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THE HALL SCHOOL
UPDATE PRELIMINARY ECOLOGICAL APPRAISAL

RAMBOLL

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1. EXECUTUVE SUMMARY

Ramboll Environment and Health UK Limited ('Ramboll') was commissioned by The Hall School Charitable Trust ('the Client') to undertake an Update Preliminary Ecological Appraisal of land at The Hall Senior School, 23 Crossfield Road, NW3 4NU. The Consented Development proposals included the demolition of sections of the lone building on site and erection of new four storey building to provide additional accommodation for the existing school use (Class D1).

The content of this report is based on the findings of an extended Phase 1 Habitat survey undertaken on 06 February 2019 and an internal building inspection carried out on 19 February 2019.

The application site comprised one building complex and an AstroTurf playing pitch together with smaller areas of hardstanding, introduced shrub and scattered trees. The habitats present on the application site were considered to be of Negligible to Site level importance and are therefore not a significant constraint to development.

The application site is likely to support common species of bird, and recommendations are made concerning this species.

Mitigation and enhancement measures have been recommended to reduce negative effects on biodiversity and to increase the ecological value of the application site when the development is completed. These measures include the timing of vegetation clearance works and/or to avoid impacts on nesting birds. Other measures include introducing a landscape planting plan which includes native species or species with a known value to wildlife, and the provision of bat and bird boxes. In addition, recommendations are made regarding the retention of the mature London plane tree within the playground.

No further ecological surveys are recommended.

2. INTRODUCTION

2.1 Background

Ramboll Environment and Health UK Limited ('Ramboll') was commissioned by The Hall School Charitable Trust ('the Client') to provide an Update Preliminary Ecological Appraisal (PEA) of land at The Hall Senior School, 23 Crossfield Road, NW3 4NU ('the application site').

Ramboll previously carried out an ecological survey of the application site in 2016, with the subsequent report[1] ('the 2016 Ecology Report') used to support the planning application associated with the application site. Said planning permission was granted in July 2018 (ref. 2016/6319/P) to extend and refurbish the buildings on the application site in order to increase the school's capacity (the 'consented scheme').

This report has been produced to support a Section 73 minor material amendment application ('S73 application'), which seeks to make a number of changes to the consented scheme. The proposed development description for the S73 application is as follows:

'Variation of Condition 2 of planning permission 2016/6319/P dated 5th July 2018 for the demolition of the 'Centenary' and 'Wathen Hall' buildings and erection of new four storey building with glazed link to original school building, two storey rear extension with external terrace and enlarged basement replacing the existing Wathen Hall, and enlargement of rear roof storey and insertion of three dormer windows to old school building, all in association with providing additional accommodation for the existing school use (Class D1); NAMELY, to allow minor material design amendments including a reduction in the size of the approved basement, removal of external staircase from Wathen Hall and associated minor external alterations'.

As part of this submission, an update ecological assessment was deemed necessary. This was due to both the length of time that had passed since the original survey as well as to account for the updated proposals.

The application site is located at OS grid reference TQ 26932 84533, within the administrative boundary of the London Borough of Camden, as shown in Figure 2.1.

[1] Ramboll ENVIRON, 2016. The Hall School, London Borough of Camden - Ecology Report. Ref: UK11-23583

Figure 2.1: Application site Location

2.2 Objectives

The aims of this report are to:

- provide an Update PEA of the application site, carried out in accordance with guidance provided by CIEEM, 2017[2]. PEA is the term used to describe a rapid assessment of the ecological features present, or potentially present, within a site and its Zone of Influence (ZoI). The ZoI is the area over which ecological features may be affected by the biophysical changes caused by the proposed development and its associated activities. The structure and content of the report is based on current ecological report writing guidance (CIEEM 2017[3] and BSI Standards Institution 2013[4]); and
- assess the proposed development in the context of the updated baseline and assess whether the recommendations for further survey, enhancement and mitigation as detailed in the 2016

[2] CIEEM (2017). Guidelines for Preliminary Ecological Appraisal, Second Edition. Chartered Institute of Ecology and Environmental Management (CIEEM), Winchester
[3] CIEEM (2017) Guidelines on Ecological Report Writing. Chartered Institute of Ecology and Environmental Management, Winchester.
[4] BSI Standards Institution (2013). BS 42020:2013. Biodiversity – Code of Practice for Planning and Development. BSI Standards Limited, London.

Ecology Report remain valid and sufficient, or whether additional further survey, enhancement and mitigation is required.

The specific objectives of this report are to:

- identify designated nature conservation sites located either within the application site or the ZoI of the proposed development;
- assess the potential for the application site and the ZoI of the proposed development to support populations of protected species or species of nature conservation importance[5];
- record the main habitats and features of ecological interest on the application site;
- assess the overall ecological importance of the application site;
- provide recommendations for any additional further surveys (if required); and
- provide preliminary recommendations for the protection and enhancement of the application site's ecological features.

The report is supported by the following appendices:

- Appendix 1: Figures;
- Appendix 2: Legislation and Policy Context; and
- Appendix 3: Application site Photographs.

This report is considered suitable to inform the S73 application currently being sought by the Client.

2.3 Consented Development

The Consented Development proposals included the demolition of the 'Centenary' and 'Wathan Hall' (Buildings 1c and 1d respectively on Appendix 1, Figure 1) and erection of new four storey building with glazed link to original school building, two storey rear extension with external terrace and enlarged basement replacing the existing Wathan Hall, and enlargement of rear roof storey and insertion of three dormer windows to old school building, all in association with providing additional accommodation for the existing school use (Class D1).

2.4 Proposed Development

The proposed development will be largely the same as that which was consented, with the following differences:

- Omit the new sub-basement but retain the proposed lift/staircore, boys changing room and boys WC;
- Retain Wathen Hall (substantially) and, within the same built envelope as the extant planning permission, create a new single storey extension on top at Upper Ground level, still with a green roof;
- Continue to re-build the Centenary Building;
- Scale back or postpone other works in the Old School building e.g. Art room extension and new studio space;

[5] The following species are considered to be of nature conservation importance: i) listed as a national priority for conservation (such as those listed as habitats and species of principal importance for the conservation of biodiversity under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006; ii) listed as a local priority for conservation, for example in the relevant local Biodiversity Action Plan (BAP); iii) assessed as a threatened or near-threatened species according to International Union for the Conservation of Nature (IUCN) red list criteria; iv) Red or Amber Listed species in national Species of Conservation Concern assessments; v) listed as a Nationally Rare or Nationally Scarce species (e.g. in one of the Species Status Project reviews) or a Nationally Notable species where a more recent assessment of the taxonomic group has not yet been undertaken; and/or vi) endemic to a country or geographic location (including endemic sub-species, phenotypes, or cultural behaviours of a population that are unique to a particular place).

