

**Vattenfall Wind Power Ltd**  
**Thanet Extension Offshore Wind Farm**

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Thanet Extension Offshore Wind Farm  
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## 7 ONSHORE HISTORIC ENVIRONMENT

### 7.1 Introduction

7.1.1 This chapter of the Environmental Statement (ES) assesses the likely significant effects of Thanet Extension with respect to the onshore historic environment. The chapter should be read in conjunction with:

- Volume 2, Chapter 1: Offshore Project Description (Document Ref: 6.2.1)
- Volume 3, Chapter 1: Onshore Project Description (Document Ref: 6.3.1);
- Volume 5, Annex 7-1: Desk Based Assessment (Document Ref: 6.5.7.1);
- Volume 5, Annex 7-2: Criteria for Selection of Onshore Heritage Assets to be Assessed (Document Ref: 6.5.7.2); and
- Volume 5, Annex 7-3: Scope of assessment of effects arising through change to setting of onshore heritage assets (Document Ref: 6.5.7.3).

7.1.2 The historic environment is defined, following the Overarching National Policy Statement for Energy (DECC 2011), as at paragraph 5.8.2: "All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora."

7.1.3 Following a summary of relevant policy and legislation, this chapter describes the baseline data gathering methodology and the overall baseline conditions. An assessment of the potentially significant effects of the development is then presented. Proposals for further investigation to support assessments of effect or design of mitigation proposals have also been set out. The chapter concludes with a summary of residual effects and an evaluation of their significance.

7.1.4 Some of the issues discussed in this chapter will cross-cut with discussion in other chapters. While the assessment presented here relates to the terrestrial historic environment as defined by statute, policy and regulatory definition, it may be useful to make reference to other chapters, most notably the Landscape and Visual Impact Assessment (Volume 3, Chapter 2: Landscape and Visual Impact Assessment (Document Ref: 6.3.2), Marine and Coastal Archaeology and Historic Seascape Characterisation (HSC) (Volume 2, Chapter 13: Marine and Coastal Archaeology and HSC (Document Ref: 6.2.13)) and the Seascape, Landscape and Visual Impact Assessment (Chapter 12: Seascape, Landscape and Visual Impact Assessment (Document Ref: 6.2.12)). Specific cross-references are included within the text.

7.1.5 The following sections of this chapter include:

- A summary of relevant legislation and planning policy;
- A description of the methodology for the assessment, including details of the study area and the approach to the assessment of effects;
- A summary of consultation with stakeholders;
- A review of baseline (existing) conditions;
- Details of the measures proposed as part of the project to avoid or reduce environmental effects, including mitigation and design measures that form part of the project (embedded mitigation);
- An assessment of the likely effects for the construction, Operation and Maintenance (O&M), and decommissioning phases of the project, taking into account the measures proposed;
- Identification of any further mitigation measures or monitoring required in relation to likely significant effects;
- A summary of any residual effects and an analysis of their significance; and
- Assessment of any cumulative effects with other proposed developments.

### 7.2 Statutory and policy context

7.2.1 It is necessary to consider the national and local planning policy context in order to set an appropriate scope for the EIA and to be able to understand the acceptability of the scheme in policy terms. The importance of the historic environment is recognised in legislation and heritage assets that are deemed to be of particular importance are given legal protection. Relevant policy and statutory considerations in this proposal are set out at Table 7.1.

7.2.2 NPS EN-1 sets out that a heritage asset is an element of the historic environment which has sufficient archaeological, historic or artistic/ architectural interest to be considered within the planning process (DECC 2011). The sum of the heritage interests of a heritage asset is referred to as its significance. This concept is entirely distinct from the assessment of significance of effects in EIA terms. Consequently, where necessary to avoid confusion, this is referred to below as 'heritage significance'.

**Table 7.1: Legislation and policy context**

Policy/legislation	Key provisions	Section where provision addressed
The Infrastructure Planning (Decisions) Regulations 2010	<p>Require decision-makers to have regard for the desirability of preserving:</p> <ul style="list-style-type: none"> <li>Listed buildings, any features which contribute to their special interest and their settings;</li> <li>Scheduled monuments and their settings; and</li> <li>The character and appearance of conservation areas.</li> </ul>	The information required for decision-makers to discharge this duty is provided in sections 0 and 7.12.
Ancient Monuments and Archaeological Areas Act 1979 (as amended by the National Heritage Acts 1983 and 2002)	Provides for sites assessed to be of national importance to be included in a Schedule of Monuments. These sites are accorded statutory protection and Scheduled Monument Consent is required before any works are carried out.	Reference has been made to the schedule of monuments as set out in the National Heritage List for England (NHLE) in developing the scope of assessments (Volume 5, Annex 7-2, Criteria for Selection of Onshore Heritage Assets to be Assessed (Document Ref: 6.5.7.2) and 7-3, Scope of assessment of effects arising through change to setting of onshore heritage assets (Document Ref: 6.5.7.3)). No scheduled monuments have been identified as being directly affected.

Policy/legislation	Key provisions	Section where provision addressed
Planning (Listed Buildings and Conservation Areas) Act 1990.	Provides for a list of buildings of special architectural or historical interest. The buildings included in this list are classified as Grades I, II* and II, and are accorded statutory protection. More highly graded listed buildings (Grade I and II* are differentiated from Grade II listed buildings in NPS EN-1 5.8.14-15). Areas of special architectural or historic interest can be designated as conservation areas. Requires decision-makers to have special regard to the desirability of preserving (a) building or its setting or any features of special architectural or historic interest which it possesses, and to preserving or enhancing the character and appearance of Conservation Areas.	Reference has been made to the schedule of monuments as set out in the NHLE in developing the scope of assessments (Volume 5, Annex 7-2, Criteria for Selection of Onshore Heritage Assets to be Assessed (Document Ref: 6.5.7.2) and 7-3, Scope of assessment of effects arising through change to setting of onshore heritage assets (Document Ref: 6.5.7.3)). Potential direct effects to the listed anti-invasion defences at Pegwell Bay are considered at section 7.8. Note that for the DCO application the requirements of the Infrastructure Regulations and NPSs take precedence, where provisions differ.
The Hedgerow Regulations 1997	Set out criteria for identifying important hedgerows and require consent for their removal. Selection criteria include heritage-based considerations. Removal of an important hedgerow is deemed as permitted where a DCO which would require removal of a hedgerow has been granted.	The potential presence of Important Hedgerows under the Regulations is considered in Volume 5, Annex 7-1, Desk Based Assessment (Document Ref: 6.5.7.1).
The Protection of Military Remains Act 1986	The Protection of Military Remains Act 1986 sets out specific protections for aircraft which have crashed while in military service or vessels which have sunk or been stranded while in military service. It sets out a general prohibition on any disturbance or removal of such remains without a licence granted by the Secretary of State (SoS).	No known areas where military remains as defined by the Act are present have been identified. Mitigation proposals will have regard to the provisions of the Act.

Policy/legislation	Key provisions	Section where provision addressed
NPS EN-1	The NPS discusses the generic impacts on the historic environment associated with the construction, O&M and decommissioning of energy infrastructure. The NPS sets out the need to consider the impacts on both designated and non-designated heritage assets.	Effects on designated and non-designated heritage assets have been considered at sections 0 and 7.12.
	Where non-designated heritage assets are of equivalent significance to designated heritage assets, they are subject to the policy considerations that apply to designated heritage assets. (paragraph 5.8.5)	Non-designated heritage assets of equivalent significance to designated heritage assets (e.g. the Boarded Groin) are identified and assessed as appropriate in sections 0 and 7.12.
	Non-designated heritage assets of lesser significance should be considered within any decision making (paragraph 5.8.6).	Effects on non-designated heritage assets have been considered at sections 0 and 7.12 as appropriate.
	Field survey may be required to inform any assessment of significance (paragraph 5.8.9).	Initial walkovers and receptor visits have been undertaken to inform the assessment.
	Any application should contain sufficient information to allow heritage significance to be understood (paragraph 5.8.10).	Statements of significance of heritage assets are set out in sections 0 and 7.12.
	The nature of the significance of the heritage assets and the value that they hold for this and future generations should be taken into account in considering the impact of a proposed development on any heritage assets (paragraph 5.8.12).	The assessment presented in sections 0 and 7.12 has regard to the significance of heritage assets.

Policy/legislation	Key provisions	Section where provision addressed
	Development which would give rise to substantial harm to designated heritage assets should be exceptional, or for heritage assets of the highest significance (Grade I and II* listed buildings, scheduled monuments, designated battlefields, World Heritage Sites and grade I and II* designated registered parks and gardens), should be wholly exceptional. Harm to designated heritage assets of less than substantial magnitude should be weighed against the benefits of the proposal (paragraph 5.8.14).	No cases have been identified where substantial harm to the significance of a designated heritage asset would arise. Where less than substantial harm to the significance of a heritage asset has been identified, this has been identified here and then considered further in the Planning Statement (Document Ref: 8.2).
	Development giving rise to substantial harm to a designated heritage asset should only be permitted where necessary to deliver significant public benefits which outweigh the harm occasioned (paragraph 5.8.15).	No cases have been identified where substantial harm to the significance of a designated heritage asset would arise.
	Not all elements of a conservation area or World Heritage Site necessarily contribute positively to significance and the contribution of parts of such designations which may be affected should be considered (paragraph 5.8.16).	The contribution of different elements of area designations has been considered within the assessment set out at section 7.12.
	Provisions for the recording of at-risk heritage assets to mitigate against loss of evidential interest are set out at paragraphs 5.8.19 – 5.8.22.	Mitigation proposals will have regard to the provisions of NPS EN-1.

Policy/legislation	Key provisions	Section where provision addressed
NPS EN-3	NPS EN-3 contains no specific policy on onshore historic environment remains, referring back to the generic policies in NPS EN-1 Section 5.8, and specifically refers back to NPS EN-1 for the consideration of elements of the marine historic environment which are, at present located onshore (NPS EN-3 2.6.143).	The approach taken and assessment presented in this chapter follows the provisions within NPS EN-1.
National Planning Policy Framework (NPPF)	The NPPF does not set out policy for the testing of Nationally Significant Infrastructure Projects (NSIP). However, Section 12 of NPPF relates to the historic environment and is broadly consistent with the policies of EN-1.	The approach taken and assessment presented in this chapter is broadly consistent with the NPPF, but where the requirements deviate from NPS EN-1, provisions within the NPS have been followed.
National Planning Policy Framework consultation draft 2018	The NPPF does not set out policy for the testing of Nationally Significant Infrastructure Projects (NSIP). However, Section 16 of the consultation draft NPPF relates to the historic environment and is broadly consistent with the policies of EN-1.	The approach taken and assessment presented in this chapter is broadly consistent with the NPPF, but where the requirements deviate from NPS EN-1, provisions within the NPS have been followed.
Thanet Local Plan 2006 Saved Policies	Policy HE11 provides for assessment, comprising desk-based and/ or field work, to inform an understanding of the effects of a proposed development on archaeological remains.	Volume 5, Annex 7-1, Desk Based Assessment (Document Ref: 6.5.7.1) has been produced to meet the requirements of Policy HE11.
	Policy HE12 provides for protection or recording of archaeological remains likely to be affected by development.	Mitigation proposals have regard to the provisions of Policy HE12.
Dover District Local Plan (2002) Saved Policies	There are no saved policies relating directly to the historic environment, and policy context is determined by NPPF.	The approach taken and assessment presented in this chapter is broadly consistent with the NPPF, but where the requirements deviate from NPS EN-1, provisions within the NPS have been followed.

Policy/legislation	Key provisions	Section where provision addressed
Canterbury City Council Local Plan (2006) saved policies	Policy BE14 considers development which could affect a scheduled monument or other nationally important heritage asset or its setting.	This policy is relevant only to the assessment of effects arising through change to setting of the scheduled monument at Reculver which is considered from paragraph 7.12.221. This potential receptor of adverse effects is located within Canterbury, although its setting extends into other local authority planning areas and offshore.
Canterbury City Council Local Plan Publication Draft 2014 (emerging policy)	Policy HE1 considers development affecting heritage assets.	This policy is relevant only to the assessment of effects arising through change to setting of the scheduled monument at Reculver which is considered from paragraph 7.12.221.

7.2.3 Further guidance on the application of the policies set out in NPPF are contained within the National Planning Practice Guidance, which contains a specific section on Conserving and enhancing the Historic Environment (Ministry of Housing, Communities and Local Government 2018).

7.2.4 Relevant best practice standards and guidance are published by the Chartered Institute for Archaeologists (CIfA). For the purposes of this assessment, the relevant standards and guidance comprise:

- Standard and guidance for commissioning work or providing consultancy advice on archaeology and the historic environment (2014); and
- Standard and guidance for historic environment desk-based assessment (2017).

7.2.5 Historic England produce the Historic Environment Good Practice Advice in Planning (GPA) series, of which the relevant documents are:

- GPA 2: Managing Significance in Decision-Taking in the Historic Environment (2015); and
- GPA 3: The Setting of Heritage Assets (2017).

7.2.6 Further Historic England guidance includes *Conservation Principles* (English Heritage 2008), the revised consultation draft of *Conservation Principles* (2017), and the Historic England Advice (HEA) series.



### 7.3 Consultation and scoping

Table 7.2: Summary of consultation relating to the historic environment

Date and consultation phase/ type	Consultation and key issues raised	Section where provision addressed
28/03/2017 Initial Evidence Plan Meeting with Local Planning Authority (LPA) Officers	Agreement to develop a shortlist of heritage assets considered likely to be affected by the proposed scheme.	Volume 5, Annex 7-2, Criteria for Selection of Onshore Heritage Assets to be Assessed (Document Ref: 6.5.7.2) to be assessed as agreed with stakeholders.  Volume 5, Annex 7-3: Scope of assessment of effects arising through change to setting of onshore heritage assets as agreed with stakeholders.
17/05/2017 Initial Evidence Plan Meeting with Historic England	Agreement to develop a shortlist of heritage assets considered likely to be affected by the proposed scheme.	Volume 5, Annex 7-2, Criteria for Selection of Onshore Heritage Assets to be Assessed (Document Ref: 6.5.7.2) to be assessed as agreed with stakeholders.  Volume 5, Annex 7-3, Scope of assessment of effects arising through change to setting of onshore heritage assets (Document Ref: 6.5.7.3) as agreed with stakeholders.

Date and consultation phase/ type	Consultation and key issues raised	Section where provision addressed
16/11/2017 Meeting with Historic England and LPA Conservation Officers	Request for visit to be made to Port Regis School and for relevant heritage assets to be scoped into the assessment.  Request for assessment to consider visibility of the proposed development from Nelson Crescent and The Clock House, Ramsgate.	Port Regis School is considered at Section 7.12  Comments on visibility of the proposed development from Nelson Crescent and The Clock House have been added to the assessment of effects on the Ramsgate Conservation Area at section 7.12.
20/11/17 Telephone consultation with Simon Mason (KCC)	Discussion of archaeological exclusion zones.  Detailed consideration of the location of the Boarded Groin.  Understanding the nature of specific elements of Richborough Port likely to be affected.	Revisions to the Red Line Boundary have excluded the designated remains of the anti-invasion defences.  More detail has been added to relevant sections where potential effects on the Boarded Groin have been assessed at section 7.12.  Additional detail has been provided on the nature of heritage assets at Richborough Port likely to be affected by the proposed development at section 7.11.

Date and consultation phase/ type	Consultation and key issues raised	Section where provision addressed
<p>12/01/2018</p> <p>Historic England Section 42 Response</p>	<p>Noted agreement with scope, method and findings of the PEIR, but made specific observations on the following topics:</p> <p>Requested more detailed consideration of the views of Margate Conservation Area from the west.</p> <p>Requested more detailed information on effects on the Ferry Berth and transport infrastructure at Richborough Port.</p> <p>Undertake more detailed consideration of effects on the early-Roman site at Ebbsfleet Hill including further consultation with KCC and the excavators where appropriate.</p> <p>Noted that KCC would lead on comments regarding archaeological remains, but that HE would advise if requested.</p>	<p>More detail has been added to the discussion of change in the setting of the Margate Conservation Area at section 7.12.</p> <p>More detail has been added to the assessment of effects on Richborough Port at section 7.11.</p> <p>Further consultation regarding the effects on the early-Roman site at Ebbsfleet Hill has been undertaken with KCC and an updated assessment presented at section 7.12.</p>
<p>12/01/2018</p> <p>KCC Section 42 response</p>	<p>Noted agreement with scope, method and findings of the PEIR, but made specific observations on the following topics:</p> <p>Requested more detail on the assessment of effects on the visible remains of the Boarded Groin when details of the final cable route are known.</p> <p>Request further assessment of the assessment of effects on the Boarded Groin arising from the substation construction.</p> <p>Consider change to setting arising from perceptual severance of elements of the WWII anti-invasion defences arising from mounding/berms within the Country Park.</p>	<p>The assessment of effects on the visible elements of the Boarded Groin at section 7.12 has been updated and presented in more detail to reflect the revised design.</p> <p>The assessment of effects on the Boarded Groin arising from the substation construction at section 7.11 has been updated and presented in more detail to reflect the revised design.</p> <p>The assessment of effects on the anti-invasion defences at sections 7.11 and 7.12 has been updated to reflect the revised design.</p>

Date and consultation phase/ type	Consultation and key issues raised	Section where provision addressed
<p>12/01/2018</p> <p>TDC s42 Response</p>	<p>Noted agreement with scope, method and findings of the PEIR.</p> <p>Noted that KCC and HE would lead on comments regarding archaeological remains.</p>	<p>More detail has been added to the discussion of change in the setting of the Margate Conservation Area at section 7.12.</p>

### 7.4 Scope and methodology

- 7.4.1 While in this case, direct effects on heritage assets would only occur within the proposed Red Line Boundary, the study area for the assessment of direct effects on the onshore historic environment considered within the Desk-based Assessment (Volume 5, Annex 7-1, Desk Based Assessment (Document Ref: 6.5.7.1)) extended to 500 m in all directions from the onshore Red Line Boundary. This was to allow information on heritage assets in close proximity to Thanet Extension to be collected to fully understand the potential for as-yet unrecorded heritage assets to be present within the proposed development area. This includes areas which are in the intertidal zone. The archaeological potential of these areas is discussed at Volume 5, Annex 7-1, Desk Based Assessment (Document Ref: 6.5.7.1) to provide context for the assessment, but effects on heritage assets below Mean High Water Spring Tide (MHWS) are assessed in the offshore historic environment chapter (Volume 2, Chapter 13: Marine and Coastal Archaeology and HSC (Document Ref:6.2.13)) with the exception of the former fougasse at Pegwell Bay, which is an integral part of the onshore defences (section 7.8).
- 7.4.2 A criteria-based approach was undertaken to define a study area for the assessment of indirect effects on heritage assets. These criteria have been agreed with the relevant consultees (Volume 5, Annex 7-2, Criteria for Selection of Onshore Heritage Assets to be Assessed (Document Ref: 6.5.7.2)) and have defined a scope of assessment that considers effects on heritage assets along the Kent Coast between Sheppey in the north-west to Dover in the south (Volume 5, Annex 7-3, Scope of assessment of effects arising through change to setting of onshore heritage assets (Document Ref: 6.5.7.3)).
- 7.4.3 For purposes of determining the DCO application, the Infrastructure Planning (Decisions) Regulations 2010 are followed. This requires that decision-makers to have regard for the desirability of preserving:
- Listed buildings, any features which contribute to their special interest and their settings;
  - Scheduled monuments and their settings; and
  - The character and appearance of conservation areas.

- 7.4.4 This assessment is intended to provide sufficient information to make an informed determination in line with the Infrastructure Planning (Decisions) Regulations. This assessment also follows the requirements of the NPS, and is informed by the NPPF where this provides further detail (such as in providing definition of setting and heritage interests etc.). Where there is an overlap, the guidance and requirements in the Regulations and NPS are followed.
- 7.4.5 For purposes of the Regulations, if the assessment determines that where the contribution that setting makes to the significance of a heritage asset is not changed and the asset does not lose significance as a result, both the setting and the asset are considered to be preserved (at least in respect of their heritage interests).
- 7.4.6 The assessment proceeds from the basis that the *significance* of an asset is what is of concern (following both the NPS and NPPF), and follows Historic England's guidance in considering that setting is important in respect of what it contributes to an asset's significance, and the way in which that significance is able to be understood and appreciated. Significance here is the sum of any asset's heritage interests and values.
- 7.4.7 Where this assessment differs from that presented in the PEIR it is due to the need to focus on the potential impact upon the significance of an asset and just not the degree of *change* in setting. This more closely accords with policy and guidance which require consideration of significance such as in EN 1 (Paragraph 5.8.10 etc.), as well as in Historic England's Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2<sup>nd</sup> ed., 2017) which makes it clear (at Paragraph 9) that what is important about setting is the contribution it makes to the significance of any asset, rather than setting being an asset in and of itself. The methodology section has been amended to enable this process to be clearer and more consistent when read through to the assessments presented in 7.11 and 7.12.

#### Direct effects

- 7.4.8 Direct effects on heritage assets result from physical damage or disturbance, which gives rise to a loss of heritage significance. Consequently, it is only those assets which are within the footprint of the proposed development and associated enabling works such as, intrusive surveys, site compounds and access tracks which are potentially subject to direct effects. In that archaeological features are not always evident, a DBA (Volume 5, Annex 7-1, Desk Based Assessment (Document Ref: 6.5.7.1)) has been undertaken to examine this potential and the potential locations of archaeological heritage assets compared to the proposed development layout, to ascertain the potential for heritage assets to be affected.
- 7.4.9 As conclusions from DBA are predictive and probabilistic, there are some cases where the potential presence of heritage assets or their significance remains difficult to state with confidence. It has been noted where further survey work to ascertain this potential would allow a robust assessment of effects to be set out.

#### Indirect effects

- 7.4.10 Indirect effects are defined here as those which result in potential change to heritage significance but do not give rise to physical damage or disturbance to the asset. In this context, these effects will generally arise through change to the settings of heritage assets. Setting is not explicitly defined in either statute or NPS-EN1. It is defined in NPPF as: "The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve."
- 7.4.11 Historic England guidance (GPA 3, 2<sup>nd</sup> edition, 2017) follows this definition, and sets out a methodology for considering any effects on the significance of heritage assets arising from change to setting. The guidance accords with the NPS and NPPF in recognising that it is effects on the significance of an asset that are of concern. Paragraph 9 specifically states that setting is not an asset or a designation in itself; what is important about setting is the contribution it makes to the significance of the asset.
- 7.4.12 Assessment of settings is primarily associated with designated heritage assets or non-designated heritage assets of equivalent heritage significance (where such assets are identified). The scope of the assessment has been established using criteria agreed with consultees, applied with reference to desk-based research, the Zone of Theoretical Visibility (ZTV) of Thanet Extension and site visits to identify those assets with settings which might be sensitive to change arising from development. This process of appraisal has been through engagement with consultees and follows Step 1 of the five-step sequential process set out in Historic England (2017) guidance.
- Step 1: Identifying the heritage assets affected and their settings;
  - Step 2: Assessing whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);
  - Step 3: Assessing the effect of the proposed development on the significance of the asset(s);
  - Step 4: Maximising enhancement and minimising harm; and
  - Step 5: Making and documenting the decision and monitoring outcomes.
- 7.4.13 In order to better understand the potential effect, then a clear statement of the asset's overall significance is required, as well as the contribution that setting makes to that significance, as it is the final effect on the overall significance of an asset that is being assessed, not simply the degree to which the contribution made by its setting is changed.

## 7.5 Assessment criteria and assignment of significance

### Methodology for prediction of effects

7.5.1 To understand the significance of direct effects, baseline data has been reviewed to:

- Identify known or suspected archaeological sites within the Red Line Boundary; and
- Characterise the heritage resource from the study area.

7.5.2 Comparison of the distribution of known and potential archaeological features with location and extent of the proposed construction works allows the potential extent and nature of any direct disturbance to be characterised.

7.5.3 The assessment of effects arising from change in setting follows the approach set out by Historic England. In this case, the potential for loss of heritage significance is most likely to occur as a result of intervisibility or direct views between the asset and the development. Change to views of an asset from a third viewpoint, even where there is no direct intervisibility between development and asset, may also be relevant as maybe non-tangible historic or other associations. However, it is important to consider that simple intervisibility between and asset and the Development, or presence in views, is not in and off itself an adverse effect. There has to be specific “harm” to the significance of the asset.

7.5.4 In addition to purely visual considerations, other effects of the development, such as noise, may also have an effect, although this is normally only relevant in relatively close proximity to the proposed development. These effects are understood in terms of the relationship of the asset with its current setting and may be positive, enhancing the heritage significance of the asset, value-neutral or harmful, depending on the nature of the change, the character of the setting and its contribution to the heritage significance of the asset.

### Significance evaluation methodology

7.5.5 The assessment of the significance of any effect on a heritage asset is largely a product of the heritage significance of an asset and the magnitude of the effect that may give rise to harm, qualified by professional judgement. An assessment of effects on a heritage asset involves an understanding of the heritage significance of the asset and in the case of an indirect effect, the contribution of the setting to the heritage significance of the asset. The effect being assessed is whether the asset loses significance due to of a reduction in the contribution that its setting makes to that significance, as a result of development within that setting. Policy sets out that the level of detail should be proportionate to the heritage significance of the heritage asset and no more than is sufficient to understand the potential impact of the proposal.

7.5.6 Guidance discusses the conservation of the heritage significance of heritage assets, as change is an inevitable process, but one that can be managed. Heritage significance is not necessarily dependent on the preservation of a feature as is and can be enhanced through sensitive management. EN-1 (DECC 2011), paragraph 5.8.13 directs LPAs to take account of viable uses that sustain the significance of the historic environment, consistent with the conservation of heritage assets.

7.5.7 Rather than just characterising the potential physical effects of development, any assessment therefore needs to understand the effects on the heritage significance of heritage assets and/ or significant places. The heritage significance of the asset is determined by reference to the heritage interests set out in EN-1. These are:

- Archaeological interest: the potential of a place to yield evidence about the past;
- Historic interest: how the past can be connected to the present through a place through association with or illustration of the past; and
- Architectural/ artistic interest: how sensory and intellectual stimulation is drawn from a place either through design or fortuitous development over time.

7.5.8 For the purposes of assessing the significance of effects in EIA terms, heritage significance has also been assigned to one of five classes, with reference to the heritage interests described above and relying on professional judgement as informed by policy and guidance. The hierarchy given in Table 7.3 reflects the NPS distinction between designated and non-designated heritage assets. The NPS further distinguishes between designated assets of the highest heritage significance (i.e. scheduled monuments, protected wreck sites, battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites) and other designated heritage assets. This further distinction is relevant to planning policy, but has less influence on the establishment of the significance of an effect in EIA terms (and Listed Buildings of whatever grade are subject to the same legal protection in any case).

7.5.9 Effectively, designation of an asset is a recognition of the heritage interests and value inherent within that asset, which are deemed worthy or statutory protection. These assets are therefore typically regarded as more important than non-designated heritage assets, except where provided for in the Regulations and in the NPS (e.g., where non-scheduled assets are of demonstrably equivalent importance to a scheduled monument). The sensitivity of an asset to change (as opposed to simply its accorded level of importance) is discussed within the assessment text provided in section 7.11 and 7.12 below, as appropriate.

7.5.10 The significance of identified heritage assets is defined in Table 7.3, following the definition of heritage significance set out in NPS EN-1 (DECC 2011). The phrase ‘heritage significance’ is used where appropriate to avoid confusion between the significance of a heritage asset in policy terms and the significance of effect.

**Table 7.3: Importance/Sensitivity of the receptor**

Receptor sensitivity/ importance	Description/ reason
Very High	World Heritage Sites, which are internationally important. Assets of acknowledged international importance Assets that can contribute significantly to acknowledged international research objectives Historic landscapes of international value (designated or not).
High	Scheduled Monuments and undesignated assets of Schedulable quality and importance Listed Buildings Archaeological Assets that can contribute significantly to acknowledged national research objectives Designated and undesignated historic landscapes of outstanding interest (including Grade I and II* Registered Historic Parks and Gardens) Non-designated landscapes of high quality and importance, and of demonstrable national value.
Medium	Designated or undesignated archaeological assets that contribute to regional research objectives Conservation Areas Designated special historic landscapes of special historic interest (including Grade II Registered Historic Parks and Gardens).
Low	Non-designated Heritage Assets, including locally listed buildings, and other buildings that are considered to be of local interest. Archaeological Assets of limited value, but with potential to contribute to local research objectives.
Negligible	Assets with very little or no surviving archaeological interest/Buildings with little or no value at local or other scale. Landscape with little or no significant historical interest.

7.5.11 In consideration of sensitivity and importance, designation status (and its implicit recognition of the value of heritage interest within an asset deserving of such protection) is a starting point. However, some assets may be more or less sensitive to the anticipated changes from the proposed Development, whatever their grading. The assignment of an asset to a particular level of sensitivity or importance is based in part of designation and in part on professional judgement on the degree to which an asset is sensitive to the type of change expected. The text assessments presented in 7.11 and 7.12 take this into account.

7.5.12 Direct effects are qualified by the extent and nature of remains associated with an asset which would be disturbed or lost, and the effect of this loss on the heritage interests (heritage significance) of the asset. In respect of buried archaeological remains with no visible above ground remains, this would normally result in the loss of archaeological interest, but elements of architectural and historic interest can also be affected.

7.5.13 In this context, the effects of change in the setting of a heritage asset may depend on individual aspects of that setting, and assessments must be, by their nature, specific to the individual assets being considered. Recent guidance (Historic England, 2017) advises that the following aspects of setting should be considered in addition to any identified key attributes:

- The physical surroundings of the asset, including its relationship with other assets;
- The way the asset is appreciated; and
- The asset's associations and patterns of use.

7.5.14 It should also be noted that not all change necessarily detracts from the heritage significance of the asset. In the assessment of effects on the setting of heritage assets, the nature of the effect, i.e. positive, negative or neutral, of development is a subjective matter. Change is usually taken to constitute a negative effect where it will introduce new and different elements to the setting of designated features, either to an imagined contemporary setting or to their existing setting. However, this change will only be assessed as generating a significant (adverse) effect where it reduces the contribution made by the setting of an asset to such a degree (magnitude) that the overall significance of the asset is diminished or otherwise harmed. The degree to which this overall significance is affected is what is being assessed and is reflected in the final assessed significance score.

7.5.15 Effects on receptors are assigned to one of four classes of magnitude, defined in Table 7.4.

**Table 7.4: Magnitude of impact**

Magnitude	Definition
Very High	Total loss of or major alteration to a site, building or other feature (e.g., destruction of archaeological feature, demolition of a building).  Fundamental change in setting and/or disassociation of asset from its setting, such as by blocking or severance of key views so as to cause a wholesale reduction in the contribution of that setting to the significance of that asset, and hence a significant loss of the asset’s overall significance.
High	Major physical damage to or significant alteration to a site, building or other feature.  Extensive change (e.g., loss of dominance, intrusion on key view or sightline) to the setting of a Scheduled Monument, Listed Building or other feature registered as nationally important, which may lead to a major reduction in the contribution of that setting to the significance of the heritage asset itself, and hence a loss of overall significance for that asset.
Medium	Damage or alteration to a site, building or other feature. Encroachment on an area considered to have a high archaeological potential.  Change in setting (e.g., intrusion on designed sight-lines and vistas) to monuments / buildings and other features, which may lead to a moderate reduction in the contribution of that setting to the significance of the heritage asset, and hence a reduction in the asset’s overall significance.
Low	Minor damage or alteration to a site, building or other feature. Encroachment on an area where it is considered that low archaeological potential exists.  Minor change in setting (e.g., above historic skylines or in designed vistas) of Monuments, Listed Buildings, sites and other features, which may lead to a small reduction in the contribution the setting makes to the significance of the heritage asset, with an appreciable loss in the assets’ overall significance.
Negligible	No physical effect.  Slight or no change in setting, with no or very limited change in the contribution that setting makes to the significance of the asset, and no loss of overall significance.

