ARUP

Hillingdon Council

Hillingdon Water Sports Facility and Activity Centre - Broadwater Lake

Environmental Impact Assessment Scoping Opinion

Reference: 294428-01

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1. Introduction

1.1 Background

1.1.1 Ove Arup & Partners Limited ('Arup') has been appointed by Hillingdon Council Strategic and Major Applications Team ('HC'), as the Local Planning Authority ('LPA'), to provide technical support responding to a request by Hillingdon Council Development Team (the 'Applicant'), for a Scoping Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017[1], as amended[2] ('the EIA Regulations'). Under the EIA Regulations, where a Scoping Opinion has been issued, an Environmental Statement (ES) must be based on that opinion.

1.1.2 The Scoping Opinion has been requested in relation to the proposed redevelopment of approximately 80 hectares (ha) of land located at Broadwater Lake, Moorhall Road in the borough of Hillingdon.

1.1.3 This Scoping Opinion stipulates the information to be provided in the ES. It is based on the contents of the Scoping Report prepared by Quod that was validated by the LPA on 23 February 2023 (reference: 2382/APP/2023/525) (the 'Scoping Report') as well as the 'Addendum to EIA Scoping Report – Hillingdon Water Sports Facility and Activity Centre' (the 'Scoping Report Addendum') received on 25 April 2023. This Scoping Opinion should be read in conjunction with the Scoping Report and Addendum.

1.1.4 This Scoping Opinion has adopted the overall approach that, subject to the comments contained herein, the scope, methodology and approach proposed in the Scoping Report is deemed to be appropriate and should be followed by the Applicant. For those topics scoped in, any required additions and variations are provided in a table on a topic sub-topic basis. The sub-topics mirror those identified in the Scoping Report, with additional sub-topics included, where relevant.

1.1.5 The information contained within this Scoping Opinion is based upon that available at the time of preparation. Should the development proposals change, or additional consultation responses be received, this may require a re-evaluation of the proposed EIA scope.

1.2 Structure of this Scoping Opinion

1.2.1 This Scoping Opinion is structured as follows:

- Section 1 provides a summary of the proposed development and responses received to the Scoping Report consultation.
- Section 2 discusses the scope and content of the introductory ES chapters, the Cumulative Effects Assessment (CEA) and other environmental aspects that sit outside the EIA scoping process but will inform the proposed development design, ES and technical assessments.

[1] The Town and Country Planning (Environmental Impact Assessment) Regulations 2017
Available at: http://www.legislation.gov.uk/uksi/2017/571/contents/made [Accessed May 2023]
[2] The Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018 Available at: https://www.legislation.gov.uk/uksi/2018/695/regulation/2/made [Accessed May 2023]

- Section 3 provides commentary on topics to be scoped out of the ES, either as a result of justification provided within the Scoping Report, or from the views of the LPA, Arup as its advisor for selected environmental topics and statutory consultees.

- Section 4 presents the general EIA and topic requirements to be included within the ES and identifies where additional aspects beyond those stated in the Scoping Report are required.

1.3 EIA scoping requirements

1.3.1 The EIA Regulations require the following information when seeking a Scoping Opinion:

> *"Scoping opinions of the local planning authority*
>
> *15.—(1) A person who is minded to make an EIA application may ask the relevant planning authority to state in writing their opinion as to the scope and level of detail of the information to be provided in the environmental statement (a "scoping opinion").*
>
> *(2) A request under paragraph (1) must include—*
>
> *(a) in relation to an application for planning permission—*
>
> *(i) a plan sufficient to identify the land;*
>
> *(ii) a brief description of the nature and purpose of the development, including its location and technical capacity;*
>
> *(iii) an explanation of the likely significant effects of the development on the environment; and*
>
> *(iv) such other information or representations as the person making the request may wish to provide or make;"*

1.3.2 In terms of the Scoping Opinion, subsection 15 (6) of the EIA Regulations requires the following:

> *"(6) Before adopting a scoping opinion the authority must take into account—*
>
> *(a) any information provided by the applicant about the proposed development;*
>
> *(b) the specific characteristics of the particular development;*
>
> *(c) the specific characteristics of development of the type concerned; and*
>
> *(d) the environmental features likely to be significantly affected by the development."*

1.4 The proposed development

1.4.1 The area of land proposed for redevelopment (the 'site') is bound by the river Colne to the north and west, the London Loop/Colne Valley trail and Grand Union Canal to the east and Harefield Moor Lake to the south. South Harefield village is located immediately east of the Grand Union Canal and Uxbridge town is approximately 5km south of the site.

1.4.2 The area of the site known as the 'south parcel' is bound by Harefield Moor Lake to the north, Moorhall Road to the south and Korda Lake to the west. The High Speed Two (HS2) construction site is also located to the west.

1.4.3 The area of site known as the 'east parcel' is bound by the Grand Union Canal to the west, a logistics site to the south and South Harefield to the east.

1.4.4 The proposed planning application boundary is shown in Figure 1.2 of the Scoping Report. The ES figure should be updated to show to location of the various parcels, i.e., 'south parcel' and 'east parcel' within the planning application site.

1.4.5 The site currently comprises Broadwater Lake (approximately 62ha) which includes a peninsula to the south and 'lagoon' to the east of the peninsula, and a number of smaller islands bordered by trees and scrubs. The site also includes an area of land to the north which includes several small buildings, comprising the Broadwater Sailing Club (BSC) and Broadwater Rowing Club (BRC) club house, an unnamed access road and a single carriageway bridge over the Grand Union Canal.

1.4.6 A full planning application will be submitted to seek permission for:

- a new water sports facility and activity centre (up to two storeys with a maximum height of 6.2 metres (m)) that will be a new base for the Hillingdon Outdoor Activity Centre (HOAC) (currently located approximately 1.5km south of the site and closed since October 2020), BSC and BRC (currently located in the north of the site and operational) to be located in the north-western corner of the peninsula – this building will also be used for staff accommodation between April and September;
- up to three new pontoons proposed in the lake to the north of the main building – it should be specified whether these pontoons will be fixed or floating;
- one rowing boat shed located in the north of the peninsula;
- up to 400 boat parking spaces located in the north and east of the peninsula (to be used year-round);
- one workshop for the maintenance, repair and storage of equipment located in the east of the peninsula (to be used year-round) – the height of this workshop should be specified;
- an open activity area, camping ground and specific areas for activities located in the south of the peninsula to be used from April to September; activities in these areas will include high ropes, low ropes, zip wires and other woodland-based activities;
- seven open-sided, steel frame covered activity shelters to support land activities;
- up to 150 vehicle parking spaces and coach parking located at the southern extent of the peninsula;
- a stand-alone hut with facilities for anglers comprising accessible toilet located in the south of the peninsula;
- a new energy centre to include all central plant associated with the mechanical and electrical services, located in the east of the peninsula;
- photovoltaic panels located at both ground and rooftop locations; and;
- demolition of the existing BSC club house and removal of associated single-storage buildings at the north of the site.

1.4.7 Access to the development will be from the existing Moorhall Road in the south of the site. The existing access road will be subject to the following improvements:

- become a two-way road;

- an extension through the east side of the peninsula and split in the north to the east and west;
- parallel pedestrian footpath from the entrance of the car park to the primary facilities; and
- enhanced T-junction improvements.

1.4.8 The horizontal steel section of the existing bridge over the Grand Union Canal will be removed and potentially refurbished or completely replaced if necessary.

1.4.9 In addition to the above, the proposed development will also involve physical works to Broadwater Lake including:

- extension to peninsula, islands and other modifications to lakeside habitats; and
- localised dredging to increase lake depth and facilitate sailing from launch locations.

1.4.10 The proposed development chapter of the ES should:

- include greater detail on the proposed landscaping plans, i.e., location and species of tree planting and habitat creation;
- clarify if the activities on site, once the proposed development is operational, are a like-for-like replacement or if activity levels are anticipated to significantly increase.

