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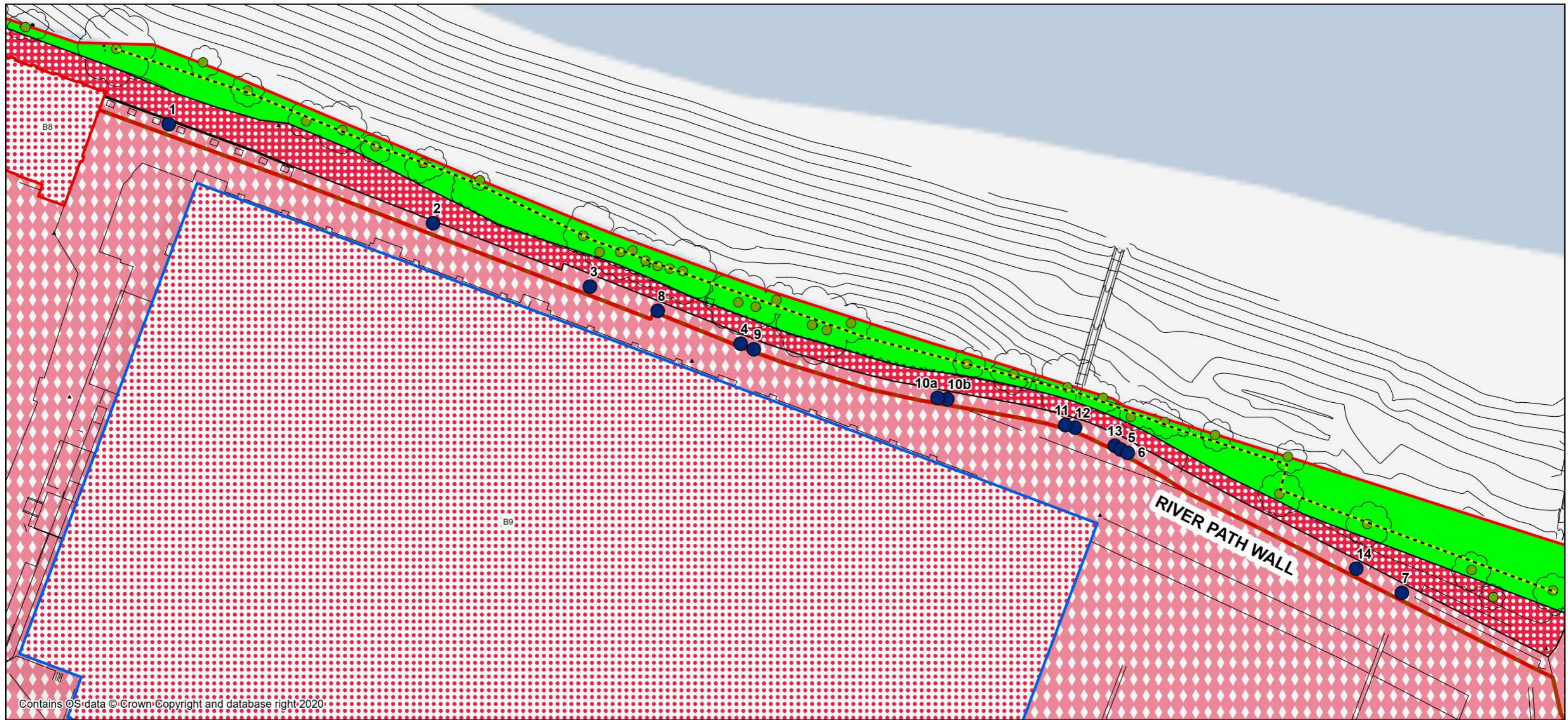
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|--|------------------------------------|---|
| Planning Application Boundary | Hardstanding - u1b6 - 111 | Trees with Moderate Bat Roost Potential |
| S278 Works Boundary | Wall - u1e - 68, 80 | Buildings with Low Bat Potential |
| Modified Grassland - 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 Unvegatated Unsealed Surface - u1c - 17, 80 | Urban Tree - u - 1170 | Invasive Species |
| Buildings - u1b5 - 97 | Trees with Low Bat Roost Potential | |



