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Date: 16<sup>th</sup> September 2022

**Lucy Thatcher**

Strategic Applications Manager  
Richmond Council  
44 York Street  
Twickenham  
TW1 3BZ

Dear Lucy

**RE: Former Stag Brewery, Mortlake, Hybrid Planning Application (22/0900/OUT) & Detailed Application School (22/0902/FUL) – Environmental Statement - Statement of Conformity**

Following comments from the London Borough of Richmond upon Thames (LBRuT) on the Hybrid Planning Application (ref: 22/0900/OUT) and Detailed School Application (ref: 22/0902/FUL) submitted in March 2022 for redevelopment of the Former Stag Brewery in Mortlake, Waterman Infrastructure & Environment Limited (Waterman) has undertaken further bat and peregrine falcon and breeding bird surveys in the period of June to August 2022.

A meeting was held with yourself and Tasha Hunter (LBRUT's ecological officer) on 7<sup>th</sup> July 2022 to discuss the scope of the further bat, peregrine falcon and breeding bird surveys. It was agreed that undertaking supplementary surveys to build on those undertaken in October 2021 was appropriate to address LBRuT comments and to provide LBRuT with an 'in date' ecological evidence baseline to determine the Applications with regards to ecology.

To reflect the new information, a replacement ES Chapter 13: Ecology and ES Appendix 13.3: Supplementary Protected Species Survey has been prepared to report the findings of the supplementary protected species surveys undertaken in June to August 2022. For ease of reference we are submitting the revised ES Chapter alongside all supporting figures and appendices as replacement documents.

The key changes to the ES Chapter and associated appendix includes:

- Details on the 2022 consultation and the supplementary surveys undertaken;
- New numbering system of existing building numbers to match the building numbering in ES Figure 3.1;
- Clarification on the lighting strategy and that up-lighting would be avoided;
- Appendix 13.3 WFD Screening request and response and Appendix 13.4 BNG Assessment, are updated to Appendix 13.4 and 13.5, respectively. These are unchanged other than their reference number;
- During the 2021 bat surveys, no bats were observed entering or emerging from any buildings, trees or walls. The 2022 bat surveys observed two common pipistrelle bats re-entering the Southern Boundary Wall on the 3<sup>rd</sup> August. A single common pipistrelle was observed re-entering the tree T75 (located along the Lower Richmond Road boundary of the Site) on the 17<sup>th</sup> August and a soprano pipistrelle was recorded re-entering the tree on 31<sup>st</sup> August. These roosts are assessed to be day roosts (low numbers);

- Whilst no roosting bats were recorded during the surveys in 2021 or 2022 at Building B9 (the Maltings), given this was identified as a bat roost site in 2019, as a precautionary approach, building B9 the Maltings is still assessed to be a soprano pipistrelle day roost (low numbers);
- Owing to the supplementary activity and automated bat surveys in 2022, the geographical value for foraging and commuting bats has been upgraded too **Regional**.
- As a result of the peregrine falcon and breeding bird surveys undertaken at the Site in 2022, peregrine falcons are likely to be absent from the Site. Given peregrine falcons were recorded in 2021, the effects on peregrine falcons have however still been assessed as having an **Adverse** direct effect at a **Significant** level and a **not significant** indirect effect during the Works. With the provision of a peregrine falcon nest box on building 9 (the Maltings), the likely indirect and direct effects on peregrine falcons once the Development is completed would be **not significant**. These effects are the same as previously assessed in the March 2022 ES;
- The Works have the potential to directly impact upon the bat roost present within the building B9 (the Maltings) and the southern boundary wall, which could result in the destruction of the roosts. The bat roost at tree T75 will be retained and will have a multi-use games area (MUGA) and soft landscaping constructed in proximity. The likely significant direct effect to roosting bats would be **Adverse** and at a **Significant** level (as previously reported in the March 2022 ES);
- Prior to the potential destruction of the roosts, the roost present within building B9 the Maltings, the southern boundary wall, and at the retained roost at tree T75, also has the potential to be indirectly affected by the Works, through effects such as noise, dust arisings, vibration and lighting. The likely significant indirect effect to roosting bats would be **Adverse** and at a **Significant** level (as previously reported in the March 2022 ES);
- Once completed, no direct effects on the retained roost at tree T75 would occur, and the bat roosts present within building B9 (the Maltings) and at the southern boundary wall would have been removed. Artificial bat roosting habitats will be provided resulting in a **beneficial** direct effect on roosting bats (as previously reported in the March 2022 ES); and
- The completed development is not anticipated to have an indirect impact on roosting bats as the bat roosts present within building B9 the Maltings and at the southern boundary wall would have been removed. In addition, and whilst the bat roost at tree T75 is to be retained it will have a MUGA and soft landscaping constructed in proximity and an increase in disturbance levels are not anticipated. Tree T75 is currently located to the south of Watney's Sports Ground and is already subjected to human disturbance (similar to that a MUGA will produce) and is directly adjacent to Lower Richmond Road (A3003) that is already subjected to high levels of traffic disturbance and street lighting. Any additional lighting for the MUGA will however be controlled by the indicative lighting strategy as detailed above to ensure no significant increase of existing levels at the roost site or along the treeline. With the provision of new roosting features, the likely indirect effect would be **not significant** (as previously reported in the March 2022 ES).

Following further assessment, it has been concluded that the findings of the Environmental Impact Assessment (EIA) presented in the March 2022 Environmental Statement (ES) in support of the Hybrid Planning Application (22/0900/OUT) & Detailed Application School (22/0902/FUL) remain unchanged as a result of the further protected species surveys (other than the change in geographical value for foraging and commuting bats). The March 2022 ES (as amended by the August 2022 ES

Statement of Conformity) remains valid. Resultantly, no further updates, over and above the updated Ecology Chapter, appendices and figures, are required to the March 2022 ES or the ES Non-technical Summary.

The Statement of Conformity has been lawfully prepared in accordance with The Town and Country Planning (Environmental Impact Assessment) Regulations 2017<sup>1</sup> (as amended<sup>2</sup>) and, as such, this letter is to demonstrate our finding that no significant residual effects arise from the further protected species surveys to support the planning applications (ref: 22/0900/OUT and 22/0902/FUL).

Should you have any queries or wish to discuss the conclusions of this letter, please do not hesitate to contact the undersigned.

Yours sincerely



Steve Brindle  
Associate Director  
For and On Behalf of Waterman Infrastructure & Environment Ltd

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<sup>1</sup> HMSO, 2017. Town and Country Planning (Environmental Impact Assessment) Regulations (SI 2017/571).

<sup>2</sup> HMSO, 2018. The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018.