

Delegated Report

Discharge of Conditions

Planning Application No: 20250755

Location: Eastcourt Marshes Electricity Substation Mark Lane Gravesend Kent

Description: Application for the approval of condition 11 a,b,c,d (Landscape Ecological Management Plan (LEMP)) attached to planning reference number 20231313.

Applicant: National Grid Electricity Transmission PLC

Submitted Documents/Plans

- Application form;
- Covering Letter;
- Landscape and Ecological Management Plan (LEMP) - Rev P5;
- Response to KCC Biodiversity (24th September 2025);
- Response to KCC Biodiversity (6th October 2025); and
- Response to KCC Biodiversity (9th October 2025).

Superseded Documents

- ~~Landscape and Ecological Management Plan (LEMP) (contains appendix 1 & 2).~~
- ~~LEMP Appendix 3 – Construction Ecological Management Strategy and Ecological Design Strategy.~~

Relevant Planning History

20231313 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.

Permitted 04.03.2025

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS12 – Green Infrastructure
- CS19 – Development & Design Principles

Paragraph 34 of the NPPF (2024) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and

Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving Sustainable Development
- Section 12 – Achieving Well-Designed Places
- Section 15 – Conserving and enhancing the natural environment

Consultations, Publicity and Representations

Consultees

Environment Agency

No objection

North Kent Marshes Internal Drainage Board

The site is within the North Kent Marshes Internal Drainage Board's district; however, this application relates to the Construction Ecological Management Strategy, and as such, the Board has no comment.

This response has been provided using the best knowledge and information submitted as part of the planning application at the time of responding and is reliant on the accuracy of that information.

Natural England

Natural England is not able to provide specific advice on this application and therefore has no comment to make on its details

Extensive comments have been received from KCC Biodiversity which are available to view on public access <https://plan.gravesham.gov.uk/online-applications/>

KCC Biodiversity (20th October 2025)

Sufficient information/clarification has been provided and no further information is required.

KCC Biodiversity (2nd October 2025)

Additional information required

KCC Biodiversity (4th September 2025)

The submitted document is well structured and fairly comprehensive. However, there are a few updates that we consider necessary to ensure that the document is fully accurate and achievable.

Officer's Analysis

Condition 11

11. *Ecological Management Plan (LEMP), including long-term design objectives, management responsibilities and maintenance schedules for all wetland and ditch habitats has been submitted to, and approved in writing by, the Local Planning Authority.*

The LEMP shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

The LEMP shall include the following:

- a. Details of treatment of operational site boundaries and/or buffers around water bodies; an adequate buffer zone extent (i.e. to provide good forage and shelter for water voles) to be identified and demarked on a scaled map;*
- b. Details demonstrating how the buffer zone will be protected during development;*
- c. Details of how any permanent proposed footpaths, fencing, lighting, and other aspects of the development may interact with the wetland or ditch habitats; the applicant should note that artificial light spill should be directed away from ecological receptors, sensitive lighting design guidance can be accessed via the Bat Conservation Trust;*
- d. No light spill from permanent external artificial lighting into the watercourse or adjacent river corridor habitat. To achieve this the specifications, location and direction of external artificial lights should be such that the lighting levels within 8.5 metres of the top of bank of the watercourse are maintained at background level (background levels are considered to be a Lux level of 0-2);*
- e. Details of maintenance regimes; including specific treatment of the ditch buffer zone and new wetland habitats;*
- f. Details of any new wetland and ditch habitat created on-site, including any proposed planting scheme should be provided. Planting schemes should use native species, suited to the catchment character and management responsibilities should be provided.*

This is the application for the approval of condition 11, parts a,b,c,d only (Landscape Ecological Management Plan (LEMP)) attached to planning reference number 20231313.

- Application form;
- Covering Letter;
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KCC Biodiversity (4th September 2025) stated that more information was required around the following elements.

- Construction phase information
- Operational phase information prior to first use of the project.
- Reptiles
- Invertebrates

Discussions took place with KCC Bio who revised additional information from the agent and on 2nd October 2025 raised the following outstanding issues.

