

A large background image showing a vibrant green field of grass. The image is heavily blurred, creating a bokeh effect with many out-of-focus circular light spots in shades of green and white. The top of the image transitions into a light blue and white bokeh pattern.

ST CATHERINE'S SCHOOL, TWICKENHAM

Ecological Appraisal

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APPENDICES

Appendix A	Proposed Development
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ABBREVIATIONS

BAP	Biodiversity Action Plan
CIEEM	Chartered Institute of Ecology and Environmental Management
EclA	Ecological Impact Assessment
IEF	Important Ecological Features
LNR	Local Nature Reserve
LWS	Local Wildlife Site
MAGIC	Multi-Agency Geographic Information for the Countryside

1. INTRODUCTION

- 1.1. Engain was commissioned by St Catherine's School to undertake an Ecological Appraisal (EA) of St Catherine's School, Twickenham (hereafter referred to as the 'site'), in connection with a full planning application for the demolition of the existing music block and extension to the adjacent building to be replaced with a new building (hereafter referred to as the 'Development'). The proposed development plans are provided in Appendix 1.
- 1.2. The scope of the appraisal was based on the Guidelines for Preliminary Ecological Appraisal, published in 2017 by Chartered Institute of Ecology and Environmental Management (CIEEM). This included a desk study to identify any notable or protected sites, habitats or species on or near to the site, a field survey to map and describe the habitats of the site, a review of existing ecological data and an assessment of the site's potential to support any notable or protected species.
- 1.3. The purpose of this report is to:
 - identify the likely ecological constraints associated with the Development;
 - identify any mitigation measures likely to be required, following the 'Mitigation Hierarchy';
and
 - identify opportunities to deliver ecological enhancement.
- 1.4. Further details of the survey and assessment methods are given in Section 4.

2. SITE LOCATION AND GENERAL DESCRIPTION

Site Location

2.1. The site is located within the grounds of St Catherine's School in Twickenham, in the borough of Richmond upon Thames. The ordnance survey grid reference for the centre of the site is TQ 1601 7278. The school is set within a built up residential area, and is approximately 100m from the banks of the River Thames.

General Description

2.2. The site is approximately 0.11ha in area and comprises classrooms and hardstanding making up the school's music block.

2.3. According to Soilscape, the soil at the site is 'freely draining slightly acid loamy soils'.

Figure 1, "Habitats Map"



3. LEGISLATION AND POLICY

Introduction

- 3.1. Wildlife in the UK is protected through European Directives, which are transposed into national legislation, supported by a range of national and local policy and guidance. Recent changes in planning policy and legislation have gone beyond site and species-specific protection to set broader goals for the conservation and enhancement of the natural environment and halting the continued loss of biodiversity in the UK.
- 3.2. Development can contribute to these goals through, for example, protecting the best features of a site and making them a valued part of the site's new use, and by incorporating enhancements to improve the site's value for wildlife.
- 3.3. The sections below provide a brief guide to the principal legislation and policy that sets the terms of reference for ecological appraisals in the UK. This is not intended to be a full description of all the obligations enacted by the various referenced documents, which should be referred to in their original form for the full details.
- 3.4. It is the responsibility of those involved with the development works to ensure that wildlife protection and nature conservation legislation is complied with at every stage of the project. Such legislation applies even in the absence of related planning conditions.

Relevant Legislation

- 3.5. The principal pieces of legislation relating to wildlife that are of relevance to this report are:
 - *The Environment Act 2021*
 - *EU Habitats Directive (1992)*;
 - *Conservation of Habitats and Species (Amendment) Regulations 2017*;
 - *The Wildlife and Countryside Act 1981 as amended (WCA)*; and
 - *The Natural Environment and Rural Communities (NERC) Act 2006*.

- 3.6. The main focus of much of this legislation is the protection of sites and species, the delineation of precisely how they are protected, and what actions would constitute an offence. This report provides guidance on whether any protected features are likely to be affected by the development proposal, and how offences under the legislation can be avoided.