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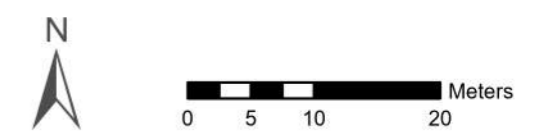
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Figure Title	Figure 1: Habitat Features Plan
Figure Ref	WIE18671-103-GIS-EC-PSR-1A
Date	January 2022
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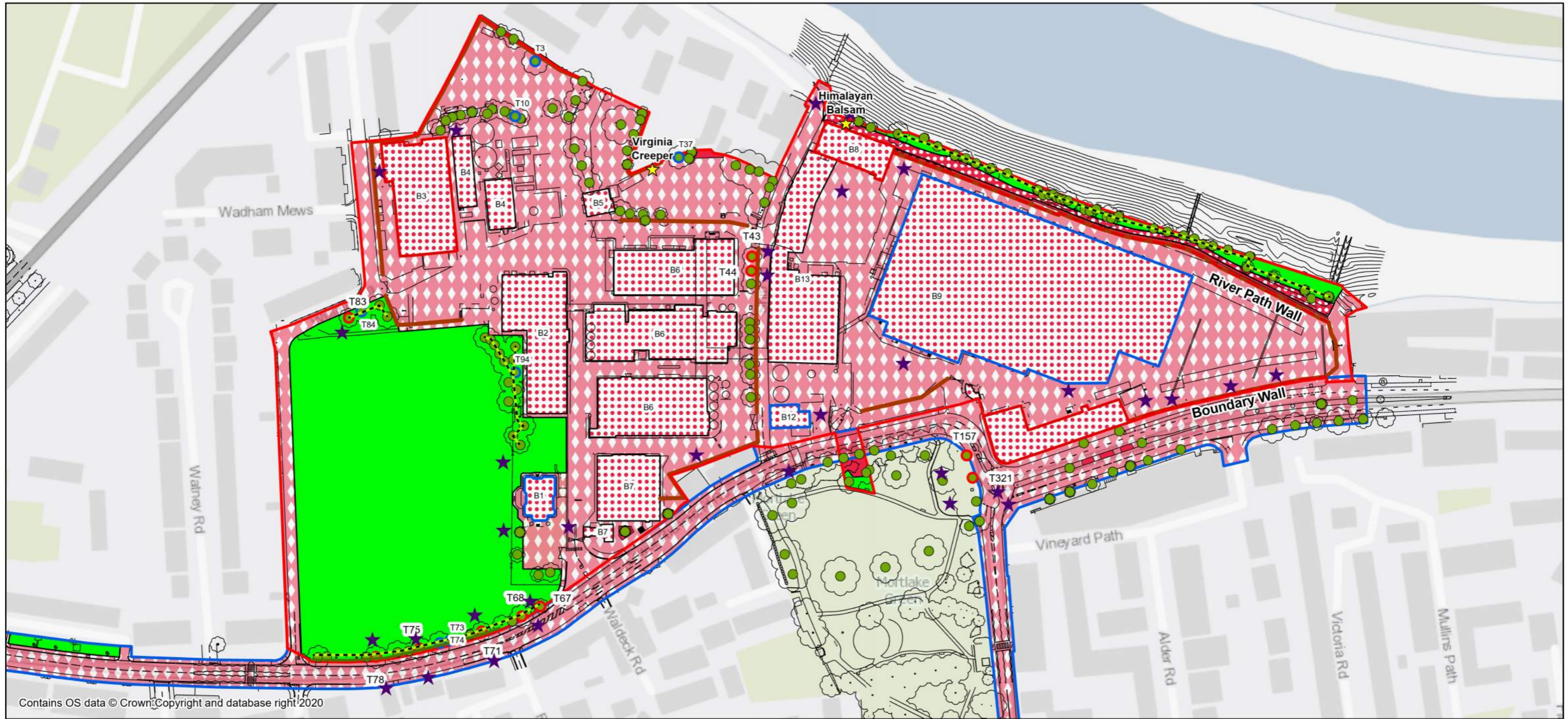


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- Planning Application Boundary
- Potential Roosting Features
- Buildings - u1b5 - 97
- Artificial Unvegetated Unsealed Surface - u1c - 17, 80
- Hardstanding - u1b6 - 111
- Modified Grassland - g4 - 64, 66, 75, 76
- Urban Tree - u - 1170
- Line of Trees - w1g6, 76
- Wall - u1e - 68, 80
- Features with Moderate Bat Potential
- Buildings with Moderate Bat Potential
- Buildings with Low Bat Potential

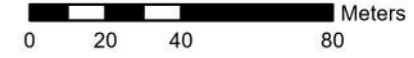


Project Details	WIE18671-103: Stag Brewery
Figure Title	Figure 2: Northern Boundary Wall Feature Locations
Figure Ref	WIE18671-103-GIS-EC-PSR-2A
Date	January 2022
File Location	\\s-inc\wiel\projects\wie18671\100\gis\ec\psr
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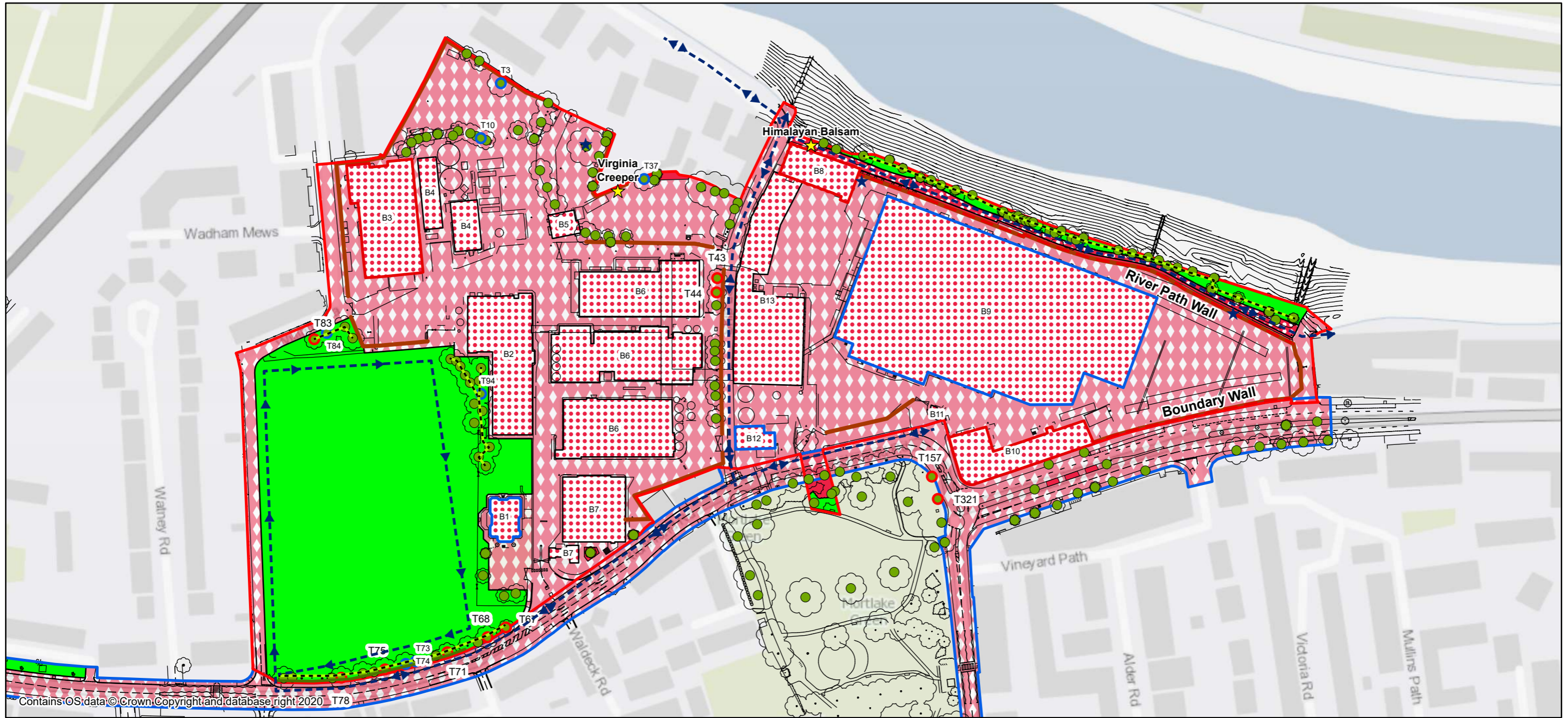