- *Reptile surveys in line with current professional standards at the proposed receptor site that has existing suitability for reptiles;*
- *Clear consideration of which habitats reptiles will be able to move into if solely relying on using habitat manipulation, and an acceptance that in some areas, a more targeted trapping effort may be preferable;*
- *Commitment to ensuring that the 'enhancement areas' have been suitably enhanced prior to carrying out site/vegetation clearance activities, and that management of the 'enhancement areas' will commence as soon as they are ready and expected to receive displaced animals;*
- *Further confirmation that for key invertebrate species of conservation concern, that habitat will be continuously available in sufficient quantity on or sufficiently near the site to permit recolonisation of the site post-development;*

- *Full understanding of the habitat management requirements of fiery clearwing moth to ensure that the size of the reptile enhancement area is not effectively reduced by using the site for both fiery clearwing moth conservation and for reptiles.*

It was noted that during a site visit during September 2025 that site clearance had commenced and this was confirmed by Google Earth photos as shown below.

March 2025



August 2025



The applicant’s letter of 9th October 2025 set out a timeline of events that had occurred on site to assist KCC Biodiversity in understanding if the works that had commenced had an impact on biodiversity on site.

The key outcomes

September 2025	
Ecological supervision during vegetation clearance.	We can confirm that key ecological surveys were completed ahead of any site clearance, helping ensure that appropriate control measures were in place from the outset. Arboriculture, badger, and reptile surveys were all undertaken in advance of works, in line with best practice. Full details of the surveys undertaken, together with their timing is provided within the submitted documentation. Whilst the buffer zones alongside site watercourses have been demarcated, nonetheless the water vole surveys were also initiated prior to clearance.

The projects' badger survey confirmed that the species is absent from the site. The reptile survey identified the species present and has provided evidence to supporting the proposals present within the reptile mitigation strategy and detailed precautionary method of works document. Water vole surveys re-confirmed the requirement for a 5m buffer, which is also helping to inform our understanding of potential future impacts on the site's ditches.

These surveys have provided a solid ecological baseline and have helped guide our approach moving forward.

The vegetation clearance activity to facilitate the pre-construction activity was carried out under the supervision of a qualified Ecologist, in full accordance with the methodology outlined in the Precautionary Method of Work document. This best practice approach was designed to respond to the findings of the reptile surveys, which recorded a peak count of 10 slow worms, 2 common lizards, and 1 grass snake.

