

# 1 Introduction

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## 1.1 Purpose

- 1.1.1 This Environmental Statement (ES) was prepared by Quod and a team of technical specialists and accompanies a detailed planning application. It is submitted to the London Borough of Hillingdon (LBH) as the local planning authority in relation to development proposals known as the Hillingdon Water Sports Facility and Activity Centre (HWSFAC) at Broadwater Lake, Moorhall Road, Harefield, Uxbridge, UB9 6PE (the 'Site'). The London Borough of Hillingdon are also the applicant for the planning application (the 'Applicant'). The majority of the Site is located within the Mid-Colne Valley Site of Special Scientific Interest (SSSI).
- 1.1.2 This ES reports the findings of an Environmental Impact Assessment (EIA) process and provides the necessary environmental information to inform the decision making process for the planning application. The ES describes the proposals and the alternatives that were considered, reports the likely significant environmental effects of the proposed development during its construction and operation, and sets out mitigation and monitoring measures.
- 1.1.3 The Site of the Proposed Development is located in LBH, approximately 5km north of Uxbridge town is adjacent to South Harefield village on the south-east boundary. The Site extends to 79.95 hectares (ha). The Site location is shown in Figure 1.1. A description of the Site and its surrounds, together with a figure showing the planning application boundary are provided in Chapter 2: Site and Setting of this ES.

## 1.2 Overview of the Development

- 1.2.1 The proposals will comprise a leisure-led development which will provide a facility for water-based activities including sailing, rowing, kayaking, and land-based activities such as camping and high ropes, together with supporting buildings and structures. The proposals have been designed to accommodate the Hillingdon Outdoor Activity Centre (HOAC) and Hillingdon Rowing Club at the Site including car and coach parking, access and associated highway works, and will also involve the removal and relocation of the existing Broadwater Sailing Club facilities.
- 1.2.2 The proposed HOAC and Hillingdon Rowing Club activities will operate between 1 April and 31 September.. The existing sailing and angling uses at the Site will continue, although Broadwater Sailing Club would relocate to the new facility. The existing BSC club house in the north of the Site would then be demolished and the area restored for wildlife.
- 1.2.3 The proposed development will involve some works to Broadwater Lake including localised dredging to achieve optimal water depths for sailing and wildlife, works to the lake banks for habitat enhancement, land reclamation to create new islands for wildlife, other enhancement features. An area of land reclamation is also proposed to support the main buildings and structures associated with the HWSFAC. This is to avoid loss of the existing woodland at the Site. The proposals will deliver landscaping and ecological

mitigation and enhancement measures which are also designed to benefit the water environment. The Applicant is committed to the long-term management to conserve and enhance the Site's biodiversity and water environment and further the conservation and enhancement of the special features of the Mid-Colne Valley SSSI. This forms a key part of the proposals.

1.2.4 The proposals are subsequently referred to as the 'Proposed Development'. A full description of the Proposed Development is provided in Chapter 5: Description of the Development. A description of the construction activities involved is provided in Chapter 6: Construction.

1.2.5 The planning application seeks approval for the following development:

*"Redevelopment of the Site to create the Hillingdon Watersports Facility and Activity Centre including demolition of existing Broadwater Lake Sailing Club (BSC) clubhouse at the north of the lake and erection of a building to be occupied by HOAC and BSC including changing facilities, meeting rooms, storage, workshop and seasonal worker accommodation (sui generis), seven activity shelters; three pontoons; two concrete slipways; one boat shed; two 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."*

### 1.3 Background and Need for the Development

1.3.1 The Hillingdon Outdoor Activity Centre (HOAC) is a registered Youth Educational Charity providing outdoor and environmental education for the whole community but with priority given to young people and those who are disadvantaged or disabled. Until recently, HOAC operated at a 45 acre site in Dews Lane, Harefield, Uxbridge, UB9 6JN within LBH. HOAC had more than 40,000 visitors per year, of which the majority were local groups like schools, colleges, community groups and local businesses. The centre provided a large range of land and water based activities and was a valuable community resource.

1.3.2 The HOAC had to close in October 2020 due to the construction of High Speed 2 (HS2) Phase 1, the new high speed rail line connecting London, Birmingham and Crewe. The land required for construction of the HS2 resulted in closure of the lake and it was accepted that HS2 would impair the land based activities of HOAC during the construction period. HS2 also required HOAC to close as there will be no car park and the land area used will be a building site. The HOAC site at Dews Lane is now under full control of HS2. The High Speed Rail (London – West Midlands) Act 2017<sup>1</sup> ("the HS2 Act") includes a legal requirement for HS2 to fund relocation of the HOAC to an alternative site which is suitable for their needs. Further information on the need for the Proposed Development is provided in the Planning Statement which accompanies the planning application.

