



Stag Brewery, Mortlake – Permanent Filming Use Application

Protected Species Report

July 2023

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Comments

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1. Introduction

- 1.1. This Protected Species Report (PSR) has been prepared by Waterman Infrastructure & Environment Limited (Waterman IE) on behalf of Reselton Properties Limited (hereafter referred to as the 'Applicant') to accompany a planning application for the permanent use of land for film production operations and ancillary activities at the former Stag Brewery site (hereafter referred to as the 'Site'). The application would be limited in duration by a legal agreement, so that it would not preclude the hybrid 2022 planning application being considered at the Site (Application A, planning ref: 22/0900/OUT) and the detailed school application (Application B, planning ref: 22/0902/FUL) coming forward as and when these are granted planning permission. The Site is located in Mortlake, south west London within the administrative boundary of the London Borough of Richmond upon Thames (LBRuT) (**Figure 1**).

Proposed Development

- 1.2. The Applicant is seeking planning permission (hereafter referred to as the proposed 'Development') with the film production operations and ancillary activities limited internally to buildings 10/11, 12, 14 and 15 as well as yard areas in the east of the Site (including parking) (**Figure 2**). The East Gatehouse (building 15) will be used for security purposes and the Sports Pavilion (building 14) will be used intermittently for filming set locations. Filming will also take place externally (**Figure 2**) as adjacent to building 6 and building 9 (also known as the Maltings).
- 1.3. For locations external filming is proposed, lighting will be used as required. Lighting shall only be used where necessary for filming, and for the minimum duration required. Lighting professionals will supervise the use of all lighting. We have currently assessed the potential impact of lighting on this basis, as it is not possible to develop a detailed lighting plan at this stage.
- 1.4. All buildings are being applied for use, with all necessary information provided at this stage for Buildings 11, 12, 14 and 15 (with the other buildings only to be used following the submission of further details via condition).
- 1.5. In the future, if an additional tenant and/or filming and associated operations are required in the western areas of the Site, or within other buildings, this would be subject to a review of the environmental implications and would be secured by a suitably worded planning condition.
- 1.6. The application would be limited in duration by a legal agreement, so that it would not preclude the hybrid 2022 planning application being considered at the Site (Application A, planning ref: 22/0900/OUT) and the Detailed Application School (Application B, planning ref: 22/0902/FUL) coming forward as and when these are granted planning permission.
- 1.7. For full details of the proposed operations and activities as part of the proposed Development please refer to the Environmental Assessment Report submitted with the planning application.

Historical Ecological Survey Work

- 1.8. Historical ecological surveys have been undertaken at the Site dating back to 2016 and 2017. Surveys in 2016 and 2017 were undertaken to accompany three separate planning applications for the Site, which were submitted to the London Borough of Richmond-Upon-Thames (LBRuT) in 2018 (ref. 18/0547/FUL, 18/0548/FUL and 18/0549/FUL) as detailed below:
- Application A – hybrid planning application for comprehensive mixed-use redevelopment of the former Stag Brewery site consisting of:

- Land to the east of Ship Lane applied for in detail (referred to as ‘Development Area 1’ throughout); and
 - Land to the west of Ship Lane (excluding the school) applied for in outline (referred to as ‘Development Area 2’ throughout).
 - Application B – detailed planning application for the school (on land to the west of Ship Lane).
 - Application C – highways and landscape works at Chalkers Corner.
- 1.9. The ecological survey work in support of the LBRuT planning applications detailed above comprised an initial Preliminary Ecological Assessment (PEA) (ref. WIE10667-100-R-1-3-1-PEA). Based on the results of this PEA further surveys as detailed in a PSR (ref. WIE10667-100-R-7-3-1-PSR) were also undertaken between 2016 and 2017.
- 1.10. Following the Applicant submitting revisions to the Greater London Authority (GLA) in 2020 (ref. 4172 (Application A), 4172a (Application B) 4172b (Application C - withdrawn)) ecological survey works comprising an updated PEA (ref. WIE15582-102_R_1_2_3_PEA) together with further update surveys as detailed in a Protected Species Report (ref. WIE15582-102-R-2-3-1-PSR) were also undertaken in 2019.
- 1.11. The applications submitted in 2020 detailed above to the GLA were refused in July 2021. A revised planning application was submitted to LBRuT in March 2022 (ref. 22/0900/OUT (Application A) and 22/0902/FUL (Application B)).
- 1.12. A summary of all the historical ecological survey work undertaken in support of the above planning applications is presented in **Table 1** below.

Table 1: Historical Ecological Survey Work

| Planning Application Ref | Ecological Survey Work Undertaken | Date of Assessment and Reporting |
|---|--|---|
| | PEA (ref. WIE10667-100-R-1-3-1-PEA) - comprising an ecological data search, ‘Extended’ Phase 1 Habitat Survey, a search for common invasive floral species, and a Preliminary Roost Assessment (PRA) (ground based and external only) of buildings and trees for bats. | PEA components undertaken between January 2016 to April 2017 with reporting finalised in February 2018. |
| LBRuT -18/0547/FUL, 18/0548/FUL, and 18/0549/FUL (the 2018 Planning Applications) | PSR (ref. WIE10667-100-R-7-3-1-PSR) - comprising a Preliminary Roost Assessment (ground based and external only) of accessible buildings, evening emergence and pre-dawn re-entry bat surveys at buildings and trees, bat activity and automated surveys, and breeding bird surveys (specifically for black redstart <i>Phoenicurus ochruros</i>) | PSR components undertaken between May 2016 to September 2017 with reporting finalised in February 2018. |
| | PRA (ref. WIE10667-103-BN-21-2-LM) – comprising an external and endoscope inspection of the northern boundary wall. | PRA of the northern boundary wall undertaken in October 2018 with reporting also finalised in October 2018. |

| Planning Application Ref | Ecological Survey Work Undertaken | Date of Assessment and Reporting |
|---|--|---|
| GLA - ref 4172, 4172a, and 4172b (withdrawn) (the 2020 Planning Applications) | PEA (ref. WIE15582-102-R-1-2-3-PEA) - comprising an ecological data search, 'Extended' Phase 1 Habitat Survey, a search for common invasive floral species, and a PRA (ground based and external only) of buildings and trees. | PEA components undertaken in July 2019 with reporting finalised in May 2020. |
| | PSR (ref. WIE15582-102-R-2-3-1-PSR) - comprising a PRA of the northern boundary wall (external and endoscope inspection of), evening emergence and pre-dawn re-entry bat surveys at buildings and trees, bat activity and automated surveys. | PSR components undertaken between July 2019 to September 2019 with reporting finalised in May 2020. |
| LBRuT – ref 22/0900/OUT and 22/0902/FUL (the 2022 Planning Applications) | PEA (ref. WIE18671-103-R-1-2-4-PEA) - comprising an ecological data search, 'Extended' Phase 1 Habitat Survey (recorded to the UK Habitat Classification (UK Hab)) system, a search for common invasive floral species, and a PRA (ground based and external only) of buildings and trees. | PEA components undertaken in August and September 2021 with reporting finalised in February 2022. |
| | PSR (ref WIE18671-103-R-4-2-3-PSR) – comprising a PRA of the northern boundary wall (external and endoscope inspection of), evening emergence and pre-dawn re-entry bat surveys at buildings and trees, bat activity and automated surveys. | PSR components undertaken in October 2021* with reporting finalised in February 2022. |

**Due to the programme of the proposed planning application (following the refusal decision at the Greater London Authority (GLA) hearing in July 2021) only a reduced level of further ecological surveys for bats (based on the results of the PEA) could be undertaken at the Site in the remaining survey period in 2021.*

Aims of this Assessment

- 1.13. The aims of this PSR are based on the findings of both the PEA and the PSR undertaken to accompany the planning applications at the Site in 2021 (**Table 1**).
- 1.14. With regards to the area of the Site where the proposed Development is to be undertaken, the PEA undertaken in 2021 assessed building 9 (the Maltings) to be a historical bat roost site, buildings 10/11 and the northern boundary wall to have moderate potential to support roosting bats, buildings 12 and 14 to have low potential to support roosting bats and buildings 6 and 15 and to have negligible potential to support roosting bats. The surveys that accompanied the PSR in 2021 did not record any roosting bats at the buildings detailed above, however, during the bat surveys a single peregrine falcon was incidentally observed on Site (single bird recorded to be calling from building 3 during the daytime on the 4th October 2021 and before sunset a single peregrine falcon was recorded roosting at building 9 (the Maltings)).

- 1.15. Due to the constraints of the PSR in 2021 (with the bat surveys having to be undertaken October 2021, outside of the optimal survey period), and with respect to the potential significant impacts (direct and/or indirect) from the proposed Development this PSR aims to;
- Present the findings of update bat and peregrine falcon surveys and outline any resulting constraints to the proposed Development; and
 - Present any required mitigation, compensation and enhancement measures in line with the Mitigation Hierarchy¹ and with due regards to planning policy and legislative requirements (**Appendix A**).

¹ BS 42020:2013 Clause 5.2

2. Methodology

Bat Surveys

Northern boundary wall Inspection

- 2.1. An inspection of the northern boundary wall (Site side) assessed to have moderate potential to support roosting bats (as a result of the PEA undertaken in 2021) within and directly adjacent to the area proposed to be used for external filming as part of the proposed Development (**Figure 2**) was undertaken on 11th and 26th July 2022.
- 2.2. The inspection was undertaken at each PRF recorded. The inspection was undertaken with the use of a digital video endoscope (Ridgid Seesnake inspection camera), inspection mirrors, binoculars, high-powered torch and a ladder when required to inspect PRFs at height. The inspection searched for evidence of bat use (such as droppings, scratch marks, staining and sightings) as well as bats themselves, and on both occasions were led by Lee Mantle MCIEEM (CV provided in **Appendix B**) who is a Natural England Class Level 2 Bat Licence holder (2015-11736-CLS-CLS).

Evening Emergence and/or Pre-Dawn Re-entry Surveys

- 2.3. Evening emergence and/or pre-dawn re-entry surveys of buildings assessed to have the potential to support roosting bats (as a result of the PEA undertaken in 2021) and that have the potential to be significantly impacted (direct and/or indirect) by the proposed Development were undertaken at:
 - Building 10/11 (denoted to be a single building) determined as having moderate potential to support roosting bats; and
 - Buildings 12 and 14 determined as having low potential to support roosting bats;
- 2.4. The evening emergence and/or pre-dawn re-entry surveys were undertaken based on current best practice guidelines². In addition, a sufficient number of surveyors were used during each survey to ensure all of the PRFs were covered. The surveys were either led by Lee Mantle a Natural England Class Level 2 Bat Licence holder or an experienced bat surveyor. The positions of the surveyors during each survey are presented on **Figure 3**.
- 2.5. The surveys were undertaken using full spectrum Elekon Batlogger M bat detectors (with integrated digital recording and GPS) and Pettersson D240x bat detectors (with Roland Edirol recording device). This survey equipment is considered suitable for detecting all resident species of UK bats.
- 2.6. The surveys were undertaken in appropriate weather conditions and within the optimal survey period for these types of surveys. The evening emergence surveys commenced approximately 15 minutes prior to sunset and continued for at least an hour and a half thereafter. The pre-dawn re-entry surveys commenced at least an hour and a half before dawn and then 15 minutes thereafter. **Table 2** below provides a summary of the bat survey parameters.

² Collins, J. (ed) (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn). The Bat Conservation Trust, London. ISBN-13 978-1-872745-96-1

Table 2: Evening Emergence and Pre-Dawn Re-Entry Bat Survey Parameters

| Survey | Date | Sunset / Sunrise Time | Time Start / End (GMT+1) | Wind (Beaufort) | Cloud Cover (Oktas) | Temp Start / End (°C) |
|----------------------------|------------|-----------------------|--------------------------|-----------------|---------------------|-----------------------|
| Evening emergence (B14) | 20/06/2022 | 21.21 | 20:51 / 23:21 | 1 | 1/8 | 21 / 16 |
| Pre-dawn re-entry (B12) | 21/06/2022 | 04:43 | 03:15 / 05:00 | 2 | 2/8 | 14 / 12 |
| Evening emergence (B10/11) | 27/06/2022 | 21.23 | 21:00 / 23:00 | 2 | 8/8 | 19 / 17 |
| Evening emergence (B10/11) | 11/07/2022 | 21.15 | 20:45 / 23:15 | 1-2 | 3/8 | 28 / 25 |
| Evening emergence (B10/11) | 02/08/2022 | 20.49 | 20:29 / 22:49 | 2 | 1 | 22 / 20 |

Data Analysis

- 2.7. The sound recordings for the evening emergence and/or pre-dawn re-entry bat surveys were analysed using BatExplorer software. Identification of bat calls was undertaken using the parameters set out by Russ (2012)³.