7.5.16 Effects are considered to be significant or not significant in EIA terms according to the matrix in Table 7.5. For this assessment, a Moderate or Major effect would be considered to be significant in EIA terms, depending on the heritage significance of the asset (above) and the exercise of professional judgement.

7.5.17 In making the final judgement on the significance of an effect, consideration is given not only to the importance of an asset in terms of its designation, but also to the sensitivity of an asset to the type of change or impact anticipated, as well as the magnitude of that change. For example, a highly graded Listed building may have a high level of importance by virtue of its designation, but may be less susceptible to a change in setting (and hence potential reduction in significance) arising from the Development proposals. This may be due to the asset’s form, or location or its heritage interests are not such that its significance relies on a visual contribution from setting, so that its heritage interests and hence overall significance is not harmed; conversely if an asset’s significance is entirely derived from a visual contribution from its setting, then a higher level of significance may be accorded to the effect on the assets significance from the anticipated impact, whatever the level of grading of the asset. The final score of the significance of any affect is informed by professional judgement and based on consideration of all of these factors, and set out in the relevant assessment text as appropriate.

**Table 7.5: Significance of potential effects**

		Magnitude				
		Very High	High	Medium	Low	Negligible
Sensitivity/Importance (Heritage Significance)	Very High	Major	Major	Moderate	Minor	Not Significant
	High	Major	Major	Moderate	Minor	Not Significant
	Medium	Moderate	Moderate	Moderate	Minor	Not Significant
	Low	Minor	Minor	Minor	Not Significant	Not Significant
	Negligible	Minor	Not Significant	Not Significant	Not Significant	Not Significant

*Note: shaded cells are defined as significant effects.*

## 7.6 Uncertainty and technical difficulties encountered

- 7.6.1 There are two principal areas of uncertainty in this chapter of the ES. The first relates to the nature of the archaeological baseline. The desk-based studies on which this assessment has been based are predictive and do not provide a definitive understanding of as-yet unrecorded archaeological heritage assets that may be affected by the proposed development. The second area of uncertainty relates to detail of the proposed development, which has been refined since the proposals set out in the Section 42 consultation, but retains a degree of flexibility within the Rochdale Envelope approach.
- 7.6.2 The nature of the site area means that the character of as-yet unrecorded heritage assets can be predicted with a reasonable degree of confidence, although the condition and distribution of such heritage assets is less well-defined. The implications of this uncertainty are discussed in more detail in the assessment of direct effects (section 7.9).
- 7.6.3 Additionally, some of the assets considered in this assessment have been included due to location within the ZTV, as prepared for and used in the SLVIA. It is noted that the ZTV is a bare -earth model, and does not take into account any screening afforded by vegetation, buildings etc, which may prevent or reduce actual visibility. The ZTV assumes visibility at 2 m above ground level and is based on a 50 m data grid digital terrain model. This provides a rather coarse grain and the actual degree of visibility of the Development may be different at any given location than predicted. Finally, the ZTV does not reflect the degree to which visibility can decrease with distance; the nature of what is visible at 3 km will differ considerably from what is visible at 10 km, although both are indicated by the ZTV to have the same level of visibility. Further details on the ZTV can be found in section 12.6 of Chapter 12 *Seascape, Landscape and Visual Assessment* of this ES.
- 7.6.4 Design iterations subsequent to the submission of the Preliminary Environmental Information Report (PEIR) have refined the parameters of development, but the detail of the development proposals remains liable to change within these stated parameters, which are sufficiently defined, to allow a realistic worst-case approach to assessment to be adopted.

## 7.7 Existing environment

- 7.7.1 The study area for direct effects is located in a rich and diverse historic landscape that holds evidence for human activity from the earliest occupation of Britain to the present day.
- 7.7.2 The Isle of Thanet is situated on a promontory, which was formerly separated from north Kent by the Wantsum Channel. The land generally slopes westwards from the chalk cliffs along the North Sea coast and southwards to the low lying marshland around Pegwell Bay. The south side of the Isle of Thanet features three low hills rising out of a flat plain of alluvium, including Ebbsfleet Hill and Cottington Hill. These hills formed a low peninsula known as the Ebbsfleet Peninsula during the active life of the Wantsum Channel.

- 7.7.3 There is substantial evidence for prehistoric occupation of Thanet, particularly of the land on the margins of the wetland of the Wantsum Channel, which has recently been enhanced by substantial excavations along the line of the East Kent Access Road and at Weatherlees Hill Water Treatment Works. These excavations have also produced evidence for Romano-British activity around Ebbsfleet Hill, including potential evidence for the earliest Roman activity in England.
- 7.7.4 The proximity of Thanet to continental Europe and the apparent suitability of the coast here for landing in the pre-modern period means that Ebbsfleet is also recorded as the initial landing place of the Anglo-Saxons in England and as the landing place of the Augustinian Mission. These claims are impossible to verify, and in the former case, almost certainly represent a literary simplification of a much more complex process, but attest to the significance of the low-lying coast of Thanet as a point of entry to England. Remains of early medieval activity have been observed at Cliffsend and in the wider area outside the study area.
- 7.7.5 During the medieval period, natural change in the landscape resulting from the gradual silting of the Wantsum Channel and the continuing development of the Deal Spit, Stonar Bank and Sandown Spit was accelerated by human reclamation of former marshland along the Wantsum Channel and the Thanet coast by sea walls and floodbanks, of which elements such as The Abbot's Wall and the Boarded Groin survive. This landscape change also affected the fortunes of the towns of the area, resulting in the abandonment of Stonar after it was attacked by the French and subsequently inundated by the sea in the 14th century. Geoarchaeological evidence for these coastal and anthropogenic processes is a key contributing element to the heritage significance of the area, providing a context for the other archaeological remains and defining the nature and extent of human activity in the area.
- 7.7.6 The area appears to have been primarily agricultural during the post-medieval period, with the gradual decline of Sandwich resulting from changes to navigation and the size of vessels used, and a harbour more suitable for deep water vessels was built at Ramsgate in the mid-17th century.
- 7.7.7 During the First World War (WWI), the area became a major embarkation point for men and military materiel being transported to the Western Front, with the construction of a military port at Richborough. This site was reused during the Second World War (WWII), and the suitability of this part of the Kent Coast as an invasion site led to the construction of substantial anti-invasion and anti-aircraft defences.
- 7.7.8 Modern development of the area has included the construction of the Richborough Power Station and other industrial development within the former Richborough Port site, the rapid expansion of the former hamlet of Cliffsend, and the construction of golf courses between Stonelees and Cliffsend. Landfill sites are recorded at Pegwell Bay and Stonelees Golf Centre.

7.7.9 This modern development is likely to have caused substantial but localised disturbance, and the presence of archaeological remains of potentially high significance is likely in areas that have not previously been disturbed.

7.7.10 Within the wider area, there are a number of designated heritage assets along the north and east Kent coast, many of which are of the highest significance, comprising mainly Grade I and II\* listed buildings, and scheduled monuments. These reflect the historic development of the area, and for the purposes of this report primarily relate to the interaction of the inhabitants of the area with the sea, whether for migration, fishing, trade, warfare or leisure. Individual heritage assets identified as potentially affected by Thanet Extension are discussed in more detail at sections 0 and 7.12 below.

## 7.8 Direct effects

7.8.1 Direct effects on heritage assets would occur where heritage assets are materially disturbed or removed by construction activities. This can occur to upstanding remains, such as structures and earthworks, or buried remains that are not visible. Consequently, only heritage assets within the footprint of the proposed development would be affected.

7.8.2 The proposed onshore cable corridor contains a number of recorded archaeological features and former structures, some of which may have been disturbed or destroyed, others which survive as coherent heritage assets. Site visits were undertaken in April 2017 to confirm as far as possible the location and condition of identified features and to inform the production of the DBA. Where specific observations would have a bearing on the assessment, these have been discussed in the relevant assessments at section 7.11. Identified heritage assets are listed at Table 7.6.

**Table 7.6: Recorded heritage assets within the proposed Red Line Boundary (Figure 7.1)**

Parcel	Reference	Description
8,14	1413803	Grade II listed WWII anti-tank pimples and cylinders and associated pillbox at Pegwell Bay – The centroid point identified as the asset location in NHLE is located within the proposed Red Line Boundary, but the identified designated remains are all outwith the boundary. These represent visible remains of a wider system, of which further remains may survive.
14	TR36 SW 141 MKE 39115 NHLE 1413803	Pillbox (Type FW3/24). This asset survives as a building and is directly adjacent to the Red Line Boundary.
7	MKE15892 TR 36 SW 108	Possible medieval farmstead, Ebbsfleet Farm, Ramsgate (HER location shows site in Parcel 7 which appears erroneous). This feature may survive as archaeological remains, but is unlikely to be present within the site.
14	MWX43205	Two WWII military buildings, located to the north of a military site just north of entrance to River Stour, Pegwell Bay. These features do not survive as buildings but archaeological remains may survive.
7,14	MWX43182	WWII beach scaffolding, Pegwell Bay. These features may survive as archaeological remains.
7,14	MWX43183	WWII coastal defence measure in form of wire obstacle, Pegwell Bay. These features may survive as archaeological remains.
5,9	MWX43159	Cluster of WWII structures and gun pits incorporated into a larger coastal military site, Pegwell Bay. These features may survive as archaeological remains.
9	MWX43231	Two military structures incorporated into a larger military site, Pegwell Bay. These buildings have been demolished but traces of their foundations



Parcel	Reference	Description
		may survive as archaeological features.
5,8,9,14	MWX43195	WWII military site, north of entrance to River Stour, Pegwell Bay. Elements of the wider site may survive as archaeological features.
3,4,5,7,8,9,10,14	MWX43487 TR 36 SW 414	Richborough Port. Elements of the wider site outwith the Red Line Boundary survive as standing buildings and may survive as archaeological features within the Red Line Boundary.
3	MWX43258	WWII open structure on eastern bank of River Stour. This feature may survive as archaeological remains.
5,7,8,9,14	MWX43203	WWII lengths of barbed wire, located within a military site, north of River Stour, Pegwell Bay. These features may survive as archaeological remains.
8	MWX43204	WWII slit trenching and associated defensive features located within a military site, north of River Stour, Pegwell Bay. These features may survive as archaeological remains.
5,8,14	MWX43185	WWII anti-tank blocks along the coastline of Pegwell Bay, extending south to a possible pillbox these features survive, outwith the Red Line Boundary as NHLE list entry 1413803. Archaeological remains may survive within the site.
3,4,5	MWX43282	Weatherlees Siding, Richborough Port. The tracks were taken up at the abandonment of Richborough Port, but elements of the trackbed may survive as archaeological features.
8,9,14	MKE42006 TR 36 SW 194	RAF Salvage Yard, Richborough Port. Elements of this site may survive as archaeological features.
3,4	TR 36 SW 187 MKE42008	New Wharf, Richborough Port. Elements of this site may survive as archaeological features.

Parcel	Reference	Description
3	MWX43551	Sidings, Richborough Port. The tracks were taken up at the abandonment of Richborough Port, but elements of the trackbed may survive as archaeological features.
4	MKE56634 TR 25 SE 333	East Kent Light Railway. The tracks were taken up following the abandonment of Richborough Port, but elements of the trackbed may survive as archaeological features.
4,7,9,14	MKE76084 TR 36 SW 203 AMIE 469523	Boarded Groin. This asset survives as an earthwork outside the Red Line Boundary and may survive as archaeological remains within the Red Line Boundary.
3,4	AMIE 1358057	Deal Branch Railway. The tracks were taken up following the abandonment of Richborough Port, but elements of the trackbed may survive as archaeological features.
4	AMIE 501847	Richborough Port Station. This asset does not survive as a built structure but may be present as archaeological remains.
13	MWX 43848	St Augustine's Coastguard Station. This asset does not survive as a built structure but may be present as archaeological remains.
4	MKE86977	Sheep pens north north-east of the Red Lion Inn. This asset does not survive as a built structure but may be present as archaeological remains.

7.8.3 The DBA (Volume 5, Annex 7-1, Desk Based Assessment (Document Ref: 6.5.7.1)) considered the potential presence of archaeological remains within the Red Line Boundary as defined at the time of production and within a 500 m study area. While the Red Line Boundary has since been revised to reflect refined design proposals, the Red Line Boundary remains within the area considered by the DBA. The cable corridor is located within parcels identified in the Volume 5, Annex 7-1, Desk Based Assessment (Document Ref: 6.5.7.1) which have varying potential for previously unrecorded heritage assets to be present. These are summarised at Table 7.7 and shown on Figure 7.1.

**Table 7.7: Summary of potential presence and heritage significance of archaeological remains within the proposed Red Line Boundary**

Parcel	Potential: near surface remains	Potential: geoarchaeological deposits	Significance	Comments
3	Negligible	Medium	Low - Medium	Near surface remains have been substantially disturbed by modern industrial use but more deeply buried deposits may be present.
4	Negligible	Medium	Low - Medium	Near surface remains have been substantially disturbed by modern industrial use but more deeply buried deposits may be present.
5	Medium	High	Low - Medium	Remains associated with past use of the River Stour may be present, and the parcel is located in the former Wantsum Channel.
7	High	High	Low - Medium	There are recorded WWII remains in this parcel, which is also located in the former Wantsum Channel.
8	Low	High	Low - Medium	Parcel comprises land reclaimed from the Wantsum Channel in the medieval period
9	Low	High	Low - Medium	Parcel comprises land reclaimed from the Wantsum Channel in the medieval period with significant disturbance of the ground surface in the modern period.
10	High	High	High	Remains of prehistoric and Romano-British activity have been observed at and around Weatherlees Hill. This parcel is in a transitional area between the Wantsum channel and an island or part of the Thanet Mainland, and geoarchaeological study is likely to inform understanding of the Romano-British site.
14	Negligible	Negligible	N/A	This parcel is former quarry and landfill.

7.8.4 In general, while there are extensive records of past activity within the site, much of this is related to military use which would have either left limited archaeological remains or would have been significantly disturbed during the decommissioning of the military sites and subsequent industrial use.

7.8.5 There are, however, specific areas within the site, where the presence of archaeological remains is more likely. These are:

- The Boarded Groin. The Boarded Groin is one of a number of medieval floodbanks stretching along the banks of the Stour. It extended from Richborough Port in the south, almost to Cliffsend in the north. It is still visible as an earthwork feature along the southern side of Pegwell Bay, and is preserved as a ditch line along the west side of St Augustine's Golf Club. It is believed that the Boarded Groin has been either buried or disturbed by past land fill at Pegwell Bay Country Park, and by modern industrial use at Richborough Port. This asset is of Medium to High significance, primarily for archaeological interest. Visible elements of this asset also hold historic and aesthetic interest, as illustrative of the reclamation of the Wantsum Channel and for its contribution to the landscape character. Well-preserved elements, such as the stretch along the southern edge of Pegwell Bay, are considered to be of equivalent significance to a scheduled monument. It is possible that elements of other floodbanks of indeterminate date which are shown on early Ordnance Survey mapping could survive within the proposed substation options area;

- Anti-Invasion defences at Pegwell Bay. These defences comprised permanent, or at least robust, structures, such as concrete pill-boxes and anti-tank obstacles as well as more ephemeral features, such as beach scaffolding, barbed wire entanglements and a flame defence or Fougasse, comprising a network of fuel tanks and pipes which would have allowed for the sea to be 'set on fire' during an attempted invasion. Visible elements of these defences survive at various points, primarily at the southern end of Pegwell Bay, where concrete posts were set up along the Boarded Groin, at the north end of Pegwell Bay, where the base of the battery/ sea defence observation post, elements of the Fougasse and some concrete 'pimples' survive along the east side of Sandwich Road, and at the entrance to Pegwell Bay Country Park, where a concrete pillbox survives (Architectural Archaeology 2013). These features have been listed at Grade II as a coherent group and are of High significance for archaeological, historic and architectural interest. Other elements of the defensive scheme, such as the beach scaffolding and barbed wire entanglements were removed shortly after WWII and are unlikely to have left any coherent remains, although traces of features such as slit trenches or pipe trenches may survive. These elements would be of lesser significance, primarily for archaeological interest, though historic interests are latent. Concrete pads and bases were observed to the east of the cable route corridor during the walkover, and it is likely that these were elements of these defences. No such remains were observed within the Red Line Boundary, although the vegetation cover in this area means that it is not possible to be definitive. It is also possible that additional features such as concrete bases for weapons pits or additional anti-tank obstacles survive either as buried archaeological remains or have not yet been observed due to vegetation growth. This is particularly likely along the east side of Sandwich Road, where a number of recorded features are present in a discontinuous line, suggesting the presence of further features. Where these remains survive, significance will depend on preservation and their contribution to the understanding and experience of the overall scheme, but such remains could be of High significance where they are clearly and visibly associated with the designated defences; and

- Military Supply base at Richborough Port. A military supply depot was established at Richborough during WWI, supplying the western front with men and munitions, which were carried to France on three purpose-built rail ferries. The site was subsequently used during WWII. This supply depot was a substantial and complex installation, comprising railway lines, sidings and yards, warehousing and open storage areas, wharfage and loading facilities, including a pioneering roll-on roll-off rail ferry berth, elements of which are still visible in the intertidal zone. Richborough Port was defended by a network of defences that were distinct from, but presumably incorporated and overlapped with elements of the anti-invasion defences. The majority of the military buildings and installations have since been demolished or removed during the decommissioning of the site and modern redevelopment for industrial use. Some elements of the supply depot may survive as archaeological features, although preservation is likely to be variable and individual elements of the port are likely to be of limited significance. Some features, such as building foundations or rail track beds are likely to be of limited significance from archaeological interest, although better preserved features may also hold historic interest. Individual elements of this asset would be of Low to Medium significance, depending on their preservation and nature with visible structural remains, or particularly informative archaeological deposits, being of higher significance. Upstanding elements of the ferry berth were removed at the end of WWI and were re-erected at Harwich (NA MUN 4/6825; Historic England, 2018).
- 7.8.6 Evidence for pre-modern archaeological remains within the site is sparse. The site area appears to comprise land that was been reclaimed from the Wantsum Channel during the medieval period, and to have remained in primarily agricultural or pastoral use until the early 20<sup>th</sup> century. It is not considered likely that any coherent remains of pre-modern periods are present close to the existing ground surface within the site. Consequently, while there is a potential for previously unrecorded heritage assets to be present, it is not anticipated that any significant adverse effect would arise. It is, however, recommended that archaeological mitigation be designed to allow for the potential for such remains to be identified and recorded during works.
- 7.8.7 It is likely that deposits of geoarchaeological interest are present throughout the site area, although the Stour Basin Characterisation Project notes that these are expected to be deeply buried. These deposits could contain archaeological material dating from early prehistory, and could also contribute to understanding of the context, history and use of the Roman port sites located around the mouth of the Stour Estuary. Geoarchaeological boreholes at and near Richborough Energy Park identified significant depths of estuarine sands and silts of limited archaeological value, to depths of around 8 to 10 m below existing ground level (Archaeology South East 2017). While these results cannot be directly extrapolated, it is likely that deposits of geoarchaeological interest would be affected only by very deep excavation or activities such as directional drilling, although the exact depths at which these deposits are present within the site is not known at present.

- 7.8.8 Results from offshore geotechnical work have identified the presence of former channels or valleys, which contain land surfaces inundated and buried towards the end of the Pleistocene, incised into the exposed chalk bedrock. The onshore deposits in this area comprise primarily Holocene deposits relating to the silting of the Lydden and Wantsum channels and more recent accumulation of silts and saltmarsh within Pegwell Bay. Pleistocene deposits have been demonstrated to be present at locations within the Wantsum Channel, but there is not a continuous deposit sequence that stretches into the English Channel from the Wantsum.
- 7.8.9 Subsequent to the completion of the scoping exercise, it was publicly announced that a Romano-British site at Ebbsfleet Hill was thought to have been one of the landing sites used by Julius Caesar during his invasion of Britain in 54 BC (Fitzpatrick 2018). This interpretation had been suggested before, and the potential presence of related remains had been considered during the production of the PEIR, but the potential presence of associated Romano-British archaeological remains was not considered likely. This conclusion was reviewed during production of the Environmental Statement chapter. This site is located approximately 750 m to the west of the nearest point of the proposed cable. At the time that this site was occupied, the area in which the pipeline and substation construction is planned is thought to have been located within the mouth of the Stour Estuary, a suggestion which is supported by previous archaeological investigation (Wessex Archaeology 2008, Amec Foster Wheeler 2017). These investigations have identified significant depths of estuarine silts immediately to the west of the proposed cable route, consistent with the interpretation of this area comprising material which accumulated in the mouth of the Stour estuary following the construction of the Boarded Groin and associated floodbanks in the medieval period. There are no records of any Romano-British material having been recovered from area within the Red Line Boundary. It is consequently concluded that the proposed development would not have any direct effect on Romano-British remains associated with the Ebbsfleet Hill site. The effects caused by change to the setting of the Ebbsfleet Hill site, including potential disturbance of deposits of geoarchaeological interest which have the potential to inform the understanding of its landscape context, by the proposed development have been considered in paragraphs 7.12.110 to 7.12.111.

## 7.9 Indirect effects

- 7.9.1 Indirect effects would occur as a result of change to setting of designated heritage assets which so reduced the contribution to the significance of those assets made by that setting that the overall significance of those assets is diminished or otherwise harmed. In this case, change would arise primarily during the O&M phase as a result of long-term or permanent changes to the setting of the asset resulting from the construction of Thanet Extension.

- 7.9.2 The magnitude of effect depends on the extent to which change to setting affects the historic, architectural or archaeological interests of the heritage asset (its heritage significance): how the change affects the way in which the interests that make up that significance are understood or appreciated as a feature that is valued for its historic interests. Consideration has been given to onshore and offshore elements of Thanet Extension as discussed at Volume 5, Annex 7-3 and section 7.12. Perceptibility of Thanet Extension would not necessarily give rise to an adverse effect, but assessment needs to consider, for example, how visibility of Thanet Extension in views to sea that contribute to an asset's historical significance, or where turbines (Wind Turbine Generators: WTGs) or other elements of Thanet Extension are juxtaposed with heritage assets in views that allow architectural interests to be appreciated, would affect the significance of the asset.
- 7.9.3 Receptor-specific discussion of these issues is included at section 7.12, but there are also important contextual factors that are common to many assets. These include:
- 7.9.4 The presence of other WTGs in the setting of heritage assets;
- The status of the English Channel and Thames approaches as busy and established shipping lanes; and
  - The variable visibility experienced under typical weather conditions.
- 7.9.5 The presence of other WTGs in the setting of heritage assets could be taken as reducing the sensitivity to change, as the proposed Thanet Extension WTGs would not necessarily be incongruous additions to an existing context. The interaction of different wind energy developments at different scales and proximities to heritage assets means that these issues need to be considered on an asset-specific basis, as it is possible that in some cases, the presence of existing WTGs would make heritage assets more sensitive to change. These issues are discussed on a receptor-specific basis in section 7.12.
- 7.9.6 The English Channel and the Thames approaches have long been busy shipping lanes, and many of the heritage assets along the coast have a direct relationship with that shipping, such as the lighthouses at North and South Foreland, or harbour buildings at Ramsgate, Broadstairs and Margate. There is a reasonable expectation that a viewer would see numerous anthropogenic features in views out to sea from these assets. However, there is a qualitative difference between changing views of shipping and the more static views to the proposed Thanet Extension WTGs. Similarly, the associations between shipping and communities along the coast will differ from those between the same communities and electrical generation. Again, in some cases, these relationships may lessen the magnitude of change, in others they may serve to exacerbate that change. These issues are discussed on a receptor specific basis in section 7.12.
- 7.9.7 Visibility in views out to sea is variable and frequently very limited as a result of mist and fog, and the low-lying haze over the shipping lanes. All assessments have been undertaken considering the absolute worst-case (i.e. maximum visibility of WTGs under ideal weather conditions). The distances of many heritage assets from the proposed WTGs is such that weather conditions have a substantial bearing on the likely visual prominence of Thanet Extension, which will increase with separation from the proposed development. These issues are discussed on a receptor specific basis in section 7.12.
- 7.9.8 The scope of assessment for onshore heritage assets has been formulated and designed in consultation with Historic England, Kent County Council (KCC), Thanet District Council (TDC) and Dover District Council (DCC), as set out in Volume 5, Annexes 7-2, Criteria for Selection of Onshore Heritage Assets to be Assessed (Document Ref: 6.5.7.2) and 7-3, Scope of assessment of effects arising through change to setting of onshore heritage assets (Document Ref: 6.5.7.3). This was formulated using a number of criteria and designed to ensure that assessment of assets was concise and relevant. Initial viewpoint photography to support the PEIR was also agreed at this stage. No further request for visualisations to support the historic environment assessment within the ES was received during the Section 42 consultation process although additional wirelines from the Essex coast have been added. The assets have been referenced within the text with their appropriate prefix for ease of identification. Conservation areas have been referenced with their full names.
- 7.9.9 Initial settings surveys were carried out during the week commencing 15th May 2017. These surveys aimed to provide further information on the scope of assessment and refine or add to it as necessary.
- 7.9.10 Table 7.8 provides details of these assets, the observations of the site visits and the rationale for exclusion, refinement or additional inclusion. Where the site survey identified changes to the agreed scope, whether from identifying heritage assets that needed to be assessed further or which could be excluded from the scope, these are identified within Table 7.8. All designated heritage assets considered within the assessment are shown on Figure 7.. This table does not discuss elements from the scope of assessment report (Volume 5, Annex 7-3, Scope of assessment of effects arising through change to setting of onshore heritage assets (Document Ref: 6.5.7.3) that remain unchanged. Further clarification of the refined scope is provided within Table 7.9, which sets out which of the listed buildings within each conservation area are included within their assessment. These are also illustrated within Figure 7.2. The initial setting survey and subsequent scope refinement considered the design changes of each element of Thanet Extension since the production of the original EIA Report to Inform Scoping (VWPL, 2016).

**Table 7.8: Refinement of initial indirect effects scope of assessment**

Heritage Asset	Preliminary Site Visit Observations	Considered in Further Assessment
Walmer Seafront Conservation Area	The existing Thanet Offshore Wind Farm (TOWF) can be seen as a distant feature from the eastern extents of the conservation area, but not in views of or from the individual listed buildings in the conservation area, which would be screened from Thanet Extension by intervening buildings. Given the lack of impact upon the listed buildings contained within the conservation area and the limited visibility from within the designated area it is considered that Thanet Extension would have limited potential for harm upon the conservation area. The most sensitive location appears at the north-eastern extent of the designated area where WTGs may appear on the periphery of views towards the Deal Middle Street Conservation Area and associated scheduled Deal Castle (NHLE 1013380).	Adverse effects on Walmer Seafront Conservation Area arising from visibility of the proposed Thanet Extension WTGs will be assessed, although individual listed buildings within the conservation area will not be affected and will consequently not be assessed further. It is not anticipated that there would be sufficient visibility of the proposed substation or export cable to give rise to any adverse effects.
Deal Middle Street Conservation Area and associated listed buildings and scheduled Artillery Castle (NHLE 1013380)	There are 291 listed buildings within the Deal Middle Street Conservation Area of which 288 are Grade II and three are Grade II* listed. The survey noted that the majority of these are set back from the coast, screened from Thanet Extension by further structures or have views looking out directly east rather than towards Thanet Extension. At the distances involved, oblique views to Thanet Extension in the periphery of views out from the conservation area would not present any harm to heritage significance. The initial survey of these assets suggested that Thanet Extension will be visible from the bastions of Deal Castle (NHLE 1013380) and from the eastern edges of the conservation area, although the pier and the Royal Hotel largely screen these views from other parts of the southern extent of the conservation area. The majority of the Deal Middle Street Conservation Area will not be affected by Thanet Extension to anything more than a negligible level. However, more sensitive locations such as Deal Castle (NHLE 1013380) and the northern seafront of the conservation area, particularly Beach Street, will require further consideration. The buildings that are considered to be at risk of indirect effects comprise structures along the front, predominantly houses with bay windows along the northern half of Beach Street.	The Deal Middle Street Conservation Area, Artillery Castle (NHLE 1013380) and the listed buildings identified within Table 7.9 may be affected by visibility of the proposed Thanet Extension WTGs and will be assessed further. It is not anticipated that there would be sufficient visibility of the proposed substation or export cable to give rise to any adverse effects. The proposed WTGs would not be visible in views of or from other listed buildings within the conservation area, which will not be affected and will consequently not be assessed further.
Grade II Listed Buildings at Sandwich Bay Estate (NHLE 1247851, 1247859, 1263914, 1263915 and 1263942)	This group of buildings consists of five separate structures. Restharrow (NHLE 1247851), a two-storey house with attic c. 1912, roughcast and brown brick, with plain tiled roof. Fairway (NHLE 1247859), early-20th century Queen Anne style house of red brick and plain tiled roof. Wickhurst (NHLE 1263914), early-20th century two-storey Cape Dutch style house with painted brick and grey pantile roof. Kentlands and The Lodge (NHLE 1263915), two story house of red brick, timber frame and plaster infill. Sandilands and The Backs (NHLE 1263942), c. 1930 two-storey house with attic in red brick in English Bond with plain tiled roof. These assets are all within an estate that is accessed by toll roads and private roads along the sea front, providing a sense of exclusivity and detachment from the wider area. The survey demonstrated that the majority of these assets do not have designed views out in the direction of Thanet Extension with the exception of Kentlands and The Lodge (NHLE 1263915). Thanet Extension WTGs are also unlikely to appear in views of these assets except as distant features on the periphery of the view. Longer views out towards the proposed substation from Sandwich Bay do not contribute to the heritage significance of these assets and due to the scale of this structure it would not be clearly visible from these locations. Kentlands and The Lodge (NHLE 1263915) have views that could take in Thanet Extension and have been considered in more detail at section 7.12.	Kentlands and The Lodge (NHLE 1263915) may be affected by visibility of the proposed Thanet Extension WTGs and will be assessed further. It is not anticipated that there would be sufficient visibility of the proposed substation or export cable to give rise to any adverse effects. Elements of Thanet Extension would not be visible in views of or from other listed buildings at Sandwich Bay, which will not be affected and will consequently not be assessed further.

