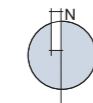
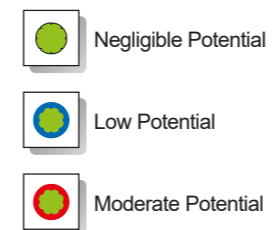
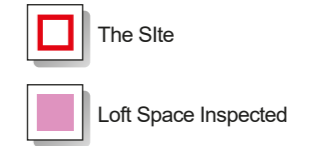
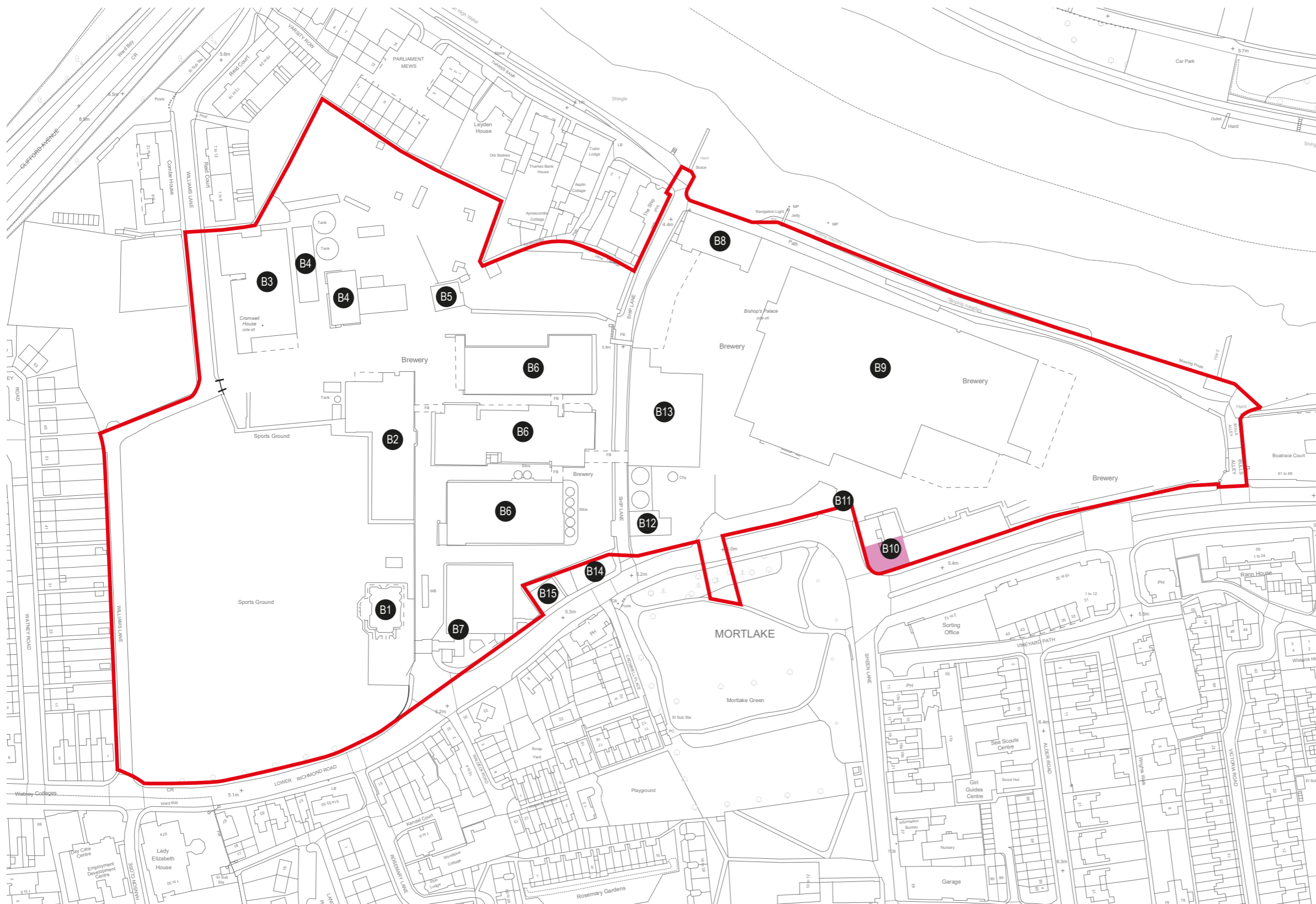


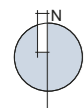
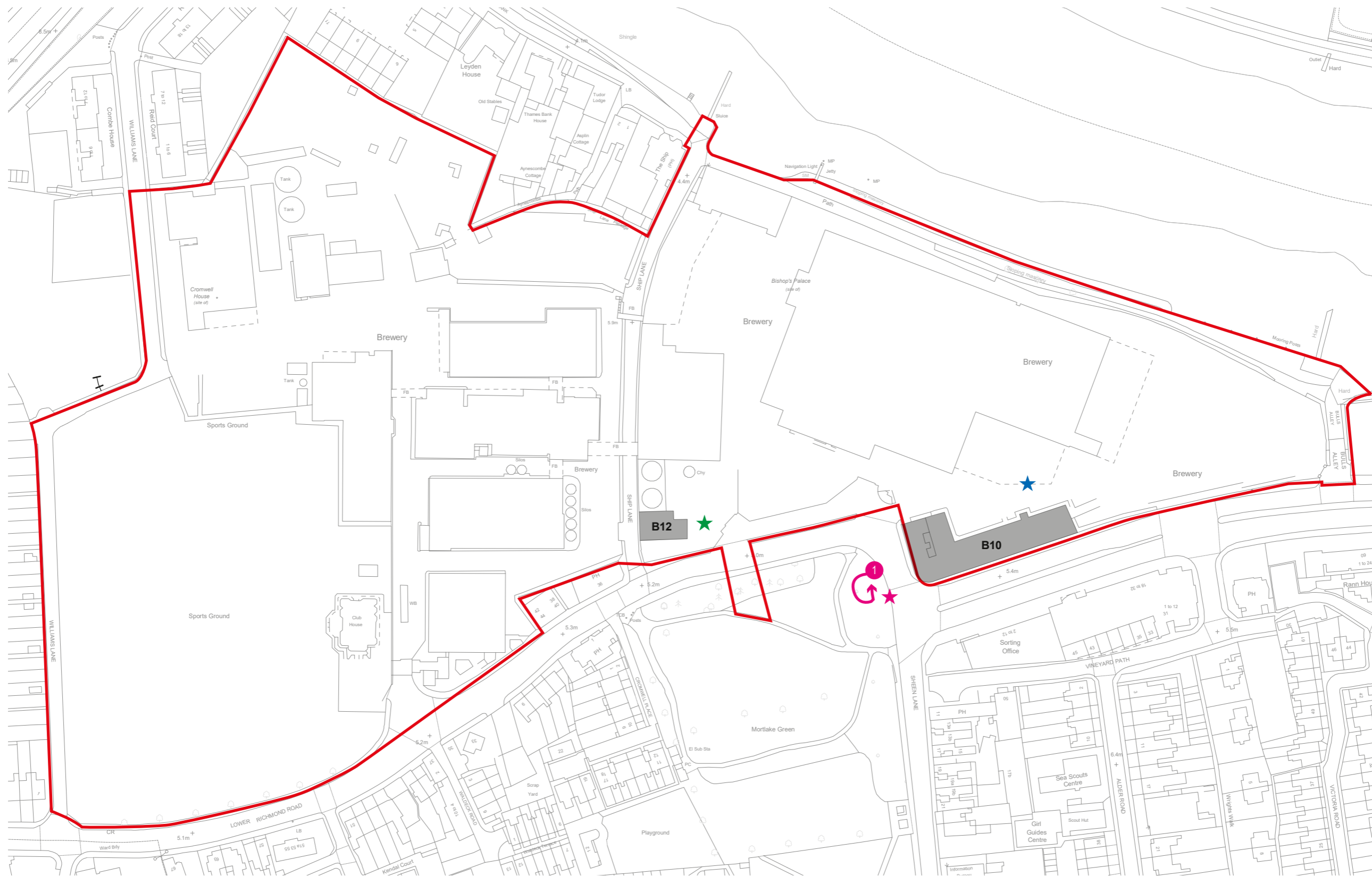
Bat Roost Potential within Trees



