

2382/APP/2023/2906 From COLNE Valley Trust

This response is from and on behalf of The Colne Valley Regional Park

- **The Colne Valley Regional Park has six objectives: including, particularly relevant to this application, recreation, biodiversity and landscape objectives (link below)**
- <https://www.colnevalleypark.org.uk/whats-special/>

This revised application is an improvement on that previously proposed to which we objected strongly. We recognise the unique circumstances that have led to this application and have great sympathy for HOAC's position, but we are concerned that the application as currently submitted still harms the status of the Mid Colne Valley SSSI contrary to National and Local planning policy and conflicts with the objectives of the CVRP. We are therefore disappointed that The London Borough of Hillingdon has not sufficiently take our previous concerns and that of other bodies, including statutory, into account when revising this application.

Our concerns being as follows:

- Hillingdon's position appears to be that the development is the only way of securing an improvement in the SSSI's current unfavourable status. To do this considerable monitoring and investment would be required with an agreement from Natural England. However, we are unconvinced of this argument. HS2 should take some of the responsibility for its current status.
- Indeed, HOAC themselves appear unable to realise the harm to the SSSI caused by the proposal and do not want to be restricted in terms of their operation on the lake.
- We are therefore very much of the view that to satisfy HOAC's requirements the only solution is for a different location than Broadwater Lake. This could be a combination of Troy Lake for sailing (where they currently have summer activities) and the original site for land and water-based activities. This solution should be properly explored.
- It is notable that the nearby water ski club is prohibited by condition from operating from mid- November until the beginning of March to prevent harm to the overwintering birdlife within the SSSI. See Buckinghamshire's planning permission 17/00151/FUL. The activity level on this site is also much less impactful on the SSSI than that proposed by HOAC.
- Potential improvements to the previous scheme are the demolition of the current Broadwater sailing club ensuring the restoration of the northern part of the lake and removing or downgrading the access road. If the decision is made to approve then restrictions should also be imposed to prevent sailing on the

western side of the lake and limit activities to the eastern side where the facilities are. I have compared the size (if sailing restricted to the eastern portion) with Bury Lake at the Aquadrome and at HOACs previous location and they are similar.

- Other concerns are the loss of woodland to create the activity centre and recreational buildings; intensification of activities - 7/7 instead of twice weekly for the existing sailing club; increased lighting and traffic (although limited to the southeast corner). All of these would have a negative impact on the biodiversity but it will particularly affect the bats.
- Some of the islands would be removed including one covered in Japanese knotweed so this could be a neutral effect.
- The application is mistaken in assuming the land where the development is proposed is Grey Belt - land within a SSSI and with possible flooding concerns is specifically excluded from Grey Belt definition and therefore is fundamentally unsuitable for development. This land is not Grey Belt.
- We support concerns expressed by others including HMWT, Friends of Stockers Lake and Sarah Green's comments regarding the development's potential for harm to the source protection zones for drinking water. This last point should be explored with the Environment Agency.
- The Colne Valley Regional Park is a Community Trust funded by local authorities and donations from corporate sponsors and members of the public. To mitigate the development if approved, we would wish to be involved in any S106 agreement in order that benefits accrue to the CVRP consistent with national and local planning policy.

