

Our ref: AF/CW/Q220379
Your ref: 2382/APP/2023/2906
Email: angie.fenton@quod.com
Date: 26th March 2026



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

For the attention of Michael Brigginsshaw

Dear Michael,

Planning Application Reference 2382/APP/2023/2906
Broadwater Lake, Moorhall Road, Harefield, UB9 6PE
Applicant response to Petition

We write on behalf of the London Borough of Hillingdon (LBH) ('the Applicant'), in response to the petitions dated 2023 and 2025 from club members at Broadwater Sailing Club (BSC), and issued to Quod on 17 March 2026.

It is important to note that a letter of support has been received from the main committee of Broadwater Sailing Club (BSC), which is the formal response of the club. The petitions were signed by individual members in a personal capacity. Furthermore, we understand that in the event that the planning application is refused, the landowner intends to continue with vacant possession of the Site which means that BSC will be unable to continue to occupy this site, notwithstanding whether planning permission is granted or not.

1 2023 Petition

The petition raises several concerns relating to the impact of the proposed development on the Mid Colne Valley Site of Special Scientific Interest (SSSI).

- **Wildlife as a priority user for Broadwater Lake** – Broadwater Lake has been used for sailing since it was excavated, with a total of 33.3 hectares being actively sailed, and most of the shoreline being fished. Only a small area, measuring at 3.42 hectares has ever been completely disturbed. The proposed development will result in the sailing area reducing to 29.46 hectares and fishing activities limited to the east shoreline. As a result, 13.72 hectares in the south-west of the lake will be completely undisturbed and 100% dedicated to birds. This is the most valuable part of the lake for birds. This area will also be enhanced, with works to improve shoreline habitat, and by provision of floating nesting platforms and floating wetland habitats, creating benefits for breeding birds.



- **Valuable habitat** – During the months of September to March, the new facility will not be operational, with only BSC continuing its low level of activities.
- **Impact of dredging and construction activities** – Dredging will only occur within a small area in the east of the site and only for a short time. The area (east channel) is screened from the rest of the lake by mature trees and islands. Visual impacts to birds using the main body of the lake will be minimal, and there will be no disturbance at all to any birds using the south-west corner. It has been agreed with Natural England to undertake in-lake dredging during the months of October to December. This avoids the months when wintering bird numbers are at their peak and food is scarcest and also avoids the moulting season when ducks are very vulnerable.
- **European Eel** – The Applicant acknowledges that Broadwater Lake supports a population of European eel with large specimens over 5lbs reported for many years. At the request of the Environment Agency, a European Eel Management Plan will be produced for the lake, to ensure the conservation status of this species remains favourable throughout the construction and operational phase (50+ years). During construction, only a small area of the lake bed will be dredged, and dredging will only occur when the water temperature is above 10°C - ensuring eels will be active and able to swim away. The best area for eels (the south-west) will not be dredged. Artificial caves and fish reefs will be provided within the lake to provide better refuges and support population growth, providing benefits to this species.
- **Release of stored nutrients from dredging** – Broadwater Lake is a former sand and gravel pit and is entirely artificial. Although there is a thin layer (30cm) of organic matter at the surface of the lake bed, beneath this is sand and gravel which has a very low / negligible organic content. Only a relatively small and localised area of the lake will be dredged (the east channel). Measures (such as silt curtains) will be put into place to prevent disturbed sediment from spreading widely, and the works will be done during late autumn when water temperatures are cooler, so there will not be any chance of algal blooms. The dredging will be done over a short period of time, and any residual sediment will quickly settle once works are completed.
- **Annual severe blooms of blue-green algae** - Although algal blooms do occur most summers at the lake when water temperatures are high and water levels are low, these have not been noted (2022 – 2025) to comprise blue-green algae (toxic to birds and other animals as well as to humans), but more common non-toxic forms. Despite this, there is always the chance that blue-green algal blooms may occur, and this likelihood will worsen as climate change-related warming continues to occur over the next 25 years. The floating wetland habitats provided by the development will actively remove nutrients from the lake water, reducing the nutrient status of the lake, and reducing the likelihood of these blooms occurring. Many of these will be deployed down the east channel and east side of the lake, where the water nutrient content has been recorded to be higher than in other parts of the lake. This may be due to nutrient-rich water entering the lake from the Grand Union canal. The source of these nutrient-rich inputs will be investigated and if viable a reedbed filtration



