 2 times higher for children from more deprived areas<sup>34</sup>. Data from the 2022 Active Lives Survey also shows that only 34.7% of children from low affluence families are able to swim 25 metres unaided, compared to 76.4% from high affluence families<sup>35</sup>.
- 3.67 The Proposed Development will provide water based activities, which will help teach individuals about water safety. This is a crucial skill for reducing the risk of drowning as it equips people with the necessary skills, knowledge and confidence to stay safe in open water.
- 3.68 The Field Studies Council (FSC) is an environmental education charity based in the UK who offer a wide range of courses, fieldwork opportunities and learning experiences focused on connecting people with the natural world. The FSC<sup>36</sup> state that:
  - "...outdoor experiences provide opportunities for development and growth, including exploration, hands-on learning and risk taking. When combined with a supportive programme designed for discovery and accomplishment, children gain skills and establish strong foundations for strengthening both life skills and subject knowledge".
- 3.69 The FSC states that outdoor learning teaches the following lifelong skills<sup>37</sup>:
  - Confidence building from spending their first night away from family or speaking out loud in front of peer groups, the challenges the children may face (and most importantly be supported to overcome) will undoubtedly empower them. Overcoming challenges

<sup>&</sup>lt;sup>32</sup> Fiennes, C., et al., The Existing EvidenceBase about the Effectiveness of Outdoor Learning. Institute of Outdoor Learning, Blagrave Trust, UCL & Giving Evidence Report 2015.

<sup>&</sup>lt;sup>33</sup> Lovell, R., L. O'Brien, and R. Owen, Review of the research evidence in relation to the role of trees and woods in formal education and learning. Forest Research, 2010.

<sup>&</sup>lt;sup>34</sup> National Child Mortality Database, 2022. National Drowning Report UK.

<sup>&</sup>lt;sup>35</sup> Sports England Active Lives Survey (2021-22).

<sup>&</sup>lt;sup>36</sup> https://www.field-studies-council.org/2023/06/12/why-outdoor-education-is-an-essential-part-of-every-childhood/

<sup>&</sup>lt;sup>37</sup> Ibid

increases a child's self-belief in their own abilities. Mastering new skills fosters an important self-confidence. Gaining confidence from one experience can transfer this positive attitude to facing challenges in other areas of their life.

- Building social skills outdoor education encourages teamwork and cooperation and offers opportunities to engage and collaborate in new groups. Learning to work as a team, negotiate and resolve disagreements is all part of the experience, increasing their social and emotional development and people skills. Children have the chance to mix with different groups, often forging new friendships, and meeting new members of teaching staff during school trips. Every positive relationship in a child's life offers the opportunity to learn something about someone, broadening their understanding of diversity, inclusion and widening their community.
- Supports mental well-being studies have shown that spending time in nature has an impact on mental health by reducing stress and anxiety and improving mood. Outdoors, children are free to move and bustle about, unrestricted from the confines of their classroom. The freedom of being outside encourages movement and curiosity, helping to create a shared experience among classmates, fostering a sense of belonging and forming a more positive involvement. Activities that increase enjoyment, limit low mood and banish boredom all work as protective factors in maintaining good mental health.
- Environmental awareness by participating in activities outdoors, children learn to develop an appreciation and respect for nature. They begin to understand the connections made between the natural world and their own lives. By developing an empathy for the creatures and environment they have enjoyed interacting with, children will start to feel a connection with the natural world, and as we all want to protect what we care about, experiencing nature as a classroom is a fantastic start to promoting the protection of our planet.
- Connection with nature experiencing the enjoyment of nature first-hand is the only way to create a connection. By introducing children to the outdoors, and opening up the opportunities it offers, we can spart a curiosity or ignite an interest that allows them to foster a lifelong connection. Leading an outdoors lifestyle is a far healthier way to spend our time than cooped up inside having a reason to get outdoors to start with can help encourage this attitude. If a child feels a sense of belonging to the natural world, they are far likely to return. This connection can follow them into adult life, meaning they are more likely to grow their connection with nature, leading to a healthier life overall.
- Risk-taking, resilience and adaptability outdoor education provides children with opportunities to take calculated risk and therefore a chance to develop resilience, increasing their adaptability to changing environments and situations. Resilience is recognised as playing a crucial role in promoting children's well being and preventing the onset of mental health issues. Resilient individuals are better equipped to bounce back from setbacks, maintain a positive mental attitude and thrive in the face of adversity. Outdoor environments provide opportunities for children to assess and manage risks. They learn to make informed decisions, assess their capabilities, and develop resilience by overcoming challenges and setbacks. By exposing children to these challenges in the outdoors, children learn to develop these life skills allowing them to build confidence, self-esteem and a sense of independence.
- <u>Learning by doing</u> experimental learning or learning by doing is a highly effective approach to learning. Engaging multiple senses, hands on learning promotes active participation and enhances the overall learning experience. By actively participating in a

