



**WHITGIFT SCHOOL, CROYDON
ECOLOGICAL APPRAISAL**

**CROYDON COUNCIL PLANNING APPLICATION REFERENCE
21/00606/FUL**

PORTAKABIN LTD

MARCH 2021

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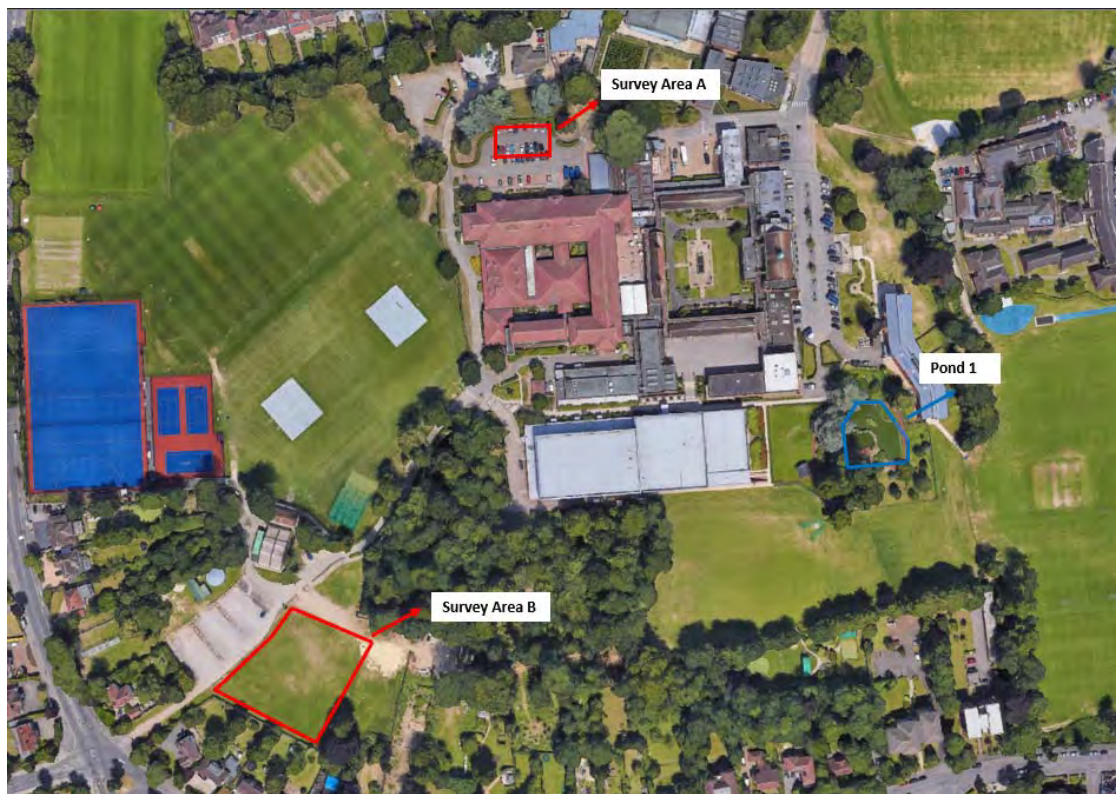
1 INTRODUCTION AND BACKGROUND

Surface Property (Surface) was commissioned by Portakabin Limited to undertake an ecological appraisal at two separate Survey Areas located within the grounds at Whitgift School, Croydon, London (henceforth referred to as the 'Site'). The Site is centre on National Grid Reference TQ 32233 64027.

This report is submitted to inform the retrospective planning application, Reference 21/00606/FUL, for a Portakabin building (consisting of eight classrooms) on an existing car park (Survey Area A) and the installation of a temporary car park for three years (Survey Area B), collectively referred to as the 'Development', in response to the ongoing COVID-19 pandemic. This report presents the ecological baseline conditions and potential ecological impacts from the Development, taking into account relevant planning policy and legislation. Further surveys and mitigation have been described, where applicable, in order to provide additional information for assessing potential ecological impacts and to inform recommendations to avoid such impacts.

Whilst a Preliminary Ecological Appraisal (PEA) was undertaken at the Site, CIEEM guidance sets out that a PEA report should not support a planning submission. Given the very limited ecological value of the Site, negligible impacts from the Development and no further recommendations for detailed species surveys, the use of an Ecological Appraisal has been deemed appropriate in this situation.

Figure 1: Survey Locations within the Site



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2 METHODS

2.1 Desk Study

Natural England's Multi Agency Geographic Information for the Countryside¹ (MAGIC) website was consulted to obtain information about any local or national statutory designated sites such as Sites of Special Scientific Interest (SSSI) within 1 km of the Site. A search for National Site Network sites, such as Special Areas of Conservation (SAC) or Special Protection Areas (SPA), within 5 km of the Site was also undertaken.

A desk study was undertaken to obtain local records of features of ecological interest from Greenspace Information for Greater London CIC. Records of non-statutory designated sites, such as Local Wildlife Sites (LWSs), and protected and notable species were requested from within 1 km of the Site.

