



Hertfordshire & Middlesex Bat Group

FAO Michael Briginshaw
Deputy Team Leader
Hillingdon Council
North Area Planning Team
Planning, Regeneration and Environment Central Services
email: PlanningEConsult@Hillingdon.gov.uk

12th July 2024

Dear Mr Briginshaw

The Herts and Middlesex Bat Group understand that no decision has been made on the planning application below and would like to object to the proposal.

Planning Reference 2382/APP/2023/2906
Broadwater Lake, Moorhall Road, Harefield

Proposal: Redevelopment of the site to create the Hillingdon Watersports Facility and Activity Centre.

The Hertfordshire and Middlesex Bat Group objects to the proposed development for the reasons given below.

Broadwater Lake is a Site of Importance for Nature Conservation (SINC site) and also a Site of Special Scientific Interest (SSSI) of national importance. As a designated SSSI it receives statutory protection. The Bat Group considers that the proposed development would cause: significant harm to biodiversity in general, have an adverse impact on the bat species using the site as well as resulting in the deterioration of the key features for which the SSSI has been designated for.

The proposed development is contrary to both National Policy, the London Plan and the Hillingdon Local Plan. If the redevelopment is approved, Hillingdon Council would be failing in its statutory duty to conserve and enhance biodiversity. The Environment Act 2021 strengthens the biodiversity duty that applies to public authorities in England through the duties they have to conserve and enhance biodiversity.

The proposal will require: dredging, the removal of trees, removal of roosts (Canal bridge and trees) and an intensification of water recreational activities. Currently there is low intensity recreational use by the Broadwater Sailing Club.

The habitats within the site include: broadleaved woodland, wet woodland, scattered trees, scrub, grassland and the extensive lake.

There are significant populations of bats using the lake and adjacent bordering trees with a high diversity of bat species recorded (at least 10 species, including 4 rare species).

Bat species recorded within the Broadwater Lake site include: Soprano Pipistrelle *Pipistrellus pygmaeus*, Common Pipistrelle *Pipistrellus pipistrellus*, Nathusius Pipistrelle *Pipistrellus nathusii*, Daubenton's *Myotis daubentonii*, Natterer's *Myotis nattereri*, Noctule *Nyctalus noctula*, Leisler's *Nyctalus leisleri*, Serotine *Eptesicus serotinus*, Brown long-eared *Plecotus auritus* and Barbastelle bats *Barbastella barbastellus*.

Rare species of bat present include: Nathusius pipistrelle (a species subject to extensive survey works through the Colne Valley), Leisler's, Serotine and Barbastelle. The Barbastelle is an Annex II and Annex IV species on the Habitats Directive.

Greengage Environmental Ltd during 2023 recorded roosting sites for Soprano Pipistrelle including canal bridge (to be removed) and nearby tree and also recorded a night roost for Nathusius Pipistrelle within the scrub on an island also proposed to be removed. Previously the HS2 surveys for the area at Broadwater Lake also recorded roosts for Daubenton's and Natterer's bats within the Broadwater Lake site.

The high level of bat activity (with also a high diversity of species) is due to the diversity and abundance of invertebrates available over Broadwater Lake and bordering trees.

Dredging activity, removal of islands and intensification of recreational water activities will reduce the water quality (due to mobilisation of the lake bed and littoral material) and result in a reduction in numbers and diversity of insect prey potentially having a significant adverse impact on the local bat populations.

New lighting is also proposed for the site that potentially could be particularly harmful to the light sensitive species that commute across and forage within the site. Species of bat using the site that require dark habitats include: Brown Long-eared, Daubenton's, Natterer's and Barbastelle. Unsympathetic lighting has the potential to disrupt bat flight paths and prevent normal feeding activity. The Greengage 2023 Ecology Report has taken the impact of lighting into account and states that the lighting will follow the guidance Note 08/23 BCT ILP produced by the Bat Conservation Trust (BCT) and the Institute of Lighting Professionals (ILP) but it is considered that more detail is required regarding the lighting design.

The legislation protecting bats (The Conservation of Habitats and Species Regulations 2017 as amended by the EU exit Regulations 2019) and the Wildlife and Countryside Act (1981) means it is an offence (without a licence) to cause any significant disturbance to bats that could affect their ability to survive or affect their local distribution or abundance.

The Herts and Middlesex Bat Group considers that the proposals pose an unacceptable risk to the bat populations currently present in the local area and objects to the application.

Yours sincerely

Dr Jenny Jones MCIEEM on behalf of the Herts and Middlesex Bat Group