- learning activity, children become more engaged in the process which helps to maintain focus and attention, leading to a better retention of information. This practical experience allows a child to understand concepts more deeply and develop a deeper understanding.
- Sensory engagement learning by doing often involves multiple senses, such as touch, sight and hearing, and engaging our different senses helps to reinforce learning and improve memory retention. Outdoor learning presents sensory engagement opportunities. Outdoor education provides an immersive and interactive learning experience, promoting active engagement, results in deeper understanding and better retention of knowledge and skills.
- Opportunities for new experiences learning outdoors provides opportunities for exploration and discovery.
- 3.70 To add to the FCS's list of skills, research from Natural England<sup>38</sup> in November 2022 assessed the potential social impact of learning outside the classroom in natural environments in primary school settings for England. The participating schools were drawn from schools which have the LOtC Mark and those that do not have the LOtC mark, but have it embedded into their regular practice.
- 3.71 The research concludes that it clear that learning outside the classroom is considered to be an important part of the overall learning experience for children in primary school. Staff confirm the notion that pupils enjoy spending time outside and seem to experience more varied social interactions when learning outside as opposed to the classroom.
- 3.72 It also concludes that learning in the natural environment supports children to develop their self-awareness and self-knowledge. It also results in an increase in children's ability to offer social support to others and to problem solve with increased confidence. Finally, emerging benefits from the study include the positive impact of peer working across a wide range of age groups and the widening of all round knowledge. Staff also reported the individual benefits to themselves and peers.
- 3.73 The Proposed Development will provide a safe and secure environment for children and young people to develop skills and confidence. As set out in the evidence above, these skills are transferrable to other areas of life and create lifelong benefits. The Proposed Development include woodland setting, which as according to Natural England in their 2022 report, is associated with the acquisition of academic, social and personal skills, increases in confidence and self-esteem and improvements in physical skills.
- 3.74 The Proposed Development will provide a facility for schools to provide learning outside the classroom, which is backed by organisations such as the Canals and Rivers Trust, Defra, Environment Agency, Natural England and National Lottery Heritage Fund. It also provides a location for fieldwork opportunities and learning experiences which focuses on connecting people with the natural world, which is backed by the FSC.
- 3.75 The importance of children's social, physical and educational activity was recently highlighted by the Planning Inspectorate in considering a successful appeal in North East Derbyshire<sup>39</sup>.

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<sup>&</sup>lt;sup>38</sup> Natural England. Social and economic benefits of learning in natural environments (November 2022)

<sup>&</sup>lt;sup>39</sup> APP/R1038/W/20/3265610

- The appeal allowed a new scout headquarters and the use of the surrounding land for outdoor recreation in the Green Belt.
- 3.76 The Inspector's Report noted that the Covid-19 pandemic has heightened awareness and the need for opportunities for children's social, physical and educational activity. When assessing the VSC case, the Inspector's Report concluded that the provision of a community facility for children carries very substantial weight in favour of the proposal.
- 3.77 The importance of interactive school activities for educational benefits was also highlighted by the Planning Inspectorate as part of an appeal in decision Hounslow<sup>40</sup> in 2017. The appeal allowed a children's zoo and adventure park in the Green Belt, which included activities such as high and low ropes, a zip line and a climbing wall / tower. The Inspector's Report states:
  - "...there would be potential educational benefits through the availability of focused interactive school activities...I accord these potential benefits significant weight".
- 3.78 When assessing the VSC case, the Inspector concluded that the educational benefits constituted considerations that amounted to VSC, which clearly outweighed the harm to the Green Belt by reason of inappropriateness.
- 3.79 There are clear educational benefits in proposing an Outdoor Activity Centre, such as the Proposed Development and this should be afforded significant weight.

#### **Volunteering Opportunities**

- 3.80 The Proposed Development will offer a range of volunteering opportunities. Volunteering offers a wide array of benefits, impacting both the individual volunteering and the wider community. It can improve mental and physical health, boost career prospects and foster a sense of purpose and belonging. Volunteering also provides opportunities to learn new skills, build confidence and connect with others, whilst also make a positive contribution to society.
- 3.81 Volunteers will offer support with both the water and land based activities. Volunteers will also assist with running and maintaining the proposed facility. The Proposed Development will be a modern and sustainable facility, which is expected to attract and retain a high number of volunteers.
- 3.82 The Proposed Development will be designed to be accessible and inclusive which means that volunteering opportunities will be accessible to those with disabilities or accessibility requirements. Volunteering opportunities will be offered to all groups, including women and young people and disadvantaged groups such as Gypsy, Roma Travellers, SEND students, asylum seekers and refugees, all of which would benefit from volunteering opportunities.
- 3.83 In summary, there are clear and very significant social and community benefits associated with the Proposed Development which should be afforded very substantial weight in the determination of the planning application.

<sup>&</sup>lt;sup>40</sup> APP/F5540/W/16/3160453

## 4 Economic Benefits

#### Context

- 4.1 VSC can be established if the economic benefits of the proposed development are deemed significant enough to outweigh the harm to the Green Belt. These benefits must be substantial, often involving contributions to the local economy, jobs or tourism.
- 4.2 Annual expenditure on tourism and recreation in the natural environment is estimated to have an annual value of around £2.5 million<sup>41</sup>. Annual expenditure on tourism and recreation in the natural environment is estimated at £10.6 billion for 2022, and the associated annual health benefits have been valued at around £7 billion<sup>42</sup>.
- 4.3 The Proposed Development will provide a new and improved outdoor activity centre at Broadwater Lake and although the use is inherently focused on leisure and outdoor activities, the Proposed Development will have wider spin-off benefits to the localised economy.