system will be constructed as part of a Lake Enhancement Plan, which has been requested by the Environment Agency. This plan will form part of the Mitigation and Ecological Management Plan.

2 2025 Petition

The petition raises several concerns relating to the relocation of BSC to the proposed HWSFAC.

- **Safety** - Operational visibility is provided from the first-floor viewing platform, the operations room and from the race hut at the northern point of the peninsula. Selective pruning of tree canopies will optimise sightlines across the lake. Uninterrupted shore-based visibility is not essential to safe sailing operations. Notwithstanding, the proposed layout does not present a fundamental safety constraint. Standard safety measures will be imposed such as safety boats on water, radio communications, qualified staff, defined operating zones and formal risk assessments and operating procedures. These measures are standard practice and reduce residual risk to a very low and acceptable level.
- **Wind Conditions** - The development was designed with input from the RYA, who support the development. There may be some limited wind shadows at times in the eastern channel, however this represents a small proportion of the overall sailing area and the conditions in any affected zone will remain sailable. Sheltered conditions adjacent to the jetty and rigging area can be operationally beneficial, particularly from launching, recovery and training facilities. The majority of inland sailing environments involve a level of compromise due to trees, banks, buildings or landform and there are numerous well-established sailing centres which are operating with equal or significantly more constrained conditions. In this context, the conditions at the Site are entirely typical of inland sailing venues and within acceptable operational parameters.
- **Reduced sailing area** - The existing approved sailing area is 36.2 hectares with an effective sailing area is currently 25.1 hectares. The proposed development results in a minor reduction to the sailing area to 24.2 hectares (3.7%).
- **Reduced storage area and facilities for BSC** - A significant number of boats stored on the bank appear to be in long-term storage. More than adequate capacity is provided for the intended sailing activities and the proposed layout incorporates multiple jetties, slipway and defined rigging zones. These aspects of the proposed development have been developed to maximise functional efficiency within the available footprint. The clubhouse will result in a significant uplift in space with modern facilities including a dedicated crew room, kitchen, improved hygiene facilities etc.
- **Insufficient car parking** - The proposed parking levels comply with the standards set out in the London Plan (2021) and the London Borough of Hillingdon Local Plan Part 1 (2021). The car parking proposed is supported by TfL and LBH highways.



- **BSC safety boat and equipment storage** – this is a matter to be dealt with in the Operational Management Plan which BSC members will contribute to. There will be a safety boat and equipment storage.
- **Increase in noise and activity within the SSSI** – Natural England, as the statutory body for protecting the natural environment, has no objection to the development, subject to appropriate mitigation. The Environmental Statement sets out the mitigation measures proposed to ensure that the SSSI is not affected during the construction and operational phases. The proposed development has been designed to minimise noise and visual disturbance to the SSSI and birds as far as possible, for example by creating a Bird Refuge Area and confining water-based activities (other than sailing and windsurfing) to the Eastern Channel. During winter, only BSC will operate using the new launch area at the Peninsula. Willow screening is predicted to reduce the visual disturbance effects of these existing activities in the Bird Refuge Area. This is considered to be a Minor positive effect for wintering birds. In short, the ES demonstrates that, with mitigation in place, the proposals will not result in adverse effects on the integrity of the SSSI and comply with national policy tests for development affecting designated sites.

I trust that this provides you with a useful response to the points made in the petition, but please do let me know if you'd like to discuss the above points in any further detail.

Yours faithfully,

Angie Fenton
Senior Director

enc.

cc.