

1 Introduction

1.1 Purpose

- 1.1.1 This Environmental Statement (ES) accompanies a full planning application for construction and operation of a water sports facility and outdoor activity centre at Broadwater Lake, Moorhall Road, Harefield, UB9 6PE (the 'Site') submitted by the London Borough of Hillingdon (LBH) as the applicant (the 'Applicant').
- 1.1.2 The Site is located approximately 5km north of Uxbridge town centre, adjacent to the Grand Union Canal and the south eastern edge of South Harefield. The Site extends to 79.95 hectares (ha) and its location is shown on Figure 1.1. The Site is partly located within the Mid-Colne Valley Site of Special Scientific Interest (SSSI). A description of the Site is provided in Chapter 2: Site and Setting.
- 1.1.3 A planning application was originally submitted to LBH as the local planning authority in November 2023 (Ref: 2382/APP/2023/2906 and referred to as the '2023 Scheme') and this was accompanied by an ES (the '2023 ES'). Since this time, the construction, design and operational assumptions for the submitted proposals have been substantially revised in response to feedback from stakeholders. The revised proposals have also been informed by further consultation with key stakeholders including LBH, Natural England and the Environment Agency. The principles of the 2023 Scheme Proposed Development however remain unchanged.
- 1.1.4 This ES reports the findings of the Environmental Impact Assessment (EIA) process for the revised proposals and provides the necessary environmental information to inform the decision-making process for the planning application. The ES describes the Proposed Development and the alternatives that were considered, reports the likely significant environmental effects of the proposals during its construction and operation, and sets out mitigation and monitoring measures. This ES also seeks to address other consultation comments raised in relation to the 2023 ES including an independent review of the ES by ARUP on behalf of LBH.
- 1.1.5 A preface is provided at the start of each chapter explaining how it has been updated since the 2023 ES.
- 1.1.6 This ES supersedes the 2023 ES in its entirety.

1.2 Background to the Proposals

- 1.2.1 The Proposed Development is designed to provide a replacement water sports and outdoor activity facility to one which formerly operated on approximately 18.2ha of land at Dews Lane, Harefield, UB9 6JN which also used the adjacent Harefield Number 2 Lake. This facility was formerly operated as Hillingdon Outdoor Activity Centre (HOAC) by a registered

youth educational charity¹. LBH owns the former HOAC facility, which the Colne Valley Youth & Community Association managed under a partnership agreement.

- 1.2.2 The HOAC-operated water sports and outdoor activity facility at Dews Lane was forced to close in October 2020 due to construction of High Speed 2 (HS2) Phase 1, the new high speed rail line connecting London, Birmingham and Crewe. The former HOAC facility is currently under the full control of HS2 and in use for construction activities associated with the Colne Valley Viaduct. Construction of the HS2 Colne Valley Viaduct also necessitated closure of the lake for recreational activities.
- 1.2.3 It was accepted that HS2 would impair the land-based activities of the HOAC-operated facility during the construction period, and the lake would also be unsuitable for recreational activities once the Colne Valley Viaduct is complete and HS2 is operational. As such, a legal agreement between HS2 Ltd, the Secretary of State for Transport and LBH was reached in 2017 which requires that LBH will use reasonable endeavours, working together with HS2 Ltd to design and implement a scheme for the relocation of the former HOAC facility to a suitable site(s) to be agreed with HS2 Ltd, the Association² and the relevant local authorities.
- 1.2.4 The Applicant conducted an extensive Alternative Sites Assessment to identify whether there are any suitable, deliverable alternatives to the Proposed Development at Broadwater Lake. The Applicant determined that Broadwater Lake was the most suitable site which meets the needs for an outdoor water sports facility that encompasses all uses that the former HOAC facility provided.
- 1.2.5 Further information on the background and need for the Proposed Development is provided in the Planning Statement which accompanies the planning application. Further information on the consideration of alternative sites and designs is provided in Chapter 4: Alternatives.

1.3 The Proposed Development

- 1.3.1 The replacement facility proposed at Broadwater Lake is known as the 'Hillingdon Water Sports and Activity Centre' (HWSFAC) and will be owned and managed by LBH. The facility will likely be operated by a third party under the control of LBH and will also be occupied by the Broadwater Sailing Club (BSC), which already uses Broadwater Lake for sailing and operates from a club house and associated facilities on the northern shore of the lake. The existing Broadwater Sailing Club facilities will be removed at this part of the Site will be returned to nature.
- 1.3.2 The HWSFAC would provide access to nature as well as land and water sports activities to schools, local communities, including disadvantaged and disabled groups, The facility has been designed to be an inclusive safe facility that caters for diverse needs.

¹ 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.

