

## Gravesham Borough Council response to the Pre-Submission Draft of the Kent Minerals and Waste Local Plan 2024-39.

Gravesham Borough Council does not wish to comment on the soundness or legal compliance of the Local Plan but would like to draw your attention to the following points in respect of the policy wording of Policy DM3 and the supporting text and your comments regarding mapping. In making these comments account has been taken of your response to our representations as set out in the Consultation Statement

### **Policy DM3 – Ecological Impact Assessment**

The policy wording currently doesn't appear to align with the statutory approach of ensuring the delivery of measurable biodiversity gains using the statutory Biodiversity Metric or using the Biodiversity Gain Hierarchy to ensure biodiversity gains are directed on site in the first instance. In response to our earlier comment on the point of onsite BNG delivery (see consultation statement), amended wording stating that the delivery of gains on site had been included in the Local Plan, but this wording has subsequently been taken out in the latest version and it is unclear why.

The Council accepts that the detailed approach to securing BNG could be addressed in separate guidance (paragraph 7.2.45) as appears to be the intention in the supporting text. However, the scope of the proposed guidance is unclear and there is no requirement for BNG to be delivered in accordance with the supplementary guidance (once adopted) in the policy wording and therefore the future status of this document is unknown.

### **Mapping**

In response to a previous consultation, we requested a copy of the shapefiles for any minerals and waste site safeguarding, constraints and policies. I assume this data is covered by the Public Sector Geospatial Agreement. We do not require BGS data and as such there should be no licencing issues involved in issuing this data.

In respect of the Gravesham urban area and rural inset settlement boundaries, they have not changed since the 2014 Local Plan Core Strategy Policies Map, although there are likely to be some changes going forward as the emerging Local Plan progresses. I assume that you have a shapefile showing these boundaries. If not, I would be happy to share.