Relevant Policy

- 3.7. Regional and local planning authorities are obliged to follow key principles to ensure that the potential impacts of planning decisions on biodiversity conservation are fully considered. *The National Planning Policy Framework* sets out the Government's policies for the protection and enhancement of biodiversity through the town and country planning system. This encourages the contribution to, and enhancement of, natural and local environments through minimising the impacts on biodiversity and providing net gains in biodiversity where possible.
- 3.8. Planning authorities are required to follow key principles in their consideration of potential impacts of planning decisions on biodiversity conservation. *Circular 06/05: Biodiversity and Geological Conservation* provides guidance on the application of the law relating to planning and nature conservation and complements the *National Planning Policy Framework*.
- 3.9. The presence of species protected under UK and European legislation are a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat. Ecological appraisals and protected species surveys are therefore designed to provide local planning authorities with the baseline information they require in order fully consider the potential ecological effects of a planning application.
- 3.10. *Biodiversity 2020: A strategy for England's wildlife and ecosystem services*, provides the *UK Biodiversity Action Plan* and country level biodiversity strategies for England, based on the list of habitats and species listed under *The NERC Act 2006*.

Regional Planning Policy

- 3.11. The site is covered by the London Plan 2021 which is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth.
- 3.12. The following policy is relevant to this assessment:

Policy G6 Biodiversity and access to nature

B. In Boroughs, in developing Development Plans, should:

- 3. support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans*
- 4. seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context*

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

Local Planning Policy

London Borough of Richmond upon Thames Local Plan

3.13. The London Borough of Richmond upon Thames (LBoRT) Local Plan was adopted by the Council on 3 July 2018 and has one relevant policy to this assessment, Policy LP 15: Biodiversity, which encourages the protection and enhancement of species or habitats which are of local, regional or national priority. This can be done by the maximising the provision of soft landscaping, including trees, shrubs and other vegetation that supports the borough-wide Biodiversity Action Plan and deliver a net gain in biodiversity.

Richmond upon Thames Biodiversity Action Plan

3.14. Local biodiversity action plans give valuable information on local conservation priorities. The Richmond upon Thames Local Biodiversity Action Plan (2018) (LBAP) is the local biodiversity action plan relevant to this site and highlights the value of habitats found in the region. One of the core aims is to conserve and enhance the variety of habitats and species in the borough in particular those which are of international or national importance, are in decline locally, are characteristic to the borough and/or have particular public appeal, which can raise the profile of biodiversity. Relevant species and habitats listed in the LBAP comprise:

- Private gardens;
- House sparrows;

- Swifts; and
- Pollinators.

4. METHODOLOGY

Desk Study

- 4.1. Greenspace Information for Greater London (GiGL), provided by eCountability has provided records of notable sites, habitats and species in the last 10 years. The search area was set at a radius of 1km from the site boundary for protected and notable species (excluding bats) and 5km for bats.
- 4.2. Online resources were also used, including the UK government's online resource for geographic information about the natural environment (MAGIC Map). This and other resources were used to scope the habitat survey at an appropriate scale and level of detail. MAGIC maps and the previous ecology reports were checked to identify if there were any known or possible locations of rare and/or habitats of high nature conservation priority.

Habitat Survey

- 4.3. A habitats survey was conducted on the 30th of August 2022. The field survey method was based on the UK Habitats Classification (UK Habs) as per the UK Habs User Manual.
- 4.4. Considering the size of the site and the nature of variation in habitats across the site, the appropriate scale of mapping was determined to be a fine scale MMU, meaning no areas of habitats less than 25m² or 5m in length if a linear feature need to be recorded.
- 4.5. The Primary Habitats were mapped using the professional edition of the hierarchy, at a minimum of a Level 4 habitat using the UK Habs Habitat Definitions as a guide. Once a Primary Habitat was assigned, a Secondary Code was added to further define the habitat type. Habitats are described with reference to their dominant and constituent species, and their UK Habs codes are given in the relevant sections. In some cases, secondary codes are referred to where there is sufficient variation in the habitat to warrant their use.
- 4.6. Any obvious signs of invasive species listed on *Schedule 9 of The Wildlife and Countryside Act 1981* such as Japanese knotweed (*Reynoutria japonica*), Himalayan balsam (*Impatiens grandiflora*) and giant hogweed (*Heracleum mantegazianum*).