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|--|---|---------------------------------------|
| Planning Application Boundary | Hardstanding - u1b6 - 111 | Trees with Low Bat Roost Potential |
| S278 Works Boundary | Buildings - u1b5 - 97 | Urban Tree - u - 1170 |
| Bat Surveyor Locations | Hedgerow - h2b - 17, 48, 1160 | Invasive Species |
| Modified Grassland - g4 - 64, 66, 75, 76 | Line of Trees - w1g6, 76 | Buildings with Low Bat Potential |
| Ornamental Planting - u - 48, 80, 1160 | Wall - u1e - 68, 80 | Buildings with Moderate Bat Potential |
| Artificial Unvegetated Unsealed Surface - u1c - 17, 80 | Trees with Moderate Bat Roost Potential | Features with Moderate Bat Potential |



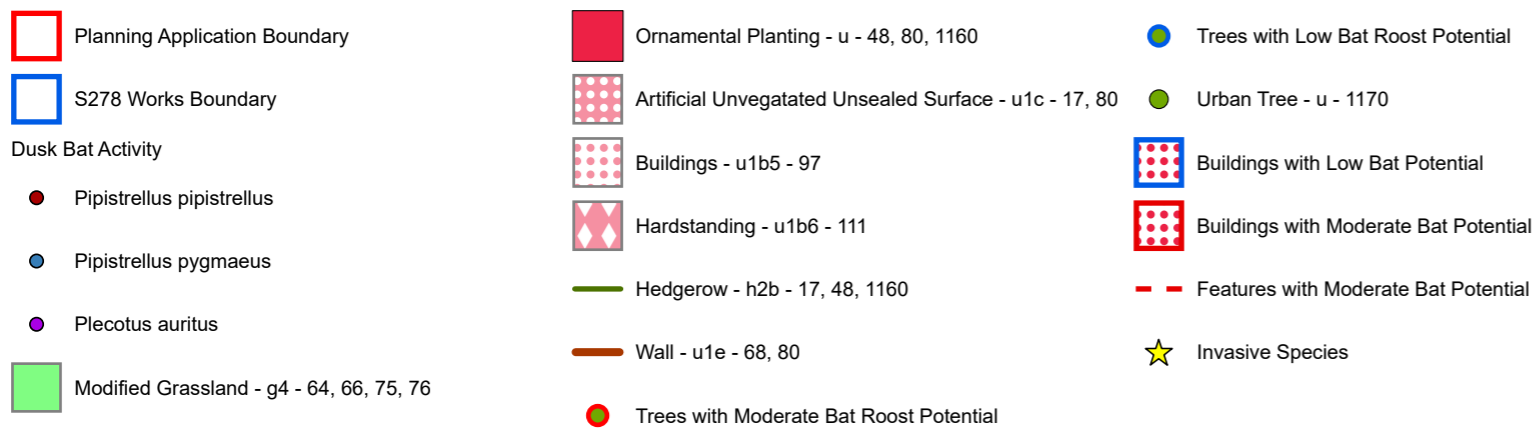
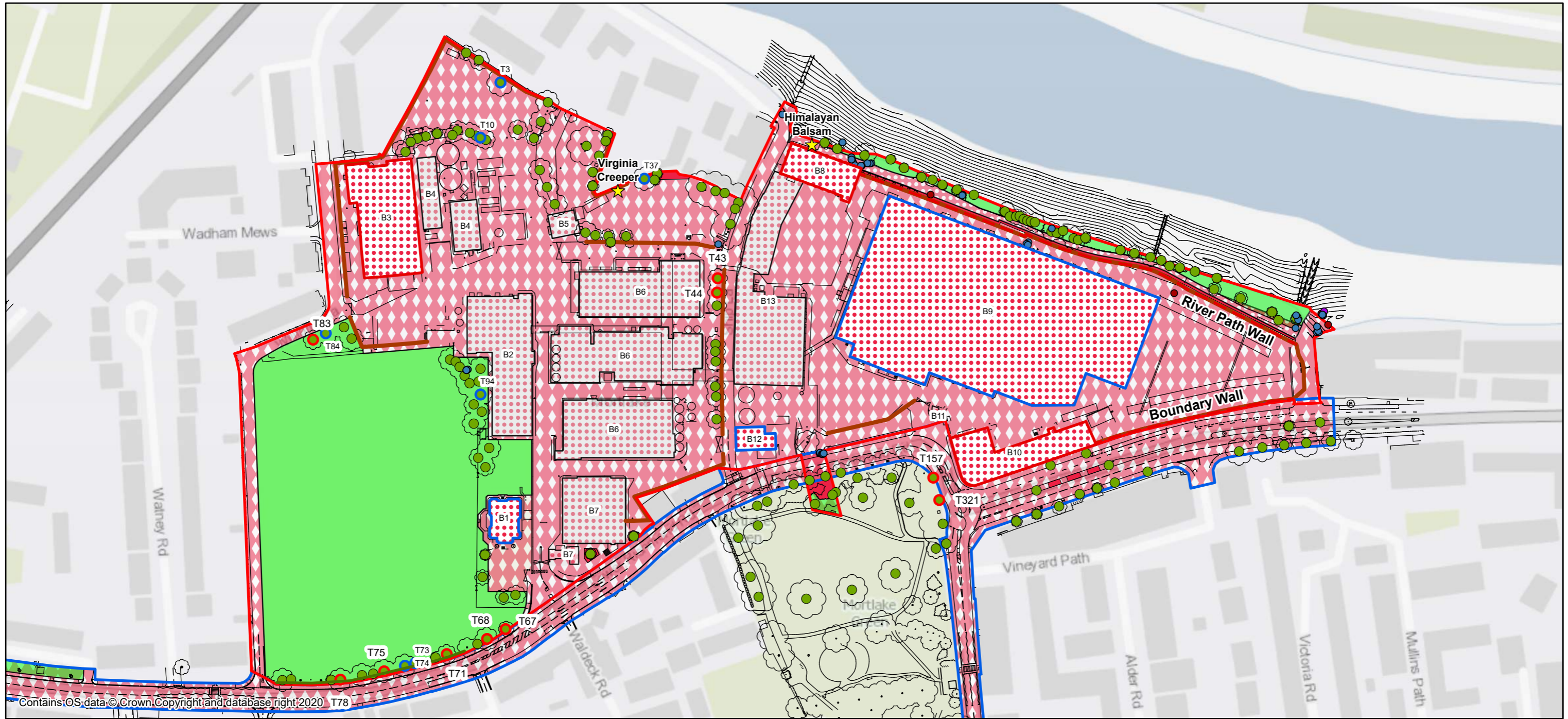
Project Details	WIE18671-103: Stag Brewery
Figure Title	Figure 3: Evening Emergence Bat Surveyor Locations
Figure Ref	WIE18671-103-GIS-EC-PSR-3A
Date	January 2022
File Location	\\s-inc\wie\projects\wie18671\100\gis\ec\psr
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|--|--|---------------------------------------|
| Planning Application Boundary | Modified Grassland - g4 - 64, 66, 75, 76 | Line of Trees - w1g6, 76 |
| S278 Works Boundary | Hardstanding - u1b6 - 111 | Invasive Species |
| Bat Activity Transect | Hedgerow - h2b - 17, 48, 1160 | Features with Moderate Bat Potential |
| Bat Detector Locations | Trees with Moderate Bat Roost Potential | Buildings with Moderate Bat Potential |
| Buildings - u1b5 - 97 | Trees with Low Bat Roost Potential | Buildings with Low Bat Potential |
| Artificial Unvegetated Unsealed Surface - u1c - 17, 80 | Urban Tree - u - 1170 | |
| Ornamental Planting - u - 48, 80, 1160 | Wall - u1e - 68, 80 | |



Project Details	WIE18671-103: Stag Brewery
Figure Title	Figure 4: Bat Activity Survey Transect and Static Detector Locations
Figure Ref	WIE18671-103-GIS-EC-PSR-4A
Date	January 2022
File Location	\\s-inc\wiel\projects\wie18671\100\gis\ec\psr
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Project Details	WIE18671-103: Stag Brewery
Figure Title	Figure 5: Activity Survey Results October 2021
Figure Ref	WIE18671-103-GIS-EC-PSR-5A
Date	January 2022