Project Details	WIE10667-100: Stag Brewery
Figure Title	Figure 1: Habitat Features Plan
Figure Ref	WIE10667-100_GR_EC_1E
Date	2018
File Location	\\s-inc\wiel\projects\wie10667\100\graphics\ec\issued figures

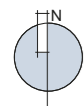


Project Details	WIE10667-100: Stag Brewery
Figure Title	Figure 2: Internal Building Inspection
Figure Ref	WIE10667-100_GR_EC_2E
Date	2018
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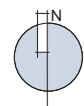
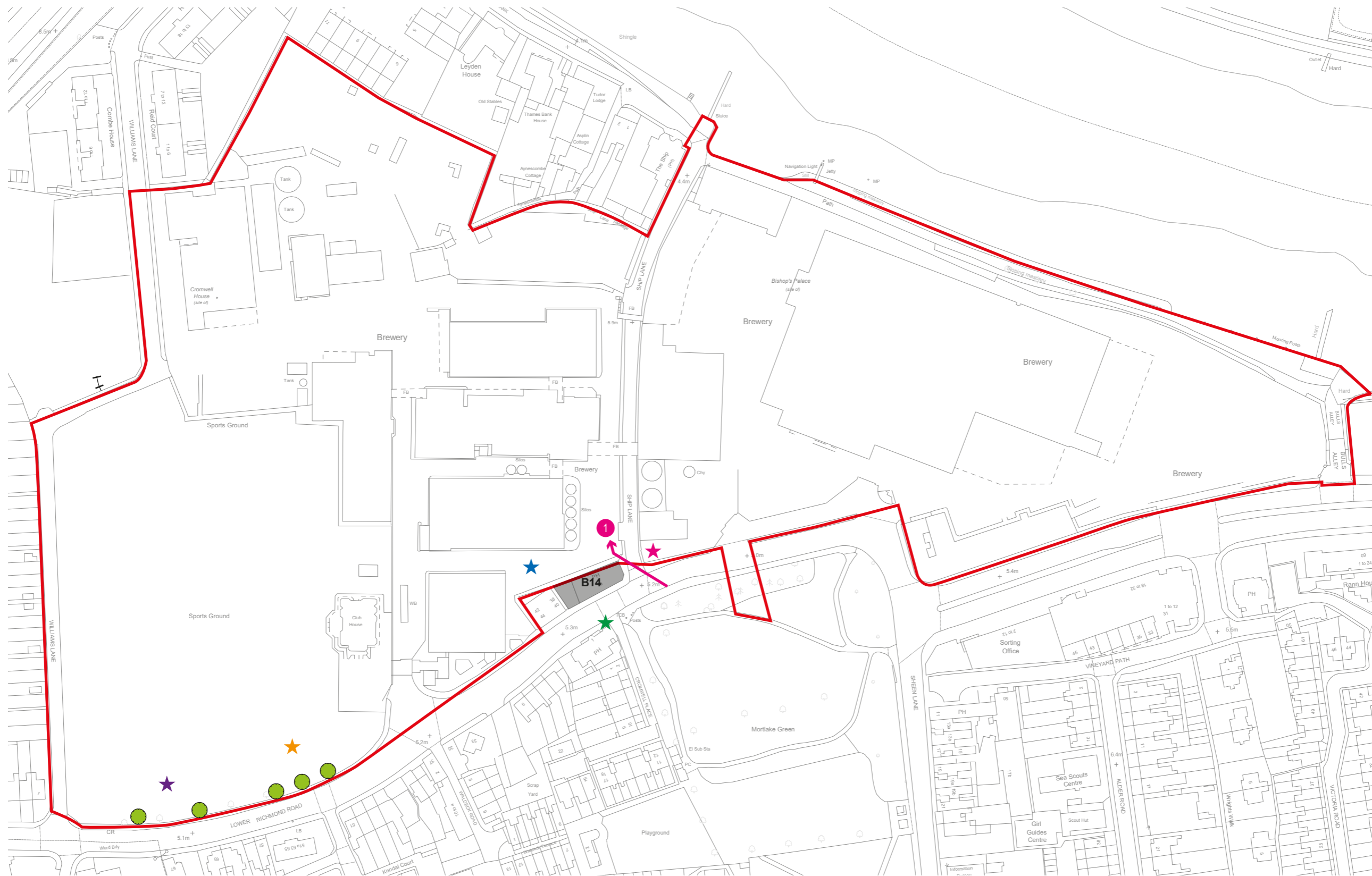
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|-----------------|---------------------|---------------------|---------------------|
| The Site | Surveyor 1 | Surveyor 2 | Surveyor 3 |
| Building Number | Surveyor 1 Location | Surveyor 2 Location | Surveyor 3 Location |
| | Bat Registration | Bat Registration | Bat Registration |
| | Bat Flight Path | Bat Flight Path | Bat Flight Path |

Project Details	WIE10667-100: Stag Brewery
Figure Title	Figure 3: Results of the Evening Emergence Bat Survey 06/07/16 - B10 and B12
Figure Ref	WIE10667-100_GR_EC_3D
Date	2018
File Location	\\s-incs\wie\projects\wie10667\100\graphics\ec\issued figures



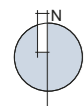
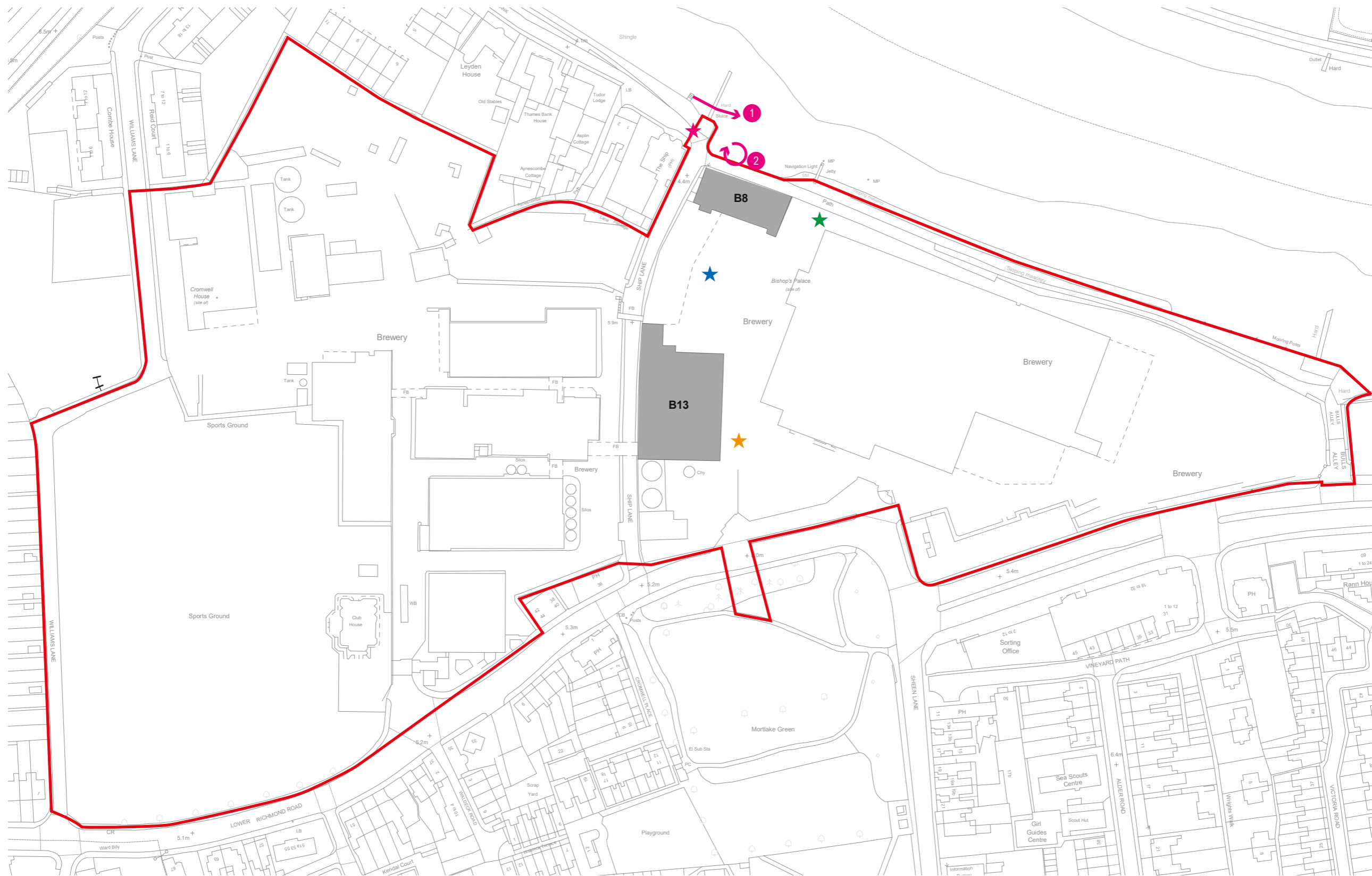
The Site	Surveyor 1 Location	Surveyor 2 Location	Surveyor 3 Location	Surveyor 4 Location	Surveyor 5 Location
Building Number	Bat Registration	Bat Registration	Bat Registration	Bat Registration	Bat Registration
Tree Subject to Survey	Bat Flight Path	Bat Flight Path	Bat Flight Path	Bat Flight Path	Bat Flight Path

