

Date: 17th March 2025

Ref: 20250161

Site address: Britannia Refined Metals Ltd, Botany Road, Gravesend, DA11 9BG

Mrs Alison Webster

Gravesham Borough Council

By email only planning.reps@gravesham.gov.uk



Kent
Wildlife Trust

Dear Mrs Alison Webster,

RE: Application Ref. 20250161 – Request for a scoping opinion in accordance with The Town and Country Planning Act (Environmental Impact Assessment) Regulations 2017 in respect of an EIA Scoping Opinion in respect of the proposed construction of 3x wind turbines at Britannia Refined Metals Ltd, Botany Road, Gravesend, Kent.

The Britannia Refined Metals site sits adjacent to the Swanscombe Peninsula Site of Special Scientific Interest (SSSI), Botany Marshes Local Wildlife Site, and Thames Estuary Marine Conservation Zone.

The Priority Habitats which adjoin, or are in close proximity to, the site include mudflats, sandflats, low-marsh, coastal saltmarsh, reedbeds, willow carr, and coastal and floodplain grazing marsh

Considering the above designations which are either adjacent or in close proximity to the application site, it is advised that any forthcoming Environmental Statement is supported by an assessment of the impacts on local, nationally, and internationally designated sites, including the Swanscombe Peninsula SSSI. Up-to-date habitat surveys and assessments of impacts to those habitats should also be provided alongside any proposed mitigation/compensation measures. Species surveys and assessments of impacts to those species (including collision risk) should include breeding and wintering birds, invertebrates and reptiles, great crested newts, and water vole.

The Environmental Statement should also assess the impacts of noise from the construction and operation of the development on sensitive receptor sites and the species they contain. A Biodiversity Net Gain assessment, together with a copy of the completed Defra BNG Metric and supporting habitat maps, should be submitted alongside the Environmental Statement.

I hope that the detail within this letter proves to be useful in your response to the scoping opinion request. 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