


From: 
To: [Cleve Hill Solar Park](#)
Subject: Written submission from Swale Borough Council regarding net biodiversity gain and the relevance of new PPG guidance issued on 21 July 2019 for Deadline 3.
Date: 26 July 2019 09:58:38
Attachments: [image001.png](#)

Dear Sir,

Further to the Council's brief oral submissions at Issue Specific Hearing 4 relating to biodiversity and nature conservation on Thursday 25th July, I am following up our comments with some brief details on the issue of environmental net gain in light of the updated guidance in the Natural Environment section of Planning Practice Guidance released last weekend (21st July 2019).

The new guidance is relevant in its explanation around securing environmental net gain - an objective of the updated NPPF. The guidance explains that net gain is 'an umbrella term for both biodiversity net gain and wider environmental net gain' (Paragraph: 020 Reference ID: 8-020-20190721, Revision date: 21 07 2019) and that 'the aim of wider environmental net gain is to reduce pressure on and achieve overall improvements in natural capital, ecosystem services and the benefits they deliver.' (Paragraph: 028 Reference ID: 8-028-20190721, Revision date: 21 07 2019). This accords with the spirit of adopted Swale Borough Local Plan policy DM 28 (point 6) which seeks a net gain in biodiversity from development, not simply no net loss. You will appreciate that I referred to this policy as especially relevant in the context of there being no applicable NPS for solar or energy storage development.

In the Council's view the above explanation in the new guidance is useful and relevant to the Cleve Hill Solar Park NSIP examination and an assessment of whether this development will achieve overall improvements in natural capital, ecosystem services and the benefits they deliver. The ecosystem services offered by this site (particularly with managed realignment) could include carbon storage, wildlife habitat provision and flood risk mitigation. Whilst metrics for measuring Biodiversity Net Gain have been developed, the PPG explains that the metrics for assessing whether or not environmental net gain has been achieved are still in development. This obviously makes it difficult to use, but our informal discussions with Natural

England suggest that if the applicants are able to prepare some evidence on the issue of whether the Cleve Hill Solar Park offers overall environmental net gain this might allow Natural England to comment further.

By way of background to this issue, paragraph 8 of the NPPF states:

‘Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives [economic, social and environmental]):

Paragraph 118 goes onto say:

‘Planning policies and decisions should:

- a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;*
- b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;*

As an explanation of what wider environmental net gain is and how it can be achieved, the newly issued PPG advice now sets out (see Paragraph: 028 Reference ID: 8-028-20190721, Revision date: 21 07 2019):

‘The aim of wider environmental net gain is to reduce pressure on and achieve overall improvements in natural capital, ecosystem services and the benefits they deliver. For example, habitat improvements can provide a range of benefits such as improvements to soil, water and air quality, flood risk management and opportunities for recreation.

In planning strategically for the enhancement of natural capital,

planning authorities can draw upon evidence on natural capital assets, the supply and demand of ecosystem services flowing from them, and existing and future risks and opportunities for these services.

A number of metrics to measure and monitor aspects of wider environmental net gain are under development’.

The Council appreciates that this guidance is limited, but it suggests that this is a matter that merits further consideration by the applicant and the Examining Authority.

I am grateful for your acceptance of this further written representation.

Graham Thomas
Area Planning Officer
Swale Borough Council
Tel; 01795 417314



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