

Gravesham Borough Council  
Planning Department  
Civic Centre  
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Gravesend  
Kent  
DA12 1AU

**By Email:  
31<sup>st</sup> July 2026**

*J25-000111 - Land North of Camer Road \_ GBC Letter Response*

Dear Ms. Parkin,

**Site Reference – Land North of Camer Road Meopham  
Planning Application Reference – 20260207**

The following letter responds to the formal response received from Kent County Council Ecological Advice Service (KCCEAS) on 26<sup>th</sup> June 2026 in respect of application 20260207 (Outline planning application for up to 725 dwellings (Use Class C3), a new two-form entry primary school (Use Class F1), a Local Centre (up to 500sqm of Class E floorspace), the provision of Public Open Space including sport and recreation facilities alongside associated access, landscaping, parking, and infrastructure; with all matters reserved except for access).

The full KCCEAS consultation response is presented in Appendix A. Our associated responses are presented below.

#### **Site Boundaries and Habitat Enhancement**

##### KCCEAS Comment

*“The submitted surveys demonstrate that the greatest ecological interest of the site is the boundaries where reptiles, breeding birds and dormouse have been recorded and from reviewing the green infrastructure plan and the concept master plan it does not appear that the intention is to enhance the boundaries and increase the area of suitable habitat.”*

##### GES Response

The Ecological Appraisal identifies that the majority of protected species interest is associated with the retained site boundaries. The Proposed Development has been designed to retain these boundary habitats whilst substantially increasing their ecological value through additional species-rich native hedgerows, woodland, scrub and species-rich grassland throughout the Site, as indicated in the illustrative Green Infrastructure Plan and the Biodiversity Gain Plan that was submitted with the planning application. The proposals replace extensive areas of intensively managed arable land with a significantly more diverse and enhanced habitats across the Site, and a green infrastructure

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network that is specifically intended to strengthen ecological connectivity throughout the Site. The detailed design and specification of these habitats will be secured through the Reserved Matters process together with a Landscape and Ecological Management Plan.

### **Connectivity for Badgers**

#### KCCEAS Comment

*“Active badger setts have been recorded within the centre and the northwest of the site and it is likely that the two setts are connected. The submitted illustrative plans do not demonstrate how connectivity through the site for badgers will be maintained and how the setts will be protected from disturbance – particularly from an increase in recreation..”*

#### GES Response

The application has been submitted in outline with all matters except access reserved. The illustrative masterplan demonstrates that a continuous green corridor can be retained through the centre of the site linking the retained woodland and boundary habitats. Detailed badger mitigation, including protection of retained setts, maintenance of commuting routes, fencing where necessary and lighting controls, will be developed during the detailed design process and secured through an Ecological Mitigation Strategy at the Reserved Matters stage. The precise design of public access will be developed to avoid disturbance to retained badger setts. Where required, areas of structural planting, fencing and signage will be incorporated to discourage access into sensitive ecological areas.

Given the above, there is no reason why functional connectivity for badgers cannot be maintained post-development.

### **Skylark Mitigation**

#### KCCEAS Comment

*“Farmland birds have been recorded within the site and a bespoke skylark mitigation area has been proposed within the north west of the site. We are supportive of this proposal however we question what measures will be in place to ensure that residents are unable to access this area – particularly within the breeding season. We advise that if this is not achievable off site skylark mitigation will be required to be secured via a legal agreement. We defer to GBC on whether they believe measures can be put in place to prevent access in to the skylark mitigation area.”*

#### GES Response

We welcome the broadly positive comments received from KCCEAS with regard to the bespoke skylark mitigation area. With regard to prevention of public access, the Green Infrastructure Plan shows a fenced skylark mitigation area together with interpretation signage explaining its ecological purpose. These measures are specifically intended to discourage recreational access whilst maintaining suitable breeding habitat. The detailed specification of fencing, signage and long-term management can be secured through a Landscape and Ecological Management Plan, and/or Ecological Mitigation Strategy and secured by planning condition.

