

09 JAN 2026

PLANNING APPLICATION COMMENT

Application: 2382/APP/2023/2906
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For or Against: COMMENT

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Introduction

This document is submitted by the Broadwater Sailing Club Trustees and Main Committee as **Comments** on the London Borough of Hillingdon Planning Application Reference: 2382/APP/2023/2906.

Overview

Detailed in the following sections are the concerns the Broadwater Sailing Club (BSC) Trustees and Main Committee have regarding the revised planning application described above. These primarily centre around four key themes outlined as follows:

1. Omission of BSC from the revised planning application proposal description (dated 21/11/2025) and other supporting documents and poor definition of BSC access rights and space within the proposed development.
2. Loss of a strong and vibrant, growing and active sailing club that provides a variety of activities to sailors and families, if the proposed facility doesn't match or improve the existing location and sailing area.
3. Specific concerns regarding safety, sight lines, degradation of the sailing area and poor storage facilities for club members boats and difficult access to the water and sailing area and the reduced sailing area.
4. Alternative options for Broadwater Lake, BSC and HOAC activities.

BSC were supportive of the initial development proposal (October 2023) that had the vision of being a world-class water sports activity centre, unfortunately the revised and heavily compromised development proposal don't offer this. In this submission, we have presented details of our concerns and alternative solutions that we think provide better value for the tax payer, preserve the ethos of BSC and activity levels of the club and provide a solution to the relocation of the HOAC centre.

We thank you for your consideration in this matter.

1. Omission of BSC from sections of the Revised Planning Application Description and supporting Documents

The revised Planning Application Proposal Description (dated 21/11/2025) states:

'Redevelopment of the site to create the Hillingdon Water Sports Facility and Activity Centre (HWSF&AC) including demolition of existing Broadwater Lake Sailing Club (BSC) clubhouse at the north of the lake and erection of a building including changing facilities, meeting rooms, storage, Workshop and seasonal worker accommodation (sui generis), activity shelters; installation of pontoons and concrete slipways; boat shed; equipment storage huts (north of lake and at entrance); boat parking and racking areas; camping area; outdoor activity areas; ecological enhancement throughout the site; new pedestrian routes through the peninsula; landscaping including new woodland, dense vegetation screens and boundary treatment; new access and access road; localised dredging and land reclamation; relocation of existing sailing area and creation of floating and fixed islands within the lake; coach drop off and turning area; vehicle parking; cycle parking; and associated works

The Superseded Planning Application Proposal Description (dated 6/10/2023) included the wording '....and erection of a building to be occupied by HOAC and BSC including changing facilities....'

Why has the Planning Proposal Description changed to exclude the wording '.....to be occupied by HOAC and BSC....' (highlighted in yellow above) with specific concern over the omission of BSC?

In several places in the supporting documentation e.g. in the Planning Statement, it is clearly stated that Broadwater Lake '...is currently used by BSC who operate from a clubhouse at the northern part of the site.' (*Planning Statement paragraph 4.5*) that 'BSC – who currently operate from the northern part of Broadwater Lake – would also use the Proposed Development....' (*Planning Statement paragraph 8.2*), that the Proposed Operations will 'Maintain existing Broadwater Club uses' (*Planning Statement Paragraph 9.1*).

Why does the Planning Statement Summary and Conclusions (*paragraph 14*) not state that Broadwater Sailing Club will also use the Proposed Development?

2. Threat to a Vibrant and Active Existing Sailing Club - Current Broadwater Sailing Club Activities

With BSC continuing to operate as a sailing club on Broadwater Lake stated in several of the supporting documents, although for some reason omitted from the Planning Proposal Description and Planning Statement Conclusion, here is a list of the current BSC activities:

- Formed in 1972 the club relocated from the southern end of the lake to its current location at the north end of the lake in 1986 (*see Planning Permission 2382Z/86/1291 for 'Relocation of Sailing Club shore facilities involving erection of Clubhouse and dinghy enclosure with associated car parking and access road at north end of the lake' – Applied*

for 14/7/86 and Granted 4/11/86. Then Planning Permission 2382Y/86/739 for 'Continued use of the lake for sailing' – Applied for 18/4/1986 was granted 4/11/1986)