Heritage Asset	Preliminary Site Visit Observations	Considered in Further Assessment
Boarded Groin (HER MKE76084/ TR 36 SW 203)	This asset was not included within the Amec Foster Wheeler scope of assessment of effects arising through change to setting on onshore heritage (Volume 5, Annex 7-2, Criteria for Selection of Onshore Heritage Assets to be Assessed (Document Ref: 6.5.7.2)) as it was considered that the proposed construction works and substation would be screened from surviving elements of the asset. The relocation of the substation to Richborough Port and amendments to the proposals for cabling subsequent to the issue of this document raised the potential for indirect effects to occur on this heritage asset and as such it has now been considered for further assessment.	This asset has been included within the scope for indirect effects due to the relocation of the substation and potential visibility of the export cable works. It is not anticipated that there would be sufficient visibility of the proposed Thanet Extension WTGs to give rise to any adverse effects.
Ramsgate Conservation Area	There are 332 listed buildings within the Ramsgate Conservation Area of which four are Grade I listed, five are Grade II* listed and 323 are Grade II listed. Views of the sea make a valuable contribution to the heritage significance of the Ramsgate Conservation Area as a whole and especially for the historic buildings located along the southern and eastern extent of the designated area. The survey noted that the majority of the listed buildings are either set back from the coast and/ or screened from Thanet Extension by further structures or do not have views looking towards Thanet Extension. These assets would consequently not be affected by Thanet Extension. The exceptions to this are the listed buildings, predominantly located around the harbour, sea front and at the northern extent of the designated area. Longer views out toward the proposed substation did not contribute to the experience, understanding or heritage significance of the Ramsgate Conservation Area or the buildings contained therein.	The Ramsgate Conservation Area and the selected listed buildings provided within Table 7.9 will be assessed further in respect of change to setting arising from visibility of the proposed Thanet Extension WTGs. Other listed buildings would not be affected and no further assessment of the other listed buildings or the substation will occur due to the lack of heritage significance being derived from views including the proposed Thanet Extension WTGs. It is not anticipated that there would be sufficient visibility of the proposed substation or export cable to give rise to any adverse effects.
Broadstairs Conservation Area	There are 64 listed buildings within the Broadstairs Conservation Area all of which are Grade II listed. The survey noted that the majority of the listed buildings are either set back from the coast and/ or screened from Thanet Extension by further structures and as such will not be affected by Thanet Extension. The buildings that were considered to be at risk of indirect effects are predominantly located along the Victoria Parade, Albion Street and Harbour Street.	The Broadstairs Conservation Area and selected listed buildings identified within Table 7.9 will be assessed further in respect of change to setting arising from visibility of the proposed Thanet Extension WTGs. It is not anticipated that there would be sufficient visibility of the proposed substation or export cable to give rise to any adverse effects. Elements of Thanet Extension will not appear views of or from the other listed buildings within the conservation area, which would not be affected and no further assessment of these listed buildings will be undertaken.
Kingsgate Conservation Area	This conservation area has a feeling of exclusion and division due to the limited public access within it. The structures along the coastline are noted for their views out to sea and to other associated structures in which Thanet Extension WTGs may be visible. The survey noted that the Historic England entry for the Remains of Neptune's Temple (NHLE 1239838) appeared to be incorrect and is in fact located outside of the conservation area on the headland opposite Kingsgate Castle (NHLE 1239636). This corrected location was later confirmed with Amanda Kearsy of Historic England.	The Kingsgate Conservation Area and selected listed buildings provided within Table 7.9 will be assessed further, including the Remains of Neptune's Temple (NHLE 1239838). The former Port Regis School (NHLE 1239262) and associated listed buildings will also be assessed further. Elements of Thanet Extension will not appear views of or from the other listed buildings which would not be affected by the proposed development and will not be assessed further.

Heritage Asset	Preliminary Site Visit Observations	Considered in Further Assessment
Margate Conservation Area	There are 192 listed buildings within the Margate Conservation Area comprising one Grade I, three Grade II* and 188 Grade II listed buildings. Aspects of the setting that provide an important contribution to the listed buildings' and conservation area's heritage significance include the relationship between the individual listed buildings and further buildings within the conservation area together with the dynamism, activity and promotion of the area. The majority of the listed buildings were either set back from the coast and/ or screened from Thanet Extension by further structures or did not have views looking towards the proposed development. The exceptions to this are the predominantly located within the eastern extent of the conservation area with the exception of the Former 'Man Of Kent' Temperance Hotel (NHLE 1395803) which is located inland but on higher ground and with extended views due to its height.	The Margate Conservation Area and selected listed buildings set out at Table 7.9 will be assessed further. Elements of Thanet Extension will not appear views of or from the other listed buildings within the Conservation Area, which would not be affected and no further assessment will occur.
Margate Seafront Conservation Area	The Margate Seafront Conservation Area has an open feel with views focused along the seafront and out towards the sea. It contains one Grade II* listed building and eight Grade II listed structures. Aspects of the setting that provide an important contribution to the listed buildings and conservation areas heritage significance include the relationship between the individual listed buildings and further buildings within the conservation area and the open areas along the coast together with the dynamism, activity and promotion of the area. The majority of this conservation area was screened from Thanet Extension WTGs by buildings contained within the Margate conservation area. It seemed unlikely that views of WTGs would be available from the listed buildings contained within this area and would only be possible from the western extent of the conservation area in Westbrook Bay.	No visibility of the proposed Thanet Extension WTGs is anticipated from within the Margate Seafront Conservation Area. There may be some visibility of the proposed WTGs in sequential views of the conservation area from the west, and the effects on the conservation area have been assessed further. No further assessment of individual heritage assets within the Margate Seafront Conservation Area will be undertaken.
Westgate-on-Sea Conservation Area	Six Grade II listed buildings are contained within the designated area. Aspects of the setting that provide an important contribution to the listed buildings' and conservation area's heritage significance include the relationship between the individual listed buildings and further buildings within the conservation area together with the views out and across the coastline. The majority of the conservation area was screened from Thanet Extension WTGs by further buildings both within Westgate-on-Sea and by Margate. Visibility would be possible from the coastal location which does include the Grade II listed Westgate-on-Sea British Legion War Memorial (NHLE 1443700).	The Westgate-on-Sea Conservation Area and selected listed buildings identified in Table 7.9 will be assessed further. No further assessment of the other listed buildings will occur because elements of Thanet Extension would not be visible in views of or from these heritage assets.



**Table 7.9: Listed buildings to be included within the conservation area assessments (Figure 7.)**

NHLE Reference	Grade	Name	Eastings	Northings
<b>Broadstairs Conservation Area</b>				
1222614	II	The Prospect	639822	167869
1223076	II	Albion House	639740	167766
1223078	II	5 and 6, Victoria Parade	639722	167734
1238365	II	16 and 18, Albion Street	639772	167807
1238368	II	Barfield House	639798	167861
1239144	II	14, Albion Street	639764	167799
1239179	II	24, Albion Street	639780	167827
1239273	II	2 and 2a, Eldon Place	639829	167877
1239475	II	1, Eldon Place	639826	167874
1239489	II	Cliff Edge	639830	167882
1239493	II	Bleak House	639934	167939
1239497	II	Flint House	639867	167906
1239626	II	The Look Out House and Stores, The Pier	639964	167868
1239627	II	"Broadstairs Entertainment Department Office York Gate House"	639884	167874
1267334	II	K6 Telephone Kiosk Outside Harbour Office	639957	167870
1267440	II	Arcadia House	639736	167751
1267443	II	Littlewold	639734	167746
1267465	II	Dickens House	639738	167757
1267577	II	9, The Parade	639820	167863
1273607	II	Windsor Cinema	639858	167872

NHLE Reference	Grade	Name	Eastings	Northings
1273632	II	Archway House	639874	167920
1273644	II	The York Gate	639889	167877
1273645	II	The Tartar Frigate Public House	639934	167888
1273646	II	Admiralty Cottage	639929	167868
1273826	II	20, Albion Street	639775	167817
1274203	II	26, Albion Street	639782	167831
1274241	II	Royal Albion Hotel	639755	167796
1274242	II	22, Albion Street	639778	167823
<b>Clifftop Conservation Area</b>				
1392729	II	Remains of The Clifton Baths at Cliftonville Lido	635929	171372
1421296	II	Walpole Bay Tidal Pool	636926	171494
1422305	II	Cliff Lift	636729	171392
<b>Deal Conservation Area</b>				
1069756	II	K6 Telephone Kiosk	637812	152617
1069877	II	Adelaide House	637775	152976
1069880	II	Bruce House	637776	153014
1069881	II	135, Beach Street	637777	153027
1069882	II	Fairhaven	637774	153033
1069885	II	Central House	637771	153078
1069891	II	187, Beach Street	637765	153245
1069892	II	191, Beach Street	637770	153257
1069893	II	Seamark House	637771	153288

NHLE Reference	Grade	Name	Eastings	Northings
1069907	II	Timeball Tower	637801	152476
1069917	II	Star and Garter Hotel	637770	152908
1069918	II	109, Beach Street	637764	152936
1250376	II	White Horses	637770	152928
1250721	II	159, Beach Street	637776	153111
1250740	II	Royal Echange	637769	153236
1250763	II	Forres House	637771	153263
1263093	II	The Scarborough Cat	637770	153291
1263121	II	189, Beach Street	637770	153249
1363411	II	Stanford House	637772	152918
1363429	II	111, Beach Street	637774	152942
1363430	II	117, Beach Street	637772	152953
1363431	II	123, Beach Street	637777	152982
1363433	II	The Pelican	637770	153092
1363436	II	185, Beach Street	637765	153239
1363438	II	Royal Hotel	637792	152869
Kingsgate Conservation Area				
1239636	II	Kingsgate Castle	639693	170536
1239637	II	Captain Digby Inn	639504	170692
1239838	II	Arx Ruohim Remains of Neptune's Temple (outside of Conservation Area).	639527	170957
1273558	II	Remains of Lookout in grounds of Castle Keep Hotel	639794	170491
1273614	II	Holland End, Holland House, Little Holland	639552	170568

NHLE Reference	Grade	Name	Eastings	Northings
		House		
1239262	II	Port Regis School	639452	170279
1239439	II	King's Gate in the Grounds of Port Regis School	639516	170302
1239264	II	Hackemdown Tower, Convent Road	639545	170282
Margate Conservation Area				
1088959	II	12 - 32, Fort Crescent	635685	171265
1088960	II	33 - 36, Fort Crescent	635770	171278
1088962	II	Paragon Court	635819	171348
1260334	II	Stone Pier	635245	171233
1341533	II	1 - 8, Fort Crescent	635580	171281
1392274	II	14 & 15, Cliff Terrace	635912	171341
1395803	II	Former 'Man of Kent' Temperance Hotel	635441	170446
Ramsgate Conservation Area				
1038294	II	The West Pier, Bollards, Iron Crane and Fairleads	638262	164349
1085418	II	Albion House	638560	164874
1086071	II	"Granville Terrace, St Clu Hotel"	638924	165316
1086073	II	East Court	639037	165459
1086074	II	Rock Garden about 30 m east of Sunshelter	639198	165636
1086088	II	East Pier, No 1 Slipway, Bollards and Victoria or Dover Stairs	638572	164707
1086089	II	Lighthouse on West Pier	638461	164290
1086090	II	The Obelisk	638575	164756

NHLE Reference	Grade	Name	Eastings	Northings
1096005	II	Eastcliff Bandstand including Attached Dance Floor, Steps and Boundary Wall with Railing	638651	164964
1203535	II	"Granville House, The Granville"	638797	165183
1203551	II	Coastguard Cottages	638969	165404
1203557	II	Coastguard Cottages	638931	165361
1203661	II	Bench and Platform About 50 m east of Sunshelter	639204	165636
1281609	II	Fountains Pool About 50 m west of Sunshelter and Rock Gardens	639174	165587
1281639	II	Pair of Stone Lions About 100 m south-west of St Clu Hotel	638911	165264
1336316	II	Memorial Bust and Railings to E W Pugin, About 50 m south of The Granville Hotel	638816	165151
1336318	II	Sun Shelter and Rock Gardens, Winterstoke Gardens	639182	165581
1336319	II	Rock Gardens and Cliff Stairs about 30 m south of Sunshelter	639194	165545
1336324	II*	Harbour Cross Wall, Sluices, Bollards, Dry Dock, Basin Gates, Wing Wall and Dundee Steps	638332	164605
1336325	II*	The Clock House	638507	164715
1336672	II	Royal Victoria Pavillion	638613	164770
1376681	II	Powder Magazine and Walls at south-west end of Cross Wall	638193	164443
1391165	II	Granville Marina	638859	165149
Westgate-on-Sea Conservation Area				
1443700	II	Westgate-on-Sea British Legion War	632321	170422

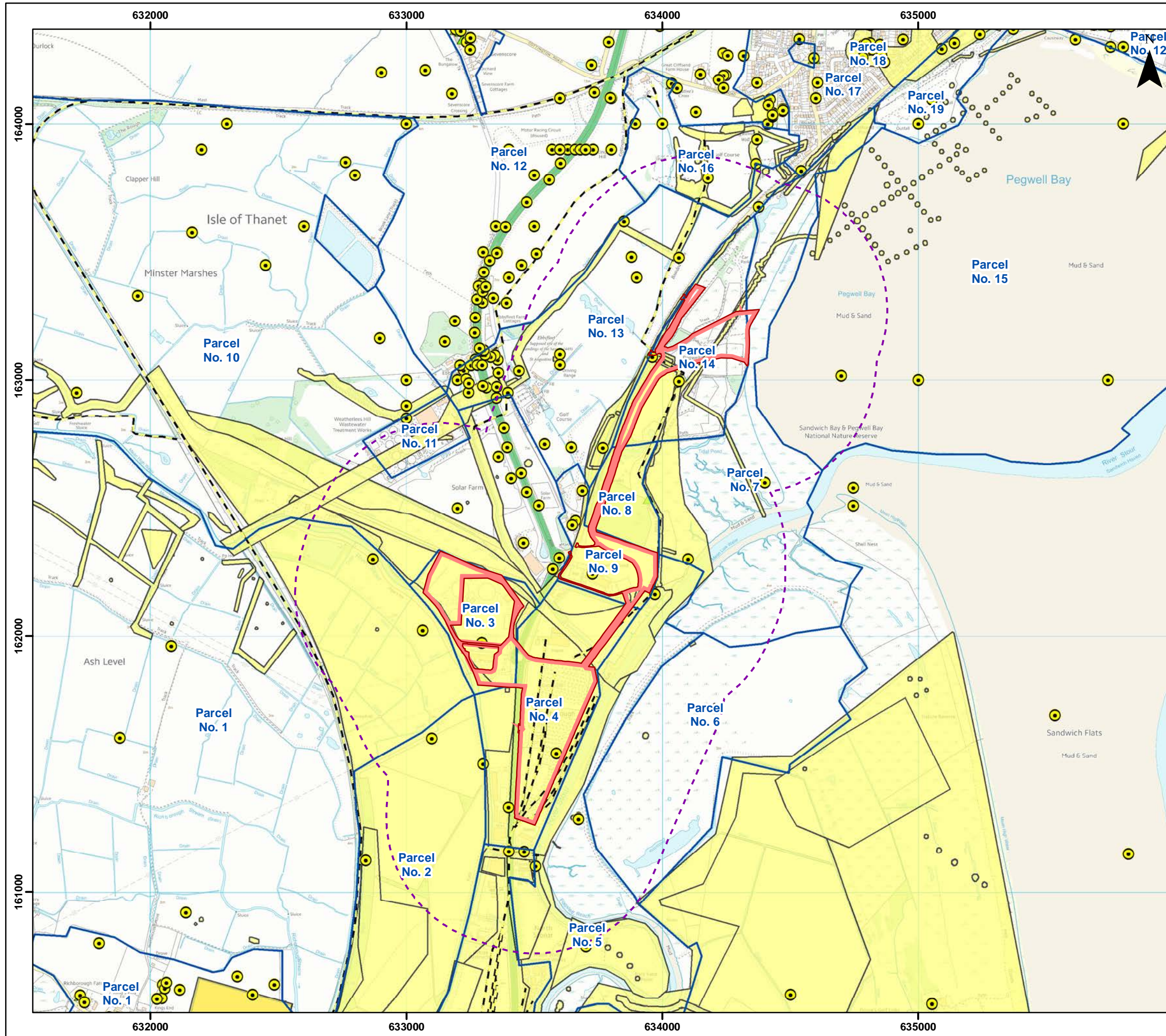
NHLE Reference	Grade	Name	Eastings	Northings
		Memorial		

7.9.11 The refinement of scope for further assessment of indirect effects, as explained in Table 7.8 is set out within Table 7.10. The buildings or assets listed in Table 7.9 are considered in relation to their group value within the Conservation Areas, and form part of the overall assessments for each area, except where specifically mentioned, or selected for individual assessment as shown in Table 7.10 below. The further assessment will incorporate Step 2 (Assess contribution of setting to heritage significance) of the staged approach to proportionate decision-making as set out by Historic England (Historic England, 2015) together with a preliminary Step 3 assessment of the potential effects of the proposed development, these are both provided in section 7.12. The significance, as set out in Table 7.3 for each element of the refined scope is also provided. The assets included within the refined scope for indirect effects are illustrated within Figure 7. and listed within Table 7.8 by designation in alphabetical order and the assets are discussed in this order within section 7.12.

**Table 7.10: Scope of indirect effects assessment for onshore heritage assets (Figure 7.)**

Name	Eastings	Northings
<b>Designated Assets</b>		
Broadstairs Conservation Area and Selected Listed Buildings	639769	167756
Church of St Peter (Grade I Listed, NHLE 1343813)	633074	158165
Clifftop Conservation Area and Selected Listed Buildings	636578	171343
Deal Middle Street Conservation Area, Artillery Castle (scheduled monument, NHLE 1013380) and Selected Listed Buildings	637737	152713
Dover Patrol Monument (War Memorial) and associated Railed Surround, Steps and Concrete Posts (Grade II* Listed, NHLE 1070067)	637331	145207
Kentlands and The Lodge (Grade II Listed, NHLE 1263915)	636316	157689
Kingsgate Conservation Area and Selected Listed Buildings Remains of Neptune's Temple (NHLE 1239838)	639549	170383
Margate Conservation Area and Selected Listed Buildings	635497	170908
North Foreland Lighthouse Including Attached Lighthouse Keepers Houses (Grade II Listed, NHLE 1222802)	639859	169619
Pegwell Bay WWII Invasion Defences (Grade II Listed, NHLE 1413803)	633949	162539
Ramsgate Conservation Area and Selected Listed Buildings	638270	164820
Reculver Saxon Shore Fort, Anglo-Saxon Monastery and Associated Remains (scheduled monument, NHLE 1018784)	622788	169285
Richborough Castle (Grade I Listed, NHLE 1363256), Saxon Shore Fort, Roman Port and Associated Remains (scheduled monument, NHLE 1014642)	632455	160185
Sandown Castle (scheduled monument, NHLE 1005147)	637587	154306
Seven Stones House (Grade II Listed, NHLE 1390592)	639462	166340
South Foreland Lighthouse (Grade II Listed, NHLE 1101512)	635911	143305
Walmer Artillery Castle (scheduled monument, NHLE 1013381)	637761	150096

Name	Eastings	Northings
Walmer Seafront Conservation Area	637753	151497
Westgate-on-Sea Conservation Area and Grade II Listed Westgate-on-Sea British Legion War Memorial (NHLE 1443700)	632262	170179
<b>Non-Designated Assets</b>		
Boarded Groin (HER MKE76084/ TR 36 SW 203)	634031	162913



# THANET EXTENSION OFFSHORE WIND FARM

## Figure 7.1 - Overview Heritage Assets Potentially Subject to Direct Effects

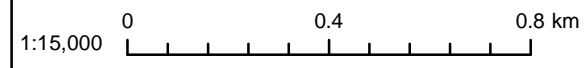
- Legend**
- Onshore Red Line Boundary
  - 500m buffer from onshore red line boundary
  - ▲ Listed building - Grade II
  - Non-designated heritage asset point
  - Non-designated heritage asset line
  - Non-designated heritage asset area
  - Scheduled monument
  - Assessment parcel

Datum: OSGB 1936  
Projection: BNG

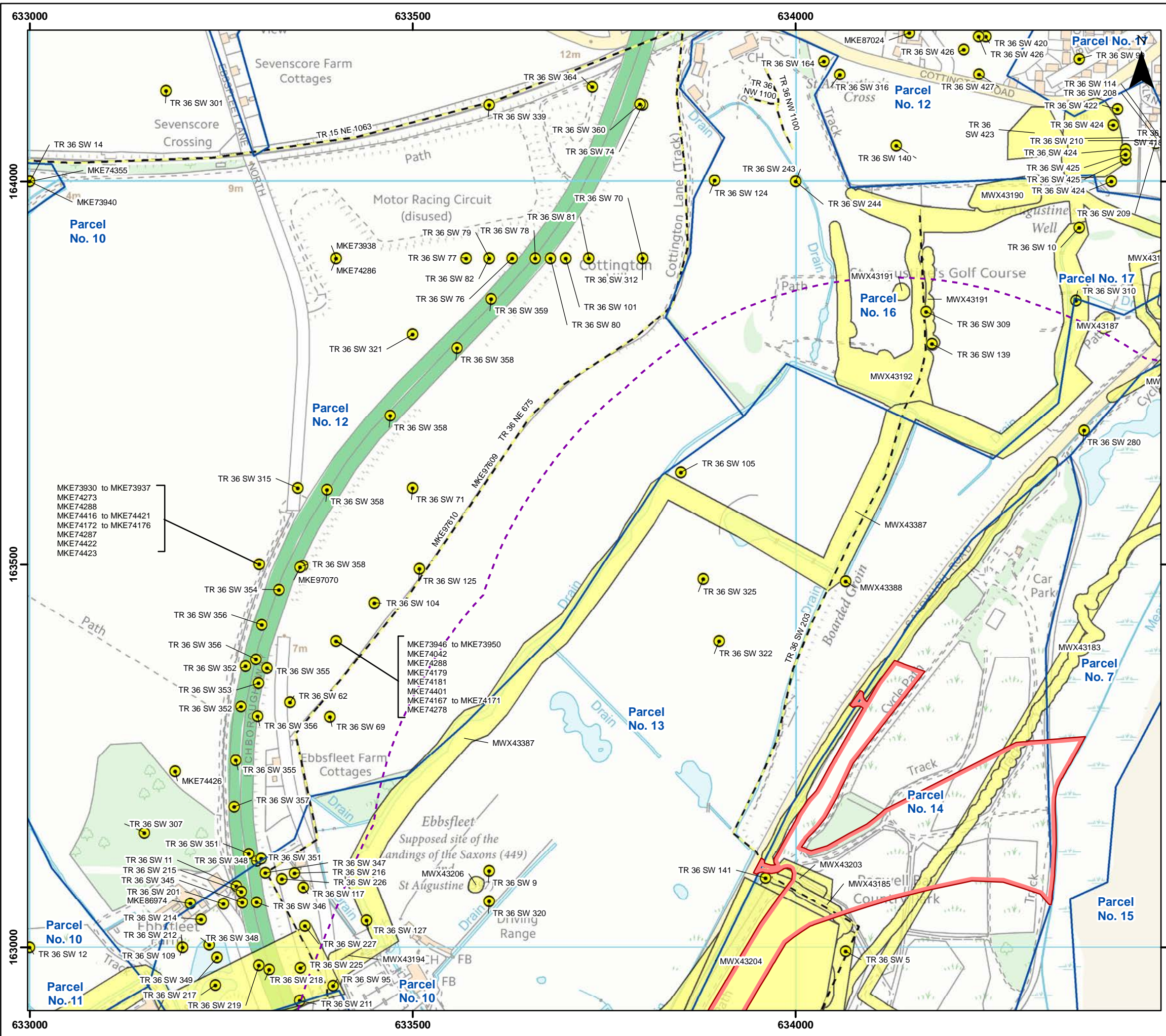


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Drg No	39080-Lon145a			<b>Figure 7.1</b>
Rev	1.0	Date	02/05/2018	
By	JP	Layout	N/A	



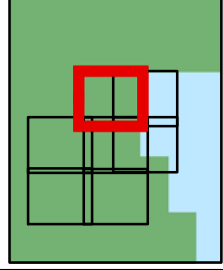
# THANET EXTENSION OFFSHORE WIND FARM

## Figure 7.1a Heritage Assets Potentially Subject to Direct Effects

**Legend**

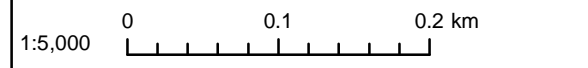
- Onshore Red Line Boundary
- 500m buffer from onshore development area
- Non-designated heritage asset point
- Non-designated heritage asset line
- Non-designated heritage asset area
- Assessment parcel

Datum: OSGB 1936  
Projection: BNG



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Drg No	39080-Lon146a			<b>Figure 7.1a</b>
Rev	1.0	Date	02/05/2018	
By	JP	Layout	N/A	

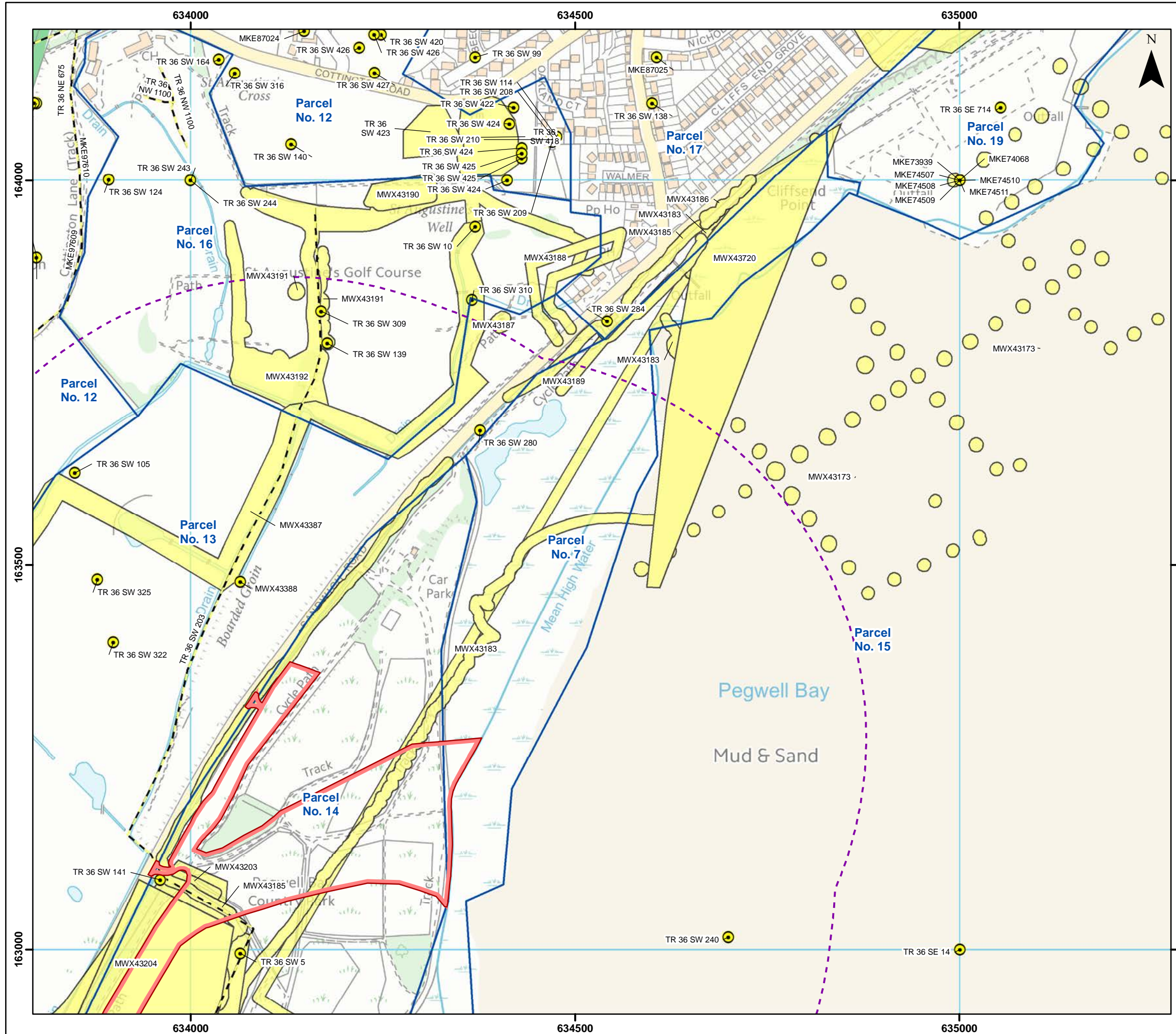


# THANET EXTENSION OFFSHORE WIND FARM

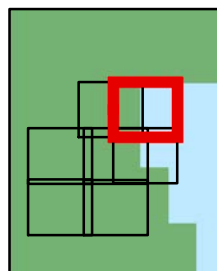
## Figure 7.1b Heritage Assets Potentially Subject to Direct Effects

### Legend

- Onshore Red Line Boundary
- 500m buffer from onshore development area
- Non-designated heritage asset point
- Non-designated heritage asset line
- Non-designated heritage asset area
- Assessment parcel

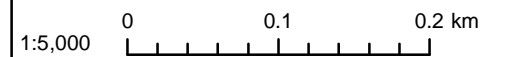


Datum: OSGB 1936  
Projection: BNG



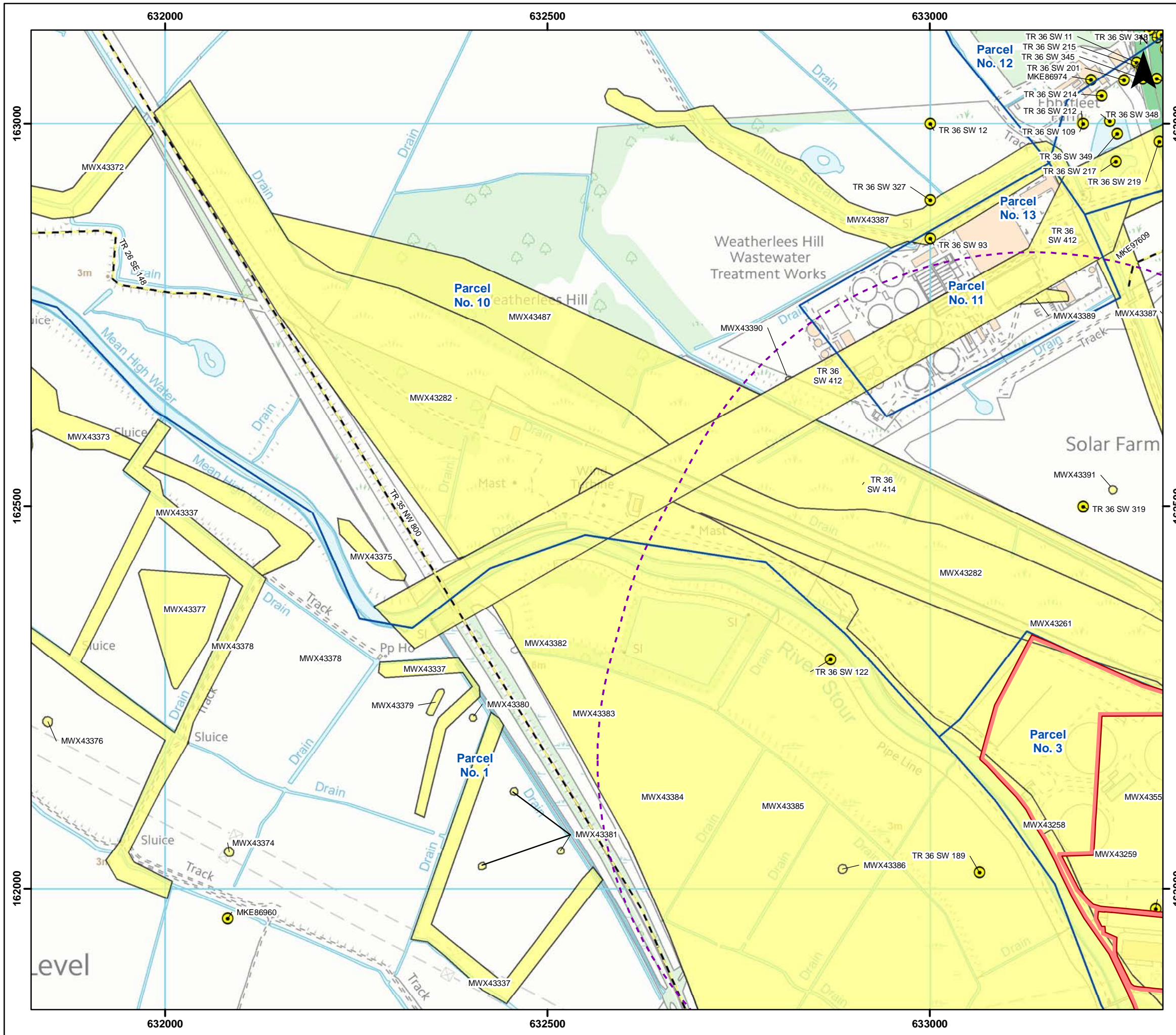
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Rev	1.0	Date	02/05/2018
By	JP	Layout	N/A

