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**From:** [REDACTED]  
**Sent:** 03 December 2021 13:13  
**To:** PlanningPolicyConsultation  
**Cc:**  
**Subject:** Local Plan 2038 Consultation Response Form

Form Submission

Gosport Borough Local Plan 2038 Consultation Response Form

Gosport Borough Local Plan 2038 Consultation Response Form

Please provide your details

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Is an Agent/Consultant appointed? No

Please provide the Agent's/Consultant's details:

Name

Job title (where relevant):

Organisation (if any):

Address

Postcode

Telephone

Email

Your representation (1)

The draft Gosport Borough Local Plan 2038 contains a vision, objectives and policies with explanation text. Please use the boxes below to let us know what you are commenting on and whether you support or object along with your comments.

Paragraph/Policy Number: 1.8 Vision

Support or Object? Support

Please summarise why: The Woodland Trust supports the overall vision for a sustainable and healthy environment, adapting well and mitigating the impacts of climate change, in particular the following paragraph

"Growth will not be at the expense of our environment. Development will enhance the environment and achieve a net gain in biodiversity. The planting of trees will boost biodiversity and internationally and nationally designated sites will be suitably protected and enhanced."

If you have no more representations to add, please select this box

#### Your representation (2)

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Paragraph/Policy Number: 1.9

Support or Object? Support

Please summarise why: Support Objective 1 Create a sustainable and healthy environment, adapting well and mitigating the impacts of climate change.

The Local Plan has a crucial role to play in protecting the existing natural environment, and safeguarding its recovery and expansion, in order to deliver a healthy environment that is resilient in the face of climate change.

If you have no more representations to add, please select this box

#### Your representation (3)

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Paragraph/Policy Number: D1 e)

Support or Object? Support

Please summarise why: We welcome the recognition that enhancing green infrastructure and biodiversity is a vital part of the poliyc on climate change. The climate crisis is paralleled by a nature crisis and we need solutions that will tackle both.

A rapid increase in the rate of woodland creation has been proposed by the UK's Committee on Climate Change (CCC), to provide a key mechanism to lock up carbon in trees and soils, provide an alternative to fossil fuel energy and resource-hungry building material, and importantly to stem the declines in biodiversity. The Woodland Trust supports the CCC's recommended an increase in UK woodland cover from its current 13% of land area to 19% by 2050 to tackle this country's biodiversity and climate crises. More information can be found in the Trust's 2020 publication The Emergency Tree Plan. <https://www.woodlandtrust.org.uk/publications/2020/01/emergency-tree-plan/>

If you have no more representations to add, please select this box

#### Your representation (4)

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Paragraph/Policy Number: D4

Support or Object? Support

Please summarise why: We strongly support this policy and the integration of green infrastructure as a priority land use across the local plan.

In each type of area, green infrastructure should be protected, enhanced and integrated into development plans, including through local tree strategies, landscape management plans or urban development briefs.

We welcome the inclusion of green infrastructure as part of essential infrastructure and connectivity and urge a landscape-scale approach to maximise the benefits for nature and people.

We welcome the explicit mention of woodland in para 1. In particular, we note the importance of protecting and enhancing natural habitats around existing areas of woodland to improve connectivity with the surrounding landscape. We suggest adding explicit mention of hedgerows in this section.

We recommend strengthening this policy with a reference to Local Nature Recovery Strategies (LNRS), a new requirement from the Environment Act 2021, which will be developed during the lifetime of the local plan, which should also be included in Policy D5.

We suggest reflecting this in a bullet point under para 2: "Protection and enhancement of the Local Ecological Network and delivery of the Local Nature Recovery Strategy (Policy D5);

If you have no more representations to add, please select this box

Your representation (5)

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Paragraph/Policy Number: D5

Support or Object? Support

Please summarise why: We welcome this policy

We recommend strengthening the policy with a reference to Local Nature Recovery Strategies (LNRS) which will be developed during the lifetime of the local plan.

We recommend adding a new para 5 (based on wording developed by the LNRS pilot in Cornwall)

5. Where development is sited within or adjacent to the identified Local Nature Recovery Network it should demonstrate how the proposal will maintain and enhance the ability of the network to restore habitat and provide ecosystem services in line with the Local Nature Recovery Strategy.

If you have no more representations to add, please select this box

Your representation (6)

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Paragraph/Policy Number: D7

Support or Object? Support

Please summarise why: We recognise that Gosport's coastal location requires special measures to deal with flood protection. We would like to see the policy strengthened with mention of natural solutions, including tree planting.

Planting trees can slow the flow of water and reduce surface water runoff by up to 62% compared to asphalt. Trees intercept water as it falls, which is then directly evaporated back into the atmosphere. Roots help the infiltration of

water into the soil, lowering the risk of surface water flooding. Tree roots can increase infiltration rates in compacted soils by 63%, and in severely compacted soils by 153%. Integrating SUDS and tree pit design can have a significant effect on 'slowing the flow'. Adequate soil volumes provided within hard surfaces can retain substantial volumes of water within the soil matrix, reducing inundation and providing slow release back into natural or engineered drainage systems. Bioswales and areas of wet woodland provide multiple benefits to nature and landscape and can be connected to the wider Green Infrastructure network.