- The Club which is Affiliated to the RYA is a club open to everyone who enjoys sailing, from a novice to expert, with a social membership for people who just enjoy being adjacent to the water
- The membership totals in excess of 200 adult members and with spouses and children, including the Junior Section, the number of persons able to access the site is closer to 500
- The Planning Permission granted to the Club allows for sailing 365 days a year from an hour after Sunrise to an hour before Sunset
- The club encourages the use of member owned boats but has several boats available 'Free of Charge' for members to use. These include a Laser 2000, Wanderer, RS Vison and several Laser Ones.
- The club has a vibrant Junior Section, when for a small fee (£50.00 per annum), a child accompanied a parent or guardian can attend all the Junior sessions from April to October on a Saturday afternoon and learn to sail in club provided Optimists, Toppers, RS Terras, RS Fevas and Laser Ones. The instruction is given free of charge by volunteers from the membership who hold or have held RYA Dinghy Instructor qualifications
- The Club has regular racing throughout the year on Sunday mornings (Two races – One Pursuit and one Handicap) as well as Wednesday Evenings (Pursuit) during the summer months and Wednesday mornings (Pursuit) during the winter months followed by a lunch in the clubhouse or the outside patio area
- The average number of boats entering each race is 20 plus
- During racing the club runs Safety Boats (14ft Dory with 25hp outboard and 13ft Rigiflex 400 with 10hp outboard) with all drivers qualified to at least RYA Powerboat Level 2 or higher as well as First Aid Qualification. The boats are equipped to the standard of RYA Safety Boat requirement
- The club has two further 12ft Rigiflex 360 with 6hp outboards which are used for general purposes especially the instruction of the Juniors. All helms qualified to be at least RYA Powerboat level 2
- The club has a 10hp diesel launch that is converted for use as Committee Boat for the running of the race activities
- The club runs at least four 'Open' Meetings a year for the RS Aero, Phantom, Merlin, Solo and Enterprise Class Associations which are always well attended and reported in the national Yachting Press and are renowned for the sailing and catering prior to racing and at lunch time
- The club allows its facilities to be used by associations such as Scouts and Cubs from various troops for water activities and camping. These facilities are offered to the community 'Free of Charge' and are supported by members of the club during the 'on water' activities
- The club holds several social activities within the Clubhouse throughout the year including 'Fitting Out' Supper, 'Laying Up' Supper, 'Christmas Nibbles' and special occasions such as the club's various Anniversary Celebrations.

- The Junior section has a 'Fun Week' activity at the end of July when the children predominantly play water-based games and this is always followed by a BBQ allowing the involvement of parents, guardians and other family members
- The club provides coffee and tea at all times as part of its membership cost and has a wheeled charcoal BBQ in a specific enclosure for use by any club members (they just provide the food)
- The club has parking for approximately 240 boats and trailers with easy access to the water via three concrete slipways and adjacent pontoons
- In front of the Clubhouse there is ample room for the safe rigging of boats prior to launching
- The club has a battery powered winch charged by solar panels for use by all (if necessary) to launch or recover a boat
- The club has parking facilities for at least forty-five cars plus an overflow carpark for another 40 cars.
- The Clubhouse provides a wet and dry area of approximately 60 square metres, a fully equipped kitchen and galley (10m²), separate Male and Female Changing Rooms each containing two WC cubicles, wash hand basin and a shower enclosure. A Gas fired boiler provides hot water for the kitchen and Changing Rooms. Heating of the Clubhouse is by electric convector heaters. Water is obtained from a pumped deep well and is passed through various filters including Ultra Violet and tested at regular intervals. Although not fully compliant with Part M of the Building Regulations the Clubhouse has been adapted to provide disabled access which is used on a regular basis.
- There is a separate Portacabin providing additional Changing facilities, fully equipped with a WC cubicle, wash hand basin and shower enclosure that can be used by either male, female or Junior's dependent upon requirement. Within this unit there is a store for buoyancy aids and wetsuits for use by the Junior section free of charge.
- There is an outside covered patio area (50m²) with picnic tables and a viewing veranda to the front of the Clubhouse
- The club has five 20ft shipping containers, two of which contain the Safety Boats, one contains domestic machinery for use by club members to maintain their boat berths, one contains the rigging for the Junior boats (all set up on racks) and one containing industrial style equipment to maintain the general areas keeping it at a standard suitable for all including the wild life
- When permitted the club maintained (within the correct seasonal period) the two nearest islands to the clubhouse which allows the bird life to access the island as natural habitat
- The club hosts Charitable events throughout the year and has raised monies for St Luke's Hospice, RNLI, British Legion and the Sailing Charity 'Bart's Bash' amongst others
- The club has welcomed and enjoyed such groups as the Northwood U3A Ukulele band and the rock group 'Rock Bottom' providing entertainment for social events