File Location	\\s-inc\wiel\projects\wie18671\100\gis\ec\psr

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 2021¹². Section 15 (outlined below) of the NPPF, ‘Conserving and Enhancing the Natural Environment’, replaces Section 11 of the previous NPPF 2012 revision and NPPF 2018¹³. No significant changes to Section 15 are noted between the 2019¹⁴ and 2021 update. The Government Circular 06/2005¹⁵ - 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:

¹² Ministry of Housing, Communities and Local Government. (2021). *National Planning Policy Framework*.

¹³ Ministry of Housing, Communities and Local Government. (2018). *National Planning Policy Framework*.

¹⁴ Ministry of Housing, Communities and Local Government. (2019). *National Planning Policy Framework*

¹⁵ Department of Communities and Local Government. (2005). *Circular 06/05: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System*.

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- *“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;*
- *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 2016¹⁶, updated in 2019¹⁷ (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;*

¹⁶ Department for Communities and Local Government. (2016). *National Planning Practice Guidance*. DCLG, London.

¹⁷ Department for Communities and Local Government. (2019). *National Planning Practice Guidance*. DCLG, London.

- 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*
- 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, 2018¹⁸ 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 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;

¹⁸ Mayor of London (2018) *London Environment Strategy*

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*

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 interms 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;*

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- 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;*

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- 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’¹⁹ 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.”*

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)²⁰.