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- 1.3.3 The HWSFAC would only operate between 1 April and 31 September to avoid disturbance to wintering birds.
- 1.3.4 The proposals are subsequently referred to as the 'Proposed Development'. The Proposed Development will involve some minor works within Broadwater Lake including localised dredging, habitat enhancement and land reclamation to create a small platform for storing and launching boats. The Proposed Development will deliver landscaping and ecological mitigation and enhancement measures which are also designed to benefit the water environment.
- 1.3.5 The Applicant, as a public body, is committed to long-term management of the Site to conserve and enhance biodiversity and water environment and further the conservation and enhancement of the special features of the Mid-Colne Valley SSSI.
- 1.3.6 A full description of the Proposed Development is provided in Chapter 5: Description of the Development. A description of the construction activities and indicative programme is provided in Chapter 6: Construction.

1.4 Planning Context

- 1.4.1 The Site is within the administrative area of LBH and within the Greater London Authority (GLA) area. The boundaries of Buckinghamshire Council and Three Rivers District Council are adjacent to the west and north respectively, as shown on Figure 1.1.
- 1.4.2 The majority of the Site is located within the Mid Colne Valley SSSI³ which includes Broadwater Lake. All public bodies including the Applicant, Natural England and LBH as the local planning authority, have a legal duty under Section 28G of the Wildlife and Countryside Act 1981 to protect and enhance SSSIs: *"The duty is to take reasonable steps, consistent with the proper exercise of the authority's functions, to further the conservation and enhancement of the flora, fauna or geological features by reason of which the site is of special scientific interest"*. Public bodies also have duties relating to operations they carry out on or likely to affect SSSIs and operations they permit that may affect SSSIs. There is however, currently no legislative requirement for developers to provide measures that will improve or enhance a protected site, so if the Site is not in a favourable condition currently.
- 1.4.3 Alongside legislation, national planning policy sets the context for Local Plan policies and decision-making on planning applications by local planning authorities. The National Planning Policy Framework (NPPF)¹ (paragraph 193) sets out the principles which should be applied by local planning when determining planning applications which affect SSSIs.
- 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.

³ 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).

- 1.4.5 The Site has historically been subject to surface mineral workings for sand and gravel which led to the formation of Broadwater Lake. An Interim Development Order (IDO)⁴ (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 which allowed the working of Broadwater Lake for excavation of minerals and materials. This IDO remains valid.
- 1.4.6 Permanent planning permission is in place for operation of the existing sailing club and facility which is operated by Broadwater Sailing Club from the north shore of Broadwater Lake (Ref. 2382/AN/99/0609). Further information on planning history of the Site is provided in the Planning Statement which accompanies the planning application.
- 1.4.7 The HS2 Colne Valley Viaduct crosses the Mid-Colne Valley SSSI to the west of the lake, on a viaduct bisecting a Herts and Middlesex Wildlife Trust's Broadwater Lake Nature Reserve. 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 information on HS2 and other surrounding 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. 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 voluntarily committed to undertake an EIA.
- 1.5.2 The ES was prepared in line with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017² (as amended³) ('EIA Regulations'). 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' which was adopted by LBH on 19 May 2023 and set out their view of the scope and content of the ES. Whilst there have been some changes to the proposals since the Scoping Opinion was adopted, the ES is based on the LBH Scoping Opinion. Further information on the scope of the ES and the general approach to the EIA is provided in Chapter 3: EIA Methodology.
- 1.5.3 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.

⁴ An IDO is a planning document that provides guidance on handling applications for mineral workings. 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.

1.6 ES 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. Appendix 3.1 sets out 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, operation and management. 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 Project Team

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

Table 1.1: Consultant Project Team

Consultant Role / Input	Organisation
Applicant	LBH (Capital Programme Works Team)
Planning Consultants EIA Co-ordinator	Quod
Architect	Haverstock
Civils and Structural Engineers	Furness Partnership
Landscape Architects	Colour
Transport and Access	Robert West
Flood Risk and Surface Water Drainage	Weetwood
<i>ES Volume I (ES Chapters)</i>	
Chapter 1: Introduction Chapter 2: Site and Setting Chapter 3: EIA Methodology Chapter 4: Alternatives Chapter 5: Description of the Development Chapter 6: Construction	Quod
Chapter 7: Biodiversity	RPS-Tetrattech and Harper Environmental Limited
Chapter 8: Water Resources and Flood Risk	Johns Associates - ES chapter and supporting appendices Weetwood - Flood Risk, Drainage and Sequential Assessment

Consultant Role / Input	Organisation
Chapter 9: Ground Conditions and Contamination	Hydrogeo - ES chapter Geo-Integrity - Phase I desk-based study and Phase II site investigation
Chapter 10: Landscape and Visual Impact Assessment	Colour
Chapter 11: Summary of Significant Effects	Quod
<i>ES Volume II – Appendices</i>	Various
<i>ES Non-Technical Summary</i>	Various