Broadwater SC can only be described as a strong and vibrant club, fully supported by an increasing membership with clubhouse, boat park, launching area and pontoons that are fit for purpose. The club is well financed with good cash reserves to support ongoing maintenance and carefully planned and managed facility improvements. BSC is open to residents of the London Borough of Hillingdon and the surrounding area, and has a strong community ethos generated and supported by the membership. A General Overview of the Club and its facilities was submitted to the Applicant's Agent but this information for some reason has **NOT** been included in the Amended Planning Application and is therefore documented above.

It is therefore assumed that all of the current Broadwater SC activities detailed in the above will continue at the Proposed HWSF&AC Planning Application Ref # 2382/APP/2023/2906 should planning approval be granted.

3. Specific Concerns

The Broadwater SC Trustees and Main Committee have the following specific comments and concerns on Planning Application Reference # 2382/APP/2023/2906 for redevelopment Broadwater Lake to create The Hillingdon Water Sports Facility and Activity Centre (HWSF&AC) to be located at the southern end of Broadwater Lake on the land referred to as 'the peninsular'

A) Sailing & Safety Concerns:

1. **Safety Sight lines:** The proposed layout offers poor visibility from the shore to the main sailing area. This makes it impossible to provide secondary safety cover from the clubhouse/launch area, creating a significant safety risk.
2. **Junior Training:** The lack of sight lines and the distance to the sailing area make the instruction and safety monitoring of junior sailors impractical without excessive additional staff and equipment.
3. **Wind Obstruction:** The existing and proposed tree and willow planting will create significant wind shadows across the Eastern Channel and southern sailing area. This will severely degrade sailing conditions, particularly in the prevailing South-Westerly winds.
4. **Reduced Sailing Area:** The proposed sailing area represents a reduction in available water compared to the current sailing area as detailed in the current lease & planning permissions, reducing the capacity for racing and training. The sailing area calculation in the supporting documents are incorrect as it shows the area of shallows around the main island as being useable, which is incorrect unless this area is dredged as it is not deep enough to support dinghy sailing. The row of trees across the southern end of the sailing area significantly the current BSC lease area and this is addition to the loss of the bay at the north west end of the lake. This sailing area reduction is not offset by the water area in the Eastern Channel. The Eastern Channel is also a transit water to the sailing area and therefore should not be included in the sailing area calculation.

B) Facility & Operational Issues:

1. **Inadequate Storage and Rigging/Launching areas:** The plans show a significant reduction in storage for members' boats, trolleys and road trailers, which is essential for the club's daily operation. Rigging and Launching areas are also reduced.
2. **Building Footprint:** The proposed but not clearly detailed Broadwater SC facilities are significantly smaller than the current Broadwater SC Clubhouse area, with inadequate crew room space designated for BSC. There are also no designated changing rooms for BSC members use, only shared facilities which may result in safeguarding issues.
3. **Logistics & Access:** The distance from the car park to the main building and the unsuitable unloading area will make transporting heavy sailing gear difficult for members, particularly those with limited mobility.
4. **Car Parking:** The proposed parking capacity is insufficient for peak times, which will lead to congestion and access issues.