Project Details	WIE10667-100: Stag Brewery
Figure Title	Figure 4: Results of the Dawn Re-entry Bat Survey 07/07/16 B14 and Trees
Figure Ref	WIE10667-100_GR_EC_4D
Date	2018
File Location	\\s-incs\wie\projects\wie10667\100\graphics\ec\issued figures



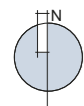
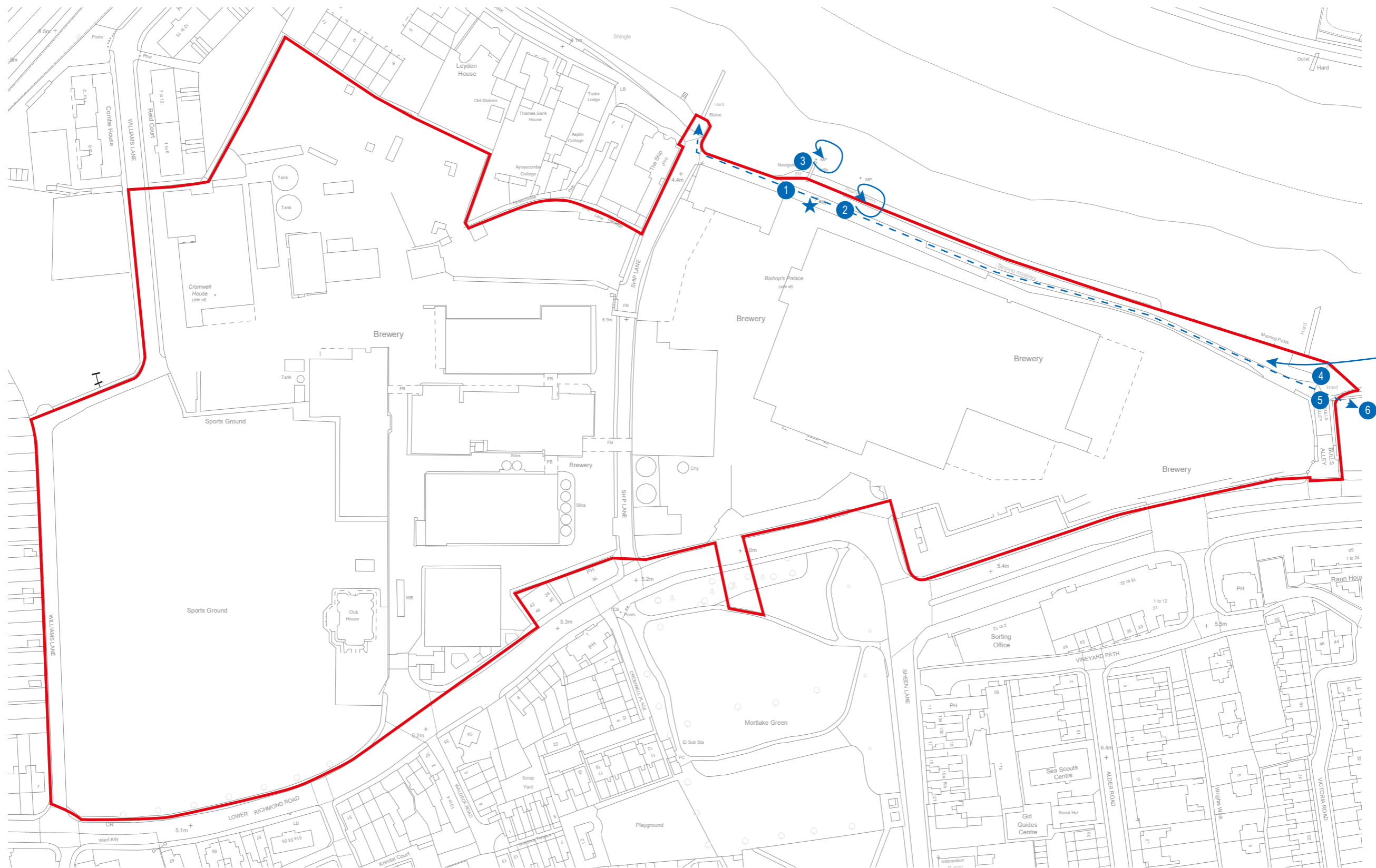
The Site	Surveyor 1	Surveyor 1 Location	Surveyor 2	Surveyor 2 Location	Surveyor 3	Surveyor 3 Location	Surveyor 4	Surveyor 4 Location	Surveyor 5	Surveyor 5 Location
Building Number	Bat Registration	Bat Registration	Bat Registration	Bat Registration	Bat Registration	Bat Flight Path	Bat Flight Path	Bat Flight Path	Bat Flight Path	Bat Flight Path
Tree Subject to Survey										

Project Details	WIE10667-100: Stag Brewery
Figure Title	Figure 5: Results of the Evening Emergence Bat Survey 19/07/16 - B14 and Trees
Figure Ref	WIE10667-100_GR_EC_5D
Date	2018
File Location	\\s-incs\wie\projects\wie10667\100\graphics\ec\issued figures



The Site	Surveyor 1	Surveyor 2	Surveyor 3	Surveyor 4
Building Number	Surveyor 1 Location	Surveyor 2 Location	Surveyor 3 Location	Surveyor 4 Location
Tree Subject to Survey	Bat Registration	Bat Registration	Bat Registration	Bat Registration
	Bat Flight Path	Bat Flight Path	Bat Flight Path	Bat Flight Path

Project Details	WIE10667-100: Stag Brewery
Figure Title	Figure 6: Results of the Dawn Re-entry Bat Survey 20/07/16 - B8 and B13
Figure Ref	WIE10667-100_GR_EC_6C
Date	2018
File Location	\\s-incs\wie\projects\wie10667\100\graphics\ec\issued figures