**Figure 7.1b**

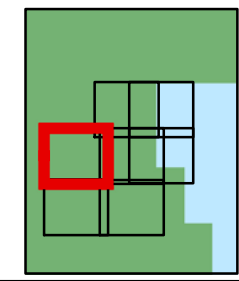


## Figure 7.1c

### Heritage Assets Potentially Subject to Direct Effects

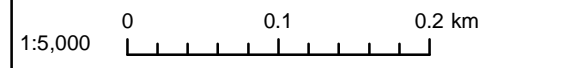
- Legend**
- Onshore Red Line Boundary
  - 500m buffer from onshore development area
  - Non-designated heritage asset point
  - Non-designated heritage asset line
  - Non-designated heritage asset area
  - Assessment parcel

Datum: OSGB 1936  
 Projection: BNG



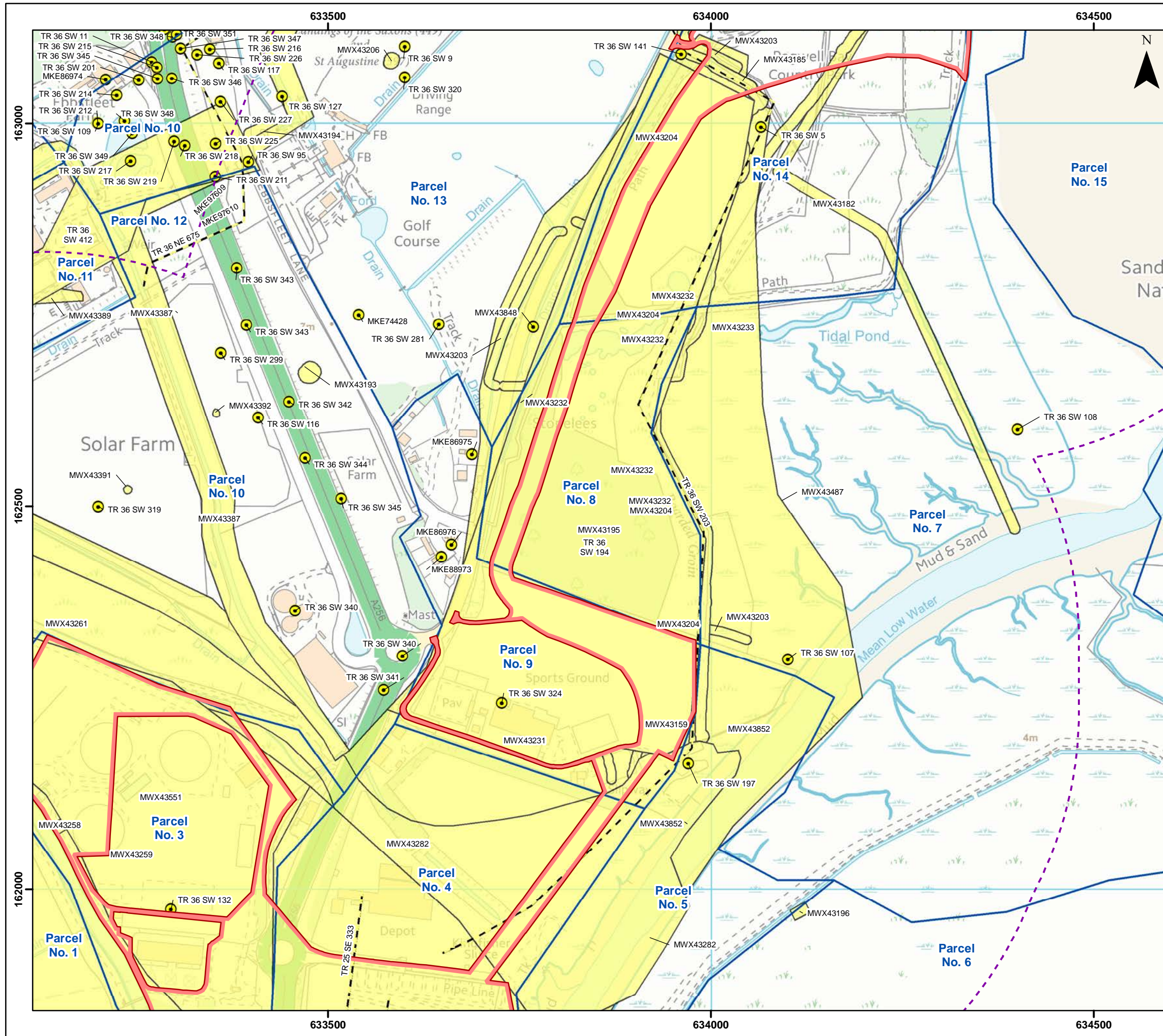
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By	JP	Layout	N/A	





## Figure 7.1d

### Heritage Assets Potentially Subject to Direct Effects

**Legend**

- Onshore Red Line Boundary
- 500m buffer from onshore development area
- Non-designated heritage asset point
- Non-designated heritage asset line
- Non-designated heritage asset area
- Assessment parcel

Datum: OSGB 1936  
Projection: BNG

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1:5,000 0 0.1 0.2 km

Drg No	39080-Lon146a			<b>Figure 7.1d</b>
Rev	1.0	Date	02/05/2018	
By	JP	Layout	N/A	

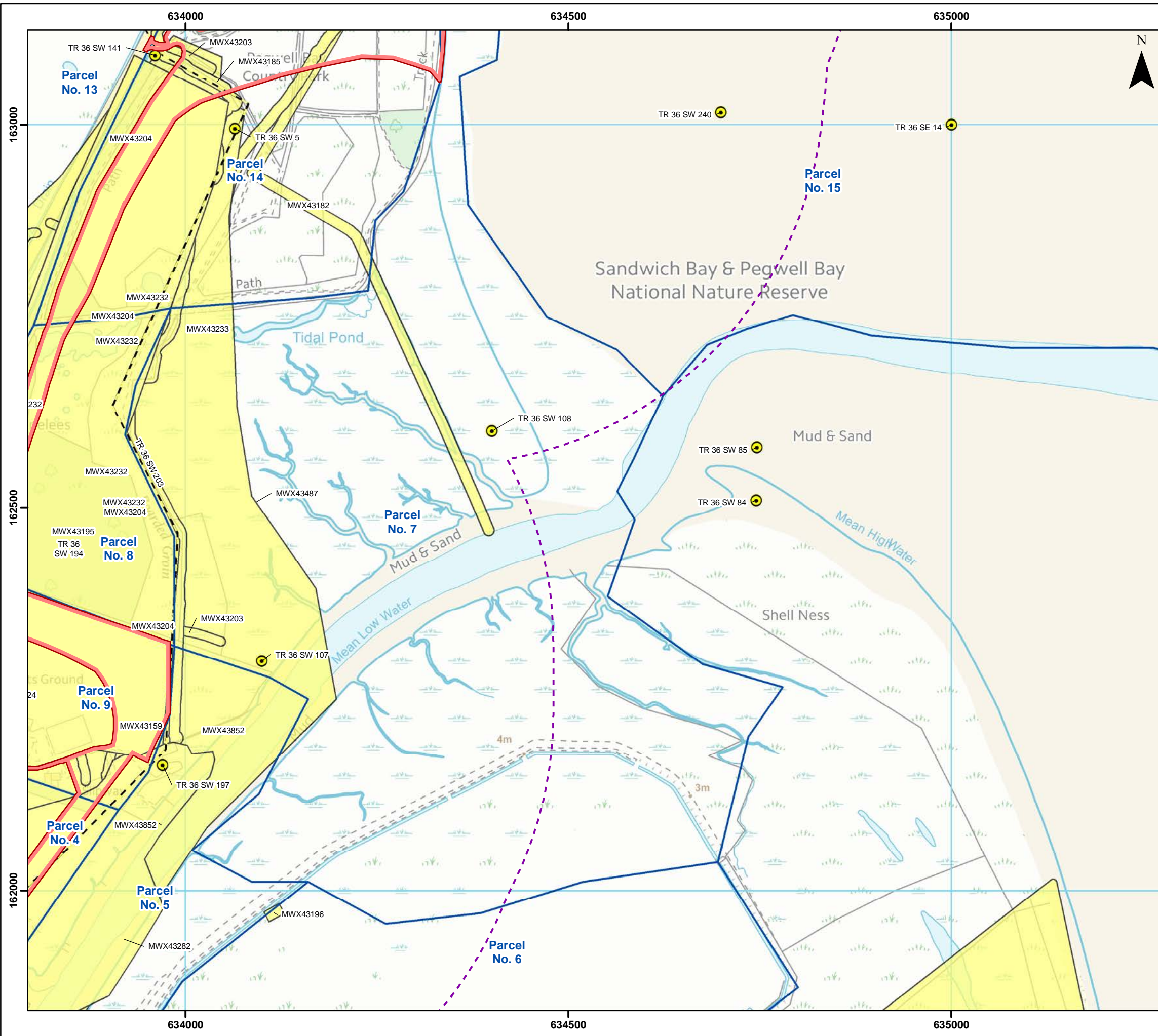


# THANET EXTENSION OFFSHORE WIND FARM

## Figure 7.1e Heritage Assets Potentially Subject to Direct Effects

### Legend

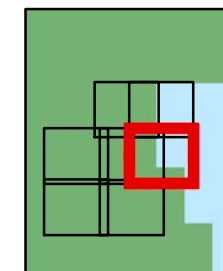
- Onshore Red Line Boundary
- 500m buffer from onshore development area
- Non-designated heritage asset point
- Non-designated heritage asset line
- Non-designated heritage asset area
- Assessment parcel



162500

162000

Datum: OSGB 1936  
Projection: BNG



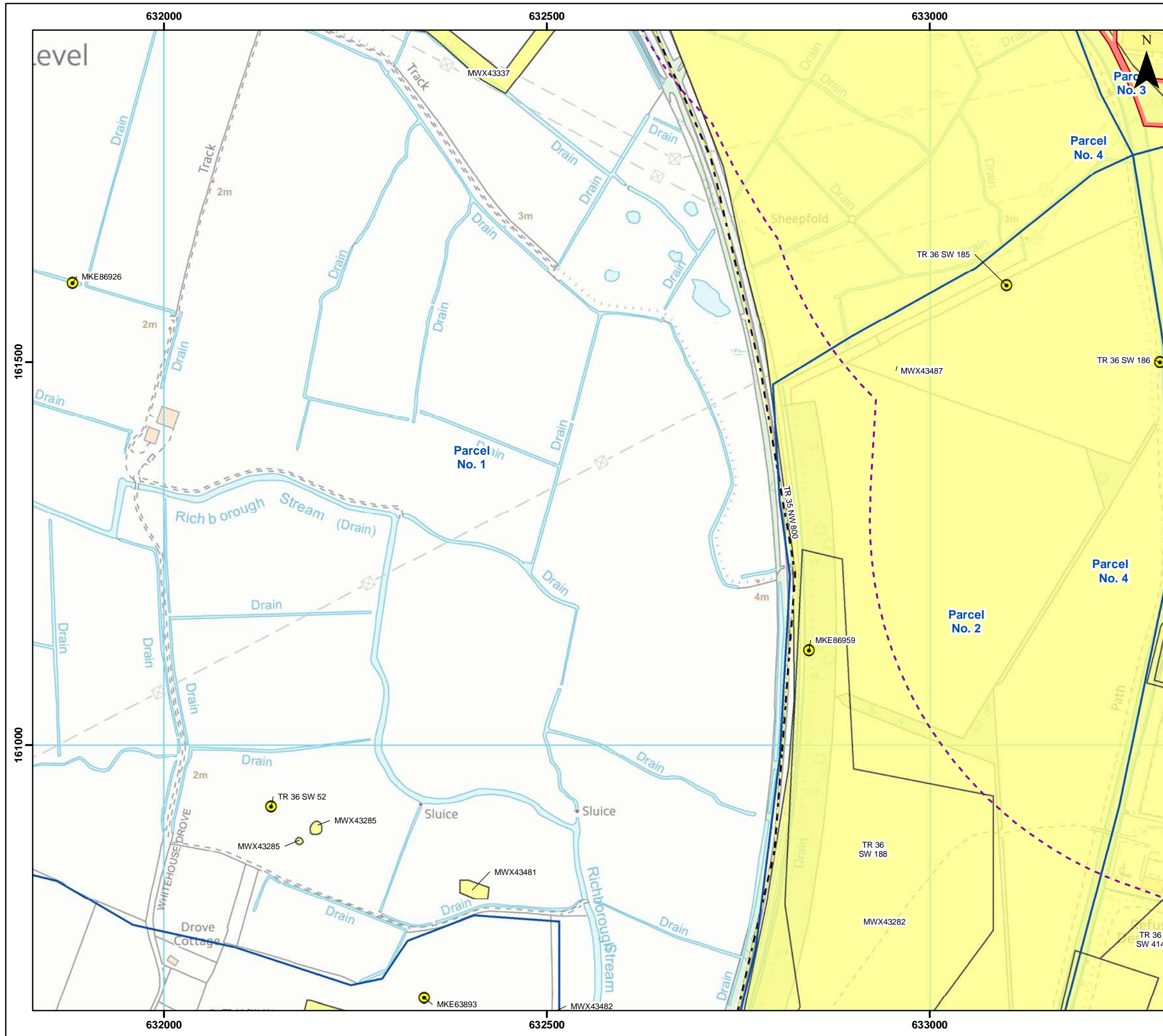
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1:5,000 0 0.1 0.2 km

Drg No	39080-Lon146a		
Rev	1.0	Date	02/05/2018
By	JP	Layout	N/A

### Figure 7.1e



**Figure 7.1f**  
 Heritage Assets Potentially Subject to Direct Effects

- Legend**
- Onshore Red Line Boundary
  - 500m buffer from onshore development area
  - Non-designated heritage asset point
  - Non-designated heritage asset line
  - Non-designated heritage asset area
  - Assessment parcel

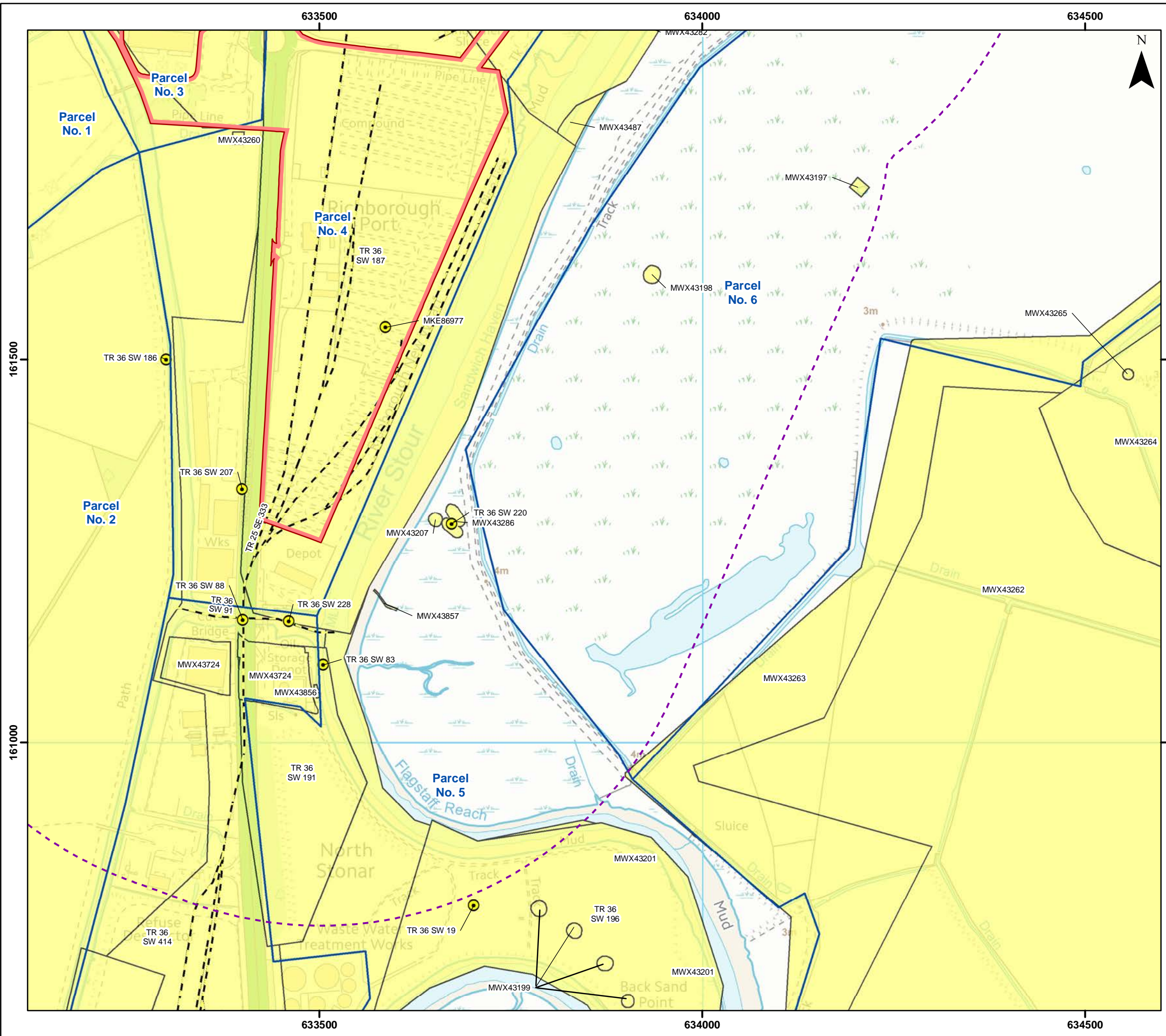
Datum: OSGB 1936  
 Projection: BNG

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1:5,000 0 0.1 0.2 km

Drg No	39080-Lon146a			<b>Figure 7.1f</b>
Rev	1.0	Date	02/05/2018	
By	JP	Layout	N/A	

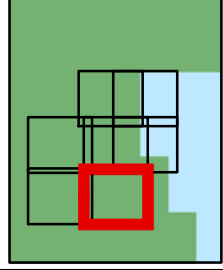


# THANET EXTENSION OFFSHORE WIND FARM

## Figure 7.1g Heritage Assets Potentially Subject to Direct Effects

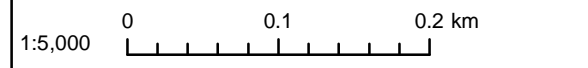
- Legend**
- Onshore Red Line Boundary
  - 500m buffer from onshore development area
  - Non-designated heritage asset point
  - Non-designated heritage asset line
  - Non-designated heritage asset area
  - Assessment parcel

Datum: OSGB 1936  
 Projection: BNG



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Drw No	39080-Lon146a			<b>Figure 7.1g</b>
Rev	1.0	Date	02/05/2018	
By	JP	Layout	N/A	



## Figure 7.2 - Overview Heritage Assets Potentially Subject to Indirect Effects

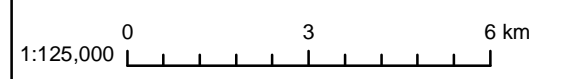
**Legend**

- Onshore Red Line Boundary
- ★ Scheduled monument
- ▲ Listed building - Grade I
- ▲ Listed building - Grade II\*
- ▲ Listed building - Grade II
- Non-designated heritage asset
- Conservation area

Datum: OSGB 1936  
Projection: BNG

Notes  
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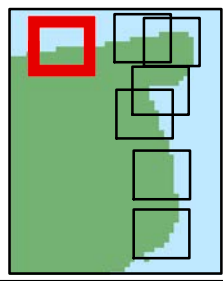
Drq No	39080-Lon147a			<b>Figure 7.2</b>
Rev	1.0	Date	02/05/2018	
By	JP	Layout	N/A	



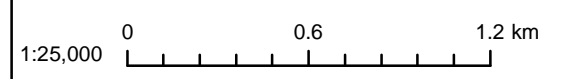
**Figure 7.2a**  
Heritage Assets Potentially Subject to Indirect Effects

**Legend**  
 Scheduled monument

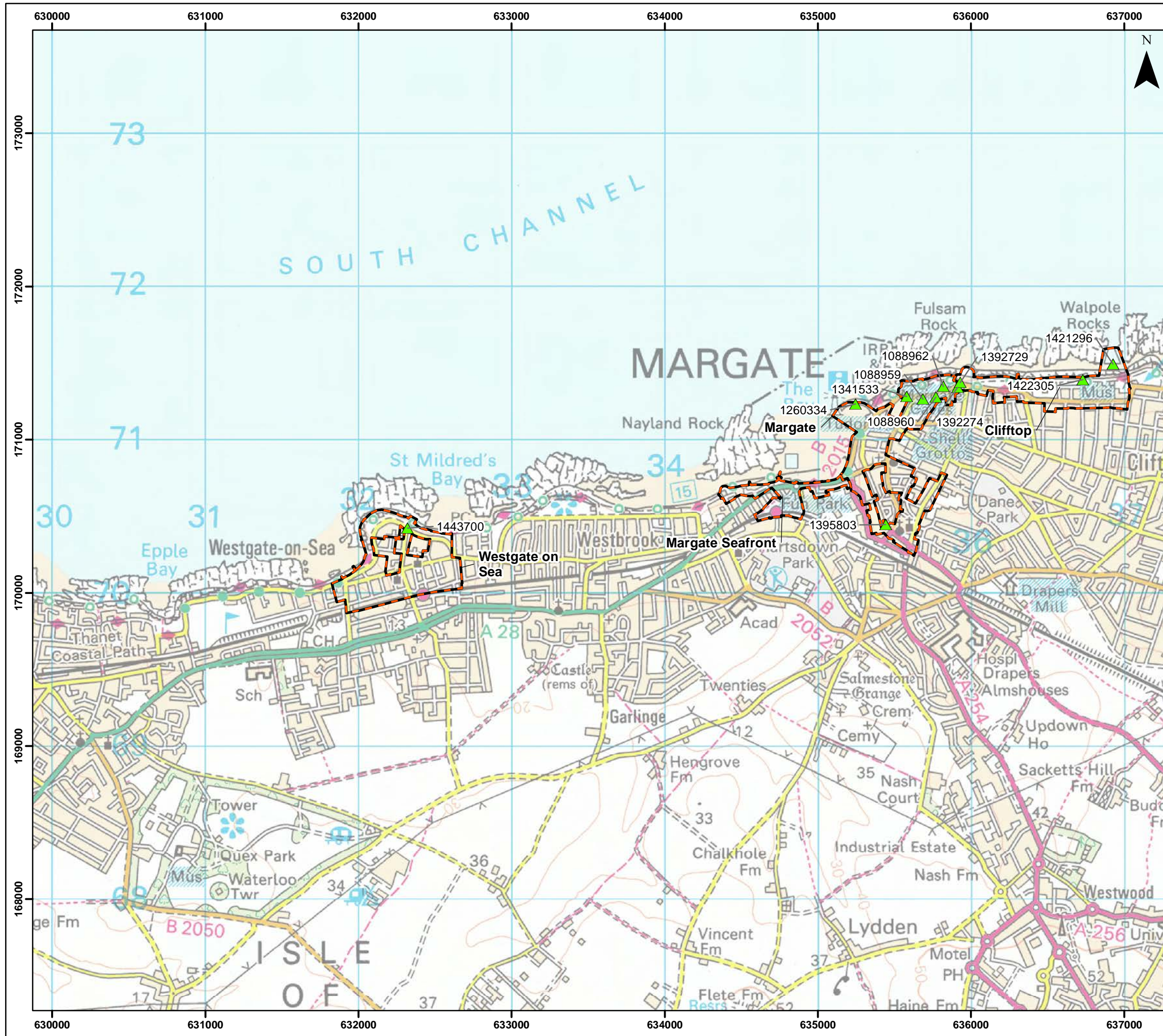
Datum: OSGB 1936  
 Projection: BNG



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Drg No	39080-Lon148a			<b>Figure 7.2a</b>
Rev	1.0	Date	02/05/2018	
By	JP	Layout	N/A	



**Figure 7.2b**  
Heritage Assets Potentially Subject to Indirect Effects

**Legend**

- ▲ Listed building - Grade II
- ▭ Conservation area

Datum: OSGB 1936  
Projection: BNG

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1:25,000 0 0.6 1.2 km

Drg No	39080-Lon148a			<b>Figure 7.2b</b>
Rev	1.0	Date	02/05/2018	
By	JP	Layout	N/A	



# THANET EXTENSION OFFSHORE WIND FARM

## Figure 7.2c Heritage Assets Potentially Subject to Indirect Effects

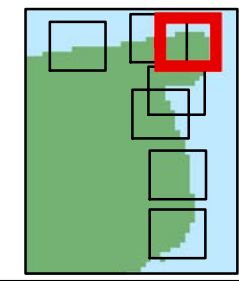
### Legend

- Listed building - Grade II
- Conservation area

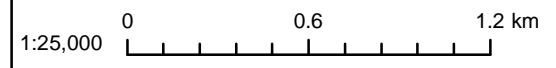


- 1222614
- 1239179
- 1239493
- 1223078

Datum: OSGB 1936  
Projection: BNG



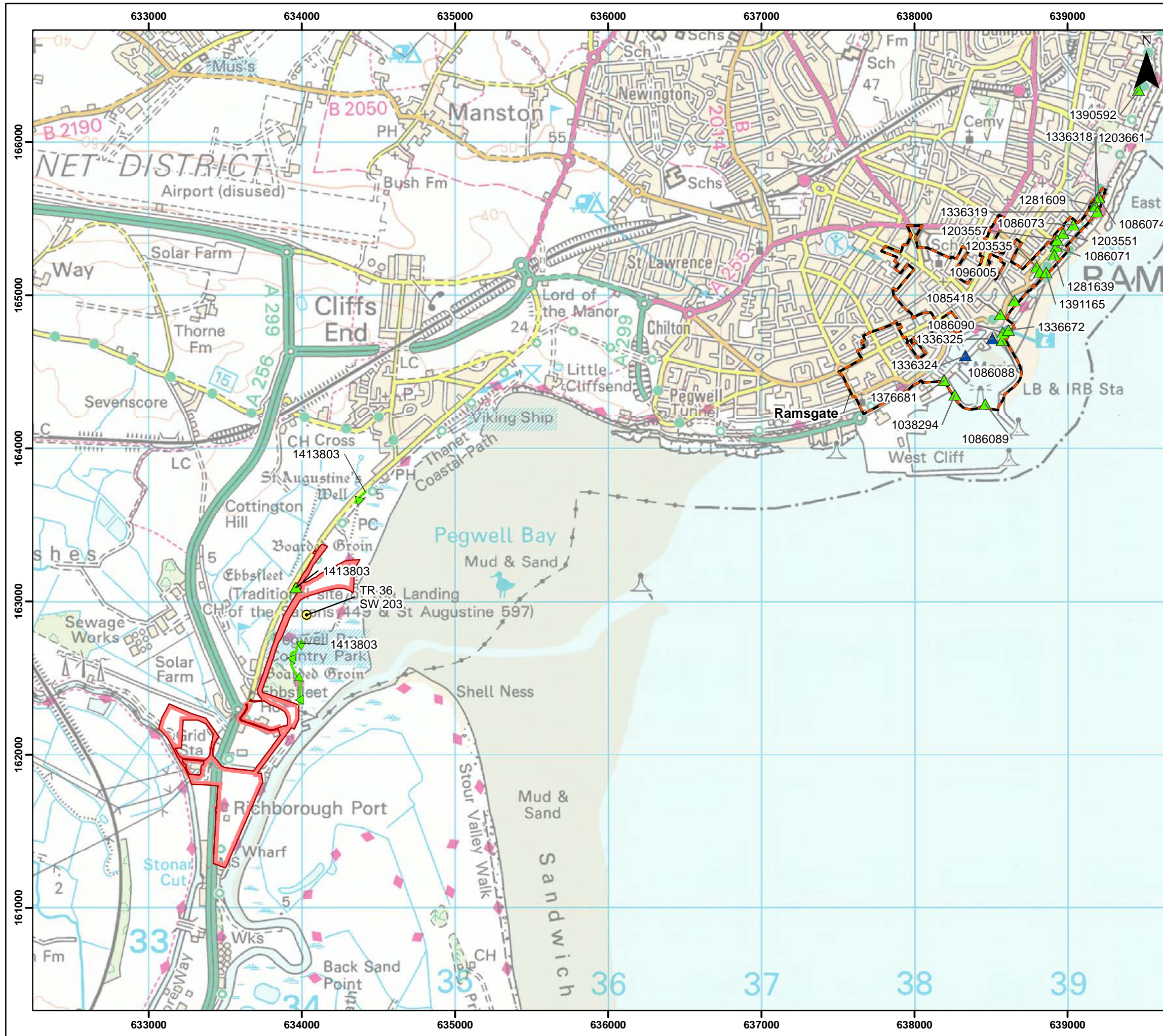
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### Figure 7.2c



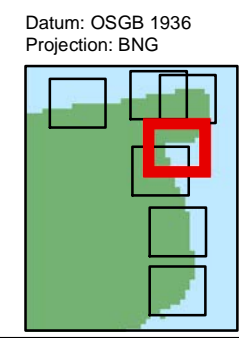


# THANET EXTENSION OFFSHORE WIND FARM

## Figure 7.2d

### Heritage Assets Potentially Subject to Indirect Effects

- Legend**
- Onshore Red Line Boundary
  - ▲ Listed building - Grade II\*
  - ▲ Listed building - Grade II
  - Non-designated heritage asset
  - Conservation area





## Figure 7.2e

### Heritage Assets Potentially Subject to Indirect Effects

**Legend**

- Onshore Red Line Boundary
- ▲ Listed building - Grade I
- ▲ Listed building - Grade II
- ★ Scheduled monument
- Non-designated heritage asset

Datum: OSGB 1936  
Projection: BNG

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1:25,000 0 0.6 1.2 km

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By	JP	Layout	N/A

Figure 7.2e



### Figure 7.2f

#### Heritage Assets Potentially Subject to Indirect Effects

- Legend**
- ▲ Listed building - Grade II
  - ★ Scheduled monument
  - Conservation area

- 1263093
- 1069892
- 1250740
- 1250763
- 1069891
- 1363433
- 1363430
- 1069918
- 1250376
- 1363438
- 1069756
- 1069907
- 1013380
- 1013381
- 1263121
- 1250721
- 1069882
- 1363431
- 1363429
- 1. 1363436
- 2. 1069885
- 3. 1069880
- 4. 1069917
- 5. 1069877

Datum: OSGB 1936  
Projection: BNG



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1:25,000 0 0.6 1.2 km

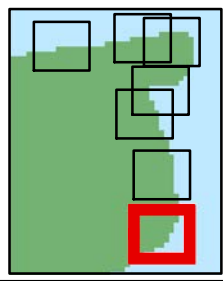
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Rev	1.0	Date	02/05/2018	
By	JP	Layout	N/A	



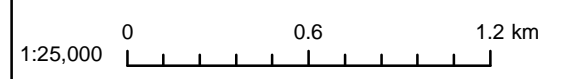
## Figure 7.2g Heritage Assets Potentially Subject to Indirect Effects

- Legend**
-  Listed building - Grade II\*
  -  Listed building - Grade II

Datum: OSGB 1936  
Projection: BNG



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Drg No	39080-Lon148a			<b>Figure 7.2g</b>
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By	JP	Layout	N/A	

## 7.10 Key parameters for assessment

- 7.10.1 This section identifies the maximum adverse scenario in environmental terms, defined by the project design envelope, to establish the maximum potential adverse impact.
- 7.10.2 The maximum design scenarios identified in Table 7.11 have been selected as those having the potential to result in the greatest effect on an identified receptor or receptor group. These scenarios have been selected from the details provided in the project description (Volume 3, Chapter 1: Onshore Project Description (Document Ref: 6.3.1)). Effects of greater adverse significance are not predicted to arise should any other development scenario, based on details within the project Design Envelope to that assessed here, be taken forward in the final design scheme.
- 7.10.3 Three landfall options are being considered. Further information about these options is set out in Volume 3, Chapter 1: Onshore Project Description (Document Ref: 6.3.1).