C) General Objections:

1. **Impact on Viability:** The combined impact of compromised sailing and reduced facilities poses a direct threat to the club's ability to retain members and remain financially viable.
2. **Waste of Resources:** The current Broadwater SC site is perfectly suitable for continued use. We have a recent survey completed by a Chartered Surveyor that confirms the current BSC Clubhouse is fit for purpose with relatively minor works required to maintain. We also have written confirmation from Cadent that 'does not currently see any issues with the site in relation to the safety of the gas pipeline'. The Planning Proposal represents an unnecessary expenditure of taxpayer funds when existing facilities (such as the former HOAC site) remain available.
3. **Loss of Amenity:** The loss of the south-facing social area and the unique independent ethos of the club will negatively impact the community spirit that has sustained this club for years.

4. Alternative Proposal for Broadwater Lake

The Environmental Statement Non-Technical Summary has a section titled 'What alternatives were considered within the Site' which states:

'The Applicant considered the BSC and proposed facility both operating at Broadwater Lake, but from separate locations. The alternative was discounted in favour of co-locating the proposed facility and BSC as it would significantly increase disturbance effects during the breeding season and limit the ability to mitigate such effects.'

This should be re-considered as leaving Broadwater Sailing Club in its current location would have the following benefits:

- a) There would be less disturbance at the proposed development, which is adjacent to the bird sanctuary, if BSC activities remain at the northern end of the lake
- b) The proposed development for a Hillingdon Water Sports Facility and Activity Centre can then be justified in its own right, with the facility operation independent of Broadwater SC activities
- c) The proposed facility would be able to manage any child or vulnerable person safe guarding concerns
- d) There would be sufficient facility space for the proposed HWSF&AC
- e) Demolition costs for the existing Broadwater SC facility would not be incurred
- f) The existing BSC facility already supports wildlife use with birds regularly using the grass rigging area, walkways between boats and the existing pontoons for feeding and roosting.
- g) If Hillingdon Council were still to buy the lake and provide a lease for BSC with a reasonable break clause, funding grants would be applied for to implement any required facility improvements
- h) BSC would fully support and be part of any Broadwater Lake Management Committee working in conjunction with other stakeholders

Alternative for HOAC to return to previous Dewes Lane site leaving Broadwater SC in its current location at Broadwater Lake

The return of HOAC to its previous Dewes Lane facility should also be reconsidered for the following reasons:

- a) It is understood that land could be made available south of the HS2 viaduct to the railway line to London to support HOAC outdoor activities
- b) The lake remaining after construction of the HS2 viaduct is sufficiently large to support HOAC water sports activities
- c) Any concern over train noise affecting children with ADHD could be mitigated, e.g. by the wearing of hearing protectors which other training centres do
- d) Funds available for the renovation and re-equipping of HOAC at Dewes Lane
- e) Some of the infrastructure built by HS2/Align e.g. the access road, buildings and car-park could be utilised and/or repurposed for HOAC
- f) Avoids the expenditure of public money on a new facility at Broadwater Lake and the difficulties of building and operating in a SSSI of national importance

A petition has been raised by a Broadwater SC member who is a London Borough of Hillingdon with the request to 'To leave Broadwater Sailing Club (BSC) in its current location when considering Planning Application 2382/APP/2023/2906 (Amended November 2025)'. This represents the overall feeling of Broadwater SC members, although signatories have been restricted as required to residents of the London Borough of Hillingdon.

Conclusion

Broadwater Sailing Club have cooperated closely with HOAC in previous years and the Broadwater Sailing Club Trustees and Main Committee agree with the need to find a location for HOAC, or a similar operator, to run a Water Sports Facility and Activity Centre for the benefit of the children and residents of the London Borough of Hillingdon and surrounding areas. The questions and comments in this Planning Application response have been discussed and agreed by the Broadwater SC Trustees and Main Committee and have also been discussed with BSC membership. Our overall response is to provide **COMMENTS** on the Planning Application as a key stakeholder and request a further and more detailed review of alternatives for the proposed development at Broadwater Lake.

Submitted by Broadwater Sailing Club Trustees and Main Committee

8th January 2026