The Site

Location of Automated Bat Detector

Bat Activity Transect

Bat Registration

Bat Flight Path

Project Details

WIE10667-100: Stag Brewery

Figure Title

Figure 7: Results of the Evening Bat Activity Survey 13/07/17

Figure Ref

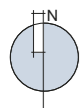
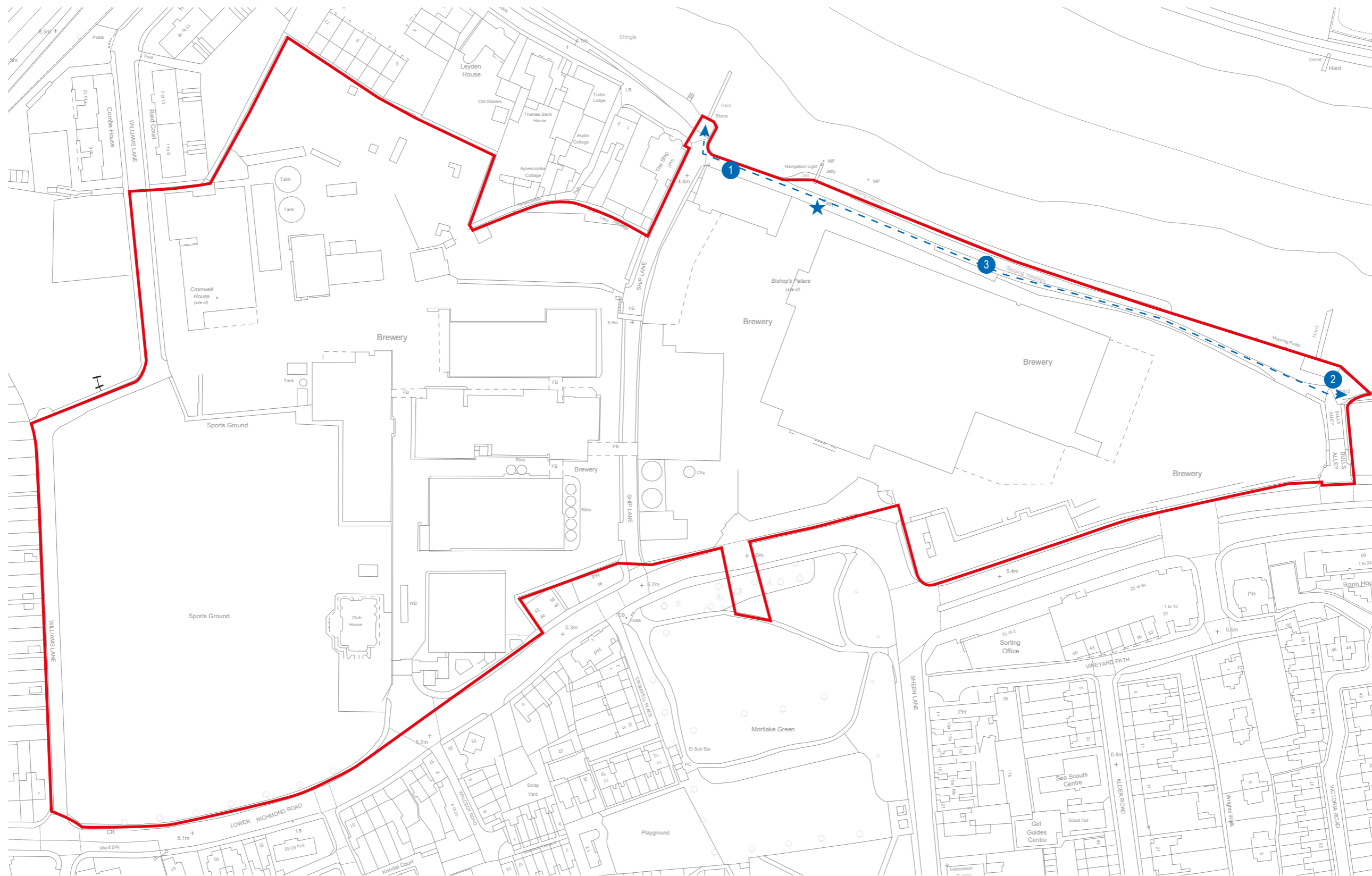
WIE10667-100_GR_EC_7B

Date

2018

File Location

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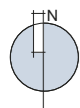
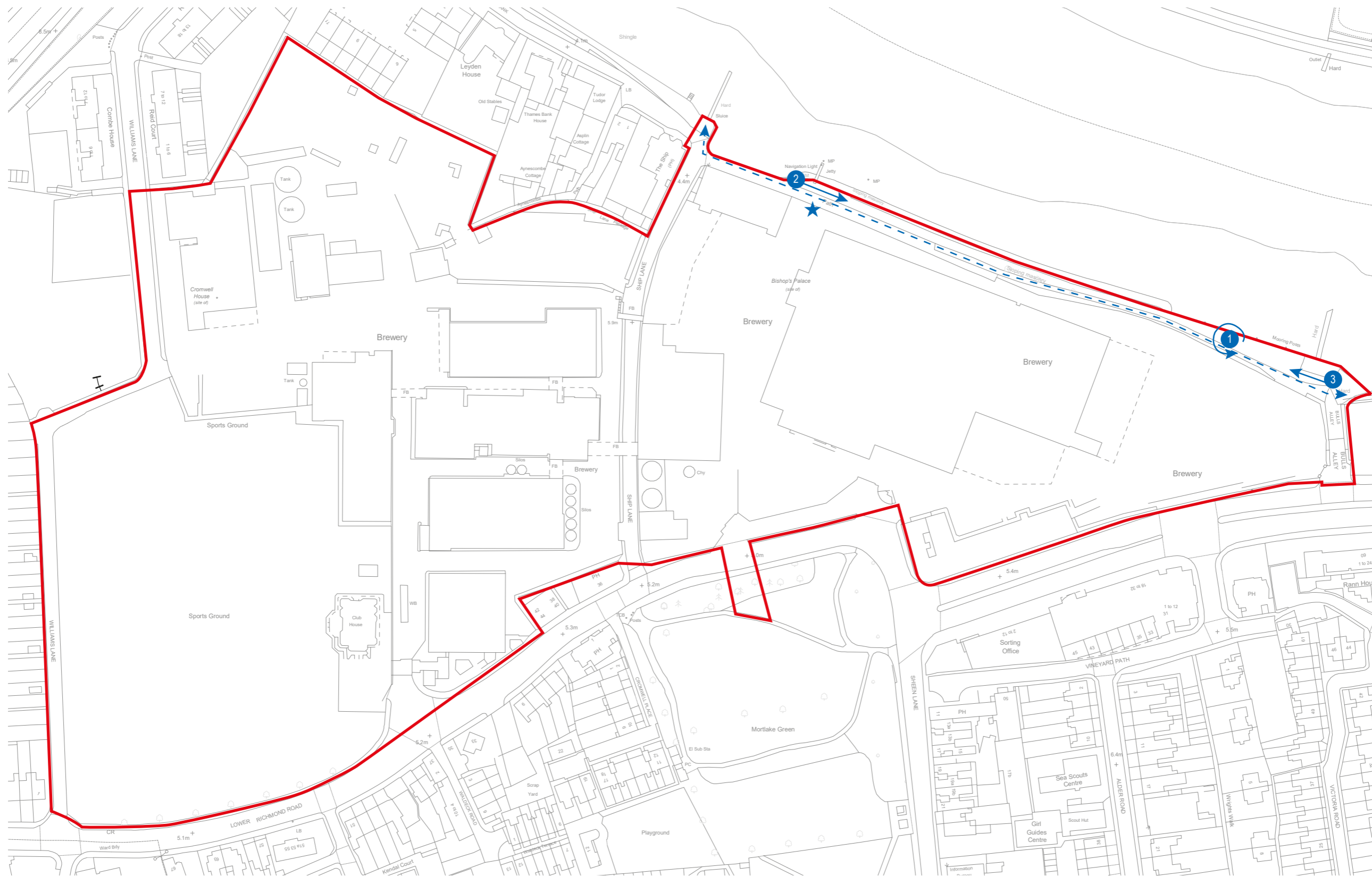
The Site

Location of Automated Bat Detector

Bat Activity Transect

Bat Registration

Project Details	WIE10667-100: Stag Brewery
Figure Title	Figure 8: Results of the Dawn Bat Activity Survey 08/08/17
Figure Ref	WIE10667-100_GR_EC_8B
Date	2018
File Location	\\s-incs\wie\projects\wie10667\100\graphics\ec\issued figures



The Site

Location of Automated Bat Detector

Bat Activity Transect

Bat Registration

Bat Flight Path

Project Details	WIE10667-100: Stag Brewery
Figure Title	Figure 9: Results of the Evening Bat Activity Survey 04/09/17
Figure Ref	WIE10667-100_GR_EC_9B
Date	2018
File Location	\\s-incs\wie\projects\wie10667\100\graphics\ec\issued figures



APPENDICES

A. Consultation with Tasha Hunter (Ecology Policy and Planning Officer serving Richmond and Wandsworth Councils)

Hannah Buck

From: Hunter, Tasha <Tasha.Hunter@richmondandwandsworth.gov.uk>
Sent: 06 July 2017 13:09
To: Lee Mantle; Lucy Thatcher
Cc: Ellen Smith; Hayley Bishop; Hannah Fiszpan
Subject: RE: Stag Brewery - Ecology

Dear Lee

Thank you for your email, this does help resolve my concerns.

However I must add a caveat, at this time I have not carried out a site visit or seen the final design of the development and depending upon how long it is between ES, planning permission and actual on site development the environmental conditions may change, I therefore reserve the right to change my comments.

