

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

6th October 2025

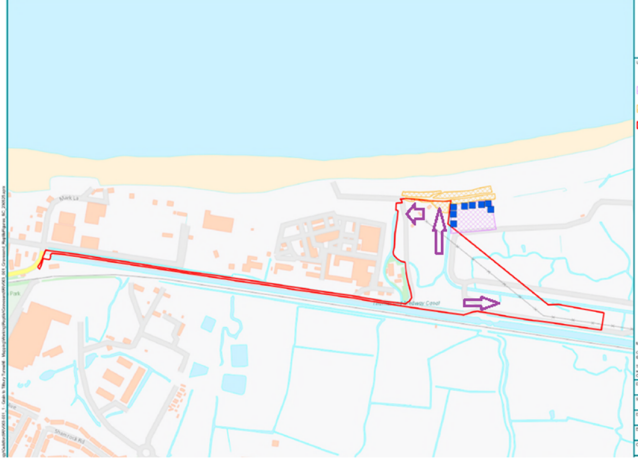
Dear Richard,

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. Thank you for sharing with us the letter you recently received from the Kent County Council Ecological Advice Service (KCC EAS) dated 02/10/25 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 – which itself was a response to our previous clarifications provided within our letter dated 24/09/25.

For ease, we have summarised the key points made by KCC EAS most recently within the table below, together with clarifications provided against each.

KCC EAS Comment Topic or Reference	Project Response
Reptile surveys on proposed receptor site	An updated habitat suitability assessment survey was conducted on 2nd October, the results concluded the site has moderate suitability for reptiles. This area is highlighted for enhancement in October, including installation of x8 hibernacula log piles, as per the drawing in the Reptile Mitigation Strategy (Thomson, 2025). The recent HSA data is aligned with AECOM's previous assessment which indicated that these areas are of moderate quality for reptile foraging. However, their overall value for reptiles is limited by the uniformity of the habitat (predominantly long sward grassland), the lack of structural diversity (e.g., absence of open areas suitable for basking), and a scarcity of suitable refugia that provide cover or resting places. These issues will be addressed during the October enhancements to improve the current carrying capacity of the enhancement area.
Clear consideration of which habitats reptiles will be able to move into	We believe there are suitable displacement opportunities to the east, within the 5m buffer around waterbodies, and in a small area to the west. All clearance will be supervised by an ecologist and, if required, individuals will be relocated to the enhancement area. Purple arrows added to the figure (below) to indicate available routing reptile dispersal areas.

KCC EAS Comment Topic or Reference	Project Response
	 Thomson environmental consultants Map Details and Reference: BPC/14/17/0000 Scale: 1:5,000 Project: KCC Date: 22/09/2025 Prepared by: AS Reviewed by: Jore Ventura
Commitment to ensuring that the 'enhancement areas' have been suitably enhanced prior to carrying out site/vegetation removal	We apologise if the data presented in the LEMP was misleading - the enhancement works will take place ahead of Spring 2026, and not at the completion of the construction works. Refugia will be installed in October 2025, followed by vegetation cutting before February 2026. An updated Habitat Suitability Assessment (HSA) will be carried out to verify that no further enhancements are required in Spring 2026. Improved connectivity will provide suitable corridors following the reinstatement of the site. We believe there is sufficient capacity within the enhanced reptile area and the surrounding buffer. Additionally, these are not closed sites —the enhancement area is open to a much wider expanse of suitable habitat to the east.
Further confirmation that for key invertebrate species of conservation concern	An impact assessment was conducted as part of the 2023 Environmental Statement to determine impacts on invertebrates, and it was deemed not significant. We have implemented the recommended mitigation of a 5m buffer and as a result of the FCM discovery and will be taking appropriate avoidance, licencing and mitigation if this species is to be impacted. According to the 2025 update invertebrate surveys; <i>"the overall assessment based on the results of the July monitoring visit suggests a site of low quality for invertebrates, it is clear that 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."</i> (Telfer, 2025). The site is not considered of greater significance (indeed, lesser significance) than identified in the previous surveys, so additional measures are considered disproportionate.
Full understanding of the habitat management requirements of fiery clearwing moth	FCM and reptiles are able to co-exist on site and within the enhancement area. Should translocation be required for the FCM, the method statement as part of the license application will detail management and retention of doc plants within the enhancement area. Such details will be discussed and agreed with Natural England.

We note that we have a meeting planned for 08/10/25 with both Gravesham Borough Council and KCC EAS, and look forward to discussing the above clarifications during that meeting – and indeed responding to any queries which may be raised at that time - in order to expediently reach a conclusion on this matter.

Yours sincerely,

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

Nick Warans
FBJV Consents Manager