Peregrine Falcon and Breeding Bird Surveys

- 2.8. A series of three peregrine falcon and breeding bird surveys were undertaken over the Site between June and July 2022. The surveys were undertaken by Bill Haines MCIEEM and predominantly undertaken at the buildings on Site to determine if peregrine falcon were still present given the incidental observation of a single bird calling from building 3 during the daytime on the 4th October 2021 and later that day at sunset, the observation of a single bird roosting at building 9 (the Maltings). The surveys were however also undertaken to record any breeding species on and adjacent to the Site. Due to the size of the Site three survey visits were considered to be suitable to give an overall picture of the use of the Site by breeding birds.
- 2.9. As part of the surveys a map was produced for each survey visit (**Figures 4.5 and 6**) showing the locations of all birds seen and the numbers of individuals for each survey visit. Birds seen overflying the Site but not interacting with it were not recorded.
- 2.10. The surveys were carried out in the late morning and/or afternoons and lasted approximately 2 to 3 hours in suitable weather conditions (i.e. not in heavy rain, poor visibility or wind greater than Beaufort 4). The parameters of the three breeding bird surveys are detailed in **Table 3**.

³ Russ, J., 2012. British bat calls: a guide to species identification. Pelagic publishing

Table 3: Peregrine Falcon and Breeding Bird Survey Parameters

| Visit No. | Date | Site Arrival and Leaving Time | Cloud Cover (Oktas) | Wind | | Precipitation | Temp. | Visibility |
|-----------|------------|-------------------------------|---------------------|------------|------|-------------------|-------|------------|
| | | | | (Beaufort) | (°C) | | | |
| 1 | 10/06/2022 | 11:00 / 14:45 | 6/8 | 2 | | 0 | 21 | Good |
| 2 | 24/06/2022 | 13:25 / 15:50 | 7-8 | 3-4 | | Short rain shower | 21 | Good |
| 3 | 12/07/2022 | 13.00 / 15.20 | 7/8 | 1-2 | | 0 | 29 | Good |

Consultation

- 2.11. To determine the level and scope of the update protected species surveys to accompany the temporary use filming application (application ref: 22/1860/FUL) which received planning permission in January 2023, e-mail consultation was issued to LBRuT on 26th May 2022. Following this e-mail, a response was provided by LBRuT detailing that the approach outlined was satisfactory, however, it would be expected that additional thermal imagery and drone surveys would be required at building 9 (the Maltings). Due to this comment additional e-mail consultation was issued to LBRuT on the 6th July 2022 and followed by a meeting the next day. As a result of the additional e-mail consultation and the meeting the need for the additional thermal imagery and drone surveys was removed given the proposed Development would have no direct or indirect impacts to building 9 (the Maltings). It was detailed that no internal filming is proposed at building B9 (the Maltings) and no lighting of this building would be required.
- 2.12. All consultation e-mails and responses with LBRuT are provided in **Appendix C**. Given the results of the protected species surveys are still valid, the conclusions of this consultation are applicable to the permanent use now proposed.

Constraints and Limitations

- 2.13. During the evening emergence survey at building 10/11 on the 27th June 2022 no access was possible to the Site side of the building. Instead, the survey was undertaken from the adjacent road and from vantage points through the locked gate adjacent to the security building. As a result of this constraint an additional evening emergence survey was undertaken on the 2nd August 2022 at the PRFs not covered by the survey on the 27th June 2022.
- 2.14. An inspection of the northern boundary wall was only undertaken at the Site side. As no direct impacts would result to the northern boundary wall and only indirect impacts assessed to be restricted to external lighting only, it was conceived that undertaking an inspection on the River Thames side of the northern boundary wall was not required.
- 2.15. As part of the peregrine falcon and breeding bird surveys internal access was restricted at buildings 2, 3, 4, 5, 7, 8, 9 (the Maltings), 13, 17 and 18 as the buildings has been boarded up due to structural integrity concerns. Instead, vantage points were sought during the surveys to record bird behaviour.

- 2.16. It should be noted that the building numbering referred to in this report has now been amended to align with system used for this planning application (**Figure 2**). This system therefore supersedes the numbering system used in the historical ecological assessments referenced in **Table 1**.
- 2.17. All other contractors, designers and the client should be aware of the following:
- The design recommendations within this report are assessed to be the most effective ecological solution at this stage of the project;
 - No other pre-construction information has been provided, obtained or referred to during the preparation of this report (including, but not limited to, services information, geotechnical reports and ordnance reports);
 - In deciding whether and how to progress with this project, it will be incumbent upon the client, designers and contractors to obtain and refer to relevant pre-construction and maintenance information, as required by the Construction (Design and Management) Regulations, 2015 to ensure compliance;
 - Waterman can assist with the development and co-ordination of this design to support effective risk management on this project upon request.



3. Results


Bat Surveys


Northern boundary wall Inspection

- 3.1. The results of the northern boundary wall inspection (Site side) are detailed in **Table 4** below. The table details each Potential Roosting Feature (PRF) recorded. As a result of the inspections no roosting bats or signs of roosting bats were recorded.

Table 4: Results of Northern boundary wall Inspection

| Potential Roosting Feature | Photographs | Northern boundary wall Inspection Results |
|----------------------------|---|--|
| <u>PRF 1</u> |  | <p>Features present on the Site side of the wall. This section of the wall has areas of paint which are peeling, that may offer temporary sheltering opportunities for roosting bats.</p> <p>No roosting bats or signs of roosting bats were recorded during the inspections on both the 11th and 26th July 2022.</p> |
| <u>PRF 2</u> |  | <p>Features present on the Site side of the wall. An open gap is present between steel supports and the wall with 14 of these features present in close succession.</p> <p>The majority of the supports are flush with the wall or with a wide gap present, however several have a 1-3cm gap present along the length of the support.</p> <p>No roosting bats or signs of roosting bats were recorded during the inspection on both the 11th and 26th July 2022.</p> |

| Potential Roosting Feature | Photographs | Northern boundary wall Inspection Results |
|----------------------------|---|--|
| <p><u>PRF 3</u></p> |  <p>The first photograph shows an exterior view of a red brick wall with a small, dark, rectangular opening. A blue pipe runs horizontally across the wall above the opening. There is some green foliage on the left side of the wall. The ground in front of the wall is paved and has some litter, including a black bag and some plastic. The second photograph is a close-up view of the opening, showing the interior of the cavity. The walls of the cavity are made of light-colored bricks, and there is a wooden beam or structure on the left side of the opening.</p> | <p>Feature present on the Site side of the wall with three of these features present in close succession. Four of these features were present on Site historically however one has been repaired due to unauthorised attempts to access the Site from the tow path adjacent to the River Thames.</p> <p>The features are bricked up on the River Thames side with some crevices allowing light penetration, with various heights of bricking up on the Site side, creating cavities between approximately 0-80cm high.</p> <p>No roosting bats or signs of roosting bats were recorded during the inspection on both the 11th and 26th July 2022</p> |

| Potential Roosting Feature | Photographs | Northern boundary wall Inspection Results |
|----------------------------|--|---|
| <p><u>PRF 4</u></p> |  | <p>Features present on the Site side of the wall with stress fracture creating crevices between the brickwork and exposed hole where it is assumed old pipework was present.</p> <p>The stress fracture commencing 1.5m above ground level to a height of 3.5m. A crevices are present between 1.5 to 3cm wide, 6cm in height (height of the brick) and protrudes back 8cm.. Thick spider webs present in the majority of crevices.</p> <p>Pipehole is present 2m above ground level, 9cm in diameter and protrudes back 20cm. Debris, a moth and snails were recorded to be present.</p> <p>No roosting bats or signs of roosting bats were recorded during the inspection on both the 11th and 26th July 2022</p> |

Evening Emergence and Pre-Dawn Re-entry Surveys

- 3.2. The following results section should be read in conjunction with the bat surveyor positions detailed on **Figure 3**. In summary, no bats were observed emerging from or entering buildings 10/11, 12 or 14. However, foraging and commuting activity by common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus*, noctule *Nyctalus noctula* and serotine *Eptesicus serotinus* were recorded during the surveys, as detailed within **Table 5** below.

Table 5: Results of Evening Emergence and Pre-Dawn Re-Entry Bat Surveys

| Building Number | Survey Type / Date | Survey Results |
|----------------------------|--------------------|--|
| Evening emergence (14) | 20/06/2022 | Foraging and commuting activity from common pipistrelle (18 recordings), soprano pipistrelle (4 recordings) and noctule (20 recordings) bats starting 30 minutes after sunset with one common pipistrelle seen foraging south to north-west around the buildings edge. |
| Pre-dawn re-entry (12) | 21/06/2022 | Foraging and commuting activity from common pipistrelle (48 recordings), soprano pipistrelle (8 recordings) and noctule bats (11 recordings). Mainly common pipistrelle were recorded, with this species seen commuting around the western edge of the building on four occasions during the survey. |
| Evening emergence (B10/11) | 27/06/2022 | Foraging and commuting activity from common pipistrelle (27 recordings), soprano pipistrelle (16 recordings) noctule (2 recordings) and serotine (2 recordings) bats. Three common pipistrelle were seen foraging in the courtyard and towards the chimney, and one soprano pipistrelle was seen foraging in the courtyard. Serotine was first recorded on Site two hours after sunset. |
| Evening emergence (B10/11) | 11/07/2022 | Foraging and commuting activity from common pipistrelle, soprano pipistrelle, and noctule bats. Mostly common pipistrelle and soprano pipistrelle were recorded with common pipistrelle seen foraging by a tree adjacent to the building, and a number of other common pipistrelle seen commuting throughout the survey. The first bat recorded on Site was a noctule 15 minutes after sunset. |
| Evening emergence (B10/11) | 02/08/2022 | Foraging and commuting activity from soprano pipistrelle only. Activity was heard away from the building. The first bat recorded on site was 53 minutes after sunset. |

Peregrine Falcon and Breeding Bird Surveys

- 3.3. The following results section should be read in conjunction with **Figure 4, 5 and 6**. In summary a total of 12 bird species were seen either on or immediately adjacent to the Site. Birds seen overflying the Site but not interacting with it were not recorded.
- 3.4. No peregrine falcon *Falco peregrinus* were recorded on any of the three visits. It is thought that the incidental recording of the peregrine in October 2021 was a single occurrence. This is supported by the consultation previously undertaken with the London Peregrine Partnership (LPP) on the 28th September 2021 regarding the presence of peregrine falcons at the vicinity of the Site. As part of this consultation LPP stated that no known records of breeding pairs are in the local area either recent or historical.
- 3.5. Feral pigeon *Columba livia* was the only species proven to be breeding on Site as confirmed within building 3. In addition, feral pigeon nesting was confirmed at building 6, 8, 9 and 17 and other

activity (perching flying in/out etc) confirmed at buildings 3, 4, 5, 12 and 13. Grey wagtail were recorded signing and lesser black backed gull perching on/from the roof of building 12. The results of the building inspections undertaken during Site visits 1 to 3 are detailed in **Appendix D, E and F.**

- 3.6. A list of the species recorded and their likely breeding status is detailed in **Table 6.** This table also details each species recorded on each survey visit along with their notable status.