Best wishes

Tasha Hunter
Ecology Policy and Planning Officer
Serving Richmond and Wandsworth Councils

Tel:- 020 8831 6125

tasha.hunter@richmondandwandsworth.gov.uk
www.richmond.gov.uk / www.wandsworth.gov.uk

From: Lee Mantle [mailto:lee.mantle@watermangroup.com]
Sent: 05 July 2017 16:55
To: Hunter, Tasha <Tasha.Hunter@richmondandwandsworth.gov.uk>; Lucy Thatcher <L.Thatcher@richmond.gov.uk>
Cc: Ellen Smith <ellen.smith@watermangroup.com>; Hayley Bishop <hayley.bishop@watermangroup.com>; Hannah Fiszpan <hannah.fiszpan@watermangroup.com>
Subject: RE: Stag Brewery - Ecology

Tasha,

As set out in Waterman IE's scoping clarification letter sent to Lucy Thatcher on the 26th June, it is our expert and professional view that undertaking bat activity surveys would not materially alter the conclusions of the ecological assessment proposed within the Environmental Statement (ES). This is due to the fact that we would reasonably assume the presence of commuting bats in and surrounding the Site based on our previous on-Site observation.

Despite the above, our client has agreed to undertake additional bat activity surveys in accordance with the methodology set out below and agreed by yourself in your email of 20th June.

We trust that undertaking the bat activity surveys will resolve your concerns.

Kind regards,

Lee

From: Tasha Hunter [<mailto:T.Hunter@richmond.gov.uk>]
Sent: 20 June 2017 15:04
To: Lee Mantle <lee.mantle@watermangroup.com>; Lucy Thatcher <L.Thatcher@richmond.gov.uk>
Cc: Ellen Smith <ellen.smith@watermangroup.com>; Hayley Bishop <hayley.bishop@watermangroup.com>
Subject: RE: Stag Brewery - Ecology

Hi Lee

Apologies for the delay I seem to have lots of planning queries all coming at once!

Thank you for providing your explanation, I do appreciate that the site currently offers limited potential for bat roosting. My main concerns are for the movement of bats along the River Thames and therefore I would like the bat activity assessed on the River Thames side/towpath and agree with your survey proposals as highlighted below.

However if bat activity surveys are still considered to be necessary by the LPA we would recommend that these are done adjacent to the river Thames only (site side) and based on best practice guidelines (Collins J, 2016), with 3 surveys undertaken in total (1 in July, August and September). In addition and if safe to do so we would deploy 2 automated (SM2) bat detectors adjacent to the river (site side) to record for 5 consecutive nights.

I also note the proposed mitigation and compliance measures and will be looking for opportunities to provide enhanced habitat for bats and other wildlife as part of the application.

Best wishes

Tasha Hunter
Ecology Policy and Planning Officer
Serving Richmond and Wandsworth Councils

Tel:- 020 8831 6125

t.hunter@richmond.gov.uk
www.richmond.gov.uk / www.wandsworth.gov.uk

From: Lee Mantle [<mailto:lee.mantle@watermangroup.com>]
Sent: 20 June 2017 07:43
To: Tasha Hunter
Cc: Ellen Smith; Hayley Bishop
Subject: Stag Brewery - Ecology

Tasha,

Many thanks for your time yesterday afternoon. As briefly discussed I have been asked to look at the scoping opinion and the request by the LPA to undertake bat activity surveys at the site. As such I thought it would be prudent to get in touch with you to firstly explain our rationale for not recommending these surveys in support of the planning application and secondly, and if still required by the LPA agree the scope moving forward.

As part of ecological surveys undertaken to date Waterman completed a Preliminary Ecological Appraisal (PEA) in March 2016 and this concluded that *'the site offers limited potential for foraging and commuting bats and it is therefore not considered necessary to undertake bat activity surveys at the site'*. Waterman however did undertake evening emergence and pre-dawn re-entry surveys as part of a Protected Species Report (PSR) at certain buildings and trees on site to determine the presence or absence of roosting bats. No roosting bats were recorded however a surveyor (me!!) was positioned outside the Ship public house (for a pre-dawn re-entry survey on the 20 July 2016) and recorded a single serotine commuting pass and one/two commuting and foraging noctule bats, level and species that you would expect given the light spill from the site and existing street/road lighting present (I was surprised that no pipistrelle bats were recorded on that survey however!!). Other surveys at the buildings and trees on the site recorded noctule, soprano and common pipistrelle bats, again level and species you would expect given

the habitats and lighting on site. It is noted that none of the species recorded are sensitive to lighting, unlike bat species from the myotis and plecotus family.

As part of the PEA and PSR mitigation/compliance measures were made to inform the scheme design for the development to both minimise/avoid impacts on ecological features during the construction and completed development phase and to enhance the site for bats. These measures included;

- The provision of a Construction Environmental Management Plan (CEMP) including ways to minimise avoid impacts form light, noise and vibration
- The provision of a sensitive lighting strategy post construction
- The provision of enhanced foraging and commuting habitat across the Site including an area adjacent to the River Thames
- The provision of enhanced roosting habitat

There is the opportunity to enhance the Site for bats and to also minimise any noise and vibration impacts to foraging and commuting bats. However whilst we are aware of research papers that detail disturbance events at bat roosts from excessive noise and vibration, we are not aware of any proven disturbance events to foraging and commuting bats from these indirect impacts. This is there not assessed to be a potential impact as a result of the development as noted in the scoping opinion. With regards to lighting, with the provision of no night time working during the construction period and a sensitive lighting strategy we would assumed that lighting as a result of the completed Development stage, would have negligible impacts on foraging and commuting bats.

However if bat activity surveys are still considered to be necessary by the LPA we would recommend that these are done adjacent to the river Thames only (site side) and based on best practice guidelines (Collins J, 2016), with 3 surveys undertaken in total (1 in July, August and September). In addition and if safe to do so we would deploy 2 automated (SM2) bat detectors adjacent to the river (site side) to record for 5 consecutive nights.

I hope the above provides sufficient justification of why we did not recommended the bat activity surveys, however and if deemed to still be required I would be grateful if you would comment on the brief scope I have pulled together so we can agree a way forward.

As discussed in am in the office today and tomorrow to discuss the issues and answer any queries you may have.


Regards

Lee Mantle
Associate Director
Ecologist
Waterman Infrastructure & Environment Ltd

T - 0330 060 4327

www.watermangroup.com | [LinkedIn](#) | [Twitter](#)

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B. Evening Emergence and Dawn Re-entry Survey Results

Time	Point on Figure 3	Bat Species	Activity
Evening Emergence Survey 06/07/16 – Surveyor 1 (B10)			
22:20	N/A	Soprano pipistrelle	Heard not seen – one pass.
Evening Emergence Survey 06/07/16 – Surveyor 2 (B10)			
22:22	1	Common pipistrelle	Foraging under tree canopy on edge of Mortlake Green.
Evening Emergence Survey 06/07/16 – Surveyor 3 (B12)			
22:03	N/A	Common pipistrelle	Heard not seen – one pass, faint call.
22:07	N/A	Common pipistrelle	Heard not seen – one pass.
22:13	N/A	Common pipistrelle	Heard not seen – one pass.
22:17	N/A	Common pipistrelle	Heard not seen – one pass.
22:26	N/A	Common pipistrelle	Heard not seen – one pass.
22:39	N/A	2 x Soprano pipistrelle	Heard not seen – one pass.
22:43	N/A	Common pipistrelle	Heard not seen – one pass.
22:45	N/A	Common pipistrelle	Heard not seen – one pass.
22:50	N/A	Common pipistrelle	Heard not seen – one pass.