The LBRuT adopted a planning brief for the Site in July 2011 with SPD²¹ status. This document sets out opportunities and constraints regarding the redevelopment of the Site. With regard to biodiversity, this SPD states:

¹⁹ London Borough of Richmond upon Thames (no-date); ‘Design Guidelines for Nature Conservation & Development’.

²⁰ London Borough of Richmond upon Thames (2005); ‘Unitary Development Plan. Chapter 12 – Local Strategies and Plan Proposals’.

²¹ London Borough of Richmond upon Thames (2011); ‘Stag Brewery, Mortlake, SW14 Planning Brief. Supplementary Planning Guidance’.

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“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’²². 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’²³ covers the period from 2011 to 2020. This now supersedes the UK Biodiversity Action Plan (UK BAP)²⁴. 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.

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).

²² London Borough of Richmond upon Thames (2015); ‘Mortlake Village Planning Guidance. Supplementary Planning Guidance’.

²³ JNCC and DEFRA (on behalf of the Four Countries’ Biodiversity Group). (2012). UK Post-2010 Biodiversity Framework.

²⁴ HMSO. (1994) Biodiversity The UK Action Plan.

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Richmond Biodiversity Action Plan

The Biodiversity Action Plan for the London Borough of Richmond upon Thames (LBRuT)²⁵ 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*'²⁶. 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 targets²⁷, 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.

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;

²⁵ Richmond Biodiversity Partnership (2019): 'London Borough of Richmond Upon Thames. Biodiversity Action Plan)

²⁶ Defra. (2011) *Biodiversity 2020: A strategy for England's wildlife and ecosystem services*.

²⁷ <https://www.cbd.int/sp/targets/>

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- 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
- Disturbing dependent young of such a bird.

B. Photographs



Plate 1 – 2019 Soprano pipistrelle emergence location from a second-floor window on the northern façade of The Maltings (B8).

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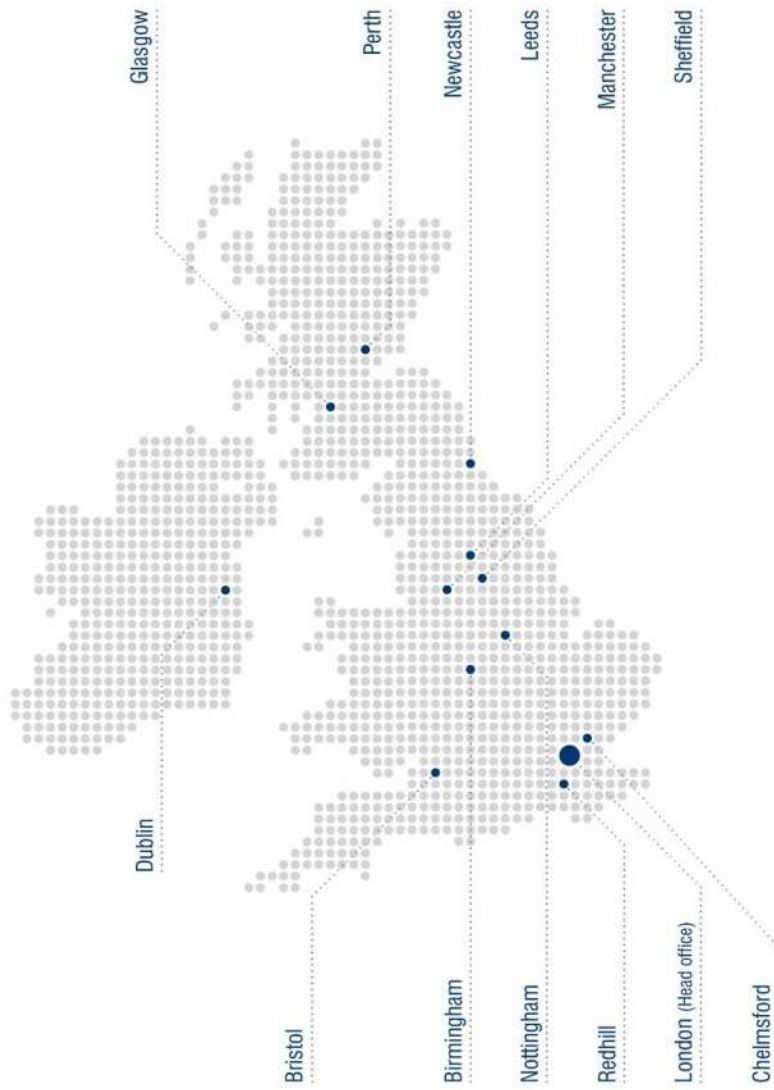
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Plate 2: Approximate location of peregrine falcon roost on southern aspect of building B8 (The Maltings).

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UK and Ireland Office Locations



G. Protected Species Report, February 2023 (WIE18671-116-R-19-2-1-PSR)



Stag Brewery, Mortlake – Permanent Filming Use Application

Protected Species Report

February 2023

Waterman Infrastructure & Environment Limited

Pickfords Wharf, Clink Street, London, SE1 9DG
www.watermangroup.com

Client Name: Reselton Properties Ltd
Document Reference: WIE18671-116-R-19-2-1-PSR
Project Number: WIE18671-116

Quality Assurance – Approval Status

This document has been prepared and checked in accordance with
Waterman Group's IMS (BS EN ISO 9001: 2015, BS EN ISO 14001: 2015 and BS EN ISO 45001:2018)

Issue	Date	Prepared by	Checked by	Approved by
02	February 2023	Lee Mantle Ecologist	Ellen Smith Principal Consultant	Ros Boalch Associate Director



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 at the former Stag Brewery site (hereafter referred to as the 'Site'). A planning application is proposed for film production operations and ancillary activities. 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 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 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.
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.

