

## Comment on a planning application

### Application Details

**Application:** 18/2977/FUL

**Address:** Marble Hill HouseMarble Hill ParkRichmond RoadTwickenhamTW1 2NL

**Proposal:** 1. Marble Hill House: External decoration and repair work (if a window is substantially rotten, partial or full replacement of joinery) and replacement rooflight. 2. Stable Block: External alterations, installation of mechanical plant, timber plant enclosure to the rear and front landscaping (creating an outdoor seating area) to facilitate the refurbishment of the existing café.3. Service Yard: new pedestrian access and associated refuse storage facilities.4. Landscaping: new soft and hard landscaping including restoration of gardens, upgrade of sports pitches and facilities, replacement of seating and new play areas.5. Sports Centre: External ramp for improved access.

### Comments Made By

**Name:** Richmond Bat Species Action Plan steering group Mr Philip Briggs

**Address:** 45 Deanhill Court Upper Richmond Road West East Sheen London SW14 7DL

### Comments

**Type of comment:** Make a general observation

**Comment:** We strongly support the recommendations in the bat survey report for precautionary approaches to the work and enhancements such as reducing lighting.

We also strongly support the ecologists' suggestion that the ice house should be enhanced for roosting bats as its potential as a hibernaculum has long been recognised by London Bat Group and this would be a major contribution to one of the actions in the Richmond Bat Species Action Plan.

The bat surveys were thorough but the ecologists acknowledge that Myotis/Plecotus species (e.g. Daubenton's bat, Natterer's bat, brown long-eared bat) are under-recorded using the acoustic survey methods used. We would like to see further assessment of these species' presence and how they are using the areas where works are planned, particularly the four woodland quadrants (their close proximity to the house could enhance the house itself as a roost for these species, brown long-eared bat in particular favouring building roosts close to tree cover). Trapping surveys would be the only sure way of properly assessing these species' presence on site.

Tree and building roosts for brown long-eared bat are known in the area so features that are used by this species should be retained.