

Date: 16 July 2025
Our ref: 518823
Your ref: 20250558



Mr Gary Edwards
Gravesham Borough Council

BY EMAIL ONLY

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Dear Mr Edwards

Planning consultation: Installation of 7 no. glamping pods/retreats and 4 no. barrel saunas with cold plunge for overnight guest use, external decking areas, permeable footpaths and vehicular track, parking and turning area, secure cycle storage and recycling/refuse storage, 2 no. private package treatment plants, landscaping and associated works.

Location: East Court Farm, Church Lane, Gravesend, Kent

Thank you for your consultation on the above dated 01 July 2025 which was received by Natural England on 01 July 2025

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES

The proposed development has the potential to have a harmful effect on terrestrial Sites of Special Scientific Interest (SSSIs) and those Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites that they underpin.

Natural England's statutory advice on these potential impacts is set out below.

Designated Sites

Further information required - recreational disturbance impacts to coastal Special Protection Area(s) (SPAs) and Ramsar Site(s)

This development site is within the zone of influence (Zol) for recreational disturbance impacts to coastal Special Protection Area(s) (SPAs) and Ramsar site(s).

Within this Zol, proposals for any net increase in residential units will have a likely significant effect on the qualifying features of coastal SPA(s) and Ramsar Site(s) through increased recreational disturbance when considered either alone or in combination with other plans and projects.

Your authority has measures in place to manage these potential impacts through a strategic solution which Natural England considers will be effective in preventing adverse impacts on the integrity of the site(s).

Notwithstanding this, Natural England advises that these measures should be formally checked and confirmed by your authority, as the competent authority, via an **appropriate assessment** in view of the [Natural England Access to Evidence - Conservation Objectives for European Sites](#) and in accordance with the Conservation of Habitats & Species Regulations 2017 (as amended).

Natural England must be consulted on the appropriate assessment.

Where the proposal includes bespoke mitigation that falls outside of the strategic solution, Natural England should be consulted.

Reserved Matters applications, and in some cases the discharge/removal/variation of conditions, where the permission was granted prior to the introduction of the strategic approach, should also be subject to the requirements of the Conservation of Habitats & Species Regulations 2017 (as amended) and our advice above applies.

Discretionary Advice

Natural England may provide further advice to the applicant through the discretionary advice service (DAS). Refer to [Developers: get environmental advice on your planning proposals - GOV.UK \(www.gov.uk\)](#) for more information.

Other advice

Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and are included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. A list of priority habitats and species can be found on [Gov.uk](#).

Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

Impact Risk Zones for Sites of Special Scientific Interest

We strongly recommend that local planning authorities (LPAs) use Natural England's Impact Risk Zones for Sites of Special Scientific Interest (SSSI IRZs) (available from the [Natural England Open Data Geoportal \(arcgis.com\)](#) and to use on [MAGIC \(defra.gov.uk\)](#) along with guidance) to decide when to consult Natural England on development proposals that might affect a SSSI.

The SSSI IRZs tool is quick and simple to use and gives instant planning advice as a formal consultation response in certain circumstances. Use of the SSSI IRZs avoids the need for a formal email consultation on some development proposals, reducing unnecessary delays in the planning process. In turn this allows Natural England to concentrate resources on development proposals with the highest risks and opportunities for nature recovery.

[Planning and transport authorities: get environmental advice on planning - GOV.UK \(www.gov.uk\)](#) provides further guidance on when LPAs must consult Natural England on development proposals.

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries, please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

David Reid
Consultations Team