2.2 Extended Phase 1 Habitat Survey

An Extended Phase 1 Habitat Survey of the Survey Areas was conducted on 3 March 2021. The survey classified and mapped habitats according to standard methods² and assessed their potential to support protected and notable species, including mammals, nesting birds, amphibians and reptiles. The survey was carried out following the Guidelines for Preliminary Ecological Appraisal³. Target Notes (TN) were recorded of features of particular ecological interest.

2.3 Bat Assessment

During the Extended Phase 1 Habitat Survey, a preliminary assessment of the potential of features to support bat roosts and suitable commuting or foraging habitats was conducted. The bat assessment work and recommendations followed guidelines produced by the Bat Conservation Trust (BCT)⁴. This initial bat assessment informs whether or not further surveys are required to assess the potential effects of the Development on bats.

A visual assessment of habitats to determine their potential to support commuting and foraging bats was undertaken. Based on these observations, the Site will be assigned a level of suitability.

Individual trees were assessed for their potential to support roosting bats and to identify Potential Roost Features (PRFs), and were classified according to their 'Roost Suitability'. Should evidence of bats be recorded or the features assessed to provide suitability for bats, then further surveys may be required.

2.4 Great Crested Newt Assessment

During the Extended Phase 1 Habitat Survey, a Habitat Suitability Index (HSI) assessment was carried out on waterbodies (where accessible) within 500 m of the Site. This followed a method based on Oldham R.S *et al* 2000⁵, resulting in a score that helps to determine the

¹ Multi Agency Geographic Information for Countryside (MAGIC). Available at <https://magic.defra.gov.uk/home.htm> [Accessed March 2021]

² JNCC (2010) *Handbook for Phase 1 habitat survey: a technique for environmental audit*. Nature Conservancy Council.

³ CIEEM (2017) *Guidelines for Preliminary Ecological Appraisal*, 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.

⁴ Collins, J. (ed.) (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (3rd ed.). The Bat Conservation Trust, London.

⁵ Oldham R.S, et al. (2000). *Evaluating the suitability of habitat for the Great Crested Newt (Triturus cristatus)*. *Herpetological Journal* 10 (4), 143-155.

suitability of a pond to support great crested newts (*Triturus cristatus*) (GCN) and the need for further, detailed surveys. The HSI scores and pond suitability categories are presented in Table 2.1.

Table 2.1 Categorisation of HSI Scores

HSI score	Pond suitability
< 0.5	Poor
0.5 – 0.59	Below average
0.6 – 0.69	Average
0.7 – 0.79	Good
> 0.8	Excellent

2.5 Badger Survey

As part of the Extended Phase 1 Habitat Survey, an inspection of the Survey Areas and surrounding habitat (approximately 30 m), where access was possible, was carried out to check for evidence of badger (*Meles meles*) activity, including:

- Presence of holes with evidence of badger, such as footprints, discarded hair, etc.;
- Presence of dung pits and latrines; and/or
- Other indications of badger activity, such as signs of foraging and footprints.

2.6 Ornithological Walkover

As part of the Extended Phase 1 Habitat Survey, a walkover of the Site and adjacent habitats (where access was possible) was carried out to determine the potential of the Site and surrounding area to support birds of conservation concern⁶.

2.7 Limitations and Assumptions

The survey was undertaken in optimal weather conditions by a suitably experienced ecologist who is an associate member of the Chartered Institute of Ecology and Environmental Management (CIEEM).

3 RESULTS

3.1 Desk Study

3.1.1 Designated Sites

3.1.1.1 Statutory

There are no National Site Network sites within 5 km of the Site, and no other national designated sites within 1 km.

⁶ Here defined as any species listed on one or more of the following: Schedule 1 of the Wildlife and Countryside Act 1981 (as amended), Annex I or the Birds Directive, Section 41 of the NERC Act (2006) and/or Red- or Amber-listed Birds of Conservation Concern (Eaton, *et al.* 2015)

3.1.1.2 Non-Statutory

There are five Sites of Importance for Natura Conservation (SINC) within 1 km of the Site, the closest being Whitgift School Wood, which is located within the Site. Further details of the non-statutory designated sites are presented in Table 3.1

Table 3.1: Designated sites and their proximity to the Site.