1.4.11 The proposed construction programme is anticipated to be approximately 18 months with the completed development expected to open towards the end of 2024 (Q4 2024). The proposed construction programme should be reviewed and updated to align with the timing of the planning submission and ensure assessments reflect the latest timescales.

1.5 Consultation

1.5.1 Consultation undertaken by the LPA on the Scoping Report is summarised in Table 1 and is reflected in this Scoping Opinion. Full consultation responses are set out in Appendix B and any further responses will be forwarded to the Applicant for consideration in the preparation of the ES.

Table 1 Summary of consultation responses to the EIA Scoping Report

Consultee	Summary of response *(italic* text denotes direct quotation)
Hillingdon Council Air Quality	The air quality assessment should include consideration of potential effects from dust, particulate matter and construction traffic/plant emissions. An air quality neutral and air quality positive assessment should be prepared.
Hillingdon Council Noise	Agree that noise and vibration can be scoped out of the EIA and a stand-alone assessment should be submitted.
Urban Design Officer	Summary of key points: • *The EIA needs to include a thorough evaluation of the landscape character identifying inherent attributes […] will form the preliminary stages of the LVIA with assessment of the sensitivity of the site and its robustness to change that are derived from the landscape value of the site.* • *It should be demonstrated that the scale and extent of development within the site are sensitive to the location and designed to avoid or minimise adverse impacts on the designated areas.* • The LVIA should also include an assessment from a viewpoint from the Old Orchard Pub.

Consultee	Summary of response (*italic* text denotes direct quotation)
	• All three viewpoints should be presented as verified visualisations of the scheme in accordance with the Landscape Institute's guidance note.
Three Rivers District Council	No comments received.
Buckinghamshire Council	No comments received.
Natural England	Summary of key points: • *Potential impact of the proposal upon sites and features of nature conservation interest and opportunities for nature recovery and biodiversity net gain should be included in the assessment.* • *The ES should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSI and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects. The consideration of likely significant effects should include any functionally linked land outside the designated site.* • *The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves […] set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks*. • *The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats).* • *The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.* • The ES should consider potential impacts on access land, common land and public rights of way. • *The following issues should be considered and, where appropriate, included as part of the ES:* – *The degree to which soils would be disturbed or damaged as part of the development.* – *The extent to which agricultural land would be disturbed or lost as part of this development.* • *The ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans.* • *Consider environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains*.
High Speed Two	Summary of key points: • Consideration should be given to the publicly available, relevant HS2 ecological survey and monitoring data, notably in relation to bats, waterfowl and breeding birds. • Areas of proposed land reclamation / island creation partially clash with HS2's proposed gravel areas/rafts – the design and areas of habitat creation should be developed in consultation with HS2 to ensure HS2 remain compliant with its own environmental obligations. • General consistency review needed in the overall reporting of potential impacts on various protected species to ensure likely significant effects are clear. • Traffic management should be coordinated with HS2 contractors, with engagement to be specifically undertaken in relation to utility connections.
Environment Agency	Summary of key points: **Flood risk** • *stronger wording and discussion around the impact of climate change*. **Ecology**

Consultee	Summary of response *(italic* text denotes direct quotation)
	• *Construction and operational impacts to the SSSI will need to be carefully considered within the Mitigation Enhancement and Management Plan and should be agreed with both Natural England and Herts and Middlesex Wildlife Trust.* • *The development should provide all evidence that every measure to avoid the use of this significant site as part of any planning application proposed. Without this evidence, it is likely that the application will be refused due to its impact on nature conservation.* • *[…] a water vole survey was undertaken in November 2022. This is not the optimal survey season for this species and further surveys will be required to support the EIA.* • *Surveys for all species may require updating to ensure they meet the CIEEM validity guidelines.* • Water Framework Directive Assessment is required for this development. **Contamination** • Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards. • *If the total quantity of hazardous waste material produced or taken off-site is 500kg or greater in any 12-month period, the developer will need to register with the EA as a hazardous waste producer.* **Waste** • *All material deposited within the historic landfill remains controlled waste and must comply with waste legislation.* • *Any import or alteration of the landform or piling within the waste should be regarded as a waste activity and requires an environmental permit.* • *[…] dredging, creation of new land and islands…will require Environmental Permits from the EA.* • *[…] strongly recommend the use of flood resilience measures.*
Thames Water	Summary of key points: **Waste** • Consider the development's demand for Sewage Treatment and network infrastructure both on and off site and can it be met. • Consider the surface water drainage requirements and flood risk of the development both on and off site. • Build – out/ phasing details to be provided to ensure infrastructure can be delivered ahead of occupation. • Consider the piling methodology and whether it will adversely affect neighbouring utility services. **Water** • Water supply is covered by the Affinity Water Company. • The development boundary falls within a Source Protection Zone for groundwater abstraction. The EA's approach to groundwater protection should be acknowledged.
Transport for London	Summary of key points: • A full Heathy Streets Transport Assessment (TA) should be undertaken. This should include an Active Travel Zone (ATZ) assessment. • The proposed development should seek to connect, and where possible, enhance the existing active travel network. • A robust multi-modal trip generation should be included within the TA… contributions towards mitigating the impact of the proposed development on the surrounding transport network may be required in line with Policy T4. • A Stage 1 Road Safety should be undertaken for any changes proposed to the vehicle access. • Proposed access should be designed in line with the Mayor's Healthy Streets approach. • The quantum of car parking provision at this site should seek to support a strategic modal shift, as identified in Policy T1. A reduction in the quantum of car parking is sought.

Consultee	Summary of response *(italic* text denotes direct quotation)
	• Cycle parking should be provided in line with the standards identified within Policy T5 of the London Plan and London Cycle Design Standards (LCDS), referred to in Policy T5. • A framework construction logistics plan (CLP) should be provided. This should contain detail on the measures that will be implemented to ensured that the proposed construction will not impact on the safe and efficient operation of the adjoining transport network. It should also demonstrate how construction activity will be carried out in accordance with the Mayor's Vision Zero and Healthy Streets approach. • An outline Delivery and Servicing Plan (DSP) should be provided. • A framework Travel Plan for all proposed uses should be provided.
Heathrow Airport	Any proposal that incorporates wind turbines must be assessed in more detail to determine the potential impacts on aviation interests. This is explained further in Advice Note 5, 'Renewable Energy & Impact on Aviation' (available at http://www.aoa.org.uk/policy-campaigns/operations-safety/).
Civil Aviation Authority	No comments received.
Historic England	Summary of key points: • *[…] it should be possible to avoid a significantly adverse impact on archaeology but further information would be needed to inform a planning application and decision*. • *[…] the following further studies should be undertaken to inform the preparation of proposals and accompany a planning application:* **Evaluation** • *Archaeological field evaluation involving exploratory fieldwork to determine if significant remains are present on site and if so, to define their character, extent, quality and preservation.* **Desk Based Assessment** • A report to inform planning decisions using *existing information to identify the likely effects of the development on the significance of heritage assets, including considering the potential for new discoveries and effects on the setting of nearby assets. An assessment may lead on to further evaluation and/or mitigation measures. All desk-based assessments should include a search of the Greater London Historic Environment Record.* • *[…] include maps with a survival and geo-archaeological deposit model. Boreholes and geotechnical information will be invaluable and if undertaken for the application should be monitored by an archaeologist.* • *HS2's previous investigations and modelling in the Colne Valley should be examined as should evidence for the patterning of previous discoveries in relation to historic topography/geology to highlight areas of particular potential.*
Colne Valley Regional Park	Summary of key points: • *Broadwater Lake is of national and regional importance for nature conservation.* • *Recreation will have a severe impact on biodiversity.* • *The previous application at Denham Quarry, was a far better option, merely requiring a few, very minor adjustments.* • *Future sailing and rowing activities will be based in the southern part and use most of the lake, but this appears to be the more sensitive part of the SSSI…will be more intense and have a much larger impact on the ecology, particularly on overwintering birds.* • *The proposal does not comply with the National Planning Policy Framework with particular reference to Policy 174.*
Herts and Middlesex Wildlife Trust	• Further information on the alternative sites assessment should be provided to justify suitability of the site and proposed design.
Canal & River Trust	Summary of key points: • *The Trust agree with […] approach taken with regards to the matters proposed to be scoped in and those which will be addressed separately as part of any future submission, or the methodologies and baselines proposed for assessments.*