#### **Economic benefits associated with the Proposed Development**

#### Job Creation and Apprenticeship Opportunities

- 4.4 Employment opportunities at the Site are currently limited, with the Site only being used by Broadwater Sailing Club and Uxbridge District Angling Society.
- 4.5 At the time of closure, the former HOAC facility previously employed six full-time employees, four long-season employees (February to November), two seasonal employees who lived on site (April to October), 10 summer employees (July to August) and 20 part-time casual works. The summer and part-time employees were generally young people aged 18-24 living locally.
- 4.6 The proposed facility will employee up to six permanent staff, 14 seasonal staff and up to 10 adult volunteers who will be employed between 1<sup>st</sup> April and 31<sup>st</sup> September. Permanent staff will travel to the Site each day and seasonal staff will live on-site during the peak operational months of July and August.
- 4.7 The Proposed Development including the staff accommodation has been designed to be inclusive, which will ensure that there are opportunities for minority groups to be employed including those with accessibility requirements, disabilities, women and young people, SEND students, asylum seekers and refugees who could all benefit from employment or volunteering opportunities.
- 4.8 The volunteering opportunities (as set out at Section 3) will provide lead-on apprenticeship routes which will provide young people who have volunteered and worked at the Site to qualify as instructors once they turn 18. The former HOAC facility inspired many young people to

<sup>&</sup>lt;sup>41</sup> ONS 2023. UK natural capital accounts: 2023. Available at: https://www.ons.gov.uk/economy/environmentalaccounts/bulletins/uknaturalcapitalaccounts/2023
<sup>42</sup> ibid

pursue careers as instructors and coaches through this route. Apprenticeship opportunities will also be offered in maintenance and repairs on the Site, providing further opportunities for entry into work

- 4.9 The provision of an outdoor activity facility which is located in a relatively urban setting with benefits from public transport links has previously been viewed favourably by the Planning Inspectorate, particularly where there are local employment opportunities.
- 4.10 The Inspector for the aforementioned appeal in favour of a development in Hounslow<sup>43</sup> which allowed a children's zoo, adventure park, high and low ropes, a zip line and climbing / jumping tower attached significant weight to the employment benefits associated with the proposed development. The Inspector's Report states:

"The proposal would thus have the potential to provide local employment opportunities as well as an additional and unusual leisure facility in an urban setting which benefits from access by public transport....whilst there may be some degree of seasonality and flexibility in the jobs that would be created, these would still represent a distinct benefit within the area and there may be a greater degree of consistency in employment because of its urban as opposed to a more remote countryside location. I accord these benefits significant weight".

- 4.11 In assessing the planning balance, the Inspector noted that the proposed development would result in significant employment opportunities in an area that, within a national context, is one of the most deprived in the Country.
- 4.12 Out of the 316 local authorities in England, Hillingdon is ranked as the 141<sup>st</sup> most deprived<sup>44</sup>. In 2019/20, there were 11,671 children under 16 in low-income families in Hillingdon. This is 17.4% of children who live in the borough<sup>45</sup>. Although Hillingdon is not the most deprived area in London or indeed England, there are still high levels of deprivation, particularly in the wards of Townfield, Botwell, Yeading, Barnhill, Pinkwell, Yiewsley and West Drayton. The six-year trend set out in the Council's Joint Strategic Needs Assessment (2022) shows that the number of children and percentage of children living in low income families have an overall upward trend and this is getting worse in Hillingdon.
- 4.13 In addition, the Inspector for the aforementioned appeal at Walnut Tree Farm, Warrington attached moderate weight to the economic benefits associated with the proposed development, which included the creation of two full-time equivalent jobs.
- 4.14 Finally, the creation of new jobs throughout the construction and operational phase of a development was afforded significant weight by the Planning Inspectorate during an appeal in Dorset<sup>46</sup> which allowed outline planning permission for a surf lagoon, outdoor climbing wall and new visitor centre within the Green Belt.

<sup>&</sup>lt;sup>43</sup> APP/F5540/W/16/3160453

<sup>&</sup>lt;sup>44</sup> London Borough of Hillingdon. Joint Strategic Needs Assessment (2022). Section 6: wider determinants of health

<sup>&</sup>lt;sup>45</sup> Ibid

<sup>&</sup>lt;sup>46</sup> APP/D1265/W/23/3325232

4.15 In summary, the employment opportunities associated with the Proposed Development should be given significant weight during the determination of the planning application.

#### Creation of Transferrable Skills

- 4.16 Many of the skills that will be developed through volunteering or working at the proposed facility will be transferrable and attractive to other employers. LB Hillingdon has a large concentration of large employers in the Borough, due to the presence of Heathrow Airport. This includes the airport itself, British Airways, Coca Cola and Cannon UK, as well as thousands of small and medium sized enterprises and a growing logistics sector.
- 4.17 Future employers will likely look for indicators of reliability, previous work experience and other key skills such as understanding of health and safety. The Proposed Development is therefore a significant opportunity to support young people, particularly those NEET / disadvantaged in the labour market, into long term employment opportunities leading to improved economic outcomes for LB Hillingdon as a whole.

#### **Visitor Impact**

- 4.18 The Proposed Development will attract visitors who spend money on various services and goods. As the Proposed Development includes a number of water-sports facilities, this can often require the purchase or rental of equipment such as boats, kayaks, paddleboards, wetsuits and safety gear. This can drive sales in the local and broader economy.
- 4.19 The influx of users and visitors can also often stimulate the growth of local businesses, including restaurants and shops, and other service providers.
- 4.20 In summary, there are clear economic benefits which should be afforded significant weight in the determination of the planning application.