Site	Status	Distance and direction (km) from central grid reference of school	Description/reason for designation
Non-statutory designated sites			
Whitgift School Wood	SINC	0.1 km south (between the two Survey Areas, within school grounds)	A fine, small piece of woodland composed of beech (<i>Fagus sylvatica</i>), oak (<i>Quercus robur</i>), hornbeam (<i>Carpinus betulus</i>), ash (<i>Fraxinus excelsior</i>), sycamore (<i>Acer pseudoplatanus</i>) and lime (<i>Tilia x europaea</i>). The understory contains yew (<i>Taxus baccata</i>), field maple (<i>Acer campestre</i>) and holly (<i>Ilex aquifolium</i>), with ground flora ancient woodland indicators, such as wood melick (<i>Melica uniflora</i>) and bluebell (<i>Hyacinthoides non-scripta</i>).
Spices Yard Tree Belt	SINC	0.7 km north	No citation available.
Halling Grove Park	SINC	0.9 km south	A public park with mature trees, shrubberies and a small pond which supports the common blue damselfly (<i>Enallagma cyathigerum</i>) and Emperor dragonfly (<i>Anax imperator</i>). The grass in lower parts of the park has been allowed to grow tall and supports a good variety of common wild flowers, as well as butterflies, including gatekeeper (<i>Pyronia tithonus</i>) and holly blue (<i>Celastrina argiolus</i>). The park provides valuable access to nature in an area lacking accessible wildlife sites.
Duppas Hill	SINC	1.0 km north-west	First recreation ground in Croydon composed of amenity grassland, patches of acid grassland and scattered trees. A number of locally scarce plants are present including slender parsley piert (<i>Aphanes inexpecta</i>), birds-foot (<i>Ornithopus perpusillus</i>) and knotted clover (<i>Trifolium striatum</i>). The area is good for invertebrates with many butterfly species and stag beetles.

3.1.2 Protected Species

Numerous protected species records were returned within 1 km of the Site, dated from 2011 onwards, which were relevant to the habitats present and the Development. The species are protected under UK legislation or are listed under the NERC Act 2006 as species of principal importance, and detailed further in Table 3.2. No European Protected Species (EPS) licence applications were identified within 1 km of the Site.

Table 3.2. Protected and Priority Species within 1 km of the Site

Taxonomic group	Species	Total number of records	Date of most recent record	Distance and direction of most recent record from the central grid reference of school
Mammal	Daubenton's bat <i>(Myotis daubentonii)</i>	1	2013	0.2 km east
	Common pipistrelle <i>(Pipistrellus pipistrellus)</i>	12	2019	0.9 km east
	Soprano pipistrelle <i>(Pipistrellus pygmaeus)</i>	4	2016	0.6 km west
	Noctule bat <i>(Nyctalus noctula)</i>	3	2016	0.6 km west
	Serotine (<i>Eptesicus serotinus</i>)	4	2019	0.9 km east
	West European hedgehog <i>(Erinaceus europaeus)</i>	27	2019	0.6 km south-east
Amphibian	Common toad <i>(Bufo bufo)</i>	1	2016	0.9 km east
	Common frog <i>(Rana temporaria)</i>	3	2017	0.7 km north-west
Reptile	Slow-worm (<i>Anguis fragilis</i>)	2	2012	0.7 km north-west
Bird	Dunnock <i>(Prunella modularis)</i>	2	2019	0.9 km east
	Fieldfare <i>Turdus pilaris</i>	3	2017	0.6 km south-east
	Song Thrush <i>(Turdus philomelos)</i>	4	2019	0.6 km east
	Common Firecrest <i>Regulus ignicapilla</i>	1	2015	0.5 km south-east
	Brambling <i>Fringilla montifringilla</i>	9	2017	0.5 km south-east

Taxonomic group	Species	Total number of records	Date of most recent record	Distance and direction of most recent record from the central grid reference of school
	Lesser Spotted Woodpecker <i>Dryobates minor</i>	9	2012	0.6 km south-east
	Kestrel <i>Falco tinnunculus</i>	15	2013	0.5 km south-east

3.1.3 Priority Habitats

No priority habitats are present within or adjacent to the Survey Areas, however there is an area of deciduous woodland, Whitgift School Wood, located within the school grounds. This woodland is located 115m to the south of Survey Area A and is located adjacent to Survey Area B. Two further areas of deciduous woodland are located within 1 km of the Site. There are no other priority habitats within 1 km of the Site.

3.2 Site Description

The Site is situated within South Croydon, London, and is located within densely urbanised surrounds, although the Site itself is located in historical parkland. Survey Area A is located to the north-west of the main School Infrastructure and is within an existing hardstanding car park.

Survey Area B is located to the south-west of the School grounds and is located within an area of amenity grassland and surrounded by areas of hardstanding and residential housing (to the south and west). Figures 2 and 3, Appendix B, present the Phase 1 habitats for each Survey Area.

3.3 Phase 1 Habitats

Scientific names are excluded from plant species names in the following sections and only the common names are used. A full list of species recorded, including scientific names, is provided in Appendix C.

3.3.1 Survey Area A

3.3.1.1 Hardstanding and Built Structure

The planning application boundary comprised only hardstanding and was an existing car park of concrete surface. The Portakabin classroom building had been installed entirely on the hardstanding surface. The building was double-storey, flat-roofed, and composed of metal (Photographs 1 - 3).

3.3.1.2 Scattered Coniferous Trees

Several mature scattered coniferous tree species were located adjacent to Survey Area A. These trees were situated within an area of amenity grassland (Photographs 4 - 5).

3.3.1.3 *Introduced Shrub*

A well-managed privet hedge was located immediately adjacent to the area of hardstanding and Portakabin building (Photograph 4).

3.3.1.4 *Amenity Grassland*

An area of amenity grassland was located north of the survey area. The amenity grass was well-maintained, with a sward height of approximately 10 cm. Species in the sward included: perennial rye-grass, common daisy, white clover, dandelion, ribwort plantain and herb-robert (Photograph 5).