- Omit the 'wraparound' staircase around the large tree in the playground; and
- Create temporary accommodation "on site" in the playground and Middle School car park to avoid full off-site relocation.

2.5 Legislation and Policy Framework

Various legislation and planning policies refer to the protection of wildlife. These are summarised in Appendix 2 but should not to be regarded as a definitive legal opinion. When dealing with individual cases, the full texts of the relevant documents should be consulted, and legal advice obtained if necessary.

3. METHODOLOGY

The methodology consists of the following parts:

- a desk study;
- an extended Phase 1 Habitat survey;
- a daytime inspection of buildings and trees for bats; and
- an assessment of important ecological features.

3.1 Desk Study

The purpose of the desk study was to collect existing baseline data about the application site and the ZoI such as the location of designated sites or other natural features of potential ecological value such as woodland and ponds. The following within the ZoI have been considered:

- all statutory designated sites up to 1 km from the application site, including Special Areas of Conservation (SAC), Special Protection Areas (SPA), National Nature Reserves (NNR), Sites of Special Scientific Interest (SSSI) and Local Nature Reserves (LNR);
- non-statutory designated sites: Sites of Importance for Nature Conservation (SINCs) up to 1 km from the application site; and
- records of protected species up to 1 km from the application site.

Greenspace Information for Greater London (GiGL) was contacted to provide details of designated sites and protected species within 1 km of the application site (Report Ref. 12657, dated 13 February 2019). Due to data ownership restrictions in the reproduction of the GiGL report it is not appended to this PEA, but the information provided is summarised in the relevant sections. In addition, the Multi Agency Geographic Information for the Countryside (MAGIC) website[6] was searched for supplementary information on statutory sites. This included a search for European Protected Species licences issued within 1 km of the application site. Supplementary information on the application site and its surroundings were obtained from aerial images available from Google™ Earth.

3.2 Extended Phase 1 Habitat Survey

An extended Phase 1 Habitat survey of the application site was undertaken by Chris Savage MCIEEM on 06 February 2019. Chris has a BSc in Ecology and an MSc in Ecological Assessment and has worked professionally as a consultant ecologist since 2013. The weather during the survey period was cold and dry with little wind.

The survey involved a site walkover and preliminary assessment of key habitats, land use and ecological features. The main habitats present were recorded using standard Phase 1 Habitat survey methodology as described in the Handbook for Phase 1 Habitat Survey (JNCC, 2010[7]). In addition to general habitat classification, a list was compiled of observed plant species (using the nomenclature of Stace, 2010[8], with common and Latin names referred to in the first instance after which only the common names are used). The abundance of each species was estimated for each habitat respectively using standard 'DAFOR' codes:

- D = Dominant.
- A = Abundant.
- F = Frequent.

[6] www.magic.gov.uk, accessed 13 February 2019
[7] Joint Nature Conservation Committee (JNCC) (2010). Handbook for Phase 1 Habitat survey – a technique for environmental audit. JNCC Peterborough
[8] Stace, C. (2010) New Flora of the British Isles 3rd Edition. Cambridge University Press

- O = Occasional.
- R = Rare.

The application site was assessed for its potential to support protected and notable species such as reptiles and bats, and was inspected for signs of any invasive plant species subject to legal controls. This was in order to identify potential ecological constraints and to guide recommendations for further survey requirements for these species.

3.3 Daytime Building and Tree Inspection for Bats

A daytime external inspection of buildings and trees was completed at the same time as the extended Phase 1 Habitat survey by Ramboll ecologist, Chris Savage.

The internal inspection of the lofts spaces within Building 1 was carried out on 19 February 2019 by Chris Savage. Chris is licensed to survey bats and holds a Natural England licence (NE) Level 2 Survey Licence (licence number: 2017-32224-CLS-CLS). The exterior elevations and all internal voids and attic spaces of the application site's buildings and trees were visually inspected for field evidence of roosting bats including droppings, urine staining, feeding remains and potential roosting points. In accordance with the guidance outlined in Bat Surveys for Professional Ecologists: Good Practice Guidelines 3rd edition (Collins, 2016[9]) each building was assessed for its potential to support bats. The following building types and features are considered to be of particular suitability to support roosting bats:

- Buildings of pre-20th or early 20th century construction;
- Agricultural buildings of brick, stone or timber construction;
- Large and complicated roof void(s) with unobstructed flying spaces;
- Large (>20 cm) roof timbers with mortise joints, cracks and holes;
- Entrances into buildings for bats to fly through;
- Poorly maintained buildings such that they provide access points for bats into roofs, walls, bridges, but at the same time not being too cool and draughty;
- Roof warmed by the sun e.g. south facing;
- Weatherboarding and/or hanging tiles with gaps;
- Undisturbed building roofs and structures;
- Buildings and built structures in proximity to each other providing a variety of roosting opportunities throughout the year; and
- Buildings and built structures close to good foraging habitat e.g. mature trees, parkland, woodland or wetland.

The following tree features are considered of particular suitability to support roosting bats:

- natural holes;
- woodpecker holes;
- cracks / splits in major limbs;
- loose bark;
- bat, bird or mammal boxes;
- partially detached large-stemmed ivy; and
- other hollows / cavities.

Each building, structure and tree has been classified into a category dependent on the presence of features suitable to support bat roosts. The categories assigned were: Confirmed Roost, High,

[9] Collins, J. (2016). Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edition). Bat Conservation Trust (BCT)

Moderate, Low and Negligible Potential for use by bats. Table 3.1 below provides criteria for each of these categories. In addition, the suitability of the application site for foraging and commuting bats was assessed.