## 5 Environmental Benefits

#### Context

- 5.1 VSC can be demonstrated, providing the environmental benefits of the Proposed Development are deemed significant enough to outweigh the harm to the Green Belt.
- 5.2 An ornithology non technical summary has been prepared by RPS / Tetra Tech and should be read alongside this Statement. The document demonstrates the technical details of the project in a simplistic and readable form.
- 5.3 Broadwater Lake sits within the Colne Valley Regional Park. The Regional Park was established in 1967 to preserve areas for leisure, recreation and conservation of nature a setting where people can connect with nature and enjoy the outdoors, alongside wildlife. The lake itself is an important wildlife haven, and forms part of the Mid Colne SSSI, primarily providing an important refuse for assemblages of birds year-round (wintering and breeding).
- 5.4 The landscape of the Colne Valley has been transformed over the past century by mechanical large-scale sand and gravel extraction, which continues today. Many of the pits resulting from the extraction have filled with water and now form a series of lakes of varying size. Most of the lakes are used for recreational activities, including angling, sailing and water-skiing. A large local populace means that this wetland landscape is a valuable resource for informal outdoor recreation such as walking, escaping to nature, fishing, bird-watching and general "fresh air in a wild space", to the benefit of the community. The area is very much manmade and sculpted; it is not a virgin site.
- 5.5 The details set out in the planning application demonstrate that there will be no significant impact on the SSSI or on any species or habitats which have been assessed. The technical documents conclude that no significant impacts are concluded and many are flagged as positive outcomes. The revised scheme incorporates greater empathetic design for the SSSI features, while still considering them with great precaution and worst-case scenarios.
- 5.6 The submitted Environmental Impact Statement also concludes that through construction phase, all outcomes are concluded as 'negligible', 'no significant residual effects' through to 'moderate positive'. During the operational phase, the significance of residual effect is concluded to range from 'none' to 'moderate positive'. Cumulatively, the significance of residual effect is deemed to be 'none'.

#### Implementation of appropriate enhancement works

- 5.7 The Site is a largely neglected wildlife site intimated by the lack of a management plan, no regular site condition monitoring and no clear pathway for wider use. The Proposed Development will result in the implementation of appropriate management works, which enhance the conservation value for the area and restores its environmental health.
- 5.8 Several enhancement measures in keeping with the ethos of the wider site are proposed. These will provide positive impacts which result in the Proposed Development having no

significant impact on the SSSI or on any species or habitats which have been assessed. The enhancement measures can be summarised as follows:

- Ecological reinstatement of BSC the area currently occupied by BSC along the north bank of Broadwater Lake will no longer be required to be used by BSC when the Proposed Facility is constructed and operational. This area will be enhanced to increase biodiversity. Measures for enhancement are set out in the MEMP.
- Reduction of disturbance at northwest corner the location of the Proposed Development reduces the disturbance within the north of Broadwater Lake. To enhance the area further, buoys will be placed within the northwest corner which would demark an area of no access. The floating pontoons from BSC will be relocated to this area which is likely to allow breeding turns and / or gulls to make us, as has already been demonstrated at the southeast corner of the site.
- Annual vegetation management of island no. 3 and no. 4 both islands are positioned to the north and centre of Broadwater Lake. Both of these islands are currently heavily vegetated. The vegetation will be cleared in October each year to remove any growth over the summer. This removal of vegetation will enhance these islands to increase the scope of ground nesting gulls and terns. The removed vegetation will be composted.
- Installation of reedbeds in eastern channel floating reedbeds act as an ecological system designed to mimic the functions of a natural wetland while floating on the surface of a body of water. The location of these reedbeds, within the eastern channel is to provide additional habitat for juvenile fish, invertebrates and birds.
- Woodland management to east of Broadwater Lake a small parcel of woodland to the north of Broadwater Farm and west of St Mary's Close will have a woodland management plan produced to increase the biodiversity value of the area.
- Sensory garden and pond on peninsula an accessible wildlife garden with pond dipping pool will be located near to the campsite. This will enhance peoples' experience with nature allowing a hand-on approach to invertebrates and other insects. The wildlife garden will have areas for reptiles (rocky habitat) and insects (insect hotels) as an inspiration of what people can implement in their own gardens.
- Tern rafts funded by HS2 as part of the HS2 works, tern rafts are to be placed within the bird refugee area. These were not in place during the 2025 breeding season.
- Gravel bank within eastern channel some narrow gravel banking will be formed within the eastern channel. This will provide loafing habitat for young duck and gulls, as well as species such as wagtails and potentially waders such as little ringed plover and oystercatcher on occasion. This habitat will also encourage aquatic invertebrates which currently have little shallow water habitat due to the steep sides of Broadwater Lake.
- Habitat creation for breeding birds to increase the number of nesting places for breeding birds, additional tern rafts will be placed within the bird refuge. Alongside the rafts, more floating reedbeds will be installed. The increase in nesting places will enhance the breeding birds assemblage of the site. The increase in nesting habitat will contribute to increasing and maintaining the population, particularly common tern and black-headed gull.

- Native orchard planting within the proposed camping area, orchard trees will be planted which increases the biodiversity of the area. The introduction of suitable fruiting plants would provide new habitat for a range of fauna.
- **Wildlife Pond** within the area designated for camping and woodland activities, a wildlife pond will be installed. This pond will consist of varying depths with aquatic vegetation planting. This pond will be a 'pond-dipping' area with appropriate safety features due to its location.
- Bird hide and information centre a fully enclosed bird hide will be installed on the west of the peninsula overlooking the bird refugee area. This bird hide will have screened walkway so no movement would be detected from the water. The type and size of the bird hide is yet to be confirmed however the hide will be accessible to wheelchair users and will follow the styles from many nature reserves across the UK. Within the bird hide there will be information boards which will help people identify birds, understand how the populations on Broadwater Lake interact with the European flyway and why it's important to conserve these places for birds.
- 5.9 The proposed facility would be owned and managed by LB Hillingdon and an Operational Management Plan would be prepared in partnership with Natural England. This plan would be integral to managing the site and would be secured by a condition of planning permission, requiring approval from Natural England and the London Borough of Hillingdon planning department before the Proposed Development can be operational.

