

Hillingdon Water Sports Facility and Activity Centre

Equality Impact Assessment

Hillingdon Council

JUNE 2025

EQUALITY IMPACT CONSULTING LTD



Status	Version	Date	Author	Purpose/Changes
First Version EqIA Report	V1	17/06/2025	Laura Walker	For planning application

Table of Contents

Executive summary	3
1. Introduction	7
Purpose of this report.....	7
Background to the HWSFAC.....	7
Report structure	8
2. Approach to the EqIA.....	9
Introduction	9
3. Legislation, policy and guidance	13
Introduction	13
Key legislation	13
Guidance and best practice.....	15
Policy and Plans	17
4. The proposed development	19
Introduction	19
Existing sites	19
The proposed development.....	24
5. Consultation and engagement	30
Introduction	30
Stakeholder engagement	30
Public engagement	30
User group engagement.....	30
6. Evidence	31
Introduction	31
Study area.....	31
Protected characteristic groups	35
7. Assessment of impacts	44
Introduction	44
Scope of assessment.....	44
Potential impacts.....	45
8. Recommendations and conclusions.....	55
Recommendations	55
Conclusions	57
Appendix A: Barriers to participation and actions.....	60
Appendix B: Example social impact indicators	65

Executive summary

The purpose of this report

This report sets out an Equality Impact Assessment (EqIA) for the Hillingdon Water Sports Facility and Outdoor Activity Centre (HWSFAC).

London Borough of Hillingdon (the Council) has a duty under the Equality Act 2010 and the associated Public Sector Equality Duty (PSED) to ensure that its activities do not lead to unlawful discrimination (direct or indirect), that it advances equality of opportunity and that it fosters good relations between those with a protected characteristic and all others.

Protected characteristic groups include age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The PSED must be exercised in substance, with rigour and with an open mind. The assessment of the risk of discrimination **must** be done before a decision is made by the Council and not as an afterthought.

It is the Council's policy that an EqIA is undertaken for all its activities. An EqIA helps to assess impacts in an evidenced and accountable way. It demonstrates how due regard has been paid to the PSED and reduces potential for legal challenge on the basis of discrimination or disadvantage. It also helps to identify actions to minimise negative effects and enhance positive social outcomes.

The HWSFAC

HWSFAC replaces facilities at the Hillingdon Outdoor Activity Centre (HOAC). HOAC was closed in October 2020 after being subject to a Compulsory Purchase Order to facilitate the new HS2 route. There is a statutory requirement for HS2 to fund the relocation of HOAC to an alternative site. A site at Broadwater Lake has been identified as the only suitable alternative site to deliver HWSFAC.

HWSFAC will provide land and water based activities and overnight accommodation facilities for a diverse range of user groups, including children, young people and disabled people. Employment opportunities include construction and maintenance related work, in addition to roles for permanent staff, seasonal staff and volunteers. The centre will also deliver learning and skills development opportunities through an ecology field studies centre, nature based learning for children and leadership training for young people and adults.

Whilst HOAC provided a valuable resource for outdoor activity, its facilities were outdated, incomprehensive and non-compliant with relevant standards and legislation. User group engagement identified inadequate accessibility, and insufficient changing rooms and toilet facilities as key issues at HOAC and other local outdoor activity centres. Improvements such as secure drop-off areas, better storage solutions, and enhanced communal spaces were also needed. As a new build, inclusive design needs to be at the core of the HWSFAC and relevant guidance must be followed to support this. In line with the Equality Act 2010, the differing needs of all groups must be considered to deliver a fully accessible centre. The centre should provide flexible, practical, accessible and safe spaces for activities, overnight accommodation, sanitary provision, food preparation and storage, medical storage and facilities, learning and training, quiet/reflective time, storage of equipment, movement around the site and vehicle access.

Key issues for protected characteristic groups

The target user groups of the HWSFAC include those who share protected characteristics that may impact on their ability to participate in activities. For example, some protected characteristic groups experience barriers that may result in disproportionately low participation in physical activity, access to nature, employment and education. This in turn can lead to inequalities in terms of health, wellbeing and socio-economic outcomes. Barriers can be 'visible', such as physical barriers due to mobility impairment. Others may be more 'invisible', for example barriers around confidence and body image. Examples of barriers include:

- **Physical and accessibility barriers** - Some disabled people require accessible toilets including Changing Places provision for severely disabled people. Parents with babies and young children may need larger facilities to accommodate all family members, especially those who are disabled. Infirmities in older people can limit an individual's ability to move freely and access different locations or environments.
- **Social and personal barriers** - Women, trans people, and people from certain ethnic minority and religious groups may have specific privacy needs and be uncomfortable using communal changing rooms. Women and girls might experience barriers because of the lack of adequate provision of toilets due to menstruation or menopausal needs. Some groups lack confidence or feel unwelcome, potentially due to a lack of representation of their protected characteristic in a given activity. Neurodiverse people can experience barriers due to anxiety with unknown spaces and could need quiet or calm zones to retreat from sensory overload.
- **Cultural barriers** - Some ethnic minority and religious/belief groups have certain dietary requirements which affect how they access, prepare and store food. Cultural factors can also include barriers such as dress codes and expected behaviours. Some religious groups may require spaces for worship, prayer or reflection.
- **Communication barriers** - Older people and disabled people can experience barriers with accessing digital information and require alternative formats. Those who do not have English as their first language may require information communicated in a different language. Some groups with learning difficulties and those who are neurodiverse might respond better to instructions delivered in a more tailored way, for example, shorter more concise and hands-on demonstrations.
- **Practical barriers** - some disabled people may require access to specialist equipment, training, health care, medical storage facilities, specialist accommodation or trained staff to support them with activities. Other groups including women, may experience time barriers due to commitments such as childcare or other caring responsibilities. For some groups, transport can be a barrier due to a lack of public transport options or reliance on someone else to drive them.
- **Affordability barriers** - many groups face barriers due to the cost of activities as well as associated equipment and clothing. Lack of affordable transport options may also be a barrier.

These barriers can intersect and combine to create further challenges. Addressing these barriers requires a multi-layered approach that considers the specific needs of groups.

Assessment of impacts

The impact assessment identifies potential positive and negative impacts of the proposed development on protected characteristic groups throughout the design, construction and operation phases. This includes where:

- Those who share a protected characteristic form a disproportionately large number of those affected by the proposed development. For example, children and disabled people will be the main user groups of the HWSFAC;
- Groups who share protected characteristics are particularly vulnerable to a potential impact or may not have an equal share in the social benefits. This can be due to direct or indirect discrimination associated with the above barriers to participation. In particular, this is the case where appropriate mitigations or actions have not been included to overcome such barriers.

The assessment identifies that the proposed development will contribute towards positive impacts on protected characteristics including:

- **Reduced barriers to physical and outdoor activity through the construction of an improved quality and more inclusive outdoor activity centre in Hillingdon.** This replaces outdated facilities at the existing HOAC site with brand new accessible facilities at Broadwater Lake. This supports positive physical and mental health outcomes by promoting higher levels of physical activity and increased access to nature for those who have low levels of participation such as women and girls, ethnic minority groups and disabled people.
- **Access to employment and volunteering opportunities** during the construction, operation and maintenance of the centre. The inclusive design of staff facilities and accommodation makes opportunities for employment at HWSFAC more accessible for disabled people, women and young people (especially those aged under 18). Disadvantaged groups such as Gypsy, Roma Travellers, SEND students, asylum seekers and refugees could benefit from opportunities, if supported by relevant training, procurement and recruitment policies.
- **Access to learning and skills development opportunities.** This includes educating children and young people about ecology and care for the environment. It will also provide leadership skills and training opportunities for young people as well as informal learning, role models, mentoring, coaching and volunteering opportunities.

Potential negative impacts of the proposed development include:

- Relatively low levels of public transport accessibility, which may indirectly disadvantage groups who are less likely to have access to a private car. However, it is also anticipated that most groups will visit the site by minibus or coach. Analysis shows that 21% of all school pupils in England attend a school located within a 60 minutes drive to the site. This means that the site is potentially accessible and affordable for day trips from these schools.
- Construction related impacts can disadvantage those who are more vulnerable to the adverse effects of increased noise, air pollution and diversions e.g. disabled people, older people, people with pushchairs and children. Construction traffic and works may have a disproportionate impact on the local Gypsy Roma community who live near the site, as well as existing users of the lake. Construction management plans will need to take the specific needs of these groups into account.

The Equality Act 2010 and the PSED

Under the Equality Act 2010 the Council could be at risk of discriminating against or disadvantaging groups who are unable to use HWSFAC facilities or participate in activities because of their protected characteristics. There is no objective justification for worse impacts on someone with a protected characteristic than on those without, given that the target end user groups of the centre are those that face most barriers to participation. It is essential as a new build that the proposed development is inclusive to all groups from opening, to avoid discrimination or disadvantage. The findings of the assessment with regards to the three aims of the PSED are:

Aim 1: To eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act

Overall, the Council is paying due regard to the first aim of the PSED, seeking to eliminate discrimination and barriers to participation through inclusive design. Relevant guidance is being followed to create an inclusive centre for all user groups. The outdoor activities provided at HWSFAC have been selected so that all activities are accessible to everyone including disabled people. Facilities such as overnight accommodation are being designed in collaboration with end-user groups to ensure the needs of a range of groups are met within a safe environment.

The flexible layout of the buildings and volume and range of facilities available is fundamental to inclusive design. This flexibility allows toilets, changing facilities, food preparation areas, sleeping accommodation, storage facilities and activity spaces to be designated and adapted according to the specific requirements of individual user groups. For example, the provision of large, family-sized and

individual changing rooms allows for different arrangements depending on the sex and age profiles of the groups and further specific intersectional needs such as privacy concerns relating to race, religion, sex or gender reassignment. This reduces the risk of discrimination and disadvantage.

Aim 2: To advance equality of opportunity between people who share a protected characteristic and those who do not by:

- Removing or minimising disadvantages suffered by people due to their protected characteristics;
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people; and
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

Overall, the Council is addressing the second aim of the PSED by taking steps to meet the needs of different groups so that they can participate in activities provided at HWSFAC. Target user groups of HWSFAC often face the most barriers and have disproportionately low levels of participation in physical activity, access to nature, employment and learning new skills.

Consultation and engagement activities with user groups to date have identified specific requirements based on the lived experience of these groups. A full review of existing facilities at HOAC and other centres has been undertaken and has identified areas for improvement and best practice.

Aim 3: Foster good relations between people who share a protected characteristic and those who do not.

The proposed development supports good relations between those who share a protected characteristic and those who do not. It is able to host a diverse range of groups at the same time whilst aiming to create an environment which is free from bullying, harassment and victimisation. By creating inclusive space for working, learning and other activities where everyone can participate and no-one is disregarded, there is opportunity to encourage positive interaction between groups, increase understanding and tackle prejudice.

Conclusions and recommendations

Overall, the Council is demonstrating a commitment to eliminating discrimination and advancing equality of opportunity through the delivery of the HWSFAC. There are few outdoor activity centres in the UK providing accessible day and overnight facilities to the level of the proposed development and it has the potential to become an exemplar of genuine accessible and inclusive design.

The requirements of the Equality Act 2010 are about how overall services and experience are provided rather than the design of the building alone. Therefore, it will be necessary to ensure that effective operational, workforce, and management policies, procedures and processes are implemented to eliminate discrimination and protect employees, volunteers and guests of the centre from harassment and victimisation. This includes, but is not limited to, workforce policy and plans, procurement of goods and services, safeguarding, ongoing maintenance, social benefits plans and health and safety. The Council must adhere to the best practice guidance from the Health and Safety Executive (including AALA), Sport England, OEDP, Ofsted, DfE and Building Standards.

The Council has existing policies, measures and commitments in place which minimise unintended negative impacts on groups and encourage participation. Further recommended actions are set out in this report (Table 8-1). These include annual accessibility audits, a skills, employment and education plan, an information and communication strategy and a social value plan. These should be supported by engagement and feedback from users, employees and volunteers of HWSFAC.

The PSED is an on-going process, and as such, it is important to consider the EqIA as a live document, to be updated, refreshed and the recommended actions monitored on a regular basis.

1. Introduction

Purpose of this report

- 1.1 London Borough of Hillingdon (the Council) has commissioned Equality Impact Consulting to prepare an Equality Impact Assessment (EqIA) for the Hillingdon Water Sports Facility and Activity Centre (HWSFAC) at Broadwater Lake, Harefield.
- 1.2 As a public sector organisation, the Council has a duty under the Equality Act 2010 and the associated Public Sector Equality Duty (PSED) to ensure that its policies, programmes and services do not lead to unlawful discrimination (direct or indirect), that it advances equality of opportunity and that it fosters good relations between those with a protected characteristic¹ and all others.
- 1.3 The Council must exercise its duty in substance, with rigour and with an open mind. The assessment of the risk of discrimination must be done before a decision is made by the Council and not as an after thought. Consideration of issues and effective planning to address inequalities is essential to avoid a legal challenge.
- 1.4 The HWSFAC project (the proposed development) will include an outdoor activity centre providing educational and recreational services for users including school groups, charitable organisations and sports societies. The end users of the HWSFAC will include children, young people, disabled people and those who are disadvantaged.
- 1.5 The HWSFAC will also be a place of employment and volunteering for Council staff and other service providers.
- 1.6 As such, it is important that the Council assesses potential equality impacts for a wide range of potential user groups in the delivery of the proposed development. This includes identifying and addressing barriers to participation for users.
- 1.7 It is the Council's policy that EqIAs are undertaken for all policies, provisions, criteria, functions, practices and activities, including the delivery of services. An EqIA is a useful tool to consider the impact of the Council's activities in an evidenced, structured, consistent and accountable way. Demonstrating how the Council has paid due regard to the PSED and the Equality Act 2010 reduces the potential for legal challenge on the basis of discrimination or disadvantage and helps to maximise the positive social outcomes of the project.
- 1.8 The Council must address identified impacts and follow best practice and guidance with regards to the design, construction, operation and maintenance of the proposed development. This includes Health and Safety Executive (including AALA), Sport England, OEDP, Ofsted, DfE and Building Standards.

Background to the HWSFAC

- 1.9 The Hillingdon Outdoor Activity Centre (HOAC) site, located on Dews Lane was subject to a Compulsory Purchase Order to facilitate the new HS2 route. The site is now under the control and partial ownership of HS2 and the facility has been closed since October 2020. The High-Speed Rail (London – West Midlands) Act 2017 included a statutory requirement for HS2 to fund the relocation of HOAC to an alternative site.
- 1.10 The Broadwater Lake site has been identified as the only suitable and available site to deliver a new centre. The proposed development will be known as the HWSFAC and will also incorporate

¹ Protected characteristics are age, sex, disability, race, religion, sexual orientation, gender reassignment, pregnancy and maternity, and marriage and civil partnership.

Broadwater Sailing Club and an angling club that currently uses Broadwater Lake.

- 1.11 A planning application was submitted for the site in November 2023². An amendment is to be submitted in 2025 with changes made to the design based on comments received on the original application.
- 1.12 This EqIA is based on the new planning application design set out in the Planning (Pre-) application Design Strategy Document 1329_D006.

Report structure

1.13 Following on from this introduction section, the remainder of the report is structured as follows:

- **Section 2: Approach to the EqIA** – sets out the approach to undertaking the assessment;
- **Section 3: Legislation, guidance and policy** – relevant legislation and guidance associated with equalities and planning for outdoor activity;
- **Section 4: The proposed development** – an overview of the proposed development which forms the basis of this assessment;
- **Section 5: Consultation and engagement** – a summary of consultation undertaken to date on the proposed development;
- **Section 6: Evidence** – review of relevant data and research to understand potential impacts and barriers to participation for protected characteristic groups;
- **Section 7: Assessment of impacts** – an assessment of impacts of the proposed development on protected characteristic groups; and
- **Section 8: Recommendations and conclusions** – Recommendations for enhancing positive equality impacts and minimising potential negative impacts. Conclusions as to the extent to which the Council has paid due regard to the PSED.

² Planning application ref 2382/APP/2023/2906

2. Approach to the EqIA

Introduction

2.1 The EqIA is focused on the potential impacts on user groups of the proposed development. An evidence based methodology for preparing the assessment has included the following steps:

Step 1: Evidence review

2.2 A desk-based evidence review has been undertaken, comprising a review of:

- Relevant legislation, policies and guidance relating to equality in the context of planning for sports and recreation;
- Documentation regarding the proposed development;
- Consultation and engagement activities to date; and
- Data and research relating to protected characteristic groups in the context of physical activity, employment and education.

Step 2: Assessment of impacts

2.3 The assessment of equality impacts has been based on the information gathered in Step 1. Potential positive and negative impacts experienced during construction and operational phases have been assessed. A judgement has been made as to how the proposed development could contribute to the PSED for groups with protected characteristics as defined in the Equality Act 2010. The EqIA has considered impacts on groups of people not on specific individuals. Definitions for each group³ are as follows:

- **Age:** A person belonging to a particular age or range of ages. The following groups have been included in this assessment:
 - Children (aged under 18 years of age)
 - Young people (aged 18-24 years)
 - Older people or pensioners (aged 65 years and over).
- **Disability:** A person has a disability if she or he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities⁴. A disability can arise from a wide range of impairments which can be:
 - physical impairments, such as mobility difficulties
 - sensory impairments such as those affecting hearing or sight
 - learning difficulties, including people with specific learning difficulties such as dyslexia and dyspraxia
 - mental health conditions or illnesses which have a long-term effect such as depression and anxiety, panic attacks, phobias, eating disorders, obsessive compulsive disorders,

³ <https://www.equalityhumanrights.com/equality/equality-act-2010/protected-characteristics>

⁴ [Disability: Equality Act 2010 - Guidance on matters to be taken into account in determining questions relating to the definition of disability \(HTML\) - GOV.UK](#)

schizophrenia and bipolar affective disorder, post traumatic stress disorder, and some self-harming behaviour

- genetic and progressive conditions, if the condition affects the ability to carry out normal day-to-day activities, such as motor neurone disease, muscular dystrophy and forms of dementia
- conditions which are characterised by several cumulative effects, such as pain or fatigue
- hidden impairments such as diabetes if this has an effect on day-to-day activities
- impairments with fluctuating or recurring effects such as rheumatoid arthritis, myalgic encephalitis (ME), chronic fatigue syndrome (CFS), fibromyalgia, depression and epilepsy
- auto-immune conditions such as systemic lupus erythematosus (SLE)
- organ specific, including respiratory conditions, such as asthma, and cardiovascular diseases, including thrombosis, stroke and heart disease
- neurodiverse and developmental disorders, such as autistic spectrum disorders (ASD), attention deficit hyperactivity disorder (ADHD) dyslexia and dyspraxia
- produced by injury to the body, including to the brain
- past history of impairment - this applies if someone is no longer disabled but met the definition in the past.

