

**Heatham House Replacement Floodlights:  
Consultation 15/1245/FUL  
Response from FORCE**

This response is submitted on behalf of the Friends of the River Crane Environment (“FORCE”). FORCE is an environmental and community charity, which was established in 2003 and now has over 500 members, many of whom are residents of the London Borough of Richmond upon Thames (“LBRUT”). FORCE has an interest in all activities and works throughout the lower Crane valley. This includes the development on the site of the former Post Office Sorting Office, opposite Heatham House.

FORCE has a constructive relationship with the developer Berkeley St James, and takes this opportunity to acknowledge the investment of St James in that relationship, and the consideration which St James has shown towards the impacts of its development on the environment of the River Crane corridor adjacent to its development.

The main concern with flood lighting in this part of the River Crane corridor from our perspective is the impact upon wildlife – and particularly bats. The River Crane is well used by bats – and recent work by FORCE has identified that eight species have been recorded in the lower Crane and six/seven species are believed to be roosting near to the site, including the particularly light sensitive Daubenton’s bat.

FORCE notes that the design brief states that a major criterion for selection of the preferred lighting solution will be the avoidance of “light nuisance into nearby residential windows” and “no direct view up into the lanterns.” FORCE believes that major criteria should also be the avoidance of light spillage into the corridor of the River Crane, particularly to enhance the value of the corridor for bats, and the minimisation of overall light pollution. The corridor is used by a range of wildlife, including a number of bat species, and this project provided a great opportunity to reduce the impact of floodlighting in this area and thereby enhance its value as a night time wildlife corridor.

FORCE welcomes the statement by St James that the selection will be based on the quality of the solution in this respect, and not upon the least cost.

FORCE supports the selection of the “Troika” floodlights, the use of 4.5-metre columns and the reconfiguration of lighting across the facilities, and recognises that this is more expensive than the proposal of the alternative supplier.

FORCE’s support remains subject to the provision that the option with the least light distribution will be selected, and that St James will take steps to ensure that the lighting is correctly installed and maintained.

FORCE would be happy to discuss these issues further with LBRUT as required.