Table 3.1: Building, Structure and Tree Bat Roost Potential Categories

Roost Potential	Description
Confirmed	A building, structure or tree that is confirmed to support a bat roost.
High	A building, structure or tree with one or more potential roost site that is obviously suitable for use by larger numbers of bats on a regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.
Moderate	A building, structure or tree with one or more potential roost site that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status.
Low	A building or structure with one or more potential roost site that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection and / or suitable surrounding habitat to be used on a regular basis or by a large number of bats (i.e. unlikely to be suitable for hibernation or maternity). Trees of sufficient size and age to contain potential roost features but with none seen from the ground or features seen with very limited roosting potential.
Negligible	Negligible habitat features likely to be used by roosting bats and bats very unlikely to be present.
Notes: Category descriptions drawn from Collins (2016)	

3.4 Assessment of Importance of Ecological Features

The importance of ecological features (i.e. designated sites, habitats and species) identified within the ZoI has been assessed using a scale that classifies ecological features within a defined geographic context in accordance with CIEEM guidelines (2018[10]). The classification uses recognised and published criteria (e.g. Ratcliffe, 1977[11], Wray *et al.* 2010[12]) where the habitats and application site were assessed in relation to their size, diversity, naturalness, rarity, fragility, typicalness, connectivity with surroundings, intrinsic value, recorded history and potential value. The following geographic frame of reference has been used for the application site:

- International Importance;
- National Importance (England);
- Regional Importance;
- Borough Importance (London Borough of Camden);
- Local Importance;
- Site Importance (limited to the application site boundary); and
- Negligible Importance.

A wide range of sources can be used to assign importance to ecological features, including legislation and policy. In the case of designated sites, their importance reflects the geographic context of the designation. For example, sites designated as SACs are recognised as being of importance at an International level. Ecological features not included in legislation and policy may

[10] CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Chartered Institute for Ecology and Environmental Management, Winchester.
[11] Ratcliffe, D. (1977) A Nature Conservation Review. Cambridge University Press
[12] Wray, S., Wells, D., Long, E. and Mitchell-Jones, T. (2010) Valuing Bats in Ecological Impact Assessment. In Practice, pp 23-25

also be assigned importance, due to, for example, local rarity or decline, or provision of a functional role for other ecological features. Professional judgement is used to assign such importance.

3.5 Limitations

The ecological assessment has been undertaken based on CIEEM's 2017 Guidelines for Preliminary Ecological Appraisal, with elements of 2018 Ecological Impact Assessment Guidelines, taking a proportionate approach to the level of survey effort and reporting required due to the small size and suburban nature of the application site.

It should be noted that availability and quality of the data obtained during desk studies is reliant on third party responses. This varies from region to region and for different species groups. Furthermore, the comprehensiveness of data often depends on the level of coverage, the expertise and experience of the recorder and the submission of records to the local recorder.

Not all areas of the loftspace within Building 1 were accessible at the time of the site visit. This was due to the presence of water tanks/pipework etc.

The extended Phase 1 Habitat survey provides a snapshot of ecological conditions and does not record plants or animals that may be present at the application site at different times of the year. The survey was undertaken during the optimum April to September Phase 1 Habitat survey period when plants are generally visible.

Ramboll is satisfied that this report represents a robust appraisal of the application site. If any action or development has not taken place on this land within twelve months of the date of this report, the findings of this survey should be reviewed by a suitably qualified ecologist and may need to be updated.

4. BASELINE CONDITIONS

4.1 Previous Baseline

The 2016 Ecology Report found that the application site contained a building and courtyard, together with small areas of introduced shrub planting and scattered trees.

A data search was not carried out to inform the 2016 Ecology Report, nor was an internal inspection of the building on application site included as part of that assessment.

4.2 Current Baseline

4.2.1 Landscape Context

The application site is within the urbanised locale of Hampstead, north London. It sits within a largely residential area and is bounded to the north, east and south by residential homes and to the west by Crossfield Road. Three hundred meters to the south-west of the application site lies the commercial centre of Hampstead, complete with rail station and other commercial buildings.

4.2.2 Designated Sites

Statutory Sites

One Local Nature Reserve (LNR) (Belsize Wood), was identified within the desk study as being present within 950 m to the north-east of the application site. No SPAs, SACs, SSSIs, National Nature Reserves NNRs were identified as present.

Non-Statutory Sites

GiGL identified seven Sites of Importance for Nature Conservation (SINCs) located within 1 km of the application site. These are listed in Table 4.1. No further designated sites are present within 1 km of the application site.

Table 4.1: Sites of Importance for Nature Conservation within 1 km of the application site

Name	Type	Location	Area (ha)	Reason for designation
Chalk Farm Embankment and Adelaid Nature Reserve	Borough Grade I	700 m to the south-east	0.9	Scattered trees, Scrub, Secondary woodland, Semi-improved neutral grassland, Tall herbs. Known to supports invertebrate assemblages.
Primrose Hill	Borough Grade II	700 m to the south-east	25.19	Amenity grassland, Hedge, Planted shrubbery, Scattered trees, Semi-improved neutral grassland, Tall herbs. Known to supports birds.
Green Triangle	Borough Grade II	750 m to the west	0.28	Amenity grassland, Planted shrubbery,

Table 4.1: Sites of Importance for Nature Conservation within 1 km of the application site				
				Pond/lake, Scattered trees, Secondary woodland, Tall herbs. Known to supports invertebrate assemblages.
Hampstead Green	Local	850 m to the north	0.24	Hedge, Scattered trees, Semi-improved neutral grassland, Tall herbs.
Belsize Wood Local Nature Reserve & Russell Nurseries Woodland Walk	Borough Grade I	900 m to the north-east	0.7	Ancient woodland, Pond/Lake, Scattered trees, Scrub, Secondary woodland, Tall herbs. Known to supports invertebrate assemblages.
Frognal Court Wood	Borough Grade II	900 m to the north-east	0.2	Woodland. Known to supports bird and invertebrate assemblages.
West Hampstead Railsides, Medley Orchard and Westbere Copse	Borough Grade I	1,000 m to the west	7.94	Orchard, Scattered trees, Scrub, Secondary woodland, Semi-improved neutral grassland, Tall herbs. Known to supports bird and invertebrate assemblages.

4.3 Habitats

The following descriptions of habitats should be read in conjunction with Appendix 1, Figure 1: Phase 1 Habitat Plan.

4.3.1 General application site Description

The application site is dominated by a building and other habitat (AstroTurf pitch) together with smaller areas of hardstanding, introduced shrub and scattered trees.