Table 6: Results of Peregrine Falcon and Breeding Bird Surveys

| Bird Species | Species Code | Notable Status | Likely Breeding Status | Number of Birds Recorded Per Visit | Total Number of Birds Recorded |
|---|--------------|----------------|------------------------|---|--------------------------------|
| Lesser black-backed gull <i>Larus fuscus</i> | LB | Amber | Possible breeding | Visit 1 (10 June 2022) - 2 Visit 2 (14 June 2022) - 6 Visit 3 (12 July 2022) - 2 | 10 |
| Feral pigeon <i>Columba livia</i> | FP | N/A | Confirmed breeding | Visit 1 (10 June 2022) - 50 Visit 2 (14 June 2022) - 22 Visit 3 (12 July 2022) - 28 | 100 |
| Wood pigeon <i>Columba palumbus</i> | WP | Amber | Probable Breeding | Visit 1 (10 June 2022) - 2 Visit 2 (14 June 2022) - N/A Visit 3 (12 July 2022) - 2 | 4 |
| Magpie <i>Pica pica</i> | MG | N/A | Possible breeding | Visit 1 (10 June 2022) - 2 Visit 2 (14 June 2022) - 1 Visit 3 (12 July 2022) - N/A | 3 |
| Carrion crow <i>Corvus corone</i> | C. | N/A | Possible breeding | Visit 1 (10 June 2022) - 2 Visit 2 (14 June 2022) - 1 Visit 3 (12 July 2022) - 4 | 7 |
| Wren <i>Troglodytes troglodytes</i> | WR | Amber | Possible breeding | Visit 1 (10 June 2022) - N/A Visit 2 (14 June 2022) - N/A | 1 |

| Bird Species | Species Code | Notable Status | Likely Breeding Status | Number of Birds Recorded Per Visit | Total Number of Birds Recorded |
|---|--------------|---------------------------|------------------------|--|--------------------------------|
| | | | | Visit 3 (12 July 2022) - 1 | |
| Starling <i>Sturnus vulgaris</i> | SG | Red and S41 NERC Act 2006 | Probable breeding | Visit 1 (10 June 2022) - N/A Visit 2 (14 June 2022) - N/A Visit 3 (12 July 2022) - 20 | 20 |
| Robin <i>Erithacus rubecula</i> | R. | N/A | Possible breeding | Visit 1 (10 June 2022) - 1 Visit 2 (14 June 2022) - N/A Visit 3 (12 July 2022) - N/A | 1 |
| House sparrow <i>Passer domesticus</i> | HS | Red and S41 NERC Act 2006 | Probable breeding | Visit 1 (10 June 2022) - N/A Visit 2 (14 June 2022) - 1 Visit 3 (12 July 2022) - N/A | 1 |
| Grey wagtail <i>Motacilla cinerea</i> | GL | Amber | Probable breeding | Visit 1 (10 June 2022) - 1 Visit 2 (14 June 2022) - 1 Visit 3 (12 July 2022) - N/A | 2 |
| Pied wagtail <i>Motacilla alba</i> | PW | N/A | Possible breeding | Visit 1 (10 June 2022) - 1 Visit 2 (14 June 2022) - 1 Visit 3 (12 July 2022) - N/A | 2 |
| Goldfinch <i>Carduelis carduelis</i> | GO | N/A | Possible breeding | Visit 1 (10 June 2022) - N/A Visit 2 (14 June 2022) - 1 Visit 3 (12 July 2022) - 1 | 2 |

4. Discussion and Recommendations

Bats

- 4.1. As a result of the updated northern boundary wall inspections and evening emergence and pre-dawn re-entry surveys at buildings 10/11, 12 and 14 roosting bats are assessed to be likely absent from these structures and direct impacts as part of the proposed Development can reasonably be ruled out.
- 4.2. There will be a requirement for some minimal lighting of the external film sets, as well as minimal lighting for safety purposes for vehicular and pedestrian routes. At present, the exact specification and details of the set lighting (including exact location and heights) are unknown. However, at this stage, it can be committed that:
 - Any lighting would be directional on to the sets only, and would avoid upwards light spill;
 - No lighting rigs would be used;
 - There would be no lighting of semi-natural habitats such as trees;
 - There would be no lighting of the Maltings Building (Building 9); and
 - No lighting of the sets would occur other than within the hours of operation of the Site (i.e. 6am-9pm Monday to Friday and 8am-4pm Saturday and Sunday), unless otherwise agreed in writing with the local planning authority.
- 4.3. These commitments should minimise up-lighting that could indirectly impact foraging and commuting bats on/above the Site and those utilising the River Thames (where up-lighting has the potential to spill over the northern boundary wall that is circa 4-5m in height). In addition, such commitments will avoid any spill to the southern boundary wall to the east of building 10/11 as two roost sites (single pipistrelle recorded to re-entering during a pre-dawn re-entry survey on 3rd August 2022) have been recently recorded as part of survey to accompany the 202 Planning Applications.
- 4.4. Although no roosting bats have been recorded at buildings 10/11, 12 and 14, the proposed Development will not result in the removal of any buildings or vegetation ecological enhancement measures will still be provided for bats (as detailed in **Appendix C**) in line with the NPPF, London Planning Policy and Local Planning Policy LP 15 '*Biodiversity*' at the adjacent Mortlake Green (local public greenspace) as detailed in paragraph 4.7.

Peregrine Falcon and Breeding Birds

- 4.5. As a result of the peregrine falcon and breeding bird surveys undertaken at the Site, peregrine falcons are likely to be absent, however breeding feral pigeons have been confirmed at building 3. In addition, feral pigeon nesting was confirmed at building 6, 8, 9 and 17 and other activity (perching flying in/out etc) confirmed at buildings 3, 4, 5, 12 and 13. Grey wagtail were recorded signing and lesser black backed gull perching on/from the roof of building 12.
- 4.6. All of these buildings will not be subject to internal film production operations and ancillary activities, apart from building 12. At building 12, although no breeding or nesting birds were recorded, but given the grey wagtail, lesser black backed gull and feral pigeon (single bird recorded to be flying out of the east side of the building) activity witnessed, as a precautionary measure the

Applicant has committed to an Ecology Clerk of Works (ECoW) undertaking a final nesting/breeding bird inspection at building 12 prior to the proposed Development works commencing. The inspection will be undertaken to ensure that no birds have started to breed/nest at the building that could be directly impacted from activity that could cause the intentional killing or injury to/of the bird or destruction of its nest whilst in use (as fully detailed in **Appendix A**)

- 4.7. Although breeding/nesting birds have not been recorded at buildings 10/11, 12 and 14, the proposed will not result in the removal of any buildings or vegetation ecological enhancement measures will still be provided for birds (as detailed in **Appendix C**) in line with the NPPF, London Planning Policy and Local Planning Policy LP 15 'Biodiversity' at the adjacent Mortlake Green (local public greenspace) as detailed in paragraph 4.7.

Ecological Enhancement

- 4.8. Ecological enhancement measures at the adjacent Mortlake Green (local public greenspace), would have already been provided as part of the now consented Temporary Filming application (Ref 22/1860/FUL) that covers the same Site area. The measures included the provision of 5 bird and 5 bats boxes along with the creation of 3 stag beetle loggeries.
- 4.9. The requirement for a design stage biodiversity net gain (BNG) assessment to accompany the application for the proposed Development is to be confirmed with LBRuT. It should be noted however that no design stage BNG assessment was required by LBRuT to accompany the now consented Temporary Filming application (Ref 22/1860/FUL).

5. Conclusions

- 5.1. No roosting bats, breeding or nesting birds have been recorded at buildings 10/11, 12, 14 and 15 that could be directly impacted on as part of the proposed Development.
- 5.2. To prevent any significant indirect impacts set of commitments pertaining to the proposed lighting have been made in order to prevent any lighting/spill on building 9 (the Maltings) and to ensure no up-lighting is permitted. In addition, and as a precautionary measure the Applicant has committed to an ECoW undertaking a final inspection of building 12 prior to the proposed Development works commencing at this building to ensure no birds have started to breed/nest at the buildings.
- 5.3. Ecological enhancement measures have already been provided as part of the now consented Temporary Filming application (Ref 22/1860/FUL) that covers the same Site area.
- 5.4. In line with guidance from the Chartered Institute of Ecology and Environmental Management (CIEEM), should there be a period of greater than 18 months since the time of the surveys detailed within this report were undertaken and the commencement of the proposed Development, further update surveys could be required in agreement with LBRuT.

FIGURES

Figure 1: Site Location Plan

Figure 2: Proposed Development

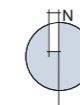
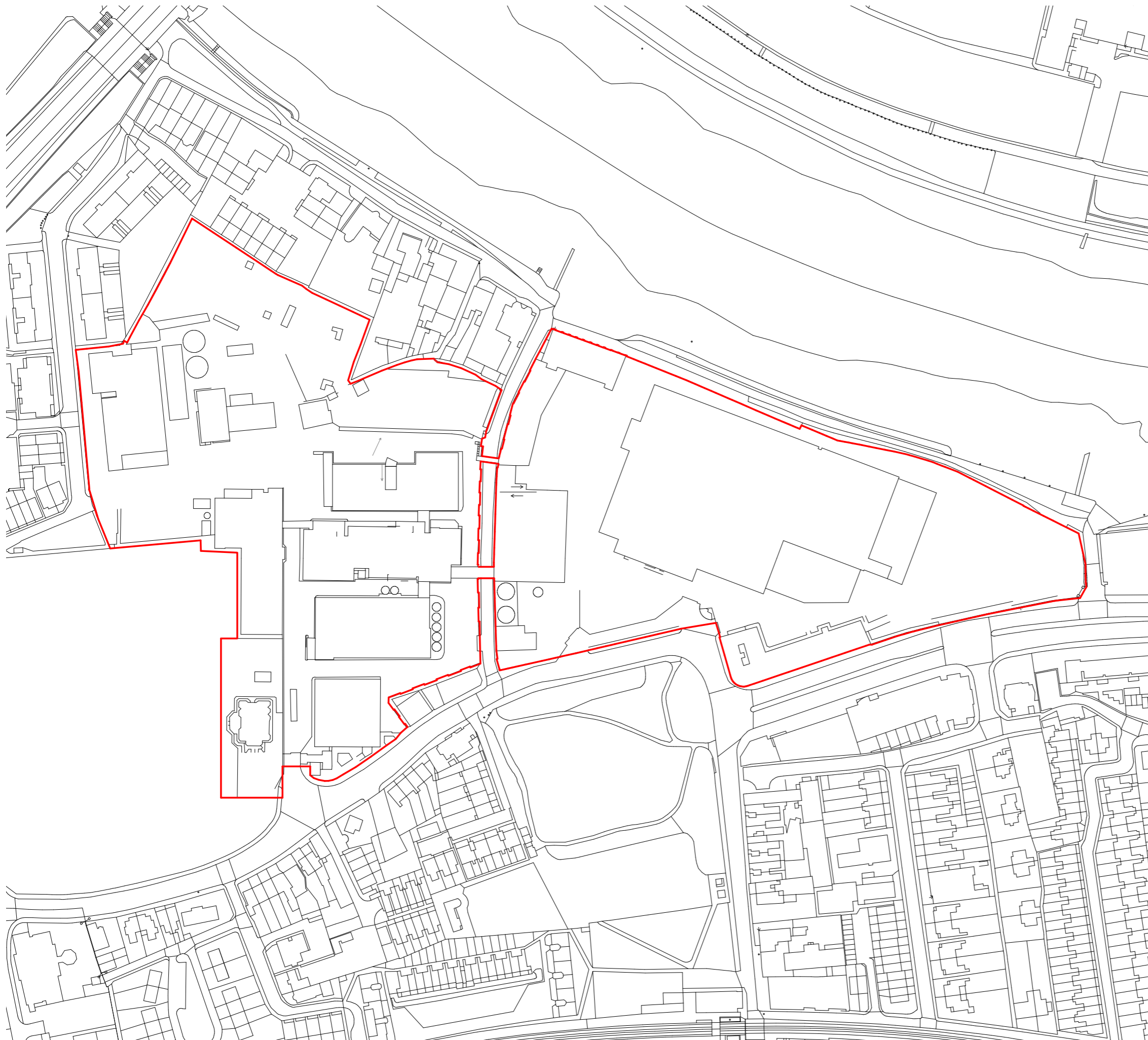
Figure 3: Evening Emergence and/or Pre-Dawn Re-Entry Bat Surveyor Locations