**Table 7.11: Maximum design scenario assessed**

Potential effect	Maximum design scenario assessed	Justification
Construction		
Disturbance or loss of heritage assets	<p>Landfall Option 1: Maximum of four TJBs to be located within the Potential Zone for Transition Pit, covering an area of up to 48 m<sup>2</sup> per TJB, with a temporary works area (up to 50 x 60 m) and a 5 m wide temporary access track up to 350 m in length.</p> <p>Landfall Option 2: TJBs with the same extent as Option 1 but located in surface-laid concrete structure within a soil berm up to 45 m wide and 2.3 m high. Temporary works area (30 x 40 m) and a 5 m wide temporary access track up to 350 m in length. Option 2 also requires a seaward extension of the existing sea wall (maximum seaward extension 18.5 m with a total length of existing seawall being amended to equal 155 m.</p> <p>Landfall Option 3: TJBs as Option 1, Temporary works area (30 x 40 m) and a 5 m wide temporary access track up to 350 m in length.</p>	Onshore intrusive construction works can be assumed to disturb or remove any above ground or near-surface archaeological remains within the construction area. More deeply buried deposits (i.e. deposits of geoarchaeological significance) may be affected by deeper intrusions.
	<p>Cabling from MHWS to the proposed substation includes four onshore export cable circuits (four cables per circuit) carried in up to four trenches.</p> <p>Landfall Option 1: up to 725 m of cable by to be installed in the Country Park based on a combination of open trenching (direct buried) and Horizontal Directional Drilling (HDD) methods. Proportion of each to be confirmed following Site Investigation (SI).</p> <p>Landfall Option 3 includes up to 725 m of cable to be installed in the Country Park by open trenching (direct buried) methods.</p>	
	<p>From the edge of the Country Park/Stoneless Nature Reserve cables will be installed by open trenching to the substation at Richborough Port, this will include up to four cable trenches approx. 1 m wide by 1.5 m deep and 3 m apart.</p> <p>13 m soil storage area to side of trenches and adjoining haul road (5 x 2.6 km).</p> <p>Up to 16 jointing pits. On joint pit for every 800 m of cable based on 4 cables).</p> <p>Three temporary construction works areas may be required. One at Pegwell Bay Country park, one at the substation (20,000 m<sup>2</sup>) and one to the south-east of the Baypoint Club area.</p> <p>HDD of 20 – 40 m from substation to Richborough Energy Park (REP): Two bores, single reception pit up to 30 x 20 m.</p> <p>Up to 700 m cable to be laid by open trenching within Richborough Energy Park.</p>	
	<p>Substation: Operational area is a max. 41,000 m<sup>2</sup>, additional construction compound (200 x 100 m) is a maximum. The largest equipment within the onshore substation will be the substation building, with a maximum height of 13.5 m, all other equipment will not exceed a height of 12.5 m. Foundation detail is being developed by on-going design. The ‘worst-case’ assumption for assessment is that a piled foundation will be used, with substantial sill beams and pilecaps.</p>	
	<p>Tenant Relocation Area No intrusive works are planned and this element of the application relates to change of operational use of existing hardstanding.</p>	

Potential effect	Maximum design scenario assessed	Justification
Visibility of WTGs and onshore infrastructure construction works (so as to cause loss of contribution of setting to significance of an asset)	Offshore: 28 months construction period. Intermittent visibility of construction, delivery and cable laying vessels with increasing visibility of WTGs as construction progresses.	Effects would initially be very limited but would gradually increase to approach those of the operational wind farm towards the end of the construction period as WTGs were constructed.
	Onshore: Landfall work - five months construction period Onshore cable circuits - 18 months construction period Substation – 12 months for civil construction works and 12 months for mechanical and electrical works Total duration – 30 months	Effects would be greater than operational due to increased visibility of construction plant, vehicle movements and noise, but would reduce towards operational levels gradually over the course of the works.
O&M		
Visibility of operational offshore and onshore infrastructure (so as to cause loss of contribution of setting to significance of an asset)	Offshore: up to 34 WTGs to be constructed, depending on final model chosen. Assessment has been undertaken of scenarios involving the construction of 28 12+ MW WTGs, each up to 250 m high to blade tip and 220 m rotor diameter, or 34 10 MW WTGs, each up to 210 m high to blade tip and 180 m rotor diameter. WTGs foundations have been assumed to be jacketed. One OSS with platform length to 70 m long by 50 m high by 55 m high (above HAT) and one meteorological mast. WTGs will be illuminated at night to standard specifications to avoid hazard to marine traffic and aviation.	Larger WTGs would have an increased ZTV and prominence in close and mid-range views, smaller WTGs would present a greater density of array in close views but would have a discernibly smaller ZTV.
	Onshore:  Landfall Option 2: Cable route within the Country Park to be covered with tapered berm generally up to 1.2 m high and 15.2 m wide depending on location and finalised design (TJB to be up to 2.4 m high). Sea wall to be extended up to 18.5 m seaward of current location. Landfall Option 2: TJB to be covered with berm up to 45 m wide and 2 m high. Overground cable within the Pegwell Bay Country Park to be covered with berm up to 1.2 m high and 15.3 m wide. Substation building will be up to 30 x 50 x 13.5 m, with further infrastructure of up to 12.5 m high.	Additional mounding would represent changes to the existing landscape character, which is predominantly flat having arisen from natural/ anthropogenic silting episodes. Mounding would also potentially disrupt sightlines and context of heritage assets.
Decommissioning		
Removal of visible infrastructure	Offshore: It is anticipated that the proposed WTGs will be removed at the end of the O&M period. Onshore: It is anticipated that any mounding will be left <i>in situ</i> but that the substation building will be demolished and external switchgear/ infrastructure removed.	Removal of visible elements of infrastructure would effectively reverse change to setting. Vehicle movements and demolition activity are anticipated to be limited in comparison to construction phase.

Potential effect	Maximum design scenario assessed	Justification
Cumulative effects		
Disturbance heritage assets which would be affected by Thanet Extension by other development in the immediate vicinity.	It is anticipated that the identified developments will be built out to their maximum permissible extent and that any archaeological features would be disturbed by construction.	Other development in the vicinity of the former military installation at Richborough Port, the medieval flood defences to the south and west of the site and the WWII anti-invasion defences have the potential to give rise to adverse cumulative effects.
Visual and perceptual change to the settings of heritage assets also affected by Thanet Extension (so as to cause a loss in the contribution that setting makes to the significance of an asset).	It is anticipated that the identified developments will be built out to their maximum permissible extent.	Other development which might be discernible from heritage assets have the potential to contribute to an adverse cumulative effect when experienced with Thanet Extension.



- 7.10.4 There is a large number and a wide variety of heritage assets the significance of which may be affected by the proposed Thanet Extension, including all associated infrastructure development. Design proposals are also at an early stage and subject to refinement within the parameters set out above. Consequently, the effects identified and assessed in section 7.11 and 7.12 below represent the worst-case for each individual asset. It is not likely, and in some cases not possible, for the worst-case to occur to all heritage assets in any case.
- 7.10.5 The requirement to identify worst-case scenarios for direct effects in any case within the specified design parameters effectively requires the assumption to be made that any heritage asset within the Red Line Boundary could be affected to the maximum extent possible by the proposed development. In reality, the linear nature of the export cable and the relatively small extent of the proposed substation building means that it would not be possible for the worst-case to be realised in every situation, and potentially all worst-case effects could be avoided or reduced from those identified at this stage.
- 7.10.6 In terms of change in the contribution that setting makes to the significance of heritage assets, factors to be considered are the magnitude of change as influenced by height, proximity and extent of the WTGs layout or other infrastructure as well as composition. Relatively minor changes to design could, in some cases, make substantial differences to the assessed magnitude of change (i.e., in the degree to which that setting is changed so that there is a loss in the contribution that setting makes to the significance of an asset, with potential for a loss in the overall significance of that asset). Conversely, large changes in setting can be acceptable where there is no or minimal loss in the contribution of that setting to the significance of the asset, and no consequent reduction in that asset's overall significance, nor in the way that is understood and appreciated.
- 7.10.7 Where worst-case effects are identified in the assessment presented in sections 0 and 7.12, an explanation is provided of the mechanism by which such effects would arise to allow subsequent assessment to be benchmarked against initial assessments.  
Embedded mitigation
- 7.10.8 Mitigation measures that were identified and adopted as part of the evolution of the project design (embedded into the project design) and that are relevant to the onshore historic environment are listed in Table 7.12. General mitigation measures, which would apply to all parts of the electrical transmission works, are set out first. Thereafter mitigation measures that would apply specifically to onshore historic environment issues associated with each element of the proposed development are described separately.

**Table 7.12: Embedded mitigation relating to historic environment**

Parameter	Mitigation measures embedded into the project design
General	
Onshore Project design	Careful routing of the onshore cable route and siting of the substation to avoid key areas of sensitivity.
Construction	
Onshore cable	<p>An agreed programme of archaeological work as identified through further assessment within the ES will be put in place to ensure that any heritage assets or deposits of geoarchaeological interest could be identified and recorded. This will be secured as a requirement of the DCO.</p> <p>Archaeological investigation and recording would provide a partial mitigation of the loss of archaeological interest, and would be less preferable to conservation of a heritage asset <i>in situ</i> (DECC 2011). Archaeological investigation and recording is therefore a partial mitigation that would reduce the magnitude of adverse change to a degree dependent on the interests that comprise the significance of an individual heritage asset.</p> <p>The Red Line Boundary has been defined to exclude designated elements of the anti-invasion defences and to minimise disturbance of the line of the Boarded Groin.</p>
Onshore substation	An agreed programme of archaeological work as identified through further assessment within the ES will be put in place to ensure that any heritage assets or deposits of geoarchaeological interest would be identified and recorded. This will be secured as a requirement of the DCO.
Offshore WTGs	As the construction period will last a limited time, any temporary increase in the magnitude of adverse change in the setting of heritage assets over that occurring during the O&M phase, would be of minor magnitude at worst. Indirect effects are therefore considered as O&M effects and there is no embedded mitigation.
O&M	

Parameter	Mitigation measures embedded into the project design
Onshore cable	<p>Reinstatement of cabling works.</p> <p>Establishment of buffer zone around the designated military structures to avoid immediate juxtaposition of pillbox with soil mounds. This would be secured through agreement of detail design.</p> <p>Restoration/strengthening of existing screening planting close to listed pillbox.</p>
Onshore substation	Retention or restoration of existing screening planting along northern edge of Baypoint club where practicable. This would be part of a scheme of landscape mitigation secured as a requirement of the DCO.
Offshore WTGs	The north-western extent of Red Line Boundary has been reduced, reducing the maximum north-westwards extent of the proposed WTG array. This would increase the perceived separation of the proposed WTGs from heritage assets in some views.
Decommissioning	
Onshore cable	No adverse direct effects are anticipated during the decommissioning phase as any intrusive works will be restricted to areas which have already been disturbed during the construction of Thanet Extension. As such there is no embedded mitigation.
Onshore substation	<p>No adverse direct effects are anticipated during the decommissioning phase as any intrusive works will be restricted to areas which have already been disturbed during the construction of Thanet Extension. As such there is no embedded mitigation.</p> <p>The decommissioning and demolition of the substation is expected to present minimal change to the magnitude of any operational effects due to the limited perceptibility and duration of works. In the long-term, decommissioning of the substation would restore the setting of onshore heritage assets (assuming all other factors remain the same) as visually intrusive elements of the scheme would be removed. As such no embedded mitigation for this phase is included..</p>
Offshore WTGs	The decommissioning and demolition of the WTGs is expected to present minimal change to the magnitude of any operational effects due to the limited perceptibility and duration of works. In the long-term, decommissioning of the WTGs would restore the setting of onshore heritage assets as visually intrusive elements of the scheme would be removed (all other circumstances remaining the same). As such no embedded mitigation for this phase is included.

## 7.11 Environmental effects: direct effects

### Disturbance of archaeological heritage assets during construction of the onshore cabling: The Boarded Groin (HER MKE76084/ TR 36 SW 203)

- 7.11.1 As a worst-case, the Boarded Groin in the area of the former landfill may be considered to be of High heritage significance, albeit non-designated, primarily for archaeological interest, although it is likely to be of lower significance as a result of prior disturbance.
- 7.11.2 The proposed cable route could cross the Boarded Groin within Pegwell Bay Country Park. At this point, it is believed that the Boarded Groin has been entirely removed or is deeply buried beneath modern landfill.
- 7.11.3 The Potential Zone for Transition Joint Bay extends to the south-west of the line of the Boarded Groin, and it is possible that this feature may be disturbed by the construction of the TJB within the landfill as proposed for Options 1 and 3.
- 7.11.4 At present, the depth and nature of the landfill is uncertain. It is possible that either all landfill material within the TJB area and cable trenches required for Options 1 and 3 will need to be removed to create a stable base for the cable trench and TJB, or that works may be deep enough to expose deposits underlying the landfill. In this case, it is possible that remains of the Boarded Groin may be exposed during cable trenching.
- 7.11.5 Disturbance of a very short section of the asset (if present) would not give rise to any substantial loss of archaeological interest, and is best considered as a low magnitude of change. It would be possible to partially mitigate any effect through the implementation of an agreed programme of archaeological investigation and recording secured through a Written Scheme of Investigation, which would reduce effects to a Negligible magnitude, an effect which is **Not Significant** in terms of the EIA Regulations.
- 7.11.6 Where the TJB and the proposed cabling would be located on the existing ground surface, (Option 2) no disturbance would arise.
- 7.11.7 The proposed cable route would come close to the line of the Boarded Groin near the Baypoint Sports Club, but works over the line of the Boarded Groin in this area would be limited to establishment of a temporary works compound. These works would be very shallow and would affect only deposits which have previously been disturbed during military use and in the construction of the Bay Point Sports Club. Consequently, no disturbance of buried elements of the Boarded Groin would occur.
- 7.11.8 The proposed cable route could intersect the very southern end of the line of the Boarded Groin to the north of the substation site at Ramsgate Road where the line of the Boarded Groin crosses the Minster Stream. In this area, the Boarded Groin is unlikely to survive in any coherent form as a result of canalisation of the Minster Stream.

- 7.11.9 In the absence of further mitigation, the significance of any effect would depend on the preservation and extent of those elements of the Boarded Groin within the landfill and at Minster Stream, which would be affected by the proposed works. It seems likely that the proposed works would primarily affect modern fill material and alluvial deposits, with a potential for the cable trench to disturb parts of the Boarded Groin which have already been disturbed. The Boarded Groin does not survive as an earthwork or palimpsest feature at this point. Consequently, it is likely to be of Low to Medium heritage significance, although it has been considered as of High heritage significance for the purposes of identifying a worst-case effect. Mitigation of loss of archaeological interest could be achieved through the implementation of an agreed programme of archaeological investigation and recording secured through a Written Scheme of Investigation. This would reduce the adverse effect to **Not significant**, in that a record will have been made (preservation by record).

### Disturbance of archaeological heritage assets during construction of the onshore cabling: Anti-Invasion defences at Pegwell Bay

- 7.11.10 It is possible that the proposed open-cut or overground cabling could disturb elements of the anti-invasion defences at Pegwell Bay. The Red Line Boundary is adjacent to the site of a pillbox which is listed at Grade II (NHLE 1413803), and there is the potential for further remains to be present. The eastern verge of Sandwich Road is particularly sensitive here, as the full extent of the obstacles identified in discrete clusters along this road is not clear and the vegetation growth could hide any further remains which may survive from inspection. Designated or particularly important non-designated elements of these defences would be of High heritage significance, though most below-ground remains would be of Low to Medium heritage significance.
- 7.11.11 The adoption of an appropriate exclusion zone around the listed pillbox during construction would be required to prevent inadvertent harm or disturbance of the designated remains. Other designated elements of the WWII defences are outwith the Red Line Boundary and would not be directly affected.
- 7.11.12 The proposed subsea cable installation area crosses the line of the pipeline element of the Fougasse (MWX 43182), which was a boom, lying up to 300 m below the High water mark. Aerial photography suggests that this feature was removed after WWII, although it is not clear how complete this removal would have been. If present, this non-designated asset would be of Medium- significance as part of a wider group of heritage assets, some of which are designated. Although the proposed offshore cable construction would disturb this feature (assuming it is present) the extent of disturbance, and any loss of heritage significance, would be limited. It would be possible to partially mitigate any effect through the implementation of an agreed programme of archaeological investigation and recording secured through a Written Scheme of Investigation, which would reduce effects to a Negligible magnitude, the effect of is **Not Significant** in terms of the EIA Regulations.

7.11.13 Elsewhere within the Red Line Boundary, these defences appear to have comprised less robust features which have since been removed, frequently leaving minimal archaeological remains. There are no surviving elements of the anti-invasion defences within the former landfill at Pegwell Bay Country Park, although such remains may survive along the east side of Sandwich Road. Disturbance of non-designated remains of the anti-invasion defences is likely to comprise a negligible adverse effect, although any effect would depend on the nature and preservation of assets affected. It would be possible to partially mitigate any such effect through the implementation of an agreed programme of archaeological investigation and recording secured through a Written Scheme of Investigation, which would reduce effects to a negligible magnitude, the effect of which would be **Not Significant** in terms of the EIA Regulations.

#### **Disturbance of archaeological heritage assets during construction of the onshore cabling: Richborough Port and related heritage assets**

7.11.14 The cable route and construction compound within and to the north of the Bay Point Sports Club would pass through an area which was formerly used as an RAF Salvage Yard. WWII aerial photographs of this area show an area of rough ground with a cluster of buildings in approximately the same location as the existing Bay Point Sports Club buildings. It is likely that archaeological remains here would be limited to poorly-preserved below ground elements of relatively ephemeral structures and chance finds of discarded military material. Disturbance of these remains could be mitigated through the implementation of an agreed scheme of archaeological works secured through a Written Scheme of Investigation, which would reduce effects to a Negligible magnitude, the effect of which would be **Not Significant** in terms of the EIA Regulations.

7.11.15 The cable route to the west of the A256 Richborough Road would be constructed within an area which was formerly sidings associated with Richborough Port. This area has been extensively disturbed during the construction, operation and demolition of Richborough Power Station, and it is not considered likely that any heritage assets survive in this area. Consequently, no discernible effect would arise (and effect assessed as **Not Significant**).

#### **Disturbance of archaeological heritage assets during construction of the onshore cabling: Deposits of geoarchaeological interest**

7.11.16 It is not considered likely that the proposed open-cut trenching or groundworks associated with the proposed construction compound would be sufficiently deep to give rise to any discernible effects on these deposits.

#### **Disturbance of archaeological heritage assets during construction of the onshore substation: The Boarded Groin (HER MKE76084/ TR 36 SW 203) and other medieval floodbanks**

7.11.17 The proposed substation option area at Richborough Port is located to the south of the southern end of the Boarded Groin (the KCC HER and the Ordnance Survey mapping show the Boarded Groin as having terminated within the BCA site), but contains a short stretch of another, un-named, floodbank of uncertain antiquity that extended south-east along the side of the River Stour. There are no visible remains of these features in this area which are not visible as earthwork features in aerial photography or mapping of the site subsequent to the construction of Richborough Port. Although buried remains *may* survive it is likely that groundworks associated with construction and demolition of military and industrial structures at Richborough Port would have substantially disturbed buried remains. Such disturbance would have reduced the heritage significance of any surviving remains, and in the absence of visible remains, it is likely that these remains would be of Low heritage significance for archaeological interest.

7.11.18 There is a potential that intrusive works associated with the construction of the proposed substation may affect these remains, but the limited area of the substation is such that this effect is not certain and would affect only a limited extent of these features and could conceivably have no effect.

7.11.19 It would be possible to partially mitigate any such effect through the implementation of an agreed programme of archaeological investigation and recording secured through a Written Scheme of Investigation, reducing the magnitude of adverse change to Negligible, the effect of which would be **Not Significant** in terms of the EIA Regulations.

#### **Disturbance of archaeological heritage assets during construction of the onshore substation: Anti-Invasion defences at Pegwell Bay**

7.11.20 It is not anticipated that construction of the proposed substation would give rise to any adverse effect on the anti-invasion defences at Pegwell Bay because these features are neither known, nor predicted, to have been present in the substation site. Potential disturbance of WWII remains of the former Richborough Port are considered below.

### Disturbance of archaeological heritage assets during construction of the onshore substation: Richborough Port and related heritage assets

- 7.11.21 The substation options area comprises land used as the rail access to the wharfage at Richborough Port (TR 36 SW 414) and some unidentified buildings, presumably warehouses, which are visible on aerial photographs, between Richborough Road, and a railway siding (AMIE 1358057, MWX 43282). These buildings had been demolished by the 1960s, although aerial photographs of the construction of Richborough Power Station show their footprint surviving and in use as a construction compound. The survival of remains associated with this use in this area is uncertain. The area has subsequently been covered with hard standing and it appears likely that the ground level has been raised. Potential remains are likely to comprise heavily disturbed elements of hard standings, foundations and service runs associated with these structures which would be of low heritage significance. The foundation design of the proposed substation is not yet known, and different options (e.g. piled or rafted foundations) would present different effects. As a worst-case, deeper elements of the proposed substation foundations would affect a relatively small area of the asset. It would be possible to partially mitigate any effect to a Negligible magnitude through the implementation of an agreed programme of archaeological investigation and recording secured through a Written Scheme of Investigation and the effect, the effect of which would be **Not Significant** in terms of the EIA Regulations.
- 7.11.22 It is also possible that additional disturbance of these features could give rise to loss of archaeological interest of the surviving remains of the former ferry berth, which is located outwith the Red Line Boundary. The absence of any discernible connection between the former ferry berth and the much-altered area immediately inland means that any contribution of this part of the setting of the asset, which survives only as a pair of dilapidated jetties extending into the Stour Estuary and is separated by dense shelter planting to the east of the Baypoint Sports Club, to historic interest is very restricted. Any adverse effects would be extremely limited, as any discernible connection between these features and the former ferry berth has been lost and the archaeological value of deposits and features in this area has been greatly diminished by past alterations to the rail network within Richborough Port and subsequent disturbance during reuse.
- 7.11.23 At present, it is proposed that the substation will be connected to the National Grid Richborough substation by an underground cable inserted by direction drilling below the A256 Richborough Road. Given the extent of disturbance at Richborough Port, these works would not give rise to any disturbance of heritage assets. Failure of the HDD is considered unlikely given the limited length of the proposed HDD, and even where open trenching is required in the event of failure, past disturbance of heritage assets means that no significant effect would be anticipated.

### Disturbance of archaeological heritage assets during construction of the onshore substation: Deposits of geoarchaeological interest

- 7.11.24 It is not considered likely that the proposed groundworks associated with the proposed substation and associated works would be sufficiently deep to give rise to any discernible effects on these deposits. Piled foundations may give rise to very limited and localised disturbance of these deposits, but would affect a very limited portion of an extensive deposit sequence and no loss of archaeological interest would occur.

### 7.12 Environmental assessment: indirect effects

- 7.12.1 The environmental assessment of indirect effects provided within section 7.12 has been provided for each asset. The opening paragraphs for each asset describes the heritage significance of the heritage asset and details on the contribution of the setting to the heritage significance of the assets as set out in Step 2 of the staged approach to proportionate decision taking defined by Historic England (Historic England, 2017). The elements of Thanet Extension to be assessed (the cable route, substation and/ or WTGs) for each asset will also be stated within these opening paragraphs. Section 7.11 will then provide a Step 3 assessment of the effects of the proposed development for the construction, O&M and decommissioning stages upon the assets. For the purpose of ease of reference, the identified receptors have been set out in alphabetical order.
- 7.12.2 The assessment of indirect effects has considered effects of Thanet Extension in combination with a baseline of existing wind farms including:
- The Existing TOWF;
  - The Kentish Flats (KF) Offshore Wind Farm (OWF);
  - The Kentish Flats Extension (KFE) OWF;
  - The Gunfleet Sands (GS) OWF;
  - The Gunfleet Sands Extension (GSE) OWF;
  - The Gunfleet Sands Demo (GSD) OWF;
  - The London Array Wind Farm; and
  - The Richborough Power Station WTG.
- 7.12.3 Greater Gabbard and Galloper OWFs have not been included within this assessment due to their distance, c. 50 km from the nearest onshore asset. As such any additional visibility of these wind farms will have a **Negligible** effect when added to the effects of the wind farms in closer proximity and would not give rise to any significant adverse cumulative effects in terms of the EIA Regulations.

**Effects arising from change to setting of the Abbot's Wall (HER MKE76083/ TR 26 SE 148)**

- 7.12.4 The Abbot's Wall is of High significance for archaeological and historic interests, albeit a non-designated heritage asset. The HER entry describes this asset as an earthen sea bank with an inner drainage ditch, in places separated from the bank by a berm. The asset is in good condition and encloses the Minster Marshes. The bank is interrupted at several points by sluices which are clearly contemporary. The "Abbot's Wall" was built by the Abbot of St Augustine along the River Stour to prevent the sea flooding the marshes. It is not known when it was built but an action in 1293, concerning the blocking of a creek at Minster twenty years previously, may refer to the building of the wall.
- 7.12.5 The location of the site topographically and geographically contributes substantially to the asset's understanding and heritage significance. The associative relationship with further sea defences and banks to the east are also important aspects of the current setting. The current setting of this site incorporates views over the wider area including the existing industrial elements of the landscape, many of which are heavily filtered and partially screened by shelter planting. Assessment of construction phase
- 7.12.6 Indirect effects on the heritage significance of the Abbot's Wall as a result of visibility of the substation construction would be limited to filtered views of minor elements of work at height on the substation construction. These would be visible beyond the existing industrial area to the east of the asset. These views would be temporary and short-lived. Such views are not in any case essential for understanding the significance of this asset. Consequently, this would not lead to any discernible change to significance, an effect assessed as **Not Significant**.
- 7.12.7 The minimal visibility and limited duration of the substation construction means that it would not contribute to any adverse cumulative effect.

*Assessment of O&M phase*

- 7.12.8 The location of the substation on the east side of the A256 carriageway means that the proposed substation would be screened by intervening shelter belts and industrial development in views of or from the asset. Due to the intervening planting and industrial development, it is not anticipated that there would be sufficient visibility of the proposed Thanet Extension WTGs or export cable to give rise to any adverse effects.

*Assessment of decommissioning phase*

- 7.12.9 This phase of works would be limited to visibility of elements of the substation decommissioning, which would be temporary and short-lived, and would reverse any indirect effects caused by the proposed development.

**Effects arising from change to setting of the Boarded Groin (HER MKE76084/ TR 36 SW 203)**

- 7.12.10 The Boarded Groin was one of a number of medieval floodbanks stretching along the banks of the Stour. It extended from Richborough Port in the south, almost to Cliffsend in the north. It is still visible as an earthwork feature along the southern side of Pegwell Bay, and is preserved as a ditch line along the west side of St Augustine's Golf Club. It is believed that the Boarded Groin has been either buried or disturbed by past landfill at Pegwell Bay Country Park, and by modern industrial use at Richborough Port. Visible elements of this asset hold historic and aesthetic interest, as illustrative of the reclamation of the Wantsum Channel, and for its contribution to the landscape character. However, the asset does not rely on any intentional visibility or views in order to understand or appreciate its place in the landscape or role in the historic reclamation of the marshland. Well-preserved elements, such as the stretch along the southern edge of Pegwell Bay, are considered to be of equivalent heritage significance to a scheduled monument and therefore it is considered to be of High heritage significance. Indirect effects are being considered in reference to Thanet Extension WTGs, the proposed substation and the surface-lain cable route.

*Assessment of construction phase*

- 7.12.11 Indirect effects on the heritage significance of the Boarded Groin as a result of visibility of the WTGs, substation construction and cable route over and above those presented by the completed structures would be temporary and short-lived. This would lead to a Negligible magnitude of change (to the contribution setting makes to the asset's significance) the effect of which is assessed as **Not Significant** in terms of the EIA Regulations.

*Assessment of O&M phase*

- 7.12.12 The buried cable and TJB options (Options 1 and 3) would not give rise to any lasting change in the setting of the Boarded Groin, and no adverse effect would arise.
- 7.12.13 Where a surface lain cable route is required within the vicinity of the Boarded Groin (Option 2), it will predominantly be visible as a low chalk-covered mound, which would be planted to maintain the chalk grassland habitat within the Country Park and would only marginally increase the division of the asset's setting, which currently also contains fence lines, hedgerows and scrubby planting. This bund would be located at least 100 m from the line of the Boarded Groin and would be largely screened by the intervening planting. The significance of the asset, nor the ability to understand or appreciate that significance is not affected. The change in the contribution setting makes to the significance of the asset presented by the operation of the majority of the cable route would be Negligible in magnitude, resulting in an effect which is **Not Significant** in terms of the EIA Regulations.

- 7.12.14 The substation would be located on the southern part of the Boarded Groin, although any visible remains in this location have been removed by the industrial development at Richborough Port. The last point where this feature is still discernible is along the eastern boundary of the Baypoint Club, where the boundary roughly follows the line of this monument. Further north the anti-tank cylinders that form part of the Grade II listed asset group in this area (NHLE 1413803) also roughly follow the line of the Boarded Groin for c. 280 m before the two assets diverge. In views towards the substation along the northern extent of the recorded Boarded Groin there are boundary hedges and shelter planting that would largely screen the proposed development, although more open areas on the banks of the River Stour to the south could provide clearer visibility. The screening that is present also means that views of the asset from the south-east are not currently possible other than in close proximity. The ability to understand and appreciate the Boarded Groin as an element of the changing landscape of the Wantsum Channel and Stour Estuary, is not significantly affected, and the contribution of longer views to sea to the overall significance of this asset is very limited. There are existing industrial structures surrounding the proposed substation location, although these are at a lower height to the proposed structure.
- 7.12.15 The closest proposed WTG to the Boarded Groin is located c. 17 km away and as such Thanet Extension WTGs could potentially appear as a very small and distant features on the horizon and only from a small area of the asset on its southern extent. The rest of the asset is screened from Thanet Extension WTGs by the Isle of Thanet. The views that may be available from the southern extent of the asset, although being part of key views out to sea, would view Thanet Extension WTGs beyond the Port of Ramsgate. This would provide a further sense of separation and introduce further large scale industrial elements to these views as a result of the transporter ships and ferries that use this facility.
- 7.12.16 With regards to Thanet Extension WTGs appearing in addition to the existing wind farms only TOWF and the Richborough WTG are considered. All of the other existing wind farms included within the baseline are screened by the intervening land. From the distance involved the distinction between TOWF and Thanet Extension would be difficult to determine, although the increased width of Thanet Extension and increase in height would make the development marginally more noticeable. The combination of the existing and proposed Thanet WTGs would not be seen within the same arc of view as the closer and more prominent Richborough WTG.
- 7.12.17 Should the existing wind farm be decommissioned at the end of its use, Thanet Extension would provide a more dispersed composition and as such would have less definition as a feature on distant horizon that is frequently indistinct.
- 7.12.18 Although the Boarded Groin has associative relationships to the sea, it is not readily visible from the sea except in very close proximity, and was not designed to be viewed from the sea. As such views from offshore locations do not contribute to its heritage significance.

