

OUR REF: HS2-LBH-SC-027

Dear Michael,

I refer to your email below of 25 November 2025 and thank you for re-consulting HS2 Ltd on the above matter.

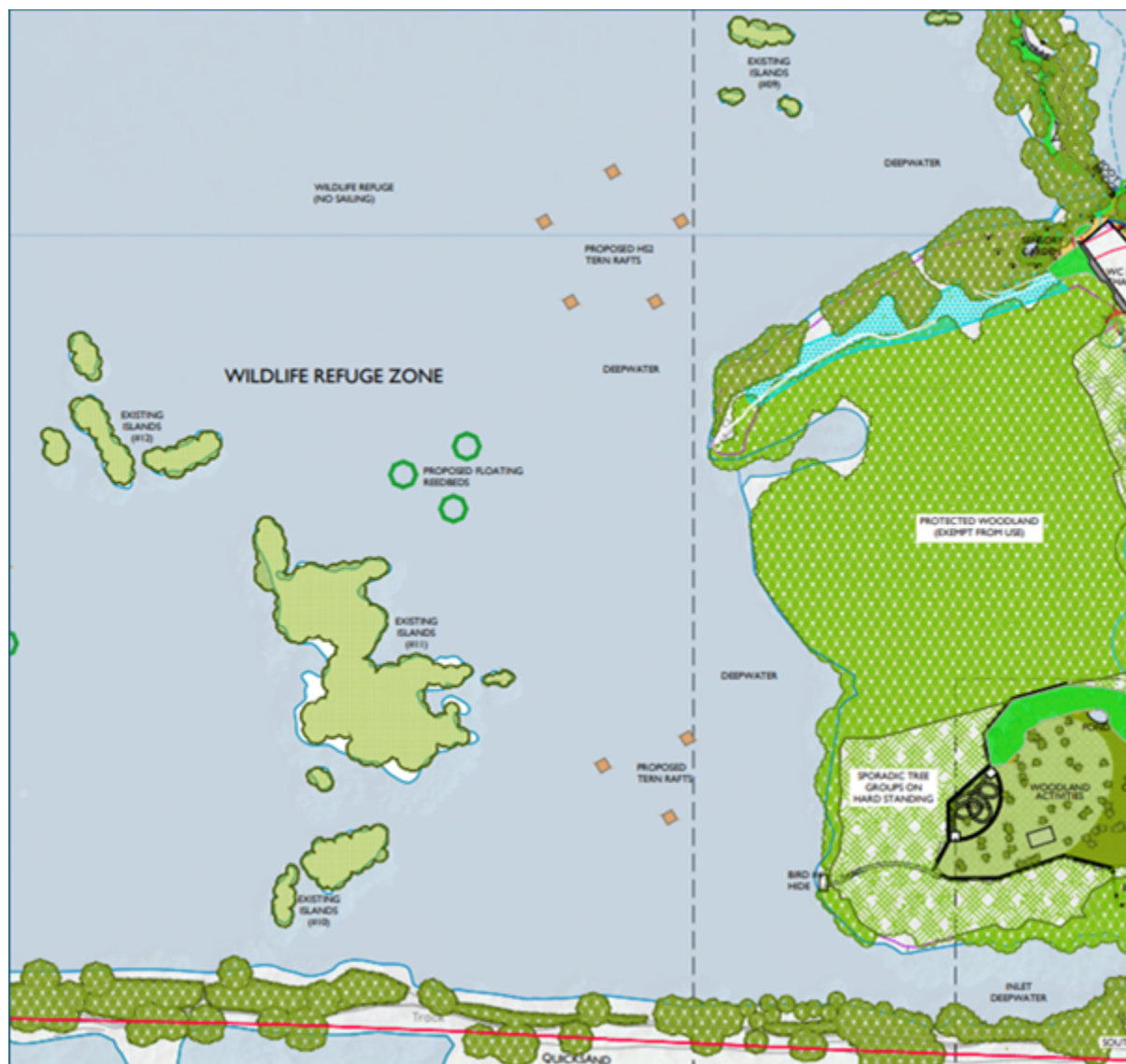
Firstly, as you are already aware safeguarding is an established part of the town planning process, designed to ensure that land which has been identified for major infrastructure projects is protected from conflicting developments. Further information and guidance for Local Planning Authorities is available online here:

<https://www.gov.uk/government/collections/safeguarding-information-and-maps-for-hs2#guidance>.