Preliminary Roost Assessment

- 4.7. On the 30th of August 2022, an experienced ecologist undertook a ground-level Preliminary Roost Assessment (PRA) of the buildings on site. The methodology of the PRA followed the Bat Conservation Trust (BCT) Bat Surveys: Good Practice Guidelines (Collins, 2016) and the Joint Nature Conservation Committee (JNCC) Bat Workers' Manual (Mitchell-Jones & McLeish, 2004).
- 4.8. The buildings were inspected visually internally and externally, using binoculars during daylight hours for potential roosting features (PRFs) such as broken tiles, lifted lead flashing and gaps in the soffits and any evidence of previous or current usage by bats. This included searching for evidence of bats such as urine or oil stains and droppings.
- 4.9. Based on the results of the PRA, the buildings were assigned a bat roosting potential rating of either:
- Known / confirmed roost
 - High;
 - Moderate;
 - Low; and
 - Negligible.

Evaluation for Protected Species

- 4.10. Considering the site location, context and the habitats it contains, the following protected species are considered in this report:
- Bats;
 - Nesting birds; and
 - Terrestrial invertebrates.

4.11. The site is not suitable for badgers (*Meles meles*), reptiles, great crested newt (*Triturus cristatus*), otters (*Lutra lutra*), water voles (*Arvicola amphibius*) or white-clawed crayfish (*Austropotamobius pallipes*) due to the lack of suitable terrestrial habitats and waterbodies including ditches and streams on and off the site. These species are not considered further in this report.

Zone of Influence

4.12. The Zone of Influence (Zoi) for a project is the area over which ecological features may be affected by biophysical changes as a result of the proposed project and associated activities. This is likely to extend beyond the project site, for example where there are ecological or hydrological links beyond the site boundaries.

4.13. Based on the scale and nature of the development, it has been assessed that the Zoi arising from these works is unlikely to be greater than 1km from the centre of the site. Therefore, these distances have been used to collect the ecological data search information.

4.14. The habitat survey area comprised primarily within the site. However, adjacent land was viewed where possible. As referenced in industry guidance, potential Important Ecological Features (IEFs) that are present or potentially present on and off the site which may be impacted by the proposed development have been considered.

Important Ecological Features

4.15. The relative nature conservation value of ecological features is assessed against published criteria wherever possible. The value of habitats in the UK is covered in a wide variety of literature, including Usher (1986) and Ratcliffe (1977). The habitats and species of principal importance for biodiversity in the UK are listed on *Section 41 of NERC Act 2006*.

4.16. The main criteria used in assessing IEFs are rarity, diversity, naturalness and extent. High importance is also attached to habitats that have not been subject to agricultural intensification, and which often depend on traditional forms of management, such as ancient semi-natural woodland, species-rich meadows and traditionally managed grasslands and moorlands.

4.17. Not all potential or confirmed IEFs within the Zol have the potential to be significantly affected by the development or legislation pertaining to them to be contravened. Therefore, where features are unlikely to be affected by the proposed development, or where any effects that impact IEFs are unlikely to be significant, for the reasons listed below, such features have been scoped out of the assessment:

- No pathway of effect has been identified, for example the feature is sufficient distance from the Site or there is the presence of a barrier between its location and the Site; or
- The feature is of insufficient biodiversity conservation value within the Zol, due to its quality, extent or population size.

4.18. At the EA stage, there maybe not enough data or information to assess whether an ecological feature is an IEF, in which case further surveys may be required to allow a robust assessment to be undertaken at a later stage. Where this is the case, this is set out in this report.

Limitations

4.19. Engain cannot verify the accuracy of third-party information.

4.20. The field survey is not definitive and represents a snapshot of the ecological status of a site. Furthermore, data records help to provide a historical context, however the absence of evidence of a species does not prove that it does not use the site.

4.21. The site was freely accessible with no impeded areas.

5. RESULTS

Desk Study

Statutory Designated Sites

- 5.1. This site is not subject to any statutory designations. Ham Lands Local Nature Reserve (LNR) is the only statutory site, located approximately 180m east of the site, on the opposite side of the Thames.

Non-Statutory Designated Sites

- 5.2. This site is not within a non-statutory designated wildlife site. However, the site is within 1km of five non-statutory sites, the closest being the River Thames, which is designated as a Site of Metropolitan Importance for Nature Conservation (SINC).

