

Rebecca Harrison
Gravesham Borough Council
Planning Department,
Civic Centre,
Gravesend,
DA12 1AU

21st November 2024

Dear Rebecca,

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

I have set out below further detail on the Biodiversity Net Gain approach for our above planning application.

Compliance with Policy CS12: Green Infrastructure

Under Policy CS12: Green Infrastructure of Gravesham Borough Council's Local Plan, it is stated that:

There will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought, in particular within the Biodiversity Opportunity Areas shown on the Strategic Green Infrastructure Network map and within new development (paragraph 5.7.24)

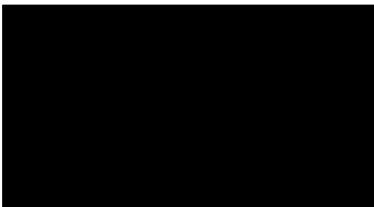
Please find enclosed an explanation of how the application has met Policy CS12 in Appendix A. Please note that this explanation was sent to the KCC Biodiversity team for comment on 20th September 2024. A response was received on 21st November confirming that sufficient ecological information has been provided.

BNG Approach

With regards to delivery of the offsite BNG parcels owned by the RSPB, we would like to confirm that National Grid is progressing legal agreements with the RSPB outside of the planning process in order to secure this commitment. The planning application was submitted on 23rd December 2023 so is not subject to mandatory BNG commitments introduced on 12th February 2024. For these reasons, we have agreed that it will not be necessary for Gravesham Borough Council to continue considering the offsite parcels of land owned by the RSPB as part of the planning application.

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

Yours sincerely,



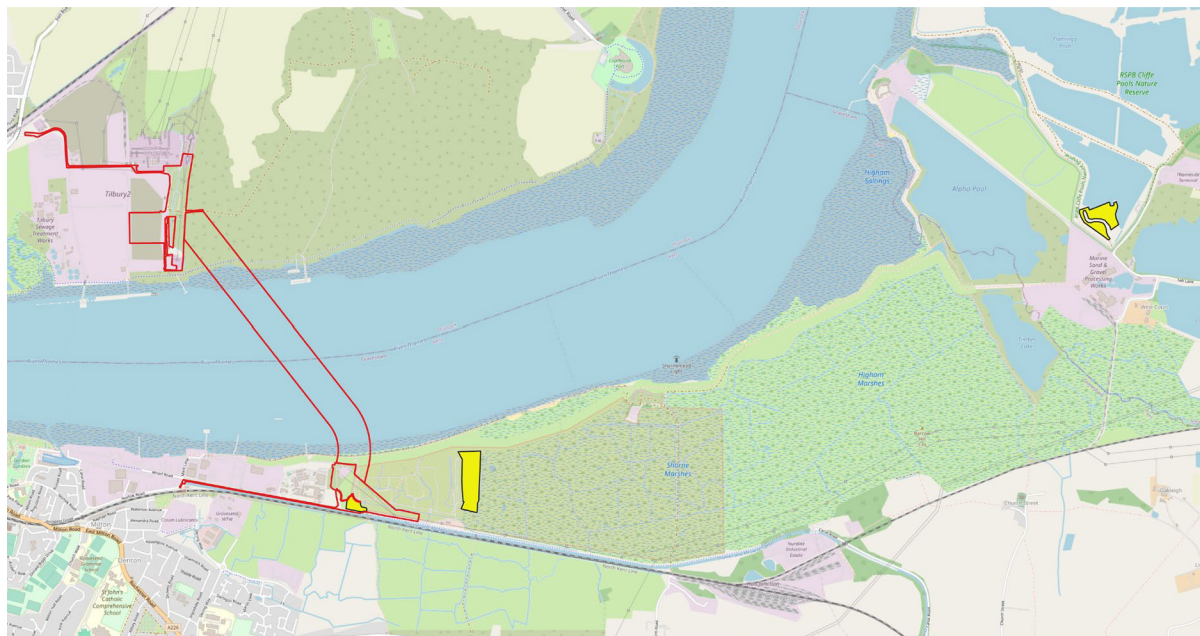
Kate McGregor
Lead Consents Officer

Appendix A

Compliance with Policy CS12

BNG Clarification

Compliance with GBC local policy for *no net loss*.



Please see borough boundaries above. The Cliffe Pools site is within Medway Council. Whereas the On site and Shorne Reedbed sites are within Gravesham Borough.

Habitats

At Shorne Reedbed:

- Areas of Moderate condition 'Wetland – Reedbeds' will be enhanced to Good condition. This delivers 48.47 Habitat Units
- There will be 7.31 Habitat units delivered from Habitat creation (there is no habitat creation at Cliffe Pools therefore we know that all habitats units within the off-site habitat creation tab are delivered by Shorne Reedbeds)
- Of the Total 122.49 Off-site Post Intervention Habitat Units delivered overall (see Headline Results Tab), we know that approximately 94 of these units come from Shorne Reedbeds following habitat loss, retention, creation and enhancement. The remaining habitat units (approximately 28) are delivered from Cliffe Pools.

We know there is a total loss of -11.33 on-site habitat units following the proposed development of the Tilbury and Gravesend sites. Therefore it is clear that with Shorne Reedbeds delivering 94 habitat units there will be an overall gain for habitats within the Gravesham Borough following this development.

Hedgerows

There are no hedgerows in the baseline of the Gravesend or Tilbury sites. There are no hedgerows proposed for creation at the Tilbury site. There is a 167m line of trees proposed for creation at Gravesend which delivers 0.35 hedgerow units. With there being no baseline on-site hedgerow units at Gravesend it is not possible to calculate a percentage change in hedgerow units however we can see that there is a gain of 0.35 units delivered from hedgerow creation at the Gravesend.

There are no hedgerows proposed for enhancement or creation at Shorne Reedbeds.

These results show that there will be a gain for habitats and hedgerows through creation and enhancement within the Gravesham Borough through the proposed development of the Gravesend Site and off-site Shorne Reedbeds.

Watercourses

From reviewing the metric Headline Results there is no proposal for creation or enhancement of on-site ditches at either Gravesend or Tilbury. The total gain in watercourse units is currently delivered through enhancement of the ditches at Cliffe Pools therefore there is currently no gain (or loss) for watercourses within the Gravesham Borough (at the Gravesend site or Shorne Reedbeds). This therefore remains compliant with Gravesham's policy for no net loss.

AECOM

20/9/24