

**From:** Planning Consultation SEL  
<planningconsultationSEL@forestrycommission.gov.uk>  
**Sent:** 09 September 2025 11:24:37 UTC+01:00  
**To:** "Planning Admin" <planning.admin@gravesham.gov.uk>  
**Subject:** FW: Planning Application Consultation for application 20250802  
**Attachments:** ufm31\_Conult\_External.pdf

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Dear Gravesham Council,

Thank you for taking the time to consult the Forestry Commission regarding this application. We are currently receiving a significant number of planning consultations. We are triaging all requests and may have further comments as a result; however, this response should be considered to be the Forestry Commission's formal response to this consultation unless we provide subsequent comments.

**As a Non-Ministerial Government Department, we do not provide an opinion supporting or objecting to planning applications.** Instead, we provide advice on the potential impact that proposed developments could have on trees and woodland using our local knowledge and expertise, planning policy and legislation that could be relevant and measures that could help to avoid or limit impacts and result in overall gains wherever possible.

The planning authority should consider the following policy and guidance as part of their decision-making process for this application (updated March 2025):

1. **Ancient woodlands, ancient trees and veteran trees are irreplaceable habitats.** Paragraph 193(c) of the NPPF sets out that development resulting in the loss or deterioration of irreplaceable habitats should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists. In considering the impacts of the development on Ancient Woodland, Ancient and Veteran trees, the planning authority should consider direct and indirect impacts resulting from both construction

and operational phases. Impacts can be caused by activities outside of areas designated as ancient woodland (eg within buffer zones), or within open areas of ancient woodland, which can result in loss or deterioration of ancient woodland.

Please refer to Natural England and Forestry Commission joint [Standing Advice for Ancient Woodland and Ancient and Veteran Trees](#), updated in January 2022. The Standing Advice can be a material consideration for planning decisions, and contains advice and guidance on assessing the effects of development, and how to avoid and mitigate impacts. It also includes an [Assessment Guide](#) which can help planners assess the impact of the proposed development on ancient woodland or ancient and veteran trees in line with the NPPF.

The Town and Country Planning (Consultation) (England) Direction 2024 (published January 2024) requires local planning authorities in England to consult the Secretary of State before granting planning permission for certain types of development, including development that affects ancient woodland: [The Town and Country Planning \(Consultation\) \(England\) Direction 2024 - GOV.UK \(www.gov.uk\)](#)

2. **Existing trees should be retained wherever possible, and opportunities should be taken to incorporate trees into development.** Trees and woodlands provide multiple benefits to society such as storing carbon, regulating temperatures, strengthening flood resilience and reducing noise and air pollution.<sup>1[1]</sup> Paragraph 136 of the NPPF seeks to ensure new streets are tree lined, that opportunities should be taken to incorporate trees elsewhere in developments, and that existing trees are retained wherever possible. Appropriate measures should be in place to secure the long-term maintenance of newly planted trees. The Forestry Commission may be able to give further support in developing appropriate conditions in relation to woodland creation, management or mitigation.
  3. **Biodiversity Net Gain (BNG):** As of the 12<sup>th</sup> of February 2024, major development (unless exempt) will have to deliver 10% net gain in biodiversity. Paragraph 187(d) of the NPPF also sets out that planning (policies and) decisions should minimise impacts on and provide net gains for biodiversity. Paragraph 187(d) encourages development design to integrate opportunities to improve biodiversity, especially where this can secure net gains for biodiversity. BNG offers opportunities for protecting (retaining) trees and woodlands, as well as new planting and enhancement of existing trees and woodlands, and
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the planning authority also should consider the **wider range of benefits trees, hedgerows and woodlands can provide** as part of delivering good practice biodiversity net gain requirements ***in addition*** to contributing to the BNG figure. Ancient woodlands (including PAWS) and ancient & veteran trees are already recognised as irreplaceable habitats and as such are exempt from the net gain requirement.

We would also like to remind applicants that tree felling may require a [felling licence](#) from the Forestry Commission.

For all planning applications, we advise the Council to carefully consider the previous usage of sites, including historical satellite imagery, to consider if development is being proposed on recently felled woodland. Please contact us if you suspect this is the case. If evidence suggests that sites have been degraded since January 2020, the BNG baseline may need to reflect this: [Biodiversity Net Gain FAQs - Frequently Asked Questions | Local Government Association](#)

If you have any questions regarding our advice or concerns that are not covered by the above, please contact us again highlighting any specific issues for us to consider in more detail.

Yours sincerely,

South East and London Area Team  
Forestry Commission



[1] Recent studies have shown that the economic value of individual trees outside of our forests and woodlands has been calculated as £3.8 billion [Economic value of the UK's individual trees revealed for first time - Forest Research](#).

-----Original Message-----

From: planning.admin@gravesham.gov.uk <planning.admin@gravesham.gov.uk>

Sent: 04 September 2025 12:14

To: Planning Consultation SEL <planningconsultationSEL@forestrycommission.gov.uk>

Subject: Planning Application Consultation for application 20250802

This Message originated outside your organisation.

Please refer to the attached Consultation Document for reference 20250802 at Blackthorn Farm.

Regards,

Planning Team, Gravesham Borough Council.

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