Habitats

- 5.3. During the field survey, the only habitats recorded on site comprised two buildings (primary habitat code u1b5) and the associated hardstanding providing pedestrian access. Adjacent to the site's southern boundary there are several small trees located within a raised planter, and a building, known as the 'Lodge' which adjoins Building B2. Whilst these trees are outside the site's redline boundary they are within the potential Zol and therefore discussed further below.

Building B1

- 5.4. Building B1 comprised the main music block (Photo 1). It is a single storey, of brick construction, with a mansard roof (i.e. hipped with a flat roof), which was tiled on the hip sections and bitumen roof felt on the flat sections (Photo 2).
- 5.5. When inside, it was possible to view the top of the mansard, indicating a limited roof void, if any (Photo 3).

Photo 1, "Building B1"



Photo 2, "Roof of B1"



Photo 3, "Inside B1"



Building B2

5.6. Building B2 is a small flat roofed building (Photo 4). It is also of brick construction with the roof covered in bitumen felt (Photo 5).

Photo 4, "Building B2"



Photo 5, "Roof of Building B2"



Photo 6, "Inside B2"



The Lodge

- 5.7. The Lodge is a building which adjoins to Building B2 (Photo 6). It is constructed from red brick and whitewashed render with decorative half-timbering. It has a hipped, clay tiled roof however, the roof void has been converted into office space.

Photo 7, "The Lodge"



Invasive species

Photo 8, "Roof of the Lodge"



- 5.8. No invasive species were recorded during the survey.

Protected and Notable Species

Bats

- 5.9. The data search returned a total of 286 records of nine species of bats within 1 km of the site, with the majority for pipistrelle species (120). There is one approved European Protected Species License (EPSL) for bats in MAGIC within 1km, for a day roost for brown long-eared bats (*Plecotus auritus*), common pipistrelle (*Pipistrellus pipistrellus*) and soprano pipistrelles (*Pipistrellus pygmaeus*).
- 5.10. There was no evidence of roosting bats internally or externally of Building B1, B2 or the Lodge. There are no potential roosting features in any of the buildings as they are all in excellent condition i.e. no cracks or crevices within the brick work, tiles or lead flashing. All of the buildings have **negligible** potential for roosting bats.
- 5.11. The habitat on and adjacent to the site offers extremely limited opportunities for commuting and foraging bats due to the general lack of vegetation. The trees immediately adjacent to the site would offer some limited opportunities for opportunistic, light tolerant foraging bats such as common pipistrelles. It is much more likely that should bats be present in the local area, they would be using the nearby River Thames instead of the school site.

Birds

- 5.12. The data search returned numerous records for protected and notable bird species, with the most relevant records being for swift (*Apus apus*), herring gull (*Larus argentatus*), house sparrow (*Passer domesticus*) and starling (*Sturnus vulgaris*).
- 5.13. No nesting birds were identified during the survey and bird deterrent measures were observed on the Lodge. Given Building B1 and B2 have flat roofs, it is possible they could be used by nesting gulls or pigeons. There were few opportunities for other species given the shape and design of the buildings (i.e. their lack of cracks and crevices).
- 5.14. There is no vegetation on site; however the adjacent trees may offer nesting habitat for common species of bird.

Terrestrial invertebrates

- 5.15. Several records for terrestrial invertebrates were returned in the data search with stag beetle (*Lucanus cervus*) being of most relevance due to its local priority.

5.16. The site itself is of extremely limited ecological value to terrestrial invertebrates given the lack of vegetation on site; however the adjacent trees may offer habitat for common species.

6. EVALUATION AND RECOMMENDATIONS

- 6.1. There are no ecology receptors within the project's potential Zol that would constitute Important Ecological Features.
- 6.2. The ecological features in **Table 1** have been scoped out of further assessment Measures in line with the mitigation hierarchy are also included. Any legislative requirements relating to these ecological features, if required, are further detailed in **Table 2**.