4.3.2 Buildings

There is a single building on the application site: Building 1. For the purposes of description, and to reflect the architectural difference, the building is described in four sections: Building Sections 1a-1d.

The building sections are of Negligible ecological importance in their own right but may support nesting birds and roosting bats. These issues are therefore discussed within this section.

All building sections are described below in Table 4.2 below.

Table 4.2: Buildings at the application site

Building Name	Description	Photo
Building Section 1a	Building Section 1a is the original school building, constructed in 1889. It is three storeys tall with an open gable and intersecting hip roof, covered in clay tiles. The roof appears to be in largely good condition with the exception of a number of missing and damaged tiles. Dormer windows are present, around which are areas of lifted lead flashing. The exterior walls of the building are constructed with redbrick and lack a cavity. They appear to be in a good state of repair with the exception of one area of damaged brickwork on the eastern façade. No soffits or hanging tiles are present. There are two loft voids present. Both are of similar construction and are 1.5 m high and feature a timber truss, and timber sarking. The voids are unfloored, insulated with yellow wool and have red-brick at the gable ends.	
Building Section 1b	Building Section 1b is a three-storey extension at the eastern gable end of Building 1. It is of similar construction in terms of roofing material and brick and appears to be in good condition structurally with the exception of two damaged/missing tiles. Building 1b is visible in the accompanying photograph as the differently coloured section to the left.	
Building Section 1c	Building Section 1c is part of the extension to the original building and comprises a flat two storey section that 'sits' inside Building 1a, and a flat three storey section that faces Crossfield Road. Although the roof sections are flat, there are three beehive hut style structures on top, made of lead, and functioning as office rooms. The brickwork on the façade is brick and appears to be in good condition. There are no soffits.	

Table 4.2: Buildings at the application site		
Building Section 1d	Building Section 1d is also part of the recent extension works and is a one storey section attached to Building Section 1c. It has a flat roof and functions as an indoor sports hall. The facades are brick and appear to be in good condition. There are no soffits.	

4.3.3 Astroturf

The second largest habitat identified consists of an artificial AstroTurf area. This habitat makes up a large pitch at the at the east of the application site and is used by the school as a playground by the school children.

Astroturf is of Negligible importance for wildlife.

4.3.4 Introduced Shrub

There are five small areas of introduced shrub on the application site. Three of these areas are located on the podium platform at the west of Building 1d and two more are present at the west of Building Section 1a between the school building and the and the adjacent roadway. All planting is confined to planter boxes. Species present include Japanese aralia *Fatsia japonica*, St. John's wort *Hypericum sp*., box *Buxus sempervirens*, and plum *Prunus sp*..

Introduced shrub is common habitat in London and the areas present on the application site are small, thus limiting their potential to support nesting birds. Instead, the value of this habitat would be limited to providing foraging resource for common invertebrates and based on this, the introduced shrub on the application site is considered to be of importance at Site level only.

4.3.5 Scattered Trees

There are two trees across the application site. The largest is a veteran London plane *Platanus x hispanica* at the east of the application site within the AstroTurf area. This tree's age is unknown, but it is believed by staff of the school to be approximately 90 years old. The second scattered tree is a semi-mature beech *Fagus sylvatica* at the north-west of the application site adjacent to introduced shrub habitat.

The mature London plane in the courtyard which, aside from its bat potential (addressed in Section 4.3 below) is a veteran tree and is therefore assessed as being of Local importance. The semi-mature beech is considered to be of Site importance only.

4.3.6 Invasive Species

No invasive species, subject to legal controls, were recorded on application site.

4.4 Species

4.4.1 Invertebrates

Data provided by the GiGL contains records of a number of invertebrate species identified within 1 km of the application site. This includes stag beetle *Lucanus cervus* and Jersey tiger moth *Euplagia quadripunctaria*, both Annex II species under the Conservation of Habitats and Species Regulations 2017. The data also includes records of numerous species listed as Species of Principal Importance (SPI) under the Natural Environment and Rural Communities (NERC) Act

2006, including the moths grey dagger *Acronicta psi* and small square-spot *Diarsia rubi*, both of which are also listed aa London Biodiversity Action Plan priority species.

The application site includes habitat in the form of introduced shrub and scattered trees which are suitable to support more common assemblages of invertebrates. The application site is unlikely to support significant populations of rare or protected invertebrates due to the lack of flowering species suitable for species such as butterflies, or dead/decaying wood. There is an abundance of more suitable habitat in the vicinity of the application site at Primrose Hill and Regents Park including broadleaved woodland, likely replete with a varied vegetative structure conducive to invertebrates; rough grassland, with rough edges suitable for a range of invertebrate species.

Based on the above, the application site is considered to be of Site level importance for use by common invertebrate assemblages.

4.4.2 Amphibians

Data records indicate the presence of common amphibians including common frog *Rana temporaria* and common toad *Bufo bufo* within 1 km of the application site. Rarer and more protected amphibians such as great crested newts *Triturus cristatus* do not appear in the data search.

There is no habitat on the application site suitable to support amphibians, be they common or rare.

Based on the above, the application site is considered to be of Negligible importance for amphibians.

4.4.3 Reptiles

The data records provided no records of reptiles within 1 km of the application site and there is no suitable habitat on the application site that could support reptiles.

Based on the above, the application site is considered to be of Negligible importance for reptiles.

4.4.4 Birds

GiGL records reveal a large number of bird species in proximity to the application site. This including six species listed as Annex I of the Birds Directive, including sandwich tern *Sterna sandvicensis* and osprey *Pandion haliaetus*, and well five species listed as Schedule 1 under the Wildlife and Countryside act 1981 (as amended), such as fieldfare *Turdus pilaris* and black redstart *Phoenicurus ochruros*. In addition, the data contains records of a number if specie listed as SPI and/or London BAP species such as house sparrow *Passer domesticus* reed bunting *Emberiza schoeniclus*.

The application site is unlikely to support large numbers of rare or notable species of bird. This is due to the fact that much of the application site is covered in building and AstroTurf with the bulk of the remaining limited to small areas of introduced shrub and two scattered trees. These habitats are not particularly valuable as either nesting or foraging habitat. Introduced shrub, would offer a limited resource for nesting and foraging birds. The building and scattered trees on the application site are also likely to support low numbers of common species for nesting purposes, while the application site as a whole may offer foraging potential for the same.

