

Rebecca Harrison
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Planning Department,
Civic Centre,
Gravesend,
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17th January 2025

Dear Rebecca,

National Grid planning application (ref 20231313). Tilbury to Gravesend Cable Tunnel.

Further to your request, I have set out below National Grid's view on the implications of the December 2024 amendments to the National Planning Policy Framework (NPPF) for our planning application above.

NPPF Paragraph 155

The new wording in NPPF paragraph 155 is provided below.

155. The development of homes, commercial and other development in the Green Belt should not be regarded as inappropriate where:

- a) The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
- b) There is a demonstrable unmet need for the type of development proposed;*
- c) The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework and*
- d) Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 below.*

Within this new paragraph, Part (a) is of most relevance to National Grid's application site.

Part (b) relates to 'unmet need' which is terminology typically used to describe local housing and service infrastructure. A wider interpretation could be to consider unmet need for electrical infrastructure regionally and nationally. Provision of National Grid's infrastructure in this location is of national significance and a crucial part of the government's 2030 decarbonisation commitments. This point could be considered further by the Council.

Part (c) relates to accessibility and travel mode choice, and is not directly relevant to National Grid's application. Gravesend town has a mainline train station and local foot passenger crossing to Tilbury. However, whilst the application site is accessible via bus services from Gravesend town and a short walk along the Thames and Medway Canal Road, the proposed infrastructure would be unmanned when operational and so Part (c) does not form an important consideration for this application site.

Finally, Part (d) relates to the 'Golden Rules' which are described in NPPF paragraphs 156-157 as relating only to the provision of housing.

For these reasons, the rest of this letter considers only Part (a) of paragraph 155.

To satisfy the requirements of Part (a), we must establish that National Grid's application site is both on grey belt land and would not undermine the purposes of the remaining Green Belt. Each of these aspects is considered in turn below.

(1) Is the application site on Grey Belt land?

Grey Belt land is defined on page 73 of the NPPF as:

Land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143.

The land upon which National Grid's application is located meets the definition of 'any other land'. Purposes (a), (b) and (d) in paragraph 143 are listed in Table 1 below alongside consideration of the application site.

Table 1

Green Belt Purpose in NPPF Paragraph 143	Contribution National Grid's Planning Application Site makes to this purpose	Strength of Contribution
a) to check the unrestricted sprawl of large built-up areas;	It is questionable whether the immediate surrounds of the application site could be described as being a 'large built-up area'. Existing development along the Thames and Medway Canal Road is linear and heavily constrained by the railway, canal and River Thames. Land south-west of the application site is not built up nor categorised as Green Belt and so it may not be appropriate to describe the surrounds as a large built-up area. However, should the Council wish to apply this definition in the context of the wider town of Gravesend, explanation is provided below on why the application site does not currently perform an important function in restricting sprawl. The site is a relatively small area located adjacent to the rural/urban boundary as defined within the Council's Local Plan Policies Map (2014), and, whilst the Council's 2018 Stage 1 Green Belt Study identifies the wider Green Belt parcel as being important in restricting sprawl, the application site itself consists of electrical infrastructure including high voltage overhead power lines which align with the industrial setting to the west. Because the site is already developed with urban characteristics, it cannot be described as functioning effectively at restricting sprawl. The position of the site adjacent to the urban edge should in theory promote a buffer effect. However, the Green Belt boundary is not well defined in this location. The 2018 report defines the current western Green Belt boundary as 'weak' and the existing industrial development to the west as 'remote from existing settlements'. The relatively remote location and existing land uses are not conducive to large scale development and mean that the application site is not under significant threat from urban development. For these reasons, in its current state the application site does not contribute strongly to the prevention of sprawl.	Weak
b) to prevent neighbouring towns merging into one another;	The nearest neighbouring town that could be considered to have potential risk for coalescence with Gravesend is the town of Strood. This is approximately 5km south east of the application site and so too distant to create a coalescence risk.	Minimal/No Contribution