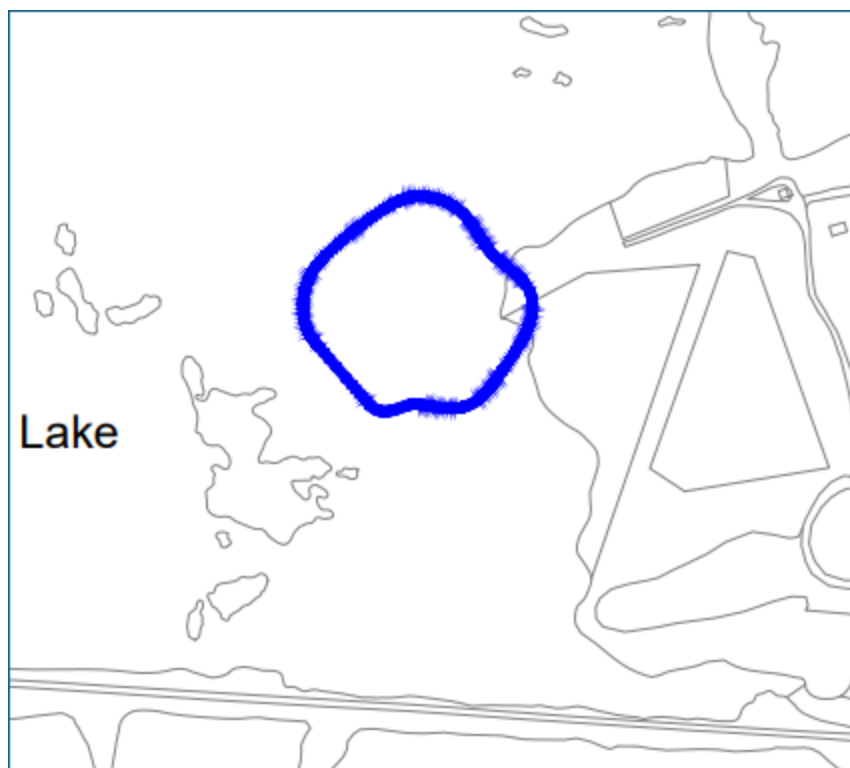
After review by relevant subject matter experts within the Integrated Project Team (IPT) for the area, we have the following observations and comments to make on the application proposals following submission of amended plans and documents.

- From both the standalone plans and those embedded in other documents, it seems to show the approved HS2 floating gravel islands within Broadwater Lake (LBH reference: 73263/APP/2024/2181, approved on 22/10/2024) in slightly the wrong place, i.e. more northerly than HS2's own Schedule 17 plans.

Snip from Non-Technical Summary, Figure 7 Proposed Development Masterplan:



Snip from HS2's consented Schedule 17 application:



- It is also noted the gravel islands are referenced in different ways depending on the plan/document being referred to e.g. *“Proposed HS2 tern rafts”, “HS2 mitigation: 5no. floating gravel tern rafts” “tern rafts to be funded by HS2”, “notional HS2 mitigation area”, “five floating gravel tern rafts to assist with HS2 mitigation”, and “five floating bird nesting rafts are proposed”*. It would be helpful if same terminology is used as HS2’s to be consistent across all of the applicant’s documents and it also made clear that the gravel islands are not proposed/notional, but approved by the LPA as of October 2024, so the revised planning application (dated November 2025) should reflect this.
- The application as amended mentions that the gravel islands are HS2 mitigation, however the applicant also seems to be capturing them in their list of proposed enhancement measures in the Planning Statement. In interests of ensuring there is no double counting of mitigation it is advised that the applicant’s proposal should make clear the HS2 gravel islands are not an enhancement measure to mitigate the application proposals.
- In the ES Non-Technical Summary and ES Vol I Chapter 7 Biodiversity it is stated that:
 - *“Construction of the viaduct was completed in 2024 and therefore only cumulative effects of the operational HS2 are considered”*
 - *“The only potential cumulative impacts are from visual and noise disturbance to birds using Broadwater Lake once HS2 trains are running”*
 - *“The construction of the Colne Valley Viaduct is complete and there would therefore be no overlap in construction activity”*
 - *“The only potential cumulative impacts are with the HS2 scheme, however the construction has now completed and therefore only operational phase cumulative effects are considered”*.
- In the above context the Senior Project Manager for the area construction team

advises it could be considered that when HS2 railway is in 'service/operational' then construction has ended. However, there will likely be finishing work possibly after the HS2 railway is in 'service/operational' and as such 'construction' may continue. At present time the strategy for the Interim Asset Management Contractor (IAMC) remains to be confirmed including when the finishing works happen for HS2 construction to be considered completed.

