

Date: 3rd March 2026

Ref: 20260141

Site address: Land North Of Cherry Trees Ridge Lane, Meopham, Gravesend, Kent

Mrs Lisa Fisher

Gravesham Borough Council

By email only planning.reps@gravesham.gov.uk



Kent
Wildlife Trust

Dear Mrs Lisa Fisher,

RE: Application Ref. 20260141 – Retrospective change of use for the siting of 4 pitches for Gypsy / Traveller occupation to include one static, one touring caravan and one amenity building on each pitch. Associated changes in land levels and hard / soft landscaping.

The application site contained deciduous woodland, a Habitat of Principal Importance (HPI). HPI for the conservation of biodiversity in England are listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. The NERC Act, as amended by the Environment Act 2021, places a duty on public bodies to conserve and enhance biodiversity. Due regard to habitats contained within the Section 41 list is key in adhering to this 'biodiversity duty'. Situated to the east of the site is the Happy Valley, Meopham Local Wildlife Site (LWS).

Paragraph 187 of the NPPF (2024) states that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing sites of biodiversity value and soils and minimising impacts on and providing net gains for biodiversity.

Paragraph 193 of the NPPF sets out that if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated or, as a last resort, compensated for, then planning permission should be refused.

Policy CS12 of the Core Strategy (2014) states that:

'There will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought, in particular within the Biodiversity Opportunity Areas shown on the Strategic Green Infrastructure Network map and within new development.'

The application is not supported by any ecological information and does not put forward any compensation measures to address the 0.25ha of deciduous woodland that has been permanently lost or the other biodiversity losses that the development has likely resulted in. The submission has not provided any assessment on how the proposal may impact on the adjacent LWS or put forward measures to minimise any impacts that may occur.

The submission of an ecological appraisal at this stage will serve as an inaccurate representation of the biodiversity value of the site, as it should be considered through planning. Whilst it is not possible to retrospectively avoid or mitigate for impacts to legally protected species (such impacts should be dealt with under relevant wildlife legislation) or notable species and habitats, it is possible to retrospectively compensate for losses of biodiversity. The pre-development biodiversity value should be considered using a precautionary approach. If you are minded to grant permission for this application, then we advise that ecological enhancement measures should be provided which far exceed standard mitigation measures.

I hope that the detail within this letter proves to be useful in your assessment of this application. If you have any questions, please do not hesitate to contact me.

Yours sincerely,

Nicholas Trower

Planning and Policy Officer

Kent Wildlife Trust

nicholas.trower@kentwildlife.org.uk