Table 1, "Ecological Features to be Scoped Out of the Assessment"

Ecological Feature	Rationale for Scoping Out
Designated sites	<p>The site is at a sufficient distance from the nearest statutory and non-statutory designated site that no effects would occur.</p> <p>No significant impacts are anticipated because of the development.</p>
Habitats (including adjacent)	<p>All habitats on site have low conservation value.</p> <p>It is recommended that tree protection measures will be implemented to prevent any accidental damage of the adjacent trees</p> <p>No significant impacts are anticipated because of the development.</p> <p>The soft landscaping proposals will include plants offering opportunities for pollinators and a green wall.</p>
Bats	<p>The site offers negligible opportunities for roosting bats and only extremely limited opportunities for opportunistic commuting bats</p> <p>No significant impacts are anticipated because of the development.</p> <p>It is recommended that any proposed artificial lighting should be located and/or directed away from any bat boxes or proposed vegetation.</p> <p>Where possible, to reduce the impact of artificial lighting on wildlife, measures will be incorporated across the site using best practice principles (BCT and Institute of Lighting Professionals, 2018). Those measures include (but are not limited to) using warm white spectrum lights (<2700Kelvin), low-level downward directional luminaires and the use of LED bulbs.</p>

Ecological Feature	Rationale for Scoping Out
	<p>Enhancement measures for roosting bats in the form of two bat boxes, mounted on suitable mature trees. This will provide further roosting opportunities for crevice dwelling bats such as common pipistrelle. A suitable design includes 2F Schwegler Bat Box.</p> <p>Furthermore, the provision of soft landscaping within the scheme design will provide further foraging and commuting opportunities for bats on the site.</p>
Birds	<p>The bird assemblage using site is likely to be limited to common species or low numbers of notable species only and will not be of significant ecological value.</p> <p>No significant impacts are anticipated because of development.</p> <p>The development will include enhancement measures for birds. This will include the provision two bird boxes, both mounted on mature trees. A suitable design includes the 1B Nest Box. It should be mounted on trees out of direct sunlight, preferably east facing. This design targets species highlighted in local objectives such as the LBAP.</p> <p>Furthermore, the provision of soft landscaping within the scheme design will provide further foraging and nesting birds on the site.</p>
Terrestrial invertebrates	<p>The site offers almost no opportunities for terrestrial invertebrates due to the inherent lack of vegetation.</p> <p>No significant impacts are anticipated because of development.</p> <p>The provision of soft landscaping which includes pollinating within the scheme design will provide further foraging and nesting habitat on the site.</p>

6.3. As detailed above, whilst the ecological features in Table 1 have been scoped out, precautions are still required (Table 2).

Table 2, "Legal and best practice obligations"

Ecological Feature	Legal Obligation / Best Practice
Nesting birds	<p>Bird deterrent measures should be employed to minimise the chance of nesting birds in the first place. The demolition of the roof of the buildings will be undertaken outside nesting bird season, albeit pigeons can nest all year round.</p> <p>If this is not possible, a pre-commencement check should be undertaken.</p>

Ecological Feature	Legal Obligation / Best Practice
	These measures will be included within the method statement/Construction and Environmental Management Plan

7. CONCLUSIONS

- 7.1. The proposed project is self-contained in an area of buildings and hard standing and it will not have any adverse ecological impacts.
- 7.2. The proposed project will provide measurable gains for biodiversity in the form of:
- Planting suitable for pollinators and a green wall
 - Two bat boxes such as 2F Schwegler Bat Box mounted on a nearby mature tree within the school grounds
 - Two bird boxes such as 1B Nest Box. mounted on a nearby mature tree within the school grounds
- 7.3. These measures are in accordance with the requirements of the NPPF, London Plan Policy G6, Local Plan Policy LP15 and the Richmond upon Thames Biodiversity Action Plan.

