

Comment on a planning application

Application Details

Application: 22/0900/OUT

Address: The Stag Brewery Lower Richmond Road Mortlake London SW14 7ET

Proposal: Hybrid application to include: 1. Demolition of existing buildings (except the Maltings and the façade of the Bottling Plant and former Hotel), walls, associated structures, site clearance and groundworks, to allow for the comprehensive phased redevelopment of the site: 2. Detailed application for the works to the east side of Ship Lane which comprise: a. Alterations and extensions to existing buildings and erection of buildings varying in height from 3 to 9 storeys plus a basement of one to two storeys below ground to allow for residential apartments; flexible use floorspace for retail, financial and professional services, café/restaurant and drinking establishment uses, offices, non-residential institutions and community use and boathouse; Hotel / public house with accommodation; Cinema and Offices. b. New pedestrian, vehicle and cycle accesses and internal routes, and associated highway works. c. Provision of on-site cycle, vehicle and servicing parking at surface and basement level. d. Provision of public open space, amenity and play space and landscaping. e. Flood defence and towpath works. f. Installation of plant and energy equipment. 3. Outline application, with all matters reserved for works to the west of Ship Lane which comprise: a. The erection of a single storey basement and buildings varying in height from 3 to 8 storeys. b. Residential development. c. Provision of on-site cycle, vehicle and servicing parking. d. Provision of public open space, amenity and play space and landscaping. e. New pedestrian, vehicle and cycle accesses and internal routes, and associated highways works.

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: Object to the proposal

Comment: This is part 2 (part 1 contains results from our own bat survey)

It's good to see that the ecologist has done a new preliminary ecological appraisal including an inspection of the boundary walls and activity surveys, and that the report states that there is a requirement for further assessment on impacts of bat roosts and foraging and commuting habitat. It's interesting that the activity surveys recorded five species including further records of the often elusive brown long-eared bat which was also recorded on previous surveys in relation to this development.

However, in the discussions and recommendations there are three consecutive statements which we consider to be flawed:

"The survey results indicate that the habitats at the Site and adjacent to the River Thames (to the northern boundary of the Site) are used by urban bat species typically associated to be non-light sensitive."

All bat species are light-sensitive to some degree and most are highly light-sensitive. Pipistrelles are thought to be the more light-tolerant species, but lighting near roosts will inhibit emergence and result in roost loss, while studies have shown that pipistrelle activity drops above a certain level of urbanisation. Noctule is sometimes cited as a non-light-sensitive species but a European study showed that they avoid streetlights.

"It is noted that species including long-eared, noctule and myotis species were also recorded however these were in very low numbers (under 10 passes as a result of the automated detector results)."

This assessment of activity is flawed for long-eared bats as their calls are very difficult to pick up on bat detectors. The recordings obtained could significantly under-represent the activity levels. We feel that the presence of long-eared bats is a particularly important finding in the borough context. There is an important breeding population nearby in Richmond Park and a report based on a trapping study in 2011 concluded: "The Park has become isolated over many decades and if these species were to become locally extinct then this would likely be permanent and re-colonisation would be unlikely with the fragmentation of habitat and isolation of the park." Therefore, it is vitally important that we don't underestimate the value of existing dark corridors for this species within the borough.

"The results of the bat activity and automated survey indicates that bat activity is low at the Site and adjacent to River Thames."

This is likely to be linked to the time of year at which the surveys were carried out (early October). Our mid-May static bat detector surveys recorded considerably higher levels of activity. For comparison, our single detector installed on the towpath recorded nearly 4,000 bat passes across the last five nights compared with a total of 1,441 passes recorded by three detectors across five nights by the ecologists. We used quite a conservative approach, aiming to avoid including quieter call sequences likely to be from bats away from the towpath.

The ecologist carried out further external roost inspections, stating that "at the time of survey, no internal PRA was possible at the buildings / structures due to the presence of Asbestos Containing Materials (ACMs). However, this is not assessed to be a significant constraint given the historical knowledge of the Site on bats from the extensive survey work undertaken in 2016 / 2017 and 2019." Avoiding entering the structures for health and safety reasons is fair enough but from the above statement it doesn't follow that bats haven't moved in since the last surveys. Also we previously questioned whether there had been any internal inspection of buildings where loft voids are present, as it wasn't clear that this had been the case.

We previously commented that tree roosts were found in 2017-2018 and there are nearby large roost sites not acknowledged in the previous surveys which still seem to be being overlooked.

Our comments continue in part 3...