We therefore propose the following change:

To para 5. a) be designed in accordance with the latest best practice, including use of natural solutions where appropriate.

If you have no more representations to add, please select this box

Your representation (7)

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Paragraph/Policy Number: D8

Support or Object? Support

Please summarise why: We welcome the policy in support of access to greenspace including natural greenspace in general, and woodland in particular.

We therefore propose rewording 2) to read

b) The provision of high quality and accessible new open space and green infrastructure and the improvement of existing provision. This includes sports pitches, play areas and allotments (See Policy A4, A5 and LE1-LE4) as well as natural greenspace and woodland (See Policy D4, D6 and LE7);

We recommend adopting policy standards for residential developments that support access to the natural environment and woodland for informal recreation.

Natural England's Accessible Natural Green Space Standard recommends that all people should have accessible natural green space:

- Of at least two hectares in size, no more than 300m (five minutes' walk) from home.
- At least one accessible 20-hectare site within 2km of home.
- One accessible 100-hectare site within 5km of home.
- One accessible 500-hectare site within 10km of home.
- A minimum of one hectare of statutory local nature reserves per 1,000 people.

The Woodland Trust has developed a Woodland Access Standard to complement the Accessible Natural Green Space Standard. This recommends that:

- That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size.
- That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes.

If you have no more representations to add, please select this box

Your representation (8)

The draft Gosport Borough Local Plan 2038 contains a vision, objectives and policies with explanation text. Please use the boxes below to let us know what you are commenting on and whether you support or object along with your comments.

Paragraph/Policy Number: D9

Support or Object? Support

Please summarise why: We welcome the inclusion in e) of supporting and enhancing biodiversity, green infrastructure and local landscapes as an integral feature of the Design approach.

However the policy lacks any specific mention of trees, nor are trees mentioned in paras 2.10.19 and 2.10.20 The National Model Design Code and England Trees Action Plan underline the important role of trees on streets and within residential development sites. Trees can play a significant aesthetic role helping integrate new developments into existing ones and creating a local identity.

Integrating trees and green spaces into developments early on in the design process minimises costs and maximises the environmental, social and economic benefits that they can provide. We recommend the guidance published by the Woodland Trust Residential developments and trees - the importance of trees and green spaces (January 2019).

<https://www.woodlandtrust.org.uk/publications/2019/01/residential-developments-and-trees/>

We therefore recommend strengthening the wording of e) Nature: supporting and enhancing biodiversity, green infrastructure and the Borough's distinctive landscapes, including tree-lined streets, as an integral feature of the Design approach.

If you have no more representations to add, please select this box

Your representation (9)

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Paragraph/Policy Number: D11

Support or Object? Support

Please summarise why: We support the inclusion of Green Infrastructure in this policy.

We recommend strengthening 2 e) with explicit reference to trees, given the emerging policy in the England Trees Action Plan and new National Model Design Code

2 e) Green Infrastructure (including open space, tree planting, biodiversity net gain, nutrient neutrality measures and climate change mitigation and adaptation);

If you have no more representations to add, please select this box

Your representation (10)

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Paragraph/Policy Number: LE1

Support or Object? Object

Please summarise why: We support the principle that residential developments should have access to the natural environment, including to woodland, which is not currently adequately reflected in this policy.

We recommend adopting policy standards for residential developments that support access to the natural environment and woodland for informal recreation.

Natural England's Accessible Natural Green Space Standard recommends that all people should have accessible natural green space:

- Of at least two hectares in size, no more than 300m (five minutes' walk) from home.
- At least one accessible 20-hectare site within 2km of home.
- One accessible 100-hectare site within 5km of home.
- One accessible 500-hectare site within 10km of home.
- A minimum of one hectare of statutory local nature reserves per 1,000 people.

The Woodland Trust has developed a Woodland Access Standard to complement the Accessible Natural Green Space Standard. This recommends that:

- That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size.
- That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes.

If you have no more representations to add, please select this box

Your representation (11)

The draft Gosport Borough Local Plan 2038 contains a vision, objectives and policies with explanation text. Please use the boxes below to let us know what you are commenting on and whether you support or object along with your comments.

Paragraph/Policy Number: LE6

Support or Object? Support

Please summarise why: It is vital that the local plan protects irreplaceable habitats, such as ancient woodlands, hedgerows and individual ancient & veteran trees from direct harm or loss, and from indirect adverse effects of development.

We support the principle that proposals that affect the existing biodiversity, geodiversity, and blue/green infrastructure of a site must be designed in a way that avoids or mitigates any potential harm, resulting in a net gain.