KCCEAS Comment

*"The area of open space/habitat creation are limited within the site and it is our view that they must be increased."*

GES Response

The existing Site is currently dominated by intensively managed arable cultivation, with the principal ecological interest restricted to the field boundaries and small areas of retained woodland. The Proposed Development replaces substantial areas of arable land with an extensive, interconnected network of semi-natural habitats. The submitted Biodiversity Metric demonstrates the creation of approximately 26.75ha of habitat and green infrastructure, comprising approximately 10.50ha of modified grassland, 5.61ha of other neutral grassland, 1.94ha of new lowland mixed deciduous woodland, 1.43ha of vegetated SuDS, 1.33ha of mixed scrub, 0.21ha of traditional orchard, 5.55ha of vegetated gardens, 0.19ha of allotments, together with 318 new rural trees, extensive new native hedgerows and the retention and enhancement of existing woodland and boundary habitats.

These habitats are not isolated landscape features but form an integrated green infrastructure network extending throughout the development, connecting retained woodland blocks, hedgerows and open spaces to provide continuous habitat corridors for commuting wildlife.

Importantly, the submitted Biodiversity Metric demonstrates that the proposed habitat creation delivers an overall increase of 32.55 habitat units, representing a 29.05% net gain in habitat units, significantly exceeding the statutory requirement for a minimum 10% Biodiversity Net Gain. The metric confirms that the proposals satisfy the habitat trading rules and that sufficient land is available within the site to accommodate both development and the proposed ecological enhancements.

Accordingly, it is not considered that the evidence supports the assertion that habitat creation within the site is "limited". Rather, the submitted proposals demonstrate habitat creation and enhancement which increases both the extent and diversity of semi-natural habitats compared with the existing predominantly arable baseline, whilst maintaining habitat connectivity across the site.

**Biodiversity Net Gain**KCCEAS Comment

*"The metric has detailed that most habitats to be created onsite will achieve a moderate or good condition. The proposal is for up to 725 dwellings and therefore there will be high recreational pressure and all the habitats within the site may not meet this condition. The biodiversity gain plan will have to demonstrate that these conditions can be met if they can not the BNG value of the site will decrease."*

GES Response

Recreational pressure has been considered during preparation of the BGP. Habitat condition assessments within the Biodiversity Metric represent achievable target conditions based upon the proposed management regime, zoning of recreational uses and long-term management secured through the Landscape and Ecological Management Plan and Biodiversity Gain Plan.

We also note the comments provided by KCCEAS with regard to the newly published LNRS and confirm that the Biodiversity Metric will be updated where necessary to reflect the Kent and Medway LNRS

and any amendments arising through the iterative design process. The Biodiversity Gain Plan submitted post-permission will demonstrate that the target habitat conditions are achievable and appropriately managed for the statutory 30-year period.

**Integrated bird and bat boxes**KCCEAS Comment

*"The biodiversity net gain assessment has made recommendations for ecological enhancement features to be incorporated into the site but as the site is for up to 750 homes we advise that 10 bat and bird boxes is not sufficient. It is our view that all buildings must have at least one integrated enhancement feature and enhancement features over and above what is required for mitigation purposes must be installed through the site."*

GES Response

We are happy to increase the number of ecological enhancement features to significantly exceed the minimum currently illustrated. The precise number and distribution of integrated bat and bird features will be determined during detailed design but will be proportionate to the scale of the development and secured by planning condition. It is anticipated that 1 x integrated feature per dwelling (or equivalent thereof) is achievable.

We trust this provides the clarity required and look forward to hearing from you soon.