Figure 4: Peregrine Falcon and Breeding Bird Survey Map – 10th June 2022

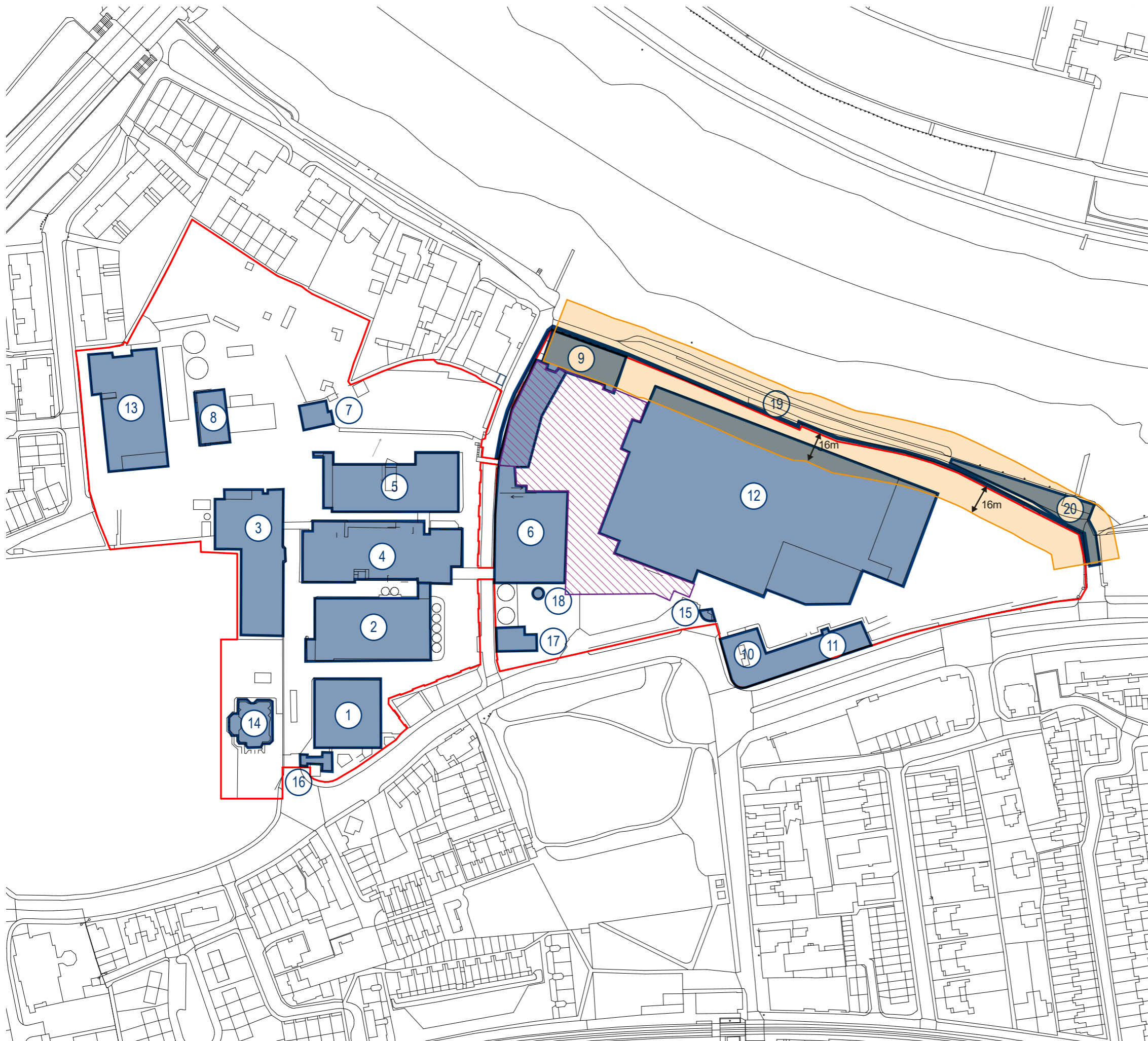
Figure 5: Peregrine Falcon and Breeding Bird Survey Map – 24th June 2022

Figure 6: Peregrine Falcon and Breeding Bird Survey Map – 12th July 2022

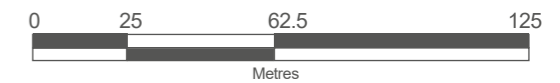
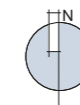
 Site Boundary



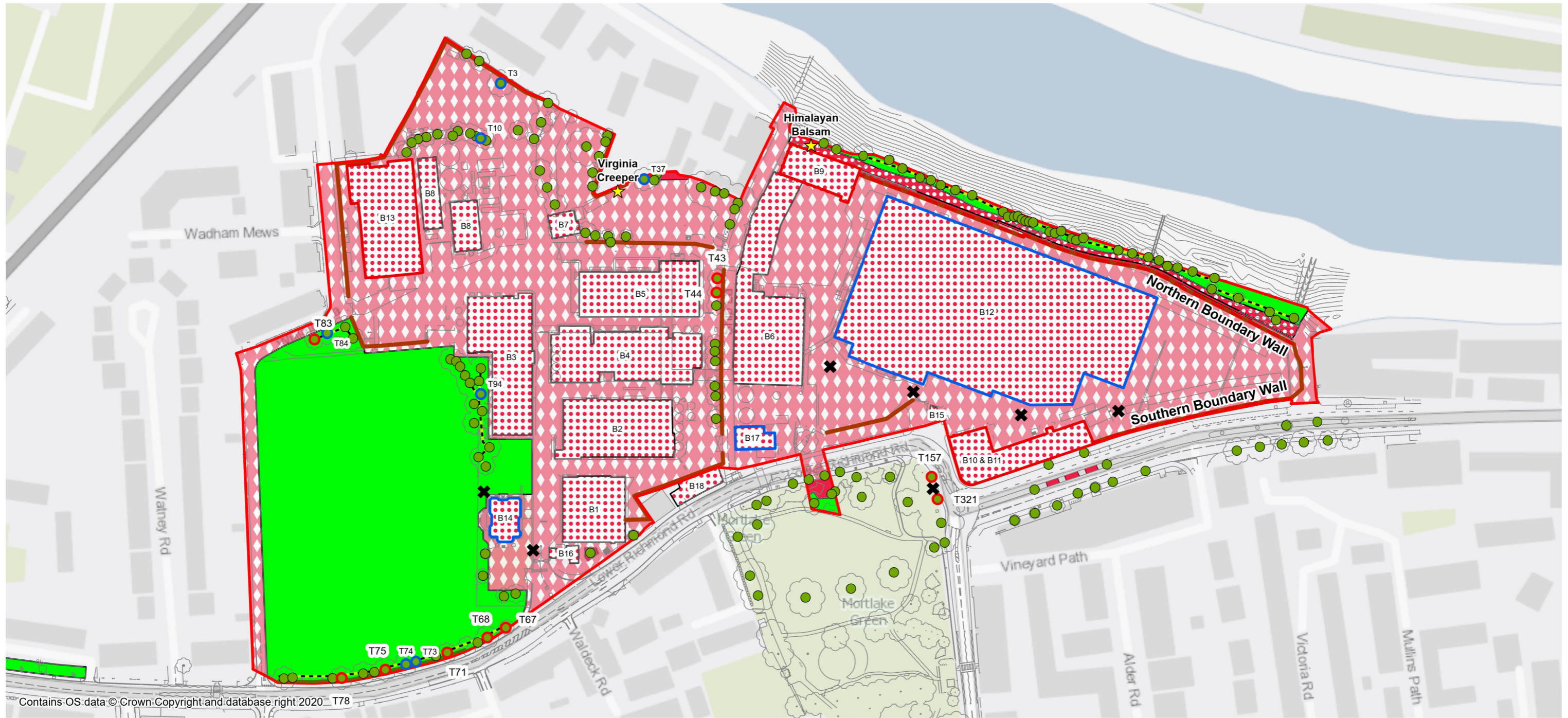
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|-----------------|---|
| Project Details | WIE18671-116: Stag Brewery Permanent Filming Use Application |
| Figure Title | Figure 1: Site Location Plan |
| Figure Ref | WIE18671-116_GR_PSR_1A |
| Date | February 2023 |
| File Location | \\s-incs\wie\projects\wie18671\100\graphics\19\issued figures |



- | | |
|---|---|
| Site Boundary | External Filming Use Area |
| 16m Exclusion Zone from Tidal Flood Defence | Former Bottling Hall |
| P.O.B | Packaging |
| Brewhouse | Stable Court |
| Process Building | Sports Club |
| Chip Cellar | East Gatehouse |
| Finishing Cellar | West Gatehouse |
| Power House | CO2 Block |
| Powder Store | Chimney Stack |
| Effluent Treatment | Flood Defence Wall |
| Maltings | Railway Tracks, Granite Paving and River Moorings |
| Former Hotel | |

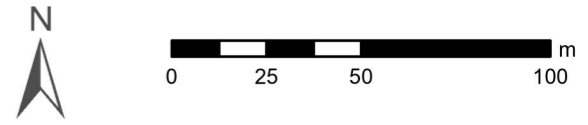


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|------------------------|---|
| Project Details | WIE18671-116: Stag Brewery Permanent Filming Use Application |
| Figure Title | Figure 2: Existing Buildings and Structures on the Site |
| Figure Ref | WIE18671-116_GR_PSR_2A |
| Date | February 2023 |
| File Location | \\s-inc\wiel\projects\wie18671\100\graphics\19\issued figures |



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- | | | |
|--|---|---------------------------------------|
| Planning Application Boundary | Wall - u1e - 68, 80 | Buildings with Low Bat Potential |
| Modified Grassland - g4 - 64, 66, 75, 76 | Hedgerow - h2b - 17, 48, 1160 | Buildings with Moderate Bat Potential |
| Ornamental Planting - u - 48, 80, 1160 | Line of Trees - w1g6, 76 | Features with Moderate Bat Potential |
| Artificial Unvegetated Unsealed Surface - u1c - 17, 80 | Urban Tree - u - 1170 | Invasive Species |
| Buildings - u1b5 - 97 | Trees with Low Bat Roost Potential | Surveyor Locations |
| Hardstanding - u1b6 - 111 | Trees with Moderate Bat Roost Potential | |

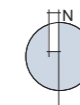


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| Project Details | WIE18671-116: Stag Brewery Permanent Filming Use Application |
| Figure Title | Figure 3: Habitat Features (UK Habs) |
| Figure Ref | WIE18671-116-GIS-PSR-3A |
| Date | February 2023 |
| File Location | \\s-incs\wiel\projects\wie18671\116\gis\psr |
| | www.watermangroup.com |



- ◆ Displaying
- Calling
- ★ Singing
- Visual
- ✦ Nest
- Flying Around
- ▭ Site Boundary
- © Google Satellite

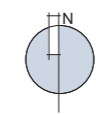
Stag Brewery - Visit 1
10/06/2022



| | |
|-----------------|--|
| Project Details | WIE18671-116: Stag Brewery Permanent Filming Use Application |
| Figure Title | Figure 4: Peregrine Falcon and Breeding Bird Survey Map – 10th June 2022 |
| Figure Ref | WIE18671-116_GR_PSR_4A |
| Date | February 2023 |
| File Location | \\s-inc\wiel\projects\wie18671\100\graphics\19\issued figures |



Stag Brewery - Visit 2
24/06/2022

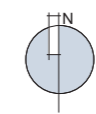


| | |
|-----------------|--|
| Project Details | WIE18671-116: Stag Brewery Permanent Filming Use Application |
| Figure Title | Figure 5: Peregrine Falcon and Breeding Bird Survey Map – 24th June 2022 |
| Figure Ref | WIE18671-116_GR_PSR_5A |
| Date | February 2023 |
| File Location | \\s-inc\wie\projects\wie18671\100\graphics\19\issued figures |



- ↓ Flying S
- Calling
- ★ Singing
- Visual
- Flying Around
- ▭ Site Boundary
- © Google Satellite

Stag Brewery - Visit 3
12/07/2022



| | |
|-----------------|--|
| Project Details | WIE18671-116: Stag Brewery Permanent Filming Use Application |
| Figure Title | Figure 6: Peregrine Falcon and Breeding Bird Survey Map – 12th July 2022 |
| Figure Ref | WIE18671-116_GR_PSR_6A |
| Date | February 2023 |
| File Location | \\s-inc\wiel\projects\wie18671\113\graphics\19\issued figures |

APPENDICES

Appendices

A. Summarised Planning Policy and Legislation

National Planning Policy

National Planning Policy Framework, 2021

The National Planning Policy Framework (NPPF) was published in 2012 and last updated on 20th July 2021⁶. Section 15 (outlined below) of the NPPF, 'Conserving and Enhancing the Natural Environment', replaces Section 11 of the previous NPPF 2012 revision and NPPF 2018⁷. No significant changes to Section 15 are noted between the 2019⁸ and 2021 update. The Government Circular 06/2005⁹ - Biodiversity and Geological Conservation: Statutory Obligations and Their Impact within the Planning System, remains valid and is still referenced within the NPPF.