#### Positive disturbance

- 5.10 Not all human activity should be regarded as having a negative impact on birds. Some species disturbance can be positive once they habituated to the stimuli. Some duck species on Broadwater Lake are clearly not impacted by the current activities taking place on the lake or wider site, with the populations on the site trending differently when compared to other sites without development. This is illustrated by bird species on Broadwater Lake mirroring the national trends and not forming trends which have been negatively impacted.
- 5.11 Individual birds present on Broadwater Lake show high levels of habituation, for example, no reaction to the continual noising bagging plant, no reaction to the helicopters / planes from Denham Aerodrome and no reaction to the starting buzzer for sailing.
- 5.12 The disturbance survey<sup>47</sup> showed birds slowly swimming away from the sailing area and into the southwest corner of the lake which is the bird refuge area as part of the Proposed Development which is not a startled response where birds would fly and use up energetic costs. The survey shows that once the sailing activity is finished, birds swim back to deeper areas of the lake which suggests that birds are comfortable using the area with its present activities and have been so for decades.
- 5.13 It has been demonstrated in the surveys undertaken as part of the planning application that some birds do appear to use human activities to their advantage, specifically to avoid predation or increase foraging success. Whilst humans are often perceived as a threat, birds can also perceive them as a shield against other predators, a phenomenon sometimes referred to as

<sup>&</sup>lt;sup>47</sup> Section 6.2 of Appendix 7.6 (Wintering Bird and Disturbance Survey Report) (2025)

- the "scarecrow effect", which is where birds choose to nest near areas with higher human activity, effectively using humans as a deterrent to smaller predators.
- 5.14 Studies<sup>48</sup> have also shown that in some cases, increased human activity, like bird photography or even the presence of humans on trails, can lead to a decrease in nest predation rates. This is potentially because predators may be deterred by the presence of humans, reducing their hunting activity in those areas.
- 5.15 Birds in urban or frequently visited areas may exhibit shorted Flight Initiation Distance the distance at which they flee from a perceived threat compared to their rural counterparts. This could be due to habituation or a perceived lower risk of predation in human-dominated environments. Taking into account, it has been concluded in the planning application that birds have evolved at this site to adjust human activities.

Quod | Very Special Circumstances and Development Benefits Statement | HWSFAC | August 2025

<sup>&</sup>lt;sup>48</sup> Nisbet, 2000 and Beale and Monaghan, 2004

## 6 Conclusion

- 6.1 The Site is Grey Belt land as defined in the NPPF 24 and it meets the definition of appropriate development as set out in Paragraph 154(b). Notwithstanding, , even if the Proposed Development were to be considered as "inappropriate development" in the Green Belt, the harm by reason of inappropriateness, and any other harm resulting from the Proposed Development is very substantially outweighed by other considerations which have been set out in this report in the form of social, economic and environmental benefits.
- 6.2 For the avoidance of any doubt on whether the Proposed Development is acceptable in principle, this Statement has been prepared to demonstrate that there is a very strong VSC case. The benefits correspond with the three pillars of sustainability as set out in the NPPF 24 economic, social and environmental. These benefits should be afforded substantial weight during the determination of the Planning Application.
- 6.3 The social benefits of the Proposed Development can be summarised as follows:
  - Provision of an outdoor activity centre for a wider range of user groups such as schools and education establishments, children, young people and adults with additional needs, guides, scouts and cadets, other educational establishments, BSC members, families and emergency services.
  - Outdoor activity health and wellbeing benefits.
  - The teaching and learning of lifelong skills.
  - Volunteering opportunities.
- 6.4 The economic benefits of the Proposed Development can be summarised as follows:
  - The creation of jobs and apprenticeship opportunities.
  - The creation of transferable skills.
  - Attraction of visitors which many stimulate the growth of local businesses and drive sales in the local and broader economy.
- 6.5 The environmental benefits of the Proposed Development can be summarised as follows:
  - The implementation of appropriate enhancement works.
  - Positive disturbance on species.
- 6.6 The Proposed Development generates several social, economic and environmental benefits which are truly special when combined, resulting in substantial benefits and very special circumstances, in line with the NPPF 24. Substantial weight is given to Green Belt harm, and any other harm as set out in the technical documents submitted with the planning application, however in this case the harm would be clearly outweighed by other considerations, to the extent that they form the very special circumstances necessary to justify development in the Green Belt



# **Appendix 1**

# **Letters of Support**

# **London Borough of Hillingdon**

# Public consultation on Hillingdon Water Sports and Activity Centre Comment/ Feedback Sheet February 2023

Name (Optional)	Zoë
Address (Optional)	
Tel (Optional)	
Email (optional)	
Comments on proposals	HOAC had a hugely positive impact on my life, and I fully support the proposal to relocate to Broadwater Lake so that others in the future can benefit from it too.
	I began attending holiday camps there as a child, and volunteered and worked there into adulthood. HOAC was not only my first place of employment, but it taught me so many practical skills that have come up tin my life since. I still work with young people today, and I think a big part of this has to do with the opportunities HOAC provided me. Working there taught me how to help others, push myself beyond my comfort zone, and teach something practical and valuable.
	It was a wonderful place that gave children, adults and families the chance to engage with nature and learn skills that are hard to acquire being so far from the coast. It created community which is something so lacking in many parts of society today. Bringing back HOAC at the new site will be of huge benefit to the local area and the natural landscape and I really hope this proposal will be approved.



# **London Borough of Hillingdon**

# Public consultation on Hillingdon Water Sports and Activity Centre Comment/ Feedback Sheet February 2023

Name (Optional)	Linda
Address (Optional)	
Tel (Optional)	
Email (optional)	
Comments on proposals	I am unable to attend the pre-planning consultation on 22.02.2023 but would very much like to offer my FULL SUPPORT for the planned HOAC development.  This is a development that has been sorely missed during the HS2 works and as a family we very much look forward to a much loved and needed outdoor activity centre.  HOAC not only benefits individual families but also scouting groups, DofE etc etc.  HOAC is something that Hillingdon Borough should be proud off and I would certainly encourage all Borough Councils to offer something similar for their young people – it promotes good health, fitness & mental wellbeing which are essential for community living.  Good Luck with the application.



