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Planning Applications Manager
High Peak Borough Council
Planning Department
Municipal Buildings
Glossop
Derbyshire
SK13 8AF

For the attention of Rachael Simpkin

Your Ref: HPK/2024/0446

Our ref: DWTHPK770a

10th July 2025

Dear Rachael,

Proposal: Conversion of existing buildings to form 26 No. residential flats

Location: Adult Education Centre, Spring Bank, New Mills, Derbyshire, SK22 4AZ

Application Ref No: HPK/2024/0446

With reference to the above application, I am responding as the Biodiversity Planning Officer responsible for work relating to the Service Level Agreement, which the High Peak Borough Council and the Trust have signed. The following comments are aimed at providing accurate and up to date information on the nature conservation issues associated with the proposed development.

Response

Further to our letter dated 9th January 2025 (DWTHPK770), a Preliminary Bat Roost Assessment (PBRA) (Arbtech, May 2025) has been submitted. It appears that the ecologists are not aware of our previous letter response, which clearly set out expectations for survey at this site. It also referenced existing records of a bat roost and swift nest at the site.



No data consultation has been undertaken with Derbyshire Biological Record Centre to obtain the details of these records. This should be undertaken, as additional records have been submitted since my January response. In this case, the conclusion made on Page 3 of the PBRA that the purchase of biological records data would not add any significant weight or alter the conclusions and recommendations outlined in the report is incorrect.

The report recommends a single bat emergence survey of each of the two buildings on site but this should be increased due to the record of a previous bat roost on site. The report recommendations do not take this into account.

Swifts have been recorded nesting on site and it is essential that nest locations are identified so that they can be retained and protected during works or otherwise recreated in the same location e.g. via installation of a box. I provided detailed comments on this in my letter in January, including requirements for survey work and a Swift Mitigation Strategy. These should take into account existing records for nest locations at the site. The report makes no reference to this.

The report states that no plans were available at the time of writing, however multiple plans are present on the planning portal. It is essential that proposals are communicated to the ecologists to enable an impact assessment as part of the planning application. My letter stated: *“The extent of works to the roof coverings, eaves and internal roof space should be discussed in detail with a suitably qualified ecologist to determine the likelihood of impacts to roosting bats and swifts”*.

The enhancements recommended in the PBRA require amending. The site is an important nest site for local swifts and therefore priority should be given to retaining and enhancing nesting opportunities for this species. Furthermore, swallow cups are not appropriate for external walls and should only be installed in open-fronted buildings.

The PBRA should be updated in line with these comments and I would be happy to liaise directly with the ecologists regarding the scope of works, if helpful. As we are now in the peak season for bats and swifts, I would urge the surveys to be undertaken at the earliest opportunity, otherwise there is a risk that determination of the application could be delayed until after the 2026 survey season. Once the required survey and impact assessment works have been completed, we can recommend suitable condition wording.

It is hoped that the information provided is helpful to the Council. If you require any further information or wish to discuss any of the comments made, please do not hesitate to contact me.

Yours sincerely,

Libby Duggan-Jones MBiolSci MCIEEM
Biodiversity Planning Officer