3.3.2 **Survey Area B**

3.3.2.1 *Built-up Areas*

The majority of the planning application boundary comprised of the Cap Trac temporary car park matting, described as build-up area on Figure 3 (Photographs 6 -8).

3.3.2.2 *Amenity Grassland*

Amenity grassland was present within the planning application boundary and to the east of the survey area. The Cap Trac temporary matting had been installed on amenity grassland (Photographs 7 – 8).

The amenity grass was well-maintained, with a sward height of approximately 10-15cm. Species in the sward included perennial rye-grass, common daisy, red dead-nettle, yarrow, fleabane *sp.* And Speedwell *sp.* (Photographs 11).

3.3.2.3 *Scattered Broadleaved Trees*

Several semi-mature and mature scattered broadleaved trees were present on the south-east boundary of the Survey Area. Species included sweet chestnut, sycamore and beech (Photographs 9 – 10)

3.3.2.4 *Bare Ground and hardstanding*

An area of bare ground was located on the northern boundary of the survey area (Photograph 6). This was approximately 10 m in width and used as an access track to a maintenance yard in the wider Site surrounds.

An existing concrete access road was present on the eastern boundary of the Survey Area. Beyond the road, a hardstanding car park was present.

3.4 **Protected Species**

3.4.1 **Bats**

The desk study returned 51 records of four species of bats within 1 km of the Site. The closest record was a Daubenton's Bat, recorded in 2013, located approximately 0.1 km east of the Site.

3.4.1.1 Roosts

Although, mature and semi-mature trees were located on the boundaries of Survey Areas A and B, no PRFs were recorded. Trees in close proximity to the Survey Areas were therefore assessed as having 'Negligible' potential to support roosting bats.

3.4.1.2 Habitats

Both Survey Areas offer limited foraging and commuting habitat suitable for bats and were considered to have Negligible potential to support foraging and commuting bats in isolation.

In the wider Site surrounds, located within the School grounds, woodland, scattered trees and large areas of amenity grassland are present offering Low-Moderate potential to support foraging and commuting bats. These habitats have connectivity to habitats located off-site.

3.4.2 Amphibians

One waterbody was present with 500 m of the Survey Areas (Figure 1). A Habitat Suitability Index (HSI) assessment was carried out and the results are presented in Table 3.3 and Appendix E.

Table 3.3. Habitat Suitability Index of Waterbody

Pond Reference	Grid Reference	HSI Score	Habitat Suitability
Pond 1	TQ 32368 63938	0.36	Poor

The open, short-sward amenity grassland within the Survey Areas provided poor quality terrestrial habitat for amphibians. The frequent disturbance of vehicles and pedestrians utilising the Survey Areas, and the limited habitat connectivity between the Survey Areas and the waterbody, were considered unfavourable to dispersing GCN (and other amphibians) and had negligible potential to support amphibians.

The desk study returned four records of two species of amphibians, common frog and common toad. The closest record was common frog, recorded in 2017, located approximately 0.7 km north-west of the Site.

3.4.3 Reptiles

The short sward amenity grassland within the Survey Areas was considered unsuitable to support foraging, commuting or sheltering reptiles. No potential hibernacula was present within either Survey Area. Given the nature of the Survey Areas, (existing hardstanding and area of short amenity), it is considered extremely unlikely that reptiles will be present on site.

The desk study returned two records of slow worm, the closest record, from 2012, was located approximately 0.7 km to the north-west.

3.4.4 Badger

No signs of badger were recorded within the Survey Areas and there is limited habitat present to support foraging or sett construction. Habitats within the wider surrounds, such as the woodland located within the School grounds, has potential to support foraging and commuting badgers or relatively undisturbed habitat for sett construction.

The desk study returned no records of badger within 1 km of the Site.

3.4.5 Birds

The scattered trees and ornamental shrubs may provide opportunities for nesting birds. At the time of the walkover survey, no nests were identified within trees in either Survey Area. The amenity grassland and areas of hardstanding provide negligible foraging and nesting habitats for birds.

The desk study returned 117 records of 24 species, the closest record, from 2017, was of a Brambling located 0.5 km to the south-east

4 DISCUSSION, FURTHER SURVEY REQUIREMENTS AND MITIGATION

4.1 Designated Sites

4.1.1 Statutory Designated Sites

There are no national statutory designated sites within 5 km of the Site. Impacts to statutory sites are therefore not considered further in this assessment.

4.1.2 Non-Statutory Designated Sites

There are four non-statutory Sites of Importance for Nature Conservation (SINC) within 1 km of the Site, the closest of which is Whitgift School Wood, located within the Site. This SINC is located 115 m to the south of Survey Area A and is located adjacent to Survey Area B. Whitgift School Wood is of importance due to its ground flora which comprises ancient woodland indicators such as wood melick and bluebell.

Due to the small scale, localised nature and minimal disturbance associated with the Development, it is considered highly unlikely that there will be any adverse effects to the ecological features associated with Whitgift School Wood SINC and no further recommendations are made.