Consultee	Summary of response *(italic* text denotes direct quotation)
	• *As part of any future planning application the Trust will require further details on the works proposed. This further detail should address matters such as the potential impacts on the character and appearance of the waterway, navigational safety, structural integrity, biodiversity, and accessibility.*
Utility providers (Cadent Gas)	Agree with proposed scope.
Broadwater Sailing Club	No comments received.
Harefield Tenants and Resident's Association	*If it truly follows Town and Country planning rules then it will be a good facility but it will lead to increased traffic and noise in the area that must be controlled well. There will be areas of wildlife habitat that is destroyed so wildlife must be protected from pollution and noise.*
Gerrards Cross & Uxbridge District Angling Society	No comments received.
British Carp Study Group	No comments received.

2. EIA process requirements

2.1 EIA methodology

2.1.1 EIA methodologies should adhere to the EIA Regulations and best practice EIA and topic-specific guidance, where available. With respect to the non-technical elements of the ES, the comments contained in this Scoping Opinion have been informed by the Institute of Environmental Management and Assessment (IEMA) ES Review Criteria[3] and the EC Guidance on EIA: EIS Review[4].

2.1.2 The EIA must clearly evaluate the sensitivity of the baseline environment. It must also clearly define the methods for establishing the magnitude of effects on the receiving environment.

2.1.3 The determination of significance should be informed by current best practice guidance and should be clearly explained and justified within the ES.

2.1.4 The geographic extent, duration, frequency, reversibility and probability of occurrence of each effect should be identified.

2.1.5 The terminology used in the ES should be consistent throughout.

2.1.6 In line with the EIA Regulations, the ES should make it clear that the assessment has been undertaken by competent experts[5].

2.2 Alternatives and design evolution

2.2.1 The ES should include a full description of the main alternatives considered with reference to alternative sites, layouts and designs and how environmental considerations have influenced the evolution of the design process and selection of the preferred option to be taken forward.

2.2.2 The ES should clearly state how the design has been developed to minimise the environmental impact and, where possible, deliver environmental enhancements. There should be a clear description set out in the Alternatives Sites Assessment (Section 4.5 of the Scoping Report) of how environmental factors have influenced the EIA process, selection of the preferred design option.

2.2.3 All environmental enhancements and embedded and additional mitigation measures should be clearly described with details provided on how they will be delivered, secured and where necessary, monitored.

2.3 Covid-19

2.3.1 It is possible that the recent Covid-19 government restrictions have affected the collection of baseline information or the results of the baseline surveys information i.e., these may not reflect the typical situation, for example in the case of air quality. Where this is the case, or alternative sources of data need to be used, this should be clearly

[3] IEMA (June 2016) EIA Quality Mark: Applicant Guide. Available at: https://www.iema.net/assets/newbuild/documents/EIA%20Quality%20Mark_Applicant%20Guide%20June%202016%20V6.pdf

[4] European Commission (2001) Guidance on EIA: EIS Review. Available at: http://ec.europa.eu/environment/archives/eia/eia-guidelines/g-review-full-text.pdf

[5] Regulation 18(5) of the EIA Regulations requires that the Applicant ensures that the ES is undertaken by competent experts and that the ES is accompanied by a statement from the Applicant outlining the relevant expertise or qualifications of such experts.

identified within the technical assessments relying upon this data and any assumptions or limitations clearly stated within the relevant technical ES chapter.

2.3.2 Should alternative sources of baseline data not be available, then the proposed approach or any assumptions made should be agreed with the relevant statutory consultees.

2.4 Mitigation

2.4.1 The proposed development ES chapter should include a full description of any mitigation measures that are considered to be embedded within the design. The ES should be clear what proposed mitigation the Applicant has made a binding commitment to, distinct from potential measures or aspirations which should not be relied upon in the technical assessments. All incorporated or embedded mitigation, as well as enhancement measures, should be clearly highlighted as part of the description of the proposed development. This is important in demonstrating how the scheme design and related construction and operational management arrangements have responded to anticipated effects and environmental conditions.

2.4.2 With respect to any supplementary mitigation, the means by which this will be secured and implemented during demolition, construction and operation should be clear. The ES should comment on the certainty of the mitigation measures proposed in terms of deliverability and performance.

2.4.3 The proposed development ES chapter should include key or outline construction mitigation and management controls and how they will be applied. As well as related to terrestrial construction activities, details should be provided on how the main activities associated with dredging will be managed and controlled, and how the dredged material will be transported, stored and used to create additional areas of land, as described in Section 2 of the Scoping Report Addendum.

2.4.4 The proposed timing for the implementation of the proposed mitigation measures should be stated to demonstrate that this will be delivered at the appropriate time with respect to the realisation of any potential significant environmental effects. Information should be included on site preparation and construction logistics, site access and egress, materials and waste management (including a preliminary forecast of the types and quantities of waste streams to be generated), working hours, proposed piling technique, estimate of the peak periods of daily heavy goods vehicle (HGV) movements and routing, welfare facilities, areas of excavation and land or soil remediation (where required).

2.4.5 The outline controls should later be used to define the required management framework to be implemented prior to demolition and construction works commencing as part of a detailed Construction Environmental Management Plan (‘CEMP’). An outline CEMP is to be submitted with the planning application. It is expected that the preparation of a detailed CEMP by the appointed contractor, which would update the outline CEMP, would be required by a condition to any planning permission granted. Details on the structure and contents of the CEMP are noted in Section 6 of the Scoping Report Addendum.

2.5 Monitoring

2.5.1 Schedule 4 of the EIA Regulations requires a description of any proposed monitoring arrangements. Details of any monitoring required should be included within each technical topic with measures for construction and operation, as necessary, clearly defined.

2.5.2 Proposed monitoring measures should take into consideration environmental design and mitigation measures and will be secured through planning conditions and/or Section 106 agreement obligations to any planning permission granted.

2.6 Assessment scenarios

2.6.1 The proposed construction and operational assessment scenario years should be clearly set out within the EIA methodology chapter of the ES.

2.6.2 It is currently anticipated that the proposed development will begin construction in Q3 2023 and is expected to be completed in Q4 2024. The proposed construction programme should be reviewed and updated to align with the timing of the planning submission and ensure assessments reflect the latest timescales. For some topics the relevant assessment scenarios will be based on a comparison between the baseline and completed development. Other topics areas, including transport, air quality and noise, should include interim assessment scenarios based on when a peak in demolition and construction activities is anticipated.

2.6.3 The baseline should be the existing conditions and the future baseline should be the completed proposed development plus any other cumulative schemes that will be operational. Regarding HS2, the ES will assess the following scenarios:

- Existing baseline (2022/23) - representative of existing conditions and uses (including sailing and angling) at the site, inclusive of current HS2 construction works.
- Future baseline (2025) - conditions at the site in the absence of the proposed development comprising existing uses (sailing and angling) at the site + completed HS2 Colne Valley Viaduct (no trains operating).
- Future baseline (2029) - conditions at the site in the absence of the proposed development comprising existing uses (sailing and angling) at the site + completed HS2 Colne Valley Viaduct (trains fully operational).
- Construction stage (2024) - construction stage effects of the proposed development will be assessed against the existing baseline which is inclusive of the HS2 construction works. This assessment will include reasonable worst-case construction activities of HS2.
- Operational stage (2025) - operational stage effects of the proposed development will be assessed against the future baseline (2025), i.e., the completed HS2 Colne Valley Viaduct (but no trains in operation).
- Operational stage (2029) - operational stage effects of the proposed development will be assessed against the future baseline (2029), i.e., the fully completed HS2 Colne Valley Viaduct with trains fully operating.