Planning Application Ref	Ecological Survey Work Undertaken	Date of Assessment and Reporting
	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

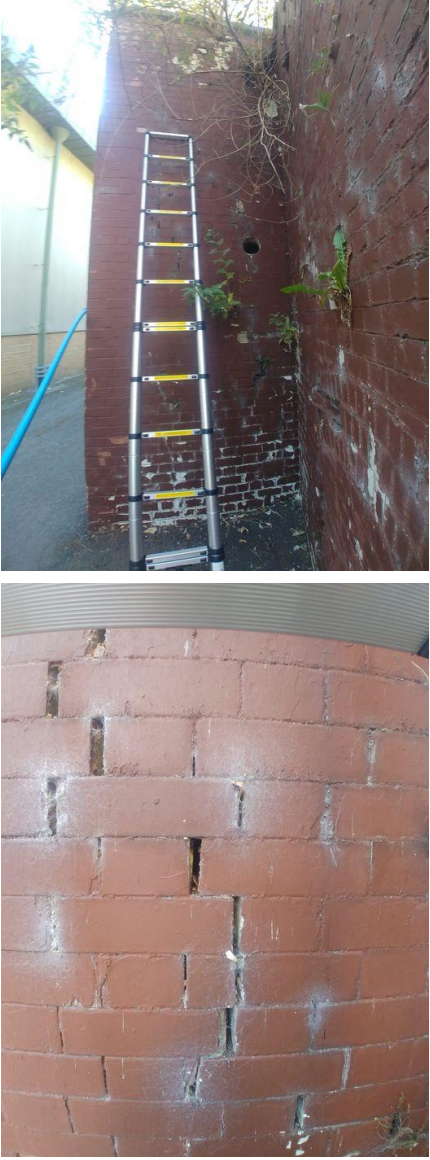
Northern boundary wall Inspection

- 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>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 haerd 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

recoded 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 Visit 3 (12 July 2022) - 1	1

Bird Species	Species Code	Notable Status	Likely Breeding Status	Number of Birds Recorded Per Visit	Total Number of Birds Recorded
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 as part of the proposed Development will be provided off Site at Mortlake Green (local public greenspace) as agreed with LBRuT. The enhancement measures will include the provision of 5 bird and 5 bats boxes along with the creation of 3 stag beetle loggeries. The provision of the enhancement measures will be secured by legal agreement.
- 4.9. As the proposed Development will not result in the removal of any buildings or vegetation it is assessed that it is not possible to provide or undertaken a design stage biodiversity net gain assessment to accompany the planning application under the requirement of the Environmental Act 2021, NPPF, London Plan 2021 Policy G6 and those detailed under the New Local Plan (Richmond Local Plan 'The Best for our borough' – Draft for consultation 2021). A design stage biodiversity net gain assessment accompanied the 2022 Planning Applications and concluded that in the long-term, the proposed masterplan would provide a 29.55% net gain for the habitats on Site and 21.04% net gain for hedgerows on Site. The proposed masterplan would achieve the minimum mandatory 10% net gain required by the Environment Act 2021 (when it comes into force, currently understood to be in late 2023) and London Plan and the 20% now proposed by the New Local Plan.

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 as part of the proposed Development will be provided off Site at Mortlake Green (local public greenspace), and secured by legal agreement.
- 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

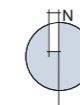
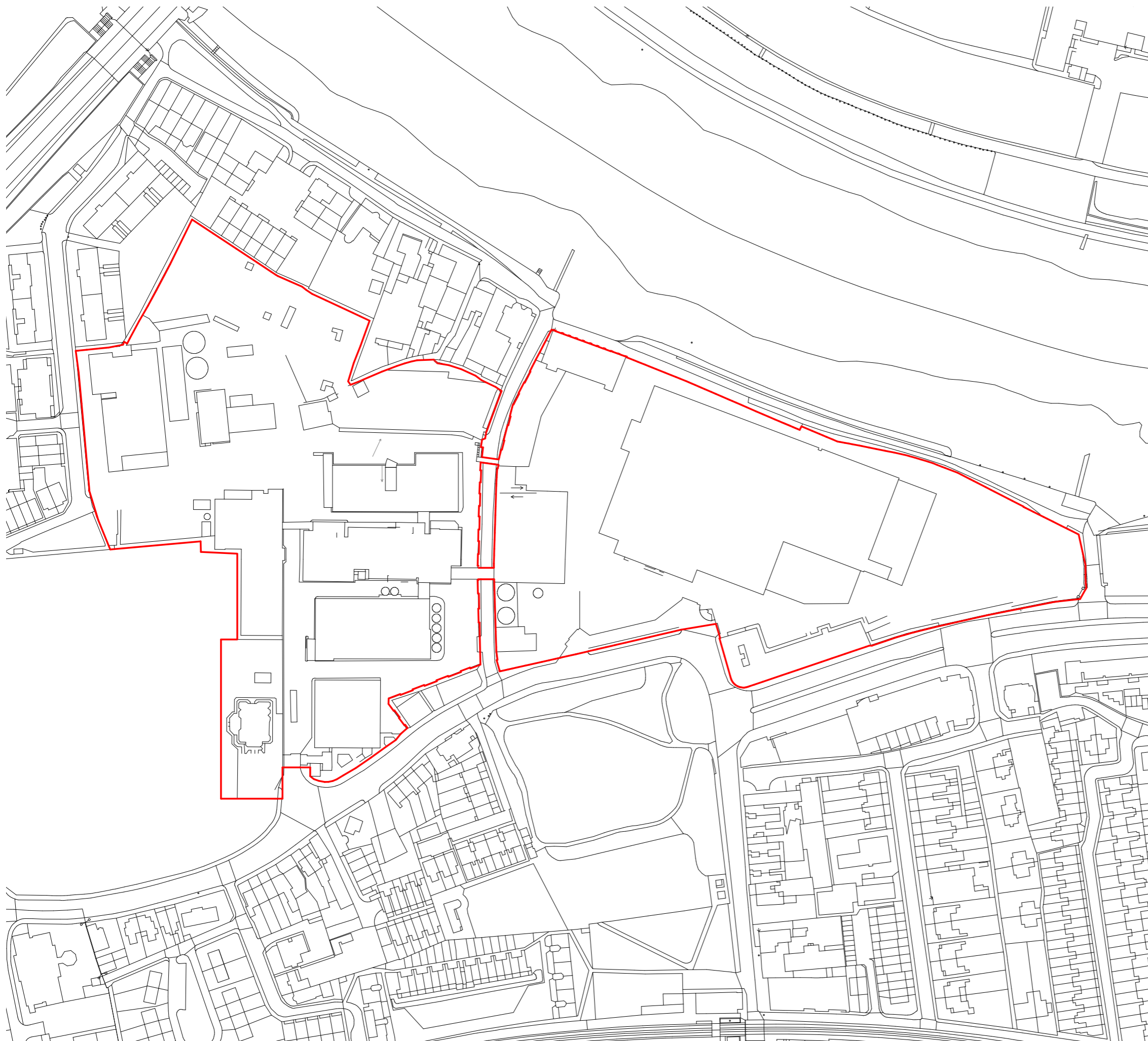
Figure 3: Evening Emergence and/or Pre-Dawn Re-Entry Bat Surveyor Locations

