

From: planningcomments@highpeak.gov.uk
To: [Planning Comments \(HPBC\)](#)
Subject: Comment Received from Public Access
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Application Reference No. : HPK/2024/0446

Site Address: Adult Education Centre Spring Bank New Mills Derbyshire SK22 4AZ High Peak

Comments by: Jamie AgombarSOS-UK

From:

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Submission: Objection

Comments: There appears to be no provision in the plans for renewables, despite there being ample roof space for solar alongside the new skylights. The 2022/23 update of the Building Regulations for England includes amendments to Part L (conservation of fuel and power). Volume 1 covers dwellings and introduces changes to the building's minimum energy performance target by introducing primary energy as a performance metric, including an expectation for incorporating a solar PV array.

In relation to low carbon heating systems, it is assumed there will be no centralised heating system, as the existing boiler room is proposed to be converted into a residential dwelling. As there is nothing in the plans to indicate where heat exchangers for heat pumps will be sited, it is assumed that each dwelling will have its own gas fired heating system installed by the developer. Installing new gas-fired boilers will work against the Government's legally-binding net zero target, as outlined in the 2008 Climate Change Act, and work against the plans in Derbyshire County Council own Climate Change Strategy. Gas combustion in buildings from boilers is a major source of local pollution, typically accounting for approximately a fifth of total NOx emissions in urban areas (Energy and Climate Intelligence Union, 2020). Gas-fired boilers in each flat will result in relatively low elevation venting pipes across the site, which will worsen localised air quality for children in the adjacent New Mills Primary School grounds, and local residents. To ensure the development supports national and county climate change targets and ambitions, the developer should revise the plans to integrate a centralised bank of heat pumps, with the costs recovered through service charges for owners / residents of the flats.

There is nothing in the plans to suggest there will be electrical vehicle charging points installed by the developer. There is guidance on the expectations relating to EV charging points in the updated Building Regulations, through the new Approved Document S, Infrastructure for the charging of Electric Vehicles S1-S6 and Regulations 44D-44J. That guidance does not appear to be implemented through the proposed development. Ideally every new parking space would be future-proofed by including an EV charging facility.

With regards to biodiversity, I concur with the comments provided by Derbyshire Swift Conservation. Having lived adjacent to the site for 18 years, I can confirm that Swifts nest in several of the buildings, including the two-story East-facing rear outbuilding. Unfortunately, several swift nesting sites were lost when Derbyshire County Council re-roofed the main building four years ago. Swifts are on the Red List of conservation concern, having declined by 62% between 1995 and 2021. Swifts are protected by under the Wildlife and Countryside Act 1981. Swift Conservation recommend that there should be no work on the roof while the Swifts are nesting (May to August), that Swift nest places be undisturbed by any works and that swift access holes be left or that developers make new ones to match the old ones exactly.

I note Helen Hamilton's comments about bats likely using the buildings as a roost. We often see bats feeding in and around the buildings in the proposed development over the summer, and concur with Helen's comment. All species of bat are protected by Regulation 43 of the Conservation of Habitats and Species Regulations 2017. Given the size of this proposed development, the likely presence of roosting bats, and the presence of nesting Swifts, and I recommend that the Council rejects the current proposal and insists that a full environmental and ecological impact assessment, with proposed mitigations, is completed and considered prior to planning permission for the development being granted.

I am pleased that the developer plans to plant some trees in the recreational area by the two-story East-facing rear outbuilding, as this will encourage biodiversity and support High Peak Borough Council's Plan for Nature. That plan commits the Council to leading the way in sustainable planning, with it being recognised for a dynamic approach to ecology and development. I would encourage the developers to ensure the planted trees are native species that support local biodiversity, as well as revisiting their plans for the rest of the site, as much more could be done to integrate nature into the development.

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