

Date: 4th June 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.

A planning statement has now been submitted in support of the application. The document states that a preliminary ecological appraisal has been completed which did not identify any protected species impacts that could not be dealt with by means of a planning condition or a biodiversity enhancement plan. The document also states that due to the works being retrospective statutory BNG does not apply but that there is opportunity to provide on-site benefits such as bird and bat boxes where required.

The preliminary ecological appraisal has not been submitted in support of the application. It is therefore unclear whether this appraisal was carried out prior to the site being cleared. If carried out after the site was cleared it will not provide any understanding as to the full impact of the development on the biodiversity of the site.

With respect to BNG it is recognised that statutory BNG does not currently apply to retrospective applications. However, there is still a requirement within the NPPF to provide a net gain for biodiversity while the Local Plan seeks opportunities to enhance, restore, re-create and maintain habitats within the borough. The submission has not demonstrated that it complies with these policy requirements.

It is recommended that enhancement measures are submitted for approval prior to the determination of the application to assess whether they are appropriate, achievable and can address the loss of habitat that has occurred. Given that a habitat of principal importance, as listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, has been lost any enhancement measures must go beyond standard landscaping and the provision of a few bird and bat boxes.

As set out within our previous representation the submission has not provided any assessment on the impacts of the development to the adjacent LWS or put forward measures to minimise any impacts that may occur to this designated site.

I hope that our comments prove 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