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Planning for Growth on the Hoo Peninsula Response Form

This response form has two parts to complete below.

Data Protection

Personal information gathered on this form will only be used for planning policy purposes and will be held in accordance with the requirements of the Data Protection Act 2018. Your contact details will be kept confidential but your comments will form part of the public record of the consultation and published on the council's website. Please address any questions or requests regarding our data processing practices to planning.policy@medway.gov.uk.

Details about how your information will be held and used are found on the link below:
https://www.medway.gov.uk/info/200133/planning/714/planning_service_privacy_statement

Part 1 – Your Details

Name:

BRIDGET FOX

Name of organisation (if applicable):

WOODLAND TRUST

Address:

[REDACTED]

Email:

[REDACTED]

Phone:

[REDACTED]

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Part 2 – Your Response

- This public consultation proposes a vision for growth on the Hoo Peninsula.
- The vision should help to make it clear what we want to achieve. It should be clear, realistic and locally distinctive.
- The vision is important because it will guide the objectives, policies and design principles.

The proposed vision is:

By 2037, Hoo St Werburgh will be a thriving rural town, sensitively integrated into the extraordinary landscape of the Hoo Peninsula. A valued place providing homes, jobs and services for vibrant communities. A small town with an attractive choice of travel connections. A place built for the future, and respecting the past.

1. Do you get a clear sense of what the Hoo Peninsula will be like by 2037?

Yes

No

Comments: n/a

2. Does the vision describe the Hoo Peninsula as opposed to anywhere?

Yes

No

Comments: n/a

3. Does the vision reflect your priorities?

Yes

No

Comments: The Woodland Trust supports the aspiration for landscape-led planning, accessible green spaces, planting new native species and protecting ancient woodland with appropriate buffers. We would like to see protection for trees outside woods; greater recognition of the role of trees in the built as well as the natural environment; and specific targets for increasing tree canopy cover and for access to woodland.

4. Is it concise and easy to understand?

Yes

No

Comments:

5. How can we measure success of achieving the vision?

Comments: The Woodland Trust recommends setting targets for tree canopy cover and for access to woodland.

6. Can you set out a better vision for growth on the Hoo Peninsula? Please tell us:

We commend to Medway Council the Trust's planning policy and guidance notes to inform the emerging vision:

- Local Authority Tree Strategies (2016)
- Planners' manual for ancient woodland and veteran trees (2019)
- Residential developments and trees - the importance of trees and green spaces (2019)
- Emergency Tree Plan - how to increase tree cover and address the nature and climate emergency (2020).

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7. Please use the space below to make any other comments on the consultation document:

Principle 1 – Landscape-led development

- i. The Woodland Trust welcomes the approach that seeks to preserve and improve the existing natural environment for people and local wildlife, and provide better public access to natural assets.
- ii. In particular, we welcome the commitment to retaining the green buffer to protect ancient woodland. Areas of natural woodland, in particular ancient woodland, are vulnerable to pollution, encroachment from development, and habitat fragmentation. It is important that any development is located and designed to avoid damaging ancient woodland, providing buffers for designated sites and protecting connectivity between wildlife habitats. Further information is available in the Trust's *Planners' Manual for ancient woodland*. We would propose extending this protection to veteran trees within the development area, in line with the National Planning Policy Framework (NPPF) (paragraph 175c).
- iii. We welcome the commitment to plant native species of trees, including orchards and hedgerows, to enhance quality of the environment and support biodiversity. We would further encourage the specification where possible of UK & Ireland sourced and grown tree stock, to support biodiversity and resilience.
- iv. The Woodland Trust's *Woodland Indicators by Local Authority (2016)* reports that Medway Council has 5.8 per cent woodland cover: *Woodland indicators by parliamentary constituency (2019)* reports that the Rochester & Strood constituency has 3.6 per cent woodland cover. This data is based on the [National Forest Inventory](#) and primarily counts woodland of 0.5 hectares and over so will underestimate smaller areas of tree cover outside woods. However, it is a good guide to the presence of woodland at scale that is effective in carbon capture and storage. As part of the necessary response to the climate and nature emergencies, the Woodland Trust supports the UK Committee on Climate Change call for an increase of tree canopy cover from the current UK average of 13 per cent to 18 per cent. Kent County Council has also adopted this target.
- v. The Trust's Emergency Tree Plan sets out recommended policies to help achieve this, including setting an area-wide tree canopy cover target of up to 20 per cent and a specific target for new development sites of 30 per cent tree canopy cover. Setting such a target for development on the Hoo Peninsula could make a valuable contribution to increasing Medway's tree canopy cover target.
- vi. We welcome the aspiration to provide access to high quality green spaces on the doorstep. The Woodland Trust has developed a Woodland Access Standard to complement English Nature's Accessible Natural Green Space Standard. This recommends that no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size, and 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.
- vii. The Trust's *Woodland Indicators by Local Authority (2016)* reports that 35.54 per cent of the population of Medway has accessible woodland within 500m of where they live. We recommend that 100 per cent of the new development proposed on the Hoo Peninsula should have accessible woodland within 500m.

Principle 3 - Vibrant and sustainable neighbourhoods

- i. We welcome the aspiration to provide a comprehensive pedestrian friendly green infrastructure network and high quality public spaces.
- ii. We suggest adding explicit reference to planting and maintaining trees, integrating the general tree planting aspiration into neighbourhood plans. Urban trees and hedgerows make a significant positive contribution to the appearance of the public realm as part of its green infrastructure; they enhance wellbeing, providing shelter and shade, and play an important part in absorbing CO2 emissions, reducing the impact of pollution and providing wildlife habitats.

Principle 4 – An attractive and tailored built form

- i. We welcome the aspiration that development will be designed to minimise impacts on the environment. However, the absence of reference to the role of trees in particular and green infrastructure in particular is a grave omission from this section. Trees in residential areas provide

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valuable micro-habitats and contribute to habitat connectivity as well as enhancing the quality of the built environment and providing resilience to the impacts of climate change.

- ii. Design guidance should incorporate the protection and extension of green infrastructure including support for SuDS in all new developments, and encouragement of green links, such as tree lines and hedgerows, to frame residential areas and connect existing habitats.
- iii. We recommend adopting a policy that requires the retention of existing trees and hedgerows unless unavoidable, as part of a landscape-led planning approach. We further recommend adopting a greater than 1:1 requirement for tree replacement to compensate for loss of existing trees based upon the size of the trees to be lost.
- iv. In addition, as noted above in our comments on Principle 1, we recommend adopting a target of 30 per cent tree canopy cover for development sites, to be achieved by a mixture of retention of existing trees and hedgerows and new planting.

We welcome opportunities to work with Medway Council officers and members and to contribute further to the emerging Local Plan and to your work on trees and woodlands.

April 2020

Bridget Fox Regional External Affairs Officer - South East

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