Time	Point on Figure 4	Bat Species	Activity
Dawn Re-entry Survey 07/07/16 – Surveyor 1 (B14)			
04:30	N/A	Noctule	Heard not seen – one pass.
Dawn Re-entry Survey 07/07/16 – Surveyor 2 (B14)			
03:28	N/A	Common pipistrelle	Heard not seen – foraging.
03:30	N/A	Common pipistrelle	Heard not seen – foraging.
03:32	N/A	Common pipistrelle	Heard not seen – foraging.
03:41	N/A	Soprano pipistrelle	Heard not seen – foraging.
Dawn Re-entry Survey 07/07/16 – Surveyor 3 (B14)			
03:46	N/A	Common pipistrelle	Heard not seen – one pass.
Dawn Re-entry Survey 07/07/16 – Surveyor 4 (Trees)			

Time	Point on Figure 4	Bat Species	Activity
03:25	N/A	Common pipistrelle	Heard not seen – one pass.
03:41	N/A	Common pipistrelle	Heard not seen – one pass.
03:50	N/A	Soprano pipistrelle	Heard not seen – one pass.
04:22	1	Noctule	Commuting south-east to north-east at approximately 10m above ground level.
Dawn Re-entry Survey 07/07/16 – Surveyor 5 (Trees)			
03:20	N/A	Common pipistrelle	Heard not seen – one pass.
03:45	N/A	Common pipistrelle	Heard not seen – one pass.
03:58	N/A	Common pipistrelle	Heard not seen – one pass.
04:27	1	Noctule	Foraging in playing field at approximately 8m above ground level, then flew off in a southerly direction.

Time	Point on Figure 5	Bat Species	Activity
Evening Emergence Survey 19/07/16 – Surveyor 1 (B14)			
No bats recorded.			
Evening Emergence Survey 19/07/16 – Surveyor 2 (B14)			
21:44	1	Common pipistrelle	Commuting at 8m above ground level from the park into the Site in a NW direction (not recorded, faint call).
21:46	1	2 x Common pipistrelle	Commuting at 8m above ground level from the park into the Site in a NW direction.
21:51	N/A	Soprano pipistrelle	Heard not seen – one pass.
21:54	1	Common pipistrelle	Commuting at 8m above ground level from the park into the Site in a NW direction.
22:10	N/A	Soprano pipistrelle	Heard not seen – one pass.
22:24	N/A	Common pipistrelle	Heard not seen – one pass.
22:29	N/A	Noctule	Heard not seen – one pass.
22:35	N/A	Common pipistrelle	Heard not seen – one pass.
Evening Emergence Survey 19/07/16 – Surveyor 3 (B14)			
21:45	N/A	Common pipistrelle	Heard not seen – the direction of the call appeared to come from Mortlake Green.
21:46	N/A	Pipistrelle sp	Heard not seen – the direction of the call appeared to come from Mortlake Green (not recorded).
21:50	N/A	Soprano & Common pipistrelle	Foraging, heard not seen – the direction of the call appeared to come from Mortlake Green.
21:54	N/A	Common pipistrelle	Foraging, heard not seen – the direction of the call appeared to come from Mortlake Green.
22:24	N/A	Common pipistrelle	Foraging, heard not seen – the direction of the call appeared to come from Mortlake Green.
22:36	N/A	Common pipistrelle	Foraging, heard not seen – the direction of the call appeared to come from Mortlake Green.
Evening Emergence Survey 19/07/16 – Surveyor 4 (Trees)			

Appendices

Time	Point on Figure 5	Bat Species	Activity
22:14	N/A	Common pipistrelle	Heard not seen – one pass.
22:39	N/A	Soprano pipistrelle	Heard not seen – one pass.
Evening Emergence Survey 19/07/16 – Surveyor 5 (Trees)			
No bats recorded.			

Time	Point on Figure 6	Bat Species	Activity
Dawn Re-entry Survey 20/07/16 – Surveyor 1 (B8)			
No bats recorded.			
Dawn Re-entry Survey 20/07/16 – Surveyor 2 (B8)			
03:42	1	Serotine and Noctule	Commuting over River Thames at 10m above water level in an easterly direction.
03:43	N/A	Noctule	Heard not seen – foraging.
03:47	2	Noctule	Foraging over River Thames at 10m above ground level.
03:50	2	Noctule	Constant foraging over River Thames at 10-15m above ground level.
Dawn Re-entry Survey 20/07/16 – Surveyor 3 (B8)			
No bats recorded.			
Dawn Re-entry Survey 20/07/16 – Surveyor 4 (B13)			
No bats recorded.			

C. Bat Activity Survey Results

Time	Point on Figure 7	Bat Species	Activity
Evening Activity Survey 13/07/17			
21:41	1	Soprano pipistrelle	Commuting 6m above ground level over river in an easterly direction.
21:43	2	Soprano pipistrelle	Constant foraging (10+ passes) by two bats at 0-8m above ground level.
22:05	2	Common pipistrelle	Heard not seen, one pass.
22:17	3	Common pipistrelle	Foraging (5+ passes) by two bats at 0-8m above ground level.
22:26	4	Soprano pipistrelle	Heard not seen, one pass.
22:32	4	Common pipistrelle	Commuting 8m above ground level along river back to site side.
22:35	5	Common pipistrelle	Heard not seen, one pass.
22:39	6	Common pipistrelle	Heard not seen, one pass.

Time	Point on Figure 8	Bat Species	Activity
Dawn Activity Survey 08/08/17			
04:02	1	Common pipistrelle	Heard not seen, one pass.
04:31	2	Soprano pipistrelle	Heard not seen, one pass.
05:02	3	Common pipistrelle	Heard not seen, one pass.

Time	Point on Figure 8	Bat Species	Activity
Evening Activity Survey 04/09/17			
20:19	1	Soprano pipistrelle	Numerous passes, foraging under the tree canopy 4-6m above ground level.

Time	Point on Figure 8	Bat Species	Activity
20:23	2	Common pipistrelle	Commuting 8m above ground level west to east.
20:50	3	Common pipistrelle	Commuting 8m above ground level east to west.

D. Bird Species Recorded During the Black Redstart Survey

Summary of Results

Species Code	Species Name	Visit No	1	2	3	4	5	All Visits
		Date	13/05/2016	26/05/2016	06/06/2016	17/06/2016	29/06/2016	
B.	Blackbird		X	X	X	O	O	X
BH	Black-headed gull				X	X	X	X
BT	Blue tit		O	O	X	X	X	O
C.	Carrion crow		X	X	X	X	X	X
CA	Great cormorant					O	O	O
CH	Common chaffinch				X			X
CN †	Common tern		O	O				O
D. *	Dunnock			O	O		O	O
EG	Egyptian goose						(F)	(F)
FP	Feral pigeon		X	X	X	X	X	X
GC	Goldcrest						X	X
GL	Grey wagtail		X	X	X	X	X	X
GO	European goldfinch		O	F	X	X	O/F	X
GR	European greenfinch			F	F			F
GT	Great tit		O	O	X	O	O	X
H.	Grey heron						O	O
HG *	Herring gull		X	X	X	X	X	X
J.	Eurasian jay		X	X	O		X	X
JD	Western jackdaw				O	F	(F)	F / O
KF †	Common kingfisher			(F)				(F)
LB	Lesser black-backed gull		X	X	X	X	X	X
MA	Mallard		O	O	F	O	O	F / O
MG	Magpie		X	X	X		X	X
MS	Mute swan			O			O	O
PW	Pied wagtail			X				X
R.	Eurasian robin		X	X	X	X	X	X

Species Code	Species Name	Visit No	1	2	3	4	5	All Visits
		Date	13/05/2016	26/05/2016	06/06/2016	17/06/2016	29/06/2016	
RI	Ring-necked parakeet		X	X	F	F	F/O	X
SD	Stock dove			X	X			X
SG *	Common starling		F/O	X	X	O	X	X
SI	Common swift			F			(F)	F
ST * †	Song thrush			O		O		O
WP	Wood pigeon		X	X	X	X	X	X
WR	Eurasian wren		X	X	X	X	X	X
No. Species			18	26	23	19	26	33

Key:

Red-listed Species	X - Seen within Site boundary
Amber-listed Species	O - Seen outside redline (Site) boundary
Schedule 1 Species	F - Overflying Site
* - S41 Priority species	(F) - Overflying outside Site boundary
† - Annex 1 species	
‡ - LBAP Priority Species	

Description of the Status of Bird Species Recorded on-Site

Species	Description of Species Status on-Site
Blackbird <i>Turdus merula</i>	Recorded on-Site on Visits 1-3. Two birds were holding territories to the north of the Site. The species is not believed to have bred on the Site itself, but almost certainly will have bred adjacent to the Site, despite no young being seen.
Black-headed gull <i>Chroicocephalus ridibundus</i>	Seen on three occasions (Visits 3, 4 and 5) feeding on the amenity grassland at the west of the Site. This species does not

