

14 January 2024

To Ian Thynne Hillingdon Council Planning Department and Council Climate Action Plan officer.

Please accept this objection to London Borough of Hillingdon Proposed Hillingdon Water Sports Facility and Activity Centre, development, at Broadwater Lake, Harefield. The proposed development will have an adverse effect on a species of principle importance for conservation, *anguilla anguilla*. Broadwater Lake is the home of *Anguilla Anguilla* European eel which is a priority species under s41 of the Natural Environment and Rural Communities Act 2006, listed as critically endangered on the global IUCN Red List of threatened species, and protected in England under specific legislation (The Eels (England and Wales) Regulations 2009).

European eels are found in Broadwater Lake and this is evidenced publically on the Gerrards Cross and Uxbridge District Angling Society website (visited 10/01/2024) on a drop down menu of their fisheries, Broadwater Lake states:

'A well-established Lake of 200 acres. Eels to 8-0-0, a must for the specialist angler.'

Broadwater Lake is the only Gerrards Cross and Uxbridge Angling Society fishery where European eels are specifically mentioned.

It is a known fact that eels are indigenous to the Mid Colne Valley. The Colne Valley Reginal Park website page Denham Eel Pass Project (6th September 2022) says that eels can spend 20 years living in the Colne Valley and Colne Valley Park is ideal habitat for eels:

'Bountiful wetland habitat with abundant sources of food (freshwater invertebrates and fish). Eels will make use of the rivers in the Colne Valley Regional Park and all the waterbodies connected to them (canals, gravel pit wetlands, ditches, ponds). Plus eels have been migrating to the Colne for thousands of years and it is this inherent instinct that directs them here.'

Evidence shows that Broadwater Lake is an important habitat for European eels but this evidence is not shown to the Council by Greengage. Greengage produced the Preliminary Ecological Appraisal, on Page 41 it says;

'Anecdotal evidence from local anglers reported carp close to 20kg in the lake, and presence of common bream (*Abramis brama*) and European eel (*Anguilla anguilla*). However none were caught in the surveys, indicating that if they were present then they would have been in low abundances.'

The Council must question the validity of the Greengage study as just because they didn't catch any eels cannot not counteract reliable local evidence.

Broadwater Lake is shallow in places with sand banks only 1 metre below the surface at the southern end. This is good habitat for eels and bad conditions for sailing. It is this area which is specifically targeted for dredging for the new development and this would seriously disrupt the eel habitat and risks releasing pollution. It would not be easy for the eels to simply move to another suitable habitat as many areas of the Colne Valley are being impacted by developments, at the same time there is a rising trend in water pollution across ground and surface water bodies. The eels need protecting in their current habitat within the SSSI. Broadwater Lake is ideal for this Critically Endangered Red list species.

London Borough of Hillingdon would be contravening your Biodiversity Duty under the Natural Environment and Rural Communities Act (2006) if you accept this planning development.

The current proposal does not protect this site of biodiversity value in opposition to National Planning Policy Framework 174a (NPPF).

The site is in the inner source protection zone for Northmoor PWS which is situated on the edge of the River Colne adjacent to Broadwater Lake. Dredging any waters of the lake would need

assessment and approval from the Water Undertaker, Affinity Water Ltd. It is not clear that this consultation has taken place.

Lastly, the Hillingdon Outdoor Activity Centre could be rebuilt at Pit 3 (the HOAC Lake). This option should be revisited as this is not fully examined in the options provided. Most of the future planned activities could be redeveloped at HOAC with possible additional sailing at the north end of Broadwater Lake under the existing sailing club area. In particular the loss of biodiversity at the original HOAC Lake needs to be addressed before further biodiversity loss is impacted on Broadwater Lake SSSI. HS2 created a wetland mitigation site to the south east of HOAC Lake and a grassland mitigation area to the east. These were created in 2018/19 before many habitats were destroyed in order to provide a wildlife refuge for species. Can the Council get a report on the success or failure of these mitigation sites? The new Watersports Activity Centre if created at the old HOAC site could take an active role in rewilding this important area in the Mid Colne Valley SMI wetland nature reserve.

This objection is submitted by Sarah Green on behalf of Hillingdon Friends of the Earth: Trees, Land use and food subgroup.