

Richard Hart  
Planning Department  
Gravesham Borough Council  
Civic Centre  
Gravesend  
Kent DA12 1AU

24<sup>th</sup> September 2025

Dear Richard,

**National Grid Planning Application ref 20231313**

We write as the Ferrovial Bemo Joint Venture (FBJV) – the contractors appointed to undertake the construction of the Tilbury Cable Tunnel. Thank you for sharing with us the letter you recently received from the Kent County Council Ecological Advice Service (KCC EAS) regarding our Landscape and Ecological Management Plan (and associated appendices) submission intended to discharge planning conditions 10, 11 and 12 of our planning application above.

In response, we would like to clarify some of the points KCC EAS raised and have provided further details in the table below. Whilst the clarifications requested are generally provided solely within this table, we have nonetheless updated the LEMP document as indicated within our response to the second comment – with the revised document (P05) provided alongside this letter. Please note that, for ease of review, updates to the documentation have been made as tracked changes.

| KCC EAS Comment Topic or Reference | KCC EAS Comment Detail                                                                                                                   | Project Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| Water Voles                        | Where or how the habitat enhancement/creation required under licence will be available after completion of works needs to be made clear. | <p>It is identified that the project will be seeking the appropriate protected species licences to cover its likely interaction with Water Vole habitat, and as such we note that the terms of these licences will specify detailed mitigation methodologies to be adhered to - and therefore subject to regulatory control outside of the Town and Country Planning regime.</p> <p>It is further identified that details of any operational habitat enhancements, including those for water voles, will be detailed in the second stage submissions to be made to the Local Planning Authority in due course to cover the site reinstatement, landscaping, and long-term ecological enhancements/mitigation – covering the associated elements of conditions 10, 11 and 12</p> |

| KCC EAS Comment Topic or Reference | KCC EAS Comment Detail                                                                                                                                                                                                                                                                                              | Project Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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|                                    |                                                                                                                                                                                                                                                                                                                     | <p>After consulting with our appointed ecologists, and subject to any additional/contradictory Licence requirements, we commit to the following enhancements for the benefit of Water Voles, including:</p> <ul style="list-style-type: none"> <li>• Improving suitability of the embankment by planting of suitable macrophytes and water vole food plants</li> <li>• Reduce shading from overhanging scrub and trees to encourage natural growth of macrophytes.</li> <li>• Additional planting of marginal aquatic vegetation which will support water vole by providing additional food plants and provide shelter and cover.</li> <li>• Improvement of drainage to allow free flow of water across WB5 on the site, ensuring no obstruction to channel and flow.</li> <li>• Post construction monitoring for water vole and European mink with any additional management recommendations put in place following monitoring.</li> </ul> |
| Updated Surveys                    | <p>Update CEMS to include latest survey results including survey dates and weather conditions.</p> <p>It is not clear that a survey of the compensation site with suitable reptile habitat has been undertaken to understand the current population present and how the habitat can support additional animals.</p> | <p>We have updated the LEMP to include this information (Section 4.5) and carried out updates to Figure 1 and Table 4 of LEMP Appendix C.</p> <p>At the planning application stage, it was identified and reported that the proposed compensation site would be suitable for its intended use. An additional suitable habitat assessment is planned to be undertaken during late September 2025 in order to fine tune the project proposals and ensure that maximum benefit can be obtained from the use of the enhancement area.</p>                                                                                                                                                                                                                                                                                                                                                                                                       |
| Invertebrates                      | <p>Make clear whether construction activities are expected to impact upon the important habitats for invertebrates or exactly which species/habitats are likely to be affected. This is required so KCC can determine if any specific</p>                                                                           | <p>A monitoring visit was carried out by a leading invertebrate specialist in July 2025.</p> <p>The overall assessment based on the results of the July monitoring visit suggests a site of low quality for invertebrates. It is nevertheless a site that supports some individual species of conservation importance, including Fiery Clearwing, Brown-banded Carder-bee, and a few other scarce species.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