2.7 Cumulative effects

2.7.1 There is no standard approach to the assessment of cumulative effects. However, the Planning Inspectorate has prepared an Advice Note[6] on Cumulative Effects Assessments ('CEA') which relates to Nationally Significant Infrastructure Projects. In the absence of

[6] PINS (December 2015) Advice Note 17: Cumulative effects assessment relevant to nationally significant infrastructure projects. Available at: https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2015/12/Advice-note-17V4.pdf

any other best practice guidance on CEA, it is suggested that this approach is applied to the proposed development. If a particular component of this guidance is not deemed applicable, justification should be provided.

2.7.2 The Scoping Report sets out that likely significant effects arising from the *"cumulation with other existing and/or approved projects"* (Schedule 4, 5(e) of the EIA Regulations) will be considered. The CEA should assess effects that may arise during the proposed development's peak construction period in combination with other developments that are also under construction and identify if elevated effects are likely.

2.7.3 The following selection criteria have been developed by Quod and used to identify cumulative schemes or committed developments:

- schemes which are to be built-out at the same time as the proposed development and with a defined planning and construction programme;
- schemes spatially linked to the development (within 1km of the site boundary);
- schemes considered to be an EIA development and for which an ES has been submitted with the planning application;
- schemes which have received planning consent from the planning authority (granted or resolution to grant); and
- schemes which introduce sensitive receptors neat to the site (but are not EIA developments).

2.7.4 The ES should set out a long list of committed developments, along with the proposed selection criteria for 'other development' and a subsequent short list and selection criteria of 'other development' (Stages 1 and 2 in the PINS Advice Note 17). Clear and robust justification should be provided in the ES for the criteria used to determine which schemes have been included in the CEA, how schemes have been selected for assessment within each topic, and why other schemes have been discounted.

2.7.5 The Scoping Report includes a provisional list of cumulative schemes in Table A1 and Figure A.1 of Appendix A which should be considered within the CEA for each of the technical disciplines.

2.7.6 For each cumulative scheme, Table A1 records the development details (name, application number and development description) and its distance from the site. It is recommended the developer details are added to Table A1. This information should be contained in a development schedule which is based on the best available knowledge regarding the status of each development in specified assessment years. Figure A.1 showing the location of the cumulative schemes should be provided within the ES (also showing the catchment area selected).

2.7.7 Data from relevant planning submissions should be used to inform the CEA. In the absence of publicly available data, an assumption for a reasonable worst-case scenario should be made, agreed with the LPA in advance and documented in the relevant section of the ES. For the future years' cumulative assessment, information may be limited therefore assessment assumptions should be made clear.

2.7.8 Information on the HS2 programme should be considered within the CEA. This information (some detail of this is already set out in Section 5 of the Scoping Report Addendum) can be used to establish the future baseline, assessment scenarios and the construction programme (including predicted peak construction periods and construction traffic routing) of the proposed development.

2.7.9 It is acknowledged that there needs to be a cut off for the inclusion of the cumulative schemes within the CEA. However, should other schemes come forward prior to determination of the application for the proposed development that meet the thresholds for consideration within the CEA, then these schemes will also need to be considered within the relevant technical ES assessments.

2.8 Demolition and construction phase

2.8.1 The demolition and construction phase assessments should assess the reasonable worst-case scenario, assumed to be the peak period or level of activity.

2.8.2 The ES should include details of the dredging process and associated activities (i.e., location, timings, storage, removal and/or re-use of dredged materials) as noted in Section 2 of the Scoping Report Addendum and any specific mitigation measures required.

2.8.3 As set out within Section 2.4 of this Scoping Opinion, any mitigation commitments that are taken into account within the demolition and construction phase assessments should be clearly stated in the proposed development ES chapter, or equivalent, and any relevant section relating to embedded mitigation.

2.9 Non-technical summary

2.9.1 A non-technical summary of the ES should be submitted alongside the main ES. The content should adhere to the EIA Regulations and best practice as outlined in Appendix A.

2.10 Other environmental considerations

2.10.1 The Applicant proposes that the detailed planning application will be supported by a number of standalone documents which will inform, or be informed by, the EIA. These documents will address further potential, non-significant effects as a result of the proposed development and will be important design considerations. The standalone documents include:

- Air Quality Assessment;
- Archaeological Desk Based Assessment;
- Biodiversity Net Gain (BNG) Statement;
- Circular Economy Statement;
- Energy and Sustainability Statement;
- Flood Risk Assessment (FRA);
- Groundwater Risk Assessment;
- Heritage Statement;
- Lake Management Plan;
- Lighting Strategy.
- Noise Assessment;

- Operational Management Plan;
- Outline / Draft CEMP;
- Outline Mitigation Enhancement and Management Plan (MEMP);
- Social and Community Benefits Statement;
- Surface Water Drainage Strategy;
- Transport Assessment;
- Tree Survey and Arboricultural Impact Assessment;
- Water Framework Directive Assessment; and
- Whole Life Carbon Assessment (WLCA).

2.11 Additions and variations required

2.11.1 The sections of the Scoping Report and Scoping Report Addendum that cover the non-technical elements of the ES are appropriate subject to the additions and variations set out in Appendix A.

3. EIA scoping – Topics scoped out

3.1 Introduction

3.1.1 Based on the information provided in the Scoping Report, consideration of likely effects during both the construction and operation of the proposed development, and the subsequent comments included in this Scoping Opinion, it is considered that the following topics listed in Table 2 can be **scoped out** of the EIA.

3.1.2 The justification for scoping out the topics listed in Table 2 is reported in more detail in Sections 3.2 to 3.19.

Table 2 Topics to be SCOPED OUT of the Hillingdon Water Sports Facility and Activity Centre EIA

Topic	Section of this Scoping Opinion
Socio-economics	3.2
Noise and vibration	3.3
Air quality	3.4
Climate change	3.5
Traffic and transport	3.6
Cultural heritage - archaeology	3.7
Cultural heritage – built heritage	3.8
Agriculture and soils	3.9
Light pollution	3.10
Wind, daylight, sunlight and overshadowing	3.11
Solar glare and glint	3.12
Human health	3.13
Materials and waste	3.14
Vulnerability to major accidents and disasters	3.15
Energy and sustainability	3.16
Utilities	3.17
Aviation	3.18
Electromagnetic interference	3.19

3.2 Socio-economics

3.2.1 The Scoping Report proposes to scope out the topic of socio-economics. The proposed development would provide new educational and recreational facilities available for the local community and existing uses for the sports and fishing clubs would continue to operate with these improved facilities.

3.2.2 The proposed development would not bring forward any residential development and so no potential impacts on housing delivery, social and community infrastructure are anticipated.

3.2.3 Minor beneficial impacts are expected due to the creation of employment opportunities associated with construction of the proposed development and the reopening of the community facility which has been closed since 2020. Given that the proposed development is re-providing the HOAC facility and combining the sailing and rowing club there is unlikely to be a significant uplift in socio-economics benefits but there may be some wider community benefits as the combined facility could have a wider attraction within the community.

3.2.4 A Social and Community Benefits statement should be submitted with the planning application detailing the social and health related benefits of the proposed development.

