

London Mill, Ashbourne Road - SWT Comments DOC

Date: 03/06/26

Application Reference: DOC/2025/0045 relating to SMD/2023/0191

Location: London Mill , Ashbourne Road

Proposed Development: Discharge of conditions 4, 5, 14, 15, 16, 17, 20 in relation to SMD/2023/0191

Staffordshire Wildlife Trust has been asked to review the above application as part of a service level agreement with Staffordshire Moorlands District Council to provide ecology advice regarding planning and development management functions.

Documents Viewed:

- Application form
- Decision notice for SMD/2023/0191
- 25 031_Condition Discharge_A _ RevA, Inc Architects Ltd, 10th December 2025
- Preliminary Roost Assessment, CW Ecology, Nov 2025
- Construction Ecological Management Plan, CW Ecology, Nov 2025

Summary: We have reviewed the Conditions of relevance to biodiversity (15, 16 and 17).

We recommend that Condition 15 is **discharged**. However the Preliminary Roost Assessment (dated November 2025) shall only be valid for 2 years from the date of production as specified in section 5.1.4 of the PRA.

We recommend that Conditions 16 and 17 are **not discharged** until the following information is supplied and our comments are resolved: further measures to avoid harm to nesting birds are included in the CEMP and reference to swift boxes/bricks and bat boxes/bricks is added to the CEMP.

Further detail

Condition to be Discharged

Condition 15

“Prior to commencement of development an up to date bat activity survey shall be undertaken as a precautionary measure with the results and any mitigation required with timescale for implantation submitted to and approved in writing by the Local Planning Authority. Should bat roost(s) be identified, development shall not commenced until such time that a licence from Natural England has been granted. The

development shall be carried out strictly in accordance with the agreed details and timescale.”

We recommend that this condition is **discharged**. However the Preliminary Roost Assessment (dated November 2025) shall only be valid for 2 years from the date of production as specified in section 5.1.4 of the PRA. If development does not commence before this date then another Preliminary Roost Assessment should be undertaken.

Condition 16

“No development shall take place until such time that a Construction and Ecological Management Plan (CEMP) has been submitted to and approved in writing by the Local planning Authority and shall include measures to avoid harm to nesting birds, as recommended in Section 4.2 of the submitted PEA and a pre-construction check of the building for swifts. The development shall thereafter proceed strictly in accordance with the agreed CEMP”

We recommend that this is **not discharged**.

Section 4.2 of the PEA states *“It is recommended that should any vegetation requires removal or if the upper floors or soffits of the building require works within the breeding bird season (March – September inclusive), a suitably qualified ecologist to inspect the area no more than 24 hours prior to the removal.”* This will need to be included in the CEMP. There is also no reference to a pre-construction check of the building for swifts which will also need to be included.

Condition 17

“No development shall take place until such time that an Ecology Design Statement has been submitted to and approved in writing by the Local Planning Authority. Amongst other matters it should include for swift boxes/bricks and bat boxes/bricks to be integrated into the design and timetable for implementation. The development shall thereafter be carried out strictly in accordance with the agreed details and timetable”

We recommend that this is **not discharged**. The confirmation of discharge of conditions letter refers to the CEMP in place of an Ecology Design Statement, this is acceptable however the CEMP does not include swift boxes/bricks and bat boxes/bricks to be integrated into the design and timetable for implementation as per the condition. This will need to be included.