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

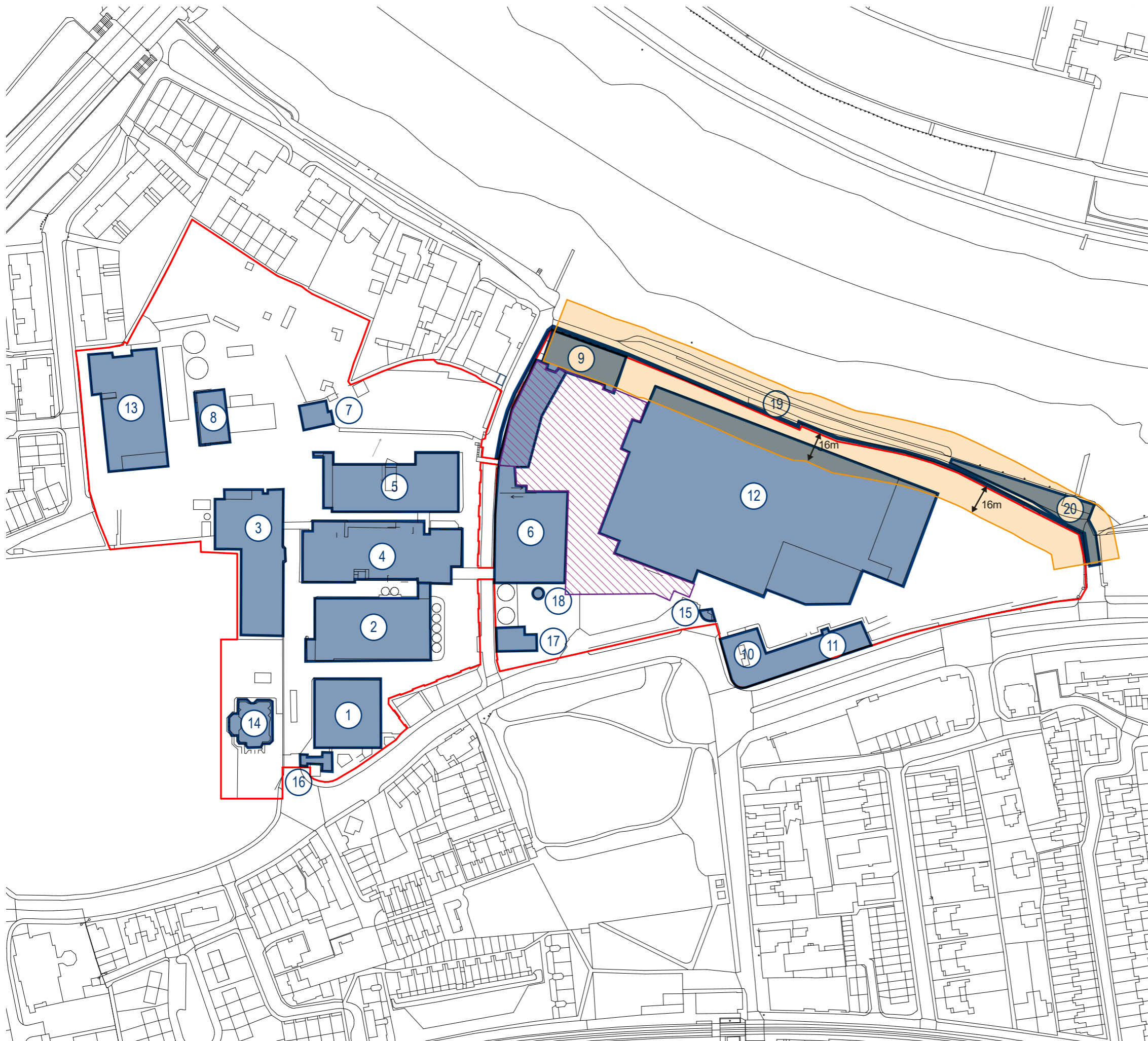
Figure 5: Peregrine Falcon and Breeding Bird Survey Map – 24th June 2022