Based on the above, the application site is considered to be of Site level importance for use by common species of nesting and foraging bird.

4.4.5 Bats

The data search returned records of at least three bat species within 1 km of the application site: common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus* and noctule *Nyctalus noctula*. MagicMap identified one expired bat European Protected Species Licence (EPSL) within 1 km of the application site and no active licences within the same radius.

Building 1 contains four sections (Building Sections 1c, 1d, 1e and 1f), two of which (a and b) contain external features which could support roosting bats. These features include slipped/damaged/missing tiles, gaps under lead flashing, hole in brickwork.

Building 1a contains two separate loft spaces and an internal inspection of both did not identify any bats or signs of bats. The sarking appeared to be well sealed and in good condition, and no signs of light entering were identified; suggesting no/limited access/egress points available for bats to enter/exit the loft voids. There is also an abundance of spider webs present, further suggesting an absence of bats from with the void spaces.

Buildings 1a and 1b contain a small number of external features suitable to support bats. That said, no evidence of bats was identified on the application site either internally or externally; there is little connectivity to link the application site to suitable off-site habitat and the desk study returned relatively few records of bats within 1km. Building 1 (a-d) is therefore assessed as having Negligible potential to support roosting bats and Negligible potential to support hibernating bat, as are the two trees on the application site.

The application site contains minimal habitat suitable to support foraging bats and is also unlikely to function as a commuting corridor.

4.5 Assessment of Important of Ecological Features

Table 4.3 presents the ecological importance of habitats and species present on the application site, in accordance with CIEEM guidance. Species assessed as being unlikely to be present on the application site are not considered further in this assessment.

Table 4.3: Ecological Importance of Features Present on the application site (in accordance with CIEEM, 2018)

Feature	Ecological Importance	Rationale
Hardstanding	Negligible	Does not contribute to biodiversity value of the application site.
Astroturf	Negligible	Does not contribute to biodiversity value of the application site.
Introduced Shrub	Site	Contributes to biodiversity value of the application site, and provides potential foraging habitat for common invertebrates, birds and bats but value is unlikely to extend beyond the Site level.
Scattered Trees	Site to Local	The tree at the west of the application site is likely to be of importance at Site importance only. The mature London plane within the schools play pitch is likely to be of importance at a Local level due to its age, size and condition.
Invertebrates	Site Level	The application site is likely to support common invertebrates of value at the Site Level.

Table 4.3: Ecological Importance of Features Present on the application site (in accordance with CIEEM, 2018)		
Amphibians	Negligible	The application site is unlikely to support amphibians.
Reptiles	Negligible	The application site is unlikely to support reptiles.
Birds	Site Level	Buildings and scattered trees may be used by common nesting bird species.
Bats	Negligible	The application site is unlikely to support bats, either roosting or commuting/foraging.

5. ECOLOGICAL CONSTRAINTS AND RECOMMENDATIONS

5.1 Previously identified Ecological Constraints and Recommendations

The 2016 report identified the single ecological constraint on application site to be the potential for nesting birds. The report went on to make a number of recommendations for mitigation and enhancement, including:

- Timing vegetation clearance/pruning works to occur outside the bird breeding season;
- Provision of further landscape planting post-development to benefit invertebrates;
- Provision of bird boxes; and
- Provision of bat boxes.

5.2 Current Ecological Constraints and Recommendations.

This section collates the current information gained during the desk study and extended Phase 1 Habitat survey, presenting the ecological constraints and opportunities and making recommendations for mitigation and further surveys. It has been prepared in view of the proposed development of the application site.

5.2.1 Designated Sites

Due to the distance and lack of ecological connectivity of designated sites (statutory and non-statutory) from the application site, impacts arising from development are considered unlikely. Mitigation for designated designated sites is therefore not required.

5.2.2 Habitats

The proposed development works will include the loss of sections of Building 1 and the AstroTurf playing pitch, both habitats are of Negligible importance which therefore present no ecological constraints.

Approximately half of the introduced shrub on site will be removed. This habitat is listed at Site level of importance and is therefore addressed below.

Scattered trees, especially when mature, have a value not just in terms of their potential to support wildlife but also due to their intrinsic and landscape value. As per the proposed development for the application site, the mature London plane in the courtyard will be retained. Construction works in the vicinity of this tree to be retained could damage overhanging branches or roots, possibly leading to significant adverse impacts upon the tree (potentially premature death). Therefore, the retained tree will be protected during construction activities in accordance with BS 5837: 2012 'Trees in Relation to Design, Demolition and Construction', in order to reduce the possibility of any damage to both crown and roots of the trees.

The proposals as described should have no affect the beech tree at the west of Building 1 due to its distance from the construction activities.

5.2.3 Species

Invertebrates

Loss of vegetation would lead to loss of habitat suitable for use by common invertebrates, for which the application site is of Site level importance.

Further surveys for invertebrates are not considered necessary, although provision of landscape planting with known biodiversity value (including nectar-producing flowers), as well as green infrastructure would be of benefit to invertebrate species using the application site, mitigating for this loss of habitat in the medium term, once new habitats become established. Areas of bare

ground, piles of rubble and logs, as well as invertebrate boxes or 'bee hotels' would provide additional interest for invertebrates such as bees.

Birds

All wild birds are protected whilst nesting, with disturbance and destruction of active nests constituting an offence under the Wildlife and Countryside Act 1981 (as amended). Loss of building and vegetation would remove suitable nesting habitat for breeding birds. Were this to take place during the breeding season (March to August inclusive), there would be a risk that nests would be damaged or destroyed during the process. Proposed development works at the application site, including the removal of vegetation, should therefore take place between September and January. If this is not possible, a nesting bird check should be undertaken by an experienced ecologist prior to removal. If evidence of nesting birds is identified, work should stop and a suitable no-work buffer zone around the nest area should be installed, until such time as chicks have fledged. In addition, bird scarers could be installed across the application site including hawk eyes to help to prevent birds from nesting on the buildings on the application site, prior to demolition.

Bats

The application site contains one building: Building 1, which has Negligible potential to support roosting and hibernating bats. Removal of vegetation is unlikely to impact foraging and commuting bats as the application site contains minimal habitat to support foraging bats and is unlikely to function as a commuting corridor for the same reason.