- 7.12.19 Due to the distance between the Boarded Groin and Thanet Extension WTGs, the presence of Ramsgate and its associated port intervening in views, and the limited contribution of longer views to sea from the Boarded Groin, visibility of Thanet Extension WTGs would not contribute to any loss of significance.
- 7.12.20 The absence of perceptual change resulting from the construction of Thanet Extension WTGs, means that adverse effects could arise only from the appearance of the substation and other elements of the onshore elements of the proposed scheme. However, given that the asset's significance (and the ability to understand or appreciate that significance) does not rely on designed views or indeed visibility of the sea and taking into account intervening planting, the limited scale of the proposed development and the negligible contribution of views from the asset towards the proposed substation, it is considered that the proposed substation could have, at worst, a Negligible magnitude of change (in the contribution made by setting to the asset's significance). The effect is assessed as **Not Significant** in terms of the EIA Regulations.
- 7.12.21 Other developments considered in the cumulative assessment would be screened in views of and from the Boarded Groin, and no adverse cumulative effects are anticipated to arise.

#### *Assessment of decommissioning phase*

- 7.12.22 This phase of works would reverse any indirect effects caused by the proposed development and no significant is identified in terms of the EIA Regulations.

#### **Effects arising from change to setting of Broadstairs Conservation Area and Selected Grade II Listed Buildings**

- 7.12.23 The Broadstairs Conservation Area is considered to be of Medium heritage significance and the associated Grade II listed buildings are considered to be of High heritage significance for architectural and historic interest.

7.12.24 The Broadstairs Conservation Area includes the Crow Hill, Nelson Place, Albion Street, lower High Street and Harbour character areas to the north together with the Promenade and Victoria Parade area to the south. The Victoria Parade character area includes a working harbour which contains a number of listed buildings and forms a focal point for the conservation area, essentially facing east across the harbour and Viking Bay, then out to sea. Much of the interest in the Area is from the architectural and historic detail of the buildings as they front on to Viking bay, with the pier and higher land to the north and south framing the bay and providing a sense of enclosure (certainly at street level wan on the breach). Much of the architectural interest in the various listed buildings is best appreciated in close proximity where the detail and association with streets and neighbouring structures can be best realised. Views from the clifftops across Viking Bay are set against a backdrop of the English Channel and Thames approaches, and include a number of listed buildings, primarily rows of Edwardian and Victorian quality terraced housing lining the promenade, with the Grade II listed Bleak House (NHLE 1239493) forming a prominent feature on the horizon. The Look Out House, Stores and The Pier (NHLE 1422305) and harbour form focal points at a lower level. Views from the higher ground surrounding the bay are important in appreciating the overall, unintended, architectural composition of the conservation area and its relationship to the harbour and sea. Away from the seafront, the viewer passes through narrow streets, with flint homes and boundary walls, cottages and shops (Broadstairs & St. Peter's Town Council, 2011). The individual designated and non-designated buildings within the conservation area contribute to an overall composition which reinforces the architectural and historic interests of individual heritage assets. The area as a whole derives heritage significance from architectural and historic interests inherent in the buildings and spaces it contains, and through association with the harbour and with the mid-19th to late-20th century fashion for day trips and holidays to seaside resorts and through associations with the history of the town as a port. Both aspects are reflected by continuing uses within the conservation area.

7.12.25 The Grade II listed Bleak House (NHLE 1239493) has a specific heritage interest in its association with Charles Dickens. Dickens stayed at this guest house and planned Bleak House and wrote other works (including David Copperfield) there. The house was originally known as Fort House and was renamed after the famous novel sometime after its publication. The building is currently still in use as a hotel and bar, but it does preserve an area dedicated to Dickens' stay (including a desk said to be the one at which the author did his writing whilst a guest). The building's principal frontage faces south over a small garden and overlooks the bay, but the eastern, higher part of the house provides view in all directions from its upper floors. The List Entry mentions that some internal features may be original, but the property has been substantially altered since its construction in the early Nineteenth century, not least when it was refronted and extended in 1901. The Entry specifically states "Grade II for Dickens associations" (See NHLE list entry available at <https://historicengland.org.uk/listing/the-list/list-entry/1239493>, accessed 7<sup>th</sup> June 2018)

7.12.26 The setting of the majority of the Listed Buildings within the Area is considered to be the historic core of the town itself, whilst those buildings fronting the beach and including the Look Out House, Stores and the Pier as well as Bleak House are considered to have wider settings that takes in the bay, and the Channel beyond.

7.12.27 TOWF is visible from the seafront and Victoria Parade, where it forms a discrete element of sea views, and is understood as a distant, offshore development. The nearest of the WTGs is approximately 10 km from the northern costal section of the Conservation Area

7.12.28 The potential for indirect effects upon the significance of the Broadstairs Conservation Area and selected Grade II listed buildings within it are considered in relation to Thanet Extension WTGs. Other elements of Thanet Extension will not be visible in views of or from the conservation area and would not contribute to any change to setting.

#### *Assessment of construction phase*

7.12.29 Indirect effects on the heritage significance of the Broadstairs Conservation Area asset group as a result of visibility of the WTGs construction over and above those presented by the completed array would be temporary and short-lived and as such would lead to a Negligible magnitude of change the effect of which is assessed as **Not Significant** in terms of the EIA Regulations.

#### *Assessment of O&M phase*

7.12.30 The closest WTGs would be c. 10 km from the northern tip of the coast within the conservation area, and typically 10.5 km or more for the rest of the Area. The WTGs would appear in views looking out to the north and east from the conservation area (and the existing TOWF is already visible in these views), but would not be visible from within the western and northern extents of the designated area due to the existing streetscape. The amendment to the offshore Red Line Boundary would relocate the westernmost WTG to the east, but would otherwise make little discernible difference to the WTG layout considered within the PEIR.

7.12.31 The Thanet Extension WTGs will be noticeably closer and larger in scale than the existing WTGs, but will still be seen as a distant element in seawards views. A representative illustration is provided at Figure 12.31 (Volume 2, Chapter 12: Seascape Landscape and Visual Impact Assessment (Document Ref: 6.2.12)).

7.12.32 Notwithstanding the increase in the number and proximity of WTGs visible in views from the seawards side of the Area, or in views across the Area and Viking Bay from the south (such as from Victoria Gardens), it is not considered that the heritage interests of the listed buildings or the Area itself are affected. Whilst the proposed WTGs will cause a change in the current setting, this change does not significantly affect (or reduce) the contribution of the setting to the significance of the assets assessed here.



- 7.12.33 The primary significance for Bleak House derives from its association with Dickens and this association is not affected or in any way diminished as a result of the proposed WTGs. Even where the proposed WTGs are visible in views across the bay north towards the House, the WTGs do not compete with the building nor overtop it, nor diminish the ability to appreciate the prominent positioning of the House in relation to the town, nor reduce its contribution to the character and appearance of the conservation area as a whole. Views from the house out to sea are still available, albeit with more turbines in view.
- 7.12.34 The significance of the listed buildings fronting the beach derives from their association with the development of the town from a fishing port into a resort and holiday destination; this is not affected, nor is the ability to appreciate or understand this historic development jeopardised. The relationship of the assets on Victoria Parade and Albion street to the bay and harbour is unaffected.
- 7.12.35 Whilst views out to sea, and across the Bay are important in appreciating the design and function of some of the buildings, the proposed WTGs do not prevent such views being available. It is the availability of such views along with a location facing the shallow and sandy bay, that is important in understanding the significance of the buildings along Viking Bay, not what is specifically in those views.
- 7.12.36 Similarly, the contribution that the harbour-side setting makes to the significance of the Look Out House, Stores and The Pier (NHLE 1422305) is not reduced, notwithstanding the increased numbers of WTGs visible either from or in combination with these buildings. They will continue to be appreciable for their own intrinsic architectural and historic interest, and as contributors to the overall value of the Conservation Area.
- 7.12.37 The harbour is a key part of the setting for the listed buildings along the sea front and pier, and forms a key aspect of the character and appearance of the Conservation Area. The harbour is used primarily by relatively small craft, comprising fishing and pleasure boats (AIS Marine Traffic: [www.marinetraffic.com](http://www.marinetraffic.com)). These craft primarily travel close to the coast, and the proposed wind farm would not intervene in views of the conservation area from the majority of marine traffic accessing the harbour. Views from the seaward side in which Thanet Extension could intervene would be from a distance of over 20 km, at which separation it would be difficult to discern even the location of the conservation area. Consequently, visibility of Thanet Extension in views from the sea would not contribute to any adverse effect, in that the contribution that this aspect of the setting of Broadstairs' setting and significance are unharmed.
- 7.12.38 The character and appearance of the conservation area is considered to receive some effect in that the visibility of the turbines when viewed across the Area from the vicinity of Victoria Gardens. In this view the turbines will be clearly visible above the Look Out House and Pier, and will seem to run onshore behind the higher ground at the northern end of the Area where that rises towards Bleak House, breaking the sense of enclosure for the bay provided by those features. The effect will diminish the further north into the town and downslope into the bay the viewer moves.
- 7.12.39 However, the historic interest in the Area as a seaside resort, in which the buildings and space around the harbour continue to evidence the development of the town from a fishing harbour and small port into a holiday destination is not diminished. The ability to appreciate the architectural interest and detail in the buildings and spaces that lie within the area (and which contribute to its character and appearance) is also not diminished.
- 7.12.40 The visibility of turbines in views across the Area from the south will cause a small change in appearance. As this only affects limited views and does not affect the whole of the Area (nor its role in defining an appropriate setting for those listed buildings within it), the magnitude of the effect is considered to be Low upon an asset of Medium sensitivity. The effect is therefore assessed as of **Minor** significance. This is not significant for purposes of the Regulations and considered to constitute less than substantial harm. The effect applies only to a change in the character and appearance of the Area in views to the north and northeast from the southern part of that Area.
- 7.12.41 Whilst there is a change in setting in that more turbines will be visible and closer, it is not considered that the contribution the setting makes to the significance of the assets within the Area is diminished; sea views are still available, and the ability to appreciate the relationship of the area and assets to the coast and sea beyond is not reduced. The heritage interests in those assets is not affected and the overall significance of the assets is not reduced. The magnitude of the potential impact upon the Listed Buildings is therefore assessed as negligible, upon an asset group of high sensitivity (by virtue of their national designation and group value).
- 7.12.42 The significance of the effect on the Listed Buildings is therefore assessed as Not Significant, and no reduction in, or harm to the significance of any Listed asset is considered to occur. The listed buildings and their special interest are considered to be preserved in an appropriate setting and are not subject to any harm.
- Assessment of decommissioning phase*
- 7.12.43 This phase of works would, all other circumstances remaining the same, restore the current settings of heritage assets in the Broadstairs Conservation Area (and the Area itself). As the significance of those assets is not affected, the potential effect is assessed as **Not Significant** in terms of the EIA Regulations.

### Effects arising from change to setting of Church of St Peter, Sandwich (Grade I Listed, NHLE 1343813)

7.12.44 This structure is considered to be of exceptional interest, reflected by its Grade I listing and as such is of High heritage significance. The building derives heritage significance from its historic, archaeological, and architectural interest. The potential changes to setting resulting from Thanet Extension WTGs and the onshore substation are considered within this assessment.

7.12.45 The town of Sandwich, in which the Church of St Peter is located, makes the greatest contribution to the setting of this asset due to the direct relationship between the church and the surrounding community which it served. It is from within the town and in relatively close proximity to the Church that its architectural detail is best appreciated, and where its historic interest in relation to its place within the town, both in terms of location and time are best appreciated. The wider landscape and connection to the sea trade (via the River Stour) is also an important aspect of the setting due to the association of the church with the medieval Cinque Ports and its subsequent use by the 'Strangers', Dutch and Flemish cloth workers who had migrated to the area. Views from the platform at the top of the church tower contribute to the asset's heritage significance, and are the only direct visual link between the church and the wider landscape outside its immediate surroundings within the town as shown in Figure 12.46 (Volume 2, Chapter 12: Seascape, Landscape and Visual Impact Assessment (Document Ref: 6.2.12)). Nevertheless, it does not rely on the specific long range visibility for its overall significance, which is largely derived from its historic and architectural values, and the contribution its setting within the historic core of the town makes to that significance.

#### *Assessment of construction phase*

7.12.46 Indirect effects on the heritage significance of the Church of St Peter as a result of visibility of the WTGs and substation construction over and above those presented by the completed structures would be temporary and short-lived and as such would lead to a Negligible magnitude of change the effect of which is **Not Significant** in terms of the EIA Regulations.

#### *Assessment of O&M phase*

7.12.47 The substation would be located c. 3.5 km to the north of the Church of St Peter. In views out from the asset in this direction there are a number of modern structures, including Discovery Park which would appear closer and larger in scale than the proposed substation. It is also likely that the buildings at Discovery Park would screen the proposed substation in these views.

7.12.48 The closest proposed WTGs to the Church of St Peter would be located c. 22 km away, and as such Thanet Extension WTGs could appear in favourable weather conditions as distant features on the horizon. Although there are views out from the top of the church in all directions, it is the availability of these views and the ability to see the Church tower at distance that are important; the Development would not affect this aspect of the wider setting. Thanet Extension WTGs would appear only as peripheral elements in views of specific points of interest identified in interpretation material in the church. The views from the top of the church which contribute to historic interest also focus on the closer elements of the landscape with viewers looking at the foreground and the surrounding historic structures within the historic core of the town (which is the major component of its setting) and immediately outside Sandwich, such as the White Mill. The longer views, particularly over the industrial areas to the north, also present a sense of a changed and changing landscape in which the proposed Thanet Extension WTGs would not be incongruous introductions.

7.12.49 With regards to Thanet Extension WTGs appearing in addition to the existing wind farms only the existing TOWF and the Richborough WTG is considered as all others included within the baseline are screened in these views by the intervening land. From the distance involved, the distinction between TOWF and Thanet Extension would be difficult to determine although the increased extent of Thanet Extension WTGs and increase in height of the WTGs would make Thanet Extension marginally more noticeable. The combination of the existing and proposed Thanet WTGs would not be seen within the same arc of view as the closer and more prominent Richborough WTG.

7.12.50 Should TOWF be decommissioned at the end of its use Thanet Extension array would provide a more dispersed and uniform composition. As such, it would have less definition as a distant feature on distant horizon that is frequently indistinct, reducing any magnitude of change.

7.12.51 The Thanet Extension WTGs will not affect the heritage interests in the Church, nor relationship of the Church to the town (its immediate setting), nor reduce the ability to appreciate the significance of the asset in respect of its architectural and historic interest.

7.12.52 As there is no change in the contribution that the Church's setting makes to its significance, and its overall significance is thus not reduced, an effect of negligible magnitude is found and this is **Not Significant** in terms of the EIA Regulations.

7.12.53 No harm is found to the significance of this asset as its significance is not in any way diminished, nor is the ability to appreciate or understand that significance reduced. The Church and its setting are considered to be preserved for purposes of the Infrastructure Regulations 2010.

### *Assessment of decommissioning phase*

7.12.54 There may be short-term visibility of decommissioning works at the substation, which would not contribute to any adverse effect. Decommissioning of the Thanet Extension WTGs would have the effect of restoring the current setting (all other circumstances remaining the same), and no significant effect is assessed to occur.

### **Effects arising from change to setting of Clifftop Conservation Area and Selected Grade II Listed Buildings**

7.12.55 The Clifftop Conservation Area is considered to be of Medium heritage significance and the associated Grade II listed buildings are considered to be of High heritage significance, reflected by their designated status. Indirect effects upon these assets are considered in relation to Thanet Extension WTGs alone. Other elements of Thanet Extension would not be visible in views of or from the conservation area and would not contribute to any change to setting.

7.12.56 The existing TOWF is visible with varying degrees of prominence, primarily in glimpsed views from the streets and in more open, but oblique views along the clifftop and sea front from the open areas at the clifftop which are the focal point of the conservation area's architectural composition. In these views, it is seen as a distant feature that does not compete with the general streetscape and high quality of architecture. TOWF appears as one of a group of offshore wind farms that are each distinct and distant from the conservation area. Views to the east from Eastern Esplanade are limited by the Thanet Indoor Bowls Centre and modern development within the conservation area at Cliftonville, including the Bethesda Medical Centre and modern residential development. Views eastward from the open ground around bandstand are limited by windbreaks and the buildings on First Avenue, limiting visibility eastwards to the Queen's Promenade along the clifftop.

7.12.57 This asset group derives heritage significance from its architectural and historic interests and through its association with the mid-19<sup>th</sup> to late 20<sup>th</sup> century fashion for day trips and holidays to seaside resorts. The conservation area was designated as a well-preserved Victorian seaside resort with most of the original streets, spaces and buildings remaining relatively unaltered. Built to high standards of design and construction from the 1860s onwards, the buildings provide a well-preserved example of historic seaside architecture which is comparable in quality to seaside developments of similar date elsewhere in England (TDC, 2016).

7.12.58 The conservation area has an open feel on the northern side of the designation within the green spaces with uninterrupted views of the sea being a key characteristic. Views out to sea in an arc from the north-west to north-east, down along the beaches, and across the various public open spaces are of particular interest as are views down each cliff-face cut (Newgate Gap and Hodges Gap). Thanet Extension WTGs would appear on the periphery of some views to the north. Thanet Extension WTGs would appear in views looking along the clifftop from the north-west as shown in Figure 12.40 (Volume 2, Chapter 12: Seascape Landscape and Visual Impact Assessment (Document Ref: 6.2.12)). Sea views, the quality of the architecture (which was built to high standards of design and construction from the 1860s onwards and provide a fine example of historic seaside architecture) together with the chalk cliffs, all contribute substantially to the setting of this group of assets.

### *Assessment of construction phase*

7.12.59 Indirect effects on the heritage significance of the Clifftop Conservation Area asset group as a result of the WTGs construction over and above those presented by the completed array would be temporary and short-lived and as such would lead to a Negligible magnitude of change the effect of is **Not Significant** in terms of the EIA Regulations.

### *Assessment of O&M phase*

7.12.60 Thanet Extension WTGs would be visible from the conservation area at a distance of 10 km and over as peripheral elements within views northwards across the Thames estuary from the open spaces on the northern side of the designated area and the associated listed structures. Thanet Extension WTGs would appear around the existing TOWF and could increase the field of view occupied by WTGs on either side of the existing TOWF. The screening offered to the existing TOWF by the buildings within the conservation area and the cliffs would offer some, but lesser screening to the taller Thanet Extension WTGs, which would be more prominently visible from a greater number of locations, although the degree to which this change would be noticeable would depend on the scale and location of the proposed WTGs.

7.12.61 The majority of the undesignated buildings contained within the conservation area that contribute positively to the asset's heritage significance face out to the north with a narrower field of view than the open spaces and as such, views of the WTGs would be very limited when looking out from these structures. Views from non-designated buildings that face east would be predominantly screened from Thanet Extension WTGs by further structures, with the exception of the Walpole Bay Hotel on Fifth Avenue, which has minor views eastwards from the rear of the building from upper storeys. Views across the conservation area from the north-west on the northern extent of the designated area would include Thanet Extension WTGs along the sea horizon (Figure 12.40 (Volume 2, Chapter 12: Seascape Landscape and Visual Impact Assessment (Document Ref: 6.2.12))). Thanet Extension would be visible in views of the Cliff Lift (NHLE 1422305) from the west.

- 7.12.62 With regards to Thanet Extension appearing in addition to the existing wind farms, all of the wind farms included within the O&M assessment baseline, other than the Richborough WTG, are visible from the northern extent of the Clifftop Conservation Area. Views towards the Richborough WTG are screened from the conservation area by further buildings within the wider area. Visibility of offshore WTGs would be most notable in the open areas, particularly the Grade II listed Walpole Bay Tidal Pool (NHLE 1421296) from where wind farms are visible in all directions when looking out from the asset.
- 7.12.63 Thanet Extension would appear primarily as a distant element of views out to sea and would not be incongruous with the current setting of the conservation area. The addition of Thanet Extension to the existing TOWF WTGs would, however, increase the field of view occupied by WTGs and the different scale of WTGs in the TOWF and Thanet Extension arrays, the disruption of the existing grid pattern and stacking and overlapping of WTGs would limit the degree to which Thanet Extension would be perceived as a logical extension of the existing array.
- 7.12.64 In views from the Clifftop conservation area, the closest WTGs visible would be located further from the viewer than in the layout considered at PEIR as a result of the change to the offshore Red Line Boundary, consequently appearing with discernibly reduced prominence.
- 7.12.65 Vessels passing through this area closer to the coast consist of relatively small craft, comprising fishing and pleasure boats. Larger vessels traveling through the area further from the shore where views of the asset could be disrupted by Thanet Extension WTGs over 15 km from the assets, at which distance the conservation area and the individual assets contained therein would be difficult to discern. Consequently, visibility of Thanet Extension WTGs in views from the sea would not contribute to any adverse effect.
- 7.12.66 The significance of Clifftop is not subject to any change – its architectural detail and function can still be readily appreciated, and it does not rely on visibility to or from it for that significance. Any effect is therefore assessed as Negligible in magnitude, the effect of which is **Not Significant**. No views out in the direction of Thanet Extension WTGs are possible from Remains of The Clifton Baths at Cliftonville Lido (NHLE 1392729), and this asset is not readily discernible in views which include Thanet Extension WTGs. No adverse effect is anticipated.
- 7.12.67 The significance of individual buildings within the area is not found to be affected by any intervisibility with the WTGs as the contribution of the current to their significance is not so altered that they lose overall significance as a result.
- 7.12.68 The significance of the conservation area fundamentally stems from its architectural and historic interest in the buildings and space within it which evidence the development of the area as a planned seaside resort, and in the subsequent economic and social development of the town. The setting is related to, on its north side, the coast. Much of the Area's character derives from how the coast has been accessed and used to support the tourism upon which this area depends. The architectural detail and historic interest in individual buildings within the area is best appreciated in relatively close proximity, and this is not affected by the proposed WTGs. The overall historic development and character of the area can still be readily appreciated (and to some extent is best seen in plan). Where buildings front onto the Eastern Esplanade and overlook the beach and or provide views along the seafront, it is the availability of this view that is being exploited here, and not specifically what is in those views. The strong sense of identification with the coast as a recreational resource here is still appreciable, and the character of the area planned as a more genteel and higher quality resort in comparison to the Margate Old town, is still able to be understood.
- 7.12.69 Whilst the Thanet Extension WTGs will be a clearly visible addition to such views, these views already include more distant turbines, and considerable amounts of sea traffic. Their presence does not prevent views out to sea, affect the ability to appreciate or understand how the Clifftop area relate to the coast, nor in how the coast is accessed from within the Area. Nevertheless, the turbines bring strong upright and industrial elements closer to the beach and sea front, and will have some effect on the character of the Area in views along its frontage to the east. As a result, it is considered that there is some reduction in the contribution that this element of the Area's setting makes to the significance of the Area, and result in a minor reduction in the significance of the Area as a whole. The magnitude of the effect is considered to be low, upon an asset of medium sensitivity, and the overall effect is therefore assessed as of **minor** significance. This is not significant for purposes of the EIA regulations.
- 7.12.70 Whilst there is some loss of significance to the Conservation Area, this is confined to views eastwards along the northern, seaward side of the Area, where the character of the views takes on a more industrial aspect due to the increase in proximity, number and size of the turbines that will be visible across the seafront and along the coast. As this effect is confined to the edge of the Area, and as it does not impinge upon the ability to appreciate and understand the development of the Area, nor the architectural value of the individual assets within it, any harm is considered to be less than substantial.
- 7.12.71 The significance of individual buildings within the area is not found to be affected by any intervisibility with the WTGs as the contribution of setting to their significance is not so altered that they lose overall significance as a result (and consequently no harm is identified).

*Assessment of decommissioning phase*

7.12.72 Decommissioning of the Thanet Extension WTGs would have the effect of restoring the current setting (all other circumstances remaining the same), and no significant effect is assessed to occur.

**Effects arising from change to setting of scheduled double ring ditch and two enclosures north-west of Danes Court (NHLE 1004230)**

7.12.73 The NHLE text describes this asset as a rectilinear enclosure, ring ditches, linear ditches and pits surviving as buried remains. It is scheduled for its archaeological interest and is considered to be of High heritage significance.

7.12.74 It is situated on gently sloping ground near Danes Court Gardens, west of Broadstairs. This asset no longer has any visible above-ground remains although the setting of the asset still contributes to the heritage significance of the asset due to the history and degree of change in the landscape with Thanet once being an island and the associative relationships with other designated and non-designated historic and archaeological assets within the area. The features which have been recorded as crop marks represent the surviving ditches of an Iron Age and Romano-British settlement complex possibly used into the Anglo-Saxon period. The ZTV shows theoretical visibility of Thanet Extension from the northern half of the scheduled area.

7.12.75 Site visits identified that the views from this location looking towards Thanet Extension and substation locations are screened by woodland planting which even within winter would preclude any views available. The scheduled area is located within a slight dip within the topography providing a sense of containment from the surrounding landscape features. Due to the screening provided by intervening planting and buildings, it is not anticipated that there would be sufficient visibility of any elements of Thanet Extension to give rise to any adverse effects and no further assessment of indirect effects is considered necessary.

**Effects arising from change to setting of the scheduled Anglo-Saxon cemetery, Dane Valley Road (NHLE 1003601)**

7.12.76 The NHLE text describes this asset as an Anglo-Saxon inhumation cemetery surviving as buried archaeological remains. It is situated on gently sloping ground between Broadley Road and Shallows Road, north-west of Broadstairs, and as a scheduled monument, it is of High significance for archaeological and historic interest.

7.12.77 The cemetery is located on the site of earlier Bronze Age round barrows and there has been partial excavation of the Anglo-Saxon cemetery. Investigations uncovered 388 inhumations, many with associated grave goods, aligned in rows and orientated north-west to south-east. Over half the graves have structural features including penannular ditches. The setting of this asset contributes to the heritage significance of the cemetery due to but not limited to the history and degree of change in the landscape with Thanet once being an island and the associative relationship with other designated and non-designated historic and archaeological assets within the area. The ZTV shows partial visibility of Thanet Extension WTGs, though views looking towards Thanet Extension WTGs and substation are screened by woodland and shelter planting in the wider landscape. Even within winter months this planting would preclude any views available.

7.12.78 Due to the screening provided by intervening planting and buildings, it is not anticipated that there would be sufficient visibility of any elements of Thanet Extension to give rise to any adverse effects and no further assessment of indirect effects is considered necessary.

**Effects arising from change to setting of Deal Middle Street Conservation Area, the Scheduled Artillery Castle (NHLE 1013380) and Selected Grade II Listed Buildings**

7.12.79 The Deal Middle Street Conservation Area is considered to be of Medium heritage significance, and the associated selected Grade II listed buildings (as set out in Table 7.9) and the scheduled Artillery Castle are all considered to be of High heritage significance as recognised by their designated status. Indirect effects upon these assets are considered in relation to Thanet Extension WTGs. Other elements of the proposed development would not be visible in views of or from the conservation area and would not contribute to any change to setting.

7.12.80 The conservation area's distinctive character is typified by the central axis of mainly Georgian terraced houses clustered around Middle Street; changing as the viewer moves towards Deal Castle, to grander Victorian villas (Dover District Council: <https://www.dover.gov.uk/Planning/Conservation/Conservation-Areas/Deal-Middle-Street.aspx>). It is within the outer portion of the conservation area that potential change in the setting of these assets is considered, due to the visual and associative connection to the sea. Further aspects of setting that provide a positive contribution to the heritage significance and setting of the asset group are the relationships between the individual heritage assets, the streetscape including its historic integrity and sense of intimacy through the narrow streets; and the associative relationships between the Deal, Walmer and Sandown Castles.

7.12.81 The scheduled Deal Artillery Castle (NHLE 1013380) is the largest of a group of three castles, the other two being located at Walmer, 2 km to the south and Sandown, 2 km to the north. It was built between 1539-40 by Henry VIII in order to protect the shallow, semi-sheltered anchorage between the Goodwin Sands and the coast known as the Downs. The castles of the Downs were built in the face of the political crisis and consequent fear of invasion occasioned by the King's divorce of Catherine of Aragon in 1533 and were financed from the proceeds raised by the Dissolution of the Monasteries. Deal Castle is built of Kentish ragstone, brick, and Caen stone reused from nearby disused religious houses. The monument incorporates a three-storeyed circular citadel, or tower, with six semi-circular, slightly lower towers projecting from its external face. The buildings, together with incorporating a High number of gun ports, were further protected by a stone-lined dry moat up to 20 m wide and 5 m deep, originally crossed on its western, landward side by a wooden drawbridge (Historic England NHLE text).

7.12.82 The setting of the individual assets and key views of and from these within the centre of the conservation area are largely provided by the buildings and their relationships to each other with sea views and associations with trade becoming more apparent on the eastern edge of the designated area. The views from the eastern edge of the conservation area appear to be split into two main groups due to the division of sea views provided by a pier that was constructed in the mid-20<sup>th</sup> century. Assets to the south of this have key views directly to the east out to sea, to the north along the urban aspect of the conservation area and enclosed by the pier to the east and to the south-east where France is visible on clearer days. The buildings to the north of the pier possess a more restricted range of views with the focus being directly out to the east.

#### *Assessment of construction phase*

7.12.83 Indirect effects on the heritage significance of the Deal Middle Street Conservation Area as a result of the WTGs construction over and above those presented by the completed array would be temporary and short-lived and as such would lead to a Negligible magnitude of change the effect of which would be **Not Significant** in terms of the EIA Regulations.

#### *Assessment of O&M phase*

7.12.84 Thanet Extension WTGs would be visible from this location on clearer days as very distant features, although how these are viewed would depend upon the location within the conservation area. The central axis of the conservation area and western extent will not be subject to views of Thanet Extension WTGs due to screening provided by neighbouring buildings and as such will not be affected by Thanet Extension.

7.12.85 From the buildings to the north of the pier Thanet Extension WTGs would appear as peripheral elements within key views out to the sea. These peripheral views would only be possible from individual assets where the buildings have been designed with bay windows which provide a broader field of view and in views from the Grade II listed Royal Hotel (NHLE 1363438) which has a loggia to the rear together with a seating area surrounding the ground floor which allows for a wider field of view. These selected views and the beach front areas would see Thanet Extension WTGs as very distant features, as illustrated in Figure 12.33 (Volume 2, Chapter 12: Seascape Landscape and Visual Impact Assessment (Document Ref: 6.2.12)), which would only be visible in good conditions, and would be seen, in most cases, through the strong vertical elements presented by the street lighting columns to the sea front. The buildings within this northern extent of the asset group, although being the closest to Thanet Extension WTGs are still at a distance of c. 22 km from the nearest proposed location.