All other non-statutory designated sites are considered to have no ecological connectivity to the Site and will not be impacted by the Development.

4.2 Habitats

The Development will not impact any habitats of value within the Survey Areas such as scattered trees. The Development will only impact areas of amenity grassland and/or hardstanding, and the effects of this will be minor.

4.3 Species

4.3.1 Bats

4.3.1.1 Trees

No trees with bat roosting potential were identified and therefore no further surveys or assessments of trees are recommended.

4.3.1.2 Habitats

Both Survey Areas were assessed as having negligible potential to support roosting and commuting bats, in isolation, and no further bat activity surveys are recommended.

In the wider Site surrounds, the woodland and scattered trees provide Low-Moderate potential to support foraging and commuting bats. These habitats have connectivity to habitats located off-site.

Due to the localised nature of the Development, it is considered highly unlikely that foraging and commuting bats within the Site will be adversely impacted by the Development. However, precautionary mitigation measures are outlined to minimise any potential disturbance.

4.3.1.3 Lighting and Disturbance

Lighting can adversely affect invertebrates and bats (as well as other animal species). New lighting should be designed in line with good practice⁷ to ensure the Site is able to provide continued undisturbed foraging and commuting habitats for bats. Should lighting be required, the following approach will be followed, if compatible with security and Health and Safety requirements:

- Motion-sensitive security lighting will be installed and floodlighting avoided;
- Avoidance of lighting with ultra-violet (UV) components in areas where lighting is required for public safety purposes. UV light is particularly disruptive to bat behaviour;
- Use of flat-glass protectors on luminaires to help reduce light spill above angles greater than 70° from the vertical plane; and
- Avoidance of light spill on to surrounding habitats by using accessories such as shields, louvres, hoods and cowls.

4.3.2 Amphibians

The waterbody located within 500 m was assessed as having Poor suitability to support GCN. There were no further waterbodies located within 500m of the Site. GCN are therefore considered to be absent from the Site.

The waterbody was also isolated from the two Survey Areas by large areas of hardstanding and buildings, and it is considered unlikely that amphibians would disperse into the two Survey Areas. Due to the small scale and localised nature of the works, impacts to amphibians are considered negligible. No further surveys or mitigation are recommended.

4.3.3 Reptiles

The short-sward amenity grassland and hardstanding are considered unsuitable to support reptiles. Due to the small scale and localised nature of the works, impacts to amphibians are considered negligible. No further surveys or mitigation are recommended.

4.3.4 Badgers

No evidence of badger was recorded. The Survey Areas offer limited potential to support foraging, commuting badgers and have negligible potential for sett construction. Due to the small scale and localised nature of the works, impacts to amphibians are considered negligible. No further surveys or mitigation are recommended.

⁷ Bat Conservation Trust (2018) *Bats and Artificial Lighting in the UK: Bats and the Built Environment Series* [online] Available at <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

4.3.5 Birds

The scattered trees recorded adjacent to both Survey Areas provide suitable nesting habitat for nesting birds. No habitats of value to nesting birds will be impacted by the Development. No further surveys or mitigation are recommended.

5 CONCLUSIONS

No further ecological survey work is required to inform the assessment of impacts and mitigation. Advice and guidance relating to bats and lighting has been provided to minimise potential impacts to bats within the wider Site surrounds.

Low value habitats, such as amenity grassland and hardstanding, are considered to have limited ecological value or potential to support protected and/or notable species. Due to the small scale and localised nature of the works, it is considered unlikely that the Development will adversely impact ecological features, and no further surveys or mitigation are required.

APPENDIX A – PLANNING POLICY AND LEGISLATION ENGLAND

The Wildlife & Countryside Act 1981 (as amended)

The Wildlife and Countryside Act 1981, as amended by the Countryside and Rights of Way Act (CROW) 2000 and the Natural Environment and Rural Communities Act (NERC) 2006, consolidates and amends existing national legislation to implement the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) and Council Directive 79/409/EEC on the Conservation of Wild Birds (Birds Directive)¹¹, making it an offence to:

- Intentionally kill, injure or take any wild bird or their eggs or nests (with certain exceptions) and disturb any bird species listed under Schedule 1 to the Act, or its dependent young while it is nesting;
- Intentionally kill, injure or take any wild animal listed under Schedule 5 to the Act; intentionally or recklessly damage, destroy or obstruct any place used for shelter or protection by any wild animal listed under Schedule 5 to the Act; intentionally or recklessly disturb certain Schedule 5 animal species while they occupy a place used for shelter or protection; and
- Pick or uproot any wild plant listed under Schedule 8 of the Act. Schedule 9, Part II of the Act also lists many species for which it is an offence to plant, or otherwise cause to grow, in the wild. Any material containing Japanese knotweed is also identified as controlled waste under the Environment Protection Act 1990¹² and must be disposed of properly at licenced landfill according to the Environmental Protection Act (Duty of Care) Regulations 1991¹³.

The Conservation of Habitats and Species Regulations 2017 (as amended)

The Conservation of Habitats and Species Regulations 2017¹⁴ (the 'Habitat Regulations'), as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019¹⁵, establish the requirements for protecting sites that are internationally important for threatened habitats and species – the National Site Network – and thus the requirement for a 'Habitat Regulations Assessment' of plans or developments with potential to affect them.