5.2.4 Compensation

In order to comply with planning policy[13,14] to achieve no net loss of biodiversity, landscape planting should be included post-development to replace the loss of the introduced shrub. This would ideally take of the form of native planting or planting of vegetation with a known value to wildlife.

Consideration should be given to green infrastructure provision at the application site, such as a green wall, planters on the southern aspect of the building, or a green roof. Such provisions could enable BREEAM credits to be maximised if a BREEAM assessment is undertaken.

5.2.5 Enhancement

In order to comply with planning policy[15,16] to achieve a net gain where possible, additional biodiversity mitigation and enhancement measures will be introduced to the application site.

Enhancement for invertebrate species could be provided through provision of log piles, pebbles or insect boxes ('bug hotels') within the landscape planting. Additional enhancement for birds and bats could be provided through the inclusion of bird boxes (such as those suitable for house sparrow) and bat boxes attached to the building.

A native wildflower seed mix could be applied to any areas of grassland within the landscape planting, to provide an additional foraging resource for pollinating bees and other insects.

[13] Department for Communities and Local Government, 2018. National Planning Policy Framework (NPPF). London. HMSO
[14] Defra, 2011. Natural Environment White Paper. The natural choice: securing the value of nature https://www.gov.uk/government/publications/the-natural-choice-securing-the-value-of-nature
[15] Department for Communities and Local Government, 2018. National Planning Policy Framework (NPPF). London. HMSO
[16] Defra, 2011. Natural Environment White Paper. The natural choice: securing the value of nature https://www.gov.uk/government/publications/the-natural-choice-securing-the-value-of-nature

6. CONCLUSIONS

The 2016 Ecology Report identified the application site as having potential to support nesting birds only and made a number of recommendations for mitigation and enhancement.

The baseline conditions on the application site and the subsequent ecological constraints identified have not changed significantly between the original assessment used to inform the 2016 Ecology Report, and the current assessment produced in 2019. Therefore, the recommendations for the proposed development are largely similar to those as originally prescribed valid and are repeated below in Table 6.1. By undertaking the work in accordance with the recommendations in this report, the proposed development is likely to be in conformity with relevant planning policy and legislation relating to ecology.

No further survey is required.

Table 6.1 summarises the mitigation requirements for the proposed development.

Table 6.1: Summary of Recommendations

Receptor	**Recommendations**
Habitats	Root protection zones to be applied around any retained trees on or adjacent to the application site.
	Provision of landscape planting with native and non-native fruiting and nectar-producing species.
	Consider the provision of green infrastructure such as biodiverse roofs and green walls.
Birds	Demolition works to building and any clearance/pruning of any vegetation on site be undertaken between September and February, outside of the bird nesting season, or following checks by an experienced ecologist.
	Provision of bird boxes.
	Provision of habitat suitable for nesting and foraging birds though the incorporation of appropriate soft landscaping. This should include fruit producing species for food as well as well as dense shrub species and tree planting to provide nesting opportunities.
Bats	Provision of landscape planting and green infrastructure with native and non-native evening flowering plant species.
	Provision of bat boxes.

APPENDIX 1
FIGURES

Legend

Site Boundary

Phase1 Points

- Hole in brickwork
- Lifted lead flashing
- Missing or damaged roof tile
- Open drain pipe

Phase1 Polygons

- Scattered Trees
- J1.4 Introduced shrub
- J3.6 Buildings
- Hardstanding
- Original School Building
- Extension to School Building

Figure Title
Results of Phase 1 Habitat Survey

Project Name
The Hall Senior School, 23 Crossfield Rd, London NW3 4NU

Project Number	Figure No.
170000297	1
Date	**Prepared By**
February 2019	GM
Scale	**Issue**
1:250 @A3	1

Client
Hall School Charitable Trust

RAMBOLL

APPENDIX 2
RELEVANT LEGILSATION AND POLICY

Ecological features are protected under various United Kingdom (UK) and European legislative instruments. These are described below. European legislation is not included as it is incorporated in UK legislation by domestic provisions.

The Conservation of Habitats and Species Regulations, 2017

The Habitats Directive (Council Directive 92/43/EEC)[17] came into force in 1992 and provides for the creation of a network of protected wildlife areas across the European Union, known as 'Natura 2000'. The Natura 2000 network consists of Special Areas of Conservation (SACs) designated under the Habitats Directive and Special Protection Areas (SPAs) designated under the Birds Directive (Council Directive 79/409/EEC)[18]. These sites are part of a range of measures aimed at conserving important or threatened habitats and species.

The Conservation of Habitats and Species Regulations 2017[19] commonly known as 'the Habitats Regulations' transposes the Habitats Directive into national law and set out the provisions for the protection and management of species and habitats of European importance, including Natura 2000 sites. The 2017 bill consolidated all previous versions of the regulations and subsequent amendments since initial transposition, bringing them all under the single heading, and made a number of minor amendments. It extends to England and Wales, and to a limited extent Scotland and Northern Ireland. In Scotland, the Habitats Directive is transposed through a combination of the Habitats Regulations 2010 (in relation to reserved matters) and the Conservation (Natural Habitats &c.) Regulations 1994. The Conservation (Natural Habitats, &c) Regulations (Northern Ireland) 1995 (as amended) transposes the Habitats Directive in relation to Northern Ireland.

In addition to providing for the designation and protection of Natura 2000 sites, the Habitats Regulations provide strict protection for plant and animal species as European Protected Species. Derogations from prohibitions are transposed into the Habitats Regulations by way of a licensing regime that allows an otherwise unlawful act to be carried out lawfully for specified reasons and providing certain conditions are met. Under the Habitats Regulations, competent authorities have a general duty, in the exercise of any of their functions, to have regard to the Habitats Directive and Wild Birds Directive including in the granting of consents or authorisations. They may not authorise a plan or project that may adversely affect the integrity of a European site, with certain exceptions (considerations of overriding public interest).

The Countryside and Rights of Way Act 2000

The Countryside and Rights of Way Act 2000[20] primarily extends to England and Wales. It provides a new statutory right of access to the countryside and modernises the rights of way system, bringing into force stronger protection for both wildlife and countryside.