Yours sincerely,



Lorna Roberts BSc (Hons) MSc ACIEEM  
Associate Director

*J25-000111\_GBC Letter Response\_LR\_JP*

# Appendix A – KCCEAS Comments



## ECOLOGICAL ADVICE SERVICE

**TO:** Katherine Parkin  
**FROM:** Helen Forster  
**DATE:** 25 June 2026  
**SUBJECT:** Land North Of Camer Road Meopham 20260207

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*The following is provided by Kent County Council's Ecological Advice Service (KCC EAS) for Local Planning Authorities. It is independent, professional advice and is not a comment/position on the application from the county council. It is intended to advise the relevant planning officer(s) on the potential ecological impacts of the planning application and if sufficient/appropriate ecological information has been provided.*

*Any additional information, queries or comments on this advice that the applicant or other interested parties may have must be directed in every instance to the planning officer, who will seek input from the EAS where appropriate and necessary.*

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We have reviewed the ecological information and we advise that we have concerns that the indicative layout does not demonstrate that the proposal will retain the species interest of the site or ensure connectivity through the site.

### **Protected/Notable Species**

The ecological survey has carried out badger, dormouse reptile, GCN, Breeding birds, bat surveys and the surveys have detailed the following has been recorded within the site

- Active Main Badger sett in the centre of the site
- Active Outlier Badger Sett in the NE of the site
- At least 6 foraging / commuting bat species
- At least 6 trees with roosting potential.
- 36 species recorded during the breeding bird survey of which 28 were confirmed, possible or probable breeders.
- Dormouse
- Low population of common lizards

No suitable ponds to support GCN were recorded within 250m of the development site.

The ecological surveys provide a good understanding of the ecological interest of the site. We highlight that as only 4 rather than the recommended 6 breeding survey visits were carried out the breeding bird interest may be greater than detailed within the report. However we accept that the survey information does provide an understanding of the species use of the site.

The submitted surveys demonstrate that the greatest ecological interest of the site is the boundaries where reptiles, breeding birds and dormouse have been recorded and from reviewing the green infrastructure plan and the concept master plan it does not appear that the intention is to enhance the boundaries and increase the area of suitable habitat.

Active badger setts have been recorded within the centre and the northwest of the site and it is likely that the two setts are connected. The submitted illustrative plans do not demonstrate how connectivity through the site for badgers will be maintained and how the setts will be protected from disturbance – particularly from an increase in recreation.

We understand that this is an outline application but it is our view that the illustrative plans must demonstrate that site boundaries can be enhanced and increased in size to increase suitable habitat for species found within the site and maintain connectivity through the site.

Farmland birds have been recorded within the site and a bespoke skylark mitigation area has been proposed within the north west of the site. We are supportive of this proposal however we question what measures will be in place to ensure that residents are unable to access this area – particularly within the breeding season. We advise that if this is not achievable off site skylark mitigation will be required to be secured via a legal agreement. We defer to GBC on whether they believe measures can be put in place to prevent access in to the skylark mitigation area.

The area of open space/habitat creation are limited within the site (as highlighted above) and it is our view that they must be increased. However we highlight that habitat creation agreed as part of this proposal will need to be actively managed and monitored to retain the ecological interest of the site.

### **Biodiversity Net Gain**

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications<sup>1</sup> for development (unless exempt<sup>2,3</sup>), must deliver at least a 10% biodiversity net gain (BNG), shown via use of the Statutory Biodiversity Metric prior to commencement of any development.

Significant on-site gains, and all off-site gains will need to be secured for at least 30 years.

Having reviewed submitted information<sup>4</sup>, we consider a 10% biodiversity net gain is a statutory requirement of this proposed development.

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<sup>1</sup> All planning applications for major development (unless exempt) submitted on or after 12<sup>th</sup> February 2024 in England, and all minor applications (unless exempt), submitted on or after the 2<sup>nd</sup> April 2024.

<sup>2</sup> Biodiversity net gain: exempt developments - GOV.UK ([www.gov.uk](http://www.gov.uk))

<sup>3</sup> The Biodiversity Gain Requirements (Exemptions) Regulations 2024 ([legislation.gov.uk](http://legislation.gov.uk))

<sup>4</sup> References to the biodiversity value of any habitat or habitat enhancement within this section of the advice note refer to the value as calculated in accordance with the biodiversity metric.