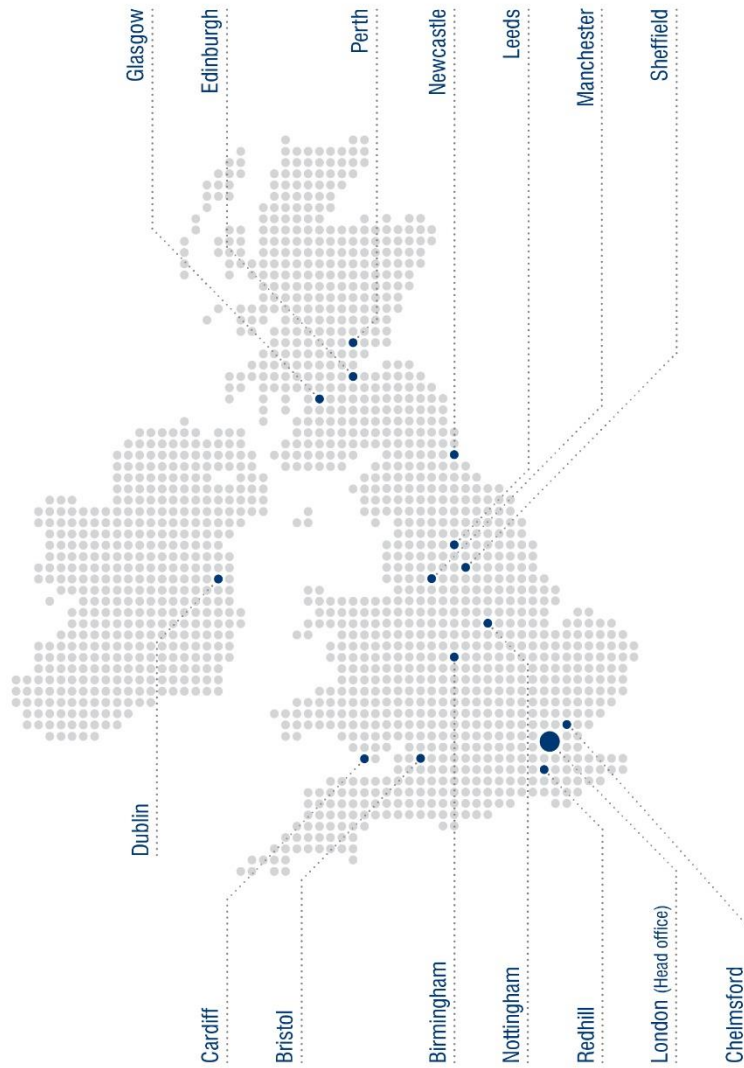
Appendices

Species	Description of Species Status on-Site
	breed on-Site, but does breed at the WWT London Wetland Centre and Leg O' Mutton Reservoir nearby.
Blue tit <i>Cyanistes caeruleus</i>	Present in small numbers around the Site. A nest thought to be of this species was located on the outside of the north wall of the Site (on the towpath) on Visit 3. It is also likely that the species breeds in the gardens and along the towpath to the north of the Site and possibly in the amenity park to the south of the Site.
Carrion crow <i>Corvus corone corone</i>	At least one pair present on the Site on all visits. No evidence of breeding on the Site was recorded, though there are several suitable trees to the north and south of the Site that provide nesting opportunities.
Common chaffinch <i>Fringilla coelebs</i>	A male was singing on the northern boundary of the Site on Visit 3. The species probably breeds nearby, but was not recorded breeding on-Site.
Feral pigeon <i>Columba livia</i>	Common around the Site. A nest with calling chicks was located on Visit 4.
Goldcrest <i>Regulus regulus</i>	A single bird was seen in the south-west corner of the Site during Visit 5. Several other birds were heard adjacent to the west edge of the Site in Williams Lane during this visit, including a singing male. It is therefore presumed that the bird was part of a fledged brood from a nest in Williams Lane.
Grey wagtail <i>Motacilla cinerea</i>	A pair was present in the south-western corner of the eastern part of the Site throughout the survey. Two recently fledged young were seen on Visit 3, proving breeding on the Site. It is thought that the nest was situated in the vicinity of the silos (which were not accessible, so could not be checked). On Visits 4 and 5, the male was still singing, though there was no sign of the female – presumably she was sitting on eggs again.
Goldfinch <i>Carduelis carduelis</i>	Small numbers were seen around the Site on Visits 3 and 4, though no proof of breeding was observed. It is possible that this species could have bred on-Site, or if not almost certainly did adjacent to the Site, as singing birds were recorded on most visits outside the red-line boundary.
Great tit <i>Parus major</i>	Birds were seen adjacent to the north side of the Site, but were not present as a breeding species on the Site. Fledged young were seen on Visit 4 at the northern end of Ship Lane, proving that breeding did occur near to the Site (probably in trees along the towpath).
Herring gull <i>Larus argentatus argenteus</i>	Birds were seen frequently circling over the Site (especially the eastern section) and were also seen feeding on the amenity grassland at the western edge of the Site. The species does not breed on the Site.

Species	Description of Species Status on-Site
Eurasian jay <i>Garrulus glandarius</i>	A single bird was seen on the amenity grassland during Visit 1 and a family party was located in the northwest corner of the Site during Visit 5. It is possible that this species nests in the trees in the northwest corner of the Site, or nearby, just outside the red-line boundary.
Jackdaw <i>Corvus monedula</i>	A single bird was seen in the eastern section on Visit3. The species does not breed on-Site – most of the observations related to birds overflying the Site.
Lesser black-backed gull <i>Larus fuscus graelsii</i>	Seen on all Visits in varying numbers. A pair frequented the rooftops of the eastern part of the Site. No evidence of breeding was found, though this pair did show territorial behaviour. Birds were also seen feeding on the amenity grassland at the west of the Site.
Magpie <i>Pica pica</i>	It is thought that a pair of magpie nested in a tree bordering the amenity grassland at the south-western corner of the Site, as they showed aggressive behaviour towards a carrion crow. Another nest may have been present near the Ship Inn public house to the north of the Site. Parties of birds were seen through it could not be ascertained if these were family parties or a loose flock.
Pied wagtail <i>Motacilla alba yarellii</i>	A single bird was located on the top of one of the roofs in the eastern section on Visit 2. The Site is suitable for this species to breed but perhaps the presence of breeding grey wagtail led to inter-specific competition.
Eurasian robin <i>Erithacus rubecula</i>	Robin were present in small numbers, mainly at the northern edge of the western section. No evidence of breeding was noted, but the species probably bred in or adjacent to this area.
Ring-necked parakeet <i>Psittacula krameri</i>	This species was frequently seen overflying the site, usually in a southerly direction from a roost located on the north of the River. Birds were occasionally seen in trees on the Site. The species showed no evidence on breeding on the Site.
Stock dove <i>Columba oenas</i>	This species was seen feeding on the amenity grassland during Visits 3 and 4. All the birds appeared to be adults, but the possibility of some being juveniles from earlier in the year cannot be ruled out. The species was not seen to be breeding on the Site – rather they probably nest in trees either on the amenity parkland to the south of the Site or in a nearby garden.
Common starling <i>Sternus vulgaris</i>	This species was seen occasionally, mostly overflying the Site. A pair was found nest-building in a disused drainpipe on the outside wall of the Site adjacent to Mortlake High Street during Visit 3 but there was no sign of any nest during the subsequent Visits. Birds were seen to be nesting in houses that backed onto Williams Lane and a family party were seen on the amenity

Species	Description of Species Status on-Site
	grassland during Visit 3. A bird was also seen on territory on a house to the south of the amenity grassland on the lower Richmond Road.
<i>Wood pigeon Columba palumbus</i>	Several birds present, mainly around the trees at the north-west of the Site and feeding on the amenity grassland. May have bred in the north-western area, though no definite young seen.
<i>Eurasian wren Troglodytes troglodytes</i>	Several birds were present on the Site perimeter, either in the gardens to the north, along the towpath or in the amenity park to the south of the Site. This species is not thought to have bred in the Site though it almost certainly did nearby.

