

Pinn River School Planning Application Response on Biodiversity Matters (2145/APP/2022/3534)

The updated Bat Report from November identifies bat roosts within the building to be knocked down. This would therefore result in the destruction of bat roosts including a long-eared bat maternity roost.

Our scheme has considered the impact to bats and has included suitable mitigations for the bat population.

The below sets out our initial bat mitigation proposals which will be further developed with Natural England under licence requirements.

We confirm that a Bat Licence Application will be submitted to Natural England prior to conducting any works that could impact bats on-site. The Licence Application will set out the pre-works inspections, likely impacts, mitigation, enhancement, monitoring, and work schedule required for the loss of bat roosts both within the bat roosts on site. All works will be conducted in accordance with the, legally binding, conditions of the licence

Given the nature of the site we previously requested a consultation with Natural England's Pre-screening Service (PSS) for licencing. The service was unavailable.

However, the principles of compensation and mitigation are well established, and we have collaborated with Richard Graves, a suitable qualified Ecologist to ensure that our proposals meet all government guidance. As such we can confirm that;

- Our mitigation or compensation proposals do not conflict with the requirements of a bat mitigation licence
- We are confident that Natural England will issue a licence
- There is a strong need for the development that outweighs any potential harm to the protected bats

(link to [Richard Graves Profile » Richard Graves Associates](#))

Development need

Part of the licence consideration is to determine whether there is an overriding need for the development that outweighs the impacts to the bats **and** if there is, that mitigation is in place to preserve the conservation of the species. Where proposals are 'public' and for the public good, including state schools they are deemed to be of overriding public importance.

For this scheme the existing school building is in poor condition and unfit for its current purpose it cannot be repaired or maintained to a suitable and sustainable modern standard. The area available for redevelopment is constrained to the existing buildings and hardstanding as the rest of the school grounds are Biodiversity Action Plan (BAP) priority deciduous woodland habitat, the loss of which would be unacceptable. The school serves an existing catchment, meeting local needs and no alternative suitable local sites in the control of the school's trust are available. Consequently, alternative solutions, including 'do nothing' are not feasible.

The proposal also accommodates pupils from the Royal National Blind Institute's Sunshine House School and the scheme needs to be constructed within 18 months to ensure that these additional students have teaching accommodation. The intake of students for Pinn River have very high care needs and specific form of teaching is required. This necessitates the provision of bespoke teaching accommodation that the proposal will deliver. The quality of teaching accommodation available to students significantly impacts on their quality of life.

Once planning permission (or other appropriate legal mechanism) has been granted we are confident that Natural England grant a licence when they have been provided with sufficient information on the working methodology and the appropriate compensation and mitigation and to satisfy the three tests in the Conservation of Habitat and Species Regulations 2017 which are:

1. Consideration of Alternatives
2. Imperative Reasons of Overriding Public Importance (including those of an economic and social nature) (IROPI test)
3. Maintaining the favourable nature conservation status of the species in its natural range (FNCS test)

Bat Mitigations

The bat species recorded on-site are considered to be common and widespread, nationally, regionally and locally. The works will not affect the favourable nature conservation status of the species as there is no lack locally of suitable roosting opportunities or foraging habitat (the school site being on the edge of a National Nature Reserve).

Section 10 of the submitted Bat (PROPOSED PINN RIVER SEND SCHOOL, 2022 BAT SURVEY REPORT vs 1.0), provides recommendations for the avoidance of harm to bats and their habitats, and enhancements to benefit bats, based on the levels of activity and the evidence of bats recorded in 2022.

We confirm that we will incorporate all of the recommendation from the report including:

- A Bat Licence will be submitted to Natural England will be obtained prior to conducting any works that could impact bats on-site. This will include a method of works for the demolishing of the building including all bat mitigation measures.
- Further Surveys where works are proposed between March to October which include removal of roosting features a activity survey will be completed immediately beforehand to confirm the presence / likely absence of bats and refine the location where most capture efforts may be required. This would include the re-inspection of trees if works have not been completed within one year of the initial inspection or if major storm damage has affected the site.
- Works to be Sensitive Timings of Works to be timed to minimise the impact on bat, with removal of the roof and other features to be completed in accordance with the Bat removal licence requirements.
- Breathable Roof Membranes should not be installed into a roof used by bats or into the roof voids of proposed new building(s). Only bituminous roofing felt that does not contain polypropylene filaments should be used. For example, bitumen felt type 1F, which is hessian reinforced.
- Prior to any works commencing on the roof of the building (and only under Licence):

- A 'Toolbox Talk' should be given to the contractors to make them aware of the risk of bats being present and what to do should a bat be found.
- Immediately prior to the start of works, the internal and external potential roosting features (PRF) on / in the Main School Building should be inspected by the registered ecologist, in an attempt to locate the bat access points.
- All PRFs should be removed in accordance with relevant licence conditions and under the supervision of the licenced bat ecologist or their agents.
- Any bats present at the time of the proposed works should be removed by hand (by the ecologist) and placed within a bat box which should already be in place on-site.
- A new roost structure including void space will be constructed and installed on-site in advance of the start of demolition. Several new bat roost boxes have already been installed on retained trees within the existing school site. This will be provided in advance of demolition.
- A new colony bat roost box will be included in / affixed to the new building when it is completed.
- We will undertake enhancement of the woodland within the school site to increase its structural and floristic diversity which would increase its value as part of the foraging resource for local bat populations.
- The lighting schemes will be sympathetic to bats and will be designed to avoid impact to the bat population.

Biodiversity net-gain assessment

The biodiversity net gain assessment was completed using the current approved metric (3.1) and only considers habitat types and areas. There is no mechanism in the metric to consider protected species.

Notwithstanding, we believe that the above mitigations and site enhancements we have committed to provide as part of the application provide suitable measures to avoid impact to the bat population.