# **London Borough of Hillingdon**

# Public consultation on Hillingdon Water Sports and Activity Centre Comment/ Feedback Sheet February 2023

Name (Optional)	Nina
Address (Optional)	
Tel (Optional)	
Email (optional)	
Comments on proposals	I am very pleased to hear that the proposed new HOAC site is due to be located at Broadwater Lake.
	HOAC had a hugely positive impact on me as a child, teenager and young adult. I grew up in Northwood and I learnt to sail at HOAC aged eight. I became a sailing instructor there at 16 years old, and spent the next ten years working at HOAC during the summer holidays and weekends. I even met my partner Ed there, ten years ago, and we're now expecting our first child together.
	I didn't feel like I fitted in at school. HOAC became a real saving grace for me, particularly as a teenager looking for a positive way to spend my weekends - practising sports and making friends. Not only did I learn new skills at HOAC, it provided me with my first workplace, as well as a community where I'd interact with people of all ages - from 8 to 80. There aren't many places that offer this kind of melting pot of ages and backgrounds.
	Environmentally, life flourished at HOAC. The water had plenty of fish, insects like dragonflies, as well as swans and flocks of geese. Preserving the environment was always important. Regular litter picks kept the site very clean. Children were encouraged to be sensitive to resident animals and plant life.
	Growing up in the outskirts of Greater London, it's hard to find places where you can immerse yourself in nature. HOAC was one of these rare places. Through sport, it offered a perfect opportunity for children and young adults to experience the natural world - whether that's feeling the wind on your face while sailing or spotting pike swimming under your kayak.
	When you spend your time practising watersports and land activities outside, it fosters an appreciation for the natural world that stays with you. It certainly has for me. I've no doubt hundreds of children will benefit from this at HOAC's new proposed site at Broadwater Lake.

Name (Optional)	Sara
Address (Optional)	
Tel (Optional)	
Email (optional)	
Comments on proposals	I could not be MORE in favour of any sort of watersport facility being made available to the public.  Before HS2 took away HOAC, my children learnt to paddle board, kayak and sail at the school holiday camps they attended.  Once they knew what they were doing, to end a hot summers day with a session on a paddle board was one of our greatest pleasures.  Additionally my daughters attended the high ropes activities and had and attended many birthday parties at HOAC.  I can't tell you how sad we were to lost HOAC and how much we've missed it. Anything that can be done to replace it should.



Name (Optional)	Alison
Address (Optional)	
Tel (Optional)	
Email (optional)	
Comments on proposals	I support the development of a water sports and activity centre facility at Broadwater lake. HOAC offers a fantastic opportunity for children and young adults to learn land based and water sports and grow in confidence.  All 4 of my children attended holiday courses at the old site. They gained RYA qualifications, made friends and grew in confidence. The experience gained at HOAC taught them important skills and help to build a strong cv when applying for university or work.  We have missed HOAC enormously since it closed.



Name (Optional)	Debbie
Address (Optional)	
Tel (Optional)	
Email (optional)	
Comments on proposals	HOAC has been a part of my family's' life for many years and offers invaluable activities and support to young people.  I fully support this proposal as an alternative to the original site which HOAC were forced to vacate because of HS2.
	Many people have missed HOAC over the last couple of years not just for their activities but also as an employer of young people and key part of the community.



Name (Optional)	
Address (Optional)	
Tel (Optional)	
Email (optional)	
Comments on proposals	It is fantastic that Hillingdon Outdoor Activity Centre is finally being relocated to a new site after its forced closure by HS2. HOAC had been a wonderful facility in the Borough, providing outdoor education for children, people with disabilities and the wider community. It was also a well-respected leisure facility, used by children and adults alike. The Centre had a huge impact on many people's lives, from supporting disadvantaged children to training National competitors. Its closure meant that Hillingdon, and the wider area, had lost amazing services that were not available anywhere else locally. It is important that HOAC is relocated and continues to serve the people of Hillingdon.



# London Borough of Hillingdon Public consultation on Hillingdon Water Sports and Activity Centre Comment/ Feedback Sheet February 2023

Name (Optional)	San + Alli
Address (Optional)	stille and
Tel (Optional)	07786
Email (optional)	
Comments on proposals	Concerns:  ( ) Gate access to stelles from Bouges Pit  2) Bours Pit Road surface:  3) Flooding of land from calant.  4) Constitute treffic  5) Dealgrown of Agreed field  6) Foreig and ask These



HILLINGDON

Name (Optional)	Jane
Address (Optional)	Harefield resident
Tel (Optional)	
Email (optional)	
Comments on proposals	The project seems a great idea as long as there is a minimal impact on the SSSI.  I like the idea of green noves on some buildings and the use of solar energy. Plans to make it accessible for all are also welcomed.  It is a shame that it is a restricted sile, so many residents would access it.  I can underland that this is because dishiving the of it was accessible though.



Name (Optional)  Address (Optional)  Tel (Optional)	SIMON BOUNDEST DRAYTON
Email (optional)	
Comments on proposals	THIS WILL BRING BACK INVACUABLE FACILITIES TO THE BORDEN. WE HAVE A FAMILY WATH SPECIAR NEEDS & DISABILITIES, AND HOAK WAS USED EVERY WEEKEND, NOTABLY WITH THE CHALLENGER CLUB. WE HAVE STRUGGLED TO FIND ANY COMPARABLE FACILITY WHICH DIRECTLY SUPPORTED DISABLED FAMILIES. THE PLANS PROPOSED ARE VERLY ENCOURAGING AND WEZOMED.