7.12.86 The area to the south of the pier has key views looking north and south along the coast between Deal Castle (NHLE 1013380) and the listed K6 Telephone Kiosk (NHLE 1069756), as well as out to sea, particularly to the east and south-west where there is unobstructed views to France on clearer days. Views towards Deal Castle (NHLE 1013380) from the south also contribute to the significance of the conservation area. Thanet Extension WTGs would be largely screened by the pier in these views and although the eastern end of the array may continue beyond the end of this structure Thanet Extension WTGs would be visible at a distance of c. 23 km and only appear as very small and distant features on the horizon. The important aspect of setting here is the location in terms of the defence of Deal, and the availability of open seawards views. The contribution made by this setting is not harmed even where the turbines may be visible

7.12.87 With regards to Thanet Extension WTGs appearing in addition to the existing WTGs within the area, only the existing TOWF and the London Array Wind Farm could be visible from the Deal Middle Street Conservation Area with all others being screened from this location by intervening structures and/ or topography. If visible at all, the eastern extent of the London Array might be seen on very clear days and from the eastern edges of the conservation area. The London Array is also c. 39 km from the Deal Middle Street Conservation Area and as such it is unlikely that these will be discernible unless specifically looked for, even when appearing in the same field of view as the existing TOWF and Thanet Extension.

- 7.12.88 The addition of Thanet Extension to the existing TOWF would increase the field of view and the scale of WTGs in views out of the conservation area. Views of Thanet Extension and TOWF would be most notable from the shoreline to the north of the pier although they would also appear in views out from the south of the area and from the bastions of Deal Castle (NHLE 1013380). In views from the bastions of Deal Castle, the proposed WTGs would be visible through the street lighting columns and obliquely in views into which modern buildings have substantially encroached. Although the field of view and height would increase the composition of the two developments would appear more unified due to the distance from the assets.
- 7.12.89 Should the existing TOWF be decommissioned at the end of its use Thanet Extension would provide a more dispersed composition and the uniform height of the remaining WTGs means they would present a more harmonized appearance.
- 7.12.90 Vessels passing through this area closer to the coast consist of relatively small craft, comprising fishing and pleasure boats. Larger vessels traveling through the area further from the shore where views of the asset could be disrupted by Thanet Extension WTGs would see these views from a distance of over 25 km, at which distance the conservation area and the individual assets contained therein would be difficult to discern. Consequently, visibility of Thanet Extension WTGs in views from the sea would not contribute to any adverse effect.
- 7.12.91 Although Thanet Extension WTGs would be visible in some views of and from the Deal Middle Street Conservation Area, selected associated listed buildings as identified at Table 7.97.10.7 and from within the Artillery Castle (NHLE 1013380), they would appear as very distant features and only on clearer days and introduce a small increase in visibility compared to the assets' current setting. However, even where perceptible, there is no loss in the contribution that this setting makes to the significance of the assets within the Area, or to the Artillery Fort, and hence the magnitude of change is Negligible. The overall effect is therefore assessed and **Not Significant**.
- 7.12.92 No harm is found to occur to any of these assets. and there is no effect on the character and appearance of the Conservation Area.

*Assessment of decommissioning phase*

- 7.12.93 Decommissioning of the Thanet Extension WTGs would have the effect of restoring the current setting (all other circumstances remaining the same), and no significant effect is assessed to occur.

**Effects arising from change to setting of Dover Castle Grade I listed building and scheduled monument (NHLE 1070326 and 1019075)**

- 7.12.94 The Grade I listed Building of Dover Castle (NHLE 1070326) is also covered by the scheduled monument designation (NHLE 1019075). Dover Castle Keep is considered to hold High value for its archaeological, architectural, artistic and historic qualities together with less tangible associations with Britain's changing political and military relationship with France and the defence of Britain against invasion.
- 7.12.95 The views which contribute to this significance are primarily those looking south and east over the English Channel and those into the town, harbour and associated military establishments. Views to the north make a smaller contribution and do not relate directly to the principal heritage interests of the asset.
- 7.12.96 Visibility of Thanet Extension would be possible only from the top of the Keep, from which views northwards are available between the battlements. Where views to the north-east were possible no views of the sea in the direction of Thanet Extension were possible.
- 7.12.97 Shelter planting in the foreground, particularly along the A2 Dover Bypass, further screened longer views and presented a horizon which broken by trees. Other vertical structures include the Grade II\* listed transmitter towers (NHLE 1405535 and HER TR 34 SW 1087) that form part of the historic Swingate Chain Home Radar Station which form very prominent vertical elements in the middle ground of views north and north-east.

*Assessment of construction phase*

- 7.12.98 Indirect effects on the heritage significance of Dover Castle as a result of the WTGs construction over and above those presented by the completed array would be temporary and short-lived and as such would lead to a Negligible magnitude of change the effect of which is **Not Significant** in terms of the EIA Regulations.

*Assessment of O&M phase*

- 7.12.99 WTGs would be visible only on very clear days. In these views, the viewers' eyes would be drawn to the Swingate Chain Home Radar Station in the near distance. The WTGs would appear as small, very distant features against a broken horizon in a minor view from a single part of the asset as demonstrated by Figure 12.50 (Volume 2, Chapter 12: Seascape, Landscape and Visual Impact Assessment (Document Ref: 6.2.12)). The limited visibility of the proposed Thanet Extension WTGs would limit the magnitude of any change, meaning that the significance of Dover Castle would not be discernibly affected. There would be no visibility of Thanet Extension (either turbines or any other part of the proposed infrastructure) in views of Dover Castle from the approach to Dover Harbour by sea. Thanet Extension would have no effect on the significance of the Castle, an effect which is **Not Significant** and no harm is found.

*Assessment of decommissioning phase*

7.12.100 Decommissioning of the Thanet Extension WTGs would have the effect of restoring the current setting (all other circumstances remaining the same), and no significant effect is assessed to occur..

**Effects arising from change to setting of Dover Patrol Monument (War Memorial) and associated Railed Surround, Steps and Concrete Posts (NHLE 1070067)**

7.12.101 This structure is considered to be of more than special interest, reflected by its Grade II\* listing and as such is of High heritage significance. The building derives heritage significance from its historic interest as a poignant memorial of the tragic impact of world conflict and as a permanent testament to the sacrifice made by those individuals of The Dover Patrol who lost their lives in the WWI. It also derives heritage significance for its architectural design as an impressive example of a commemorative War Memorial, intact in its original coastal setting, designed in a stylised Egyptian manner by Sir Aston Webb. This asset also has value as part of a group due to the existence of identical monuments in France and the USA, and the associative links that this provides with these nations as allied forces (Historic England NHLE text). The potential indirect effects resulting from Thanet Extension WTGs are considered within this assessment.

7.12.102 The coastal location of this asset plays an important part of its setting due to it relating to the loss of life of those protecting the coast and the English Channel during the WWI. The tranquillity of the area in which the monument stands and the associative links to the English Channel which are enhanced by the visibility out to France also contribute to the setting and the heritage significance of this asset.

*Assessment of construction phase*

7.12.103 Indirect effects on the heritage significance of The Dover Patrol Monument as a result of the WTGs construction over and above those presented by the completed array would be temporary and short-lived and as such would lead to a Negligible magnitude of change the effect of which is **Not Significant**

*Assessment of O&M phase*

7.12.104 The closest proposed WTGs to The Dover Patrol Monument is located c. 29 km away and as such Thanet Extension WTGs could potentially appear as very small and distant features on the horizon, as shown in Figure 12.36 (Volume 2, Chapter 12: Seascape, Landscape and Visual Impact Assessment (Document Ref: 6.2.12)), and would only be visible on the clearest of days. Key views out from the monument are towards the south-east, away from Thanet Extension WTGs, looking out directly to sea and across to France.

7.12.105 With regards to Thanet Extension appearing in addition to the existing wind farms only the existing TOWF is considered as all others included within the baseline are screened in these views by the intervening land and/ or in the case of the London Array, too far away to be visible. From the distance involved the distinction between the existing TOWF and Thanet Extension array would be less noticeable although the increased width of Thanet Extension array and increase in height would make the development marginally more noticeable.

7.12.106 Should the existing TOWF be decommissioned at the end of its use Thanet Extension WTGs would provide a more dispersed composition and as such would have less definition as distant features on a horizon that is frequently indistinct and broken by planting.

7.12.107 This asset does have important associative relationships to the sea and visibility of this and as such views of the monument from the water are considered to be of importance. For Thanet Extension array to intervene within views of The Dover Patrol Monument from the sea it would be seen obliquely and at a distance of over 35 km. As such The Dover Patrol Monument would not be visible as a meaningful landmark within these views. Any distant views of the asset that might be available through the WTGs would not detract from the heritage significance of the asset.

7.12.108 Due to the distance between The Dover Patrol Monument and Thanet Extension, combined with it not appearing in key views of or from the asset, there is no potential for any significant loss of significance. Therefore it is considered that the proposed Thanet Extension WTGs would lead to, at worst, a Negligible magnitude of change the effect of which is **Not Significant** in terms of the EIA Regulations and no harm is found.

*Assessment of decommissioning phase*

7.12.109 Decommissioning of the Thanet Extension WTGs would have the effect of restoring the current setting (all other circumstances remaining the same), and no significant effect is assessed to occur..

**Effects arising from change to setting of Late Iron Age/ Romano-British site at Ebbsfleet Hill (HER MKE15319/ TR 36 SW 93)**

7.12.110 The KCC HER identifies this heritage asset as a Late Iron Age and Romano-British occupation site at Ebbsfleet Hill. The results of recent archaeological work on the area suggest the presence of remains of very early Roman military activity possibly associated with the Caesarian invasion of Britain (Fitzpatrick 2018), which would be of High heritage significance for historic and archaeological interests.



7.12.111 The current setting of this site incorporates views, many of which are heavily filtered and partially screened by shelter planting, over the wider area, including the modern industrial landscape at Richborough Port. This asset no longer has any visible above-ground remains, although the topographic location of the site contributes substantially to the assets understanding and heritage significance as an early settlement within what was once the banks of the Wantsum Channel. The associative and visual relationship with further Roman remains in the area including Richborough Castle (NHLE 1363256) and associated scheduled Saxon Shore Fort and Roman Port (NHLE 1014642) are also meaningful aspects of the current setting.

7.12.112 Indirect effects could also arise through the loss of archaeological remains or deposits which have the potential to contribute to an understanding of this heritage assets, while not actually forming a part of this. Examples could include deposits of geoarchaeological significance which inform an understanding of the form of the Stour Estuary at this time, or associated sites of contemporary occupation.

#### *Assessment of construction phase*

7.12.113 Indirect effects on the heritage significance of the remains at Ebbsfleet Hill as a result of visibility of elements of construction of the proposed substation, particularly at-height work including visibility of cranes, over and above those presented by the completed development, would be temporary and short-lived and as such would lead to a Negligible magnitude of change, the effect of which is Not Significant in terms of the EIA Regulations.

7.12.114 It is not anticipated that onshore works would give rise to the disturbance of archaeological remains or deposits of geoarchaeological significance associated with this heritage asset to the extent that any loss of archaeological interest would arise. The onshore works are located in an area which was within the mouth of the Stour Estuary at the time that the Ebbsfleet Hill site was occupied. Any associated deposits of geoarchaeological interest are anticipated to be too deeply buried to be affected by the onshore works (paragraph 7.11.20 above). Consequently, no adverse effect is anticipated to arise from disturbance of archaeological or geoarchaeological deposits as a result of the proposed onshore works (an effect considered to be **Not Significant**).

7.12.115 The limited visibility of the proposed substation construction and limited duration of these works, which would be seen beyond the existing industrial area, including the Richborough Connection substation and the Ramsgate Road Solar plant as well as the existing Weatherlees Hill sewage works, to the south and east of this asset means that the magnitude of any cumulative change would be very limited and no adverse cumulative effect would arise so no loss of significance of the asset is predicted; the potential effect is considered **Not Significant**.

#### *Assessment of O&M phase*

7.12.116 The location of the proposed substation on the east side of the A256 Ramsgate Road, means that the proposed substation would be screened by intervening, bunding, shelter belts and industrial development in views of or from the asset. The export and TJB cable bunds required for Option 2 would similarly be screened in views of and from this asset. Due to the screening/ heavy filtering provided by the shelter planting no adverse effects are anticipated. It is not anticipated that there would be sufficient visibility of Thanet Extension WTGs or export cable to give rise to any adverse effects and there is no potential for the significance the asset to be reduced, and no harm is found

7.12.117 The absence of visibility of the proposed substation means that it would not contribute to any adverse cumulative effect and no harm is found to occur.

#### *Assessment of decommissioning phase*

7.12.118 Decommissioning of the Thanet Extension WTGs would have the effect of restoring the current setting (all other circumstances remaining the same), and no significant effect is assessed to occur.

#### **Effects arising from change to setting of Kentlands and The Lodge at Sandwich Bay Estate (NHLE 1263915)**

7.12.119 This structure is considered to be of High heritage significance. The building derives heritage significance from its historic, architectural and artistic interest. Kentlands was commissioned in 1920 by prominent Tory MP Frederick Leverton Harris. He instructed the influential Arts and Crafts architect Charles H Biddulph-Pinchard, who constructed Kentlands with materials reclaimed from two 17th Century Dutch weavers' cottages and local Tudor barns (Strutt and Parker, 2016). The potential indirect effects resulting from Thanet Extension WTGs and the substation are considered within this assessment.

7.12.120 The current setting of this asset is clearly related to the coastal location and the association with further buildings at Sandwich Bay which together provide a sense of seclusion and privilege. Although views from within the setting of Kentlands would focus on views directly out to sea, the main building of this asset does face towards the north by north-east looking out towards Ramsgate and as such Thanet Extension WTGs may also be visible from views out of the structure itself. Views available from ground level beyond the perimeter of this building and its grounds but within the setting of the asset are illustrated within Figure 12.34 (Volume 2, Chapter 12: Seascape, Landscape and Visual Impact Assessment (Document Ref: 6.2.12)). Nevertheless, it is considered that it is the availability of views rather than specifically what is in view that is the relevant aspect of this component of the asset's setting.

*Assessment of construction phase*

7.12.121 Indirect effects on the heritage significance of Kentlands and The Lodge as a result of visibility of Thanet Extension WTGs and substation construction over and above those presented by the completed structures would be temporary and short-lived and as such would lead to a Negligible magnitude of change the effect of which is **Not Significant** in terms of the EIA Regulations.

*Assessment of O&M phase*

7.12.122 The substation would be located c. 4.8 km to the north-west of Kentlands and The Lodge. No windows within the structure face out directly towards the substation and as such any visibility would occur at ground level from within the asset's setting. At ground level the views available in close proximity to the asset looking towards the proposed substation are largely screened by the local topography and landscaping associated with Prince's Golf Club. If any visibility of the substation were available it would appear as a small and distant feature on the horizon alongside further industrial structures already present within the asset's setting and not within any key views. In any case, the ability to appreciate and understand the historic associations and the architectural detail in the fabric and design of the house is not affected, and do not rely on long range visibility for their significance.

7.12.123 The closest proposed WTGs to Kentlands and The Lodge is located c. 20 km away and as such Thanet Extension WTGs would potentially appear as distant features on the horizon. Views out of the building towards the north by north-east from the lower floors would be partially screened by the boundary hedge planted around the asset's plot although views from the upper floors would be unobstructed. When looking directly out the main field of view would be of the headland on which Ramsgate is located, with Thanet Extension WTGs appearing to the east of this on the edge of the view.

7.12.124 With regards to Thanet Extension appearing in addition to the existing wind farms only the existing TOWF and the Richborough WTG are considered as all others included within the baseline are screened in views towards Thanet Extension by the intervening land. Due to the distance involved, TOWF would appear as very small and distant and would be set behind Thanet Extension WTGs. In the field of view in which TOWF is visible, Thanet Extension WTGs, although greater in scale, would appear in keeping with the current setting with the TOWF in the background providing a sense or greater cohesion to the array. Thanet Extension WTGs to either side of the combined array could, however, appear as outliers that would distract the eye and the combined array could reduce the separation of the combined array from the Ramsgate headland. The combination of the existing and proposed Thanet WTGs would not be seen within the same arc of view as the Richborough WTG. It is considered that it is the availability of seawards views as part of setting that contribute to the significance of the asset, not what is in the views. In any case, the distance at which the WTGs may be visible is so great that no loss of significance is predicted.

7.12.125 This asset, although having key views out to sea, was not designed to be viewed from the sea. Any distant views to the asset that might be available through the WTGs, would be from at least 20 km away and would not detract from the heritage significance of the asset.

7.12.126 Due to the distance between Kentlands and The Lodge and the proposed substation together with the potential screening and current setting it is considered that the proposed substation would not lead to any discernible adverse effect.

7.12.127 The proposed Thanet Extension WTGs could present a discernible change to the nature of the setting, although this would not discernibly affect the buildings' historical relationship with the coastline or the settlement at Sandwich Bay, nor would it present any change to architectural interest of the building and no loss of significance is predicted. Consequently, there is a Negligible magnitude of change, the effect of which is **Not Significant** in terms of the EIA Regulations, and no harm is found.

*Assessment of decommissioning phase*

7.12.128 Decommissioning of the Thanet Extension WTGs would have the effect of restoring the current setting (all other circumstances remaining the same), and no significant effect is assessed to occur..

**Effects arising from change to setting of Kingsgate Conservation Area and Selected Listed Buildings including the Remains of Neptune's Temple (NHLE 1239838)**

7.12.129 The Kingsgate Conservation Area is considered to be of Medium heritage significance and individual designated heritage assets within it are considered to be of High heritage significance. Indirect effects upon these assets are considered in relation to Thanet Extension WTGs alone. Other elements of Thanet Extension would not be visible in views of or from the conservation area and would not result in any change to the setting of the group or individual assets contained.

7.12.130 The conservation area appears to be divided when moving through the designation. The inland part of the conservation area is largely enclosed by planting, while the coastal area on the clifftops at North Foreland is more open, with views across land on either side of Kingsgate Bay. Views out to sea from the coastal locations are important to the setting of the conservation area with views from accessible elements of the conservation area appearing to focus more on views looking north-west and south-east across the bay and towards seafront listed buildings. Views out to sea from the inland elements of the conservation area are screened by woodland. Views to sea, in which Thanet Extension would be visible, contribute to historic and architectural interest of the individual structures such as Holland End Holland House and Little Holland House (NHLE 1273614) and Kingsgate Castle (NHLE 1239636). The bay itself at the base of the cliffs is not included within the designated area, and neither are the remains of Neptune's Temple (NHLE 1239838) although these also contribute to the heritage significance of this asset group.

- 7.12.131 The former Port Regis School (NHLE 1239262) and its grounds to the north-west of the house form a discrete area within the Conservation Area, with relatively few views in or out, except for some views to the sea from the north-east front of the school, particularly from upper storey windows.
- 7.12.132 The Captain Digby Inn (NHLE 1239637) is listed at Grade II and is significant for its architectural interest and historical associations. It incorporates part of Bede House, and late 18<sup>th</sup> century house of entertainment, which serviced visitors to Lord Holland's follies. The majority of the current structure is 19<sup>th</sup> century, with modern additions to the rear. Its significance derives from its architectural interest, as well as from its historic association with both Lord Holland and Captain Digby (who commanded HMS Africa at Trafalgar). The building is currently in use as a public house. Its setting is related to the bay it over looks and with a principal view facing towards south-east towards Kingsgate Castle, and incorporates Holland House and its companions on the landward side of the bay.
- 7.12.133 Little Holland House, Holland House and Holland End (NHLE 1273614, Grade II) form a group not in residential use, on the south-eastern side of Kingsgate Bay Road, which separates them from the bay itself. The buildings were part of a larger residence built by the first Lord Holland in the mid-18<sup>th</sup> Century, and later rebuilt in the mid -19<sup>th</sup> Century. The original portico was removed from site, and the surviving structures have some modern additions. Their significance lies primarily in their architectural interest, the detail of which is best appreciated in close proximity. They have additional significance for their association with Lord Holland, and their relationship with the Captain Digby Inn (which provided entertainment for visitors to Lord Holland's follies) and Kingsgate Castle, also built for Lord Holland. Their setting includes both of these structures, as well as views out to sea across the bay.
- 7.12.134 Kingsgate Castle (NHLE 1239636, Grade II) was originally built as stables for Lord Holland in 1760, in the form of a copy of a Welsh Edwardian castle, but fell into ruin. The round tower is all that remains of this building. The current buildings were erected in the later 19<sup>th</sup> century by Lord Avebury around a quadrangle. Its significance lies in its architectural and historic interest, and its setting includes the bay and the buildings referred to above. Its north-west facing elevation looks over the bay towards the Captain Digby Inn. Its north-eastern face looks out to sea and include views towards the Thanet Offshore Wind Farm.
- 7.12.135 TOWF is visible from the seafront and the clifftop at Kingsgate, where it forms a discrete element of sea views, and is understood by the viewer as a distant (over 10 km) offshore development.

#### *Assessment of construction phase*

- 7.12.136 Indirect effects on the heritage significance of the Kingsgate Conservation Area asset group as a result of the WTGs construction over and above those presented by the completed array would be temporary and short-lived and as such would lead to a Negligible magnitude of change the effect of which is **Not Significant** in terms of the EIA Regulations.

#### *Assessment of O&M phase*

- 7.12.137 Thanet Extension WTGs would be visible as peripheral elements in views looking across the bay towards the Captain Digby Inn (NHLE 1239637) and the Remains of Neptune's Temple (NHLE 1239838) from Kingsgate Castle (NHLE 1239636). These assets mimic the design of one another and as such their relationship to each other and views between them make an important contribution to their architectural interest. Views looking out directly towards Thanet Extension WTGs from the individual listed buildings would be predominantly unobstructed.
- 7.12.138 The closest WTGs to the Kingsgate Conservation Area would be sited c. 8 km from the eastern extent of the designation. As such although there would be increased visibility of WTGs at a larger scale than at present, but they would still appear as distant elements of views out to sea and would not be incongruous with the current setting of the asset. The amendments to the offshore Red Line Boundary would result in the WTGs at the northern end of the array appearing discernibly more distant and less prominent than in the layout presented at PEIR. Thanet Extension WTGs would occupy an increased field of view than at present and would be of a discernibly larger scale in views directly out from Holland End, Holland House and Little Holland House (NHLE 1273614) as shown within Figure 12.30 (Volume 2, Chapter 12: Seascape, Landscape and Visual Impact Assessment (Document Ref: 6.2.12)). This increased visibility would be more noticeable in views across the bay, although the proposed WTGs would remain peripheral to the reciprocal views between Kingsgate Castle, the Captain Digby Inn and the Remains of Neptune's Temple. Thanet Extension WTGs would also appear in views of the Remains of Neptune's Temple (NHLE 1239838) as a backdrop to this asset when looking out to sea from the footpaths and golf course on the north side of Kingsgate Bay.
- 7.12.139 The proposed WTGs would be visible from the north-east front of the former Port Regis School (NHLE 1239262), where they would appear as relatively distant elements of the background to views to sea over Kingsgate Bay, but would be screened in views from Hackemdown Tower (NHLE 1239264) and the King's Gate (NHLE 1239439). Where visible, Thanet Extension WTGs would occupy an increased field of view and would be of a discernibly larger scale than the existing WTGs

- 7.12.140 With regards to Thanet Extension appearing in addition to the existing wind farms only TOWF and London Array are potentially visible from the Kingsgate Conservation Area as all others are screened by the intervening topography and/ or planting and structures within this. Visibility of WTGs is most notable in the open areas on the coastal fringes of the conservation area and particularly from the headlands on either side of the bay.
- 7.12.141 The addition of Thanet Extension to TOWF would increase the field of view occupied by WTGs and give rise to differences in the scale of WTGs, the disruption of the existing grid pattern, stacking and potential overlapping of WTGs.
- 7.12.142 The London Array would only be visible in views from the headlands on either side of the bay and when looking out towards the development and as such would only be visible in the same field of view as Thanet Extension WTGs in views from locations which do not contribute to the significance of the heritage assets with the possible exception of some views of the Captain Digby Inn (NHLE 1239637) and the Remains of Neptune's Temple (NHLE 1239838) from elevated parts of Kingsgate Castle (NHLE 1239636). Vessels passing through this area closer to the coast consist of relatively small craft, comprising fishing and pleasure boats. Longer views of the assets, experienced from larger vessels traveling through the area further from the shore would be from a distance of over 13 km, at which distance the conservation area and the individual assets contained therein would be difficult to discern. Consequently, visibility of Thanet Extension WTGs in views from the sea would not contribute to any adverse effects.
- 7.12.143 There is a change in setting in that, the proposed Thanet Extension WTGs would appear with greater prominence in and increase the field of view currently occupied by TOWF, in views of the bay when looking out from Holland End, Holland House and Little Holland House (NHLE 1273614). These views are constrained by the cliffs to either end of Kingsgate Bay, and limited by the presence of the Captain Digby Public House and Kingsgate Castle. It is the availability of this open sea view over the bay that is important, and not specifically what is in that view at distance (beyond the bay). The contribution that the setting (as described in 7.12.130 and following) makes to the significance of the properties is not considered to be reduced. The visual relationship with the bay, and with the Inn and Castle would not be affected by the increased presence and prominence of turbines. In views directly across the bay from the frontage of these properties. The ability to appreciate and understand this relationship and the historic association with Lord Holland would not be jeopardised. The ability to appreciate the architectural interest in the properties, in respect of their detail and fabric is not harmed. As there is no reduction in the contribution that setting makes to the significance of the building (an effect of negligible magnitude) and no loss of significance, the overall is assessed as **Not Significant**.
- 7.12.144 Accessible views of and from the Captain Digby Inn (NHLE 1239637) are predominantly from very close distances, along the B2052 Kingsgate Bay Road, from which Thanet Extension would not be clearly discernible, and it has been designed to face southwards to Kingsgate Castle and out to sea, with extremely limited fenestration to the north-west, north-east and south-west elevations. Consequently, views from the asset which contribute to its historic associations and place it within a specific designed composition would not be affected by visibility of Thanet Extension. Thanet Extension would, however, appear as a peripheral element in views of The Captain Digby Inn from Kingsgate Castle, but this would not reduce the contribution made its setting, nor affect any of the interests from which its significance is derived. The effect is therefore negligible in magnitude and the overall effect is assessed as **Not Significant**.
- 7.12.145 Thanet Extension would be prominently visible in views from the Remains of Neptune's Temple (NHLE 1239838), although in these views, they would be understood by the viewer as a discrete offshore development. Thanet Extension would also appear in views of the Remains of Neptune's Temple from Kingsgate Castle, although not in direct juxtaposition, and the significance of the asset in terms of its architectural interest and historic association is not affected. It will still be read in the same way, as a folly with a coastal backdrop, which affords extensive sea views. As there is no reduction in the contribution of the setting to significance, and the interests from which its significance is derived and not harmed, the potential effect is assessed as negligible, and the overall affect is considered to be **Not Significant**.
- 7.12.146 Similarly, Thanet Extension would be prominently visible as a discrete offshore development in views from the Remains of the Lookout in grounds of Castle Keep Hotel (NHLE 1273558). Thanet Extension would appear in views of this asset from the modern flats to the west, although the relative proximity of the viewer in these views means that the architectural and historic interest would still be readily apparent. Whilst views from this location would include more (and closer) turbines, the proposed Development does not preclude the availability of sea views, and it is this availability that is important to the setting of this asset. As there is no change in the contribution that setting makes to the significance of the asset (an effect of negligible magnitude), and no consequent loss of overall significance, the potential impacts is assessed as **Not Significant**.
- 7.12.147 Visibility of Thanet Extension WTGs in views from the former Port Regis School would be largely incidental to any appreciation of its archaeological and historic interests, which relate primarily to the designed setting afforded by the landscaped grounds in which it sits. The longer views to the sea contribute primarily to a more generalised sense of place than any specific designed vista or specific historic association. There is no change in the contribution to significance made by the setting of this asset, and the heritage interest from which this significance is derived are not affected, not is the ability to appreciate or understand that significance. The potential effect is therefore negligible in magnitude and this is assessed as **Not Significant**.

7.12.148 Views of Kingsgate Castle are from the north side of Kingsgate Bay or in very close proximity to the asset from the south and west, meaning that Thanet Extension would be visible in sequential views as the viewer scans the horizon. However, it will not compete with the prominence of the castle on its headland. Whilst the Thanet Extension would be visible from all floors of the castle in views out to sea, it is the availability of the sea view (not what is specifically in it) that is important. Views across the bay towards the Captain Digby Inn and the Holland House properties on the landward side of the bay, may include the WTGs in the periphery, but their presence will not affect the interrelationship of the Castle with these historically associated properties. The architectural interest in the castle and its historic value will not be affected, nor will the ability to appreciate these aspects of its significance be reduced. As the contribution of setting to the significance of the castle is not reduced, and consequently its significance is not diminished, an effect of negligible magnitude is predicted, the effect of which is **Not Significant**.

7.12.149 The effect on the Kingsgate Conservation Area would be limited to the seaward edge of the Area where the views to sea are available and in which the Extension would appear as a discrete offshore development. Such views, although important, are not considered defining contributors to the Area's significance as a whole. Views towards Thanet Extension from and across the majority of the conservation area around Holland Close and the former Port Regis School would be precluded by intervening planting and buildings. Whilst Thanet Extension would appear as a discrete offshore element in views from the non-designated buildings on the clifftop south of Kingsgate Castle where they are not limited by intervening buildings and planting, it is considered that this does not significantly affect the character and appearance of the Area. The magnitude of the effect is considered to be negligible and the overall effect on the significance of the Area is assessed as **Not Significant**.

7.12.150 No harm has been identified to occur to the significance of the Conservation Area, nor any of the assets within it.

#### *Assessment of decommissioning phase*

7.12.151 Decommissioning of the Thanet Extension WTGs would have the effect of restoring the current setting (all other circumstances remaining the same), and no significant effect is assessed to occur.

#### **Effects arising from change to setting of Margate Conservation Area and Selected Grade II Listed Buildings**

7.12.152 The Margate Conservation Area is considered to be of Medium heritage significance and the associated Grade II listed buildings are considered to be of High heritage significance for architectural and historic interest and through their association with the mid-19th to late-20th century fashion for day trips and holidays to seaside resorts.

7.12.153 The Margate Conservation Area as a whole has a diverse feel with what appears to be a number of different character areas including the green spaces to the east, the old town, harbour and the beachside elements. Views of and from the majority of this conservation area in relation to Thanet Extension WTGs are screened by further structures and most of the individual designated assets contained within do not have views looking towards Thanet Extension WTGs. The exceptions to this have been included within the asset group and consist of Grade II listed structures within the north-eastern extent of the designated area together with the Former 'Man Of Kent' Temperance Hotel (NHLE 1395803) which looks out across the conservation area from the upper floors. Views out of the area to the west of the Stone Pier (NHLE 1260334) are largely screened by this structure and the neighbouring buildings and Thanet Extension WTGs are not expected to impact upon the beachside area of the conservation area. From the eastern extent of the designated area that is the focal point of this assessment, views out to sea make an important contribution to the setting of the asset group and add to its heritage significance.

7.12.154 Indirect effects upon the Margate Conservation Area and selected Grade II listed buildings are considered in relation to Thanet Extension WTGs alone. Other elements of Thanet Extension would not be visible in views of or from the conservation area and would not contribute to any change to setting.