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

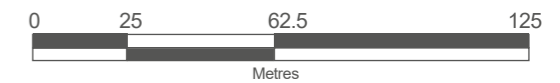
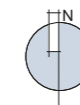
 Site Boundary



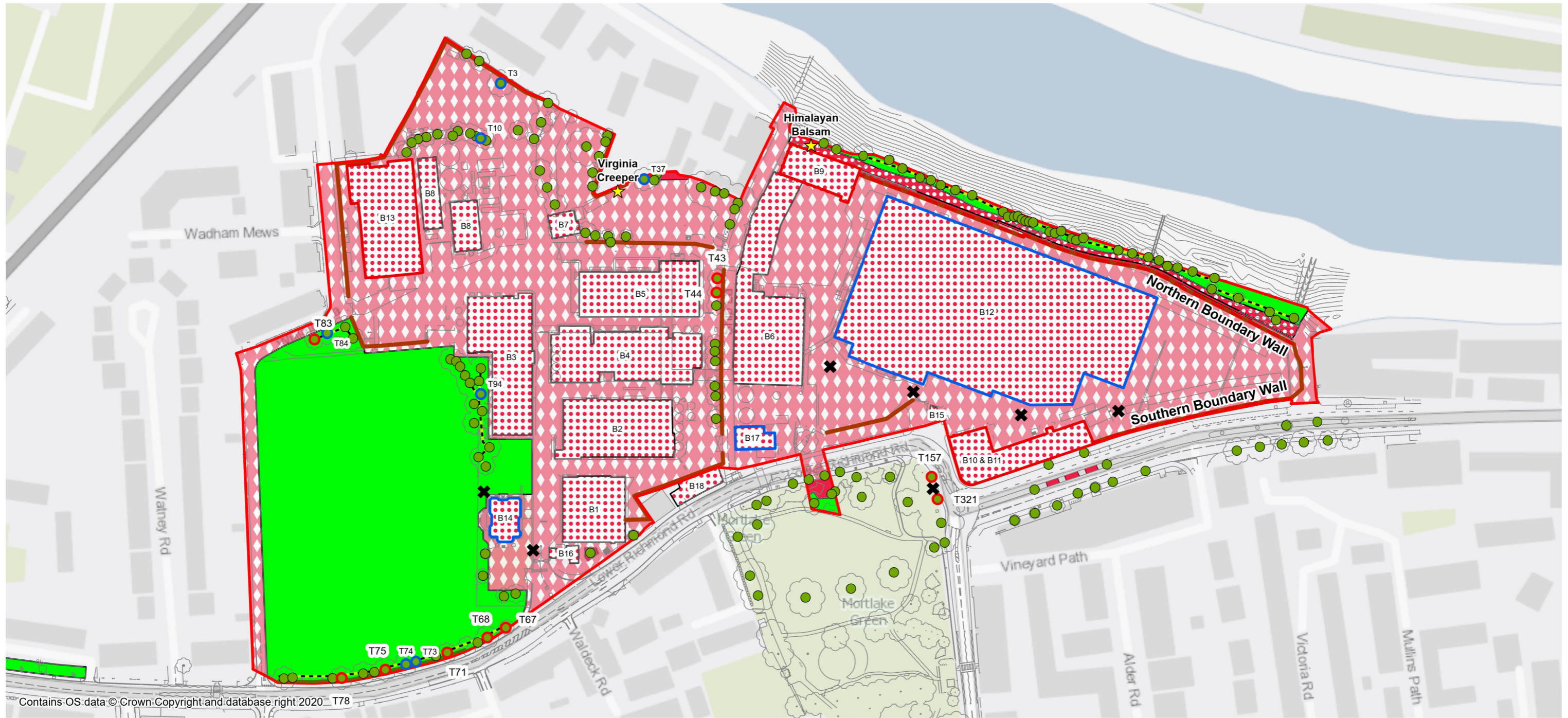
Project Details	WIE18671-116: Stag Brewery Permanent Filming Use Application
Figure Title	Figure 1: Site Location Plan
Figure Ref	WIE18671-116_GR_PSR_1A
Date	February 2023
File Location	\\s-inc\wiel\projects\wie18671\100\graphics\19\issued figures



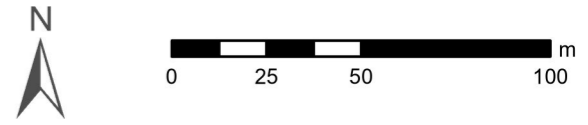
- | | |
|---|---|
| Site Boundary | External Filming Use Area |
| 16m Exclusion Zone from Tidal Flood Defence | Former Bottling Hall |
| P.O.B | Packaging |
| Brewhouse | Stable Court |
| Process Building | Sports Club |
| Chip Cellar | East Gatehouse |
| Finishing Cellar | West Gatehouse |
| Power House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



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-incls\wie\projects\wie18671\100\graphics\19\issued figures



- | | | |
|--|---|---------------------------------------|
| 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 Unvegatated 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 | |

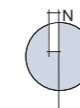


Project Details	WIE18671-116: Stag Brewery Permanent Filming Use Application
Figure Title	Figure 3: Habitat Features (UK Habs)
Figure Ref	WIE18671-116-GIS-PSR-3A
Date	February 2023
File Location	\\s-incs\wiel\projects\wie18671\116\gis\psr
	www.watermangroup.com



- ◆ 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-incs\wie\projects\wie18671\100\graphics\19\issued figures