The Social Model of Disability states that people have impairments, not disabilities. The term 'people with disabilities' can confuse impairment and disability and implies disability is something caused by the individual, rather than society. A disability can be caused by society's unwillingness to meet the needs of people with impairments. As a result, the term 'Disabled people' has been used to describe people with impairments who are disabled by barriers constructed by society.

- **Gender reassignment:** Where a person undergoes, or proposes to undergo, a process for the purpose of reassigning their gender identity.
- **Marriage and civil partnership:** Marriage is a union between a man and a woman or between a same-sex couple. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples (except where permitted by the Equality Act).
- **Pregnancy and maternity:** Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.
- **Race:** A race is a group of people defined by their colour, nationality (including citizenship) ethnicity or national origins. A racial group can be made up of more than one distinct racial group, such as Black British.

- **Religion or belief:** Religion refers to any religion, including a lack of religion. Belief refers to any religious or philosophical belief and includes a lack of belief. Generally, a belief should affect your life choices or the way you live for it to be included in the definition e.g. ethical veganism.
- **Sex:** A man or a woman. It can mean a group of people like men or boys, or women or girls, while gender refers to the wider social roles and relationships that structure men's and women's, boys' and girls' lives.
- **Sexual orientation:** Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes. A person's sexual orientation relates to their emotional, physical and/or sexual attraction and the expression of that attraction. Whilst this is the official definition under the Equality Act it is recognised that the definition of sexual attraction can be wider.

2.4 In line with Council guidance, the assessment has also considered potential impacts in relation to carers, socio-economic background, community cohesion, community relations and human rights.

2.5 The assessment has considered both differential and disproportionate effects;

- A **differential** equality effect is one which affects members of a protected characteristic group differently from the rest of the general population because of specific needs, or a recognised vulnerability or sensitivity associated with their protected characteristic.
- A **disproportionate** equality effect arises when an impact has a proportionately greater effect on a protected group than on the general population overall.

2.6 The criteria used to determine disproportionate or differential impacts with respect to protected characteristics groups has included:

- Those who share a protected characteristic form a disproportionately large number of those affected by the proposed development. For example, children and disabled people will be the main user groups of HWSFAC;
- Amongst the population/groups affected by the proposed development, people who share protected characteristics are particularly vulnerable or sensitive to a potential impact. For example, disabled people with mobility impairments are more likely to be vulnerable to lack of accessible infrastructure;
- The proposed development may either worsen or improve existing disadvantage affecting people who share a protected characteristic. For example, disabled people have higher rates of unemployment. This could be reduced by more inclusive employment practices; and
- Groups with protected characteristics who may not have an equal share in the benefits or social outcomes of the proposed development. This can be either due to direct or indirect discrimination associated with barriers to participation where appropriate mitigations or actions have not been included to overcome such barriers. For example, not overcoming barriers to participation due to lack of privacy in changing rooms or toilets may indirectly discriminate against groups such as women and girls, trans people and ethnic minority groups.

2.7 Some protected characteristics groups experience barriers that may result in disproportionately low participation in public life and activities. These barriers may result in discrimination or disadvantage where appropriate mitigation or actions are not developed to overcome barriers.

For this assessment, the following definitions apply:

- **Participation:** HWFSAC will be a place for outdoor activity, nature based learning, skills and training, employment and volunteering opportunities. Therefore, the assessment has considered participation in terms of physical activity, access to nature and skills, employment and education.
- **Barriers:** includes visible barriers such as inadequate provision of accessible infrastructure for mobility impaired people or invisible barriers such as lack of facilities for cultural and gender based needs such as separate/private toilet and changing facilities, specific catering needs or hidden impairments such as neurodiversity etc.

- 2.8 In some cases, groups may be subject to both differential and disproportionate impacts (for example, disabled people will be a main user group of HWSFAC but also have specific differential needs in terms of accessibility etc).
- 2.9 It is also important to consider how intersectionality could place groups at potential further disadvantage and what is required to enhance opportunity for these groups. For example, girls from certain ethnic minority or religious groups may have cultural barriers to participation in physical activity including appropriate dress and privacy. When combined with common issues for girls, such as confidence and body image, this may exacerbate barriers. Provision of private changing facilities may help to overcome this barrier to an extent.
- 2.10 The assessment considers the actions the Council is taking or planning to take to mitigate against negative impacts and to support positive outcomes. Further recommendations have been provided against each impact where necessary.

Step 3: Recommendations and conclusions

- 2.11 The final section of this report sets out some recommendations for mitigating against adverse impacts and opportunities for promoting equality outcomes and social benefits of the proposed development. It concludes on how the Council has addressed its obligations to the PSED to date.

3. Legislation, policy and guidance

Introduction

3.1 Figure 3-1 lists some of the key legislation, policy and guidance relevant to the proposed development in the context of equalities and planning for outdoor activity facilities. A summary of key documents used to inform the assessment is set out in the remainder of this section.

Figure 3-1 Legislation and policy context



Key legislation

Equality Act 2010 and the Public Sector Equality Duty

3.2 The Equality Act 2010⁵ is UK legislation protecting the rights of individuals against unlawful discrimination and advancing equal opportunities for all. Section 149 of the Equality Act sets out the Public Sector Equality Duty (PSED) to which the Council, as a public body, is subject in carrying out all its functions. This includes having due regard to the following three aims:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
- Advance equality of opportunity between people who share a protected characteristic and those who do not; and
- Foster good relations between people who share a protected characteristic and those who do not.

⁵ UK Government (2010) Equality Act 2010 <https://www.legislation.gov.uk/ukpga/2010/15/introduction>

- 3.3 The Equality Act 2010 further explains that having due regard for advancing equality involves:
- Removing or minimising disadvantages suffered by people due to their protected characteristics;
 - Taking steps to meet the needs of people from protected groups where these are different from the needs of other people; and
 - Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.
- 3.4 The duty covers the following nine protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation and marriage and civil partnership.
- 3.5 Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status. This means that the first arm of the duty applies to this characteristic, but that the other arms (advancing equality and fostering good relations) do not apply.
- 3.6 Discrimination can include:
- **Direct discrimination** - This means treating one person worse than another person because of a protected characteristic.
 - **Indirect discrimination** - This can happen when an organisation puts a rule or a policy or a way of doing things in place which has a worse impact on someone with a protected characteristic than someone without one. Indirect disability discrimination is unlawful unless the organisation or employer is able to show that there is a good reason for the policy and it is proportionate. This is known as objective justification.

Adjustment for disabled persons

- 3.7 Sections 20 and 21 of the Equality Act place a duty on organisations to take steps to avoid disadvantage for disabled people where a practice of the organisation could place a substantial disadvantage in comparison with persons who are not disabled. This includes removing or altering features arising from the design or construction of a building, exit from or access to a building, and fixtures, fitting, furniture and furnishing of a building.
- 3.8 Adjustments can include changing the way things are done, reviewing and altering policies and routine practices to improve accessibility and reduce discrimination. A failure to comply with the duty can lead to discrimination.

Positive action

- 3.9 Sections 158 and 159 of the Act allow employers to take action to promote equality in the workplace. This may involve treating one group that shares a protected characteristic more favourably than others, where this is a proportionate way to enable or encourage members of that group to:
- Overcome or minimise a disadvantage;
 - Have their different needs met; and
 - Participate in a particular activity.
- 3.10 An organisation must demonstrate that positive action is an appropriate way to achieve one of

these aims and the steps taken have been carefully thought through.

- 3.11 Using positive action in the workplace is voluntary. However, public sector employers can consider using positive action to help them comply with the PSED.

Guidance and best practice

- 3.12 Below sets out some key guidance documents with regards to accessibility and inclusion in relation to outdoor, sports and physical activity.

Building Regulations and Building Standards

- 3.13 The Building Regulations⁶ provide statutory minimum standards for new and adapted design and construction of virtually all buildings. They apply primarily to buildings but include areas that form part of an entrance to a building. The building regulations or standards include technical guidance that identifies minimum standards to ensure a wide range of people can access buildings and their facilities.
- 3.14 A series of Building Standards have been developed for inclusive design. For example:
- BS8300-2:2018 Design of an accessible and inclusive built environment
 - BS 30416 Menstruation, Menstrual Health and Menopause
 - PAS 6463 Design for the Mind. Neurodiversity and the Built Environment
- 3.15 Compliance with the relevant technical guidance will demonstrate that care has been taken to make a development accessible. However, it does not assure compliance with the broader requirements of the Equality Act 2010 which is to consider the overall inclusive access to services, education and employment.

Sport England Accessible and Inclusive Sports Facilities (2024)

- 3.16 Sport England's guidance on accessible and inclusive sports facilities (AISF)⁷ helps users to fulfil their obligations under the Equality Act 2010 by providing a framework for meeting the needs of users, and represents the current standard for creating and maintaining sports facilities that are accessible, inclusive and able to meet the needs diverse communities. It aims to:
- Increase awareness and use of inclusive design principles;
 - Support approaches to design that reduce or remove barriers to help a diverse range of people to become more active; and
 - Encourage best-practice approaches to creating and maintaining well-designed and flexible sports and leisure facilities by promoting user led design and understanding and responding to the needs of the community.
- 3.17 The guidance provides a series of documents on internal areas, external areas, changing and toilet provision, wayfinding and signage, emergency evacuation, consultation and engagement, and operation and management.

⁶ UK Government (2016) The Building Regulations &c. (Amendment) Regulations 2016
<https://www.legislation.gov.uk/uksi/2016/285/introduction/made>

⁷ Sport England (July 2024) Accessible and Inclusive Sports Facilities (<https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/accessible-inclusive>)

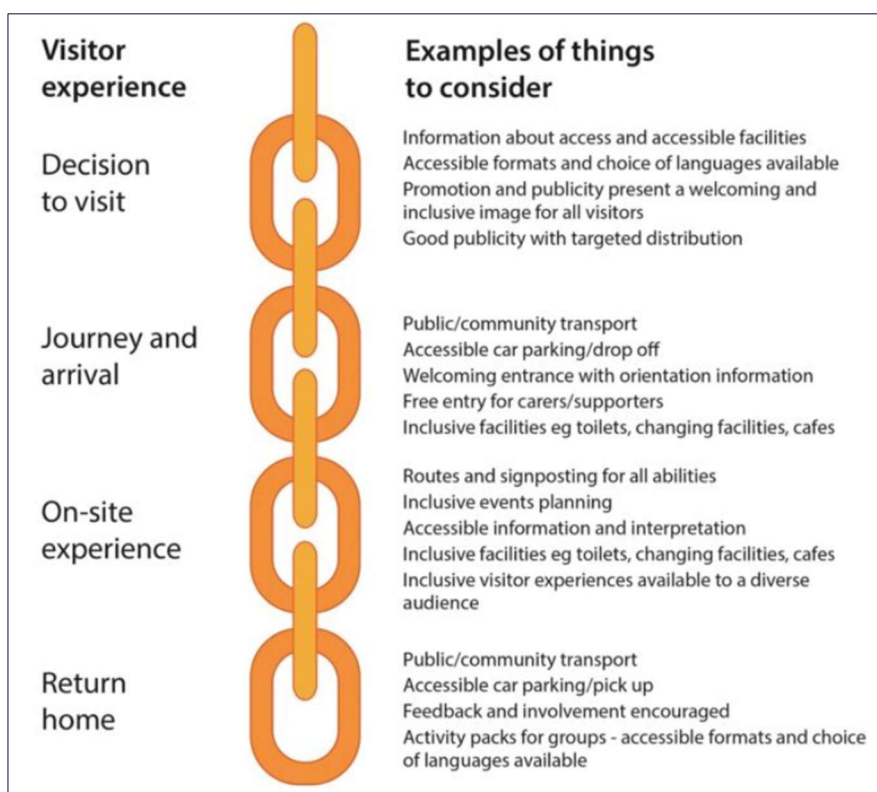
Paths for All - Outdoor Accessibility Guidance

- 3.18 The Paths for All Outdoor Accessibility Guidance⁸ is designed to help make outdoor places and spaces, routes and facilities more accessible, and outdoor experiences more inclusive, so they can be enjoyed by everyone.
- 3.19 The Outdoor Accessibility Guidance is designed as a practical reference for those managing outdoor spaces to create environments that are welcoming and inclusive, promoting participation and enjoyment of the outdoors. It includes techniques, tools and design details to help people meet, and where possible exceed, their legislative duties under the Equality Act 2010. Examples of good practice show how these principles have been implemented on the ground, and signpost to further information and expertise.

Sensory Trust - Access Chain: An Inclusive Design Tool

- 3.20 The Access Chain inclusive design tool⁹ was developed by the Sensory Trust to ensure that access plans and reviews relate to all parts of a visitor experience, not just buildings and infrastructure. The Access Chain (Figure 3-2) recognises that the first step of an inclusive visitor experience is when people make a decision to visit, followed by the journey to a site, the experience itself, and the return home. If any link in the chain is broken then this could negatively impact the overall experience for visitors. The Access Chain can be used for reviewing or planning access and can form a basis for ongoing accessibility audits.

Figure 3-2 The Access Chain: Inclusive Design Tool (Sensory Trust)



⁸ Paths for All and Sensory Trust (April 2023) Outdoor Accessibility Guidance <https://www.pathsforall.org.uk/resources/resource/outdoor-accessibility-guidance-download>

⁹ Sensory Trust – Access Chain <https://www.sensorytrust.org.uk/resources/guidance/access-chain-an-inclusive-design-tool>

Policy and Plans

National Planning Policy Framework

- 3.21 The National Planning Policy Framework (NPPF)¹⁰ outlines how planning policy should help promote healthy and safe communities by taking a positive and collaborative approach to enable development to be brought forward.
- 3.22 Planning policies and decisions should aim to create places which offer opportunities for social interaction and meetings between members of the community. This includes safe and accessible environments which contain social, recreational and cultural facilities and services as well as access to high quality open spaces and opportunities for sport and recreation.
- 3.23 While the NPPF does not contain specific guidance on equalities, it does emphasise the importance of sustainable development and the need to support strong vibrant communities. Planning policies and decisions should support the social, recreational and cultural facilities and services the community needs by:
- Planning positively for the provision and use of shared spaces, community facilities (including meeting places, sports venues, open space) and other local services to enhance the sustainability of communities;
 - Support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community; and
 - Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.

Sport England 'Uniting the Movement' Strategy 2021-2031

- 3.24 Sport England's Uniting the Movement Strategy¹¹ sets out the vision, mission, and strategy for becoming a nation of more equal, inclusive, and connected communities where people live happier, healthier, and more fulfilled lives. Sport England's mission is to invest in sport and physical activity to make it a normal part of life for everyone in England.
- 3.25 The strategy aims to tackle deep-rooted inequalities in sport and physical activity which excludes people from being active because the right options and opportunities are not available. This includes:
- Disabled people and those with a long-term health condition - who are twice as likely to be physically inactive;
 - Women - who are less active than men, with the gender gap starting at a very young age; and
 - People from Asian and Black backgrounds - who are far more likely to be physically inactive than people who are White.

London Plan (March 2021)

- 3.26 The London Plan Policy GG1 ('Building Strong and Inclusive Communities') seeks to provide access to good quality community services that accommodate and strengthen communities,

¹⁰ Ministry of Housing, Communities and Local Government (Dec 2024) National Planning Policy Framework <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

¹¹ Sport England (Jan 2021) Uniting the Movement Strategy <https://www.sportengland.org/about-us/uniting-movement>

increasing active participation and social integration, and addressing social isolation. The policy promotes development where all Londoners including children, young people and disabled people can move around with ease and enjoy equal opportunities – minimising barriers.

- 3.27 Policy GG3 ('Creating a Healthy City') supports more active and healthy lives for Londoners to enable them to make healthy choices including improved access to and quality of green spaces, the provision of new green infrastructure, and spaces for play, recreation and sports.

Hillingdon Equality Commitment and Objectives

- 3.28 The Council is committed to promoting equality of opportunity, celebrating and valuing diversity, eliminating unlawful discrimination, harassment and victimisation, and promoting good relations. The Council sets out the following aims¹²:

- Create a strong and resilient community in Hillingdon;
- Counter extremism and hate in all its forms;
- Bring communities together to promote cohesion and integration; and
- Build a strong sense of belonging and pride where all people in Hillingdon feel valued and included, whether living, working within, or visiting the borough.

¹² <https://www.hillingdon.gov.uk/article/11543/Our-commitment>

4. The proposed development

Introduction

- 4.1 This section sets out details of the proposed development based on the Planning (Pre-) application Design Strategy Document 1329_D006 as well as other information gathered through meetings with the Council's capital programme team and architects (Haverstock).
- 4.2 Details of the existing site at HOAC and Broadwater Lake have also been included. This is to help compare existing facilities with those included in the proposed development and therefore, understand the impact of the change.

