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27th February 2024

Dear Rebecca Harrison

RE: Proposed construction of a new cable tunnel beneath the River Thames between Gravesend and Tilbury to provide additional transmission capacity. Above-ground infrastructure in the form of a new Cable Sealing End compound and a new head house building along with associated electricity infrastructure, access, parking, boundary treatment and two overhead gantry structures for future overhead lines. Temporary compound for the duration of the project to provide parking, staff welfare facilities, delivery vehicle parking, and equipment and machinery storage, including boundary treatment and lighting. Eastcourt Marshes Electricity Distribution Site Mark Lane Gravesend Kent DA12 2HN

Buglife- The Invertebrate Conservation Trust would like to comment on the above application. Although Buglife has previously discussed the proposals with National Grid, this submission represents the first time that Buglife has been able to view substantial information regarding the application site that provides greater insights into its wildlife value.

Impacts to invertebrate assemblages within Thames Estuary South Important Invertebrate Area network

The Invertebrate Report written by Mark G Telfer (revised date, 13th November 2023) has assessed the invertebrate populations at the Gravesend site to be of county value. 307 species were recorded in just three survey visits from late July into September, indicating a diverse assemblage. Although the results would likely have been more impressive still with suitable spring and early summer surveys to capture the remaining interest on site the value of the site has been properly recognised and confirm that the site is in good condition for invertebrates.

The site is adjacent to the current mapped area of the Thames Estuary South Important Invertebrate Area (IIA), a network of sites that provide nationally or internationally significant places for the conservation of invertebrates and the habitats upon which they rely.¹ With new invertebrate data available as a result of this application, the Gravesend site will now be incorporated into the Thames Estuary South IIA, recognising the important habitat it provides in the wider landscape, including being functionally linked to the South Thames Estuary and Marshes Site of Special Scientific Interest (SSSI). The site also falls entirely

¹ [Important Invertebrate Areas - Buglife](#)

within the Canal and Grazing Marsh, Highnam Local Wildlife Site (LWS) designated for its Coastal Floodplain Grazing Marsh Priority Habitat.

The construction phase will result in the permanent loss of just under 0.96 ha of Coastal Floodplain Grazing Marsh, with approximately 4.5 ha subject to temporary impacts for up to four years. All the site ditches will be retained along with a '*minimum buffer of 5m*'. As this is the only habitat to be retained on site, Buglife would hope to see this buffer increased and ideally a phased approach to loss or modification of habitats rather than the whole area being cleared within a short time frame. It would also like to see a clear commitment to reinstating habitats as soon as possible after their initial disturbance.

Landscape proposals

Overall, the Outline Landscape and Ecological Management Plan (OLEMP) written by AECOM (dated December 2023) details proposals that in the long-term will replace much of the habitat lost, however, every effort must be taken to provide suitable habitats and features for the current invertebrate interest of the site. Buglife provides some additional recommendations below.

Wetland Features

New wetland features are to be created on the site that will link in with the existing ditch network. Buglife is unclear why the ditch network was not surveyed as part of the invertebrate assessment, and it would be recommended for a survey to be undertaken before works commence to help inform new ditch and reedbed creation to maximise their value for invertebrates.

Restoring Habitats

The OLEMP states that "*Where practicable, seed will be obtained from a local source for the purpose of maintaining continuity with local coastal and floodplain grazing marsh*", however, the document also suggests the use of commercial seed mixes. Buglife would like to highlight that sowing commercial seed mixes near a SSSI is not best practice. The document 'Creating habitat for pollinators in Britain & Ireland'² sets out best practice guidance which should be followed to avoid impacts on South Thames Estuary Marshes SSSI.

Brown Roof creation

A brown roof is proposed and when constructed to a high standard, they can provide habitat of high ecological value to invertebrates. Buglife is pleased to see that only locally sourced seed and natural regeneration will be used to establish vegetation. Buglife has created a detailed guidance document '*Creating Green Roofs for Invertebrates*'³ which provides some general principles on how to create biodiverse roofs.

Hornet Robberfly

Hornet Robberfly (*Asilus crabroniformis*) is a Priority Species under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 found on the site. Of this species, the Invertebrate Report states "*preferring sites with high abundance and diversity of dung beetle prey associated with horse dung*". Horse grazing is the desired management for the southern fields. Buglife would like to highlight that the dosing of livestock with broad-spectrum de-wormers is damaging to insect development and alternative treatments

² [Restoring, enhancing and creating habitat for pollinators in Britain & Ireland \(cieem.net\)](https://cieem.net/restoring-enhancing-and-creating-habitat-for-pollinators-in-britain-ireland)

³ [Creating Green Roofs for Invertebrates Best-practice-guidance.pdf \(buglife.org.uk\)](https://buglife.org.uk/creating-green-roofs-for-invertebrates)

should be used wherever possible. Dosing the livestock off-site and keeping them off such land of conservation value for at least 10 days after treatment will reduce the impact of worming treatments on the invertebrate dung fauna.

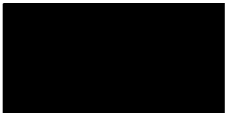
De-commissioned infrastructure

The OLEMP does not detail proposals for the current infrastructure on the site when it is de-commissioned at the end of the project. Details should be provided in the full LEMP, with opportunities taken to create habitats that will restore similar grazing marsh conditions to those currently found on site that support its diverse assemblage of invertebrates.

Buglife would urge these recommendations presented here to be taken forward into the more detailed LEMP and Construction Environmental Management Plans to help reduce the impacts from the proposals on invertebrates and provide the best opportunities in the future to maintain the sites invertebrate interest.

Please do get in contact if you require any further information.

Yours sincerely



Jamie Robins

Programmes Manager