The Habitat Regulations also establish the strict protection of some species – European Protected Species – and make it an offence to deliberately capture, kill or disturb certain

⁸ Legislation.gov.uk *Wildlife and Countryside Act 1981* [online] Available from: https://www.legislation.gov.uk/ukpga/1981/69/pdfs/ukpga_19810069_en.pdf [Accessed February 2021]

⁹ Legislation.gov.uk *The Countryside and Rights of Way Act 2000* [online] Available from: <http://www.legislation.gov.uk/ukpga/2000/37/contents> [Accessed February 2021]

¹⁰ Legislation.gov.uk *Natural Environment and Rural Communities Act 2006* [online] Available from: <https://www.legislation.gov.uk/ukpga/2006/16/contents> [Accessed February 2021]

¹¹ EUR Lex: Access to European Law. *Birds Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds* [online] Available from: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32009L0147> [Accessed February 2021]

¹² Legislation.gov.uk *Environmental Protection Act 1990* [online] Available from: <http://www.legislation.gov.uk/ukpga/1990/43/contents> [Accessed February 2021]

¹³ Legislation.gov.uk *Environmental Protection Act 1991* [online] Available from: <http://www.legislation.gov.uk/uksi/1991/2839/made> [Accessed February 2021]

¹⁴ The Conservation of Habitats and Species Regulations 2017 [online] Available from: <https://www.legislation.gov.uk/uksi/2017/1012/contents/made> [Accessed February 2021]

¹⁵ The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 [online] Available from: <https://www.legislation.gov.uk/ukdsi/2019/9780111179512/contents> [Accessed February 2021]

wild animals, and to damage or destroy a breeding site or resting place of such an animal (even if the animal is not present at the time).

Natural Environment & Rural Communities (NERC) Act 2006

The NERC Act 2006¹⁰ places a duty on local planning authorities to have due regard for biodiversity and nature conservation during the course of their operations, and thus ensures that biodiversity is a key consideration in the planning process.

Protection of Badgers Act 1992

Badgers receive strict protection under the Protection of Badgers Act 1992¹⁶, which prohibits the taking, injuring, selling, possessing or killing of badgers and makes it an offence to ill-treat any badger, damage, destroy, disturb or cause a dog to enter a badger sett. The 1992 Act defines a badger sett as *“any structure or place, which displays signs indicating current use by a badger”*.

National Planning Policy Framework 2019

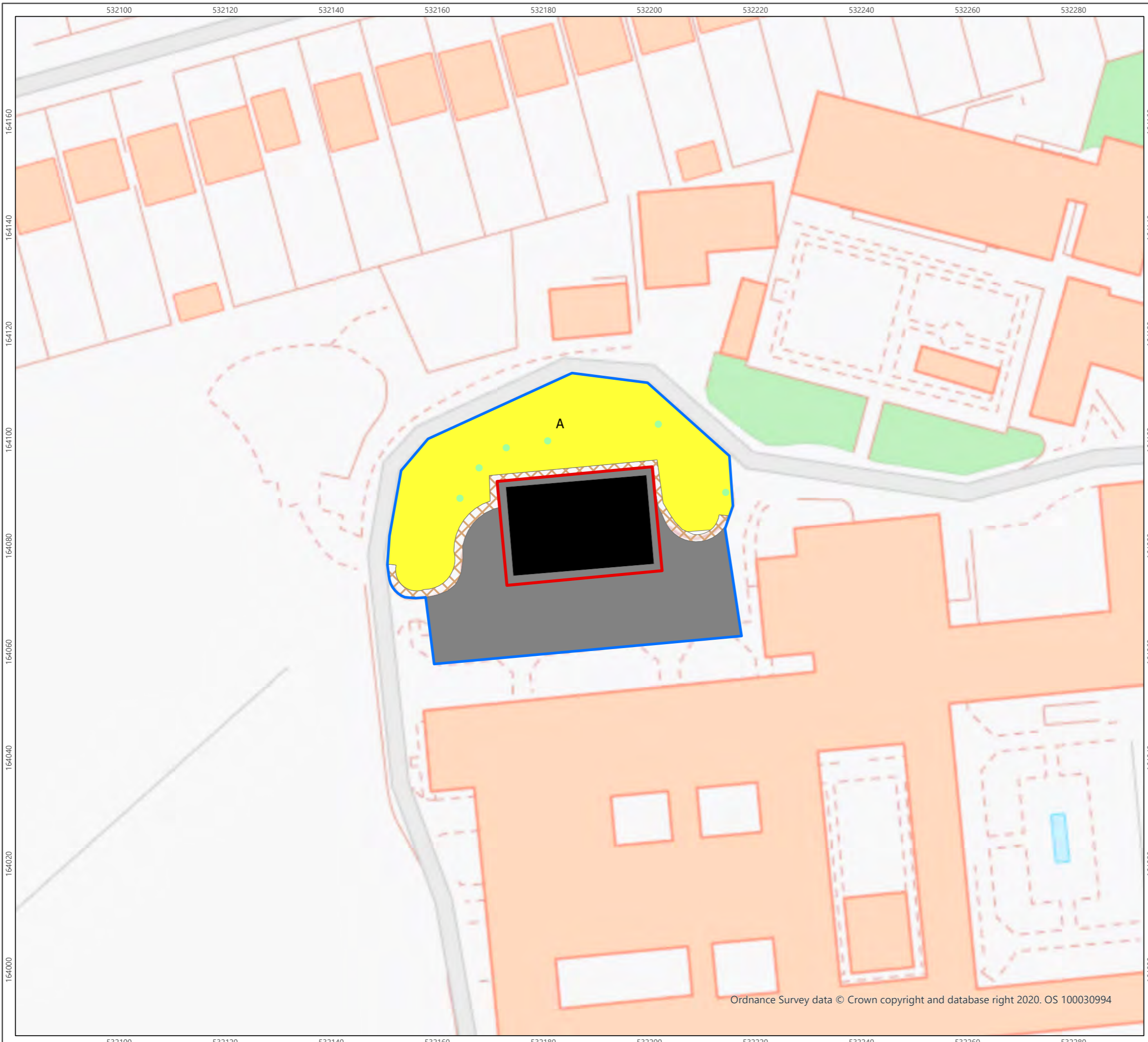
The National Planning Policy Framework (NPPF) 2019¹⁹ sets out the Government's requirement for the planning system in England and in doing so establishes framework within which local planning authorities can develop their own planning policies. The NPPF explicitly addresses the conservation and enhancement of the natural environment, including biodiversity, through paragraphs 174–177.