We have produced the following table to *show whether the applicant has met the minimum validation requirements, expected information standards in line with planning practice guidance and any applicable national or local policies.*

| Information Needed                                                                                                                                                                                                                                                                  | Provided | Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition.                                                                                                                                 | Yes      | A BNG assessment has been submitted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| The pre-development biodiversity value(s), <u>either on the date of application or earlier proposed date (as appropriate).</u>                                                                                                                                                      | Yes      | A site visit was carried out by a suitably qualified ecologist in April 2025. This is considered acceptable to inform the habitat baseline for this application given the site size, location and habitats reported.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date.                                                                                                                                                            | N/A      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <u>The completed metric calculation tool</u> showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value. |          | <p><u>Baseline Habitats</u></p> <p>We are content with the baseline habitat classifications which have detailed that the majority of the site is arable but there is also lowland mixed deciduous woodland, modified grassland, mixed scrub and native hedgerows.</p> <p>We highlight that the Kent and Medway Local Nature Recovery Strategy (LNRS) was published 28<sup>th</sup> November 2025. The LNRS changes how strategic significance is considered and any BNG assessments produced <b>after</b> the LNRS was published can no longer use <i>Location ecologically desirable but not in local strategy</i>. All baseline information must be set to <i>Area/compensation not in local strategy/ no local strategy</i></p> <p>The submitted metric has used <i>Formally identified in local strategy</i> within the baseline information. However The LNRS was published after the 'relevant date' (e.g. the date the metric was produced) therefore the 'pre-development' biodiversity value does not need to be updated as part of this application. (further details set out in this</p> |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |     |                                                                                                         |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|---------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |     | <a href="#">guidance</a> ).                                                                             |
| <p>A statement whether activities have been carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value ('<u>degradation</u>'), and where they have:</p> <ul style="list-style-type: none"> <li>• a statement to the effect that these activities have been carried out;</li> <li>• the date immediately before these activities were carried out;</li> <li>• the pre-development biodiversity value of the onsite habitat on this date;</li> <li>• the completed metric calculation tool showing the calculations, and</li> <li>• any available supporting evidence of this.</li> </ul> | N/A | None reported or visible on aerial imagery dated March 2026 (Google Earth Pro, accessed June 2026 date) |
| <p>A description of any <u>irreplaceable habitat</u> (as set out in <u>column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024</u>) on the land to which the application relates, that exists on the date of application, (or an earlier date).</p>                                                                                                                                                                                                                                                                                                                                                    | N/A | None reported.                                                                                          |
| <p>Plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).</p>                                                                                                                                                                                                                                                                                                                                                                                                                           | Yes |                                                                                                         |

We advise that sufficient information has been provided to meet the requirements for mandatory BNG.

The submitted metric has detailed that a BNG of over 10% can be achieved for both habitats and hedgerows.

However we highlight the following points which may alter the BNG value of the site:

- The LNRS has now been published and therefore the strategic significance must be reviewed and where necessary updated on the creation and enhancement tabs. If the strategic significance has to be down graded from *Formally Identified in Local Strategy* to *Area/compensation not in local strategy/ no local strategy* It will decline the BNG value of the site.
- The metric has detailed that most habitats to be created onsite will achieve a moderate or good condition. The proposal is for up to 725 dwellings and therefore there will be high recreational pressure and all the habitats within the site may not meet this condition. The biodiversity gain plan will have to demonstrate that these conditions can be met if they can not the BNG value of the site will decrease.
- The recommendations we have made regarding habitat creation to support protected/notable species will alter the information in the metric. Any changes to the proposed layout will have to be reflected within the metric.

We advise that these points can be addressed via the biodiversity gain plan (if planning permission is granted) but highlight that if 10% BNG can not be achieved off site habitat

creation will be required. Details of off site habitat creation can be found at the end of the report.