Of particular significance with respect to biodiversity in the NPPF revision, is the amendment to para 175(d) of the NPPF 2019 (now para 180(d) of the NPPF 2021), which now requires opportunities to incorporate biodiversity improvements in and around development, rather than simply making it optional. This demonstrates further steps taken by the government towards achieving the 25 Year Environment Plan (2018). Otherwise there have been no further changes to the wording of "Conserving and enhancing the natural environment" Chapter of the NPPF.

The NPPF encourages the planning system to contribute to and enhance the natural and local environment. This should be achieved by:

- *"Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- *maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- *minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
- *preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
- *Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate".*

The NPPF also stipulates that Local Planning Authorities (LPAs), when determining planning applications, should apply the following principles:

- *"If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*

⁶ Ministry of Housing, Communities and Local Government. (2021). *National Planning Policy Framework*.

⁷ Ministry of Housing, Communities and Local Government. (2018). *National Planning Policy Framework*.

⁸ Ministry of Housing, Communities and Local Government. (2019). *National Planning Policy Framework*

⁹ Department of Communities and Local Government. (2005). *Circular 06/05: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System*.

- *development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
- *development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*
- *development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.”*

National Planning Practice Guidance, 2021

The Government’s National Planning Practice Guidance 2016¹⁰, updated in 2019¹¹ (NPPG) is intended to provide guidance to local planning authorities and developers on the implementation of the planning policies set out within the NPPF. The guidance of most relevance to ecology and biodiversity is the Natural Environment Chapter, which explains key issues in implementing policy to protect biodiversity, including local requirements.

Regional Planning Policy

The London Plan: The Spatial Development Strategy for Greater London, 2021

The London Plan 2021 sets out the overall strategic plan, setting out a framework for development over the next 20 to 25 years and includes several policies relating to ecology. Key to the London Plan is Policy G6 ‘Biodiversity and Access to Nature’ which sets out the Mayor’s policy in relation to biodiversity and access to nature. This states:

“Sites of Importance for Nature Conservation (SINCs) should be protected.

Boroughs, in Developing Plans, should:

- a) use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks;*
- b) identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them;*
- c) support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans;*
- d) seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context; and*

¹⁰ Department for Communities and Local Government. (2016). *National Planning Practice Guidance*. DCLG, London.

¹¹ Department for Communities and Local Government. (2019). *National Planning Practice Guidance*. DCLG, London.

Appendices

- e) ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.

Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:

avoid damaging the significant ecological features of the site;

- f) *minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site; and*

- g) *deliver off-site compensation of better biodiversity value.*

Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

Proposals which reduce deficiencies in access to nature should be considered positively.

Mayor of London: Environment Strategy, 2018

The London Environment Strategy, 2018¹² compliments the London Plan. It sets out how London's biodiversity can be protected and enhanced and contains a list of Priority Habitats and Species within the city. Priority species (SAPs) and habitats (HAPs) related to the Site are listed below:

- Birds, house sparrow, and bats (SAPs)
- Rivers and Streams (HAPs).

The relevant policy within the strategy is Policy 5.2.1 'Protect a core network of nature conservation sites and ensure a net gain in biodiversity'.

Local Planning Policy

London Borough of Richmond upon Thames: Adopted Local Plan 2018 / 2020

The following strategic visions, objectives and policies within the final draft of the Local Plan are of relevance to biodiversity:

Strategic vision 'Natural Environment, Open Spaces and the Borough's Rivers' states:

"The outstanding natural environment and green infrastructure network, including the borough's parks and open spaces, biodiversity and habitats as well as the unique environment of the borough's rivers and their corridors will have been protected and enhanced where possible. Residents will continue to highly value and cherish the borough's exceptional environmental quality"

Strategic objective 'Protecting Local Character' states:

".....3) Protect and improve the borough's parks and open spaces to provide a high quality environment for local communities and provide a balance between areas for quiet enjoyment and wildlife and areas to be used for sports, games and recreation;

4) Protect and enhance the borough's network of green infrastructure that performs a wide range of functions for residents, visitors, biodiversity and the economy;

5) Protect and enhance the borough's biodiversity, including trees and landscape, both within open spaces but also within the built environment and along wildlife corridors; and

¹² Mayor of London (2018) *London Environment Strategy*

6) *Protect and improve the unique environment of the borough's rivers, especially the River Thames and its tributaries as wildlife corridors, as opportunities for recreation and river transport where possible, increasing access to and alongside the rivers where appropriate, and gain wider local community benefits when sites are redeveloped.*"

Policy LP 12 'Green Infrastructure' states:

"Green infrastructure is a network of multi-functional green spaces and natural elements, which provides multiple benefits for people, nature and the economy.

- A) *To ensure all development proposals protect, and where opportunities arise enhance, green infrastructure, the following will be taken into account when assessing development proposals:*
- the need to protect the integrity of the green spaces and assets that are part of the wider green infrastructure network; improvements and enhancements to the green infrastructure network are supported;*
 - its contribution to the wider green infrastructure network by delivering landscape enhancement, restoration or re-creation;*
 - incorporating green infrastructure features, which make a positive contribution to the wider green infrastructure network*
- B) *The hierarchy of open spaces, as set out in the table below (refer to original document), will be protected and used in accordance with the functions shown."*

Policy LP 13 'Green Belt, Metropolitan Open Land and Local Green Space' states

Local Green Space

D. Local Green Space, which has been demonstrated to be special to a local community and which holds a particular local significance, will be protected from inappropriate development that could cause harm to its qualities.

Policy LP 15 'Biodiversity' states:

"A) The Council will protect and enhance the borough's biodiversity, in particular, but not exclusively, the sites designated for their biodiversity and nature conservation value, including the connectivity between habitats. Weighted priority in terms of their importance will be afforded to protected species and priority species and habitats including National Nature Reserves, Sites of Special Scientific Interest (SSSI) and Other Sites of Nature Importance as set out in the Biodiversity Strategy for England, and the London and Richmond upon Thames Biodiversity Action Plans. This will be achieved by:

- 1) protecting biodiversity in, and adjacent to, the borough's designated sites for biodiversity and nature conservation importance (including buffer zones), as well as other existing habitats and features of biodiversity value;*
- 2) supporting enhancements to biodiversity;*
- 3) incorporating and creating new habitats or biodiversity features, including trees, into development sites and into the design of buildings themselves where appropriate; major developments are required to deliver net gain for biodiversity, through incorporation of ecological enhancements, wherever possible;*
- 4) ensuring new biodiversity features or habitats connect to the wider ecological and green*

infrastructure networks and complement surrounding habitats;

- 5) *enhancing wildlife corridors for the movement of species, including river corridors, where opportunities arise; and*
- 6) *maximising the provision of soft landscaping, including trees, shrubs and other vegetation that support the borough-wide Biodiversity Action Plan.*

B) Where development would impact on species or a habitat, especially where identified in the relevant Biodiversity Action Plan at London or local level, or the Biodiversity Strategy for England, the potential harm should:

- 1) *firstly be avoided (the applicant has to demonstrate that there is no alternative site with less harmful impacts);*
- 2) *secondly be adequately mitigated; or*
- 3) *as a last resort, appropriately compensated for.”*

LP 16 ‘Trees, Woodlands and Landscape’ states:

“A) The Council will require the protection of existing trees and the provision of new trees, shrubs and other vegetation of landscape significance that complement existing, or create new, high quality green areas, which deliver amenity and biodiversity benefits.

B) To ensure development protects, respects, contributes to and enhances trees and landscapes, the Council, when assessing development proposals, will:

Trees and Woodlands:

- 1) *resist the loss of trees, including aged or veteran trees, unless the tree is dead, dying or dangerous; or the tree is causing significant damage to adjacent structures; or the tree has little or no amenity value; or felling is for reasons of good arboricultural practice; resist development that would result in the loss or deterioration of irreplaceable habitat such as ancient woodland;*
- 2) *resist development which results in the damage or loss of trees that are considered to be of townscape or amenity value; the Council will require that site design or layout ensures a harmonious relationship between trees and their surroundings and will resist development which will be likely to result in pressure to significantly prune or remove trees;*
- 3) *require, where practicable, an appropriate replacement for any tree that is felled; a financial contribution to the provision for an off-site tree in line with the monetary value of the existing tree to be felled will be required in line with the ‘Capital Asset Value for Amenity Trees’ (CAVAT);*
- 4) *require new trees to be of a suitable species for the location in terms of height and root spread, taking account of space required for trees to mature; the use of native species is encouraged where appropriate;*
- 5) *require that trees are adequately protected throughout the course of development, in accordance with British Standard 5837 (Trees in relation to design, demolition and construction – Recommendations).*

The Council may serve Tree Preservation Orders or attach planning conditions to protect trees considered to be of value to the townscape and amenity and which are threatened by development.

Landscape:

- 1) require the retention of important existing landscape features where practicable;*
- 2) require landscape design and materials to be of high quality and compatible with the surrounding landscape and character; and*
- 3) encourage planting, including new trees, shrubs and other significant vegetation where appropriate.”*

Policy LP 17 ‘Green Roofs and Walls’ states:

“Green roofs and / or brown roofs should be incorporated into new major developments with roof plate areas of 100sqm or more where technically feasible and subject to considerations of visual impact. The aim should be to use at least 70% of any potential roof plate area as a green / brown roof.

The onus is on an applicant to provide evidence and justification if a green roof cannot be incorporated. The Council will expect a green wall to be incorporated, where appropriate, if it has been demonstrated that a green / brown roof is not feasible.

The use of green / brown roofs and green walls is encouraged and supported in smaller developments, renovations, conversions and extensions.”

Policy LP 18 ‘River Corridors’ states:

“A) The natural, historic and built environment of the River Thames corridor and the various water courses in the borough... will be protected. Development adjacent to the river corridors will be expected to contribute to improvements and enhancements to the river environment.

B) Development proposals within the Thames Policy Area should respect and take account of the special character of the reach as set out in the Thames Landscape Strategy and Thames Strategy as well as the Council's Conservation Area Statements, and where available Conservation Area Studies, and / or Management Plans.”

London Borough of Richmond upon Thames: Supplementary Planning Documents and Guidance

A series of Supplementary Planning Guidance (SPG) and Supplementary Planning Documents (SPDs) has been produced by LBRuT to provide greater detail on existing local planning policies to support decisions on planning applications. LBRuT no longer produces SPGs as they have been replaced with SPDs since 2004. However, they remain material considerations in planning decisions. With regards to biodiversity, a SPG titled ‘Nature Conservation and Development’¹³ has been published by LBRuT. This SPG states:

- i. “It is important that nature conservation should be integrated at the planning stage with all new development. Schemes should be designed to retain existing features and habitats of wildlife value on site, and to create new habitats where appropriate.”*

¹³ London Borough of Richmond upon Thames (no-date); ‘Design Guidelines for Nature Conservation & Development’.

Currently, the only parts of the UDP that remain saved and have not been superseded are those Proposal sites that were originally saved. The eastern part of the Site is allocated on the Proposals Map as site S4 (Budweiser Stag Brewery)¹⁴.

The LBRuT adopted a planning brief for the Site in July 2011 with SPD¹⁵ status. This document sets out opportunities and constraints regarding the redevelopment of the Site. With regard to biodiversity, this SPD states:

“Opportunities should be taken to enhance biodiversity throughout the site and particularly along the River.”

Site Allocations

LBRuT have also produced a suite of 14 Village Plan SPDs, one for each Village Area in the Borough. Each Village Plan SPD provides a vision for the area, identifying the local character and setting out key policies and design principles that will apply to both new development and changes to existing buildings. These are used as material considerations in determining planning applications in each area.

The Site is located within the ‘Mortlake Village Plan’¹⁶. It sets out that the vision for Mortlake is to create a new heart to the village by the redevelopment of the Stag Brewery Site creating a recreational and living quarter and a vibrant link between the village and the riverside.