Green Belt Purpose in NPPF Paragraph 143	Contribution National Grid's Planning Application Site makes to this purpose	Strength of Contribution
d) to preserve the setting and special character of historic towns;	Land to the west of the application site is industrial in nature and includes the Met Police and Sea Cadet Training centres, and commercial aggregate facilities with wharfs. Buildings associated with these units are relatively tall thus providing an effective buffer to the Conservation Area within the centre of Gravesend town. The setting and special character of Gravesend town is not at risk.	Minimal/No Contribution

Paragraph 143 also states that the definition of 'Grey Belt' excludes land where '*the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development*'. Table 2 below demonstrates why none of these areas or assets are applicable to National Grid's planning application site.

Table 2

Area or Assets in NPPF Footnote 7	Applicability to National Grid's Planning Application Site	Strong reason for refusal or restriction?
Policies relating to habitats and sites and those sites listed in paragraph 189 i.e. National Parks, the Broads and National Landscapes	Policies relating to habitats are found within paragraphs 193-195 of the new NPPF (Chapter 15). No significant or directly relevant updates were introduced to these paragraphs in Dec 2024. Sites listed in paragraph 189 are not relevant to the application site. KCC Ecological Advice Service is satisfied that mitigation will be sufficient to avoid impacts upon biodiversity (reptiles) in the long term. See page 4 of KCC comments dated 21/11/24.	No
Sites of Special Scientific Interest (SSSI)	At its closest point, South Thames Estuary and Marshes SSSI is located 30m south of the application site but separated by HS1 railway and the Thames and Medway Canal. Following detailed noise and lighting impact assessments, significant effects on the SSSI are not likely. KCC Ecological Advice Service is satisfied that a detailed CEMP secured by condition including noise fencing will be sufficient to avoid and mitigate impacts upon the SSSI. See page 7 of KCC comments dated 21/11/24.	No
Local Green Space	None in the surrounding area	No
National Landscape	None in the surrounding area	No
National Park or Heritage Coast	None in the surrounding area	No
Irreplaceable habitats e.g. ancient woodland, veteran trees, blanket bog, salt marsh	One small veteran tree is located within the red line boundary. However, this will be adequately protected during the works.	No

Area or Assets in NPPF Footnote 7	Applicability to National Grid's Planning Application Site	Strong reason for refusal or restriction?
	KCC Ecological Advice Service is satisfied that a detailed CEMP secured by condition will be sufficient to avoid and mitigate impacts upon the veteran tree. See page 7 of KCC comments dated 21/11/24.	
Designated heritage assets and other heritage assets in footnote 75 i.e. non designated heritage assets equivalent significance to scheduled monuments	None in the surrounding area	No
Areas at risk of flooding or coastal change	Thames flood defence wall north of the application site provides adequate protection to the application site in normal circumstances. The Environment Agency is satisfied with the principle of development subject to a planning condition for discharge prior to operation which would address the 1 in 1000 year flood event in which flood water breaches the existing flood wall. See page 1 of EA comments dated 24/09/24.	No

For the reasons outlined above, the National Grid application site is on land that does meet the definition of 'grey belt' and thus the first qualifying matter in NPPF paragraph 155 Part (a) has been met.

(2) Would the application fundamentally undermine the purposes of the remaining Green Belt?

In 2020, Gravesham published a Stage 2 Green Belt Study¹ which considered the application site. However, the area of land in question was not subject to an assessment. This is because the application site is categorised by a single feature that could preclude development – namely, Flood Zone 3.

Since submitting this planning application, National Grid has had several meetings with the Environment Agency and agreed an approach to developing in this location that would be acceptable. Likewise, written communications have also taken place with the Lead Local Flood Authority to establish how drainage should be designed to make development acceptable in principle.

