



Derbyshire
Wildlife Trust

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: DWTHPK770b

29th January 2026

Dear Rachael,

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

Location: Adult Education Centre Spring Bank New Mills

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

Bats

Further to our response dated 10th July 2025, a copy of the Preliminary Bat Roost Assessment (PBRA) (Issue 4) has been re-submitted.

Sandy Hill, Main Street, Middleton, Matlock, DE4 4LR
01773 881188 • enquiries@derbyshirewt.co.uk

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Wilder by nature

Due to the existing bat roost record, the PBRA was updated to recommend three nocturnal bat surveys instead of one per building, in line with best practice guidance. These were carried out between July and September 2025 and no roosts were recorded. Details are provided in the Bat Emergence and Re-Entry Surveys report (Arbtech, September 2025).

No bat licence will be required but precautionary measures are necessary during works, as specified on Page 42. These measures are considered appropriate and should be secured via condition. Conditions will also be required for a Lighting Strategy and to secure bat boxes.

Swifts

We understand that a data consultation was undertaken with Derbyshire Biological Records Centre in November 2025, however this is not made clear in the bat survey report. Two detailed records of nesting swifts were provided for the Adult Education Centre and outbuilding but these locations are not discussed in the report, in terms of impacts and whether they can be retained.

Despite our previous letter responses (January and May 2025), no swift surveys have been carried out. The recommendation for swift survey was stipulated in both our January and July 2025 letter responses, with clear and detailed recommendations made to identify nesting locations. The recommendation for swift surveys was also recorded in correspondence between DWT, the LPA and the applicant in Jan / Feb 2025 regarding an extension of time. The recent RSPB Swift Survey Guidance was provided as part of this correspondence.

No swift nests were incidentally recorded during the bat surveys, however only one survey visit was in July, with the other two in late August and September

which are outside the optimal time for swift surveys and unlikely to provide useful information. We know that swifts were nesting on site in May 2025, with 6 individuals stated in the existing detailed record.

The report recommends standard measures to avoid works during the nesting season and the installation of swift boxes. This is not considered sufficient mitigation. Swifts are faithful to their nest sites, typically returning each year. It is therefore important that nest locations are identified so that they can be retained and protected during works in the first instance or otherwise recreated in the same location e.g. via installation of a box. It is not sufficient at a known nesting site to just install boxes in various locations in the hope they will be suitable.

Populations of swifts have declined by 68% from 1995 to 2023¹ and they are now Red Listed on the UK Birds of Conservation Concern. It is essential that known nest sites are adequately protected during the planning process.

We advise that sufficient survey work has not been undertaken to inform appropriate targeted mitigation for swifts, despite clear guidance being provided in time for the surveys to be completed. We also offered to liaise directly with the ecologists regarding the scope of works. I therefore suggest two options:

- 1) The application should not be determined until swift surveys have been completed in July 2025 and a Swift Mitigation Strategy approved, or
- 2) The application is determined with a strict pre-commencement condition for swift surveys in July 2025 and the approval of a Swift Mitigation Strategy.

¹ <https://www.bto.org/learn/about-birds/birdfacts/swift>



The Swift Mitigation Strategy should include identified nest locations and should specify which can be retained and which will be lost. Where features will be lost, boxes shall be installed in the same location. Seasonal restrictions will also be required for works in proximity to nesting locations, as active nests are protected by law. This will include prohibiting scaffolding that blocks nest sites. I would be happy to provide condition wording once the approach to swift mitigation is confirmed.

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

Libby Duggan-Jones MBiolSci MCIEEM

Biodiversity Planning Lead (North)

planning@derbyshirewt.co.uk