Biodiversity Action Plans

UK Post-2010 Biodiversity Framework

The Environment Departments of all four governments in the UK work together through the Four Countries Biodiversity Group. Together they have agreed, and Ministers have signed, a framework of priorities for UK-level work for the Convention on Biological Diversity. Published on 17 July 2012, the ‘UK Post-2010 Biodiversity Framework’¹⁷ covers the period from 2011 to 2020. This now supersedes the UK Biodiversity Action Plan (UK BAP)¹⁸. However, many of the tools developed under UK BAP remain of use, for example, background information about the lists of priority habitats and species. The lists of priority species and habitats agreed under UK BAP still form the basis of much biodiversity work in the countries.

Although the UK Post-2010 Biodiversity Framework does not confer any statutory legal protection, in practice many of the species listed already receive statutory legal protection under UK and / or European legislation. In addition, the majority of Priority national (English) BAP habitats and species are now those listed as Habitats of Principal Importance (HoPI) and Species of Principal Importance (SoPI) in England listed under Section 41 (S41) of the NERC Act 2006. For the purpose of this report, habitats and species listed under S41 of the NERC Act are referred to as having superseded the UK BAP. All public bodies have a legal obligation or ‘biodiversity duty’ under Section 40 of the NERC Act 2006 to conserve biodiversity by having particular regard to those species and habitats listed under S41.

¹⁴ London Borough of Richmond upon Thames (2005); ‘Unitary Development Plan. Chapter 12 – Local Strategies and Plan Proposals’.

¹⁵ London Borough of Richmond upon Thames (2011); ‘Stag Brewery, Mortlake, SW14 Planning Brief. Supplementary Planning Guidance’.

¹⁶ London Borough of Richmond upon Thames (2015); ‘Mortlake Village Planning Guidance. Supplementary Planning Guidance’.

¹⁷ JNCC and DEFRA (on behalf of the Four Countries’ Biodiversity Group). (2012). UK Post-2010 Biodiversity Framework.

¹⁸ HMSO. (1994) Biodiversity The UK Action Plan.

Appendices

Based on the results of the PEA the following HoPIs and SoPIs listed under S41 are considered to be of potential value on and/or immediately adjacent to the Site:

- Rivers and Streams;
- Noctule bat (SoPI);
- Soprano pipistrelle bat *Pipistrellus pygmaeus* (SoPI);
- Starling *Sturnus vulgaris* (SoPI);
- House sparrow *Passer domesticus* (SoPI).

Richmond Biodiversity Action Plan

The Biodiversity Action Plan for the London Borough of Richmond upon Thames (LBRuT)¹⁹ sets out the framework for the protection, conservation and enhancement of wildlife within the borough. Through its implementation, the plan protects and manages habitats and species of national, regional or local significance, or those that are in the Red Data Books and on the Red Lists. Based on the results of the PEA the following Habitat and Species Action Plans are considered to be of relevance to the Site:

- Tidal Thames;
- House sparrow;
- Song thrush;
- Swift;
- Stag beetle.

Guidance

Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services

In October 2010, over 190 countries signed an historic global agreement in Nagoya, Japan to take urgent and effective action to halt the alarming global declines in biodiversity. This agreement recognised just how important it is to look after the natural world. It established a new global vision for biodiversity, including a set of strategic goals and targets to drive action. England's response to this agreement was the publication of '*Biodiversity 2020: A strategy for England's wildlife and ecosystem services*'²⁰. The mission for this strategy is:

"to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people."

BS 42020: 2013 Biodiversity: Code of Practice for Planning and Development

The UK commitment to halt overall loss of biodiversity by 2020 in line with the European Biodiversity Strategy and UN Aichi targets²¹, is passed down to local authorities to implement, mainly through planning policy. To assist organizations affected by these commitments, BSI has published BS 42020 which offers a coherent methodology for biodiversity management.

¹⁹ Richmond Biodiversity Partnership (2019): 'London Borough of Richmond Upon Thames. Biodiversity Action Plan)

²⁰ Defra. (2011) *Biodiversity 2020: A strategy for England's wildlife and ecosystem services*.

²¹ <https://www.cbd.int/sp/targets/>

This British Standard sets out to assist those concerned with ecological issues as they arise through the planning process in matters relating to permitted development and activities involved in the management of land outside the scope of land use planning, which could have site-specific ecological implications.

The standard has been produced with input from a number of organisations including the Chartered Institute of Ecology and Environmental Management (CIEEM) and the Association of Local Government Ecologists (ALGE) and provides:

- Guidance on how to produce clear and concise ecological information to accompany planning applications;
- recommendations on professional ethics, conduct, competence and judgement to give confidence that proposals for biodiversity conservation, and consequent decisions/actions taken, are sound and appropriate; and
- direction on effective decision-making in biodiversity management a framework to demonstrate how biodiversity has been managed during the development process to minimize impact.

Legislation

Bats

In summary, all UK bat species are protected by the Conservation of Habitats and Species Regulations 2017 (as amended) and by the Wildlife Countryside Act 1981. Taken together it is an offence to deliberately, intentionally or recklessly:

- Kill, injure or capture a bat;
- Disturb bats in such a way as to be likely significant to affect:
 - (i) the ability of any significant group of bats to survive, breed, or rear / nurture their young; or
 - (ii) the local distribution of that species;
- Damage or destroy any breeding or resting place used by bats; or
- Obstruct access to any place used by bats for shelter or protection and disturbing bats while occupying such as place.

Peregrine Falcon

Peregrines (and their nests) are a Schedule one bird classified under the Wildlife Countryside Act 1981. The following are criminal offences:

- Killing, injuring or taking any wild bird;
- Taking, damaging or destroying the nest of any wild bird whilst that nest is in use or being built;
- Taking or destroying the egg of any wild bird;
- Possessing any live or dead wild bird, or any part, or anything derived from such a bird; and
- Possessing an egg of a wild bird or any part of such an egg.

The following are criminal offences in relation to “Schedule 1” birds:

- Disturbing any Schedule 1 wild bird whilst it is building a nest or is in, on or near a nest containing eggs or young; and

Appendices

- Disturbing dependent young of such a bird.

Breeding/Nesting Birds

Statutory protection is given to all nesting birds in the UK under the WCA 1981 (as amended), which makes it an offence to intentionally kill, injure or take any wild bird, take, damage or destroy its nest whilst in use or being built, or take or destroy its eggs. In addition to this, for species listed on Schedule 1 of the WCA 1981 (as amended), it is an offence to intentionally or recklessly disturb birds while they are nest building, or at or near a nest with eggs or young, or to disturb the dependent young of such a bird.

B. Lee Mantle CV

Lee Mantle

Job Title: Ecologist



Profile:

Lee is an ecologist with a wide range of experience on sites of varying sizes and involving a wide range of issues. Lee has over 17 years continuous consultancy experience in the field of ecology and specialises in protected species issues that often require complex mitigation solutions.

Lee is experienced in habitat and protected/notable species surveys. He has experience in the production of baseline survey reports including Preliminary Ecological Appraisals (PEAs), Ecological Impact Assessments (EclAs), Ecology Chapters in support of Environmental Impact Assessments (EIA) and Habitat Regulations Assessments (HRA) for a range of development related works including residential, highways, commercial and mixed-use development.

Qualifications and Affiliations: BSc (Hons) Environmental Science, MCIEEM

Key Skills:

- Flora and fauna surveys
- Ecological Due Diligence Reports
- PEA reports
- EclA
- Ecology Chapters in support of EIAs
- Habitat Regulations Assessments (HRA)
- Mitigation strategies and method statements for flora and fauna
- Ecological BREEAM assessments
- Ecological CEEQUAL assessments
- Production of Landscape and Ecological Management Plans (LEMP)
- Natural England (NE) license holder for bats (Class 2) and great crested newt (Class 2)
- Production of NE development licenses (named ecologist for bats and great crested newts)
- Biodiversity Net Gain (BNG) Assessments
- Ecological Health and Safety

Project Experience:

| Project / Location | Description |
|--------------------|-------------|
|--------------------|-------------|

| | |
|---------------------------------|--|
| The Mall Walthamstow | Project ecologist for a mixed use development including 538 residential units. Production of a PEA, Bat Survey Report, ecological chapter and BNG assessment. In addition a site specific HRA screening and Appropriate Assessment (AA) was undertaken due to likely significant effects of increased recreational pressure and air pollution upon International and European ecologically designated sites Epping Forest Special Area of Conservation (SAC) and Lee Valley Ramsar and Special Protection Area (SPA) |
|---------------------------------|--|

| | |
|------------------|---|
| Eastleigh | Project ecologist for a development including an energy recovery centre and photovoltaic solar array. Production of a PEA, protected species report (bats, reptiles, badger, birds and great crested newts) and ecological chapter. In addition a site specific HRA screening assessment was undertaken due to likely significant effects of air quality impacts to the terrestrial phase of the southern damselfly upon European designated site River Itchen SAC. |
|------------------|---|

Project Experience:

| Project / Location | Description |
|----------------------|--|
| Edmonton Green | Project ecologist for a mixed use development including 2750 residential units. Production of a PEA, Bat Survey Report, ecological chapter and BNG Assessment. In addition a site specific HRA screening and Appropriate Assessment (AA) was undertaken due to likely significant effects of increased recreational pressure and air pollution upon International and European ecologically designated sites Epping Forest Special Area of Conservation (SAC) and Lee Valley Ramsar and Special Protection Area (SPA) |
| High Road West | Project ecologist for a mixed use development including 2600 residential units. Production of a PEA, Bat Survey Report and ecological chapter and BNG assessment. In addition a site specific HRA screening and Appropriate Assessment (AA) was undertaken due to likely significant effects of increased recreational pressure and air pollution upon International and European ecologically designated sites Epping Forest Special Area of Conservation (SAC) and Lee Valley Ramsar and Special Protection Area (SPA) |
| Westbury Bypass | Project on behalf on Wiltshire Council. Ecological input including management of baseline surveys, pre-construction monitoring and detailed mitigation design for bats prior to public inquiry. This scheme was noted to be the first project of its kind to include all four British Annex II bat species. |
| Highways Agency | Detailed site assessment of the Area 2 soft estate (including the M5 and A303) and report production identifying any potential ecological issues arising from highways works |
| Leybourne Grange | Ecological management and coordination of housing development (over 300 houses) in Kent. Including the soft strip of 32 buildings containing roosting bats and erection of Rope Bridge as common dormouse mitigation. Both under the appropriately approved Natural England development licences |
| Sites in London | Ecological input into proposed development sites (including Cringle Dock part of the Battersea Power Station development, Elephant and Castle, Winstanley Estate, High Road West, Tesco Barking, Crossharbour, Lesnes Estate, Walthamstow and Camden), in London for various clients (including DP9, Land Securities, Eco World Quayside Limited, Lendlease, Taylor Wimpey, Peabody, Trium Environmental, CBRE, RER London Ltd, Stanley Sidings Ltd). Production and undertaking of Preliminary Ecological Appraisals, flora and fauna surveys, EclA, ecological chapters in support of EIA, Habitat Regulations Assessments (HRA) Ecological BREEAM Assessments and Landscape and Ecological Management Plans (LEMP). |
| Rudloe Manor | Management and co-ordination of ecological survey for the restoration and redevelopment of the former Rudloe Manor, North Wiltshire. Emphasis was on the assessment of potential impacts on reptiles, GCN, Badgers and bats (including Greater and Lesser Horseshoe bats on the nearby Bath and Bradford on Avon Bats SAC). Baseline reports to support a planning application and detailed mitigation strategies were produced. |
| Sahara Landfill Site | Great Crested Newt Natural England development licence application with associated translocation and monitoring work. |

C. LBRuT Consultation

From: [Hunter, Tasha](#)
To: [Anna Gargan](#); [Suzanne Thurtle](#); [Thatcher, Lucy](#); [Lee Mantle](#); [Stephen Brindle](#); [Ellen Smith](#); [Guy Duckworth](#); [Neil Henderson](#); [Sophie Thomson](#)
Subject: RE: Ecology meeting - Stag
Date: 18 July 2022 22:39:31
Attachments: [~WRD2742.jpg](#)
[image001.png](#)
[image002.png](#)
[image003.jpg](#)
[image004.png](#)
[image005.png](#)
[image006.jpg](#)

Official

Dear Anna

Many thanks for the summary and attachments.

I have just one change, it was agreed that instead of BNG being required on the application site, some ecological enhancements could be facilitated on the adjacent Mortlake Green. I have submitted a plan with recommendations to my operational colleagues and will come back to you with items they are happy to be installed. In a nutshell they consist of bird/bat boxes, stag beetle loggeries, bulb and hedge planting.

