

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

9th October 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 on behalf of National Grid. Thank you for your time to meet yesterday (08/10/25) where we were able to provide further clarity regarding our submissions to discharge conditions 10, 11 and 12 of our planning application above – with reference to advice provided to the Council from Kent County Council Ecological Advice Service (KCC EAS).

We are encouraged by the progress being made, and the relatively few remaining residual areas of concern expressed by KCC EAS. Coming from the meeting held on 08/10/25, there were several further areas where the project was asked to provide clarification, as set out below:

Topic	Project Response
Timeline of pre-commencement activities undertaken, including vegetation clearance to facilitate	As discussed in the meeting, there have been a number of pre-commencement activities performed at the site in preparation for development starting. These comprise: • Pre clearance Ecological and Arboricultural surveys (February-May 2025) • Geotechnical Surveys/Ground Investigations/installation of monitoring equipment (May – October 2025) • Erection of site perimeter security fencing (Late June - August 2025) Activities to facilitate the above pre-commencement activities: • Vegetation clearance (late May – Mid June 2025) <i>(with the exception of the area designated for the protection of the Fiery Clearwing Moth, to the north east of the site area)</i> • Receipt/erection of temporary site welfare + generator – (August-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.

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	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.
Status of land adjacent to the working area, earmarked for ecological enhancement	Interest was expressed during the meeting as to the status of the third party owned land immediately to the north of the existing National Grid Substation which has been earmarked for offsite habitat enhancement for the benefit of reptiles (as indicated below 'enhanced habitat connectivity'). Discussions were held with the landowner (Environment Agency) at the end of 2024, with it concluded that a relaxed mowing scheme would be implemented by the landowner with immediate effect – thus it can be confirmed that this area had undergone its habitat enhancement prior to the above described vegetation clearance.

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Reptile displacement from the area currently demarcated for the protection of Fiery Clearwing Moth (FCM)	The project confirmed during the meeting that a Protected Species Licence is to be sought prior to translocating Dock Plants, relied upon by the protected FCM to the Reptile enhancement area to the east of the site. Interest was expressed during the meeting in relation to the interface between the timing of the protected species licence – in that should receipt be delayed, it would be disadvantageous to undertake clearance of the FCM area during the winter months due to the risk of disturbing hibernating reptiles. The project confirms that it is not the intent for the currently demarcated area within which the FCM were identified to be cleared until spring 2026.
Validity of project documentation submitted pursuant to the discharge planning conditions 10, 11 and 12.	The documentation submitted 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,

Topic	Project Response
	these areas of offsite habitat enhancement are considered to provide suitable provision to offset both the temporary and permanent footprints of the works.

We trust that the clarifications provided above facilitate the discharge of conditions 10, 11 and 12 of the planning permission. Following the completion of the pre-commencement activities the site remains dormant until the relevant pre-commencement conditions are discharged. The project remains committed to ensuring that best practice approaches are adhered to – as outlined within the submitted documentation, and within subsequent clarifications provided to the Planning Authority and your advisors, KCC.

Yours sincerely,



Nick Warans

FBJV Consents Manager