3.3 Noise and vibration

3.3.1 The Scoping Report proposes to scope out the topic of noise and vibration which is considered appropriate on the basis that:

- during the demolition and construction phase, noise and vibration would be managed through the implementation of measures set out within a detailed CEMP, which would be secured by an appropriately worded condition to any planning permission granted and updated by the appointed contractor;
- once operational, the proposed development would not result in an increase in traffic movements that would be likely to cause a perceptible increase in noise levels for nearby receptors; and
- the proposed future activities are of a similar nature and noise character to the existing uses and therefore, assuming activity levels are not anticipated to significantly intensify, the proposed development is not expected to result in a significant increase in noise levels.

3.3.2 A standalone Noise Assessment should be submitted with the planning application which should include a site suitability assessment for the worst-case future baseline scenario including any noise predictions of HS2 construction and operation activities. This should also include recommendations to inform an outline Noise Management Plan which should form part of the outline CEMP submitted with the planning application.

3.4 Air quality

3.4.1 The Scoping Report proposes to scope out the topic of air quality which is considered appropriate on the basis that:

- during the demolition and construction phase, air quality impacts, including dust, particulate matter and construction plant emissions, would be managed through the implementation of measures within a detailed CEMP, to be secured by an appropriately worded condition to any planning permission granted and updated by the appointed contractor;
- the proposed development is not located within an Air Quality Management Area (AQMA); the closest AQMA is approximately 1.2km south;
- Moorhall Road is currently used for vehicle trips. Therefore, once operational it is not expected that the number of vehicle trips and associated emissions would result in a significant adverse effect on sensitive receptors. However, this is to be confirmed once trip data is available; and

- the proposed development would not involve combustion as part of the Energy Strategy. However, this is to be confirmed once the final Energy Strategy is available.

3.4.2 A standalone Air Quality Assessment should be submitted with the planning application which should include and Air Quality Neutral and Air Quality Positive Assessment in accordance with the GLA's London Plan requirements and any required mitigation should be detailed within this assessment. This should also include recommendations to inform an air quality management plan which should form part of the outline CEMP submitted with the planning application.

3.4.3 The impact of traffic emissions, during both construction and operation, on ecologically designated sites should be considered within the Biodiversity chapter of the ES.

3.5 Climate change

3.5.1 The Scoping Report proposes to scope out the topic of climate change which is considered appropriate on the basis that:

- the proposed development would incorporate climate change adaptation and resilience measures (to be detailed within the relevant supporting document such as the drainage strategy and FRA); and

- material selection would focus on less carbon intensive materials.

3.5.2 A standalone Sustainability and Energy Strategy should be submitted with the planning application which should detail the use of renewable energy and heat and hot water generation for the site.

3.5.3 It is acknowledged that the scale and nature of the proposed development is unlikely to result in a significant increase in greenhouse gas emissions associated with on-site activities or traffic emissions. However, a WLCA should be submitted with the planning application detailing carbon emissions at the various project stages, included embodied carbon and any future potential savings and benefits.

3.5.4 The WLCA should be carried out in accordance with the 'London Plan Guidance March 2022 Whole Life-Cycle Carbon Assessments'[7].

3.6 Traffic and transport

3.6.1 The Scoping Report proposes to scope out the topic of traffic and transport which is considered appropriate on the basis that:

- the existing uses on site result in vehicle movements along Moorhall Road and once operational the increase in the proposed number of trips is not expected to be significant. However, this is to be confirmed once trip data is available;

- during demolition and construction, traffic and transport would be managed through the implementation of measures set out within the detailed CEMP, Construction Transport Management Plan (CTMP) and Construction Logistics Plan (CLP) to be secured by an appropriately worded planning conditions;

[7] GLA guidance Whole Life-Cycle Carbon Assessments guidance | London City Hall

- the existing access road would be widened to allow coaches, delivery and refuse vehicles to pass each other; and

- the proposed development would introduce formal parking arrangements and provide approximately 150 car parking and four coach parking spaces.

3.6.2 A standalone Transport Assessment should be submitted with the planning application that should include an assessment of the proposed development against the existing baseline conditions at the site and alongside cumulative developments. The Transport Assessment should clearly state how the proposed development has considered and appropriately planned the construction phasing in order to avoid adverse cumulative effects associated with the HS2 construction programme, traffic and logistics.

3.7 Cultural heritage – archaeology

3.7.1 The Scoping Report proposes to scope out the topic of archaeology. A standalone Archaeological DBA covering the peninsula area was submitted with the Scoping Report and information within the Scoping Report Addendum which concluded that:

- the archaeological potential of the site has been assessed as Moderate, with particular reference to encountering evidence of early prehistoric activity and buried alluvial and peat deposits of palaeoenvironmental significance;

- there is potential for significant disturbance to sub-surface deposits as a result of modern sand and gravel extraction in the vicinity of the site; and

- the site partly lies within the Colne Valley Archaeological Priority Zone (APZ) which incorporates the Archaeological Priority Areas (APA) of Harefield North, West Drayton, and parts of Uxbridge.

3.7.2 The Archaeological DBA does not include an assessment of the impact of the proposed dredging on potential archaeology, a geoarchaeological deposit model or cover the full extent of the proposed site boundary.

3.7.3 A further standalone Archaeological DBA should be submitted with the planning application that should include an assessment of the proposed development against the existing baseline conditions at the site and alongside cumulative developments for the full site planning boundary area. The Archaeological DBA should include a geoarchaeological deposit model and an assessment of the impacts of the planned dredging considering design, depth and location within the site. Should the Archaeological DBA for the areas not currently covered by the existing information identify the potential for significant effects, the assessment should be presented as a separate chapter within the ES.

3.7.4 Historic England has also requested the submission of an Archaeological Field Evaluation with the planning application. The scope and timing of any additional evaluation work should be agreed with Historic England. Again, should the evaluation work identify the potential for significant effects on archaeology, then a full assessment of impacts should be scoped in to the ES.

3.7.5 Appropriate mitigation in the form of a programme of archaeological monitoring and recording of geotechnical investigations to establish the depth and survival of archaeological deposits within the site, and in particular to determine the presence of any stratified peat deposits of prehistoric date, may be recommended. The details of this programme would be subject to agreement with Greater London Archaeological Advisory Service.

3.8 Cultural heritage – built heritage

3.8.1 The Scoping Report proposes to scope out the topic of built heritage which is deemed appropriate on the basis that:

- there are no designated heritage assets within the site, although the site is directly adjacent to the Widewater Lock Conservation Area and the Black Jacks and Copper Mill Lock, Harefield Conservation Area;
- no significant direct or indirect (i.e., setting) effects on heritage assets have been identified; and
- upgrade and/or restoration works are currently proposed to the 19th Century canal bridge (Bridge 179 on the Grand Union Canal) which are likely to be beneficial, although these are unlikely to be significant.

3.8.2 A standalone Heritage Statement should be submitted with the planning application which should include an assessment of the heritage effects of the proposed development. The Heritage Statement should clearly detail the proposed upgrade and/or restoration works to Bridge 179 on the Grand Union Canal.

3.9 Agriculture and soils

3.9.1 The Scoping Report proposes to scope out the topic which is deemed appropriate on the basis that:

- the site does not comprise agricultural land;
- the site has previously been subject to mineral extraction for sand and gravel deposits resulting in the majority of soil deposits being removed; and
- during the construction phase, soils on site would be handled in line with best practice measurements set out within the outline CEMP. This should include details on how soil would be removed, stored, treated (if applicable) and re-used or disposed.

3.10 Light pollution

3.10.1 The Scoping Report proposes to scope out the topic of Light Pollution which is considered appropriate on the basis that:

- during the demolition and construction phase, site lighting controls would be set out within a detailed CEMP, to be secured by an appropriately worded condition to any planning permission granted; and
- operational lighting would be limited as the proposed development would be predominantly operational during daytime hours.

3.10.2 A standalone Lighting Strategy should be submitted with the planning application which should include best practice design principles to demonstrate how lighting would be managed in order to ensure the safety of users and those traveling to/from the site whilst not adversely impacting ecological receptors or visual amenity. The Lighting Strategy must consider ILP guidance on obtrusive lighting in order to minimise light spill to the sky and existing habitats.

