

The Orchard SWT Comments

Date: 19/02/2026

Application Reference: SMD/2025/0302

Location: THE ORCHARD , LOWER HILL FARM , Uttoxeter Road , Draycott In The Moors , Staffordshire , ST11 9RG

Proposed Development: Proposed detached dwelling and detached double garage

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
- Location and Site Plan- Hewitt and Carr, June 2025
- BNG Report- Eco360, April 2025
- Preliminary Ecological Appraisal- Eco360, April 2025
- Planning Statement- Hewitt and Carr, May 2025

Summary: We recommend a **holding objection** until the following information is supplied and our comments are resolved:

- The differences in the redline boundaries should be resolved.
- Amendments to the BNG metric as the hedgerows cannot be included as they are part of the vegetated garden
- More detail on how a net gain is going to be provided
- More detail on any external nocturnal lights during and post construction should be provided

Further detail

There are three different redline boundaries in the BNG report, PEA and site plan. These should all be the same.

As it is self-build, the application is not subject to the statutory net gain condition; however, it is still required by the NPPF and local plan policy NE1.5 to demonstrate a net gain in biodiversity. The completed statutory biodiversity metric shows significant losses on the site. Additionally, the hedges cannot be included as BNG gain as they are part of the vegetated garden and therefore cannot be secured for 30 years. The losses are such that the species boxes suggested would not compensate for the losses. Due to this it is recommended that, in addition to the biodiversity measures suggested, biodiversity units should be purchased off site to demonstrate a gain in biodiversity units.

We request detail on whether any external nocturnal lighting is planned for the development both during the construction and operational phase. Depending upon the response, we may require a sensitive nocturnal lighting scheme to be secured through a pre-commencement planning condition. Any external nocturnal lighting both during and after construction should be designed in line with guidance from the [BCT on Bats and Artificial Lighting at Night](#). Lighting should include cowls / hoods or shields, operational timers and use a lighting spectrum ideally below 2700K. A further planning condition would then be required to demonstrate adherence to the sensitive lighting scheme.

Conditions

Reasonable avoidance statements (RAMs) should be provided for amphibians, reptiles, badgers, birds and hedgehogs detailing Reasonable Avoidance Measures (RAMs) for these during any further ground clearance works and construction as recommended in the PEA. This should include instructions detailing what should be done if a protected species is encountered and measures to avoid entrapment of mammals during construction works. This should be secured through a planning condition and a provision made for construction personnel sign to say that they have read, understood and will adhere to this.

Biodiversity Measures

As detailed in the PEA and in accordance with the NPPF and Biodiversity Duty, the following measures for biodiversity should be conditioned:

- The creation of a wildlife pond
- Creation of a wild meadow
- Creation of amphibian and reptile refugia and hibernacula
- Creation of reptile basking areas
- All trees and shrubs should be native species and of local provenance.
- Fruit bearing trees will be planted
- Hedgehog highways should be created in all fences so that hedgehogs can move freely through the development.
- Green roof on new buildings
- Retention of deadwood within the site
- Any roofing membranes used should not harm bats – if a NBCRM is used, a certificate should be provided that proves the roofing membrane selected has passed a ‘snagging propensity test’.
- Pre-commencement condition of the location and type of a minimum of two insect boxes, at least two Eco Hedgehog Nest Box, at least two bird boxes and at least two bat boxes to be installed. These should be made of woodcrete to ensure longevity. This should allow compliance with the NPPF, local plan and NERC Act.