DOREEN
Excited about the concepts  + the enhancement it will  bring to a run-down part of  S. Harefield,  Questions (considerations:  Ohow will HS2 operational noise  affect the quality of experience  for service users? Will teaching /  quiet activity be feasible?  O Traffic management at access  from Moorhall Rd - correctly very  danserous.  3 Pedestian connectivity to public  trasport - including accessibility  for people with disabilities?



Name (Optional)	
Address (Optional)	HAREKIEL
Tel (Optional)	
Email (optional)	
Comments on proposals	Positive for the Villace.  While early days could you consider access for individual coming with lat a drop off point.  Dioabled access - probably already considered Dog Friendly - conditions Of being onlead.  out all times  Flowent Jb Social access to cater if poss.  may be time con trolled?



## London Borough of Hillingdon Public consultation on Hillingdon Water Sports and Activity Centre

Comment/	Feedback	Sheet	<b>February</b>	2023
Comment	I CCGBGGK	011001	. obladij	

Name (Optional)	BERNIE
Address (Optional)	HARFFIELD
Tel (Optional)	
Email (optional)	
Comments on proposals	Very velcome. It will benifit a lot of people especially families.



Name (Optional)	Steve 1
Address (Optional)	
Tel (Optional)	07973
Email (optional)	
Comments on proposals	good mihal plan. good we of old disused land. The old bload was a great pacifily for local group and clubs.  Although some may have concerns with regard to wild life + access. I feel the benefit to young and people with disabilities our weighs peoples concerns. Hote worked with young people and promoted a love of nature and wild life.



Name (Optional)	GRAENE
Address (Optional)	
Tel (Optional)	MAREFIELD 07765
Email (optional)	
Comments on proposals	This is an excellent proposal, providing owntoor lessure activities and using head which is currently under-atilised. I like the way it has a bland of council provided but privately run. I look Jaward to skeing kinds or adults using them Jacilites to the maximum. There is no shirtage of wild nature areas else where in the Colne Valley.



Name (Optional)	Hichael Hichael
Address (Optional)	
Tel (Optional)	O*+86
Email (optional)	IClang. COW
Comments on proposals	- I City Support The ProPosal, Hillingdon Last a well respected Part og The Commenty, which needs to Be Rebuilt facilities need to Be larger TO support everyone on site-  I would like to see This happen as quickly as Possible.



Name (Optional)	Joanna de la
Address (Optional)	
Tel (Optional)	079040
Email (optional)	g Mail, Cott
proposals	- Overall a great Idea which could read to a fairt which facility.  But  Not enough poulsons there were 5 at the Old Hofe and 2 plus beach areas 4 totalat  Broadwater  Shallow areas need to be dreged Marc it is very shallow despite it being surveyed it is not deep enough



Name (Optional)	Susan & John The
Address (Optional)	NOAL wood.
Tel (Optional)	
Email (optional)	Dogmail lon
Comments on proposals	Fabrious proposal.  Please hung up! There are  so many children, adults and  Vunerable people who are missing  out.



Name (Optional)	Tiva
Address (Optional)	HARGEIELD. UBG bLN
Tel (Optional)	07710
Email (optional)	Janual Com
Comments on proposals	
	1 thinks this schoone is
	1 thinks this eclosure is



Name (Optional)	John, Jackie
Address (Optional)	UB9 6HF
Tel (Optional)	
Email (optional)	er.co.uk
Comments on proposals	We are supportive of the
	proposals - in the past regular
	uses of HOAC/HJCC
	It is important for the young people
	(as well as other generations)
	of Hillingdon/Harcfield that this
	goes ahead as soon as possible.



### London Borough of Hillingdon Public consultation on Hillingdon Water Sports and Activity Centre

Comment/ Feedback Sheet February 2023

Name (Optional)	PAUL
Address (Optional)	Hillingdon Junior Canoe Club
Tel (Optional)	
Email (optional)	chairman@ hjcc.org.ok.
Comments on proposals	Very Supportine Please remember we need an equivalent of our "green shed" in An independent canon (kayak store. — seperally lockable.



Name (Optional)	
Address (Optional)	
Tel (Optional)	
Email (optional)	
-Comments-on- proposals	This looks great!  Particularly like the idea of giving young people of all backgrounds and abilities the opportunity to learn to sail etc. Which III give them confidence and enjoyment of the outdoors.



Name (Optional)  Address (Optional)	David Dakugton Ave Amersham
Tel (Optional)	01494
Email (optional)	
Comments on proposals	Can't wait to see it get underway & open. A lot of people home missed the facility no end.



Name (Optional)	BRANGE
Address (Optional)	CHALFORT SS CAUSS HAS 4JW
Tel (Optional)	077168
Email (optional)	Thotmail.com.
Comments on proposals	O OVERAL A GOOD DEA.  (3) CONCERN OUTS MAKAGETIENT  OF THE WANTS ACTIVITY SPACE  BELING FATHER MANT PARTIES.  (3) CONCERN OUTS BRONDWARS  SAILING CLUB BUILDING OUTGOOD  HOT BEING UP THE LAVE.  (4) DINGHY PARK FAR END A LONG  WAY FROM SUPWATS.  (5) DEPTH OF WANTS HAT  RESTRICT ACTUITES DURING  "DRY MONINGS.