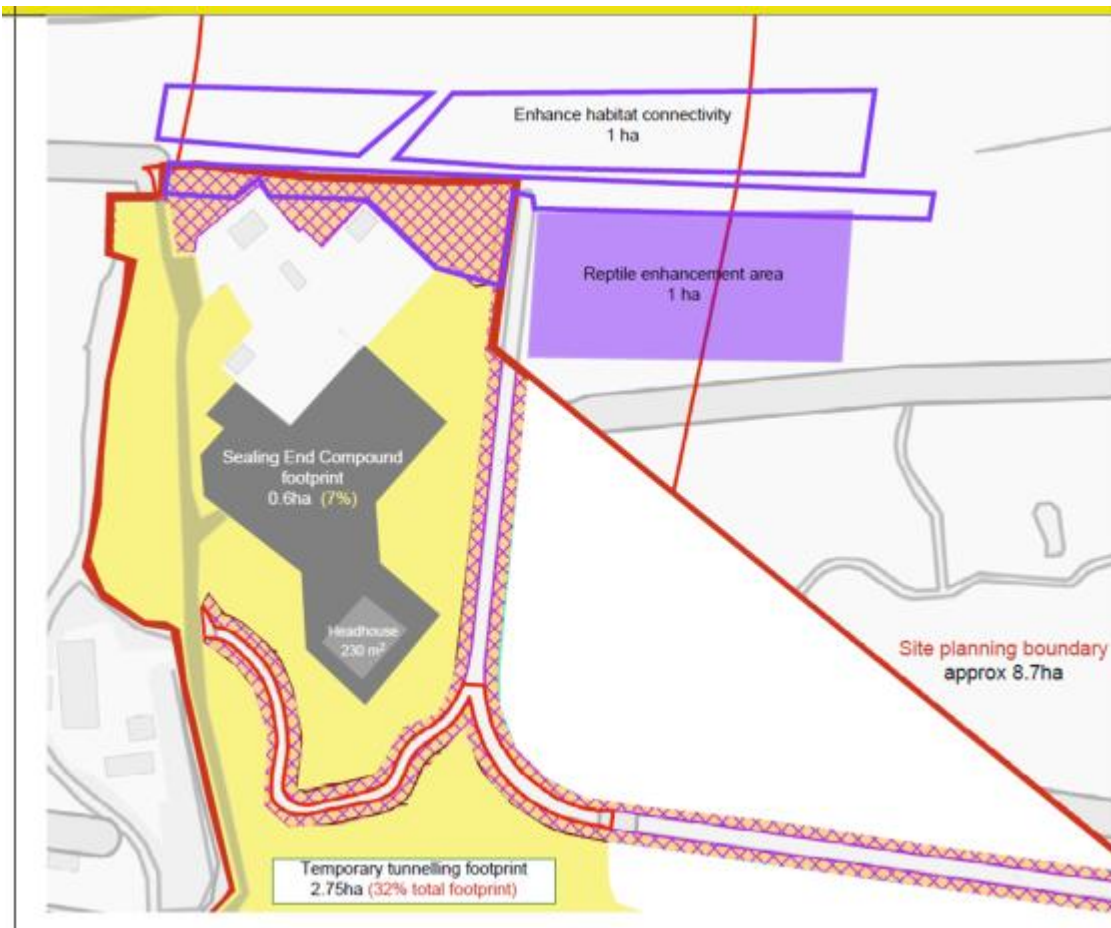
A two-stage clearance method was followed, working progressively towards designated buffer areas. Vegetation was initially cut to a height of over 100mm, with arisings removed, and the area thoroughly searched by an ecologist to support and encourage reptile dispersal. The area was then left undisturbed for 24 hours, followed by a detailed fingertip search prior to final clearance.

Where necessary, suitable reptile habitat was carefully cleared, with any reptiles directed into the buffer zones. As part of this process, 1 slow worm and 1 common lizard were relocated to the east of the site.

Given the paucity of reptiles encountered on the site during the pre-clearance surveys, and the clearance works themselves, the project is comfortable that the areas immediately surrounding the site provided extensive suitable habitat to accommodate the low numbers of displaced individuals.

An Ecological Clerk of Works (ECoW) was present throughout, with duties including ensuring the water vole buffer was maintained adjacent to the sites drainage ditches, and that nesting birds were protected.

The applicant also confirmed the status of land adjacent to the working area, earmarked for ecological Enhancement which confirmed the following;



The applicant also confirmed the following:

The documentation submitted (Landscape and Ecological Management Plan (LEMP) - Rev P5) represents the appropriate mitigation and control measures, both those that have already been adhered in line with best practice for clearance associated with pre-development activities, as well as to:

- *Control future vegetation clearance required for the project.*
- *Offset the long term/permanent footprint of the completed works As described, one (to the north of the site) of the two areas of committed offsite habitat enhancement has been implemented prior to the initial pre development vegetation clearance, with the other (to the east of the site) due to be implemented at the start of development, and prior to the further site vegetation clearance. As described within the submitted documentation*

The remainder of the outstanding issues that KCC Biodiversity have raised will be addressed through the future discharge of Condition 11 E and F.

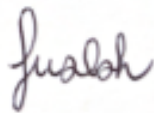
It is considered that sufficient information has been submitted to discharge condition 11 a,b,c,d and there is no conflict with Policy CS12 (Green Infrastructure) and Section 15 of the NPPF (2024).

Recommendation

Discharge Condition 11 a,b,c,d

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Mr Richard Hart	Team Leader:	Mrs Faye Walsh
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Signed:	<i>R Hart</i>	Signed:	
Dated:	22 nd October 2025	Dated:	24 October 2025