

## West London River Group

44 Leyborne Park, TW9 3HA

24th July 2019.

Ref 18/0547/FUL for the development to the East of Ship Lane.

Proposal: APPLICATION A (Development Area 1)

Hybrid reapplication.

The West London River Group's (WLRG) members are riparian amenity societies and other community groups whose areas of interest are in or near the River Thames between Kew and Chelsea.

The WLRG have a number of concerns and objections about the impact of the development on the River and its ecology and the TowPath, which is part of the Thames Path. These concerns and objections have, through the TowPath Group, been represented at various times to the developers and are expressed in more detail in our original objection sent by email in May 2018. These concerns do not appear to have been addressed.

With specific reference: Application A including

- d. Provision of public open space, amenity and play space and landscaping, and**
- e. Flood defence and towpath works.**

The plans continue to embrace the Towpath as part of the development. It is not. It should be made clear that although access will be needed to the site from the Towpath it is not part of the development. Not everyone is familiar with the complex responsibilities/ownership of the Towpath and it is important that this be made clear on any maps.

The nature of the Towpath at this stretch of the River is not clearly understood and this misunderstanding has led to suggestions of inappropriate landscaping. The benches for example are situated at an angle at Brewery Wharf where there are river views upstream and downstream. The benches, in the main along this stretch of the River have been provided through funds raised by the West London River Group. This is a narrow stretch of the Towpath and play areas should be kept within the confines of the development. Likewise the 'grand steps' and Riverside Terrace would overhang and encroach over a narrow section of the wooded Towpath.

The WLRG also has concerns about 'riparian planting'. What constitutes riverside planting has been a subject of 20 years collaboration between the London Borough of Richmond, the PLA, The Towpath Group and the many riparian societies that make up our membership. Tree species are carefully considered and any planting should take account of the tree survey already being undertaken by the LBRuT. It does not include shrubs.

### **Northern Boundary Walls, Eastern Boundary Wall and Southern Boundary Wall.**

The demolition of the historic brick boundary walls are of significant concern as they make up the boundary of the landward TowPath/Thames Path. What is the status of the land where the new flood defence wall is set further into the Stag Brewery component of the site? The plans do not make this clear. We are assuming this will now become part of the Towpath. We would ask that this be confirmed and if so **it would be anticipated that appropriate tree planting would take place along the new boundary as part of mitigation measures.**

### **Daylight Sunlight, Overshadowing and Light Pollution. EIA Report PL01**

The WLRG is concerned that the height and proximity of the buildings within the development in relation to the river and certain areas of the towpath will have an overshadowing impact on the environment and its habitat. The land slopes down to the river and as such the impact of the buildings height is magnified. This raises concerns about the definition of "Ground Level". We maintain that Ground Level should be the height of the existing Towpath.

Irrespective of the amendments in the Hybrid application, there is still the problem of light pollution and overshadowing. EIA Report Pt.0 considers the area in which the development is to take place as falling under Zone E3 - Small town centres or urban location. However the present setting and surroundings do not fall easily into this category and consideration should be given to Zone 2 being a more appropriate category. This is a very rural and dark section of the river and Sky Glow and Light Trespass and Building Luminance will have an impact not only on bats but neighbouring houses. It is noted that a detailed plan is not yet available.

#### **Ecology EIA Report**

The Report identifies at least five species of bats which frequent in various ways this area of the River and it should be noted that some of these species are light sensitive. In addition the area is also used by a variety of other birds which are not mentioned in the Report. The bats are assessed as of local value and as such consideration should be given to ensuring a supportive environment in addition to bat boxes.

#### **Environmental Statement Vol.1 Main Text.**

##### **4.4.1. River Thames Transportation**

The alternative of transportation by barge on the river still needs to be re-considered. The current proposals to transport demolition waste and excavated soil from, and construction materials to, the site by truck on the Lower Richmond Road will have a negative impact on the environment, local residents and add significantly to air pollution, increase traffic idling time and add to an already heavily congested area.

Avril Dalglish  
Chair  
West London River Group

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