3.10.3 The impact of lighting disturbance should be considered within the ecological impact assessment presented in the Biodiversity chapter of the ES.

3.11 Wind, daylight, sunlight and overshadowing

3.11.1 The Scoping Report proposes to scope out the topics of wind microclimate, daylight, sunlight, overshadowing and solar glare which is considered appropriate on the basis that the height of the proposed two-storey building and pontoon structures, and the overall scale of development, are not substantial enough to alter the wind conditions on or off site. Furthermore, the proposed development would likely only result in overshadowing impacts in the immediate environs of the proposed buildings and would not impact the amenity spaces of any nearby residential properties.

3.11.2 The ecological impacts as a result of overshadowing should be considered within the ecological impact assessment presented in the Biodiversity chapter of the ES.

3.12 Solar glare and glint

3.12.1 The Scoping Report proposes to scope out the topic of solar glare and glint which is considered appropriate on the basis that the only reflective surfaces within the proposed development would be photovoltaic panels which are to be located within the wooded area and therefore partially obscured by tree canopy. The panels are also limited in number and unlikely to have a significant impact on the planes travelling to or from Denham Aerodrome.

3.13 Human health

3.13.1 The Scoping Report proposes to scope out the topic of human health which is deemed appropriate on the basis that:

- during the demolition and construction phase, measures to manage dust and noise pollution from construction traffic would be set out within a detailed CEMP, to be secured by an appropriately worded condition to any planning permission granted;
- any potential adverse effects as a result of the demolition and construction phase would be temporary; and
- providing opportunities for recreational activities is likely to have beneficial health effects, although these are not expected to be significant at a population level.

3.13.2 The planning application should be accompanied by the following standalone documents which should include measures to ensure there are no adverse effects on the health and wellbeing of future users of the site as a result of the proposed development:

- a Lake Management Plan which details the long-term management of water quality and hydrology of Broadwater Lake; and
- technical assessment reports for air quality, noise and flood risk which should be used to inform the design to ensure indirect health effects are mitigated. Recommended measures should include, but not limited to, dust suppression during construction, management of construction traffic, control of working hours to restrict noise and vibration activities and safe access and egress plan during flood events.

3.13.3 The Lake Management Plan should include details on, but not limited to, data collection, appraisal of current conditions (including currently present aquatic flora and fauna), management and monitoring strategy. The Lake Management Plan referred to in this section should be used to manage water quality and risk to lake users.

3.13.4 A Social and Community Benefits statement should be submitted with the planning application which considers the likely social and health-related benefits of the proposed development.

3.14 Materials and waste

3.14.1 The Scoping Report proposes to scope out the topics of materials and waste. The Scoping Report identifies materials in their own right, and landfill capacity as receptors and references the IEMA Guide to Materials and Waste 2020[8] for assessing the significance of effects. Information on the likely quantities or types of waste that would be generated during the construction and operation of the proposed development should be presented in the ES.

3.14.2 A brief description of the activities likely to generate waste during demolition and construction has been provided in Section 3 of the Scoping Report Addendum. Effort should be made to reduce raw material consumption, re-use as much material on-site as possible and ensure efficient use of materials. Any imported material should be minimised and where possible, dredged material from the lake and island removal should be re-used in the creation of new habitats and proposed islands. Should material need to be imported, any associated impacts should be considered within the relevant technical assessments.

3.14.3 The Scoping Report states that measures would be in place to manage waste according to the Mayor's waste hierarchy and LPA waste and recycling requirements, throughout the demolition, construction and operational phases of the proposed development, which would mitigate, as much as feasible, the disposal of waste to landfill. Waste management should be managed through the implementation of a Construction Waste Management Plan ('CWMP'), to be secured as a condition to any planning permission granted.

3.14.4 A Circular Economy Statement should be submitted with the planning application which should include robust forecasts of the waste arisings during the demolition, construction and operational phases of the proposed development, respectively. In addition, it would include details on the reduction, reuse and/or recycling of materials, storage, transfer, collection, and treatment measures, in accordance with the waste Duty of Care requirements and how waste performance would be monitored and reported.

3.15 Vulnerability to major accidents and disasters

3.15.1 The Scoping Report proposes to scope out the topic of major accidents and disasters which is considered appropriate on the basis that:

- the site is not located in areas which are anticipated to be at risk of foreseeable disasters or accidents;
- the proposed development does not comprise uses that are likely to generate new or hazardous risks;
- consideration of any likely significant effects related to flood risk and traffic accidents would be covered in the FRA and Transport Assessment, respectively; and
- there are no Control of Major Accident Hazards (COMAH) sites within a 5km radius of the proposed development.

[8] Materials and Waste in Environmental Impact Assessment, March 2020. IEMA. Available at: https://www.iema.net/resources/reading-room/2020/03/30/materials-and-waste-in-environmental-impact-assessment

3.16 Energy and sustainability

3.16.1 The Scoping Report proposes to scope out the topic of energy and sustainability which is deemed appropriate on the basis that an Energy and Sustainability Statement will be submitted as a standalone document with the planning application.

3.16.2 Key elements of the proposed energy strategy which informed assessments within the EIA should be detailed within the description of the proposed development chapter of the ES, for example the construction of a new energy centre and installation of air source heat pumps.

3.17 Utilities

3.17.1 The Scoping Report proposes to scope out the topic of utilities which is deemed appropriate on the basis that significant effects are unlikely and consultation would be undertaken with the relevant statutory bodies to confirm sufficient network capacity regarding power, water and foul drainage utilities.

3.17.2 The construction programme should be informed by consultation with utility providers to ensure that any substantial construction works are appropriately sequenced alongside HS2 construction activities.

3.18 Aviation

3.18.1 The Scoping Report proposes to scope out the topic of aviation which is considered appropriate on the basis that the proposed development does not include the construction of buildings greater than two storeys in height (maximum height of 6.2m) which is beneath the 1,000 feet (304.8m) threshold set by the Civil Aviation Authority's ('CAA') safeguarding policy.

3.18.2 No effects would be expected on the Denham Aerodrome which is located approximately 1km west of the proposed development.

3.19 Electromagnetic interference and telecommunications

3.19.1 The Scoping Report proposes to scope out the topic of electromagnetic interference and telecommunications which is deemed appropriate on the basis that:

- all new electrical plant would be designed to be in accordance with the current standards; and
- standard easements would be maintained to avoid potential impacts on underground transmissions cables; and there would be no major sources of electromagnetic fields as part of the proposed development.

3.19.2 The Scoping Report should acknowledge that radio signals are able to operate successfully in most environments and so there is considered to be no risk to radio reception (both analogue and digital) on Denham Aerodrome as a result of the proposed development.

3.19.3 The small scale of the proposed development would not result in a digital terrestrial television (DTTV) reception shadow.

4. EIA scoping – Topics scoped in

4.1 Introduction

4.1.1 Based on the information provided, it is considered that there are likely to be significant effects associated with the topics set out in Table 3. These topics should be **scoped in** to the EIA and require further technical assessment.

4.1.2 The technical assessment process and results for each of these topics should be reported in the ES.

4.1.3 The justification for scoping in these topics is contained within the Scoping Report. Relevant additions or variations required from the information contained within the Scoping Report are reported in detail for each topic in Sections 4.2 to 4.4 of this Scoping Opinion.

