

[REDACTED]

From: SWT Planning <planning@staffs-wildlife.org.uk>
Sent: 17 August 2026 11:51
To: Preece, Alan
Cc: Planning Comments (SMDC); Ben Hurst
Subject: Woodhouse Burial Ground - DOC/2026/0009

[REDACTED]

Hi Alan,

Please see our below comments, mostly just minor points to correct if you could take a look through and hopefully we can progress this one quickly. Do get in touch if you have any queries or other issues. Thank you again for taking the time to work closely with us on this one.

Gain Plan

- Section 3.7 signature missing
- Section 4.16 and 4.17 references the Biodiversity Gain Plan as the 'Pre-development habitat survey report and map' and the 'Post-development habitat map of landscape plan' however this should instead perhaps refer to the BNG report? If so please could this be updated

HMMP

- The Metric revision is stated as November 2024 in section 1 however this is not a valid date, please can this be updated, selecting from the following dates:
 - 29th November 2023
 - 15th December 2023
 - 12th February 2024
 - 23rd July 2024
 - 3rd July 2025
- The 'Management organisations responsible for implementing the HMMP' section on p7 is incomplete. I realise this is the same as the Landowner details but please could these be copied over or 'As above' stated.
- On p9, it is worth flagging under 'Climate' that the tree species may not be suitable for a changing climate and could be impacted by drought. Eg. Silver birch may be particularly susceptible to drought: <https://www.forestresearch.gov.uk/tools-and-resources/tree-species-database/131561-silver-birch-sbi-2/>.
- Similarly on p33 under Risk Register please could climate change be added with remedial measures including the existing reference to watering and also that an alternative suitable species may need to be planted to replace any lost trees.
- The Grassland: creation, enhancement and management summary p30-31, condition assessment C, F and G, should include the removal of scrub/bracken/invasive non-native species respectively should this be required and that any invasive species removal is conducted in strict accordance with government guidelines and legislation requirements. And for condition assessment criteria D and E, please could this include reseeded where required.

- On p26, for D1 INNS, please could “spot treatment as required” be replaced with “remove any invasive species in strict accordance with government guidelines and legislation requirements” and on p33 in the Risk Register could the invasive species risk be updated to include a similar reference.
- On p28, could the hedge cutting timing under ‘Management’ be updated such that the hedge is to be cut from mid to late summer, as late as possible to avoid bird breeding season, if this cannot be done then a check for nesting birds and delay cut if present.
- Under section 3 Monitoring Schedule p34, the monitoring strategy includes reference to 10% net gain, please could this be removed as the metric states a higher gain
- Under Monitoring Reports p35, monitoring reports are a statutory requirement which should have been set as a condition, we suggest submitting a very basic report consisting of photos and brief description of habitats and any remedial measures taken since last report. To be submitted in years 1, 2, 3, 5, 10, 15, 20, 30. Please could this information be added.

BNG report and metric

- As per our previous discussion, please could the buxus hedge bordering the central circular flowerbed be removed from the maps and metric.

Kind Regards,

Vicky



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Planning Team

T: [REDACTED]

E: [REDACTED]

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