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<sup>1</sup> <https://www.legislation.gov.uk/ukpga/2017/7/contents/enacted>

- 1.3.3 The Applicant conducted an Alternative Sites Assessment (ASA) for relocation of HOAC to identify whether there are any suitable, deliverable alternatives to the Proposed Development at Broadwater Lake. The Applicant determined that Broadwater Lake was the only available suitable site which meets the needs for an outdoor water sports facility that encompasses all uses that the previous HOAC provided. The ASA is provided as Appendix 4.1 of the ES and a description of the alternatives studied by the Applicant is provided in Chapter 4: Alternatives. The ASA provides the specific recreational criteria, which the Site meets to satisfy HOAC's operational requirements.

## 1.4 Planning Context

- 1.4.1 The Site is located within the administrative area of LBH and is in close proximity to the boundaries of Buckinghamshire Council (adjacent to the west Site boundary) and Three Rivers District Council (TRDC) (adjacent to the northern Site boundary) shown in Figure 1.1.
- 1.4.2 The Site is located within the Mid Colne Valley SSSI. A SSSI is land which is designated for being of special interest because of its flora, fauna, geological or physiographical features, under the Wildlife and Countryside Act (1981). Local planning authorities have a statutory duty (under Section 28G of the Wildlife and Countryside Act) to avoid damage to SSSIs but also to further their conservation and enhancement.
- 1.4.3 National Planning Policy Framework (NPPF)<sup>1</sup> (paragraph 180 (b) provides national policy protection for SSSIs and states that *'Development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted.'* The NPPF (paragraph 180 (B)) also states *"The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the Site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest"*.
- 1.4.4 The Site is located within the Metropolitan Green Belt which is a planning allocation and does not serve to provide environmental protection. Paragraph 144 of NPPF states: *"When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the green belt. 'Very special circumstances' 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."*
- 1.4.5 An Interim Development Order (IDO) Permission (ref: 2382AL/92/464) was granted for the Site in June 1992. This IDO registered an 'Old Mining Permission', dating back to the 1940's and issued by the former Uxbridge Urban District Council, which allowed the working of Broadwater Lake for excavation of minerals and materials. The Old Mining Permissions from the 1940's have been preserved by successive Planning Acts as valid consents but the Planning and Compensation Act 1991 required them to be registered formally in 1992. This IDO remains valid today.
- 1.4.6 Planning permission is in place for the operation of an existing sailing facility (BSC) at the Site, which has a clubhouse and facilities located to the north of Broadwater Lake. Planning permission was renewed on a permanent basis in October 1999 (ref.

2382/AN/99/0609) for the continued use of northern part of the lake for sailing, subject to planning Conditions. Further information on planning history can be found within the Planning Statement which accompanies the planning application.

- 1.4.7 Safeguarding for HS2 is an established part of the planning process to ensure that new developments within safeguarded areas do not conflict with the construction of HS2. Further details of this and existing uses are provided in Chapter 2: Site and Setting.

## **1.5 Environmental Impact Assessment Process**

- 1.5.1 EIA is a process required by UK law for certain types of development projects. The Applicant has submitted a planning application under the Town and Country Planning Act 1990<sup>2</sup>; therefore, the ES was prepared in line with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017<sup>3</sup> (as amended<sup>4</sup>) ('EIA Regulations').
- 1.5.2 Due to the location of the Proposed Development within a "sensitive area" (i.e. land notified under section 28(1) (SSSIs) of The Wildlife and Countryside Act 1981), the Applicant has voluntarily committed to undertake an EIA.
- 1.5.3 A scoping study was undertaken as the first stage of the EIA process to determine the scope of the ES and the general approach to the assessments. The Applicant requested a 'Scoping Opinion' from LBH which was adopted on 19 May 2023 and set out their view of the scope of the ES. Assessments for each environmental discipline scoped into the EIA were then undertaken and an ES was prepared to report the methodology and results of the assessments. Further information on the scope of the ES and the general approach to the EIA is provided in Chapter 3: EIA Methodology.
- 1.5.4 It was agreed with LBH through the EIA Scoping Opinion, that the scope of the ES would include an assessment of Biodiversity, Water Resources and Flood Risk, Ground Conditions and Contamination, and Landscape and Visual Impacts.