Existing sites

HOAC

- 4.3 HOAC provided the local community and visitors with access to a range of land and water based activities and outdoor education. Priority was given to young people and those who are disadvantaged or disabled. The majority of HOAC users were local schools, colleges, community groups and businesses.
- 4.4 The facilities at HOAC were added over a number of years. Many of the facilities were not compliant with modern relevant building standards nor adhered to requirements of the Equality Act 2010. Improvements were needed to provide a more inclusive environment for protected characteristic groups. Summary of issues with facilities at HOAC include:
- **Accessibility** - the site failed to provide adequate provision for disabled people. There was a single accessible WC unit on site. Generally across the site, rooms and outdoor spaces did not have a level means of access (See Figure 4-1). Outside spaces were often used as makeshift disabled changing spaces.
 - **Seasonal accommodation** - this was formed of four caravans dotted around the site (see Figure 4-2), serving instructors who are normally young people from 16 years of age. Each caravan shared WC facilities which limited gender splits and flexibility. No accessible facilities for wheelchairs was provided.
 - **Communal space** - the largest internal congregation space was undersized for the largest group numbers that HOAC accommodated on site. This had potentially health and safety implications for briefings and other activities.
 - **Changing rooms** - based on modern standards (Sport England guidance) the size of the changing rooms was considered undersized to adequately accommodate a group of 30 students (see Figure 4-3).
 - **Toilets** (see Figure 4-4) - there was a lack of flexibility of toilet and changing facilities with regards to gender and age. The site had an under provision of staff and public toilets at peak times.
 - **Storage facilities** - there was no single storage unit and equipment storage was separated based on equipment type.
 - **Staff, adult and supervisor facilities** – these were difficult to identify for new users.

Figure 4-1 Inaccessible landscaping at HOAC



Figure 4-2 Seasonal worker accommodation



Figure 4-3 Changing rooms at HOAC



Figure 4-4 Toilets at HOAC site



Broadwater Lake

- 4.5 The site of the proposed development is at Broadwater Lake, Harefield (Figure 4-5). The lake is the largest of four lakes within the Mid Colne Valley Site of Special Scientific Interest (SSSI). The site is bound by the River Colne to the west and the Grand Union Canal to the east. The area within the redline boundary extends to 79.95 hectares.
- 4.6 The neighbourhood of South Harefield lies to the east of the site, immediately beyond the canal. The village of Denham and its rail station and bus services is located within walking distance to the southwest of the site. There are four residential properties located along the existing access road including a small Gypsy Roma Traveller community.
- 4.7 The site has a relatively low Public Transport Accessibility Level (PTAL). The nearest train station is 1km away at Denham, with Tube stations at West Ruislip and Northwood Hills. The 331 bus runs every 20 minutes in the daytime and every 30 minutes in the evening. It serves bus stops on Moorhill Road near the entrance of the site's access road. The site is close to the Grand Union Canal tow path, with a journey of approximately 20 mins from Uxbridge Civic Centre to the site by bike.

Broadwater Sailing Club

- 4.8 The northern half of the lake is used by Broadwater Sailing Club which has approximately 180 members. The club has a clubhouse with crew room, kitchen, toilets and changing facilities located on the northern bank of the lake.
- 4.9 None of the current buildings and facilities at the sailing club are accessible. The current facilities need improvement, with better connection to a covered outdoor space to support year-round events. Buildings need to be upgraded for better energy efficiency and to reduce ongoing operational costs.
- 4.10 There are five storage containers for safety boats and maintenance kit storage on site. However, these are considered to be inadequate and not suitable for effective maintenance and repairs.

Gerards Cross Angling Society

- 4.11 The lake is also used by Gerrards Cross and Uxbridge Angling Society. There are currently no toilets or facilities for anglers. Pedestrian routes to the lake are not accessible.

Figure 4-5 Existing Broadwater Lake site layout



User group requirements

- 4.12 HWSFAC will provide land and water based activities and overnight accommodation facilities for a diverse range of user groups, but predominantly serve children, young people and their families. Therefore, engagement has been undertaken with end-user organisations to determine needs and inform requirements for the proposed development. Table 4-1 sets out the user groups identified for HWSFAC along with a description of needs.

Table 4-1 Potential User Groups of HWSFAC

User Group	Description of Needs
School groups	School groups for both day trips and overnight stays. Aged from 6 years old. They will come with teachers and parents/carers and could have a variety of physical and mental needs. In addition, different school groups, with children of different ages, abilities, genders and religions could all be using the site concurrently. Generally, these groups will visit the site for a single time, so the site needs to be readable to new users. Small school groups, including children from challenging backgrounds, may visit the site regularly.
Scout and Girl Guide groups	Scout and Girl Guide groups will use the site, often in large numbers of up to 200 people at one time. They may visit for either day or overnight stays. Their gender and age split may be one sided or mixed.
Cadets	Typically, these users may be using the site in colder weather when other groups will not be present. Sea cadets include children aged 10 and army and air cadets are aged 12 and above.
Children, young people and adults with additional needs	Children, young people and adults with additional needs, including those with autism, multiple learning disabilities and/or physical impairments. The people need to be able to use all the same facilities as their non-disabled peers.
Sailing Club members	Will require frequent access and use of the facility throughout the year. This will include use of the storage, workshop and changing facilities during training and maintenance periods, as well as an observation room to allow families to gather during both training sessions and races.
Families	Will access facilities at weekends and during summer holidays. Children may be accompanied by their parents, who could have other children with them of different ages. Families will need to change together, and consideration is given to how these changing rooms can be accessible and comfortable for different needs.
Ecologists	The building needs to operate as a Field Study Centre as part of the Field Studies Council national offering. This will allow those training as ecologists to study together, and the site will benefit from this greater understanding throughout the site's use.
Permanent Staff	The use of the building by staff is also a consideration, and how it can best perform as an exemplary workspace. This will include staff employed by the Council or Service Providers and therefore the need to also consider employment law with regards to Equality Act 2010.
User group staff	Staff belonging to user-groups. These staff may visit regularly or visit on one occasion.
Seasonal live-in staff/those in training	Seasonal, overnight staff form a large part of the operational staff on the site during peak times. These positions are often taken up by young people training to become professional activity instructors. Staff will require basic accommodation, access to food preparation, private living space and their own shower facilities. Some of these users may be aged 16 and safeguarding is a consideration.
Anglers	A local angling club currently uses the lake, however due to nature of fish present, it is seen as more suitable for experienced anglers. WC and basic tea facilities are required to encourage different users to access the site, particularly children and young people.

4.13 Further feedback from end-user engagement highlighted the following issues with existing local outdoor activity centres:

- **Sanitation facilities** - the lack of accessible toilet, changing and shower facilities at existing local centres were highlighted. A higher number of accessible facilities for users including families and disabled people are required including disabled changing, toilet and shower facilities.
- **Staff/Volunteer facilities** - General lack of dedicated staff/volunteer spaces was noted within existing facilities. End-users would like to see separate facilities for staff including a staff room and tea and coffee spaces for volunteers.
- **Sleeping accommodation** - this was partially separated from the main space by a temporary screen at one existing site which could pose a safeguarding risk. Issues also arise when children go to bed at different times as noise can disrupt individuals.
- **Storage** - A lack of storage space and location and security of storage were identified as issues. There is a need for storage for equipment such as ropes, boards, slings, katakanu seats, paddles. This should be easily accessible from the lake side. One end-user noted that a storage area for 150+ buoyancy aids, for disabled/wheelchair access was required, and should be located near a covered area, enroute from disability parking, so that disabled people are wearing buoyancy aids by the time they reach the main shelter.
- **Drop off and parking facilities** - drop-off for school groups is not secure on existing sites. Coach drop off and pick up can often be a distance from the main building and there are steps that need to be negotiated on the route to the facilities. Suggested requirements for the disabled parking included an area close to operation zone sufficient to accommodate 4 x mini-buses and 4 x cars. There is a need for adequate car parking and cycle racks for volunteers at general car park (estimate of up to 15 volunteers per day).
- **Shelters** - there is a need for covered shelters for wheelchairs and other users. These should be ideally located away from the main hub of activities due to neurodiversity of some users but close to pontoons and other facilities used by disabled people. There is also a requirement for a covered area with a view of lake, for seating of carers etc.
- **Pontoons** - a need for two pontoons to allow sufficient space for wheelchair users and allocated shore space for 14 access dinghies and 3 katanus and 2 lifting hoists. One hoist to have sufficient reach to centre of katanu (1.5 metres).
- **Kitchen facilities** - size of existing kitchen facilities are not sufficient to cater for the number of children and volunteers. Separate kitchen space is needed for the storage preparation and cleaning of feeding tubes, medical storage fridge and oxygen cylinder storage. Separate kitchen food preparation and disposal storage space is also required for preparing food where allergies may be a life threatening concern. Some children may also require a separate space for eating meals.
- **Medical facilities** – it was noted that existing sites health care professionals are required on site at all times to administer medicines and deal with any healthcare emergencies. These staff are also present overnight. They require good quality sleep to avoid accidents and should not sleep in the main dorms, for this reason. Secure medical storage locker required, as well as a small (under counter) medical fridge.
- **Laundry facilities** - there is a need for laundry storage for off-site cleaning. Medical waste disposal, sharps etc.

- **Informal spaces** - there is a lack of outdoor space for the children to use at existing facilities. User groups would like more sensory spaces – these have been constructed but are not always in the best location within existing centres.
- **Other** - there is a requirement for Wifi and a screen for movie nights at campsite and in main building.

The proposed development

Overview and briefing considerations

- 4.14 The proposed development will replace facilities at HOAC whilst aiming to provide an exemplary space for disabled people. Inclusive design lies at the core of the project and designers are following legislation and relevant guidance to support inclusive and accessible design including:
- BS8300-2:2018 Design of an accessible and inclusive built environment;
 - Sport England Accessible and inclusive sports facilities (AISF) guide;
 - PAS 6463 Design for the Mind. Neurodiversity and the Built Environment; and
 - BS 30416 Menstruation, Menstrual Health and Menopause.
- 4.15 HWSFAC will be operated by the Council and Service Providers, including contractors and charities.
- 4.16 The proposed development will need to provide flexible, practical, accessible and safe spaces for activities, camping accommodation, staff accommodation, toilets, changing spaces, showers, food preparation and storage, medical support, storage of medical supplies, learning and training, quiet/reflective time and storage of equipment. In designing the proposed development, the design team has been required to consider relevant guidance and the above feedback from end-user groups. The overall requirements of the proposed development include:
- The ability to offer a wide range of both water-based and land activities that can be used by all. Also, to accommodate the sailing club and angling club, providing facilities to encourage younger members.
 - Capacity to accommodate a variety of users, in various group sizes (of up to 200), at any one time. The centre may be used by one group such as girl guides, meaning that facilities also need to be adaptable to the needs of larger groups with similar demographics. Alternatively, the range and number of facilities needs to be adequate to accommodate multiple groups to use the centre at the same time. These groups may have differing needs and abilities and need to use the centre independently from each other.
 - The building must stand the test of time and consideration given to robustness, flexibility and maintenance. There is a need to maximise availability of facilities and minimise costs and loss of time due to maintenance.
 - Flexibility is required in the allocation of spaces, and in how they are built. This strategy will safeguard against further development of the site in the future, as users can re-plan the buildings to suit evolving requirements within the existing footprint.
 - The structure of the buildings will need to be strong enough for lifting cranes or other equipment for disabled people, and support the loads created by modern powered wheelchairs. In addition, the construction of the buildings is required to be low

maintenance, so that it can operate efficiently without passing on high costs to end-user groups. Adequate power supplies and charging facilities are needed for equipment, emergency call alarm systems and lighting.

- The site must be easily accessible for vehicles including mini-buses, coaches and specialist transport for disabled people.
- Private, accessible space is needed for staff, including sleeping accommodation for seasonal workers and health care professionals, kitchen and living space. This should be separate to that of staff and carers of groups. In turn, private spaces for staff and other adults accompanying groups need private facilities for rest and refreshment away from children.
- Commercial sized kitchen to accommodate group staying for an extended period (up to one week). There is also a requirement for additional sufficient food and drink preparation and storage areas to allow for use by different groups as well as allowing for separate areas for specific dietary needs such as preparation and storage of halal and kosher diets and people with nut allergies etc. This should also include storage of tube feeding for disabled people which must be stored and prepared, cleaned or disposed of separately from other food storage.
- Storage facilities required for oxygen cylinders, medical equipment and medicines. Space also needs to be provided for administering first aid and medical care as well as dignified disposal of equipment. The proposed development should also take into account the needs for assistance animals.
- The ability for the buildings and site to promote local ecology through its use as an ecology field studies centre, and with activities for young people aimed at promoting care of the environment and the improvement of the SSSI. Also need to incorporate the existing industrial heritage of the site where possible, such as the Weigh Bridge at the entry to the site.
- Ensure the safeguarding and protection of children and vulnerable people (the NSPCC are currently undertaking a safeguarding assessment for the proposed development).

Description of buildings

Operation zone

4.17 The operation zone will be the site's main building. The building is designed to be two storeys, and robust enough to support heavy electric wheelchairs on both floors. Two lifts are proposed between the floors as well as a stairwell. Lifts will be long enough to accommodate a horizontal wheelchair, so that all wheelchair users can access the first floor and outside deck. A fire safety lift will be used so that it possible to evacuate people in a fire or emergency event. Within the main reception, a hearing loop will be installed. Hearing loops will be included in the main reception and other areas of the site where required. This building includes:

- **On the ground floor:** the main operational spaces, including the main office, toilets and changing facilities for users, family change, single sex spaces, one person changing spaces, changing rooms that can be either female or male and be flexible a kitchen, first aid/medical treatment room, and a larger congregation space which can host a range of functions depending on the users present and changing weather conditions. The operation zone provides camping facilities for indoor and specialist outdoor camping.
- **On the first floor:**

- Part One: 15 season worker accommodation cabins with shower rooms, staff lounge and dining rooms and accessible toilets. Three of the worker accommodation cabins are accessible with people with physical impairments, and can be adapted.
- Part Two: Public Toilets, training room, observation room, pantry and storage areas are also located on this floor.

- 4.18 The operation zone includes private areas for staff travelling with groups to have separate space for breaks etc. without needing to use staff accommodation.
- 4.19 There is allowance for baby feeding spaces around the main building including quiet seating zones of varying degrees of privacy. These zones also intended to serve neuro-divergent users, particularly the listening deck within the Operation Zone. Located on the first floor, this space is at tree canopy height, out of the way of high traffic spaces, but overlooked to allow for passive supervision.

The safety zone

- 4.20 The safety zone is located opposite the main building and is on one level. This holds the equipment and spaces required for the site to function safely and efficiently, including safety boats, buoyancy aids and equipment storage. This will be wheelchair accessible and has accessible toilet facilities. The zone will also be designed to be safe for children. The safety zone will also include a garden area, providing a quiet space for neurodivergent people and those who need a retreat from sensory overload.

The workshop zone

- 4.21 The workshop zone will be adults only to avoid any harm to children and vulnerable adults. This contains equipment for maintaining boats, servicing and maintenance area and the site ground maintenance. Also, includes utility service area such as battery storage and high voltage electricity.

The camp zone

- 4.22 The camp zone is the smallest building and located furthest south in the site, close to the campsite and outdoor activities. A covered activity shelter allows groups to congregate safely, while a food preparation area, toilet and changing facilities allow groups to operate self-sufficiently short term from the campsite. The shelter also provides space for emergency mustering, especially at night.

Activity shelters

- 4.23 A small number of activity shelters are allocated across the site. Their form varies in size and construction – from two sided, covered roof shelters to sail shades sitting under tree canopies. These shelters allow small groups to gather before activity briefing or during meal times. Offer shade and protection from rain, an essential requirement to protect children and those who cannot easily move. Out of season, some of these shelters will provide shelter for equipment.

Land and water based activities

- 4.24 A variety of water activities will take place on site including sailing, canoeing, kayaking and katakuning, paddleboarding, windsurfing, dragon boating and boating for nature watching. Pontoons are being designed to be stable and wide enough to support a wheelchair with lifting hoists to get people in and out of boats when required.
- 4.25 The land within the peninsula site has the potential to accommodate several land activities, including camping, ropes course, archery, pedal karting, zip-lining, low ropes course, above

ground caving and angling platforms for children.

- 4.26 All of the above activities have been selected and designed so that they can be accessible to all groups. Activities deemed to be non-accessible for certain groups have not been included in designs.

Staff accommodation

- 4.27 The proposed development includes a main office for use by staff as well as private staff living accommodation. This includes 15 cabins with shower rooms for live-in seasonal workers for seasonal workers. Three of the 15 cabins are designed to be accessible to those with physical impairments. The building also includes both dining and lounge spaces able to accommodate all employees at the same time.

Education and learning

- 4.28 The proposed development will act as an Ecology Field Studies Centre for visiting groups. Specific water and land activities will be available and environmental and ecology education for children, including pond dipping, bird watching and tree observation and study.
- 4.29 Seasonal workers will be able to learn leadership skills and gain qualifications, and there is also opportunity for vocational training, experience building and development and apprenticeships.
- 4.30 There will also be potential for informal learning and volunteering opportunities to support in the development of life skills and confidence building.