Biodiversity Action Plans

The UK Biodiversity Action Plan (UKBAP) was developed to fulfil the Rio Convention on Biological Diversity in 1992, to which the UK is a signatory. The UK Post-2010 Biodiversity Framework' now (as of July 2012) succeeds the UKBAP, although the UKBAP priority species and habitats are retained through the NERC Act. Regional and local BAPs have also been organised to develop plans for species/habitats of nature conservation importance at regional and local levels.

¹⁶ Legislation.gov.uk *Protection of Badgers Act 1992* [online] Available from: <https://www.legislation.gov.uk/ukpga/1992/51/contents> [Accessed February 2021]

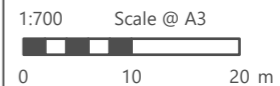
APPENDIX B – FIGURES



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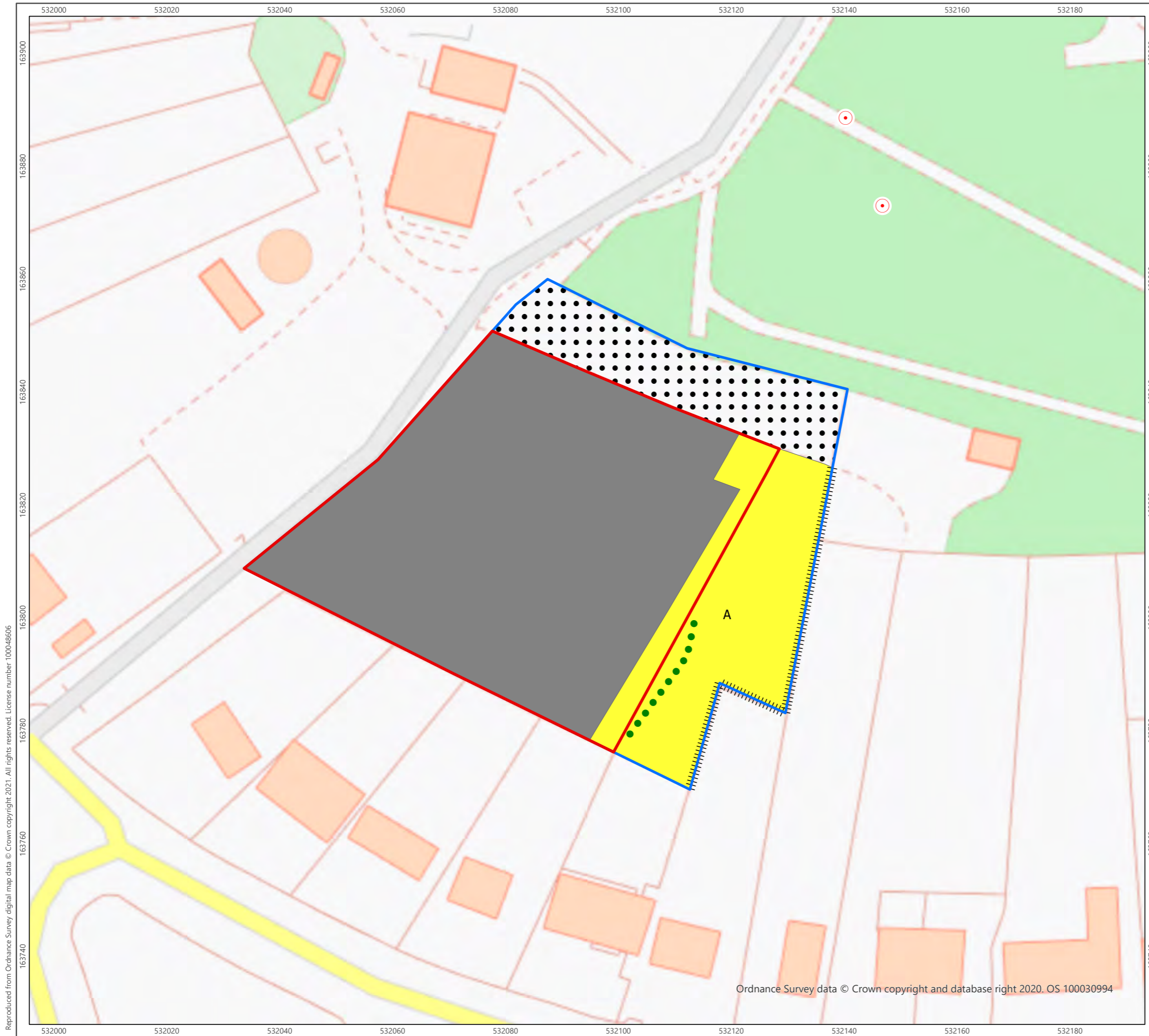
- Planning Boundary
- Survey Areas
- Coniferous parkland/scattered trees
- A Cultivated/disturbed land - amenity grassland
- Introduced shrub
- Built-up areas
- Buildings