4.1.4 The right-hand 'checked' column enables the Applicant to check that each requirement has been met within the ES.

Table 3 Topics to be SCOPED IN to the Hillingdon Water Sports Facility and Activity Centre EIA

Topic	Section of this Scoping Opinion
Biodiversity	4.2
Water resources and flood risk	4.3
Ground conditions and contamination	4.4
Landscape and visual	4.5

4.2 Biodiversity

Biodiversity				
Sub-component	Scoping Opinion: Agree / Disagree with SR – Scope in (✓) / Scope out (✗)	Construction (C) / Operation (O)	Additions and Variations	Checked
Topic sub-components				
Designated sites	Agree with SR – Scope in (✓)	C / O	The types of designated sites included, and the search radii proposed (distances from site within which designated sites are considered) seem to be appropriate. No additions or variations required.	☐
Habitats	Agree with SR – Scope in (✓)	C / O	The types of habitats scoped in and considered by surveys appears to be appropriate. No additions or variations required, although confirmation should be sought as to whether Phase 2 (NVC) habitat surveys of Habitats of Principal Importance (deciduous woodland and wet woodland) on site have been considered and, if so, why deemed not to be necessary.	☐
Protected and notable species	Agree with SR – Scope in (✓)	C / O	The range of species scoped in for survey and assessment appears to be appropriate. Consultee response suggests considering other protected species including, for example, great crested newts, reptiles, water voles and badgers.	☐
Future Baseline	Agree with SR – Scope in (✓)	C / O	Agree with the broad approach and likely future trends identified. No other additions or variations required.	☐
Assessment sub-components				
References (legislation, policy, guidance)	The following guidance should be referred to and followed within the ES: NERC Act (S41 Priority Habitats), BNG assessment policy and guidance as a minimum. References to legislation, policy and guidance is covered more explicitly in the PEA.			☐
Study area and spatial scope	While the scope of designated sites included appears to be appropriate, there is no explicit mention of Impact Risk Zones around SSSIs and potential project interfaces with IRZs (leading to the potential for indirect effects to SSSIs). These should be included within the spatial scope of the study.			☐
Baseline (incl. sensitive receptors)	Discrepancy in description of status of bat roosts on site needs clarification and/or alignment - likely absent in Table 5.1; likely low to moderate value in 5.22 and then confirmed presence of two roosts on site in 5.23. Similarly, Table			☐

Biodiversity		
	5.1 lists dormouse and water vole as present, but 5.29 suggests that they are absent - if 5.1 is simply stating that there is the potential for the species to be present and 5.29 (in this instance) the survey outcomes for those species, this should be made clearer. Otter holts ruled out despite large areas of the banks not accessed. Confirm why no boat/kayak-based survey completed. Requirement for further waterside survey referenced in PEA. Wintering Bird results outstanding - assessment in progress (due for completion March 2023). PEA appendices note "The development would cause a net loss of deciduous woodland, and could impact breeding and wintering birds, damaging the integrity of the SSSI", so future BNG and EIA assessment must address this clearly.	
Assessment approach	Assessment of future baseline should consider the potential value of any habitats that might be retained through positive management intervention, in line with current EcIA guidance, and not just the decline in current condition of habitats on site through neglect. Note that Defra metric version 4.0 may be available by the time of the assessment. Assessment of the impact of dredging on aquatic receptors (fish, European eel) would be expected within the EIA. Effects on designated features of the SSSI, LNR and functionally linked land should be assessed.	☐
Mitigation and monitoring	The 30-year management plan should be produced in line with BNG requirements. Monitoring of species and adaptive management commitments to respond to findings (for example, any decline in wintering bird numbers for which the SSSI is designated) should be clear. The Ecological Mitigation Plan should be updated following the results of wintering bird and otter surveys.	☐
Consultation	Consultation with Natural England should be undertaken, given the site's SSSI status. Consultation should include reference to any interfaces with Impact Risk Zones around SSSIs.	☐

4.3 Water resources and flood risk

Water resources and flood risk				
Sub-component	Scoping Opinion: Agree / Disagree with SR - Scope in (✓)/ Scope out (✗)	Construction (C) / Operation (O)	Additions and Variations	Checked
Topic sub-components				
Impact on surface water hydrology	Agree SR - Scope in (✓)	C / O	The details of the proposed surface water drainage strategy should be included in the Drainage Strategy and FRA.	☐
Impact on groundwater hydrology	Agree SR - Scope in (✓)	C / O	No additions or variations required.	
Impact on surface water quality	Agree SR - Scope in (✓)	C / O	Details of proposed SuDS which would enhance water quality, and details of any parts of the site which could contaminate surface water (i.e., car parks) should be included in the Drainage Strategy	☐
Impact on groundwater quality	Agree SR - Scope in (✓)	C / O	No additions or variations required.	
Potential change in flood risk	Agree SR - Scope in (✓)	C / O	The FRA should include the impact of the alterations to the lake on the total flood storage, including details of the proposed dredging, and demonstrate how storage compensation has been provided if required. The applicant should steer lower vulnerability development to areas of lower flood risk within the site boundary.	☐
Future baseline	Agree SR – Scope in (✓)	C / O	No additions or variations required.	
Water quality impact on lake users and sensitive habitats	Disagree SR – Scope in (✓)	O	Due to the poor water quality of the lake, it is recommended that the impact on water quality is scoped into the assessment. The dredging and works to the lake as well as increased runoff from development could significantly impact the lake water quality. The Lake Management Plan should include details on, but not limited to, data collection, appraisal of current conditions (including currently present aquatic flora and fauna), management and monitoring strategy. The Lake Management Plan referred to in this section should be used to manage water quality and risk to lake users.	☐

Water resources and flood risk		
Assessment sub-components		
References (legislation, policy, guidance)	The following guidance should be referred to and followed within the ES: NPPF, The London Plan 2021, CIRIA C753, Local Plan and Strategic Flood Risk assessment.	☐
Study area and spatial scope	No additions or variations required.	
Baseline (incl. sensitive receptors)	The baseline should also include a review of the surface water drainage arrangements.	☐
Assessment approach	The significance criteria used to assess the potential effects of the development on the receptors should be clearly defined in the methodology for all the various receptors. Water quality of runoff generated by proposed development should be assessed in adherence with CIRIA C753 Simple Index approach. As noted by the EA consultation, the impact of Climate change should be fully assessed within the Water Resources chapter; this is of particular importance for the subtopics flood risk and surface water hydrology. As part of this Water Resources ES chapter, detailed information is required on the dredging of the lake; this should include but not be limited to the volume of fill, where it would be moved to, the composition of the removed material and likely contaminants present. Some relevant information is provided in Section 2 of the Scoping Report Addendum but more detail is still required.	☐
Mitigation and monitoring	Mitigation measures should be identified to reduce the impact of the proposed development on water resources and groundwater and identify the resultant significance of the impact.	☐
Consultation	A summary of consultation responses should be provided and how these have been addressed and/or responded to within the assessment. Recommended consultees are Environment Agency, Thames Water and the LLFA.	☐

4.4 Ground conditions and contamination

Ground conditions and contamination				
Sub-component	Scoping Opinion: Agree / Disagree with SR - Scope in (✓)/ Scope out (✗)	Construction (C) / Operation (O)	Additions and Variations	Checked
Topic sub-components				
Human health	Agree with SR – Scope in (✓)	C / O	Section 7.23 refers to human health receptors during operation. Considering the nature of the proposed development (including camping ground), the assessment should also consider the potential ingestion of contaminated soils.	☐
Controlled waters	Agree with SR – Scope in (✓)	C / O	The assessment should consider not only aquifer designations, but also water abstractions (SPZ1) and nearby surface watercourses (River Colne) as sensitive receptors, for the construction and operational stages. The potential for dredging activities to release contamination and for the construction of pontoons and other large structures on land to create pathways (via foundations/ piling) should be included in the assessment.	☐
Ground gas	Agree with SR – Scope in (✓)	C / O	No additions or variations required.	
Building materials	Agree with SR – Scope in (✓)	C / O	New structures are listed under 'key receptors' in section 7.25, but not within the earlier assessment scope. Contaminant impacts on all building materials in contact with the ground should be included as part of the assessment.	☐
Sensitive ecological receptors	Agree with SR – Scope in (✓)	C / O	Ecological receptors are listed under 'key receptors' in section 7.25, but not within the earlier assessment scope. Contaminant impacts on ecological receptors as a result of ground and groundwater contamination should be included as part of the assessment.	☐
Assessment sub-components				
References (legislation, policy, guidance)	The following guidance should be referred to and followed within the ES: BS10175:2011+A2:2017 Investigation of potentially contaminated sites Code of Practice.			☐
Study area and spatial scope	No additions or variations required.			