Overnight accommodation

- 4.31 The design includes overnight camping facilities. This has been designed to accommodate children with a variety of needs across three camping zones. A three tier approach to the types of users who could access and use the camping accommodation, depending on their needs:
- **Tier 1** - accessible camping provided in a safely controlled internal space. Users will need full size beds and may require medical treatment, sanitation, changing places, lifting equipment, medical and health care supervision (with separate sleeping accommodation), oxygen tanks and peg feeding. Temperature control and security are also considerations.
 - **Tier 2** - designed for children who may have some additional needs but can camp and sleep outdoors, albeit undercover or in a controlled environment. Examples of this could be children with allergies or those with social, emotional and mental health needs (SEMH). Supervision is a consideration, as well as close access to medical spaces. Also provide sheltered outdoor camping that requires power and lighting, for example drug pumps, or nebulisers. Stable floor for a specialist bed. The accommodation is being designed to be away from main buildings to permit children to be able to see the night sky on clear nights.
 - **Tier 3** - children will camp in tents and other temporary accommodation. Artificial lighting will be minimal, but they will still require close by sanitary provision, as well as a congregation space (which may include power and lighting) in event of emergency.

Changing and toilet facilities

- 4.32 Table 4-2 sets out the breakdown of toilet and changing facilities across the different zones. The site will have three Changing Places and accessible toilets within all buildings (and both floors of the operations zone), showers and changing rooms for independent users, and family changing rooms. The latter will include lower height pans, space for buggies and baby change facilities.

Table 4-2 Breakdown of proposed changing spaces and toilet provision

Changing/Toilet/Shower facilities	Operations Zone (Ground Floor)	Operations Zone (First Floor) ¹³	Safety Zone	Camping Zone
Toilets	20	4		10
Accessible toilets	1	2 (1 with baby change)	2 (with changing bench)	1 (with baby change)
SuperLoo	6			2
Changing Places room	1		1	1
Large changing rooms (30 people)	4			2
Family change	2			1
Accessible change (with shower and toilet)	1			1
Individual shower cubicles	8			4

4.33 The term ‘SuperLoo’ describes cubicle spaces which allow for which allow for toilet, sink, shelf and ambulant handrails - to provide an inclusive space for users who are menstruating, changing stoma bags or have any access requirements other than a wheelchair (dexterity, visual impairment). SuperLoos will generally be located near to banks of standard toilet facilities, to allow for inclusive and discreet use. These have been successfully implemented at used at Ruislip Lido¹⁴.

Transport, parking and wayfinding

4.34 Due to the location of the site it is likely that most visitors, will arrive by car, minibus or coach, and use the coach drop off and car parking has been provided on site. Trolleys will be used for moving equipment from the car park to the centre of the site (see Figure 4-6).

4.35 Disabled parking and parking for ambulances to transport disabled people has been included outside of the main operations zone to allow easy access to the main entrance. Special land buggies are being proposed for the proposed development to allow wheelchair users to safely access parts of the site which mostly flat throughout. Facilities for charging electric wheelchairs and mobility scooters will be provided.

4.36 Clear signage, adhering to Sport England guidance, will form an integrated part of the design, both internally and externally. The main office is located as a clear signpost at the centre of the site.

4.37 Harefield Narrow Boats would potentially be able to collect and deliver from the adjacent canal towpath. Making the entire canal park of the adventure activities with no walking involved.

¹³ Excludes staff accommodation

¹⁴ <https://planning.hillingdon.gov.uk/OcellaWeb/showDocuments?reference=78998/APP/2024/2281&module=pl>

Figure 4-6 Example of trollies used to move equipment



- 4.38 Pedestrian and bike access will be provided from Moorhall Road on a pavement protected from lorries, coaches and cars. Alternatively the Grand Union canal towpath also has access for bicycles. Cycle parking is included in plans including charging for e-bikes.

Facilities for Gerrards Cross and Uxbridge Angling Society

- 4.39 Improved fishing and angling facilities are a requirement which will also accommodate the existing club that currently uses the lake. Toilet and basic drink making facilities are required to encourage different users to access the site, particularly children and young people.

5. Consultation and engagement

Introduction

- 5.1 The Equality Act 2010 emphasises the importance of supporting positive relations between different groups. Local policy promotes resident engagement, supporting all residents across the borough in their ability to have equal access to information, advice and services and to play an active role in resilient and respectful communities. User consultation and engagement plays an important role in gathering information at all stages of a project. Involving end-users in the design and development process helps to achieve inclusive facilities that work for everyone¹⁵.
- 5.2 Below summarises engagement undertaken to date on the proposed development. This demonstrates the extent to which inclusive processes have been used and the views of under-represented/vulnerable groups has been sought. It also identifies key feedback relevant to protected characteristics groups.

Stakeholder engagement

- 5.3 Officers supported early engagement with Natural England and pre-submission discussions with Canal and River Trust, Greater London Authority (GLA), Wildlife Trust (WLT) and the Environment Agency. Consultation sessions have also been held with Natural England and the Environment Agency, as it was recognised that comments received on the previous design were subject to revision based on the new proposals.

Public engagement

- 5.4 A public exhibition was held in February 2023 at Harefield Library. Prior to the exhibition, leaflets were distributed to 25 properties that lie immediately adjacent to the site. These leaflets provided initial information about the proposals, details of the exhibition venue, and contact details to enable people to get in touch before or after the exhibition.
- 5.5 Council and project team representatives (covering specialist areas including planning, transport, landscaping and architecture) attended the exhibition to answer questions. Attendees were encouraged to provide comments and suggestions on the proposals and raise issues which they felt should be given further consideration ahead of the application. Comment forms were available to be completed at the exhibition or returned at a later date by email.
- 5.6 Positive feedback was received from the public in relation to the provision of outdoor activities for children, young people and disabled people. Some concerns were raised with regard to the traffic junction between Moorhall Road and the access road for the proposed development. Pedestrian access on Moorhall Road was also identified as a potential issue.

User group engagement

- 5.7 Several potential end-user groups were engaged between April and August 2024 to assist in understanding the requirements and the preparation of designs. This involved site visits to existing centres and showing emerging proposals to user groups. Information provided has been used to develop the design proposals and inform the project requirements as set out in section 4.

¹⁵ Sport England (2023) Accessible and Inclusive Sports Facilities <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/accessible-inclusive>

6. Evidence

Introduction

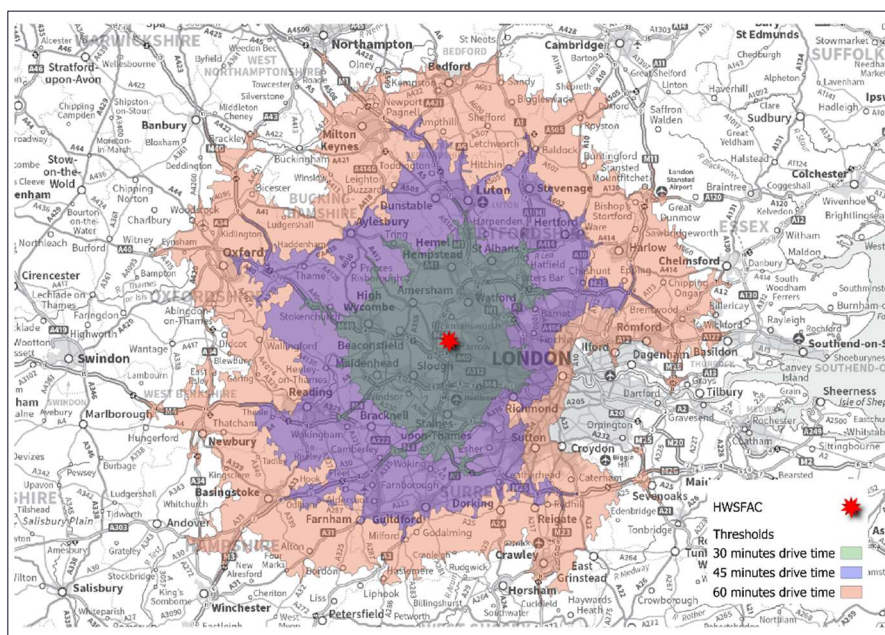
6.1 This section sets out a summary of the key evidence to support the assessment. It includes:

- An overview of equality issues and protected characteristic groups in Hillingdon and the wider catchment area of the proposed development. The baseline equalities data compares Hillingdon with Greater London and England levels to help identify how disproportionate impacts might apply; and
- Evidence gathered from a literature review associated with the different needs and barriers to participation for each of the protected characteristic groups.

Study area

6.2 The proposed development is located in the London Borough of Hillingdon. The wider catchment area defined by 30, 45 and 60 minute drive time thresholds¹⁶ is shown in Figure 6-1.

Figure 6-1 Drive time catchment areas for the proposed development



Contains OS data © Crown Copyright 2025

Deprivation

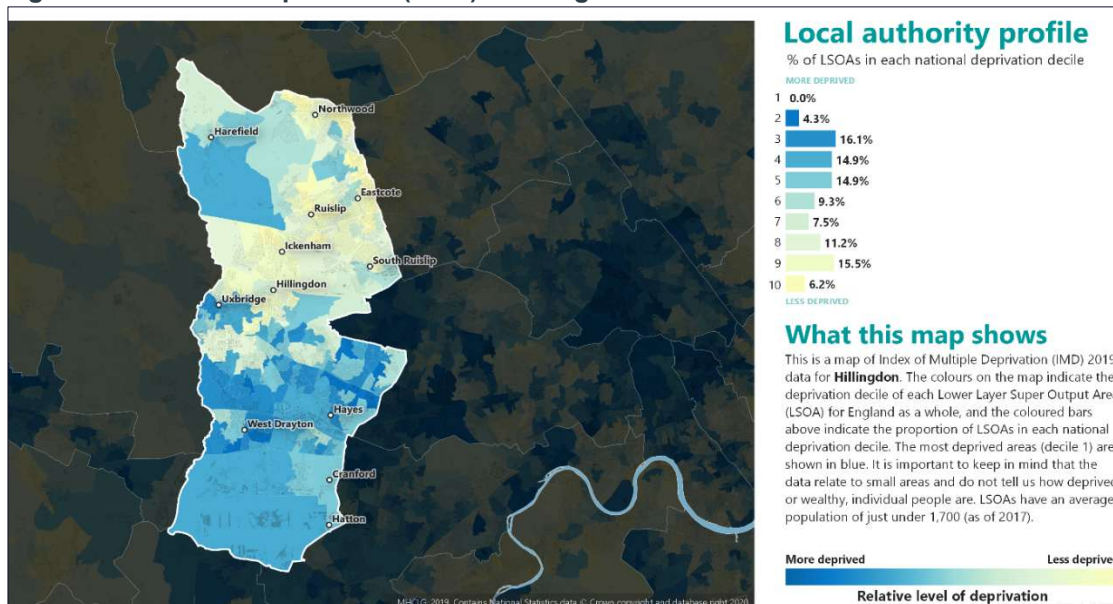
6.3 Deprivation is measured by the 2019 English Indices of Deprivation. This provides an overall deprivation score for Lower Super Output Areas (LSOAs) across England, building on 7 'domains' of deprivation. These domains include health, income, employment, education, crime, barriers to housing and services, and living environment. These are the key indicators which influence the level of deprivation within an area.

6.4 These indicators provide a measure of 'relative deprivation', not affluence. As such, it is important to recognise that not every person living in a deprived area will be deprived themselves and likewise, there will be some deprived people living in the least deprived areas.

¹⁶ Drive-time isochrones based on travel time using HWSFAC as the destination point (Openroute Services plugin using QGIS)

- 6.5 Overall deprivation within Hillingdon varies significantly, as shown in Figure 6-2. No LSOAs within Hillingdon are within the 10% most deprived nationally for overall deprivation. However, 7 out of 161 LSOAs rank in the 20% most deprived nationally. Yeading Ward has the most deprived LSOA in the district. This ward also includes LSOAs within the most deprived 10% for income (including income deprivation affecting children index) and barriers to services.

Figure 6-2 Index of Deprivation (2019) – Hillingdon LSOAs



Health and wellbeing

- 6.6 The Hillingdon Joint Strategic Needs Assessment shows that overall, people in Hillingdon are relatively healthy in comparison to England as a whole. Census 2021 data shows that 85.2% of Hillingdon residents stated that they were in 'good' or 'very good health' compared to 82.2% nationally.
- 6.7 Annual personal wellbeing data shows that Hillingdon scores better on average than national rates in 'life satisfaction', 'happiness', 'anxiety' and 'for the feeling that things done in life are worthwhile'¹⁷.
- 6.8 The average life expectancy for both men and women in Hillingdon is higher than the average for England and is on a par with London averages. Women in Hillingdon have a life expectancy at birth of 84 years, and for men this is 80.4 years. However, life expectancy is 7.2 years lower for men and 5.5 years lower for women in the most deprived areas of Hillingdon than in the least deprived areas¹⁸. The number of years people live healthy lives without the onset of disease is also important. Men in Hillingdon have a healthy life expectancy at birth of 62 years, slightly below the England average of 63 years. Women in Hillingdon have a healthy life expectancy at birth of 60 years, below the England average of 64 years.
- 6.9 Levels of physical activity for children (44%) and adults (56.5%) in Hillingdon are lower than national averages. Those from the least affluent families are the least likely to be active¹⁹. Children who are more likely to be obese include ethnic minority groups, boys, and those children with parents who are overweight or obese.

¹⁷ ONS (2023) Annual Population Survey

<https://www.ons.gov.uk/peoplepopulationandcommunity/wellbeing/datasets/headlineestimatesofpersonalwellbeing>

¹⁸ <https://www.nwlondonicb.nhs.uk/about-us/who-are-we/health-north-west-london>

¹⁹ <https://www.sportengland.org/research-and-data/data/active-lives>

Employment and skills

6.10 Latest unemployment rates for Hillingdon show that 4.7% of 16-64 year olds are unemployed, lower than London but higher than national rates (Table 6-1). January 2025 claimant rates show that 6% of 18-24 year old claim benefits compared with 5.5% of the overall working age population.

Table 6-1 Claimant count by age (not seasonally adjusted - February 2025)

Age group	Hillingdon	Great Britain
Aged 16-64	5.5%	4.3%
Aged 16-17	0.1%	0.2%
Aged 18-24	6.0%	5.6%
Aged 25-49	6.0%	4.8%
Aged 50+	5.0%	3.2%

Source: ONS Claimant counts by sex and age

6.11 Hillingdon has a lower percentage of economically inactive population (16.3%) than London or nationally. Economically inactive people receive the least proactive support to move into employment but 70% of them would take a job that aligned to their skills, interests and circumstances²⁰. Those who need most help in getting into work include:

- Those currently economically inactive due to ill-health or disability or caring responsibilities;
- Young adults with low qualifications at risk of not entering the labour market or young adults with poor health at risk of not entering the labour market.

Education and training

6.12 Within Hillingdon, there are 114 schools serving 24,343 pupils²¹. Table 6-2 provides a breakdown of the number of schools and school pupils within selected drive time thresholds of the site²². This shows that 17% of schools (and 21.4% of all school pupils) in England are located within a 60-minute drive of the proposed development²³.

Table 6-2 England and Wales schools and pupils within drive-time catchment of HWSFAC

Drive time	Schools	Pupils	% of all pupils
30mins	1,200	530,961	6%
45mins	2,970	1,221,915	13.8%
60mins	4,974	1,990,293	22.6%

²⁰ Department for Work and Pensions (March 2025) Keep Britain working Review: Discovery
<https://www.gov.uk/government/publications/keep-britain-working-review-discovery/keep-britain-working-review-discovery>

²¹ Department for Education (2025) Get information about schools <https://get-information-schools.service.gov.uk/>

²² Based on Openroute Service isochrones as set out in Figure 6-1

²³ Based on all schools classified as 'open' as of June 2025 within the 'get information about schools establishment database' includes number of pupils stated within database.

- 6.13 Education and training have a significant impact on inequalities, with educational achievement affecting job opportunities, income and housing and life expectancy.
- 6.14 Hillingdon has higher educational outcomes than for national averages. However, there are inequalities with regards to educational outcomes across different groups with those from disadvantaged groups, SEN pupils and Black Caribbean pupils all progressing worse than expected. Table 6-3 sets out the attainment, gaps and progress for key groups in Hillingdon. Progress score is a measure of whether pupils have met expected progress based on their earliest baseline assessments.

Table 6-3 Educational attainment, gaps and progress for key groups in Hillingdon²⁴

Pupil Group	Attainment, gap and progress score: LBH group and LBH non-disadvantaged white British pupils							
	EY		KS2			KS4		
	2023	Gap %	2023	Gap %	Progress score	2023	Gap %	Progress score
National-all pupils	67.2	0	60.00	0.00		64	0	
London-all pupils	69.1	1.9	67	7		71.2	7.2	
Hillingdon-all pupils	68.7	1.5	62.00	2.00	0.8	70.1	6.1	0.25
LBH Non-Disadvantaged	73	0	68	0	1.4	76	0	0.42
LBH Disadvantaged	53.4	-19.6	46	-18	-0.7	54	-18	-0.2
LBH SEN Support	24.9	-48.1	26	-42	-0.4	34	-42	-0.26
LBH SEN EHCP	3.7	-69.3	10	-58	-3.5	11	-65	-0.98
LBH Black Caribbean	n/a	n/a	45	-23	-1.2	56	-20	-0.29
LBH White	67.9	-3.1	57	-11	0.2	63	-13	-0.17

- 6.15 Hillingdon has a relatively lower level of apprentice achievement outcomes, with a rate of 673 per 100,000 population apprenticeships started by adults aged 16 years + compared to an average of 952 nationally (for full academic years 2018/19 to 2023/24)²⁵. Apprenticeship achievements were also lower at 342 per 100,000 of the population compared with 492 nationally.

²⁴ London Borough of Hillingdon (2025) Hillingdon Education Strategy 2025-2030 <https://leap.hillingdon.gov.uk/article/6940/Education-Strategy-2025-30>

²⁵ Department for Education (2024) Further Education and Skills <https://explore-education-statistics.service.gov.uk/find-statistics/further-education-and-skills/2024-25>

Protected characteristic groups

Age

- 6.16 Table 6-4 shows that Hillingdon has a higher percentage of children and young people than for London and England. The population aged 65 years and over is much lower than England levels but higher than London.