## **1.6 Environmental Statement Structure and Content**

- 1.6.1 The ES contains such information referred to in Regulation 18(3)-(5) and Schedule 4 of the EIA Regulations and includes that which is deemed reasonably required to assess the likely significant environmental effects of the Proposed Development. The ES is based on the Scoping Opinion provided by LBH. Chapter 3: EIA Methodology provides details of the scope of the ES, the LBH Scoping Opinion and where information specified in the EIA Regulations can be found within the ES.
- 1.6.2 The ES reports on the existing and future baseline conditions and provides an assessment of the likely environmental effects of the Proposed Development and their significance. In accordance with the EIA Regulations, the ES considers the effects of all stages of the Proposed Development including construction and operation. Assessments are reported in topic-based chapters which also consider the potential for cumulative effects which may arise from the Proposed Development in combination other existing or approved developments. Where adverse effects on the environment are identified, the ES

proposes ways to prevent, reduce and, where possible, offset these effects ('mitigation measures').

## 1.7 ES Structure and Project Team

1.7.1 The project team, authors of ES chapters, and structure of the ES are set out in Table 1.1.

Table 1.1: Consultant Project Team

| Consultant Role / Input  | Organisation  |
|--|---|
| Applicant  | LBH   |
| Project Manager  | Mace  |
| Planning Consultants<br>EIA Co-ordinator   | Quod  |
| Architect  | Space + Place   |
| Civils and Structural Engineers  | Furness Partnership   |
| Landscape Architects   | Colour  |
| Arboriculture  | RSK   |
| Transport and Access   | Robert West   |
| Noise and Vibration  | Noise Consultants Ltd   |
| Air Quality  | Air Quality Consultants Ltd   |
| Flood Risk and Surface Water Drainage  | Weetwood  |
| Heritage   | RPS   |
| Lighting, Energy, Sustainability and Circular Economy  | Syntegra  |
| <i>ES Volume I (ES Chapters)</i>   |   |
| Chapters 1: Introduction<br>Chapter 2: Site and Setting<br>Chapter 3: EIA Methodology<br>Chapter 4: Alternatives<br>Chapter 5: Description of the Development<br>Chapter 6: Construction | Quod  |
| Chapter 7: Biodiversity  | Greengage   |
| Chapter 8: Water Resources and Flood Risk  | John Associates (Weetwood undertook the Flood Risk, Drainage and Sequential Assessment) |
| Chapter 9: Ground Conditions and Contamination   | Hydrogeo (Geo-Integrity provided supporting desk-based studies and site investigation)  |
| Chapter 10: Landscape & Visual Impact  | Colour  |

| Consultant Role / Input   | Organisation |
|---|--------------|
| Assessment  |              |
| Chapter 11: Summary of Mitigation Measures, Monitoring and Residual Effects | Quod         |
| <i>ES Volume II – Appendices</i>  | Various      |
| <i>ES Non-Technical Summary</i>   | Various      |

1.7.2 Regulation 18(5)(a) of the EIA Regulations requires that the ES must be prepared by 'competent experts'.

1.7.3 Quod is the lead editor of this ES and author of certain chapters as identified in Table 1.1. Quod is a member of the Institute of Environmental Management and Assessment (IEMA) EIA Quality Mark Scheme, an accreditation scheme which sets high standards for EIA practice and demonstrates a commitment to excellence in EIA activities.

1.7.4 Each member of the project team is a suitably qualified professional and details of the professional competency of the technical author is provided in each technical chapter (Chapters 7-9 and Volume II – Appendices). The Applicant confirms that that it considers the experts to be competent experts, as required by the EIA Regulations and has provided the following statement:

*"In accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), London Borough of Hillingdon (the Applicant) can confirm that the technical consultants appointed to contribute and author this Environmental Statement are considered to be competent experts and have demonstrated evidence of sufficient expertise to carry out robust assessment and reporting."*

## 1.8 Environmental Statement Availability

1.8.1 The ES and other planning application documents are available online or in hard copy at the planning offices of LBH. Additional copies of the ES can be provided on request (at a reasonable fee). Alternatively, a memory stick of the ES is available for a fee of £15 from Quod. The Non-Technical Summary can be obtained free of charge upon request in hard copy or electronic copy. All ES documents are available by calling Quod on 020 3597 1000 quoting Reference No. Q220454 or emailing [reception@quod.com](mailto:reception@quod.com).

1.8.2 Comments on the planning application can be made online during the applicable consultation period via <https://www.hillingdon.gov.uk/planning>

1.8.3 Alternatively, comments can be addressed in writing to: Hillingdon Council Planning Department, Civic Centre, High Street, Uxbridge, UB8 1UW.



Figure 1.1: Site Location Plan



## References

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<sup>1</sup> Ministry of Housing, Communities & Local Government (2023). National Planning Policy Framework. [online] GOV.UK. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>.

<sup>2</sup> Her Majesty's Stationary Office (HMSO), (1990). Town and Country Planning Act 1990. United Kingdom: Central Government.

<sup>3</sup> HMSO, (2017). The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Stationary Office. April 2017.

<sup>4</sup> HMSO, (2018). The Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018. The Stationary Office. October 2018.