| KCC EAS Comment Topic or Reference          | KCC EAS Comment Detail                                                                                                                                                                                                                                                                                                                                                                                 | Project Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |      |              |                                             |          |
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|                                             | <p>mitigation required prior to construction.</p> <p>Require information on how BugLife comments at determination stage have been considered.</p>                                                                                                                                                                                                                                                      | <p>The development is expected to cause temporary impacts across the entire site – consistent with the residual effects reported within the project ES, except for an area of 230 m², which will be permanently lost due to the location of new permanent infrastructure.</p> <p>Aside from any specific mitigation that may be required for impacts on the recently discovered presence of Fiery Clearwing Moth (FCM), the adopted 5m buffer around watercourses, originally recommended by Buglife, and subsequently committed to by the project remains considered sufficient during the construction period.</p> <p>It is noted that the majority of comments received from Buglife during the progression of the planning application are associated with the permanent landscape site restoration. Accordingly, these will be dealt with within the second stage LEMP submission, to be provided to Gravesham for approval in due course. The main Buglife comment relevant to the construction period, relates to the retention of the 5m buffer zones, alongside the existing watercourses on site. We can confirm that such buffers will be retained, and indeed, where practicable, the size of these buffer zones will be further increased beyond 5m. Furthermore, Buglife recommended areas that are subject to vegetation clearance are reinstated as soon as practicable; and that any future vegetation clearance undertaken to facilitate the project is completed in a phased manner – we commit to adhering to these suggestions.</p> |      |              |                                             |          |
| Reptiles                                    | <p>Need to make clear from the submitted information how much reptile habitat is anticipated to be permanently or temporarily lost.</p> <p>Query regarding suitability of reptile mitigation strategy given habitat, species and reference to potential fencing/translocation.</p> <p>Require information on the precise mowing regime in the enhancement areas.</p> <p>Reference to best practise</p> | <p>Consistent with the scheme that gained approval through the planning permission process, a total of 0.6ha (7%) of habitat within the temporary footprint will be permanently lost as a result of the permanent works around the Sealing End Compound (SEC). The construction site footprint For works to deliver the tunnel and SEC encompasses 2.75 ha, representing 32% of the entire site planning boundary (around 8.7 ha).</p> <table><tr><th>Area</th><th>Loss / Gains</th></tr><tr><td>Temporary tunnelling construction footprint</td><td>-2.75 ha</td></tr></table>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Area | Loss / Gains | Temporary tunnelling construction footprint | -2.75 ha |
| Area                                        | Loss / Gains                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |      |              |                                             |          |
| Temporary tunnelling construction footprint | -2.75 ha                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |      |              |                                             |          |

| KCC EAS Comment Topic or Reference | KCC EAS Comment Detail                  | Project Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |          |
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|                                    | in Reptile Habitat Management Handbook. | Permanent infrastructure footprint                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | -0.60 ha |
|                                    |                                         | Enhancement and enhanced connectivity areas                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | +2 ha    |
|                                    |                                         | <p>Please refer to the drawing appended to this letter for an illustration of the land areas under discussion.</p> <p>Details associated with the suitability of reptile and FCM habitat creation during the temporary work for the tunnelling construction are provided in Section 3.4 of the Reptile Mitigation Strategy, and additionally referred to in Section 14.3 of the LEMP Appendix C.</p> <p>Whilst this submission seeks agreement that the proposed construction phase reptile mitigation is adequate to control potential impacts during the temporary phase, any details associated with the suitability of permanent habitat creation as part of site reinstatement works (in order to offset the permanent habitat interactions of the project) will be covered within the second stage LEMP submission.</p> <p>We have updated the Ecological Opportunities and Constraints Report in order to withdraw the proposals regarding reptile fencing – following the interpretation of further recent assessment work and the suitability of some of the originally proposed options in previous versions of this document.</p> <p>Insofar as it does not prevent the adoption of appropriate mitigation measures associated with the FCM, the project can commit to adhering to best practice commitments outlined within the Reptile Habitat Management Handbook.</p> <p>Further, in relation to reptile mitigation, and in adherence to the recommendation of Natural England – we will adopt a two staged cutting approach for areas to be cleared of vegetation in order to make habitat temporarily unsuitable during the active season. This is an accepted displacement technique for reptiles and can avoid or reduce the need for licenced translocation except where species/licencing advice indicate otherwise.<br/> <a href="https://www.gov.uk/guidance/reptiles-advice-for-making-planningdecisions">https://www.gov.uk/guidance/reptiles-advice-for-making-planningdecisions</a>)</p> |          |

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| Operational Phase                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Advice and recommendations pertinent to the stage 2 submission against the relevant ecological conditions is welcomed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Construction Phase (condition 11)  | <p>We would recommend that any habitat restoration, creation or enhancement elements of the project (including required management actions) that are required for protected/priority species mitigation such as for invertebrates, reptiles and water voles are provided at this stage. The reason being that these works should happen prior to or as part of site/vegetation clearance. Currently the information provided appears insufficient.</p> <p>Habitat creation works that are purely proposed as enhancements or not required for short-term species mitigation would be ok to be left as information prior to first use of the project as proposed.</p> | <p>This matter will be addressed within the second stage of the LEMP submission – to be submitted in due course to Gravesham for approval, in consultation with KCC.</p> <p>The principle of the development, and the clearance necessary to deliver it is already approved by the overall planning permission. Details associated with site restoration and long term ecological management during the operational phase of the project are for approval prior to the completion of construction, providing appropriate time for detailed design development and iterative engagement alongside project stakeholders.</p> <p>Details associated with habitat creation during the construction phase, for example, hibernacula, are included within the submission made.</p> <p>The Reptile Strategy Report is provided as part of the revised LEMP Appendix C, including details on the enhancement area improvements.</p> |
| Long term monitoring               | <p>The monitoring measures that will be required long-term and the responsibility for long-term management of the protected/priority species mitigation areas should be made clear at this stage as these measures will need to be in place prior to or in line with site/vegetation clearance activities.</p>                                                                                                                                                                                                                                                                                                                                                       | <p>This matter will be addressed within the second stage of the LEMP submission – to be submitted in due course to Gravesham for approval, in consultation with KCC.</p> <p>The principle of the development, and the clearance necessary to deliver it is already approved by the overall planning permission. Details associated with site restoration and long-term ecological management during the operational phase of the project are for approval prior to the completion of construction, providing appropriate time for detailed design development and iterative engagement alongside project stakeholders.</p>                                                                                                                                                                                                                                                                                                  |