The Act is divided into five distinct sections, Part III is of relevance to ecology:

Part III - Nature Conservation and Wildlife Protection: The Act details a number of measures to promote and enhance wildlife conservation. These measures include improving protection for Sites of Special Scientific Interest (SSSIs) and increasing penalties for deliberate damage to SSSIs. Furthermore, the Act affords statutory protection to Ramsar Sites which are wetlands designated under the International Convention on Wetlands[21].

[17] European Commission (1992) Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora. European Commission, Brussels
[18] European Commission (1979) Council Directive 79/409/EEC on the conservation of wild birds, European Commission, Brussels
[19] Secretary of State (2017) The Conservation of Habitats and Species Regulations. Her Majesty's Stationery Office (HMSO)
[20] Secretary of State (2000) The Countryside and Rights of Way Act. HMSO
[21] United Nations Educational, Scientific and Cultural Organization (UNESCO) (1971) Convention on Wetlands of International Importance especially as Waterfowl Habitat, as amended in 1982 and 1987. Ramsar, Iran Published in Paris, 1994

Wildlife and Countryside Act 1981, as Amended in Quinquennial Review and by the Countryside and Rights of Way Act 2000 and the Natural Environment and Rural Communities Act 2006

The Wildlife and Countryside Act 1981[22] forms the basis of much of the statutory wildlife protection in the UK. Part I deals with the protection of plants, birds and other animals and Part II deals with the designation of SSSIs.

This Act covers the following broad areas:

- Wildlife - listing endangered or rare species in need of protection and creating offences for killing, disturbing or injuring such species. Additionally, the disturbance of any nesting bird during breeding season is also noted as an offence, with further protection for species listed on Schedule 1. Measures for preventing the establishment of non-native plant and animal species as listed on Schedule 9 are also provided;
- Nature Conservation - protecting those Sites which are National Nature Reserves (NNR) and SSSI;
- Public Rights of Way - placing a duty on the local authority (normally the County Council) to maintain a definitive map of footpaths and rights of way. It also requires that landowners ensure that footpaths and rights of way are continually accessible; and
- Miscellaneous General Provisions.

The Act is enforced by Local Authorities.

Natural Environment and Rural Communities (NERC) Act 2006

Under the NERC Act 2006[23] Section 40, public authorities must show regard for conserving biodiversity in all their actions. Public authorities should consider how wildlife or land may be affected in all the decisions that they make. The commitment to the biodiversity duty must be measured by public authorities.

NERC Act 2006 Section 41 requires the Secretary of State to publish a list of habitats and species that are of principal importance for the conservation of biodiversity in England.

Protection of Badgers Act 1992

The Protection of Badgers Act 1992[24] consolidated previous legislation relating specifically to badgers. This makes it an offence to kill, injure or take a badger, or to damage or interfere with a sett unless a licence is obtained from a statutory authority.

Biodiversity Action Plans

In 1994, Government produced the UK Biodiversity Action Plan (BAP)[25], a national strategy for the conservation of biodiversity. This led to the creation of the UK Biodiversity Steering Group, which has listed 1,150 Species Action Plans (SAPs) and 65Habitat Action Plans (HAPs). Regional and District/Borough BAPs apply the UK BAP at a local level.

From July 2012, the UK Post-2010 Biodiversity Framework[26] succeeds the UK BAP and Conserving Biodiversity - the UK Approach. This is as a result of a change in strategic thinking following the publication of the Convention on Biological Diversity's Strategic Plan for Biodiversity

[22] Secretary of State (1981) Wildlife and Countryside Act. HMSO
[23] Natural Environment and Rural Communities Act 2006. HMSO
[24] Secretary of State (1992) Protection of Badgers Act 1992. HMSO
[25] Her Majesty's Stationery Office, 1994. Biodiversity: The UK Action Plan. London
[26] JNCC and Defra (on behalf of the Four Countries' Biodiversity Group), 2012. UK Post-2010 Biodiversity Framework. July 2012. jncc.defra.gov.uk/pdf/UK_Post2010_Bio-Fwork.pdf

2011 - 2020 and its 20 'Aichi targets', at Nagoya, Japan in October 2010, and the launch of the new EU Biodiversity Strategy (EUBS) in May 2011.

The UK Post-2010 Biodiversity Framework constitutes the UK's response to these new 'Aichi' strategic goals and associated targets. The Framework recognises that most work which was previously carried out under the UK BAP is now focussed on the individual countries of the United Kingdom and Northern Ireland, and delivered through each countries' own strategies.

Following the publication of the new Framework, the UK BAP partnership no longer operates. However, many of the tools and resources originally developed under the UK BAP remain of use. The UK list of priority species has been used to help draw up statutory lists of priorities in England, Scotland, Wales and Northern Ireland. For England, this is in line with the NERC Act 2006 Section 41.

Biodiversity in the Planning Process

Administrative and policy guidance on the application of some of these statutory obligations is provided through relevant government policy guidance and advice. In England, this includes National Planning Policy Framework 2012, National Planning Practice Guidance, Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System, Biodiversity 2020 and Natural Environment White Paper The natural choice: securing the value of nature.

National Planning Policy Framework, 2018

The National Planning Policy Framework (NPPF)[27] adopted in 2018 sets out the Government's planning policies for England and how these are expected to be applied. The NPPF contains the following statements which are of relevance (not an exhaustive list, but including those of highest relevance):

- Section 15, paragraph 170 states that the planning system should contribute to and enhance the natural and local environment by: "minimising impacts on biodiversity and providing net gains in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;";
- Section 15, paragraph 174 states that planning applications should "promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity".
- Section 15, paragraph 174 states that - "To protect and enhance biodiversity and geodiversity, planning policies [local authorities] should: identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation"; and
- Section 15, paragraph 175 states that: "When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles: if significant harm 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". It also states that: "planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of ancient or veteran trees found outside ancient woodland, unless the need for, and benefits of, the

[27] Department for Communities and Local Government (2018) National Planning Policy Framework (NPPF). London. HMSO

development in that location clearly outweigh the loss and a suitable compensation strategy exists".

National Planning Practice Guidance, 2014

The National Planning Practice Guidance[28] is a web-based resource launched in March 2014. This guidance is divided into sections, of which Natural Environment: Biodiversity, Ecosystems and Green Infrastructure provides information on biodiversity issues within planning and guidance on where to find further information on biodiversity issues.

Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System.

This circular[29] provides administrative guidance on the application of the law relating to planning and nature conservation as it applies in England. It complements the national planning policy in the National Planning Policy Framework and the Planning Practice Guidance.

Natural Environment White Paper. The natural choice: securing the value of nature

The Natural Environment White Paper[30] outlines the government's vision for the natural environment over the next 50 years, shifting the emphasis to an integrated landscape-scale approach. It describes the actions that will be taken to deliver that goal.

Biodiversity 2020

The Biodiversity 2020[31] strategy for England builds on the Natural Environment White Paper and provides a comprehensive picture of how England is implementing its international and EU commitments. It sets out the strategic direction for biodiversity policy on land (including rivers and lakes) and at sea.

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.

It is anticipated that this will be delivered through:

- a more integrated large-scale approach to conservation on land and at sea;
- putting people at the heart of biodiversity policy;
- reducing environmental pressures; and
- improving our knowledge.

Local Planning Policy

London Biodiversity Action Plan, 2007

The overarching biodiversity action plan for the Greater London area is contained within the London BAP[32]. This sets out the priority habitats and species for the area and provides action

[28] Department for Communities and Local Government (2014) National Planning Practice Guidance: http://planningguidance.planningportal.gov.uk/

[29] Office of the Deputy Prime Minister (2005) Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System. https://www.gov.uk/government/publications/biodiversity-and-geological-conservation-circular-06-2005

[30] Defra (2011) Natural Environment White Paper. The natural choice: securing the value of nature https://www.gov.uk/government/publications/the-natural-choice-securing-the-value-of-nature

[31] Defra, 2011. Biodiversity 2020. https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services

[32] London Biodiversity Partnership (2007) London Biodiversity Action Plan [online]. Available at http://www.gigl.org.uk/about-gigl/londons-biodiversity-action-plan/ [Accessed 11th January 2017].

plans for these priority habitats and species, as listed in Table 8.1. Further important habitats and species do not currently have their own BAPs, these are also listed in Table 8.1.

London BAP Habitats	**London BAP Species**
Acid grassland	Bats
Chalk grassland	Black poplar
Heathland	House sparrow
Parks and urban greenspaces	Mistletoe
Private gardens	Reptiles
Reed beds	Sand martin
Rivers and streams	Stag beetle
Standing water	Water vole
Tidal Thames	**Other Important Species**
Wasteland	Black redstart
Woodland	Common dormouse
Other Important Habitats	Grey heron
Built structures	Otter
Meadows and pastures	Peregrine falcon
Fen, marsh and swamp	
Open landscapes with ancient/old trees	

The Mayor's Biodiversity Strategy, 2002

The Mayor's Biodiversity Strategy[33] aims to protect and enhance the natural habitats of London together with their species. It presents 14 detailed policies and 72 implementation proposals around a number of themes including the protection of biodiversity, blue ribbon network, managing wildlife habitats and connecting people to nature. Of note are the following proposals:

- Proposal 5: The Mayor will, and boroughs should, take account of the protection of wildlife habitats and biodiversity in the consideration of all planning applications; and
- Proposal 8: Where biodiversity assessments are submitted, the Mayor expects the options to be refined only after full investigation of the existing ecological conditions and consideration of the potential impacts of options.

Camden Local Plan

The Camden Local Plan[34] contains a number of polices related to the protection and enhancement on biodiversity. Notable policies include: *Policy A3 Biodiversity*

"The Council will protect and enhance sites of nature conservation and biodiversity. We will:

a. designate and protect nature conservation sites and safeguard protected and priority habitats and species;

b. grant permission for development unless it would directly or indirectly result in the loss or harm to a designated nature conservation site or adversely affect the status or population of priority habitats and species;

[33] Greater London Authority, 2002. Connecting with London's Nature - The Mayor's Biodiversity Strategy. London. GLA.
[34] Camden Local Plan, 2017. London Borough of Camden Council.

c. seek the protection of other features with nature conservation value, including gardens, wherever possible; Camden Local Plan | Protecting amenity 201

d. assess developments against their ability to realise benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development, proportionate to the scale of development proposed;

e. secure improvements to green corridors, particularly where a development scheme is adjacent to an existing corridor;

f. seek to improve opportunities to experience nature, in particular where such opportunities are lacking;

g. require the demolition and construction phase of development, including the movement of works vehicles, to be planned to avoid disturbance to habitats and species and ecologically sensitive areas, and the spread of invasive species;

h. secure management plans, where appropriate, to ensure that nature conservation objectives are met; and

i. work with The Royal Parks, The City of London Corporation, the London Wildlife Trust, friends of park groups and local nature conservation groups to protect and improve open spaces and nature conservation in Camden.

Trees and vegetation

The Council will protect, and seek to secure additional, trees and vegetation.

We will:

j. resist the loss of trees and vegetation of significant amenity, historic, cultural or ecological value including proposals which may threaten the continued wellbeing of such trees and vegetation;

k. require trees and vegetation which are to be retained to be satisfactorily protected during the demolition and construction phase of development in line with BS5837:2012 'Trees in relation to Design, Demolition and Construction' and positively integrated as part of the site layout;

l. expect replacement trees or vegetation to be provided where the loss of significant trees or vegetation or harm to the wellbeing of these trees and vegetation has been justified in the context of the proposed development;

m. expect developments to incorporate additional trees and vegetation

wherever possible."

APPENDIX 3
APPLICATION SITE PHOTOGRAPHS

Photo 1. Patio section joining Building 1c and 1d with introduced shrub planters visible.

Photo 2. Roof of Building 1c with 'beehive' office visible in foreground and roof of Building 1a visible in background.

Title:	Photographic Log	**Client:**	The Hall School Charitable Trust
Site:	Hall School	**Date:**	06 February 2019

Photo 3. London plane tree within astroturf playing pitch area. Tree is to be retained.

Photo 4. West facing elevation of Building 1a with areas of introduced shrub visible.

Title: Photographic Log	**Client:** The Hall School Charitable Trust
Site: Hall School	**Date:** 06 February 2019

Photo 5. First loft void within Building 1a

Photo 6. Second loft void within Building 1a

Title: Photographic Log	**Client:** The Hall School Charitable Trust
Site: Hall School	**Date:** 06 February 2019