

From: James Young <james.young@gravesham.gov.uk>
Sent: 09 September 2025 11:53:47 UTC+01:00
To: "Planning Admin" <planning.admin@gravesham.gov.uk>
Cc: "Amanda Cue" <amanda.cue@gravesham.gov.uk>
Subject: RE: Planning Application Consultation for application 20250802

Hi Amanda,

I have reviewed the proposed Blackthorn Farm planning application (20250802) and provided a commentary with regards the biodiversity net gain, tree preservation, and green infrastructure, focusing on the area within the red line boundary.

1. Positives and Opportunities Identified

The masterplan demonstrates a clear intent to integrate green infrastructure, which is a significant positive. The proposed features align well with GBC and Kent planning policy and ecological best practice.

- **Strategic Tree Belt Integration:** The inclusion of a "tree belt" within the masterplan is a major strength. This suggests a move beyond isolated tree planting towards creating a connected, structural landscape. If composed of native species, this belt could act as a vital wildlife corridor, facilitating the movement of species, improving genetic diversity, and enhancing resilience to climate change.
- **Buffer Planting and Enhancements:** The commitment to "enhancements to buffer planting" is crucial. Effective buffers mitigate visual and noise pollution for new residents and, more importantly, can protect sensitive adjacent habitats (e.g., from agricultural runoff, human disturbance). This shows consideration for the site's context.
- **Peri-Urban Tree Planting:** "Peri-urban tree planting to line properties" offers multiple benefits. It will soften the hard lines of the development, provide immediate aesthetic value, contribute to urban cooling, and create a sense of place. This approach is far superior to barren streetscapes.
- **Accessible Green Space:** Providing "improvement to the general and communal areas with accessible green space" is fundamental for resident well-being and fostering a connection with nature. These spaces, if designed with biodiversity in mind (e.g., native planting, wildflower areas, log piles), can serve as valuable "stepping stone" habitats for insects, birds, and small mammals within the wider ecological network – although these details haven't been outlined.

2. Critical Considerations and Potential Gaps

While the framework is positive, the devil is in the detail. The following points must be clarified and strengthened to ensure a genuinely biodiversity-positive outcome.

- **Tree Preservation vs. New Planting:** The commentary focuses on new planting but is silent on existing mature trees within the red line boundary.
 - Question: Has a detailed arboricultural survey (to BS5837:2012) been conducted?
- **Biodiversity Net Gain (BNG) Mandate:**
 - Question: Does the proposed tree belt and green space provide a sufficient increase in habitat units to meet the 10% BNG mandate, especially after accounting for any habitat loss from construction?

3. Commentary on Leisure Provision and S106

Your point regarding leisure provision is astute and touches on a key planning mechanism.

- The assessment that nearby facilities (Culverstone Green, Camer Park) mitigate the need for extensive on-site formal leisure provision is valid. This is a standard and often acceptable planning approach.
- Could I suggest a recommendation regarding a Section 106 (S106) agreement? Should the application be granted, it would be entirely appropriate for financial contributions to be secured to enhance these existing public facilities.
 - Proposed S106 Focus: Contributions could be ring-fenced for:
 1. Biodiversity Enhancements: Native tree planting, wildflower meadow creation, or habitat management (e.g., coppicing, pond restoration) at Camer Park or Culverstone Green.
 2. Accessible Natural Play: Incorporating natural play features (log climbing structures, sensory trails) that blend with the green space, rather than traditional manufactured equipment.
 - This approach ensures the development contributes positively to the wider ecological and social network, benefiting both new and existing residents.

Conclusion and Summary

The masterplan presents a promising framework that recognises the value of green infrastructure. However, its success from a biodiversity and preservation perspective is entirely contingent on the following:

1. A commitment to preserving existing mature trees being explicitly demonstrated and guaranteed through robust construction management plans.
2. A detailed Biodiversity Net Gain Plan that quantifiably proves a 10%+ gain, ensuring the new tree belts and green spaces are designed for maximum ecological function, not just aesthetics.
3. The adoption of the use of S106 process to enhance nearby green infrastructure, ensuring a net positive legacy for the entire community.

I have tried to be as comprehensive with these comments given the media coverage about the proposed plans.

Let me know if you require anything else or it formatted in a different way.

Kind regards,

James

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

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

Sent: 04 September 2025 12:12

To: James Young <james.young@gravesham.gov.uk>

Subject: Planning Application Consultation for application 20250802

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

Regards,
Planning Team, Gravesham Borough Council.