

From: Claire Install [REDACTED]
Sent: 24 June 2026 11:39
To: Hannah Varley [REDACTED]; Ella Moore [REDACTED]
Subject: Re: SMD/2026/0160 - Bracks Farm , School Lane

Hi,

In addition to our other comments, they haven't met minimum validation criteria as per the [BNG PPG](#). The following information is required:

- The date of the pre-development biodiversity value(s), should be [either on the date of application or earlier proposed date \(as appropriate\)](#);
- The date of publication of the metric should be either:
 - 29th November 2023
 - 15th December 2023
 - 12th February 2024
 - 23rd July 2024

In addition, as they are proposing to enhance modified grassland to other neutral grassland in good condition, soil tests should be taken to ensure that the soil is suitable to support other neutral grassland. If it is not, we will require detail on how the soils will be prepared to make them suitable for other neutral grassland - as an example, this may be soil inversion.

More information on soil testing for BNG purposes can be found here - ensure that the test is for creating species rich grassland and not agricultural purposes:

<https://publications.naturalengland.org.uk/publication/31015>
https://media.buckinghamshire.gov.uk/documents/Buckinghamshire_Council_Soils_and_BNG_Guidance_for_Grassland_Creation_March20_qJ6ntED.pdf

Technically this is a significant on-site habitat being created so the monitoring and management will need to be legally secured for 30 years - this can be through either a condition or S106 - this is something you will need to consider in advance of a decision being made.

All the best,

Claire



Staffordshire
Wildlife Trust

www.staffs-wildlife.org.uk



Claire Install
Ecological Planning Manager



Staffordshire Wildlife Trust
The Wolseley Centre
Wolseley Bridge, Stafford, ST170WT

Registered charity 259558

From: Claire Install [redacted] >

Sent: 24 June 2026 11:05

To: Hannah Varley [redacted]; Ella Moore [redacted]

Subject: Re: SMD/2026/0160 - Bracks Farm , School Lane

Hi Hannah,

Thanks for these.

There doesn't appear to be baseline habitat maps only covering the area impacted by the development. It would be useful to have maps that cover all areas impacted by the development - so if the old drive is changing, this needs to be included. Some sort of BNG report or statement just for this area would be useful so we know exactly what is in the area to be impacted (e.g. any species lists would be relating to this land only not land elsewhere within the land holding) as the PEA covers such a large area, we just need to know about the area included in the red line boundary and in addition any protected or notable species or habitats in the vicinity that may be impacted.

All the best,

Claire



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Ecological Planning Manager



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