Therefore, the principle for the acceptability of the development by the relevant consultees has been established. However, due to exclusion from the 2022 study, up to date detail on the purposes of this parcel of greenbelt are not known. Instead, the less detailed Stage 1 Green Belt Study from 2018² needs to be referred to.

For this reason, all 5 of the purposes have been considered in Table 3 below. Table 3 establishes whether the development being proposed by National Grid at the application site would fundamentally undermine any of the Green Belt purposes.

¹ https://localplan.gravesham.gov.uk/qf2.ti/f/1210690/83731301.1/PDF/-/Gravesham_Green_Belt_Report_Final.pdf

² https://localplan.gravesham.gov.uk/qf2.ti/f/912450/36343845.1/PDF/-/Gravesham_Green_Belt_Study_April_2018.pdf

Table 3

Green Belt Purpose in NPPF Paragraph 143	How would National Grid's proposed development affect the remaining Green Belt	Is the purpose fundamentally undermined?
a) to check the unrestricted sprawl of large built-up areas;	See Table 1 The proposed permanent new infrastructure would not extend beyond the edge of built development that is currently defined by National Grid's existing tunnel head house and Cable Sealing End compound. Likewise, the infrastructure would not facilitate further unrestricted sprawl. These points are considered in more detail in Part (c) below.	No
b) to prevent neighbouring towns merging into one another;	See Table 1	Not relevant
c) to assist in safeguarding the countryside from encroachment;	The application site is influenced by urban characteristics to the west and also within the red line boundary in the form of the existing Cable Sealing End Compound and associated existing electrical infrastructure. Overhead power lines are currently located both within and adjacent to the application site in the east, and all these urbanising features diminish the role the site plays in maintaining a rural environment. Because of this, the contribution of the application site to the open landscape is limited and the proposed development would be in-keeping with the current setting. There are natural boundaries both within and adjacent to the application site that currently help protect the land from urban encroachment (waterbodies). Likewise, the HS1 railway forms a strong barrier to the south. These boundaries would remain once the proposed development is operational. The application site is located at the end of a road that would be difficult to widen to facilitate further development. For this reason, the land is not deemed to be under threat from further urban development that could be facilitated by National Grid's proposed development. Indeed, the presence of National Grid's overhead power lines currently form a deterrent to urban development in this location. Whilst the Council's 2018 Stage 1 Green Belt Study identifies the wider Green Belt parcel as being important in safeguarding the countryside, the application site is replicating existing low density development which has already been established as appropriate in the Green Belt by virtue of the western Green Belt boundary. Within the 2018 study, the existing pylons are described as '<i>urban features</i>' and the western boundary as '<i>less strong</i>' when compared to the northern and southern boundaries. In addition, the report describes the '<i>grazing marshland and flat and open topography</i>' as being the important features that enable the countryside to be safeguarded within this wider Green Belt parcel. However, due to the existing electrical infrastructure, these features are not dominant at the application site.	No

Green Belt Purpose in NPPF Paragraph 143	How would National Grid's proposed development affect the remaining Green Belt	Is the purpose fundamentally undermined?
	For these reasons, the purpose of the remaining Green Belt would not be undermined by replication of the exiting, electrical infrastructure in this location.	
d) to preserve the setting and special character of historic towns;	See Table 1	Not relevant
e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	The application site has low potential for redevelopment due to its relatively small size and end of road location. The land does not consist of derelict or underused land so offers little opportunity for recycling. Finally, the application site does not align with local urban regeneration initiatives or plans, making it less important for strategic redevelopment.	Not relevant

Taking together the findings in Tables 1, 2 and 3, it is clear that the National Grid planning application site would not fundamentally undermine the purposes of the remaining Green Belt and thus the second and final qualifying matter in NPPF paragraph 155 Part (a) has also been satisfied.

The answers provided to both questions above reveal that National Grid's planning application can be considered appropriate in line with paragraph 155 in the new NPPF.

If you have any further questions regarding the above, please do not hesitate to contact me.

Yours sincerely,



Lead Consents Officer