- In short therefore, HS2 'construction' will be ongoing post completion of the viaduct and on basis that associated works will overlap with the timeframe for constructing and operating the application proposals there is a need for HS2's committed status to have been properly accounted for in the developers' cumulative impact assessments and not solely HS2 operation.
- In the Outline Mitigation, Enhancement and Management Plan it is stated that "*A Steering Group will be established to oversee the implementation of the management plans and make recommendations/decisions to ensure the statutory duties are met and whilst also meeting the goals of the Development. The Steering Group will be formed of statutory bodies, including Natural England, the Environment Agency, HS2 and the Canals and Rivers Trust*".
- In respect of the above, HS2 Ltd wishes to clarify that whilst regular dialogue already takes place between relevant stakeholders, at present time we are unaware of a formal approach/invitation to join such a Steering Group.
- The ES Vol I Chapter 7 Biodiversity mentions that: "*Desk study information provided on bat roosts by HS2, and bat surveys of trees and buildings (2023 and 2025) have been incorporated to establish the ecological baseline with regards to bats*" and "*...the latest available radio tracking data from HS2, provided in May 2023, has allowed characterisation of the use of the full Site by bats including the islands to be established*".
- With regard to the above, HS2's appointed contractor Align undertook bat monitoring via radio tracking during 2022, 2023 and 2024. It is therefore presumed that the applicant only has the 2022 data, which begs question of whether any further data was requested from HS2 or it's appointed suppliers when revising the planning application as now proposed? Consequently, the applicant could be missing out on relevant information e.g. if HS2/Align identified any more roosts within/adjacent to the application site.

In conclusion, HS2 Ltd welcomes that majority of queries raised in our previous consultation response are either no longer relevant, or have been addressed under the proposed revised design which appears more sympathetic compared to the original iteration, and also appears to have involved extensive consultation with other statutory consultees including Natural England to address the concerns/objections raised during consultation on the original application.

However, in light of the above observations whilst there are no objections to the proposed development in planning terms the practicalities associated with delivering respective construction programmes will need to be managed by attachment of appropriately worded compliance style planning conditions in event the Council is ultimately minded to grant consent. As such HS2's approval is subject to conditions to include requirements to submit a Construction Environmental Management Plan (CEMP) and Construction Logistics Plan (CLP) to ensure that the proposed development does not restrict or delay delivery of any

consented HS2 works in this area.

Suggested wording for those conditions is as follows:

“Construction and Environmental Management Plan:

No development shall commence, including any works of demolition, until a detailed Construction and Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall include, but not be limited to, the following details (where appropriate):

i. a construction programme including a 24-hour emergency contact number; ii. complaints procedures, including complaint response procedures; iii. air quality mitigation measures, including dust suppression; iv. parking of vehicles of site operatives and visitors (including measures taken to ensure satisfactory access and movement for existing occupiers of neighbouring properties during construction); v. arrangements to demonstrate how any concurrent construction with HS2 works shall not impede the construction of the HS2 works; vi. arrangements to minimise the potential for noise and vibration disturbance, vii. locations for loading/unloading and storage of plant and materials used in constructing the development; viii. details showing the siting, design and maintenance of security hoardings; ix. wheel washing facilities and measures to control the emission of dust and dirt during construction; x. site lighting details; xi. site drainage control measures; xii. tree protection measures in accordance with BS 5837:2012; xiii. details of ecological mitigation measures including an operational lighting scheme for bats; xiv. details of specific mitigation in relation to breeding or foraging black redstart; xv. details of biodiversity and arboricultural mitigation measures including a pre-commencement check by an ecological clerk of works (ECoW) to determine whether nesting birds are present; xvi. a scheme for recycling/disposing of waste resulting from demolition and construction works in accordance with the waste hierarchy and circular economy principles; xvii. An Unexploded Ordnance assessment to be undertaken; xviii. Membership of the Considerate Constructors Scheme. The development, including any works of demolition, shall only be carried out in accordance with the approved CEMP.

Reason: To safeguard the HS2 Phase One programme and to protect HS2 assets.”