Table 6-4 Hillingdon population breakdown by age (Census 2021)

Age group	Hillingdon	London	England
Children (0-17 years)	23.2%	21.4%	20.7%
Young People (18-24 years)	8.9%	8.8%	8.3%
Older People (65+ years)	13.4%	11.9%	18.3%

Key issues and barriers to participation for children and young people:

- 6.17 Levels of physical activity are relatively low amongst children and young people in Hillingdon in comparison to national rates. According to the Active Lives Survey²⁶, around 1 in 3 children and young people are not meeting daily physical activity guidelines. This is worse than the estimates for London and England. Furthermore, 1 in 5 children in Hillingdon are measured as overweight or obese in reception year increasing to 1 in 3 children overweight or obese by Year 6²⁷.
- 6.18 There are several barriers that prevent children from them from being active. This includes the prevalence of sedentary activities, lack of access to safe and accessible facilities and physical or developmental challenges that can make certain physical activities difficult or inaccessible²⁸.
- 6.19 Screen based activities have been shown to compete with children spending time outdoors in the natural environment. There is preliminary evidence that access to nature can potentially provide a public health resource for the well-being of children and young people²⁹.
- 6.20 The Covid-19 pandemic and the inequalities of access to green space in society have highlighted the importance of access to nature for children. Closure of school playgrounds, parks and restriction of travel reduced children's chances to play in nature.
- 6.21 Evidence from the Monitor of Engagement with the Natural Environment national survey of children and young people in England (2018/19 data) shows that those who are disabled and those from lower income households and ethnic minority groups have less access to nature³⁰. Factors affecting access for these groups include time availability and lack of transport access³¹.
- 6.22 Some studies have identified a correlation between engagement with nature and increase in physical activity and lower rates of obesity amongst children. The links between natural environments and mental health for children include a reduction in, and recovery from, stress

²⁶ Sport England (2024) Active Lives Survey Children and Young People – academic year 2023-24 <https://www.sportengland.org/research-and-data/data/active-lives>

²⁷ Department of Health and Social Care (2024) Obesity Profile - Data (<https://fingertips.phe.org.uk/profile/national-child-measurement-programme/data>)

²⁸ Everyone Active (2025) <https://www.everyoneactive.com/content-hub/fitness/physical-activity-for-children/>

²⁹ Oswald, T. K et al (2020) Psychological impacts of "screen time" and "green time" for children and adolescents: A systematic scoping review. PloS one, 15(9), e0237725. doi:10.1371/journal.pone.0237725

³⁰ Natural England. (2019) Monitor of Engagement with the Natural Environment - Children and Young People Report.

³¹ Dr. Tansy Watts (2021) A Literature Review Exploring Young Children's Access to Natural Environments in the UK

and anxiety, improved concentration, self-regulation, better academic performance and reduction in ADHD symptoms³².

- 6.23 Children are more vulnerable to the adverse health effects of noise and air pollution. For example, children are more susceptible to air pollutants (in particular PM 2.5) than adults as their lungs, brains and immune systems are still developing³³. Noise from construction activities can also affect human health with sound experienced in different ways by different people according to characteristics such as age³⁴. Heightened sensitivity to noise is common amongst autistic people, with 50 to 70% of autistic people hypersensitive to everyday sounds. This may cause distress and interfere with routine activities such as in learning environments³⁵.
- 6.24 There are over 7,700 children and young people aged 0-25 years with SEND in Hillingdon which constitutes approximately 11.9% of children and young people. During 2023-24, the Council identified 16.6% of students who have either an Education Health Care Plan (EHCP) or are receiving SEN Support. Furthermore, 1.1% of 16-17 year olds were Not in Education, Employment or Training (NEET). Life skills training is important for both young people with SEND and those who are NEET. It provides practical and social skills needed for participating in employment, social interaction and independent living. These skills often cover areas such as self-care, financial literacy and shopping and meal preparation.

Key issues for older people:

- 6.25 Physical activity varies with age and life stage. People tend to get less active with age, especially in older years. Physical barriers to outdoor activity can include steep gradients, steps, uneven path surfaces, limited seating and resting places and excessive distances.
- 6.26 Older people may find it more difficult to use digital information (especially where information is on websites that do not conform to accessibility standards)³⁶.
- 6.27 Older people are also more vulnerable to the environmental, safety and accessibility impacts of construction activities associated with new developments and infrastructure projects. Chronically ill and elderly people are more sensitive to disturbance³⁷.

Sex

- 6.28 Table 6-5 shows that the borough has a population breakdown by sex in line with London and England rates.

Table 6-5 Hillingdon breakdown by sex (Census 2021)

Sex	Hillingdon	London	England
Women	50.6%	51.5%	51.0%
Men	49.4%	48.5%	49.0%

³² Natural England (2022) How nature can support children and young people
<https://publications.naturalengland.org.uk/publication/6705674179575808>

³³ UNICEF (2018) A Breath of Toxic Air: UK Children in Danger <https://www.unicef.org.uk/publications/child-health-breath-of-toxic-air/>

³⁴ M Mir et al (April 2023) Construction noise effects on human health: Evidence from physiological measures in Sustainable Cities and Society <https://www.sciencedirect.com/science/article/pii/S2210670723000811#bbib0007>

³⁵ Williams, Zachary J; Suzman, Evan; Woynaroski, Tiffany G (2021) Prevalence of Decreased Sound Tolerance (Hyperacusis) in Individuals With Autism Spectrum Disorder: A Meta-Analysis. Ear and Hearing 42(5):p 1137-1150, September/October 2021. | DOI: 10.1097/AUD.0000000000001005

³⁶ Paths for All and Sensory Trust (April 2023) Outdoor Accessibility Guidance <https://www.pathsforall.org.uk/resources/resource/outdoor-accessibility-guidance-download>

³⁷ World Health Organisation (2010) Noise Factsheet <https://www.who.int/Europe/news-room/fact-sheets/item/noise>

Key issues and barriers to participation for women and girls:

- 6.29 Around 1 in 3 (34%) of men and 1 in 2 (42%) of women are not active enough for good health. Men are more likely to report being active at the recommended level than women. According to the Active Lives Survey boys (51%) are more likely to be active than girls (45%) and are more likely than girls to have three or more positive attitudes towards physical activity. Positive attitudes include enjoyment, competence, confidence and knowledge or understanding. For Asian girls, the difference is greater with this group being 6.4% more inactive than Asian boys.
- 6.30 Barriers to participating in physical activity for women include lack of confidence, menstrual, perimenopause or menopause symptoms, caring responsibilities³⁸, cultural or social beliefs, affordability and time.
- 6.31 Barriers experienced by girls can include motivation, bad previous experiences, confidence issues (including body issues), lack of role models or representation in sports, menstruation and clothing. Girls can also feel excluded through the design of public spaces and feel safer in smaller spaces that no one group can dominate³⁹.
- 6.32 Research by This Girl Can campaign reveals that only 1 in 10 women from lower-income backgrounds feel they 'completely belong in the world of physical activity' – highlighting barriers such as inclusion, affordability and tailored support. The insights find that for women on lower incomes from underrepresented groups, including Black women, Asian Muslim women, pregnant women, new mothers, and older women, the challenges and feelings of not being included are even greater⁴⁰.

Disability

- 6.33 Table 6-6 shows a lower level of residents who are disabled in comparison to London and national rates.

Table 6-6 Hillingdon population breakdown by disability status (Census 2021)

Disability status	Hillingdon	London	England
Disabled under the Equality Act	12.9%	13.2%	17.3%
<i>Disabled under the Equality Act: Day-to-day activities limited a lot</i>	5.6%	5.7%	7.3%
<i>Disabled under the Equality Act: Day-to-day activities limited a little</i>	7.3%	7.5%	10.0%
Not disabled under the Equality Act	87.1%	86.8%	82.7%

Key issues for disabled people:

- 6.34 Disabled people or people with long-term conditions are twice as likely to not be active enough for good health as non-disabled people or people without long-term health conditions. Only 4 in 10 disabled people (41%) feel they are given the opportunity to be as physically active as they

³⁸ UK Parliament (March 2024) Health barriers for girls and women in sport
<https://publications.parliament.uk/pa/cm5804/cmselect/cmwomeq/130/report.html#heading-2>

³⁹ Make Space for Girls (2023) Make Space for Girls: The Research Background <https://www.makespaceforgirls.co.uk/>

⁴⁰ This Girl Can (Feb 2025) Belonging Starts with Inclusion
https://www.thisgirlcan.co.uk/campaign-hub/resources/insight?section=belonging_starts_with_inclusion

want to be⁴¹.

- 6.35 Disabled people are not one homogenous group and face a range of complex barriers to physical and outdoor activity⁴². Those with sensory impairments and limited mobility, can face accessibility issues when using leisure facilities⁴³. These include inaccessible buildings, lack of information about accessibility, lack of clean and adequate changing facilities, and staff with limited knowledge about disabled access⁴⁴. Physical barriers to outdoor activity may also include steep gradients, steps, uneven path surfaces, limited resting places and seating and excessive distances are also of particular concern to those with mobility or sensory impairments.
- 6.36 Those with dementia or those who are neurodivergent may have different experiences and needs in using buildings and outdoor spaces⁴⁵. For example, those with ADHD or autism may experience anxiety in unknown spaces and may need quiet spaces or calm zones to retreat from sensory overload.
- 6.37 Transport to and from facilities can also pose a barrier to participation for disabled people, in particular those with mobility issues. Private vehicle use is often the favoured mode of transport for disabled people or those with mobility issues. Walking long distances or using public transport may be unviable options for this group⁴⁶.
- 6.38 Disabled people are most likely to say they prefer being active in outdoor spaces like parks, countryside, or woodland compared to other locations⁴⁷. Lack of representation, as well as other people's stereotypes and assumptions can act as significant barriers to outdoor activity and accessing nature for disabled people. Common experiences for many disabled people include being stared at, reduced expectations of disabled people undertaking adventurous activities and a lack of awareness and negative judgements of those living with less-visible and hidden disabilities⁴⁸.
- 6.39 Information for disabled people is very important particularly in trip planning and navigating sites. Different groups may require information in different formats for example, audio, visual, braille etc. Disabled people may find it more difficult to use digital information especially where information is on websites that do not conform to accessibility standards⁴⁹.
- 6.40 Guidance from Sport England shows that some approaches by activity organisers were off-putting for disabled people because they largely wish to be treated in the same way as others. These approaches include asking individuals about their support needs in front of other people, having the pace or approach of the whole class changed to suit them, especially if they are identified as the reason, creating an impression of favouritism by appearing to give the individual special attention or drawing attention to the fact they are being treated differently⁵⁰.

⁴¹ Activity Alliance (2024) Annual Disability and Activity Survey 2023-24 <https://www.activityalliance.org.uk/how-we-help/research/annual-survey>

⁴² Sport England (Jan 2021) Uniting the Movement Strategy <https://www.sportengland.org/about-us/uniting-movement>

⁴³ Allcock, A (2018) Disability and access to leisure. Available at: <https://www.iriss.org.uk/resources/esss-outlines/disability-access-leisure>

⁴⁴ Copestake et al., (2014) Removing barriers, raising disabled people's living standards. Available at: <http://www.opm.co.uk/wp-content/uploads/2014/05/Removing-barriers-raising-living-standards.pdf>

⁴⁵ BSI (Oct 2022) Design for the mind – Neurodiversity and the built environment: Guide <https://knowledge.bsigroup.com/products/design-for-the-mind-neurodiversity-and-the-built-environment-guide>

⁴⁶ HMD (2017) Hidden Mobility Disabilities. Methodology. Available at: <https://hiddenmobilitydisabilities.com/methodological-issues/#:~:text=HMDA%20research%20data%20indicate%20that,can%20walk%20without%20health%20consequences.>

⁴⁷ Activity Alliance (2024) Annual Disability and Activity Survey 2023-24 <https://www.activityalliance.org.uk/how-we-help/research/annual-survey>

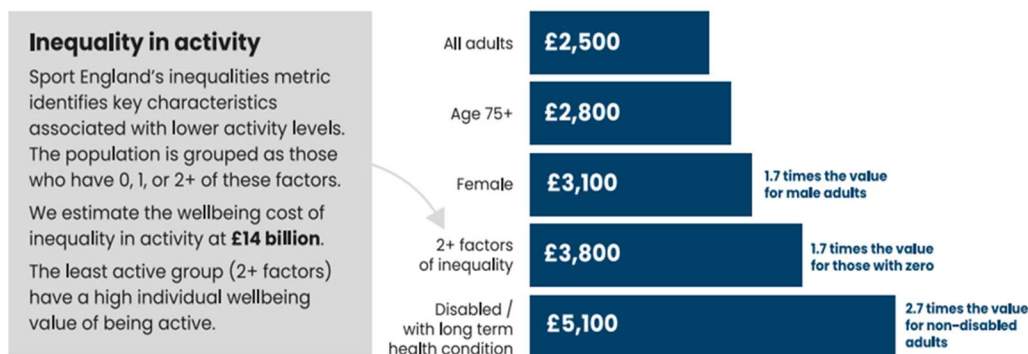
⁴⁸ Natural England (Sep 2022) Included outside: Engaging people living with disabilities in nature <https://publications.naturalengland.org.uk/publication/6250437023105024>

⁴⁹ Paths for All and Sensory Trust (April 2023) Outdoor Accessibility Guidance <https://www.pathsforall.org.uk/resources/resource/outdoor-accessibility-guidance-download>

⁵⁰ Sport England (2023) Mapping Disability: Engaging Disabled People https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/engaging-disabled-people_the-research.pdf?VersionId=Bv9kxj4MySSJmpahilXUGVoSYkL2TYLs

- 6.41 Sports England research to understand the social value of physical activity shows that the wellbeing value of being active is highest for disabled people (see Figure 6-3). The wellbeing value for 150 mins per week (per person, per year) is 2.7 times the value for disabled adults than non-disabled⁵¹.

Figure 6-3 Active wellbeing value for different demographic groups (Sport England)



Race

- 6.42 Table 6-7 shows that the percentage of non-white ethnic groups in Hillingdon is higher than London and national rates. Asian, Asian British or Asian Welsh constitute the highest proportion of ethnic minority groups with Indian and Pakistani ethnicities forming the highest percentage within this group. Only 77.9% of households in Hillingdon have English as their main language compared with 90.8% nationally. Other significant main languages include Panjabi (4.6%), Romanian (1.8%) and Polish (1.7%).

Table 6-7 Hillingdon population breakdown by ethnicity (Census 2021)

Ethnic group	Hillingdon	London	England
Asian, Asian British or Asian Welsh	33.3%	20.7%	9.6%
Black, Black British, Black Welsh, Caribbean or African	7.8%	13.5%	4.2%
Mixed or Multiple ethnic groups	4.4%	5.7%	3.0%
White	48.2%	53.8%	81.0%
Other ethnic group	6.3%	6.3%	2.2%

Key issues for ethnic minority groups:

- 6.43 Minority ethnic adults in England are likely to be less physically active compared to White adults. The percentage of Asian people aged over 16 who were physically active (150 minutes or more of moderate intensity physical activity a week) was 55% compared to 63.1% for the overall population.
- 6.44 The disproportionality is even greater for Asian females, with only 49.7% responding they were

⁵¹ https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/2024-10/Social%20Value%20of%20Sport%20-%20Primary%20Value%20V3..pdf?VersionId=asjmLhOPlwgzcJuGzAgvoX.Hdz5u_yFE

physically active in 2022, compared to 62.2% of White British females.⁵²

- 6.45 Barriers to participation in physical activity, in particular among the Asian community, include prioritisation of education over leisure, and lack of consultation when opening new facilities to help ensure they are culturally appropriate.⁵³
- 6.46 Those for who English is not a first language may require information in different languages to enable participation.

Religion/belief

- 6.47 Table 6-8 shows that the percentage of the population with no religion or who are Christian is lower in Hillingdon than for London or national levels. The Sikh and Hindu populations is much higher than for London and national rates and there is also a relatively high Muslim population.

Table 6-8 Hillingdon population breakdown by religion (Census 2021)

Religious group	Hillingdon	London	England
No religion	19.4%	27.1%	36.7%
Christian	39.0%	40.7%	46.3%
Buddhist	0.9%	0.9%	0.5%
Hindu	10.8%	5.1%	1.8%
Jewish	0.5%	1.7%	0.5%
Muslim	14.4%	15.0%	6.7%
Sikh	8.6%	1.6%	0.9%
Other religion	0.9%	1.0%	0.6%
Not answered	5.6%	7.0%	6.0%

Key issues for religious/belief groups:

- 6.48 Sport England research shows that people who state they have no religion are more likely to be physically active compared to those that belong to a faith group. Of those that do, participation in sport and physical activity is higher among some faith groups than others⁵⁴. For example, amongst those practising a religion, those of a Buddhist, Christian, Jewish or Sikh faith are more likely to be physically active. In contrast, activity levels are lowest amongst those who practise Islam.
- 6.49 Some groups may experience barriers to physical activity due to factors such as cultural expectations and clothing, for example modest clothing requirements might limit options for

⁵² Gov.UK (2022) Ethnicity facts and figures. Physical activity. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/health/diet-and-exercise/physical-activity/latest>

⁵³ TfL (2011) What are barriers to cycling amongst ethnic minority groups and people from deprived backgrounds. Available at: <https://content.tfl.gov.uk/barriers-to-cycling-for-ethnic-minorities-and-deprived-groups-summary.pdf>

⁵⁴ Sport England (2024) Active Live Adults Survey (2022- 2023) <https://www.sportengland.org/research-and-data/data/active-lives>

women and girls⁵⁵.

