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By e-mail only: PlanningEConsult@Hillingdon.gov.uk

15th January 2026

Dear Michael Briginshaw

RE: 2382/APP/2023/2906 Redevelopment of the site to create the Hillingdon Watersports Facility and Activity Centre including demolition of existing Broadwater Lake Sailing Club (BSC) clubhouse at the north of the lake and erection of a building including changing facilities, meeting rooms, storage, Workshop and seasonal worker accommodation (sui generis), activity shelters; installation of pontoons and slipways; boat shed; equipment storage huts; boat parking and racking areas; camping area; outdoor activity areas; ecological enhancement throughout the site; new pedestrian routes through the peninsula; landscaping including new woodland, dense vegetation screens and boundary treatment; access road; localised dredging and land reclamation; relocation of existing sailing area and creation of floating reedbeds within the lake; coach drop off and turning area; vehicle parking; cycle parking; and associated works. (Re-consultation following submission of amended plans and documents)

Buglife - The Invertebrate Conservation Trust would like to make the following comments on the above planning application. However, it would also like to support the broader and more detailed comments submitted by the Hertfordshire and Middlesex Wildlife Trust (HMWT) in its submission dated 8th January 2026.

Buglife objects to this planning application on the following grounds:

Potential impacts on invertebrate assemblages within the broad-scale Thames Basin Heath & Woodland Important Invertebrate Area

Invertebrate surveys associated with the application suggest the site supports a good assemblage of invertebrates, including some Nationally Scarce and Notable species of conservation concern. A total of 303 species were recorded on the peninsula area, and 254 on the lake edge. Analysis of the data using the Pantheon tool¹ showed that three Specific Assemblage Types (SATs) indicated favourable habitat condition: 'rich flower resource', 'scrub edge', and 'open water on disturbed mineral sediments'.

The site has the potential to support habitats that are an important component of the broad-scale Thames Basin Heath & Woodland Important Invertebrate Area (IIA). IIAs are sites that are nationally or internationally important for the conservation of invertebrates and the habitats upon which they rely². Although the IIA has yet to undergo the fine-scale mapping that will refine the underlying site network and list of associated invertebrate species, the application site is a part of a network of connected wildlife-rich habitats that form part of this IIA network.

¹ <https://pantheon.brc.ac.uk/>

² <https://www.buglife.org.uk/our-work/important-invertebrate-areas/>

Potential impacts on Priority Habitats

The proposed development would lead to the loss of Priority Habitats listed under Section 41 of the Natural Environment & Rural Communities (NERC) Act 2006 including wet woodland and open water. These habitats are likely to be important to the invertebrate assemblages identified through surveys, including species of conservation concern.

In addition to direct losses, there are likely to be indirect impacts that reduce the quality of the habitats on-site for invertebrates. Of particular concern is the increase in water sports activity in the open water areas of the application site, which is expected to increase wave action. Increased wave action can lead to the loss of shoreline macrophytes and could have meaningful impacts on the invertebrates of the lake edge³. Species such as the ground beetle *Elaphrus riparius*, and the reed beetles *Donacia simplex* and the Nationally Scarce *D. thalassina* are associated with emergent vegetation at lake edges and would be subject to increased disturbance from such wave action increases.

The peninsula habitats will also likely be subject to indirect impacts as a result of increased activity, such as habitat disturbance from an increase in visitor footfall at what is already a popular and highly valued green space for the local community. The proposals are also likely to increase the impacts from Artificial Lighting at Night (ALAN) near to these sensitive habitats. ALAN has numerous direct and indirect impacts on invertebrates, including exhaustion, increased predation, and a disrupted ability to navigate⁴. Evidence shows that an increase in ALAN above 0.5 lux can impact the natural behaviour of living things, it is therefore important that all measures are taken to reduce the impact of light pollution.

Loss of habitat and impact on the Mid Colne Valley Site of Special Scientific Interest and Broadwater Lake Metropolitan Site of Importance for Nature Conservation

The proposals would lead to the direct loss of habitats in the Mid Colne Valley Site of Special Scientific Interest (SSSI). While invertebrates are not a notified feature of the SSSI citation⁵, SSSIs are the backbone of conservation in the UK and should be safeguarded from development. While the revised application documents have sought to reduce impacts on SSSI features, Buglife considers a SSSI as the wrong location for the proposed development.

Broadwater Lake is also identified as a Metropolitan Site of Importance for Nature Conservation, part of a network of sites and green spaces which meet selection criteria and will form a core part of ambitions to deliver Local Nature Recovery Strategies and national ambitions to meet 30 by 30 commitments⁶.

Policy background

With regards to SSSIs, the National Planning Policy Framework (NPPF) states that:

193. When determining planning applications, local planning authorities should apply the following principles:

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

³ <https://royalsocietypublishing.org/rspb/article/288/1959/20211623/86373/Ecological-impacts-of-water-based-recreational>

⁴ https://cdn.buglife.org.uk/2019/08/A-Review-of-the-Impact-of-Artificial-Light-on-Invertebrates-docx_0.pdf

⁵ <https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1003469.pdf>

⁶ <https://www.gov.uk/government/publications/criteria-for-30by30-on-land-in-england/30by30-on-land-in-england-confirmed-criteria-and-next-steps>

b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

This application will demonstrably impact on a SSSI and does not demonstrate that this application should be considered as an exception to the NPPF's principles.

The application also fails to meet the requirements of the Hillingdon Local Plan's Strategic Policies⁷. 'Policy EM7: Biodiversity and Geological Conservation and Policy' clearly states that "*Hillingdon's biodiversity and geological conservation will be preserved and enhanced with particular attention given to: 1. The conservation and enhancement of the natural state of.... Colne Valley Regional Park*". It also states that, "*The protection and enhancement of all Sites of Importance for Nature Conservation. Sites with Metropolitan and Borough Grade 1 importance will be protected from any adverse impacts and loss.*"

Summary

The proposed development would lead to the loss of priority habitat supporting a valuable invertebrate assemblage within the broad-scale Thames Basin Heath and Woodland IIA, with loss of habitats and direct impacts to a SSSI and Metropolitan Site of Importance for Nature Conservation. The proposals would negatively impact biodiversity and fail to meet the requirements of both local and national planning policy.

Please do not hesitate to contact us if further information is needed on any of the points raised and Buglife requests to be kept informed of this application.

Yours sincerely



Jamie Robins

Programmes Manager

⁷ https://www.hillingdon.gov.uk/media/3080/Local-Plan-Part-1---Strategic-Policies/pdf/npLocal_Plan_Part_1_Strategic_Policies_15_feb_2013_a_1_1.pdf?m=1598370401647