

The Orchard SWT Comments

Date: 23/06/2026

Application Reference: SMD/2026/0110

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
- Preliminary Ecological Appraisal- Eco360, April 2025
- Updated Biodiversity Net Gain Report- Eco360, April 2025
- Updated Small Sites Metric- Eco360, May 2025
- Amended Plans 1,2&3- Hewitt and Carr, June 2025

Summary: We recommend **no objection** subject to the following conditions:

- Reasonable avoidance measures for amphibians, reptiles, badgers, birds and hedgehogs.
- If external lighting is to be used a lighting plan should be created.
- Biodiversity enhancements including the creation of a pond, planting of trees and hedge, enhancement of grassland and the installation of insect, hedgehog, bird and bat boxes on the site.

Further detail

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

As it is self-build, the application is exempt from the statutory biodiversity 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 a gain on site, however, the proposals for the post development of the site including hedges, ponds and grasslands cannot be included as BNG gain as they are within the curtilage of a residential property and should therefore be designated as vegetated garden, which cannot be secured for 30 years. This would result in a large net loss on the site.

However, as this is exempt from BNG the and the metric does show that an uplift can be achieved, we would be happy with the creation of a pond, planting of trees and hedge and the enhancement of part of the grassland to fulfil the NPPF requirement and this should be conditioned.

Conditions

No external lighting is proposed for the site. However, if this changes, 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.

Reasonable avoidance statements (RAMs) should be provided for amphibians, reptiles, REDACTED 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.
- 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 a of a minimum of two insect boxes, at last 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.