- 6.50 Some religious or belief groups may have differing needs relating to their religion/belief which may impact spending time away from home. For example, preparing meals for dietary requirements with kosher or halal products or a vegan/vegetarian diet. Certain religious practices, for example, fasting during Ramadan, can also affect energy levels and the ability to engage in physical activity. There may also be a need for worship or prayer activities to coincide with certain important religious events.

Gender reassignment

- 6.51 Table 6-9 provides a breakdown of the population by gender identity. This shows rates in line with London but a high representation of trans people than for national rates.

Table 6-9 Hillingdon population breakdown by gender identity (Census 2021)

Gender	Hillingdon	Greater London	England
Gender identity the same as sex registered at birth	91.7%	91.2%	93.5%
Gender identity different from sex registered at birth but no specific identity given	0.5%	0.5%	0.2%
Trans woman	0.2%	0.2%	0.1%
Trans man	0.2%	0.2%	0.1%
All other gender identities	0.1%	0.1%	0.1%
Not answered	7.4%	7.9%	6.0%

Key issues for trans people:

- 6.52 Whilst there is limited evidence at the local level on gender reassignment, national level research, highlights the levels of discrimination and hate crime faced by trans people⁵⁶.
- 6.53 Trans people engage in lower levels of physical activity compared to cisgender (non-trans) people. However, engaging in activity can be particularly important for transgender and non-binary identifying people as they also experience poorer mental health than cisgender people⁵⁷.
- 6.54 Several barriers to physical activity and sport have been identified for trans people, including discomfort of using changing and showering facilities, gendered sport clothing, body dissatisfaction and fears around not being accepted by others⁵⁸.

⁵⁵ Transport for London (2011) What are the barriers to cycling amongst ethnic minority groups and people from deprived backgrounds? <https://content.tfl.gov.uk/barriers-to-cycling-for-ethnic-minorities-and-deprived-groups-summary.pdf>

⁵⁶ Stonewall (2018) LGBT in Britain: Trans Report https://files.stonewall.org.uk/production/files/lgbt_in_britain_-_trans_report_final.pdf

⁵⁷ National Centre for Sports & Exercise Medicine (2023) Barriers to physical activity in transgender and non-binary populations. Available at: <https://www.ncsem-em.org.uk/research/mental-health-and-wellbeing/projects/barriers-to-physical-activity-in-transgender-and-non-binary-populations/>

⁵⁸ Jones, B et al (2017). Barriers and facilitators of physical activity and sport participation among young transgender adults who are medically transitioning. Loughborough University. Journal contribution. <https://hdl.handle.net/2134/24882>

6.55 48% of trans people do not feel comfortable using public toilets through fear of discrimination or harassment. Many also avoid gyms, leisure facilities, clubs or social groups and public transport altogether.⁵⁹

Sexual Orientation

6.56 Table 6-9 provides a breakdown by sexual orientation. This shows a lower proportion of non-heterosexual population than for London.

Table 6-10 Hillingdon population breakdown by sexual orientation (Census 2021)

Sexual orientation	Hillingdon	Greater London	England
Straight or Heterosexual	88.9%	86.2%	89.4%
Gay or Lesbian	0.9%	2.2%	1.5%
Bisexual	1.0%	1.5%	1.3%
Pansexual	0.1%	0.1%	0.1%
Asexual	0.0%	0.0%	0.1%
Queer	0.0%	0.1%	0.0%
All other sexual orientations	0.3%	0.3%	0.2%
Not answered	8.9%	9.5%	7.5%

Key issues for non-heterosexual groups:

6.57 Physical activity levels of over 150 mins per week amongst Gay or Lesbian people (71.1%) and Bisexual people (70.2%) is higher than for heterosexual people (64%). However, those with other sexual orientation have a lower rate at 60%⁶⁰.

6.58 Sexual orientation is one of the five groups covered by the hate crime legislation⁶¹ and the most pertinent issue faced by this group relates to fears about intimidation, violence and/or abuse. However, there is limited evidence in relation to using outdoor activity facilities associated with these fears.

Pregnancy and Maternity

Key issues for pregnancy and maternity:

- Pregnant women are mobility restricted, particularly at later stages of pregnancy and may have concerns or issues with regards to accessibility and safety associated with steep gradients, steps, uneven path surfaces, limited seating and resting places and excessive distances.

⁵⁹ Equality and Human Rights Commission (2015) Is Britain Fairer?

https://www.equalityhumanrights.com/sites/default/files/key_facts_and_findings- transgender_0.pdf

⁶⁰ <https://www.sportengland.org/research-and-data/data/active-lives/active-lives-data-tables>

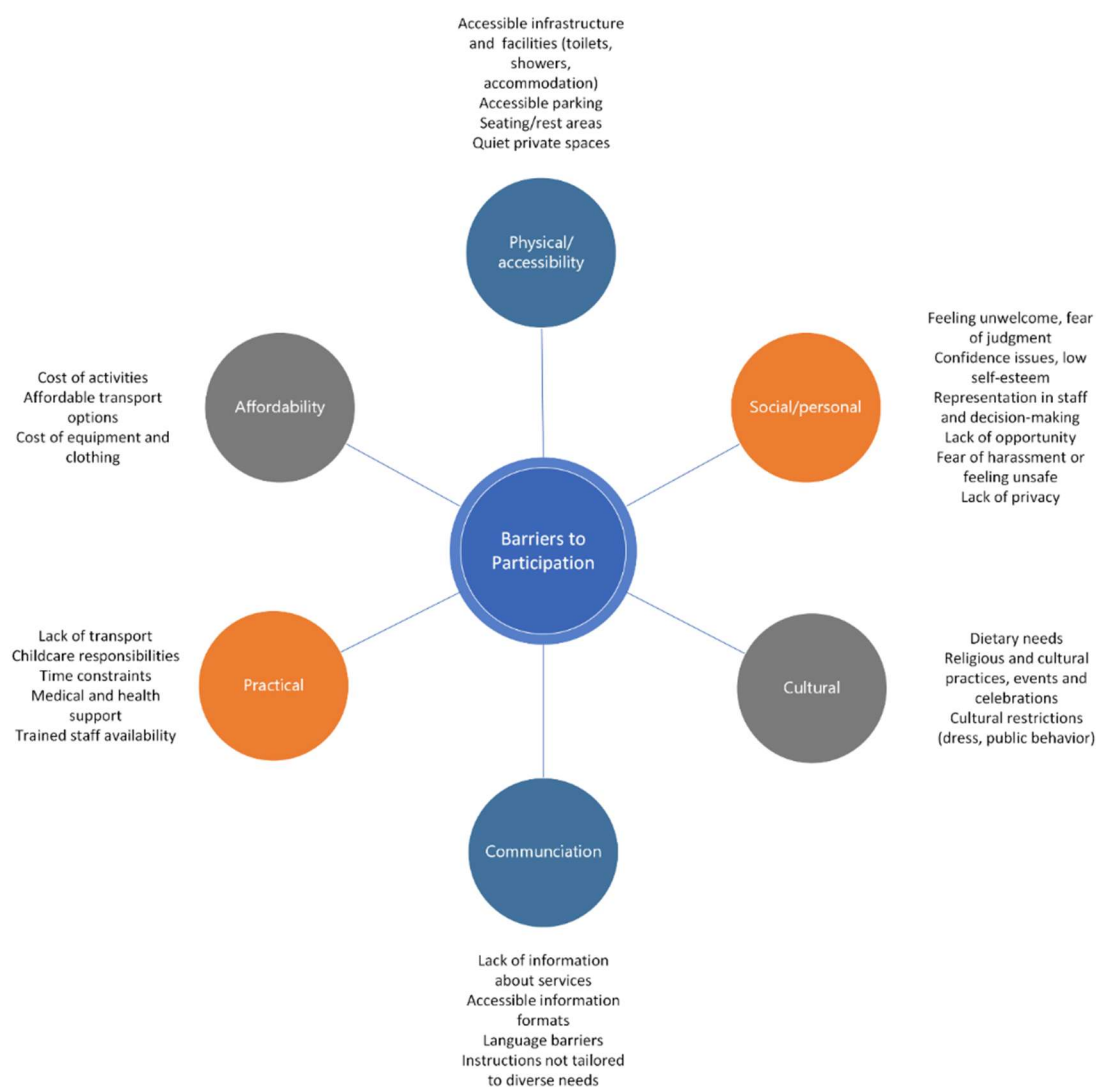
⁶¹ <https://www.cps.gov.uk/crime-info/hate-crime#:~:text=Someone%20can%20be%20a%20victim,convicted%20of%20a%20hate%20crime.>

- Pregnant visitors may also need to access facilities whilst feeling nauseous or ill. Space is also required for new mothers to feed and change babies.
- Pregnant women are more vulnerable to the adverse effects of air pollution including an increasing risk of miscarriage as well as premature births and low birth weights⁶².

Summary of barriers to participation

6.59 Figure 6-4 summarises the barriers to participation experienced across protected characteristic groups in relation to physical and outdoor activity, employment and learning. These are categorised into physical/accessibility barriers, social barriers, cultural barriers, practical barriers, communication barriers and affordability barriers.

Figure 6-4 Summary of barriers to participation for protected characteristic groups



⁶² Mitku, A.A., Zewotir, T., North, D. *et al.* (2023) Impact of ambient air pollution exposure during pregnancy on adverse birth outcomes: generalized structural equation modelling approach. *BMC Public Health* **23**, 45 (2023). <https://doi.org/10.1186/s12889-022-14971-3>

7. Assessment of impacts

Introduction

- 7.1 This assessment considers the potential impacts on affected groups sharing protected characteristics associated with the design and delivery of the proposed development.
- 7.2 Both positive and negative impacts have been assessed as well as planned mitigation and further recommended actions to reduce negative impacts and enhance positive impacts.

Scope of assessment

Protected characteristics

- 7.3 Table 7-1 sets out for each potential user group of HWSFAC whether they are likely to be predominantly formed of a specific protected characteristic group. An orange tick box has been used to show where this applies (for example, school groups will be predominantly formed of children).
- 7.4 A further level of assessment has been undertaken to identify other protected characteristics for each user group that may differentially affect their experience in using the facility. These are indicated by a blue tick box. For example, whilst school groups are likely to be predominantly children, those children may also be girls or boys, disabled, from a specific ethnic minority group or religion or transgender.
- 7.5 This exercise shows that all protected characteristics are likely to be relevant to the assessment and included in the evidence review.
- 7.6 Age (children and young people), sex (women and men or boys and girls) and disability have been identified as the predominant protected characteristic groups for the assessment. Any impacts of the proposed development are likely to have a disproportionate impact on these groups. These groups may also experience differential impacts or needs associated with the proposed development.
- 7.7 Other protected characteristics are likely to be a consideration across all user groups, as there are likely to be differential needs relating to their characteristic. These include race, religion/belief and gender reassignment.
- 7.8 Some protected characteristics may only be relevant with regards to workers and equality legislation in the workplace, for example, marriage and civil partnership and sexual orientation. Pregnancy and maternity has been applied to adult user groups but it is acknowledged that this could also apply to some people under the age of 18.

Table 7-1 User group – analysis of protected characteristics

	Age - Children	Age - Young people	Age - Older People	Sex	Disability	Religion/belief	Race	Sexual orientation	Gender reassignment	Pregnancy/Maternity	Marriage/Civil partnership
School groups	✓			✓	✓	✓	✓		✓		
Scout and Girl Guide groups	✓			✓	✓	✓	✓		✓		
Cadets	✓	✓		✓	✓	✓	✓		✓		
Children, young people and adults with additional needs	✓	✓		✓	✓	✓	✓		✓		
Sailing Club members	✓	✓	✓	✓	✓	✓	✓		✓	✓	
Families	✓	✓	✓	✓	✓	✓	✓		✓	✓	
Ecologists		✓	✓	✓	✓	✓	✓		✓	✓	
Permanent staff	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
User group staff		✓	✓	✓	✓	✓	✓		✓	✓	
Seasonal live-in staff	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Anglers	✓	✓	✓	✓	✓	✓	✓		✓	✓	

Potential impacts

- 7.9 The impact assessment is based on the proposed design as set out in the interapplication design. This outlines the proposals for a new water sports and outdoor activity facility to replace existing facilities at HOAC and provides improved facilities for Broadwater Sailing Club and the Gerrards Cross Angling Society.
- 7.10 The proposed development will provide an increase in capacity for visitors and a wider range of inclusive accommodation activities in comparison to HOAC. Additional jobs and volunteering opportunities will be created as well as the opportunity for learning and skills development.
- 7.11 The findings of the assessment has been set out according to the activities and services provided by HWSFAC:
- Access to outdoor activity and nature;

- Access to employment and volunteering; and
- Access to education, skills and training.

Access to outdoor activity and nature

Positive impact: Reduced physical and accessibility barriers to outdoor activity and nature

- 7.12 The proposed development has been designed to be fully accessible for disabled people as well as others with mobility restrictions including older people, families with babies and small children and pregnant women. Various inclusive design guides have been used in the design of the buildings and site including:
- BS8300-2:2018 Design of an accessible and inclusive built environment
 - Sport England Accessible and inclusive sports facilities (AISF) guide
 - PAS 6463 Design for the Mind. Neurodiversity and the Built Environment
- 7.13 All buildings have been designed with a comprehensive range of accessible sanitary provision to meet the needs of disabled people and families with babies and young children. This includes three Changing Places rooms, accessible toilets and changing rooms, SuperLoos and family changing rooms. Accessible and inclusive sanitary provision is provided in all buildings and on both floors of the main building. This allows for flexible use of facilities depending on the requirements of visiting groups.
- 7.14 A hearing loop will be installed in the main reception and clear signage, adhering to Sport England guidance, will form an integrated part of the design, both internally and externally. This will support those with visual and sensory impairments to navigate the site.
- 7.15 The site is mainly flat and all external areas of the site and landscaping will be accessible. Special land buggies are being proposed to allow wheelchair users to safely access parts of the site. A range of congregation shelters and areas will be able to accommodate large groups, small groups and individuals with different needs. For example, quiet zones have been included in the design to provide places for baby feeding or a quiet space for neurodiverse people.
- 7.16 The proposed development includes allowance for camping zones for visitors with a variety of needs. There is a three tiers approach to camping accommodation. This demotes the types of users who could access and use the different campsites, depending on their needs (refer to paragraph 4.31). The fully inclusive overnight accommodation provides a wide range of groups with the option for overnight stays. Lack of accessible accommodation may be a barrier for some groups in spending time away from home and as such, this facility encourages active participation for disabled children and adults.
- 7.17 Each campsite has nearby access to Changing Places facilities, accessible and individual toilets, showers and catering facilities. This makes them self-sufficient and avoids the need for groups to travel between buildings or zones to use facilities. Facilities are also available for staff travelling with groups allowing them comfort and flexibility whilst providing care and support to the groups.
- 7.18 Water and land activities are being designed to allow everyone, including disabled people, to participate in all activities.
- 7.19 Many practical barriers to participation have been reduced by implementing a flexible use of space. For example, this allows areas to be used for multiple purposes. such as storage of medical facilities, medical and health care worker accommodation etc.

- 7.20 Overall, HWSFAC will support and encourage disabled people to participate in physical activity and increase engagement with nature. The focus is on enabling everyone to take part in activities respecting their abilities, providing equal opportunities, and creating a sense of belonging and inclusion.

Positive impact: Reduced social and cultural barriers to outdoor activity

- 7.21 The proposed development has followed inclusive design guidance from Sport England and Building Standards.
- 7.22 All buildings have been designed with a range of sanitary provision to meet the differing needs of groups that may require more privacy including women and girls, trans people and those from ethnic minority groups. This includes individual toilets, showers and changing rooms for independent users. Inclusive sanitary provision is provided in all buildings and on both floors of the main building. This will provide flexible use of facilities depending on the requirements of visiting groups.
- 7.23 The provision of single toilet spaces can have a positive impact on individuals who may not feel comfortable using gender-segregated toilets. For example, trans people and others who may face discrimination in gendered/single sex spaces.
- 7.24 Women and girls may experience barriers due to lack of adequate provision of toilets and those who are menstruating or menopausal may need additional privacy and facilities. Toilets have been designed so that in a mixed sex group, public toilet spaces can be made 2/3 female and 1/3 male to help support quicker access to toilet facilities for women and girls. The design of the proposed development has followed BS 30416 Menstruation, Menstrual Health and Menopause guidance to ensure facilities are meeting the needs of this group.
- 7.25 A range of food and drink preparation and storage areas will be provided across the proposed development. This will help to provide separate areas for preparation and storage of food for specific dietary requirements, for example halal or kosher diets.
- 7.26 The above actions will help support a range of groups including women and girls, ethnic minority groups, religious and belief groups and trans people to overcome some of the main social and cultural barriers to participating in physical and outdoor activity.

Positive impact: Health and wellbeing outcomes of increased physical activity

- 7.27 The proposed development will provide a range of water and land based activities that are planned to be accessible for all groups. Participating in outdoor activities promotes physical activity and fitness, which in turn improves overall health and reduces risk of obesity.
- 7.28 Hillingdon has lower than average physical activity levels and higher levels of obesity amongst both adults and children. The proposed development can support physical activity amongst those who are more likely to be obese such as ethnic minority groups, boys, and those children with parents who are overweight or obese.
- 7.29 Taking part in challenging activities can also support wellbeing by boosting confidence levels, encourage problem-solving, and create a sense of achievement and personal growth. Outdoor physical activities also provide opportunities for team working, social interactions and building relationships. These all contribute to developing social skills and promoting community cohesion. Many protected characteristics groups may share in these benefits but especially women and girls for whom confidence levels in regard to physical activities are low.
- 7.30 However, the extent to which health outcomes can be improved for these groups will depend on the facilities at HWSFAC being appropriate for the needs of these groups and other measures being implemented to reduce barriers to participation.