Best wishes

Tasha Hunter

Ecology Policy and Planning Officer

Serving Richmond and Wandsworth Councils

Tel:- 020 8831 6125

tasha.hunter@richmondandwandsworth.gov.uk

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From: Anna Gargan <AGargan@geraldev.com>

Sent: 18 July 2022 17:18

To: Suzanne Thurtle <sthurtle@geraldev.com>; Thatcher, Lucy <Lucy.Thatcher@richmondandwandsworth.gov.uk>; Lee Mantle <lee.mantle@watermangroup.com>; Stephen Brindle <stephen.brindle@watermangroup.com>; Hunter, Tasha <Tasha.Hunter@richmondandwandsworth.gov.uk>; 'Ellen Smith' <ellen.smith@watermangroup.com>; Guy Duckworth <GuyDuckworth@dartmouthcapital.co.uk>; Neil Henderson <NHenderson@geraldev.com>; Sophie Thomson <SThompson@geraldev.com>

Subject: RE: Ecology meeting - Stag

Hi Lucy, Tasha,

I hope you are both well.

Following the meeting held with you both on 7 July '22, Watermans have prepared a summary of the discussions below.

Trust this is useful. Please let me know if you have any comments.

Thanks
Anna

As a result of the meeting earlier this month please find below a synopsis of the ecology aspects we discussed and an update with regards to the surveys undertaken (to date) for both applications. I trust this is a true reflection of events, however if you have any queries please let me know. In addition please find a link below to the Survey Results Spreadsheet (SS), I will update the SS on a regular basis (every Friday afternoon) as the remaining surveys progress. I also attach the plans mentioned in the initial e-mail issued by Anna that detail the building numbers and the external lighting area as part of the Temporary Filming Application. I also attach Figure 3 of the latest PEA that relates to building numbering in the SS that I used initially before different building number plans came out. I have detailed these to avoid building reference errors on my part.

Temporary Filming Application – *It was agreed that the survey effort detailed in the e-mail below was sufficient to accompany the temporary filming application, as no impacts either direct or indirect would occur at building B9 the Maltings (as no internal filming works are proposed or external lighting at this building) and therefore the need for any surveys at the Maltings is not required, including the use of additional drone, IR and thermal imaging methods. It was also agreed that the use of drone, thermal imaging or IR survey methods at buildings B10, B11, B12 and B14 would not be required.*

The surveys highlighted below for the Temporary Filming Application have now been completed. No sightings or any other evidence of peregrine falcon have been recorded as part of the surveys undertaken. No bat roosts have been recorded, however and due to access constraints to the eastern half of the site additional survey effort will be undertaken with single surveyor covering the potential roosting features not visible. This survey is currently planned for the 3rd August.

The results of these surveys (and the proposed additional survey on the 3rd August) will now be used to inform the Technical Appendix (TA) to the ecology section of the Environmental Assessment report. As no roosting bats and nesting peregrine falcons have been recorded no specific mitigation/compensation measures will be detailed in the TA. With regards to lighting the TA will refer to Institute of Lighting Professionals, 2018. Guidance Note 8 Bats and Artificial Lighting, to prevent any up-lighting. In terms of providing an ecological enhancement at the site and given the temporary nature of the application which will not include any groundworks/landscaping on site, enhancement measures are still not proposed on site and no design stage biodiversity net gain assessment is proposed to accompany the application.

Hybrid Application – *It was agreed that undertaking supplementary surveys as detailed in the e-mail below to build on those undertaken in October 2021 was sufficient to address LBRuT comments on the submitted hybrid application (to provide LBRuT with an 'in date' ecological evidence base to determine the application with regards to ecology).*

To date no surveys have been undertaken as part of the hybrid application. The first activity survey was due to commence today but I have postponed this due to the weather warning and will now be undertaken on Thursday this week. As part of the supplementary surveys we will be undertaking update internal surveys of the buildings on site where safe access can be provided, but given the structural issues at building B9 the Maltings (as discussed) no internal surveys will be undertaken at this building. Instead it was proposed that an automated bat detector (SM2) is deployed inside the ground level doorway of the Maltings and set to record for a 5 night period to determine if 'a

peak' in calls are recorded just before or at peak emergence times (will also look at re-entry timing data for bat species as believe this information is available in a study done by Ian Davidson-Watts). This idea was proposed specifically for brown long-eared bats (but will cover other bat species) given LBRuT previous comments and the roosting behaviour of the species that will normally 'warm up' within an internal void before emerging from the roost site). Given the health and safety issues at the buildings regarding internal surveys but taking into account the use of the automated detector survey at the Maltings it was agreed that drone surveys would not be required. The results of the internal surveys over the entire site however would determine if the level of evening emergence and pre-dawn re-entry surveys would need to be subject to change (based on any amendments in potential rating assigned).

As part of the evening emergence and pre-dawn re-entry surveys it was agreed that those undertaken at Building B9 the Maltings will be supplemented with Infra-Red night vision aids given the size of the building and as it was recorded in 2019 to be a pipistrelle day roost. As such the use of thermal imaging surveys would not be required. It was agreed that the use of drone, IR and Thermal imaging surveys would not be required at other buildings/trees on site.

Whilst it was agreed that no other additional surveys for notable or protected species would be required, the results of the peregrine surveys undertaken for the Temporary Filming Application would be included within the protected species report and Ecology ES Chapter addendum. In addition these reports would also detail any changes to the ecological mitigation, compensation and enhancement measures already provided.

I hope this provides a useful synopsis of the ecology aspects we discussed and agreed...and an update with regards to the surveys undertaken (to date) for both applications and is a true reflection of events, however if you have any queries please let me know.

Anna Gargan

Associate

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From: Anna Gargan

Sent: 07 July 2022 10:05

To: Suzanne Thurtle <sthurtle@geraldev.com>; Thatcher, Lucy <Lucy.Thatcher@richmondandwandsworth.gov.uk>; Lee Mantle <lee.mantle@watermangroup.com>; Stephen Brindle <stephen.brindle@watermangroup.com>; Hunter, Tasha <Tasha.Hunter@richmondandwandsworth.gov.uk>; 'Ellen Smith' <ellen.smith@watermangroup.com>; Guy Duckworth <GuyDuckworth@dartmouthcapital.co.uk>; Neil Henderson <NHenderson@geraldev.com>

Subject: RE: Ecology meeting - Stag

Hi Lucy, Tasha,

Ahead of this morning's ecology meeting, please see a note provided by Watermans below covering the proposed approaches for both the temporary and masterplan applications.

Speak soon,
Anna

Thank you for agreeing to attend the Stag Brewery meeting tomorrow to discuss ecological aspects following comments received from yourselves on behalf of LBRuT on both the temporary filming and hybrid application. I have set out Waterman's response to the comments to look to agree the scope and level of additional ecological surveys moving forward.

Temporary Filming Application

On 26th May 2022 my colleague Ellen Smith issued an e-mail directly to Tasha Hunter to advise LBRuT of the proposed ecological surveys to be undertaken to accompany the forthcoming renewal of the temporary application. It is proposed that the scope of additional ecological surveys are based on the findings of the Preliminary Ecological Appraisal (PEA Ref WIE18761-103-1-2-4-PEA) and Protected Species Report (PSR Ref: WIE18671-103-R-4-2-3-PSR) undertaken between August and October 2021 (in respect of the March 2022 Environmental Statement submitted for the hybrid planning application). Given that the age of the bat surveys undertaken as part of the above reports in 2021 and that some surveys were undertaken at the end of the recognised bat active period in October, additional surveys to accompany the renewal of the temporary application are proposed.

For bats this will include the following evening emergence or pre-dawn re-entry surveys at buildings B10, B11, B12 and B14 where filming works are proposed at the buildings internally and along part of the northern boundary wall located directly adjacent to a proposed external lighting area (please refer to attached building plan attached for building numbers and the updated plan that shows the current external lighting area, please note however that no lighting will occur at

building B9 the Maltings) as set out below.

- The provision of a single evening emergence or pre-dawn re-entry survey at building B14 and B12 both assessed as having low potential to support roosting bats as detailed in the PEA in 2021;
- The provision of a single evening emergence and a separate pre-dawn re-entry survey at building B10 and B11 assessed as being a single building with moderate bat potential as detailed in the PEA in 2021.
- Part of the northern boundary wall will be subject to two endoscope inspections (two weeks apart).

In line with industry guidance (Collins, J. 2016) the survey work would be undertaken between May to August, however we would programme the surveys to be completed by the end of July.

Due to the recorded presence of a single roosting peregrine falcon at building B9 (the Maltings) and calling from B3 in October 2021, we are also proposing to undertake further survey effort for this species over the Site to determine if any other buildings are being utilised by the species. The survey work for peregrine falcon at all buildings which would be subjected to building works, would comprise:

- An inspection of the buildings (where suitable and safe access can be provided) to search for signs of roosting activity in early June followed by two surveys to record behaviour of the species on and in the vicinity of the Site in June/July. It should be noted that the timing for these surveys are somewhat late in the season, however, it is assessed that an adequate baseline would still be collated on which to accompany the renewal of the temporary application. The work would be undertaken based on industry guidance (Gilbert et al 1998).

In addition to the above we note that under the London Plan 2021 and other local planning policy that there is a policy requirement to provide an ecological enhancement at the Site. However and given the temporary nature of the application which will not include any groundworks/landscaping, it is not viable to provide ecological enhancement for this application. However, it should be noted that the hybrid planning application provided a design stage biodiversity net gain assessment and has a long term commitment to provide ecological enhancement at the site.

Comments issued by Lucy Thatcher on behalf of LBRuT regarding this approach are detailed below in yellow along with Waterman's response.

1. **Need the bat surveys that are being undertaken in (June / July) – based on the correspondence from Ellen Smith to Tasha Hunter – she is satisfied with the approach proposed for the additional surveys. However, she expects additional bat assessment (thermal imagery) and drones to ensure a proper look at the top of building 9.** The surveys are currently programmed to be completed in July 2022. No impacts are anticipated at building B9 (the Maltings) as no internal filming works are proposed at this building and no lighting of this building is proposed. As no impacts to building B9 (the Maltings) are anticipated we see no reasons for thermal imagery surveys at this building. No internal surveys are possible inside of building B9 (the Maltings) due to structural integrity issues that is preventing a full asbestos survey, in addition we understand that the building is full of pigeons that in itself will have its own health and safety risks. It is also queried if drone surveys would be practical as we understand that internally building B9 (the maltings) is

cluttered with scaffolding. In addition we query what additional and useful information drone surveys would provide.

2. **Ecological enhancement statement – the document states it is not necessary / reasonable – however, the conclusion is subject to the findings of the bat and peregrine falcon surveys being undertaken on Site in June/July 2022.** Agreed, any mitigation and enhancement measures for these species recorded by the additional surveys outlined above will be provided within a technical appendix to the ecology section of the Environmental Assessment report.
3. **Protected species report 2022 – refer to redevelopment application.** I am sorry but I do not understand this comment?

Hybrid Application

Following comments received from LBRuT regarding ecological aspects on the Hybrid Planning Application (planning ref. 22/0900/OUT) and the Detailed Planning Application for the School (planning ref. 22/0902/FUL) we understand that LBRuT ‘cannot assess or comment on these applications fully without the relevant and in date surveys, therefore have no alternative but to recommend refusal due to lack of Protected Species information at this time’. Given the comments received, we are currently proposing to undertake the following additional bat surveys at the Site.

In response to these comments we would look to update the bat surveys in 2022 in-combination with the October 2021 surveys where possible. Whilst October is assessed in industry guidance to be a sub-optimal survey month, bats still utilise ‘summer’ roosting sites before moving on to hibernation roosts when ambient temperatures drop. As the October 2021 bat surveys were undertaken in suitable weather conditions (10 degrees or above) they are still assessed to hold weight.