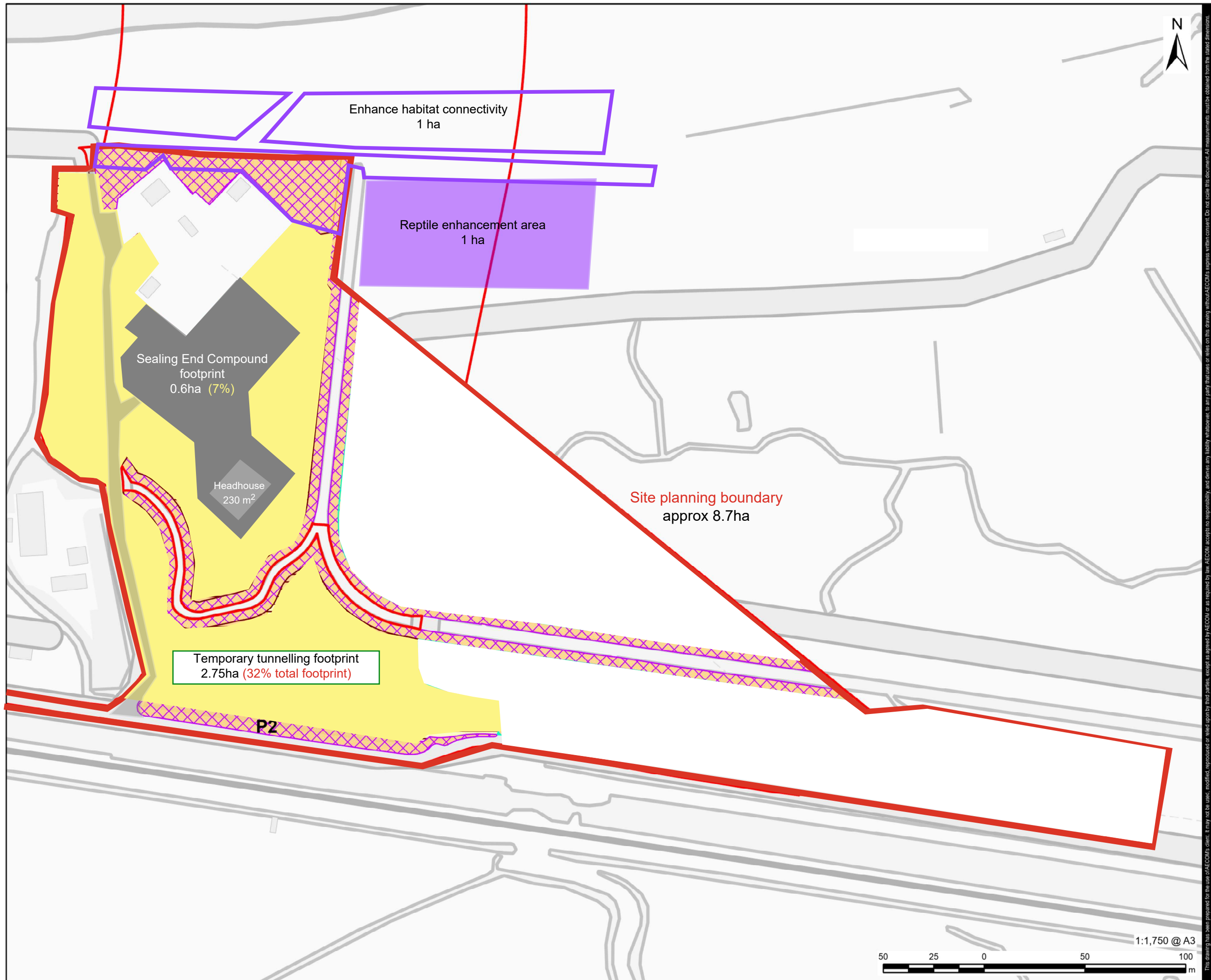
If you have any further questions regarding the above, please do not hesitate to contact me (nwarans@fbjvgraintotilbury.co.uk).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Nick Warans', with a long, sweeping underline.

**Nick Warans**  
**FBJV Consents Manager**

*Attachment: Sketch identifying relative site habitat creation areas*



- LEGEND**
- Red Line Boundary
  - Temporary tunnelling footprint
  - Sealing End compound (SEC) footprint
  - Reptile Enhancement Area
  - Buffer (minimum width 5m)
  - Enhance habitat connectivity

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