Positive impact: Health and wellbeing outcomes

- 7.31 The proposed development will improve access to nature and nature based activities for a range of user groups. Evidence shows that spending time in nature:
- Can improve mental and physical health, support academic success, and develop pro-environmental attitudes and behaviours for children⁶³;
 - Has been found to help with mental health problems such as anxiety and depression.
- 7.32 This can benefit protected characteristic groups, especially for disabled people and those from disadvantaged backgrounds who may not have the opportunity to access nature on a frequent basis.
- 7.33 In addition, all buildings are being designed to be net zero by using carbon free building techniques, solar panels and heat pumps. This provides potential better indoor and outdoor air quality, improved heating and ventilation than facilities at HOAC. This is likely to have benefits for those who are more vulnerable to the adverse health effects of poor air quality and extreme temperatures. This includes children, older people and disabled people.

Positive impact: Community engagement

- 7.34 Encouraging civic engagement and ensuring dialogue with all people in the community; particularly those belonging to protected characteristic groups, is an important step in working towards community cohesion. For people belonging to protected characteristic groups, their feelings of a lack of cohesion (or exclusion) may be more acute than others.
- 7.35 The extent to which the benefits of the proposed development would be shared amongst protected characteristic groups depends in part on their input into design plans. Equality impacts may be experienced during engagement activities. For example, young people and ethnic minority people can face barriers to taking part in community engagement processes effectively and therefore be underrepresented in such activities.
- 7.36 User engagement sessions have been undertaken for the proposed development. This has involved organisations representing disabled groups, children and young people. The engagement has helped to identify how former or existing facilities can be improved and also to highlight specific needs and requirements of groups in the proposed development.

Positive impact: Increased community cohesion

- 7.37 The inclusive design will allow a wide range of groups to fully use HWSFAC, participating in water and land based activities, sleeping in overnight camping accommodation and learning.
- 7.38 In addition staff and volunteer accommodation has been designed to be more inclusive for groups for whom representation in outdoor activity is often low. This includes women and girls, disabled people and ethnic minority groups.
- 7.39 This in turn may lead to a wider representation of groups taking part in activities as well as those in leadership and volunteering positions. This has potential to reduce prejudice, tackle negative perceptions and encourage community cohesion between different groups.

⁶³ Patchen, A. K. et al (2022). Barriers to children's outdoor time: teachers' and principals' experiences in elementary schools. *Environmental Education Research*, 30(1), 16–36. <https://doi.org/10.1080/13504622.2022.2099530>

Actions and recommendations for access to outdoor activity and nature:

- Accessibility audits should be undertaken on an annual basis (preferably by a registered access consultant) so that facilities are reviewed against current guidelines and access levels are maintained/improved accordingly.
- Feedback should be gathered from users (and staff) to identify any barriers that have been experienced as a result of accessibility or inclusion issues. This should feed into the accessibility audit.
- Consultation and engagement has been undertaken with the public, stakeholder and end-user groups. This has helped provide user input into the design and function of the facility to support inclusivity and to improve on existing facilities. Engagement activities should continue throughout detailed design, construction and operation stages for example:
 - Design - continued input from user groups and access consultants
 - Construction – engagement should be undertaken with local residents, businesses and users of the lake to inform of timescales for construction activities.
 - Operation – users should be engaged with feedback forms for visitors and staff that can be used for continuous improvement and social impact reporting.
- Additionally, engagement should be undertaken with disabled people and others for whom physical activity participation is low in Hillingdon to promote the facility and identify any barriers to use.
- All staff should receive appropriate disability awareness and inclusion training so that they have the confidence to appropriately communicate with and support disabled people and other underrepresented groups who have specific needs. This includes training on how to provide clear and accessible instructions for activities.
- An information and communication strategy should be prepared. All information should be prepared for groups outlining all accessible facilities on site so that they can be prepared prior to visiting the site. This should include both online and printed materials which are updated regularly as well as information in other languages. Images used in materials should include a wide representation of users from different groups to encourage participation.
- The Council should consider the recommendations of the NSPCC safeguarding assessment to ensure safety, privacy and security of children and young adults staying at HWSFAC.
- A social impact report should be prepared with indicators for participation in activities. This could use Sport England guidance on wellbeing to measure social value generated by activities for different groups.
- A quiet space for multi-faith prayer rooms (or wellbeing rooms) could also be included for visitors and staff. This is important given the diverse religions and faith groups represented in Hillingdon. However, this would need to be separate from quiet areas for baby feeding.
- HWSFAC should keep a supply of equipment to give away or loan to individuals who may not own certain items due to affordability for example, sanitary items, toiletries, swimwear, clothing etc.

Employment and volunteering

Positive impact: Permanent job opportunities

- 7.40 The new facility will provide permanent jobs on site, replacing jobs lost at the former HOAC site. The creation of new jobs could potentially have a positive effect on those in the local community who are disproportionately represented in unemployment figures for example young people, women, ethnic minority groups and disabled people.
- 7.41 However, the groups who benefit from these employment opportunities may vary considerably depending on the type of jobs available and the inclusivity and accessibility of recruitment processes. Equality effects may arise where employment or training is not available to groups with protected characteristics, for example where recruitment policies or processes make it harder for some groups to access the opportunities.

Positive impact: Seasonal work opportunities

- 7.42 The new facility will provide live-in accommodation on site for seasonal workers. This includes fifteen cabins each with its own shower room. Three of the fifteen cabins are designed to be accessible for disabled with mobility and physical impairments and are additional to the number of overnight accommodation spaces provided at HOAC. In addition, the new facility provides kitchen, dining and lounge spaces able to accommodate all staff at one time.
- 7.43 This will be an improvement on the accommodation provided at the HOAC site and increases the inclusion, safeguarding and privacy of seasonal workers. This is a particular benefit for those aged under 18, women and disabled people who may have been excluded from seasonal employment opportunities at HOAC due to accommodation barriers.

Positive impact: Potential for apprenticeships, work placements, experience building and volunteering on site

- 7.44 The proposed development has the potential to provide opportunities for volunteering and work placements for local people. This may benefit those who are more likely to be unemployed such as young people (especially NEETs), disabled people, women and some ethnic minority groups.
- 7.45 The inclusive and accessible facilities mean that those who may have been excluded from participating in volunteering activities due to mobility or sensory impairments or adults with SEND may also be able to be able to participate in volunteering activities. This has the potential to foster good relations between groups as well as increasing confidence and experience for those with protected characteristics. However, this will depend on the extent to which volunteer programmes are promoted to those from the above groups and whether the facility meets their needs to participate.

Positive impact: Temporary employment opportunities created through construction of HWSFAC

- 7.46 The project will result in new jobs being created during the construction of the centre. This could benefit local people, especially those groups who are highly represented amongst unemployed people locally such as young people (aged 18-24), disabled people and certain ethnic minority groups.
- 7.47 The construction of the project will require new techniques and opportunities requiring specialist subcontractors. For example, in net zero construction techniques, designing for outdoor activity and inclusive design. There is an opportunity to create new employment and training for local people.

7.48 As mentioned, a skills, employment and education plan should be prepared for the project. This should include procurement requirements for contractors including accreditation as a Disability Confident Employer.

7.49 The outcomes of the contractor based skills, employment and education plan could be incorporated into a wider evaluation of social impact of the project.

Actions and recommendations for access to employment and volunteering:

7.50 A Skills, Employment and Education Plan should be prepared for the project. This should include how the recruitment process will be inclusive and aim to create a diverse workforce that reflects the local population and user groups visiting HWSFAC. This could consider using positive action to ensure targeting underrepresented groups.

7.51 This should also contain targets for recruitment of local people, training and upskilling the workforce with specialist techniques, work experience placements and supporting with careers events/activities of local education and training providers. It should also include details on how HWSFAC can support local education and social care providers with apprenticeship, volunteer and work experience placements. For example, the Council and contractors could collaborate with the following:

- Uxbridge College.
- The Orchard Hill College in Uxbridge⁶⁴ - offers courses with vocational pathways for people with an EHCP. These pathways include building maintenance, catering and hospitality, customer service and volunteering.
- Hillingdon Council's Adults with learning difficulties and disabilities service.
- Burleigh College – West London NEET Elevate Programme⁶⁵.
- Green Corridor⁶⁶.
- West London College⁶⁷ – Construction and plumbing courses.

7.52 The Council has been awarded Disability Confident Leader status which recognises its commitment to fair recruitment, training, retention and consultation for disabled people and to increase disability awareness. Any external operators on site should also be expected to be enrolled on the Disability Confident Scheme.

7.53 The employment of live-in seasonal workers under the age of 18 requires careful consideration of wider safeguarding and privacy issues. The Council has commissioned an NSPCC safeguarding assessment for the proposed development to ensure that appropriate systems and processes are in place for staff aged under 18 years. The Council should consider the recommendations of the safeguarding assessment to ensuring safety, privacy and security of children and young adults working and living at the facility.

⁶⁴ <https://orchardhill.ac.uk/courses/skills-for-work-and-living/>

⁶⁵ [West London NEET Elevate Programme | Burleigh College](#)

⁶⁶ [SEN Education | Green Corridor | Main Road Nurseries, Stanwell Moor Road, Hillingdon, TW19 6BS](#)

⁶⁷ <https://www.wlc.ac.uk/courses/construction-plumbing/>

Education, skills and training

Positive impact: Opportunities for leadership skills training on site

- 7.54 HWSFAC will deliver leadership skills training for those aged 16 years and above in a range of water and land based sports and activities. This will enable them to become specialised leaders in a sport and may ultimately lead to longer-term employment.
- 7.55 Improvements have been made to facilities for live-in staff. Accommodation is more accessible and flexible than the existing HOAC site which increases the opportunity for more diverse groups to participate in leadership skills development. This is a benefit that can be shared by disabled people, women and people aged under 18 years.

Positive impact: Environment and ecology education for adults, children and young people

- 7.56 The proposed development will seek to educate young people about the environment and specifically, the local ecology on site. As well as operating as an Ecology Field Study Centre, specific water and land activities will be available to younger learner groups, for example pond dipping, bird watching, tree observation and study.
- 7.57 This may result in increased environmental stewardship amongst children and young people, promoting environmental conservation and sustainability. This could benefit those from disadvantaged backgrounds who may not have the opportunity to undertake learning in the natural environment on a frequent basis. Ofsted state that 'when planned and implemented well, learning outside the classroom contributed significantly to raising standards and improving pupils' personal, social and emotional development.' The proposed development must be OFSTED compliant.
- 7.58 The Government's policy paper on sustainability and climate change: a strategy for the education and children's services systems⁶⁸ states that 'seeing sustainability brought to life in the buildings around them will allow children and young people to gain experiences which will enhance and contextualise their learning'. There is the opportunity for children and young people to participate in finding out about net zero building and the impact of energy and water use.

Positive impact: Additional informal learning opportunities

- 7.59 In addition to more formal learning, HWSFAC has potential to provide more informal learning and life skills development such as meal preparation, healthy living, addiction recovery, obesity challenges, budgeting and maintenance. This may be a particular benefit for children and young people from more deprived households who may not have opportunity to gain experience and skills at home.
- 7.60 The centre has an opportunity to provide accommodation for other organisations and programmes, such as Duke of Edinburgh, which require facilities for overnight accommodation and outdoor activities.

Actions and recommendations for access to employment and volunteering:

- 7.61 The employment of live-in seasonal workers under the age of 18 requires careful consideration of wider safeguarding and privacy issues. The Council has commissioned a safeguarding assessment by the NSPCC to ensure that appropriate systems and processes are in place for

⁶⁸ (Dec 2023)sustainability and climate change: a strategy for the education and children's services systems
<https://www.gov.uk/government/publications/sustainability-and-climate-change-strategy/sustainability-and-climate-change-a-strategy-for-the-education-and-childrens-services-systems>

staff aged under 18 years.

- 7.62 As discussed above, a Skills, Employment and Education Plan should be prepared. This should include how the opportunities for leadership skills can be advertised widely to attract a diverse range of applicants. This could consider using positive action to ensure targeting underrepresented groups to apply for leadership programmes. This should also consider how informal learning opportunities can be delivered by HWSFAC.
- 7.63 Feedback should be gathered from users on their experience of learning of the environment and nature at HWSFAC. This should be used to inform the ongoing development of education programmes.

Other impacts

Positive impacts: Potential for lower maintenance and operational costs resulting in low costs for users

- 7.64 The proposed development is being built to high quality standards, using robust materials and a layout that is both accessible and flexible to futureproof against a change in requirements or standards. The building will be net zero with energy supplied by solar panels and geothermal heat pumps and designed for easy and low cost maintenance and operation.
- 7.65 Some minimal additional costs may be required to incorporate accessibility requirements. However, it is cost-effective in the long term, as the later costs of adapting to incorporate accessibility once built could exceed initial construction costs.
- 7.66 Low operation and maintenance costs may allow affordable costs to users to be kept to minimum, providing savings are passed on to groups. This is likely to have benefits for organisations that support children and young people from low income and deprived households.

Negative impacts: Potential health and wellbeing impacts during construction activities

- 7.67 The construction of the site will take approximately 14 months to complete (based on Oct 23 application). During this time there may be an increase in noise, vibration and emissions from construction activities as well as from construction vehicles travelling to and from the site.
- 7.68 Some groups are more susceptible to the adverse health effects of poor air quality and increased noise, for example, children, older people and certain disabled people. Therefore, these groups may experience differential effects as a result of construction related impacts.
- 7.69 A Gypsy Roma Traveller site is located on the access road to the proposed development. Transference of noise through trailer and caravan walls can be greater than through the walls of conventional housing⁶⁹. This results in an additional risk of increased noise impacts from construction traffic and constructions for communities living in caravans or mobile homes.
- 7.70 The construction of the proposed development may also result in some minimal disruption to members of Broadwater Sailing Club and anglers using the lake including children, young people and disabled people. The proposed development will also result in improved facilities for all current users of the lake and as such, these groups will benefit from the proposed development.
- 7.71 Noise and air quality assessments have been undertaken as part of the Environmental Impact

⁶⁹ Department for Communities and Local Government (2008) Designing Gypsy and Traveller Sites Good Practice Guide
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/11439/designinggypsiesites.pdf

Assessment. An outline Construction Environmental Management Plan (CEMP) has been developed and this will be developed into a full CEMP during construction activities. This will set out the strategy, standards, control measures and monitoring procedures that will be implemented to manage and mitigate any adverse environmental effects of the construction process, including mitigation measures defined by the Environmental Impact Assessment.

- 7.72 It is recommended that further assessment of impacts on the Gypsy Roma Traveller community should be undertaken. This includes engagement and liaison to determine appropriate mitigation measures with members of the community and opportunities for this group to benefit from the proposed development.

Negative impact: Poor public transport and active travel access to the site

- 7.73 The site of the proposed development has low public transport accessibility and it is expected that most visitors will arrive by coach or private car.
- 7.74 This will potentially have a negative impact on individuals who do not have access to a private car either because of affordability issues or they have a protected characteristic which means they are unable to drive (for example, children, disabled people and older people). The lack of access to the site by public transport or active travel modes may potentially disadvantage these groups by creating a barrier to participation.
- 7.75 A travel plan was developed and submitted for the original planning application. The aim of this was to reduce single car occupancy travel to the site. The travel plan could be developed further to explore the following actions:
- Liaison with TfL and/or private transport operators to improve bus/shuttle access from nearby train and tube stations. This could include relocating bus stops closer to the site access road if feasible and informing drivers on the route of the new facility.
 - Provide staff with e-bikes or bikes for travelling to work and for travel around the site. These could potentially be integrated with an existing bike share/hire scheme. This could include foldable bikes for integrating with public transport journeys.
 - Bikes could also be loaned to young people attending HWSFAC for courses or skills development. The bikes could be sourced from recycling centres and maintained by Council run bike maintenance services.
 - Documents should refer to 'wheeling' as well as walking and cycling. Many disabled people and older people use wheeling (wheelchairs, motor scooters, mobility aids etc) as a form of getting around. The design of the proposed development should consider what this means in terms of accessibility and parking at the facility. This should apply to paths on site as well as access to the site.

8. Recommendations and conclusions

Recommendations

- 8.1 Table 8-1 below sets out recommended actions to strengthen or enhance positive impacts and to mitigate against potential adverse equality impacts associated with the proposed development. By following these recommendations and developing a set of clear mitigation measures as part of the overall design and development of the project going forward, the Council will be continuing to demonstrate due regard to the PSED.
- 8.2 Appendix A also sets out a summary of how the barriers to participation for each group are being addressed through planned mitigation and the recommended further actions.