Name (Optional)	
(opnensi)	Karen
Address (Optional)	
	Bread water SC.
Tel (Optional)	
Empit (antique)	
Email (optional)	
Comments on	-con.
proposals	Vens happy generally ~ use to use
	Very happy generally ~ used to use HOAC + took learning disability clients
	Carrie of the control
	camping there
	Some concerns about shared use of the
	water aurtailing our club activities,
	events & views up the lake
	Good idea to improve / develop the
	que la conficie per la constante de la constan
	SSSI/nature part of the lake even if it
	does to be moved a bit?



Name (Optional)	Traa ===
Address (Optional)	Hillington
Tel (Optional)	
Email (optional)	g-mail-com
Comments on proposals	Great to see Horse will get a good new site, to open in 2024!



Name (Optional)	Craham
Address (Optional)	(Hillingdon)
Tel (Optional)	07973
Email (optional)	-figi
Comments on proposals	I fully support this.  As a sea-scout skills instructor  - watersporks  - Rock climbing  I would appreciate being  consulted on access, facilities  and equipment.



# London Borough of Hillingdon Public consultation on Hillingdon Water Sports and Activity Centre Comment/ Feedback Sheet February 2023

Name (Optional)  Address (Optional)  Tel (Optional)  Email (optional)	OTERS TO TOTAL TOT
Comments on proposals	Good to see some progress. Urgency needs to be wheeled to get Dus done Hillungdy Needs HOAC NOW!



Name (Optional)	
rame (optional)	Bernie 3.
Address (Optional)	Closp
	Dekenham UBIO 8 JR
Tel (Optional)	07949
Email (optional)	Co.uk.
Comments on proposals	Good to see some
	progress:
	1) (not forward to seeing
	I look forward to seeing it open in 2024 (AP)



Name (Optional)	NIKKI COMPANIENTE
Address (Optional)	
Tel (Optional)	
Email (optional)	2 gnail com
Comments on proposals	Glad to see something finally in place for H.O.A.C. would be good to see some plans of the new facility.



# London Borough of Hillingdon Public consultation on Hillingdon Water Sports and Activity Centre Comment/ Feedback Sheet February 2023

Name (Optional)	Kaye
Address (Optional)	
Tel (Optional)	
Email (optional)	Com
Comments on proposals	Plans look promising. Hopefully it work take too long before plenning permission can be granted.



Name (Optional)	Graham Tos
Address (Optional)	
Tel (Optional)	
Email (optional)	outlook-com
Comments on proposals	Brilliant!  Please press on and get this done- It's been a long wait.



Name (Optional)	Mike The
Address (Optional)	
Tel (Optional)	
Email (optional)	bul. co. ok
Comments on	0 100 1 100
proposals	fantastic proposal. Will enhance the sailing plactivities in the area and swill improve disabled activity facilities no end.



lle

# London Borough of Hillingdon Public consultation on Hillingdon Water Sports and Activity Centre Comment/ Feedback Sheet February 2023

Name (Optional)	STINS
Address (Optional)	WD3 SNY
Tel (Optional)	07856
Email (optional)	GMAIL-COM
Comments on proposals	VERY POSITIVE,  CURRENTLY THIS AREA IS NECESTED  AND NEEDS CAREFUL DONORDOMONE.  THE NOTWARL RESOURCES SHOWED  BOUSFIT AS LUCK AS THE  SAILING COURT, HEAC AND ALL  OTHER USERS.



Name (Optional)	NICK
Address (Optional)	DRIVE HAREFIELD
Tel (Optional)	01895
Email (optional)	
Comments on	
proposals	Toppens! Seems an exellent scheme.
	Scheme.



### Public consultation on Hillingdon Water Sports and Activity Centre Comment/ Feedback Sheet February 2023

Name (Optional)	LAURA
Address (Optional)	GREAT MISSENDEN, BUCKS HP16 ODS
Tel (Optional)	07817
Email (optional)	- Jamail. Com
Comments on	HOAC and its dedicated staff shaped my Jon's
proposals	life from age of 8 years when he did his first  RYA hear to Sail lowse.  He joined the inexpensive weekly term' pico chies  which were 3 hours at the weekend April - Oct.  HOAC's Mentoring/Volunteer scheme for layer sla  teenages ignited a prosion for all waterports  he still has friendships now from the 2 week Enstert  I week May during year 9) where he experienced  everything HOAC had to offer.  Their was followed by volunteering in holidays,  Then and iffing as RYA instrutor in Sailing at  aged I breas and Then working his GAP year at HOAC  For someone who has weless at school team  sports, super academic this gave him confidence  begoind anything - he loved to teach, he loved  to stare his love of waterports.
	He has borked is other waterport centres

passionate teacher, that were fun and able to teach.

Thank you to HOAC my son has left uni and he', still on the water - think tingdon.gov. uk

The Chribean working on SuperSaults.

## There your proposal. Please ensure:

- · Costs of courses are affordable
- Continue to provide non-profit making mentoring lowses for 14 year ald to your volunteering program getting bogs and girls interested in watersports at this tricky age.
- · provide fit for purposé cabins sor onsité staff accommodation.
- · Provide good educational progression weres for your staff to help them progress.
- . Make sure from is included and control to the style of teaching and that courses are tanget by experts in that field.
- · Could holiday camp courses be partly funded for children from homes on love incomes?

Thank you to all the HDAC staff That supported Chis from 2014 ~ 2019 particularly - he loved working there and I hope other young people get the opportunity to thrive by just loving being on the water.

Name (Optional)	ALAN e DEBBIE 7
Address (Optional)	Road, Denham
Tel (Optional)	
Email (optional)	PAOL.Com
Comments on proposals	Whilst we have no offection to the relocation of HOAC to Broadwater lake our main Concern or the uncneared John of traffic on an already bush toad. We can under Bucks Council and one Seeing major developments with the widered place being 3rd to Haffat Havelield and HS2.