“Construction Logistics Plan:

No development shall commence, including any works of demolition, until a detailed Construction Logistics Plan (CLP) has been submitted to and approved in writing by the Local Planning Authority. The CLP shall include information on:

i. forecast programme and construction trips generated; ii. booking systems; iii. consolidated or re-timed trips; and iv. secure off-street loading and drop off facilities; v. use of logistics and consolidation centres; vi. re-use of materials on-site; vii. collaboration with other sites in the area; viii. use of rail and water for freight; and ix. implementation of a staff travel plan x. any areas for the parking of vehicles of site operatives and visitors (including measures taken to ensure satisfactory access and movement for existing occupiers of neighbouring properties during construction). The development, including any works of demolition, shall only be carried out in accordance with the approved CLP.

Reason: To safeguard the HS2 Phase One programme and to protect HS2 assets.”

In addition to the above conditions the following standard informative is also recommended for purposes of awareness:

"Informative:

The developer is advised that the application site is in vicinity of land required to construct and/or operate Phase One of a high-speed rail line between London and the West Midlands, known as High Speed Two. Powers to construct and operate High Speed Two were secured on 23 February 2017 when Royal Assent was granted for Phase One of HS2. Accordingly, the applicant is advised to follow ongoing progress of the HS2 project at: [HS2 Phase One - GOV.UK](#)."

It is hoped the above comments assist in demonstrating need for ongoing co-ordination between the two schemes and controls needed to ensure objectives of safeguarding the HS2 project are adequately protected.

Should the LPA be minded to approve the application without such planning conditions, (or similarly worded alternatives to achieve same objectives), against the formal advice of HS2 Ltd they should, in accordance with paragraph 6 of the Safeguarding Directions dated 22 August 2018, be sent, together with the material specified in paragraph 7 of the Safeguarding Directions, by authorities by first class post to:

High Speed Rail Property Team

Department for Transport

Great Minster House

33 Horseferry Road

London

SW1P 4DR

Or by email to: highspeedrail@dft.gov.uk and copy email to: town.planning@hs2.org.uk.

Should any further information or clarification be required of any of the above comments please do not hesitate to contact me at this mailbox address: town.planning@hs2.org.uk.

Yours sincerely,

James Fox | Safeguarding Planning Manager, Railway Directorate | HS2 Ltd

Tel: 0121 720 5066 | Mob: 07881 802995 | james.fox@hs2.org.uk | [Facebook](#) | [Twitter](#) | [LinkedIn](#)

High Speed Two (HS2) Limited, Two Snowhill, Snow Hill Queensway, Birmingham, B4 6GA
| www.gov.uk/hs2

From: PlanningEConsult@Hillingdon.Gov.UK <PlanningEConsult@Hillingdon.Gov.UK>

Sent: 25 November 2025 12:20

To: Town Planning <town.planning@hs2.org.uk>

Subject: [EXTERNAL] Planning Consultation for 2382/APP/2023/2906

LONDON BOROUGH OF HILLINGDON

NOTE: we now use an automated system to retrieve these replies, to respond to this consultation please **click the reply button** on the top of the tool bar, **do not change the subject line or e-**

mail address, enter your comments and attach any associated documents you wish to submit and then click send.

Our Ref: **2382/APP/2023/2906**

Date: **25th November 2025**

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

BROADWATER LAKE MOORHALL ROAD HAREFIELD

O.S.Sheet/s: Eastings: 504819 Northings: 189172

Proposal: 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 including changing facilities, meeting rooms, storage, Workshop and seasonal worker accommodation (sui generis), activity shelters; installation of pontoons and slipways; boat shed; equipment storage huts; 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; access road; localised dredging and land reclamation; relocation of existing sailing area and creation of floating reedbeds within the lake; coach drop off and turning area; vehicle parking; cycle parking; and associated works. (Re-consultation following submission of amended plans and documents)

Please find below details of the above-mentioned application which has been received by this Council.

We shall be pleased to receive any comments you may wish by **16 December 2025** and these will be taken into account when this Council determines the application.

To comment on this application please follow the instructions at the top of this email carefully.

Full details of the planning application, including the plans, can be viewed on the Council's web site

[Click here to view application](#)

From the date of receiving this letter it may take 2-3 days for the plans to be placed on the web site.

All enquiries about this application should be made to the case officer **Michael Briginshaw** on Tel: **01895 250230**.

Yours Faithfully

London Borough of Hillingdon Planning Services

Pconstat (ODB)

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