If off site habitat creation is used details of how the offsite habitat creation will be implemented must be agreed and registered on the biodiversity gain site register prior to the submission of the biodiversity gain plan (if granted). [Search the biodiversity gain sites register - GOV.UK](#)

## **BIODIVERSITY AND ENHANCEMENTS**

Under section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and paragraphs 187 and 193 of the National Planning Policy Framework (NPPF) 2024, biodiversity should be maintained and enhanced through the planning system.

The biodiversity net gain assessment has made recommendations for ecological enhancement features to be incorporated into the site but as the site is for up to 750 homes we advise that 10 bat and bird boxes is not sufficient. It is our view that all buildings must have at least one integrated enhancement feature and enhancement features over and above what is required for mitigation purposes must be installed through the site.

We recommend that a letter is submitted confirming the minimum number of enhancement features to be incorporated in to the site.

**Helen Forster MCIEEM**  
**Biodiversity Officer**

This response was submitted following consideration of the following documents:

- Green Infrastructure Plan; Iceni; December 2025
- Technical Appendix 10.1: Ecological Appraisal; Greenspace Ecological Solutions; February 2026
- Landscape Parameter Plan; Iceni; January 2026
- Chapter 10 Ecology; Iceni; February 2026
- Biodiversity Gain Plan; Greenspace Ecological Solutions; February 2026

## **OFF-SITE GAINS (NEEDS TO BE REGISTERED)**

*'Off-site' biodiversity gains are any BNG measures proposed outside of the red line boundary. The statutory Biodiversity Gain Plan (BGP) must contain the biodiversity gain site register reference number for any offsite units if these are used. BNG sites must be registered here: [Register a biodiversity gain site - GOV.UK](#).*

*If off-site habitat creation is required, we direct the applicant towards the Kent Biodiversity Net Gain Site Register<sup>69</sup> available on the Making Space for Nature in Kent and Medway website. Biodiversity Net Gain Guidance for Kent is also available on this website.*

*If any off-site habitat creation/enhancement is proposed outside of the LPA boundary/National Character Area of the impact site these will be subject to spatial risk penalties.*

*Where off-site gains are secured on land owned by the developer (but outside the redline boundary), or on third-party land (but not through a 'habitat bank operator'<sup>70</sup>), the*

*biodiversity net gain needs to be subject to a deed of conservation covenants or Section 106 (as appropriate). Section 106 agreement templates are available on the Planning Advisory Service website. It is generally inappropriate to rely solely on conditions to secure off-site biodiversity net gain. The following needs to be secured as part of the off-site biodiversity net gain:*

- The submission of a habitat management and monitoring plan (HMMP);*
- Notice of HMMP implementation and completion of the habitat creation and enhancement works;*
- Timescales for completion of habitat creation, and the submission of a completion report;*
- Submission of a monitoring report;*
- A habitat monitoring fee to be paid to the local planning authority on every habitat management monitoring event.*

*The HMMP shall be submitted when the general BNG condition is discharged and shall contain the following information <sup>71</sup>:*

- (a) a non-technical summary;*
- (b) the roles and responsibilities of the people or organisation(s) delivering the HMMP;*
- (c) the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;*
- (d) the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and*
- (e) the monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the local planning authority.*

*Monitoring reports shall be submitted to local planning authority in writing in accordance with the methodology and frequency specified in the approved HMMP.*

*Where off-site gains are to be secured through a ‘habitat bank operator’ (which has its own legal agreement and HMMP), no additional conditions or section 106 obligations are required, above a condition requiring biodiversity net gain to be delivered as set out in the planning application.*

*The submission of provisional/draft legal documents outlining the agreement between the applicant and the provider of any off-site gains are advisable prior to determination to confirm that the proposed route to delivering net gain is feasible, but this information is not required until submission of the pre-commencement Biodiversity Gain Plan.*