Table 8-1 Action checklist

Actions
The Council should continue to follow relevant guidance and best practice documents in the delivery of the project including those contained within this report.
Design documents for the proposed development state that Inclusive Design is 'at the core of the project'. However, reference/information to accessibility and inclusive design is often lacking or placed at the end of planning and supporting documents. It is recommended to bring this element forward in documents to show its importance across the design, delivery and operation of the proposed development. The Planning Statement should include reference to the Equality Act 2010.
The Council should consider the use of the social model of disability definition in the context of the proposed development. This means referring to 'disabled people' rather than 'people with disabilities'. This implies that people are only disabled by their environment and not their physical or mental health status. This definition would support the vision for inclusive design.
Where possible, protected groups highlighted within this report should be included on design and construction teams, for example women, disabled people, ethnic minority groups. Members of target user groups should also be included in consultation activities about detailed designs in addition to user group leaders.
An accessibility and inclusion audit should be undertaken frequently (preferably by a Registered Access Consultant) to ensure that the site is accessible once in operation.
<p>To address the low PTALs score, the travel plan could be developed further to explore the following:</p> <ul style="list-style-type: none"> • Liaison with TfL and/or private transport operators to improve bus access from nearby train and tube stations. This could include moving bus stops closer to access road. • Providing staff and young people with e-bikes or bikes to use to get to site and for travel around site. These could be integrated with existing bike share or bike maintenance programmes. This could include Brompton bikes (or similar) for integrating with public transport journeys. • Documents should refer to 'wheeling' as well as walking and cycling. Many disabled people and older people use wheeling as a form of getting around and design should consider what this means in terms of accessibility and parking at the facility. This should apply to paths on site as well as access.
The Council should consider use of 'small group' changing rooms rather than 'family' to make the rooms more accessible to other groups of people who may wish to use them but are not part of a family group.
The proposed development could include a quiet space for multi-faith prayer rooms (or wellbeing rooms) that can be used by visitors and staff. This is important given the diverse religions and faith

Actions
groups represented in Hillingdon. However, there would be need to have separate areas for baby feeding.
<p>User and Staff surveys should be undertaken to gain feedback on the facilities and overall experience at HWSFAC. This should include diversity monitoring to understand differences between protected characteristic groups.</p> <p>The findings should be used to make improvements and inform the accessibility audit, Skills, Employment and Education plan and social impact reporting.</p>
<p>A Skills, Employment and Education Plan should be prepared for both construction and operational stages of the project. This should include;</p> <ul style="list-style-type: none"> • Procurement requirements for contractors including accreditation as a Disability Confident Employer and targets for recruitment of local people, training and upskilling the workforce with specialist techniques, work experience placements and supporting with careers events/activities of local education providers. • Actions to support recruitment of diverse groups for permanent staff, seasonal workers and volunteers. • Working with local education providers to provide work placements and volunteering opportunities, especially for SEND adults and those on an ECHP. • Opportunities to procure a training provider to co-ordinate a comprehensive training and skills programme at HWSFAC.
<p>An NSPCC Safeguarding Assessment is being completed and the recommendations from this should be actioned. A policy should be developed to cover, employees, volunteers and visitors.</p>
<p>During construction, the Council should work with contractors to develop, implement and monitor social value plans and activities to maximise employment and training related social value and social outcomes of the project. The outcomes of this should contribute to the wider social impact evaluation (see Appendix B).</p> <p>Construction Management Plans for the proposed development should take into account specific measures to minimise impacts on existing users of Broadwater Lake and the Gypsy Roma Traveller site located on the access road.</p>
<p>Demonstrate the social impact created through the project by producing an annual social impact report for the facility. This can be used to identify key benefits and areas of improvement for future years.</p> <p>The data collected should be based on quantitative and qualitative data collection including staff and visitor feedback.</p> <p>Appendix B provides an example of indicators that could be measured. Lessons learned would also help the Council (and others) in the design and delivery of other projects.</p> <p>To create more local opportunities there is an opportunity to work with students at Brunel University⁷⁰ to undertake research for the social impacts work and develop the plan. This will also help to further research in inclusive sport at the university.</p>
<p>Prepare information about HWSFAC in multiple languages and in a multi-modal format, to ensure it is accessible to all groups planning a visit to the facility. This should contain clear information about toilets, changing rooms and sleeping accommodation facilities. A video walkthrough such as https://calvertlakes.org.uk/accessible-site-tour/ would allow groups to understand the layout and dimensions prior to their visit.</p> <p>Media should include representation of all groups in order to encourage participation</p>

⁷⁰ <https://www.brunel.ac.uk/occupational-therapy/research-and-phd-programmes/kidspace/inclusive-sport>

Actions
<p>Consultation and engagement has been undertaken with the public, stakeholder and end-user groups. This has helped provide user input into the design and function of the facility to support inclusivity and to improve on existing facilities. Engagement activities should continue throughout detailed design, construction and operation stages for example:</p> <ul style="list-style-type: none"> • Design - continued input from user groups and access consultants • Construction - engagement should be undertaken with local residents, businesses and users of the lake to inform of timescales for construction activities. Specific activities should be undertaken with the Gypsy Roma Traveller community on the access road to the site and existing users of Broadwater Lake. • Operation - users should be engaged with feedback forms for visitors and staff that can be used for continuous improvement and social impact reporting. • Additionally, engagement should be undertaken with disabled people and others for whom physical activity participation is low in the area to promote the facility and identify any barriers to use.

Conclusions

- 8.3 The proposed development demonstrates a strong commitment to promoting equality of opportunity and has referred to extensive accessibility guidance to design facilities for all users. There are few outdoor activity centres in the UK providing accessible day and overnight facilities to the level of HWSFAC and it has the potential to become an exemplar of accessible and inclusive design.
- 8.4 The HWSFAC aims to provide land and water based activities and facilities for a wide range of diverse users, including children, young people and disabled people. The facility is designed to accommodate various groups, including school groups, scout and girl guide groups, cadets, individuals with additional needs, sailing club members, families, and seasonal staff.
- 8.5 The proposed development will result in excellent improved quality and more accessible outdoor activity centre in Hillingdon. This replaces outdated and non-compliant facilities at the existing HOAC site and provides brand new facilities at Broadwater Lake. The new facility will include multiple camping areas for different groups depending on accessibility and needs. It will provide a range of accessible facilities including Changing Places toilets, SuperLoos, accessible toilets, accessible family changing rooms, catering to individuals and groups with different needs. The design also provides accessible accommodation for employees.
- **Reduced physical, social and cultural barriers to physical and outdoor activity** for those who have low levels of participation such as women and girls, ethnic minority groups and disabled people.
 - **Improved physical and mental health outcomes** for local residents by promoting higher levels of physical and outdoor activity and access to nature. Hillingdon has low levels of physical activity and high levels of obesity amongst both adults and children and as such the facility provides can help to address these issues.
 - **Creation of employment and volunteering opportunities** - this includes temporary jobs during the construction period, as well as permanent and seasonal jobs during operation. The accessible and inclusive design of staff facilities and accommodation makes working at HWSFAC accessible for disabled people, young people and women. Targeted procurement and recruitment strategies as part of a Skills, Employment, And Education Plan may help to ensure that these opportunities benefit those groups such as young people, ethnic minority groups and disabled people.

- **Environmental education:** The project aims to educate children and young people about the environment and local ecology, promoting care for the environment through various activities.

The Equality Act 2010 and the Public Sector Equality Duty

The Council must demonstrate due regard to the aims of the PSED and wider requirements of the Equality Act 2010 in the delivery of the proposed development. This includes:

- **PSED Aim 1:** To eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
- **PSED Aim 2:** To advance equality of opportunity between people who share a protected characteristic and those who do not by:
 - Removing or minimising disadvantages suffered by people due to their protected characteristics;
 - Taking steps to meet the needs of people from protected groups where these are different from the needs of other people; and
 - Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.
- **PSED Aim 3:** Foster good relations between people who share a protected characteristic and those who do not.

- 8.6 The predominant target user groups of the HWSFAC are those with the shared protected characteristics of age (children and young people) and disability. Many users may also experience intersectional disadvantage due to a combination of multiple protected characteristics that can further worsen barriers to participation for example, those from specific ethnic or religious groups, women/girls and trans people.
- 8.7 As a new build development, there is an opportunity to design infrastructure and associated facilities so that it inclusive to all groups from opening. Without the commitment to inclusive design and appropriate supporting measures, the Council would be at risk of discriminating against or disadvantaging groups who are unable to use the centre's facilities or participate in activities because of their protected characteristics. There is no objective justification for providing worse impacts on someone with a protected characteristic than on those without, given that the target end user groups of the centre are those that most often face barriers to participation.
- 8.8 Overall, the Council is addressing the **second aim of the PSED** by taking steps to meet the needs of different groups so that they can participate in activities provided at the centre. Target user groups of HWFSAC often face the most barriers and have disproportionately low levels of participation in physical activity, access to nature, employment and learning new skills.
- 8.9 Consultation and engagement activities with user groups to date has identified specific requirements based on the lived experience of these groups. A full review of existing facilities at HOAC and other centres has been undertaken and has identified areas for improvement and best practice.
- 8.10 As a result of actions to address the second aim of the PSED, the Council is paying due regard to the **first aim of the PSED**, seeking to eliminate discrimination and barriers to participation through inclusive design. Relevant guidance is being followed to create an accessible and inclusive centre for all user groups. The outdoor activities provided at HWFSAC have been selected so that all activities are accessible to everyone including disabled people. Facilities

such as overnight accommodation have also been designed in collaboration with end-user groups to ensure the needs of a range of groups are met.

- 8.11 The flexible layout of the buildings and volume and range of facilities **is fundamental** to the inclusive design of the proposed development. This flexibility allows for toilets, changing facilities, food preparation areas, sleeping accommodation, storage facilities and activity spaces that can be designated and adapted according to the specific requirements of individual user groups. For example, the provision of large, family and individual changing rooms allows for different arrangements depending on the sex and age profiles of the groups and further specific intersectional needs relating to race, religion, sex or gender reassignment. This reduces the risk of discrimination and disadvantage whilst advancing equality of opportunity between those who share a protected characteristic and those who do not.
- 8.12 In line with the **third aim of the PSED** the proposed development supports good relations between those who share a protected characteristic and those who do not, by allowing a diverse range of groups to use the centre at the same time without negatively impacting on other groups. In addition, by creating inclusive spaces for working, learning and other activities where everyone can participate there is an opportunity to encourage positive interaction between groups, increase understanding and reduce bias and prejudice.
- 8.13 The requirements of the Equality Act 2010 are about how overall services and experience are provided rather than the solely the design of the building. Therefore it will be necessary to ensure that effective operational, workforce and management policies, procedures and processes are implemented to eliminate discrimination as well as to protect employees, volunteers and guests of the centre from harassment and victimisation. This includes, but is not limited, to workforce policy and plans, procurement of goods and services, safeguarding, ongoing maintenance, social benefits plans and health and safety policy and plans.
- 8.14 Advancing equality of opportunity will also be dependent on supporting measures to encourage participation. For example, ensuring activities are affordable, information and communication is clear and accessible, employment, volunteering and training opportunities are inclusive and that public and active transport accessibility to the site is improved.
- 8.15 No direct operational negative impacts have been identified at this stage of assessment. However, there are some potential negative equality impacts resulting from the construction of the proposed development. Construction related environmental impacts have the potential to negatively impact children, older people, and disabled people who are more sensitive to the adverse health effects of such impacts. The Gypsy Roma Traveller community and current users of the lake may be impacted during construction. Construction Management Plans will need to account for these groups in the development of mitigation measures. The proposed development should also provide improved facilities for these groups in the long-term.
- 8.16 The recommended actions set out in Table 8-1 should be considered as part of the design, construction and operation of the proposed development to avoid unintended negative impacts on groups. This includes barriers to participating in the services provided by the proposed development.
- 8.17 The PSED is an on-going process and as such it is important to consider the EqIA as a live document, to be updated, refreshed and recommended actions monitored on a regular basis.

Appendix A: Barriers to participation and actions

	Children (including families)	Young People	Older People	Women and girls	Disabled people	Ethnic groups	Religious groups	Trans people	LGBQ+ people	Pregnant women	Low income households	Actions to remove or reduce barriers
Physical/accessibility												
Accessible infrastructure	✓		✓		✓					✓		Planned actions: <ul style="list-style-type: none"> • Use of relevant inclusive design guidance • All activities to be designed for all users • Accessible wheelchairs for moving around site • Flexible use of space and facilities • Changing Places and accessible toilet provision • Accessible accommodation for staff • Provision of accessible parking spaces and access for accessible vehicles close to main entrance • Quiet spaces allocated throughout site • Rest areas/covered shelters to be provided Other recommended actions: <ul style="list-style-type: none"> • <i>An accessibility and inclusion audit should be undertaken frequently (preferably by a Registered Access Consultant) to ensure that the site is accessible once in operation</i> • <i>Spaces for prayer/worship</i>
Accessible facilities such as toilets, showers, changing rooms, accommodation	✓		✓		✓					✓		
Accessible parking or access to site for accessible vehicles					✓					✓		
Seating/rest areas	✓		✓		✓					✓		
Quiet private spaces	✓				✓		✓			✓		

	Children (including families)	Young People	Older People	Women and girls	Disabled people	Ethnic groups	Religious groups	Trans people	LGBQ+ people	Pregnant women	Low income households	Actions to remove or reduce barriers
Social/personal barriers												
Feeling unwelcome, fear of judgement				✓	✓	✓	✓	✓				Planned actions: <ul style="list-style-type: none">• Code of conduct to be developed for site• Private and accessible accommodation for workers• Council HR policies to be implemented• Safeguarding policy to be implemented• Flexible toilets, changing rooms and shower configurations to allow user groups to define how space is used depending on needs of the group.• Individual changing rooms included in designs• Quiet spaces allocated throughout site Other recommended actions: <ul style="list-style-type: none">• <i>Skills, Employment and Education Plan - Employment and recruitment policies to increase employee and volunteer representation amongst affected groups</i>
Confidence, low self-esteem				✓	✓			✓				
Representation				✓	✓	✓		✓				
Lack of opportunity				✓	✓	✓		✓				
Fear of harassment				✓	✓	✓	✓	✓	✓			
Feeling and being unsafe	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
Lack of privacy				✓		✓		✓				
Lack of skills and experience		✓		✓	✓							
Cultural barriers												

	Children (including families)	Young People	Older People	Women and girls	Disabled people	Ethnic groups	Religious groups	Trans people	LGBQ+ people	Pregnant women	Low income households	Actions to remove or reduce barriers
Access to dietary needs	✓				✓	✓	✓			✓		Planned actions: <ul style="list-style-type: none"> • Separate food preparation and storage areas planned
Cultural and religious practices and events						✓	✓					Planned actions: <ul style="list-style-type: none"> • Individual changing rooms included in designs
Cultural modesty restrictions e.g. dress and public behaviours				✓		✓	✓					Other recommended actions: <ul style="list-style-type: none"> • <i>Prepare information about HWSFAC in multiple languages and in a multi-modal format, to ensure it is accessible to all groups planning a visit to the facility.</i> • <i>Information about HWSFAC to represent different groups</i>
Practical barriers												
Lack of transport				✓	✓	✓					✓	Planned actions: <ul style="list-style-type: none"> • Location is accessible to large population within 60 minute drive time
Childcare				✓								<ul style="list-style-type: none"> • Travel plan being developed • Medical facilities to be available on site including storage of medication, oxygen cylinders and other equipment
Time				✓								<ul style="list-style-type: none"> • Separate overnight accommodation available for medical support staff

	Children (including families)	Young People	Older People	Women and girls	Disabled people	Ethnic groups	Religious groups	Trans people	LGBQ+ people	Pregnant women	Low income households	Actions to remove or reduce barriers
Medical and health support					✓					✓		<ul style="list-style-type: none">Facilities being designed for families with children of all ages including family changing, toilets and spaces for breastfeeding. Other recommended actions:
Trained staff					✓	✓			✓			<ul style="list-style-type: none"><i>Skills, Employment and Education Plan – Staff to receive inclusion training.</i>
Communication												
Lack of information about services and opportunities				✓	✓	✓		✓				Other recommended actions: <ul style="list-style-type: none"><i>Prepare information about HWSFAC in multiple languages and in a multi-modal format, to ensure it is accessible to all groups planning a visit to the facility.</i><i>Information about HWSFAC to represent different groups</i><i>Employees and instructors to receive inclusion training including on how to make instructions accessible for different groups and needs.</i>
Accessible information			✓		✓							
Language barriers						✓						
Instructions	✓				✓	✓						
Affordability												

	Children (including families)	Young People	Older People	Women and girls	Disabled people	Ethnic groups	Religious groups	Trans people	LGBQ+ people	Pregnant women	Low income households	Actions to remove or reduce barriers
Lack of affordable services											✓	Planned actions: <ul style="list-style-type: none"> Proposed design aims to keep maintenance costs to a minimum which in turn will keep cost lower for users. Travel plan to promote walking and cycling Site is within 60 min drive time catchment for 17% of all England's school. This makes it an option for day trips. Other recommended actions: <ul style="list-style-type: none"> <i>Provide equipment and items for use by groups on site.</i>
Affordable transport options											✓	
Cost of equipment and clothing											✓	

Appendix B: Example social impact indicators

Theme	Indicator/outcome	Measure
Health and wellbeing	Access to physical activity for those who are least active	No. of visitors who are Disabled under the Equality Act 2010
		No. of visitors aged under 18
		No of visitors from ethnic minority groups
	Increased health and wellbeing for visitors	% of visitors who reported feeling happier and healthier after the visit
	More sustainable transport options to the site	No. of staff travelling to work by walking, cycling, wheeling or public transport
		No. of visitors travelling to site by walking, cycling, wheeling or public transport
Community Cohesion	More community and school groups taking part in outdoor activity	No. of community groups supported
		No. of school groups/student visits
	More outdoor activity opportunities for local people	No. of visitors from the local area
	More opportunities for deprived and disadvantaged communities	No. of visitors from 10% most deprived areas
	More volunteering opportunities	No. of volunteer placements
Employment, Skills and Education	More community cohesion	% of visitors who felt included at the centre
	Local employment opportunities	No. of local people employed at the centre
		No. of work or volunteer placements for SEND students ⁷¹
	More employment opportunities for underrepresented groups	No. of people employed who are disabled under the Equality Act 2010
		No. of people aged under 24 obtaining leadership qualification
		No. of disabled people obtaining leadership qualification
Accessibility	More people gaining new skills and qualifications	% of visitors taking part in an activity they have never done before
		% of visitors who felt they had learned more about the environment and nature as a result of their visit
	More people educated about the environment	No. of disabled people staying overnight
		No. of disabled people staying overnight who have never stayed away from home before
	Access to outdoor activity for disabled people	% of accessible activities as a % of all activities
		No. of disabled people taking part in water sport activities

⁷¹ Aligns with Hillingdon Joint Health and Wellbeing targets to reduce barriers to employment for adults with SEN, LD or autism and support people to access opportunities. Social care and wellbeing - Hillingdon Council