UK and Ireland Office Locations



C. Appendix 13.3: Water Framework Directive (WFD) screening request and response

APPENDIX 13.3
WATER FRAMEWORK DIRECTIVE (WFD) SCREENING REQUEST AND
RESPONSE

Ellen Smith

From: Ros Boalch
Sent: 13 October 2017 14:23
To: 'Martyn, Joe'
Cc: Hannah Fiszpan; Ellen Smith; 'Wyatt, Kayleigh'
Subject: RE: Stag Brewery, Mortlake - WFD Screening
Attachments: WIE10667-101-1-3-4-RB-HF_Formal_Submission.pdf; Stag Brewery, Mortlake - WFD Screening [Filed 20 Jul 2017 15:02]

Joe,

Thank you for following up in writing, and we note the recommendation that a WFD assessment is required to “*assess the missed opportunity for ecological enhancement*”. This is contrary to the discussions you had in July with my colleague Ellen Smith.

As you will be aware, the initial request for consideration of WFD came as a consultation response to the request for an Environmental Impact Assessment (EIA) Scoping Opinion submitted to the London Borough of Richmond in March 2017. As indicated in the EIA Scoping Report submitted with the request for a Scoping Opinion (attached for convenience) we outlined:

- The Site for which planning permission is sought (and is subject to the EIA) includes the former Stag Brewery comprising the former Stag Brewery estate which includes 16 industrial buildings surrounded largely by hard-standing. This is an area of approximately 8.5 hectares, of which the tow path comprises a small component.
- Ecology is scoped into the EIA, and to support the assessment the following have been undertaken:
 - Preliminary Ecological Appraisal (PEA) comprising an ecological desk study, an ‘Extended’ Phase 1 Habitat Survey, a search for common invasive floral species and preliminary roost inspection at buildings (external) and trees (ground based).
 - A black redstart, and other protected bird species survey.
 - Bat Evening Emergence and Dawn Re-entry Surveys.
 - Bat Activity Surveys including an Automated Bat Detector Surveys
- Proposals for soft and hard landscaping (including proposals for ecological enhancements) will be incorporated into the design. These bespoke proposals are being informed by the ecological studies undertaken at the site to ensure they are appropriate, which may be in proximity to the tow path. Further details of the ecological enhancements, and full reports of the ecology studies will be provided as part of the forthcoming planning application.

In respect of further ecological enhancement to the banks of the river itself, as these are outside the Applicant’s ownership and modifications are not required to support the planning application, no opportunity for the Applicant to implement ecological enhancements in this area can be realised.

On this basis, we do not consider that a WFD assessment is required as the Development proposals do not include any significant changes to the foreshore or tow path that would not cause deterioration of the watercourse (even immediately adjacent to the Development). Furthermore, although the Development involves works and replacement of the existing flood defence wall (further details set out in Ellen’s email dated 20.7.17, as attached) this would not cause deterioration of the waterbody. Therefore, we consider that it would be compliant with the requirements of the Water Environment Regulations (Water Framework Directive), 2017.

Kind regards,

Ros Boalch
Principal Consultant
Waterman Infrastructure & Environment Ltd
Pickfords Wharf | Clink Street | London SE1 9DG
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Ellen Smith

From: Martyn, Joe <joseph.martyn@environment-agency.gov.uk>
Sent: 05 October 2017 17:11
To: Ellen Smith
Subject: RE: Stag Brewery, Mortlake - WFD Screening

Hi Ellen

Sorry to not get back to you sooner. I have checked with the officer who leads on WFD and he is of the opinion that if works are being done to the path but not to the bank then a WFD assessment will be required to assess the missed opportunity for ecological enhancement.

Kind regards

Joe Martyn
Planning Specialist- South London

Environment Agency | South East | Kent and South London | London
' 020 3025 5546 ✉ kslplanning@environment-agency.gov.uk
Address: Environment Agency, Ergon House, Horseferry Road, London, SW1P 2AL

From: Ellen Smith [mailto:ellen.smith@watermangroup.com]
Sent: 19 September 2017 17:21
To: Martyn, Joe
Subject: RE: Stag Brewery, Mortlake - WFD Screening

Joe,

Sorry to pester, but could I please have a response in writing to confirm a WFD assessment is not required?

Thank you,
Ellen

Ellen Smith
Senior Consultant
Waterman Infrastructure & Environment Ltd

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From: Ellen Smith
Sent: 08 September 2017 17:03
To: Martyn, Joe <joseph.martyn@environment-agency.gov.uk>; Wyatt, Kayleigh <kayleigh.wyatt@environment-agency.gov.uk>
Cc: Ros Boalch <ros.boalch@watermangroup.com>; Pippa Kelly <pippa.kelly@watermangroup.com>; Hannah Fiszpan <hannah.fiszpan@watermangroup.com>
Subject: FW: Stag Brewery, Mortlake - WFD Screening

Joe,

As discussed, please see attached plans showing the proposed works to the tow path. I can confirm that the works will not extend to the river bank. As shown on the attached, enhancement works to the towpath would include new pavement and stairs.

I look forward to your formal written response.

Thank you,
Ellen

Ellen Smith
Senior Consultant
Waterman Infrastructure & Environment Ltd

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From: Ellen Smith
Sent: 20 July 2017 09:46
To: Martyn, Joe <joseph.martyn@environment-agency.gov.uk>; Wyatt, Kayleigh <kayleigh.wyatt@environment-agency.gov.uk>
Cc: Ros Boalch <ros.boalch@watermangroup.com>; Pippa Kelly <pippa.kelly@watermangroup.com>; Hannah Fiszpan <hannah.fiszpan@watermangroup.com>
Subject: Stag Brewery, Mortlake - WFD Screening

Dear Joe / Kayleigh,

I am writing regarding the Environment Agency's (EA) comments on the EIA Scoping Opinion for Stag Brewery, Mortlake (dated 30/06/2017), which stated that a Water Framework Directive (WFD) Assessment should be undertaken. Could you please forward this email on to the relevant EA biodiversity officer?

We note that the Site lies adjacent to the Thames Upper part of the River Thames, classified a heavily modified transitional water body. Based on the 2016 data, the Thames Upper has been assessed as having a 'Moderate' Ecological Potential and has a 'Fail' in relation to its chemical status (with regard to tributyltin compounds).

We have briefly considered potential impacts on the Ecological Potential of the Thames Upper waterbody as a result of the proposals at Stag Brewery as follows:

- The development involves replacing the existing flood defence wall bordering the Site (approx. 368m in length) with a new wall (see attached photograph and draft plan proposals). The new flood defence wall would be constructed behind the existing flood defence wall using sheet piling to ensure the Site remains protected against flooding. The flood defence wall is located approximately 6 metres away from the river bank. The river bank and foreshore will remain as per existing.
- The existing flood defence wall is made of brick and from a condition survey appears to be in a poor to fair condition. Vegetation was identified growing on and against the flood defence wall, although results of the Phase 1 Habitat survey indicate these to be of limited ecological value. Given this and its distance from the River Thames (tidal water levels would only rise to the flood defence wall during very high spring tides), the flood defence wall is unlikely to offer any suitable habitat for macro-invertebrates or aquatic plants and its removal would not affect biological WFD Quality Elements.

- The proposals would also involve the construction of new surface water outfalls into the River Thames. However it would be ensured that oil interceptors and silt traps are provided to reduce the risk of any contamination entering the River Thames from any proposed car parking areas. The Development would not give rise to any land uses likely to lead to significant contamination and preliminary analysis has found ground contamination in the Made Ground and shallow soils to be minor, meaning there are unlikely to be significant impacts from any mobilisation. Tide locking mechanisms would be provided so that the outfalls would not be required to discharge at height above the Thames foreshore and thereby would not affect the hydromorphology of the river bed. Furthermore, as there are already existing outfalls that drain from the Site to the river, additional outfalls would result in little change to existing conditions, or be any more significant than when the Site used to be operational as an industrial site.

The scheme is currently being prepared for a planning application and full details of the development proposals will be available at this time. However, this preparation will not affect the current proposals regarding the river wall and the fact that there will not be any riparian works.

For the reasons set out above, we do not feel that a WFD assessment is required as the Development proposals do not include any significant changes to the River Thames flood defences or foreshore and would not cause deterioration of the waterbody (even immediately adjacent to the Development). Therefore, we consider that it would be compliant with the requirements of the Water Environment Regulations (Water Framework Directive), 2017.

In view of our client's programme to planning, we request your views and response to the above matters as soon as possible. We look forward to hearing from you and would be happy to discuss further, if required.

Kind regards,
Ellen

Ellen Smith
Senior Consultant
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