



National Highways Planning Response (NHPR 22-12) Formal Recommendation to an Application for Planning Permission

From: South East Divisional Director
Operations Directorate
South-East Region
National Highways
PlanningSE@nationalhighways.co.uk

To: London Borough of Hillingdon (FAO Case Officer: Michael Briginshaw)
PlanningEConsult@Hillingdon.Gov.UK

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 2382/APP/2023/2906

Location: Broadwater Lake, Moorhall Road, Harefield

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

National Highways Reference: NH/23/03737

Referring to the full planning application consultation referenced above in the vicinity of M40 J1, dated 15 November 2023, notice is hereby given that National Highways formal recommendation is that we:

- a) offer no objection (see reasons at Annex A);
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~

~~e) recommend that planning permission not be granted for a specified period (see reasons at Annex A);~~

~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to PlanningSE@nationalhighways.co.uk.

Signature: 	Date: 6 December 2023
Name: Diana Ngobi	Position: Assistant Spatial Planner
National Highways Bridge House, 1 Walnut Tree Close, Guildford, GU1 4LZ	

Annex A **National Highways' assessment of the proposed development**

National Highways was appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

National Highways has undertaken a review of the Transport Assessment (TA) and Travel Plan prepared on behalf of London Borough of Hillingdon by Robert West, accompanying a full planning application submission. National Highways interests relate to the operation and safety of the SRN, and in the case of the proposed site, this includes the M40 J1 and M25 J16. We are interested as to whether there would be any adverse safety implications or material increase in queues and delays on the SRN as a result of this development.

¹ Where relevant, further information will be provided within Annex A.

The Site is located circa 4km from the SRN and the assessment undertaken anticipates the proposed development will generate 31 two-way vehicle trips in the AM peak hour and 17 two-way vehicle trips in the PM peak hour during peak months of operation. Given the proposal is for the relocation of existing facilities currently operating at the nearby Dews Lane to this new site, any of these trips which use the SRN are considered already likely to be on our network and the trip distribution is unlikely to significantly change with the change in location. We also note the use of shared transport where possible and other travel planning measures to reduce the number of total trips to/from the site.

Overall, the anticipated traffic generation is not expected to impact upon our network.

We are satisfied that the proposal would not materially affect the safety, reliability and/or operation of the strategic road network (SRN) (the tests set out in DfT Circular 01/2022 and DLUHC NPPF2023 [particularly paras 110 to 113]).

Recommendation

National Highways raises no objections.

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.