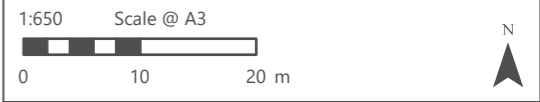
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Checked By: SC and MJ	Date: 15/03/2021

**Survey Area A -
Phase 1 Habitat Survey Results**
Figure 2

**Ecological Appraisal
Whitgift School, Croydon**



- Planning Boundary
- Survey Areas
- A Cultivated/disturbed land - amenity grassland
- Built-up areas
- Bare ground
- ● ● Broadleaved Parkland/scattered trees
- Fence
- ⊙ Target Note



Produced By: GC	Ref: 51442-REP-012
Checked By: SC and MJ	Date: 15/03/2021

**Survey Area B -
Phase 1 Habitat Survey Results**
Figure 3

**Ecological Appraisal
Whitgift School, Croydon**

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APPENDIX C – PLANT SPECIES LIST

List of plant species recorded during the Extended Phase 1 Habitat Survey

Common Name	Scientific Name
Beech	<i>Fagus sylvatica</i>
Fleabane <i>sp.</i>	<i>Pulicaria sp.</i>
Common Daisy	<i>Bellis perennis</i>
Dandelion	<i>Taraxacum officinale</i> agg.
Herb-Robert	<i>Geranium robertianum</i>
Perennial Rye-grass	<i>Lolium perenne</i>
Privet	<i>Ligustrum ovalifolium</i>
Red Dead-nettle	<i>Lamium purpureum</i>
Ribwort plantain	<i>Plantago lanceolata</i>
Sweet Chestnut	<i>Castanea sativa</i>
Sycamore	<i>Acer pseudoplatanus</i>
White clover	<i>Trifolium repens</i>
Yarrow	<i>Achillea millefolium</i>

APPENDIX D – PHOTOGRAPHS

Photographs taken during the Extended Phase 1 Habitat Survey

	
<p>Photograph 1: Survey Area A – Portakabin building installed on hardstanding, with privet hedge in surrounds.</p>	<p>Photograph 2: Survey Area A – Portakabin building installed on hardstanding.</p>
	
<p>Photograph 3: Survey Area A – Portakabin building installed on hardstanding.</p>	<p>Photograph 4: Survey Area A – Scattered coniferous trees and privet hedge in immediate surrounds.</p>
	
<p>Photograph 5: Survey Area A – Scattered coniferous trees, privet hedge and amenity grassland in immediate surrounds.</p>	<p>Photograph 6: Survey Area B – Bare Ground and Cap Trac temporary car park matting.</p>

<p>Photograph 7: Bare Ground and Cap Trac temporary car park matting.</p>	<p>Photograph 8: Amenity grassland and Cap Trac temporary car park matting.</p>
<p>Photograph 9: Amenity grassland, scattered trees and Cap Trac temporary car park matting.</p>	<p>Photograph 10: Photograph 9: Amenity grassland, scattered trees and Cap Trac temporary car park matting.</p>
<p>Photograph 11: Amenity grassland and Cap Trac temporary car park matting.</p>	

APPENDIX E – HABITAT SUITABILITY INDEX (HSI) RESULTS FOR OFF-SITE WATERBODIES
Pond 1

HSI Parameter	HSI Number	HSI Score
Location	S1	1
Pond Area	S2	0.95
Pond Drying	S3	0.9
Water Quality	S4	0.67
Shade	S5	1
Fowl	S6	0.01
Fish	S7	0.67
Ponds	S8	0.1
Terrestrial	S9	0.33
Macrophytes	S10	0.3
Total HSI Score		0.36