Irreplaceable habitats, such as ancient woodland, must never be included in net gain calculations, and mitigation and compensation measures must not form part of the considerations in making planning decisions.

Any scheme that damages such habitats, irrespective of any mitigation and compensation measures, cannot deliver net gain.

If you have no more representations to add, please select this box

Your representation (12)

The draft Gosport Borough Local Plan 2038 contains a vision, objectives and policies with explanation text. Please use the boxes below to let us know what you are commenting on and whether you support or object along with your comments.

Paragraph/Policy Number: LE7

Support or Object? Support

Please summarise why: The Woodland Trust supports this comprehensive policy to protect and enhance Gosport's trees and woodland.

In particular, we welcome

para 1. the presumption in favour of retention of existing trees, hedgerows and woodland para 2. protection for ancient woodland, ancient & veteran trees

para 4. d a greater than 1:1 ratio for tree replacement

para 5 inclusion of street trees as part of development schemes

We recommend that the policy be further strengthened in the following ways:

a) adding a larger buffer for ancient woodland in para 3. Where development sites are adjacent to ancient woodland, we recommend that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance. Further information can be found in the Trust's Planners' Manual for Ancient Woodland. <https://www.woodlandtrust.org.uk/publications/2019/06/planners-manual-for-ancient-woodland/>

b) setting a canopy cover target for development sites. A rapid increase in tree canopy cover has been proposed by the UK's Committee on Climate Change. We recommend setting a target for tree canopy cover will be pursued through the retention of important trees, appropriate replacement of trees lost through development, ageing or disease and by new planting to support green infrastructure. More information can be found in the Trust's Emergency Tree Plan. <https://www.woodlandtrust.org.uk/publications/2020/01/emergency-tree-plan/>

c) by setting a greater than 2:1 ratio for tree replacement. While we welcome the 2:1 ratio set in para 4d, we believe this could be improved by setting a proposed ratio of tree replacement, which reflects the Woodland Trust guidance on Local Authority Tree Strategies (July 2016) with a ratio of at least 2:1 for all but the smallest trees and ratios of up to 8:1 for the largest trees. <https://www.woodlandtrust.org.uk/publications/2016/07/local-authority-tree-strategies/>

d) We would further encourage the specification where possible of UK sourced and grown tree stock for new planting, to support biodiversity and resilience.

The Woodland Trust is happy to provide further detailed advice and support on preparing this important policy of the local plan and any future associated guidance.

If you have no more representations to add, please select this box

Your representation (13)

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Paragraph/Policy Number: LE8

Support or Object? Support

Please summarise why: While we have no objection to the policy as drafted, we would recommend setting a greater than 10% target for net gain. By setting a more ambitious target, the Local Plan increases the chances that worthwhile amounts of net gain will be delivered, given the possibility that initiatives intended to deliver such gain may fall short in practice.

We would also encourage considering development of a local metric for more urban/brownfield sites, such as the London Urban Greening Factor, because such sites may already have a very low level of biodiversity and therefore a percentage increase may not in practice deliver significant enhancements.

Where net gain is delivered offsite, we support para 2 that this should contribute to the Local Ecological Network including the conservation, enhancement and connection of existing habitats, including ancient woodland.

If you have no more representations to add, please select this box

Your representation (14)

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Paragraph/Policy Number: LE9

Support or Object? Support

Please summarise why: We support this policy including in para 1 mention of the impact of pollution on the wider environment.

We would recommend strengthening this further with specific mention of the natural environment as pollution effects are not limited to human health.

We suggest rewording para 1 to read

Planning permission will be granted for proposals where the projected levels of pollution generated by the development, including air, odour, noise and light pollution, do not have a likely significant effect upon existing and future occupiers, neighbouring occupiers, and the wider built and natural environment.

If you have no more representations to add, please select this box

Your representation (15)

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Paragraph/Policy Number: D3

Support or Object? Support

Please summarise why: The Woodland Trust has no objection in principle to the policy that priorities brownfield land for development.

We recommend that any site allocations should apply the following principles to guide both site selection and the subsequent design of development: avoid harm; provide unequivocal evidence of need and benefits; deliver biodiversity net gain.

Use of previously developed land should only be permitted if the proposal would not cause harm to areas of high environmental value.

We have not identified any specific threats to ancient woodland or ancient & veteran trees from the site allocations proposed in the Gosport local plan. However it may be the case that small areas of ancient woodland and individual ancient or veteran trees have not been mapped and may be affected. We urge that comprehensive mapping is undertaken before site allocations are finalised and that where necessary, appropriate buffer zones are applied in line with policy LE7.

If you have no more representations to add, please select this box

Your representation (16)

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Paragraph/Policy Number: Appendix 1

Support or Object? Support

Please summarise why: Land at Rowner Road - support the requirement for protection of the adjacent Rowner Copse SINC and protected trees. This should include an appropriate buffer zone for the SINC and root protection areas for individual protected trees.

If you have no more representations to add, please select this box

Confirm