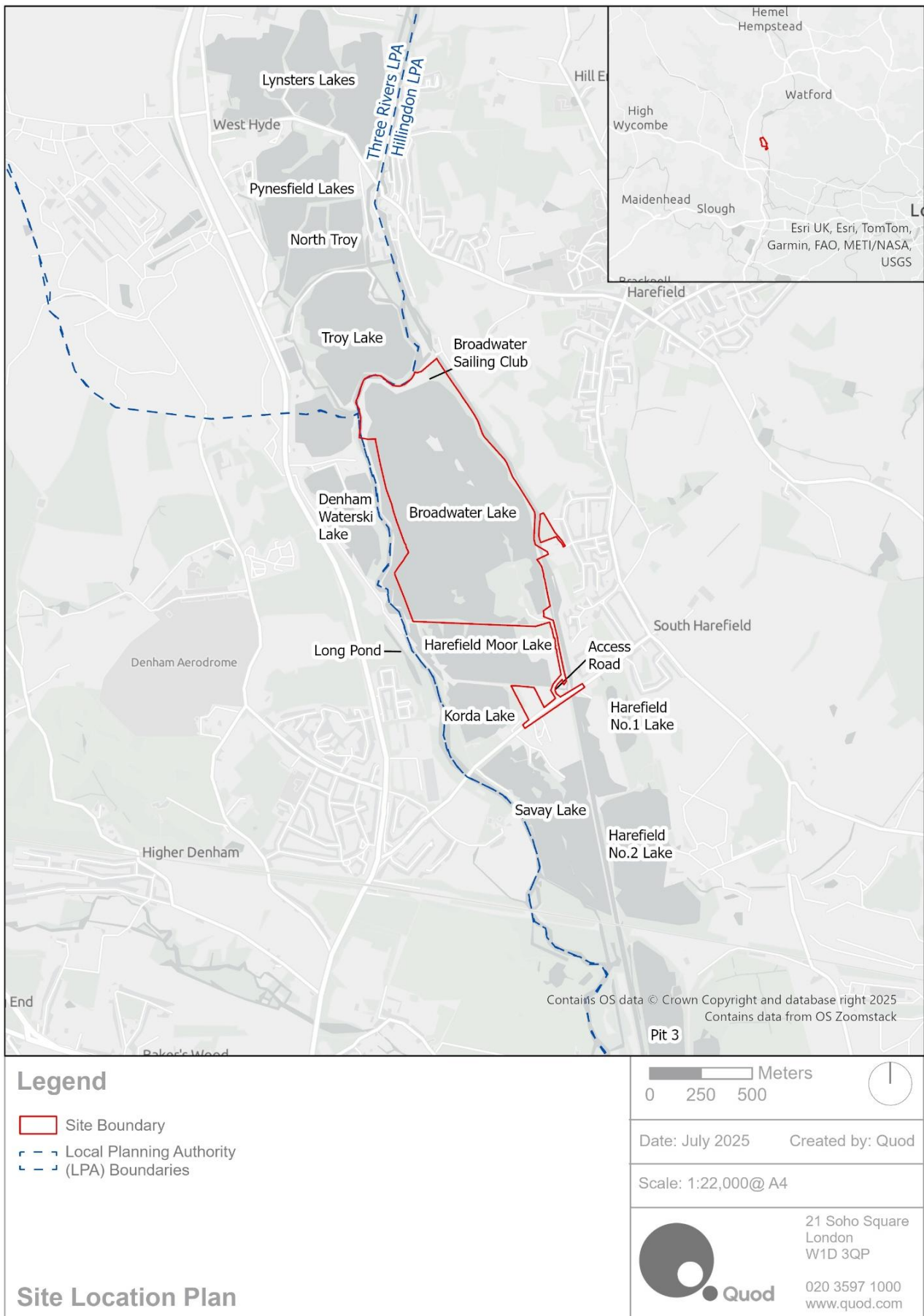
- 1.7.2 Regulation 18(5)(a) of the EIA Regulations requires that the ES must be prepared by 'competent experts'.
- 1.7.3 Quod is the lead editor of this ES and author of certain chapters as identified in Table 1.1. Quod is a member of the Institute of Environmental Management and Assessment (IEMA) EIA 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 7-10 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 ES 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.
- 1.8.2 Comments on the planning application can be made online during the applicable consultation period <https://www.hillingdon.gov.uk/planning> quoting Ref: 2382/APP/2023/2906). 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

¹ Ministry of Housing, Communities & Local Government (2025). National Planning Policy Framework. [online] GOV.UK. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

² HMSO, (2017). The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Stationary Office. April 2017.

³ HMSO, (2018). The Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018. The Stationary Office. October 2018.