When undertaking the surveys, we propose the following: We would commence with internal building inspections where safe access can be provided. Following the internal surveys and subject to the results (any change in potential rating assigned) we would repeat the evening emergence or pre-dawn re-entry surveys at low potential buildings (single survey required at each building) but supplement the October 2021 bat surveys in 2022 at moderate and high potential/former roost sites at buildings, trees and the boundary wall (so an addition of a single additional survey at those assigned to have moderate potential and two surveys at high potential or former roost sites). In addition, and as October is an optimal survey month for bat activity transect and automated surveys, we would look to supplement these surveys on two occasions in 2022 to reach the required number for sites offering low potential for foraging and commuting bats. We would also look to supplement the endoscope surveys at the northern river wall with a single endoscope survey (at height). The evening emergence and pre-dawn re-entry survey at Building B9 (the Maltings) will be supplemented with Infra Red night vision aids given the size of the buildings and it as was recorded in 2019 to be a pipistrelle day roost. The results of these surveys and any changes to the ecological mitigation, compensation and enhancement measures already provided will be detailed in a protected species report and Ecology ES Chapter addendum

It is noted that the comments received from LBRuT mention the use of drone surveys to supplement the internal surveys that could not be undertaken due to health and safety issues. As detailed above we query what additional and useful information drone surveys would provide regarding the presence/absence and roost classification of any bat roosts present, given the additional bat surveys that are being proposed.

We note that as part of the comments received from LBRuT only bat surveys were referred. We therefore are not planning to undertake any other additional notable or protected species surveys.

In addition I will prepare a spreadsheet detailing the finding of the surveys that have been completed to date (no bat roosts or signs of peregrine falcon recorded to date) and update it on a regular basis for all concerned as they progress.

Anna Gargan

Associate

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From: Suzanne Thurtle <sthurtle@geraldeve.com>

Sent: 06 July 2022 17:37

To: Thatcher, Lucy <Lucy.Thatcher@richmondandwandsworth.gov.uk>; Lee Mantle <lee.mantle@watermangroup.com>; Stephen Brindle <stephen.brindle@watermangroup.com>; Hunter, Tasha <Tasha.Hunter@richmondandwandsworth.gov.uk>; 'Ellen Smith' <ellen.smith@watermangroup.com>; Guy Duckworth <GuyDuckworth@dartmouthcapital.co.uk>; Neil Henderson <NHenderson@geraldeve.com>; Anna Gargan <AGargan@geraldeve.com>

Subject: RE: Ecology meeting - Stag

Dear all,

Ahead of the meeting tomorrow, I attach a brief agenda.

Kind regards

Suzanne

Suzanne Thurtle

Associate

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-----Original Appointment-----

From: Suzanne Thurtle **On Behalf Of** Thatcher, Lucy

Sent: 05 July 2022 10:57

To: Lee Mantle; Stephen Brindle; 'Ellen Smith'; Guy Duckworth; Neil Henderson; Anna Gargan

Subject: FW: Ecology meeting - Stag

When: 07 July 2022 11:30-12:30 (UTC+00:00) Dublin, Edinburgh, Lisbon, London.

Where: Microsoft Teams Meeting

-----Original Appointment-----

From: Thatcher, Lucy <Lucy.Thatcher@richmondandwandsworth.gov.uk>

Sent: 04 July 2022 18:53

To: Thatcher, Lucy; Hunter, Tasha; Suzanne Thurtle

Subject: Ecology meeting - Stag

When: 07 July 2022 11:30-12:30 (UTC+00:00) Dublin, Edinburgh, Lisbon, London.

Where: Microsoft Teams Meeting

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From: [Ellen Smith](#)
To: Tasha.Hunter@richmondandwandsworth.gov.uk
Cc: [Stephen Brindle](#); [Lee Mantle](#); [Diane Corfe](#); [Suzanne Thurtle](#)
Subject: Stag Brewery - temporary use application - ecology surveys
Date: 26 May 2022 17:29:19
Attachments: [image001.jpg](#)
[image002.jpg](#)
[WIE18671-113_GR_EnvR_2A.pdf](#)

Dear Tasha,

As you are aware a temporary planning permission was granted to permit filming activities at the former Stag Brewery. This is due to expire shortly. Due to the delays with the Stag Brewery redevelopment our client is seeking an extension by way of a new application for continued temporary filming uses. Owing to the proposed timetable for the submission of the application we would like to advise you our intended ecological assessment approach to considering the ecological impacts in advance of the forthcoming renewal of the temporary application.

To accompany the new temporary use planning application, we are proposing to base our assessment on the findings of the Preliminary Ecological Appraisal (PEA Ref WIE18761-103-1-2-4-PEA) and Protected Species Report (PSR Ref: WIE18671-103-R-4-2-3-PSR) undertaken between August and October 2021 (in respect of the March 2022 Environmental Statement submitted for the hybrid planning application). However, we recognise that due to the age and coverage of the bat surveys undertaken, further supplementary survey works maybe required in this regard to ensure there is a complete survey baseline to accompany the new temporary planning application. In particular, this will include further assessment of building B10, B11, B12 and B14 (please refer to attached building plan).

The recommended survey work for bats at buildings B10, B11, B12 and B14 would comprise:

- The provision of a single evening emergence or pre-dawn re-entry survey at building B14 and B12 (by 4 surveyors) both assessed as having low potential to support roosting bats at part of the PEA in 2021; and
- The provision of a single evening emergence and a separate pre-dawn re-entry survey at building B10 and B11 (by 3 surveyors) assessed as being a single building with moderate bat potential as part of the PEA in 2021.

In addition, given there will also be external filming use adjacent to the Malting building, the northern boundary wall will be subject to two endoscope inspections (two weeks apart).

In line with industry guidance (Collins, J. 2016) the survey work would be undertaken between May to August, however we would programme the surveys to be completed by the end of July.

Due to the recorded presence of a single roosting peregrine falcon at building B9 and calling from B3 in 2021, we are also proposing to undertake further survey effort for this species is undertaken over the Site to determine if any other buildings are being utilised by the species. The survey work for peregrine falcon at all buildings which would be subjected to building works, would comprise:

- An inspection of the buildings to search for signs of roosting activity in May/June followed by two surveys to record behaviour of the species on and in the vicinity of the Site in

June/July. It should be noted that the timing for these surveys are somewhat late in the season, however, it is assessed that an adequate baseline would still be collated on which to accompany the new planning application. The work would be undertaken based on industry guidance (Gilbert et al 1998).

The results of the updated ecological baseline will be presented as a technical appendix to the ecology section of the Environmental Assessment report.

We understand there is also a policy requirement to provide an Ecological Enhancement Statement. This will state that given the temporary nature of the application which will not include any groundworks / landscaping, it is not viable to provide ecological enhancement for this application. However, it should be noted that the hybrid planning application has a long-term commitment to provide biodiversity net gain.

We trust that this approach is acceptable, however, should you have any comments we would be pleased to discuss them with you. Lee Mantle (who is CCed in to this email) is our lead ecologist for this project and will be happy to discuss this with you on Monday when he returns from leave.

Kind regards,
Ellen

Ellen Smith
Principal Consultant
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D. Results of Nesting Bird Building Check – 10 June 2022

| Building Number | Exterior | Interior |
|-----------------|--|--|
| 1 | N/A – no signs of nesting birds recorded | N/A - no signs of nesting birds recorded |
| 2 | N/A – no signs of nesting birds recorded, however no access to check behind pipes on east side of building | No access |
| 3 | Holes in east side of building. Evidence of feral pigeon inside. Young feral pigeon calling (assessed to be breeding) | No access |
| 4 | N/A – However north and south side of the building is part-demolished so access for nesting/breeding birds exists. Feral pigeons seen to fly out from south side of the building | No access |
| 5 | Holes in east side of the building. Feral pigeon seen entering. | No access |
| 6 | Likely to be feral pigeon nests in roof area | Restricted access. Approximately 7+ feral pigeon nests though no signs of any supporting young |
| 7 | Hole in building fabric on south side that could be accessed by birds | No access |
| 8 | Holes in windows on north side of the building | No access |
| 9 | Feral pigeon perching on outside - pigeon spikes on most windows | Restricted access. No young heard from bottom of stairwell - breeding status inconclusive |
| 10 | N/A - no signs of nesting birds recorded | N/A - no signs of nesting birds recorded |
| 11 | N/A - no signs of nesting birds recorded | N/A - no signs of nesting birds recorded |
| 12 | N/A - no signs of nesting birds recorded | N/A - no signs of nesting birds recorded |
| 13 | Nothing on main building but pigeon netting in poor repair in loading bay on south side and feral pigeon singing | No access |
| 14 | N/A - no signs of nesting birds recorded | N/A - no signs of nesting birds recorded |
| 15 | N/A - no signs of nesting birds recorded | N/A - no signs of nesting birds recorded |
| 16 | N/A - no signs of nesting birds recorded | N/A - no signs of nesting birds recorded |
| 17 | Feral pigeon - 1 nest | No access |
| 18 | N/A - no signs of nesting birds recorded | No access |
| 19 | N/A - no signs of nesting birds recorded | N/A – Wall. |

E. Results of Nesting Bird Building Check – 24 June 2022

| Building Number | Exterior | Interior |
|-----------------|--|---|
| 1 | N/A - no signs of nesting birds recorded | N/A - no signs of nesting birds recorded |
| 2 | N/A - no signs of nesting birds recorded | No access |
| 3 | N/A - no signs of nesting birds recorded | No access |
| 4 | N/A - no signs of nesting birds recorded | No access |
| 5 | N/A - no signs of nesting birds recorded | No access |
| 6 | N/A - no signs of nesting birds recorded | Restricted access. Approximately 7+ feral pigeon nests though no signs of any supporting young |
| 7 | N/A - no signs of nesting birds recorded | No access |
| 8 | N/A - no signs of nesting birds recorded | No access. Feral pigeon flew inside - nesting |
| 9 | FP perching on building | Restricted access. No young heard from bottom of stairwell - breeding status inconclusive. Feral pigeon flew inside - nesting |
| 10 | N/A - no signs of nesting birds recorded | N/A - no signs of nesting birds recorded |
| 11 | N/A - no signs of nesting birds recorded | N/A - no signs of nesting birds recorded |
| 12 | Grey wagtail singing from roof. Lesser black-backed gull perched on roof | N/A - no signs of nesting birds recorded |
| 13 | N/A - no signs of nesting birds recorded | No access |
| 14 | N/A - no signs of nesting birds recorded | N/A - no signs of nesting birds recorded |
| 15 | N/A - no signs of nesting birds recorded | N/A - no signs of nesting birds recorded |
| 16 | N/A - no signs of nesting birds recorded | N/A - no signs of nesting birds recorded |
| 17 | N/A - no signs of nesting birds recorded | No access |
| 18 | N/A - no signs of nesting birds recorded | No access |
| 19 | N/A - no signs of nesting birds recorded | N/A – Wall. |

F. Results of Nesting Bird Building Check – 12 July 2022

| Building Number | Exterior | Interior |
|-----------------|--|--|
| 1 | N/A | N/A - no signs of nesting birds recorded |
| 2 | N/A | No access |
| 3 | 4 feral pigeons on roof | No access |
| 4 | Feral pigeon flew out; 2 feral pigeons perching on outside of building | No access |
| 5 | Feral pigeon flew out from the east side of the building | No access |
| 6 | 2 feral pigeons flew out from the building. Starling singing from roof | Restricted access. Approximately 7+ feral pigeon nests though no signs of any supporting young |
| 7 | N/A | No access |
| 8 | N/A | No access. Feral pigeon flew inside - nesting |
| 9 | All windows except one now blocked off. Feral pigeon on ledge of open window | Access to stairwell. Feral pigeon heard flapping inside. No young heard. |
| 10 | N/A | N/A - no signs of nesting birds recorded |
| 11 | N/A | N/A - no signs of nesting birds recorded |
| 12 | Feral pigeon flew out from east side of the building | N/A - no signs of nesting birds recorded |
| 13 | N/A | No access |
| 14 | N/A | N/A - no signs of nesting birds recorded |
| 15 | N/A | N/A - no signs of nesting birds recorded |
| 16 | N/A | N/A - no signs of nesting birds recorded |
| 17 | N/A | No access |
| 18 | N/A | No access |
| 19 | N/A | N/A – Wall. |

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“Engineering a better environment for people and the planet”

Our mission

“To solve complex problems for the benefit of clients, communities and the climate”

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Individually and collectively, people are our business. We strive to create environments for everyone to flourish and thrive.

Flexible

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Operating at pace with integrity to deliver technical and robust solutions.

Environmentally aware

We understand our responsibility to the environment, it shapes our decision making and informs our practice.

Innovative

Our forensic questioning provides the ability to deliver appropriate innovations at every stage on every project.

Relationship focused

We value individuality and the benefits of working collaboratively to achieve positive outcomes for all.