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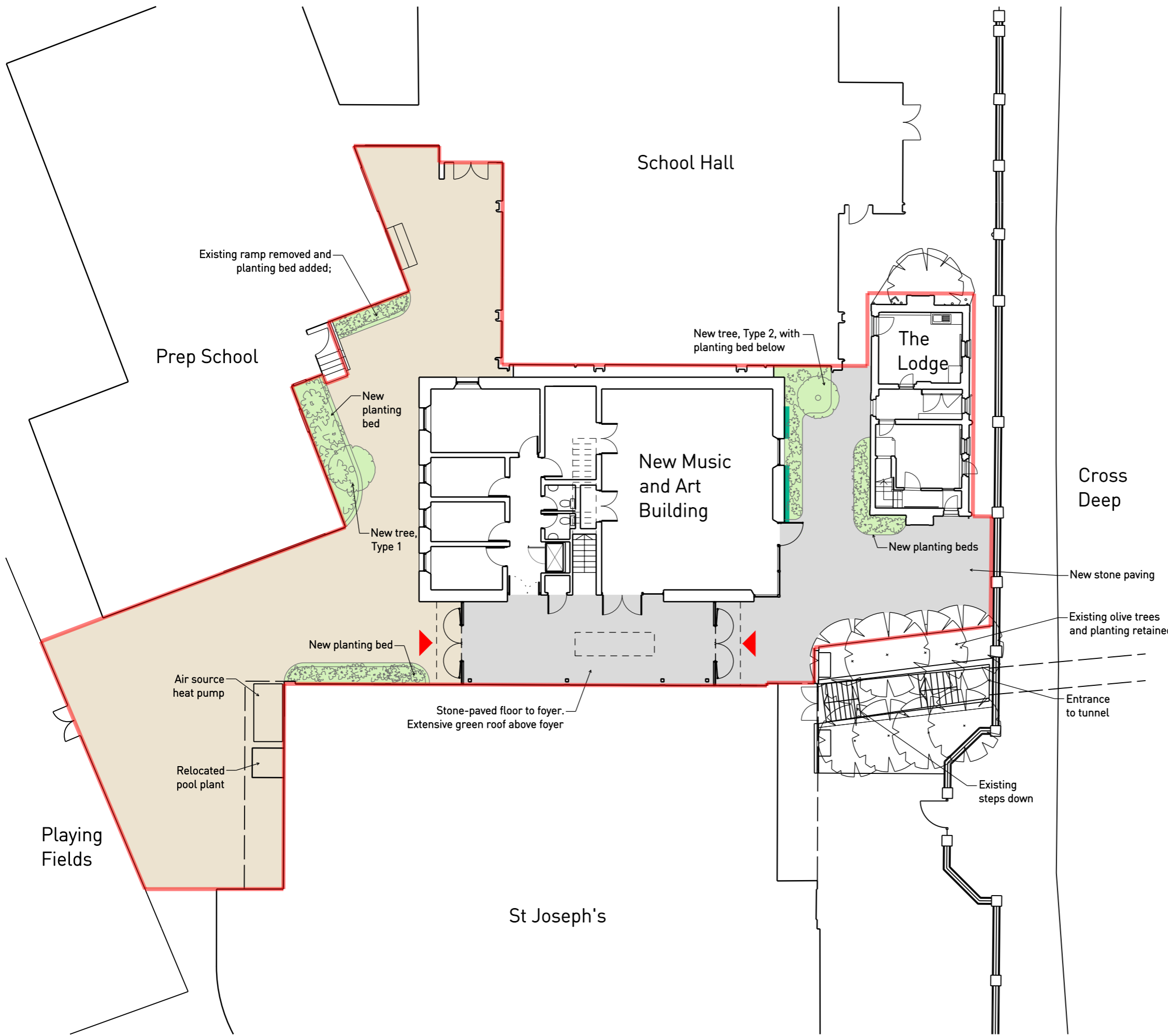
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Richmond Biodiversity Partnership (2018) London Borough of Richmond upon Thames Biodiversity Action Plan

APPENDICES

Appendix A: Proposed Development



KEY

- Site boundary line
- New stone paving
- Resin bound gravel
- Ivy on trellis forming green wall
- New planting suitable for pollinators, and new trees

New Tree Schedule

Type 1 Sorbus aucuparia Joseph Rock
 Type 2 Amelanchier alnifolia 'Obelisk'

Rev	Date	Status/Notes
B	06.11.23	2nd Planning Application DRAFT
A	03.07.23	2nd Planning Pre-Application Submission
*	16.11.22	Planning Application

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St Catherine's School
New Music & Art Building

Landscape Plan
As Proposed

Scale at A1 / (A3)	Drawn	Checked
1:100 / (200)	PS	TR

SCT 110 B



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