

## 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 3 of our comments.

The ecologist rightly points out the importance of the Thames as an important wildlife corridor that is likely to provide an important foraging and commuting resource, as borne out by our monitoring data. But this development proposes to change this landscape in a dramatic way, a massive high-rise riverside development which would have night-time light spill from the many windows. We're not sure we would agree with the ecologist's statement "this riparian feature will not be directly impacted by the proposed Development", though he does go on to say that "a sensitive lighting strategy should be designed...to reduce light spill onto the River" and "the corridor adjacent to the River Thames should look to be enhanced for foraging and commuting bats by the provision of soft landscaping as part of the proposed Development." However, this mitigation wouldn't be needed with a planning design that has a scale and design more sensitive to the surrounding environment.

In the section on the Richmond Biodiversity Action Plan, why is the Bat Species Action Plan not listed as one of those considered relevant to the Site? Presumably an oversight considering that bats were one of the focal species groups of the EIA? Relevant actions within the Bat SAP include:

- Encourage planning applications to preserve/enhance wildlife corridors within their scheme
- Require mitigation for increased urban surfaces in any development: green roof, green wall etc. to offset increased urbanisation (these first two actions are common to all the Richmond SAPs)
- Maximise the roosting opportunities for prospecting bats by encouraging land managers and property owners to follow good practice guidelines
- Identify potential sites for roost and hibernaculum creation opportunities

- Request the reduction in night-time lighting through the following measures (a couple of examples are given here):
- There should be no NEW lighting near ecologically sensitive areas, ponds, lakes, rivers, and areas of high conservation value.
- Trees and vegetation should be retained as they act as light shields

On to the Development Plan itself there is some reference to biodiversity but it still feels like this is being squeezed in as an afterthought rather than properly integrated into the design.

The photographic impression of the "green link" still very much looks like it is designed purely for people. The text only mentions public/commercial amenities of green open space, nothing for biodiversity. The Biodiversity Strategy itself is only one page long and extends to green and brown roofs and bird and bat boxes to be installed. The plan shows some next to the towpath and some hibernaculum boxes deeper inside the development. It would be good to know the thinking behind the latter decision and what the likelihood of usage is. Will bat boxes be used if there is too little habitat for bats and too much lighting?

The Lighting Masterplan rightly addresses the need to protect surrounded ecology (section 3.6, p.24) but the preceding pages show trees lit up like Christmas trees. Not very encouraging imagery.

Previously we commented: "The plan is for wall-to-wall high-rise flats with massive amounts of hard paving and lighting. There will be precious little environment for anything except humans if this goes ahead in its present form." Sadly, we can't see much in the new version of the plans to make us revise our views on this proposal. While the courtyard garden and community park are likely to provide pleasant areas of green space for people, there is likely to be minimal connectivity between them for wildlife due to the presence in between of the considerably larger hard surface sports pitch with flood lighting at night.