Ground conditions and contamination		
Baseline (incl. sensitive receptors)	The scoping report includes a desk study report undertaken in November 2022 by GeoIntegrity. An appropriate and comprehensive desk study report and preliminary risk assessment is required to supplement this, based on the latest development proposals. The current desk study does not make reference to the proposed new pontoon structures, camping ground, extension to the peninsula and islands, and dredging. It also mentions that an intrusive ground investigation (GI) is proposed to be undertaken. The details of this GI should be agreed in advance with the EA and Hillingdon Council contaminated land officer. The GI should aim to provide comprehensive coverage of the site, based on the latest proposed development. Surface water and soil waste classification testing should also be undertaken as part of the GI.	☐
Assessment approach	An assessment of all likely significant environmental effects referring to construction and operation stages of the proposed development is required. The ES assessment should clearly set out the likely significant effects in relation to each stage of development and each identified receptor, considering human health, controlled waters, ground gases, building materials, geological receptors and ecological receptors.	☐
Mitigation and monitoring	No additions or variations required.	
Consultation	The Environment Agency and Hillingdon Council contaminated land officer should be consulted during the preparation of the ES. The ES should include an environmental search request obtained from Hillingdon Council.	☐

4.5 Landscape and visual

Landscape and visual				
Sub-component	Scoping Opinion: Agree / Disagree with SR - Scope in (✓)/ Scope out (✗)	Construction (C) / Operation (O)	Additions and Variations	Checked
Topic sub-components				
Landscape character	Agree with SR – Scope in (✓)	C / O	The Landscape and Visual Impact Assessment (LVIA) should propose measures to reduce visual impact during construction and detail how the main building would be 'visually sensitive'.	☐
ZTV study	Agree with SR – Scope in (✓)	C / O	No additions or variations required – the additional viewpoints have been agreed upon with Hillingdon Council Urban Design Officer.	
Assessment sub-components				
References (legislation, policy, guidance)	Impacts should be assessed using visualisations produced in accordance with the Landscape Institute Technical Guidance Note 06/19.			☐
Study area and spatial scope	No additions or variations required.			
Baseline (incl. sensitive receptors)	The HS2 Colne Valley Viaduct would be the greatest change to the landscape and visual baseline and should be considered appropriately in all assessment scenarios and viewpoints.			☐
Assessment approach	Impacts upon sensitive recreational visual receptors of walking routes, cycle networks and residential receptors need to be considered within the visual assessment and effects reported as appropriate in the ES. The list of viewpoints should be reviewed in light of these sensitive visual and townscape receptors. Plans and figures submitted with the planning application, which show the outline and detailed proposals, should be referred to within the assessment.			☐
Mitigation and monitoring	Mitigation measures should be incorporated into the proposed development, where possible, to prevent, reduce or compensate for any potential adverse effects on the landscape and visual amenity, which may occur during the construction or operational phase. Mitigation measures should be informed by the LVIA. The mitigation section of the LVIA should detail primary measures embedded in the design, construction practices and potential secondary measures to avoid and reduce impacts. Details should be provided on the location and size of areas committed to as part of the over-compensation for trees lost and list the species to be planted. The proposed design and materiality should be justified, and it should be demonstrated that the local character and sensitivities have been considered.			☐
Consultation	No additions or variations required.			

Appendix A

Additions and variations required in relation to the non-technical components of the ES.

Sub-component	Additions and Variations	Checked
Planning policy and guidance	All relevant planning policy, legislation and guidance.	☐
Description of the proposed development	The description of the proposed development should clearly state any assumptions upon which the EIA is based, in relation to construction phase and operational phase assessments.	☐
	The proposed energy strategy should be clearly stated. Should boilers be introduced as part of the scheme then these should be assessed within the relevant technical chapters of the ES.	☐
Alternatives	The ES should set out the main alternatives that were considered at different points during the development of the proposal.	☐
	The ES should address whether alternative construction methodologies or programmes have been considered.	☐
	The main reasons, environmental or otherwise, for the selection of the proposal over distinct alternatives and design iterations should be easily identifiable (this should include a comparison of the potential environmental effects of the alternatives presented).	☐
	The influence of the EIA process and consultee responses on the iterative design process that led to the proposed development should be clearly stated in the ES.	☐
Assessment scenarios	If appropriate; see section 2.6 of this Scoping Opinion.	
EIA consultation	In line with IEMA ES Review Criteria, a schedule that sets out the following should be included in the ES: • Who has been consulted (and what they have been consulted on); • A summary of the main issues, pertinent to the EIA, that have been raised by consultees; • How these issues have been addressed; and • Should any issues pertinent to the EIA not have been dealt with in the ES, clear justification should be provided for this.	☐
Potential environmental sensitive receptors	The ES should make a clear distinction between environmental sensitivities and sensitive receptors in terms of what environmental sensitivity is being impacted and what receptors are being affected.	☐
EIA methodology and significance criteria	The 'sensitivity' of the baseline environment should be clearly evaluated, and each technical ES chapter should clearly state how the sensitivity of receptors has been classified and determined.	☐
	In line with IEMA ES Review Criteria, where limitations in the baseline information exist which could influence the assessment findings, these should be easily identifiable in the ES.	☐
	The methods for establishing the 'magnitude' of effects on the receiving environment must be clearly defined in each technical ES chapter.	☐
	It should be clearly stated in the ES where and how professional judgement has been applied.	☐

Sub-component	Additions and Variations	Checked
Environmental design and management measures	All primary (inherent or embedded) mitigation, and additional mitigation measures should be described in detail in an upfront section of the ES on environmental design and management measures.	☐
	Biodiversity benefits, in line with local and national policy should be embedded within the proposals and reported within the ES.	☐
	All environmental enhancements should be clearly described.	☐
	The ES should comment on the certainty of the mitigation measures proposed in terms of delivery and efficacy.	☐
	The means by which mitigation measures are to be secured and implemented during construction and use/occupation (as appropriate), and with whom the responsibilities lie for their delivery must be stated clearly.	☐
	Details of monitoring should take into consideration environmental design and mitigation measures and would be secured through planning conditions and/or section 106 agreement obligations.	☐
Glossary	A glossary and abbreviations list should accompany the ES.	☐
Non-technical summary	The non-technical summary should be prepared in accordance with the requirements of Schedule 4(9) of the EIA Regulations.	☐
	The stand-alone NTS must be written in language that is easily understandable to the general public. The style of writing should be simple, clear, concise and non-repetitive. It is essential that the NTS reflects in an accurate and balanced way, the key information contained in the ES. A good NTS makes it clear what the key messages are for the targeted audience. The NTS should not comprise text copied and pasted from the ES.	☐
	The NTS should provide sufficient information for a member of the public to understand the likely significant environmental effects of the proposed development without having to refer to the main ES.	☐
	The NTS should be consistent with the ES and should not contain information or conclusions that are not stated in the ES.	☐
	Diagrams, maps, figures and photographs are encouraged to help generate an understanding of the subject and convey the principal messages of the ES. Maps and diagrams that, at a minimum, illustrate the location of the application site(s), the boundary of the proposed development and the location of key environmental receptors, should be included.	☐
	The NTS should make clear where and when the full ES can be viewed and/or purchased.	☐

Appendix B

Full consultation responses received from statutory and non-statutory consultees.