



Mr. Sadiq Khan Mayor of London City Hall Kamal Chunchie Way Fivefields 8-10 Grosvenor Gardens Victoria, London, SW1W 0DH

dmooney@wildlondon.org.uk wildlondon.org.uk Grebe House St Michael's Street St Albans, AL3 4SN

Lesley.Davies@hmwt.org hertswildlifetrust.org.uk

14 December 2023

London E16 1ZE

Dear Mayor Khan,

Under threat - Broadwater Lake, Metropolitan Site of Interest for Nature Conservation

We write to raise serious concerns about Broadwater Lake and its environs in the London Borough of Hillingdon and we would ask you to consider this threat and its implications for London as a city leading the way internationally on nature's recovery.

This is a very important place for nature in London, long designated as a Metropolitan Site of Interest for Nature Conservation (SINC). It is threatened by a major development proposed by Hillingdon Council to construct a water sports and activity centre within it.

The Wildlife Trusts believe this would not meet your vision for and commitment to nature's recovery in London, being contrary to the biodiversity objectives in the London Plan. It lies within an area of potential rewilding (Zone 10) in the London Rewilding Taskforce report. Broadwater Lake is not only very important for nature, but plays an important role in addressing climate change. It is reassuring to see recognition of the connection between nature's recovery and climate in the Urban Nature Accelerator strand of the C40 Cities work.

Broadwater Lake is important in London and beyond, recognised by the SINC status and its designation as a Site of Special Scientific Interest (SSSI), and close to a Ramsar site and Special Protection Area which supports similar species. If permitted, this development would set a damaging precedent for other sites protected for nature. The Council's proposal would greatly intensify the use of the Lake and we are very concerned about the impact of disturbance of activities on land and water, particularly on the breeding, wintering and in-moult birds for which Broadwater Lake is so important.

Hillingdon Council wants to build a water sports activity centre for the Hillingdon Outdoor Activity Centre, displaced by the construction of HS2. The two local Wildlife Trusts have played an active role in developing the HS2 Colne Valley Additional Mitigation Plan, and while we are



sympathetic to HOAC and the position they have been put in by HS2, the high ecological value of Broadwater Lake makes it categorically the wrong place for the Council's plans. In 2015, HS2 advised the House of Commons Select Committee on alternative sites for HOAC and firmly ruled out Broadwater Lake due to its importance for wildlife. This was accepted by Hillingdon Council, HOAC and the Select Committee. In a decision yet to be explained, Hillingdon Council has disregarded this Committee agreement to rule out Broadwater Lake for this development.

Herts and Middlesex Wildlife Trust, which manages land within the SINC and SSSI, has repeatedly raised concerns about this proposed development with Hillingdon Council, nevertheless, they have submitted the planning application which is now out for public consultation until 21st December. The Planning application reference is 2382/APP/2023/2906.

Our concerns are set out on Herts and Middlesex Wildlife Trust's webpage here through which we are asking people who support nature's recovery to object to the planning application: https://www.hertswildlifetrust.org.uk/threat-broadwater-lake-sssi.

We are writing together as Herts and Middlesex Wildlife Trust works at the site, and within the Colne Valley and London Wildlife Trust works elsewhere in Hillingdon and across the capital. Collectively the Wildlife Trusts are very concerned about this proposed development because of the significance of the site both in London and nationally, and permitting development within it could set a damaging precedent for other protected sites.

We ask for your urgent consideration of the concerns we have raised.

Yours sincerely,

Lesley Davies
Chief Executive

Herts and Middlesex Wildlife Trust

David Mooney
Chief Executive

London Wildlife Trust