#### *Assessment of construction phase*

7.12.155 Indirect effects on the heritage significance of the Margate Conservation Area asset group as a result of visibility of the WTGs construction over and above those presented by the completed array would be temporary and short-lived and as such would lead to a Negligible magnitude of change the effect of which would be **Not Significant** in terms of the EIA Regulations.

*Assessment of O&M phase*

7.12.156 The proposed WTGs would not be visible in views from the majority of the conservation area or the majority of the listed buildings within it as views would be precluded by intervening buildings. Thanet Extension WTGs would appear in views across the eastern extent of the conservation area in views looking out across the green spaces on the clifftop at Fort Parade which form contributing elements to the architectural interest of the assets and allow the historic development of the town and its associations with past leisure activities to be appreciated. WTGs would potentially appear as peripheral elements within views to sea from some listed buildings, such as Paragon Court (NHLE 1088960). WTGs would be visible in views of Paragon Court from the west, although viewpoints from where simultaneous views are available are all close to the asset and the relative prominence of the WTGs would be reduced. The closest WTGs would be situated c. 10.5 km from the designated area. Views available from the conservation area are mainly along the clifftop to the east of the harbour where WTGs would appear as distant features on the sea horizon leading out from the clifftop on which the conservation area is located. In these views, the closest WTGs visible would be located further from the viewer than in the layout considered at PEIR as a result of the change to the offshore Red Line Boundary, consequently appearing with discernibly reduced prominence.

7.12.157 Thanet Extension WTGs would also appear in views from the Stone Pier (NHLE 1260334) looking towards the east across the more modern elements of the shorefront at the Rendezvous which are not included within the conservation area (Figure 12.29, Volume 2, Chapter 12: Seascape, Landscape and Visual Impact Assessment (Document Ref: 6.2.12)). Views of Thanet Extension from within the wider area would be very limited with the exception of possible views available from the upper floors of the Former 'Man Of Kent' Temperance Hotel (NHLE 1395803) which stands significantly taller than the surrounding structures and has windows looking out in the direction of Thanet Extension WTGs. WTGs would be perceived as distant features within a much wider panorama beyond the intervening townscape in views from these upper storeys.

7.12.158 WTGs may be visible beyond Margate in some longer views from the west, around Westgate on Sea (Figures 12.28 and 12.41 in Volume 2, Chapter 12: Seascape, Landscape and Visual Impact Assessment (Document Ref: 6.2.12)). In these views, some of the proposed WTGs would be visible behind the town, although the majority of the array would be visible to seaward, and the WTG elements visible behind the Margate skyline would be read by the viewer as part of the offshore wind farm rather than as an onshore feature. While WTGs would be juxtaposed with the buildings within Margate in these views, the separation of the viewer from these assets means that the architectural interest of these buildings cannot be readily appreciated either individually or in terms of their interrelationships within the settlement. The principal contributions of these views to architectural and historic interest derives from the visible relationship of buildings along the eastern side of Margate Bay with the harbour, and the juxtaposition of individual buildings at different levels along the seafront to the east side of Margate Bay, although in views from the west in which the WTGs would also appear, the distance of the viewer from these buildings is such that the contribution of these views to the significance of the conservation area is limited. Margate, in common with many seafront towns, does not have a particularly distinctive skyline, with relatively few taller buildings, which include Arlington House, which is visually the most prominent tall building in these views, the spire of St John's Church and the Ferris Wheel at Dreamland as well as the towers of the churches of Saints Michael and Bishoy and Saint Paul, none of which are located within the conservation area assessed here. These taller buildings punctuate the skyline in front of and behind the conservation area, providing a sense of the relationship of the seafront conservation area to a wider settlement, which would be little affected by the visibility of the proposed WTGs.

7.12.159 In these views from the west of the conservation area, the amended offshore Red Line Boundary would mean WTGs visible to the north of Margate would appear further from the viewer and would be more coherently grouped. This would present a slightly reduced magnitude of change in setting to the array considered at PEIR.

7.12.160 The presence of the existing TOWF and other wind farm arrays means that the Thanet Extension WTGs would not be incongruous to the current setting. The addition of Thanet Extension WTGs to TOWF, however, would increase the field of view occupied by WTGs and present differences in the scale of WTGs between proposed and existing arrays, by disrupting of the existing grid pattern, and introducing stacking and overlapping of WTGs.

7.12.161 The London Array, KF, KFE, GS, GSE and GSD OWFs would all be visible from the conservation area, with London Array, GS, GSE and GSD potentially appearing in the same field of view as TOWF and Thanet Extension. Where the wind farms would appear in the same views the existing contrast in heights and composition due to the distances of each development and as such would provide a more forgiving setting for the addition of the proposed WTGs to TOWF.

- 7.12.162 Should the existing TOWF be decommissioned at the end of its use Thanet Extension would provide a more dispersed composition would present a more harmonized appearance.
- 7.12.163 Margate harbour is used primarily by relatively small craft, comprising fishing and pleasure boats. These craft primarily travel close to the coast, and the proposed wind farm would not intervene in views of the conservation area from the majority of marine traffic accessing the harbour. Larger vessels travel through the area further from the shore but views available from these assets in which Thanet Extension WTGs could intervene would be from a distance of over 15 km, at which separation it would be difficult to discern the location of the conservation area. Consequently, visibility of Thanet Extension WTGs in views from the sea would not contribute to any adverse effect on the Margate Conservation Area.
- 7.12.164 The increased scale of Thanet Extension WTGs would mean that they would be visible over land in some views of towards the Conservation Area from its west (see Figure 12.28 (Volume 2, Chapter 12: Seascape, Landscape and Visual Impact Assessment (Document Ref: 6.2.12)). However, the special interest in the area and in the listed assets that contribute to its significance is not readily apparent at this range. The WTGs blade tips appear above or at a similar height to the skyline of the town in this view and some turbine blades can be seen cutting across the roofline behind the town. These turbine swill be understood it the context of the wider TEOF scheme as it extends to the north and out to sea in that view.
- 7.12.165 The change to the Red Line boundary would result in a smaller change to the setting of the Margate Conservation Area than the layouts considered at PEIR. The special interest in and character an appearance of the Margate Conservation Area is not considered to be affected by the minor change in setting that the Thanet Extension WTGs represent, even where these are visible above the area in long views towards the town from the west, or in views along the coast from the eastern edge of the area (the effect on the Clifftop conservation area is assessed elsewhere in this Chapter).
- 7.12.166 AS the contribution of the setting to the significance of the area is not affected, and the significance of the area not changed, the potential effect is considered to be negligible in magnitude and the overall effect is assessed as **Not Significant** (and no harm is identified).

- 7.12.167 Effects on individual listed buildings would generally be of a negligible magnitude, particularly where Thanet Extension WTGs would appear only as peripheral elements in views to sea from these structures. The setting of the majority of these buildings is defined by their place within the conservation area, and within the town of Margate, and their immediately streetscape surroundings. Those with a more coastal aspect have a wider setting, but this is generally related to how they are understood in relation to the growth of the town as a resort and holiday destination. Where buildings face out to sea, it is the availability of views over the coast and the sea beyond that are important, rather than what is present in that view. Generally, such buildings (in the eastern part of the area) face north and their associations are with the promenades and the space around the Winter Gardens. Paragon Court is an exception, in that its principal elevation faces west, albeit there is some visibility to the east from the rear of these structures.
- 7.12.168 The architectural interest and historic associations of these buildings are unaffected by the Development, and its addition to the current setting causes no reduction in the contribution the setting makes to the significance of any of the listed assets within Margate. All continue to be read in the context of a developing seaside town, and their individual architectural and historic interest are still readily appreciable. As no reduction in the significance of any asset is found, the potential effect is considered to be of a Negligible magnitude, the effect of which is **Not Significant**.
- 7.12.169 No harm is found and the Listed Buildings are considered to be preserved in an appropriate setting.

#### *Assessment of decommissioning phase*

Decommissioning of the Thanet Extension WTGs would have the effect of restoring the current setting (all other circumstances remaining the same), and no significant effect is assessed to occur.

#### **Effects arising from change to setting of Margate Seafront Conservation Area**

- 7.12.170 The Margate Seafront Conservation Area is considered to be of Moderate heritage significance for architectural and historic interest and through its association with the mid-19th to late-20th century fashion for day trips and holidays to seaside resorts.
- 7.12.171 The Margate Seafront Conservation Area comprises the north-facing elements of the Margate Seafront, While the buildings within it are primarily of 19<sup>th</sup>-century date, the modern road layout and the presence of substantial modern structures, including Arlington House and the Dreamland theme park, which are located adjacent to the conservation area, give it a more open and varied appearance than Margate Conservation Area. Views from this area are focused northwards into the Thames Approaches and in either direction along the seafront.

7.12.172 Indirect effects upon the Margate Seafront Conservation Area and selected Grade II listed buildings are considered in relation to Thanet Extension WTGs alone. Other elements of Thanet Extension would not be visible in views of or from the conservation area and would not contribute to any change to setting.

*Assessment of construction phase*

7.12.173 Indirect effects on the heritage significance of the Margate Seafront Conservation Area as a result of visibility of the WTGs construction, over and above those presented by the completed array, would be temporary and short-lived and as such would lead to a Negligible magnitude of change the effect of which is Not Significant in terms of the EIA Regulations.

*Assessment of O&M phase*

7.12.174 The proposed WTGs would not be visible in views from the majority of the conservation area or the listed buildings within it as views would be precluded by intervening buildings. Partial views of Thanet Extension WTGs may appear in views from the extreme western end of the conservation area, on the seafront to the north of Sea View Terrace, but in these views, the WTGs, where visible, would be all but screened by the intervening buildings in Margate.

7.12.175 As at Margate, WTGs may be visible beyond Margate Seafront in some longer views from the west, around Westgate on Sea (Figures 12.28 and 12.41 in Volume 2, Chapter 12: Seascape, Landscape and Visual Impact Assessment (Document Ref: 6.2.12)). In these views, some of the proposed WTGs would be visible behind Margate, but Margate Seafront would be seen obliquely and is not a distinct visual element of these views.

7.12.176 The presence of the existing TOWF, and other wind farm arrays, means that Thanet Extension WTGs would not be incongruous to the current setting. London Array, KF, KFE, GS, GSE and GSD OWFs would all be visible from the conservation area.

7.12.177 Should the existing TOWF be decommissioned at the end of its use, Thanet Extension would provide a more dispersed composition, and would present a more harmonized appearance as a result of the consistency in the scale of WTGs.

7.12.178 The proposed WTGs would not intervene in any views of Margate Seafront Conservation Area from the sea and there is no potential for any reduction in the contribution that the setting makes to the significance of any asset within the Area, or to the Area itself. The character and appearance of the area is considered to be unchanged

7.12.179 It is considered that visibility of Thanet Extension WTGs would have an effect of Negligible magnitude the of effect which on the heritage significance of the Margate Seafront Conservation Area, the effect of which is assessed considered to be **Not Significant** (and no harm is identified).

*Assessment of decommissioning phase*

7.12.180 Decommissioning of the Thanet Extension WTGs would have the effect of restoring the current setting (all other circumstances remaining the same), and no significant effect is assessed to occur.

**Effects arising from change to setting of North Foreland Lighthouse including attached Lighthouse Keepers Houses (Grade II Listed, NHLE 1222802)**

7.12.181 This structure is considered to be of s High heritage significance, which is reflected in its Grade II listing. The building derives heritage significance from its historic, architectural and associative interest with connections to both South Foreland Lighthouse (NHLE 1101512) and the Kingsgate Conservation Area. The potential indirect effects resulting from Thanet Extension WTGs are considered within this assessment as other elements of Thanet Extension would not be visible to a level that would impact upon the setting of the asset.

7.12.182 North Foreland occupies a site that has provided a beacon since the turn of the 16th century as recorded by a deed dating from 1499 which refers to ‘*Ye beacon that lyith at ye hedde of ye cliffe at Beecon Hill*’. This early light consisted of a c. 6 m wooden post which provided a pivot to a further pole at one end of which was an iron basket containing wood and pitch. The earliest element of the lighthouse that stands on the headland today was constructed in 1691 and then consisted of a brick, stone and flint two-storey high octagonal tower, the height of which can still be seen by a circle of stonework that protrudes half way up the current structure. In 1715 the licence for the lighthouse passed into the ownership of the Greenwich Hospital and between 1790-1793 they added a further two brick and stone storeys and the open fire at the top was changed to an oil lamp. The form of the lighthouse that we see today has stood since 1860 with the only further changes being interior adjustments such as the conversion to electricity in 1920 (Major, 2000).

7.12.183 Its significance lies in its architectural interest and its historical association, particularly with the need to provide a beacon and light on this headland, and in its consequent association with shipping and navigation. Its setting is the headland on which it stands and the lighthouse keepers cottage, and extends across the sea in all directions, and includes association with South Foreland.

*Assessment of construction phase*

7.12.184 Indirect effects on the heritage significance of the North Foreland Lighthouse as a result of visibility of the WTGs and substation construction over and above those presented by the completed structures would be temporary and short-lived and as such would lead to a Negligible magnitude of change the effect of which would be **Not Significant** in terms of the EIA Regulations.



*Assessment of O&M phase*

- 7.12.185 The closest proposed WTGs to the North Foreland Lighthouse is located c. 9 km away and as such Thanet Extension WTGs could potentially appear as a clearly discernible element within the asset's setting. Views from the ground floor and surrounding grounds are partially screened from Thanet Extension WTGs by housing and shelter planting now present on the opposite side of the road to the lighthouse. Views available from the upper levels of the lighthouse and Lighthouse Keepers' Houses would, however, look out over the top of these landscape elements to Thanet Extension WTGs beyond, although as the lighthouse was constructed to aid navigation of the Goodwin Sands to the south-east any effect on significance would be limited. The visibility available from the upper floors of the lighthouse is a function of the design to ensure clear visibility of the light from the sea as opposed to views out from the asset, but the connection to the water and coastline are important aspects of the assets setting. The presence of Thanet Extension in these views would increase visibility of WTGs at a larger scale than those already present in the assets setting, although they would still appear as distant aspects of these views out to sea.
- 7.12.186 With regards to Thanet Extension appearing in addition to the existing wind farms only the existing TOWF, London Array, GS, GSE and GSD OWFs together with the Richborough WTG have been considered as the KF and KFE OWFs are screened by the intervening land. The addition of Thanet Extension to the existing TOWF would increase the field of view occupied by WTGs and introduce differences in the scale of WTGs, disrupting the existing grid pattern.
- 7.12.187 The Richborough WTG is located in views away from the coast and as such not within more sensitive aspects of the Lighthouse's setting. This would also appear in separate views to the other wind farms.
- 7.12.188 Should the existing TOWF be decommissioned at the end of its use Thanet Extension WTGs would present a more dispersed and coherent composition.
- 7.12.189 Vessels passing through this area closer to the coast consist of relatively small craft, comprising fishing and pleasure boats. Larger vessels traveling through the area further from the shore where views of the asset could be disrupted by Thanet Extension WTGs would see these views from a distance of over 14 km, at which distance the landmark nature of the asset would be reduced during the day. These WTGs, although potentially disrupting visibility of the light at night, would not screen it and during these times the structure itself would not be visible. Consequently, visibility of Thanet Extension WTGs in views from the sea would not contribute to any adverse effect.

7.12.190 Despite the increased scale and proximity of WTGs in views to sea from the Lighthouse, it is not considered that this change in setting affects the significance of the structures. Its purpose as a navigation aid (and one primarily used at night) is still readily appreciable. The availability of long views and a prominent location is the key driver here, not what is in view. The architectural detail of the lighthouse and the keeper's cottage (and their relationship to each other) is best appreciated in close proximity and this is not changed. The relationship with South Foreland is similarly not changed.

7.12.191 As there is no reduction in the contribution that the setting makes to the significance of this asset, the potential for an impact is assessed as Negligible, and the overall effect is assessed as **Not Significant**. This listed building continues to be preserved in an appropriate setting and its significance is not harmed.

*Assessment of decommissioning phase*

7.12.192 Decommissioning of the Thanet Extension WTGs would have the effect of restoring the current setting (all other circumstances remaining the same), and no significant effect is assessed to occur.

**Effects arising from change to setting of Pegwell Bay WWII Anti-Invasion Defences (Grade II Listed, NHLE 1413803)**

7.12.193 This asset is considered to be of High heritage significance for its historic and archaeological interest, and this is reflected in its Listing. The entry relates to a group of three assets consisting of anti-tank pimples, anti-tank cylinders and a pillbox all within the area. Only the anti-tank cylinders are considered to be at risk of indirect effect arising from visibility of the proposed WTGs and substation, although the pillbox and 'pimples' could also be affected indirectly by construction of the onshore cable route.

7.12.194 These assets have heritage significance for their historic value with many aspects contributing to their heritage significance and setting including their topographical and spatial location, the materials used which reflects the improvisation of the period, their views out to the coast, their continued presence as a boundary when moving through the landscape and their rarity, particularly relating to the anti-tank cylinders.

7.12.195 There are thought to be a series of around 300 anti-tank cylinders in this area, constructed c.1940 in response to the threat of invasion in the early years of WWII as part of what General Ironside termed the 'Coastal Crust' designed to delay invaders. The cylinders comprise a single line of concrete cylinders (probably utilising civilian drainage pipes) approximately 1 m high. They roughly follow the line of the Boarded Groin (HER MKE76084/ TR 36 SW 203), to the edge of the playing fields just north of the banks of the River Stour. Many of the dome-topped cylinders retain the steel fixing for barbed wire set into the top (Historic England NHLE text).

*Assessment of construction phase*

7.12.196 Indirect effects on the heritage significance of the anti-tank cylinders, pillbox and 'pimples' as a result of visibility of the cable, WTGs and substation construction over and above those presented by the completed structures, while potentially prominently visible, would be temporary and short-lived and as such would lead to a Negligible magnitude the effect of which is **Not Significant** in terms of the EIA Regulations.

*Assessment of O&M phase*

7.12.197 The surface lain cable route required for Option 2 will predominantly be visible as a low chalk covered mound. This mound would be sufficiently far from the designated 'pimples' to the north of the former landfill, but could come within approximately 100 m of the listed pillbox and the line of anti-tank cylinders. There is at present no direct intervisibility between individual elements of this listing, as a result of a modern hedgelines and planting, and modern fences provide a tangible separation. Any additional sense of separation provided by the mounding over the TJB and cables in Option 2, and would consequently present only a small incremental increase. As a result it is considered that the change in setting presented by the operation of the majority of the cable route would not result in any reduction in the contribution made by the current setting to the asset's significance. This is an effect of Negligible magnitude of upon the anti-tank features and associated pillbox and this is considered to be **Not Significant** in terms of the EIA Regulations.

7.12.198 The retention or restoration of the existing screening planting in the hedge to Sandwich Road and within the Country Park would preclude any additional potential indirect effects on the pillbox, and as a result there is no potential for this asset to lose significance as a result of a reduction in the contribution of its current setting to that significance. The magnitude of any effect would be Negligible, and the effect is assessed as **Not Significant** in terms of the EIA Regulations.

7.12.199 The substation would be located c. 500 m to the south-west of the surviving anti-tank cylinders. In views out from the asset in this direction there are boundary hedges and shelter planting that would partially screen Thanet Extension although there are more open areas on the banks of the River Stour where visibility could be clearer. The direction of view towards the substation from the asset is not considered to be a key view due to the assets' relationship with each other, the coast and views out along the river and out to sea making important contributions to significance. There are existing industrial structures surrounding the proposed substation location although these are at a lower height to the proposed structure and as such although the substation would be in keeping with the current setting of the anti-tank cylinders and any increased visual prominence of these elements would be very limited. It would also benefit from existing planting along the northern edge of the Baypoint Sports Club, which would filter views of the substation, even in winter when the trees were not in leaf. It is considered that this element of Thanet Extension would give rise to an effect of Negligible magnitude which is assessed as **not significant** in terms of the EIA Regulations.

7.12.200 Visibility of the other developments considered in the cumulative baseline would be precluded by intervening planting and buildings and consequently no adverse cumulative effects would arise.

7.12.201 The closest proposed WTGs to the anti-tank cylinders will be located c. 18 km away and as such Thanet Extension WTGs could potentially appear as very small and distant features on the horizon and only from the southern extent of the asset due to the Ramsgate headland screening a large portion of Thanet Extension array; this and the presence of existing planting would preclude views from the anti-tank pimples and the pillbox. The views that may be available from the southern extent of the asset, although being part of key views out to sea, would view Thanet Extension WTGs beyond the Port of Ramsgate. This would provide a further sense of separation and introduce further large scale industrial elements to these views as a result of the transporter ships and ferries that use this facility.

7.12.202 With regards to Thanet Extension WTGs appearing in addition to the existing wind farms only the existing TOWF and the Richborough WTG are considered as all others included within the baseline are screened by the intervening land. From the distance involved, the distinction between the existing TOWF and Thanet Extension WTGs would be reduced, although the increased width of Thanet Extension array and increase in height of WTGs would make the development more noticeable. The combination of the TOWF and Thanet Extension WTGs would not be seen within the same arc of view as the closer and Richborough WTG.

7.12.203 Should the existing TOWF be decommissioned at the end of its use Thanet Extension WTGs would provide a more dispersed composition and as such would have less definition as a distant feature on distant horizon that is frequently indistinct as a result of mist and haze.

7.12.204 Although these assets have associative relationships to travel by sea, they were not designed to be viewed from the sea and as such views from offshore locations do not contribute to its heritage significance. The ability to appreciate and understand their function and historical associations is not in any way diminished by the Development.

7.12.205 Due to the distance between the anti-tank cylinders and Thanet Extension WTGs, and the presence of Ramsgate and its associated port intervening in views, it is considered that limited visibility of Thanet Extension WTGs would not cause any loss in the contribution of the setting to the significance of these assets. The potential effect is considered to be Negligible in magnitude and the effect is assessed as **Not Significant**.

#### *Assessment of decommissioning phase*

7.12.206 It has been assumed for the purposes of assessment that the soil mounds would remain following decommissioning of the overground cabling and that the effects identified in the O&M phase would persist indefinitely.

#### **Effects arising from change to setting of Ramsgate Conservation Area and Selected Grade II\* and Grade II Listed Buildings**

7.12.207 The Ramsgate Conservation Area is considered to be of Moderate heritage significance and the associated Grade II\* and Grade II listed buildings are considered to be of High heritage significance for their architectural and historic interest and through their association with the mid-19th to late 20th century fashion for day trips and holidays to seaside resorts.

7.12.208 The Ramsgate Conservation Area as a whole has a diverse feel with what appear to be a number of different character areas including the harbour, the town centre and the beachside elements, the numerous levels on which the conservation area is located further contributes to the feeling of diversity within it. Views of and from the majority of this conservation area in relation to Thanet Extension WTGs are screened by further structures and most of the individual designated assets contained within do not have views looking towards Thanet Extension WTGs. The exceptions to this have been included within the asset group and consist of Grade II\* and Grade II listed structures within the north-eastern extent of the designated area together with the Marina which provides views out across the lower levels of the conservation area.

7.12.209 Indirect effects upon the Ramsgate Conservation Area asset group are considered in relation to Thanet Extension WTGs alone. Other elements of Thanet Extension would not be visible in views of or from the conservation area and would not contribute to any change to setting.

7.12.210 The TOWF WTGs are only discernible in a small number of views from the northern end of the conservation area, either in glimpsed views or oblique views along the sea front northwards. In these views, the WTGs are visible as distant features which are perceived as a discrete offshore development.

#### *Assessment of construction phase*

7.12.211 Indirect effects on the heritage significance of the Ramsgate Conservation Area asset group as a result of visibility of the WTGs construction over and above those presented by the completed array would be temporary and short-lived and as such would lead to a Negligible magnitude of change, the effect of which would be **Not Significant** in terms of the EIA Regulations.

#### *Assessment of O&M phase*

7.12.212 Thanet Extension WTGs would mainly appear in key views along the eastern extent of the conservation area to the north of the East Pier although it may still appear in as a peripheral element in views to the north-east from the harbour as well. The closest WTGs to the designated area would be situated c. 12 km from where views would be available from Winterstoke Gardens and the assets contained therein.

7.12.213 The clearest views of Thanet Extension WTGs would be from the northern extent of the conservation area where WTGs would be visible although key views within this area are predominantly focused directly out to sea in a south-eastern direction and WTGs would be peripheral to these views. Views that look towards Thanet Extension WTGs along and within Winterstoke Gardens are curtailed to the north-east by woodland planting that surrounds the neighbouring King George VI Memorial Park. Thanet Extension WTGs would be visible to one side of this planting as distant elements of the background which would not be incongruous with the current setting due to the existing presence of TOWF. The increased scale and field of view would however be visible in views from within and across Winterstoke Gardens and the listed structures contained within it as distant elements of the background to the more intimate views within the park and as peripheral elements in views out to sea. As the viewer moves further south along Victoria Parade, the WTGs become smaller on the horizon with views glimpsed through planting and structures and the presence of streetlamps along the road reduce the perceptibility of the distant WTGs. Views at the base of the cliffs along Marina Road and Granville Marina in this location and from the northern end of the Royal Vitoria Pavillion, however, remain unobstructed other than partial screening of the western extent of Thanet Extension array by the cliffs as illustrated within Figure 12.32 (Volume 2, Chapter 12: Seascape, Landscape and Visual Impact Assessment (Document Ref: 6.2.12)).

- 7.12.214 Views of Thanet Extension WTGs from further south, in the area of the Marina, are at a distance of c. 13 km where the WTGs would appear as distant features on the horizon. Views that are available from the south and west of the marina would view the WTGs through an area dominated by vertical boat masts which would make the proposed WTGs less discernible. There would be no visibility of the proposed WTGs from the Clock House (NHLE 1336325) would be very limited. At the time of survey, visibility was entirely precluded by temporary hoardings and structures. Even in the absence of these structures, there is strong screening from the underlying landform and the Royal Victoria Pavilions. Fleeting glimpsed views of elements of the array may be possible from the car park area to the north-west of the Clock House, but in these views, foreground elements are prominent and the prominence of the WTGs would be very limited.
- 7.12.215 There would be no visibility of the proposed WTGs in ground level views from Nelson Crescent, with views being screened by the curve of the terrace itself and by buildings on the opposite side of the harbour. The curve of the terrace would appear to preclude any views from the front elevations of the terrace, although some views may be possible from the upper storeys of the (non-designated) end terrace of Prospect Terrace. In any case, taking into account the distance, even where visible the WTGs are not considered to affect the heritage interests in these assets, in terms of their architectural and historic value. No loss of significance resulting from a reduction in the contribution made by setting is this considered to occur.
- 7.12.216 With regards to Thanet Extension appearing in addition to the existing wind farms, only TOWF and the Richborough WTG are considered as all others included within the baseline are screened by the intervening land form. The addition of WTGs to TOWF, however, would increase the field of view occupied by WTGs and introduce differences in the scale of WTGs. The combination of TOWF and Thanet Extension WTGs would not be seen within the same arc of view as the closer and more prominent Richborough WTG.
- 7.12.217 Should the existing TOWF be decommissioned at the end of its use Thanet Extension WTGs would provide a more dispersed composition allowing less obstruction in long views out in this direction. The uniform height of the remaining WTGs would present a more harmonized appearance.
- 7.12.218 The harbour is used primarily by relatively small craft, comprising fishing and pleasure boats although larger vessels including transporter ships and ferries do utilise the port to the south-west of the Ramsgate Conservation Area. Views available from these vessels in which Thanet Extension WTGs could intervene would be from a distance of over 17 km, at which separation it would be difficult to discern the location of the conservation area. Consequently, visibility of Thanet Extension WTGs in views from the sea would not contribute to any adverse effect on the Ramsgate Conservation Area.

- 7.12.219 Due to the presence of the existing TOFW in the limited views available from the north-eastern extent of the Ramsgate Conservation Area asset group, Thanet Extension array, although larger would be still appear as a distant element of longer views. It is not considered to cause any change in setting of any asset within Ramsgate (including the Conservation Area) and consequently there is no reduction in the contribution that the setting makes to the significance of any asset, and no loss of significance is thus predicted. The potential impact is Negligible in magnitude and the significance of the overall effect is assessed as **Not Significant**, and no harm is found for any of these assets.

*Assessment of decommissioning phase*

- 7.12.220 Decommissioning of the Thanet Extension WTGs would have the effect of restoring the current setting (all other circumstances remaining the same), and no significant effect is assessed to occur.

**Effects arising from change to setting of Reculver Saxon Shore Fort, Anglo-Saxon Monastery and Associated Remains (scheduled monument, NHLE 1018784)**

- 7.12.221 This structure is considered to be of national importance as a result of its scheduled status and as such is of High heritage significance. The site derives heritage significance from its historic, archaeological, and architectural interest together with associative value for its connection to the later Roman occupation and the early-medieval occupation of Kent, together with subsequent connections to religious use and its function as a landmark for shipping – the standing towers were re-erected with their use as navigational landmarks in mind. The potential indirect effects resulting from Thanet Extension WTGs are considered within this assessment as the proposed substation would not be visible from this location.
- 7.12.222 The monument includes the surviving part of a Saxon Shore fort, an earlier, temporary Roman military camp and Iron Age farmstead, and a later Anglo-Saxon monastery and medieval parish church. Natural coastal processes have significantly altered the original setting of the monument. During the Roman period the sea was around 1.4 km to the north and Reculver occupied the southern tip of a promontory at the north-western end of the Wantsum Channel. This important strategic position is reflected by its re-use throughout British prehistory and history. In 1809, the then ruined medieval church was bought, repaired and underpinned by Trinity House, and the twin towers are still used as a navigation mark for shipping (Historic England NHLE text).
- 7.12.223 Due to the strategic location and associations with navigation, views out to the sea make an important contribution to the setting of this asset. Views inland along the lower ground of the former Wantsum Channel also contribute to understanding of the asset and its heritage significance.

*Assessment of construction phase*

7.12.224 Indirect effects on the heritage significance of the Reculver Saxon Shore Fort as a result of visibility of the WTGs construction over and above those presented by the completed structures would be temporary and short-lived and as such would lead to a Negligible magnitude of change the effect of which would **Not Significant** terms of the EIA Regulations.

*Assessment of O&M phase*

7.12.225 The closest proposed WTGs to the asset is located c. 23 km away and as such Thanet Extension WTGs could potentially appear as very small and distant features on the horizon that is visible under optimum viewing conditions, as illustrated within Figure 12.27 (Volume 2, Chapter 12: Seascape, Landscape and Visual Impact Assessment (Document Ref: 6.2.12)). With the right conditions, glimpsed views of WTGs would be possible when moving around the surviving structural remains associated with this historic site and less obstructed views of WTGs would occur within the eastern extent of the designated area within key views eastwards along the north coast of Kent.

7.12.226 With regards to Thanet Extension appearing in addition to the existing wind farms all of those included within the existing baseline are considered. From the distance involved the distinction between TOWF and Thanet Extension would be difficult to determine although the increased width of Thanet Extension and increase in height would make the development marginally more noticeable. The combination of the existing and proposed Thanet WTGs would not be seen within the same arc of view as the closer and more prominent KF, KFE OWFs or the GS, GSE and GSD OWFs. TOWF and Thanet Extension could appear in the same portion of the view occupied by the London Array although this would still appear as a separate development. Views to the Richborough WTG would only be possible in views looking away from the other wind farm developments.

7.12.227 Should the existing TOWF be decommissioned at the end of its use Thanet Extension would provide a more dispersed composition and as such would have less definition as a distant feature on the horizon.

7.12.228 Although this asset has been used as a navigation point by vessels passing through the area the any views of the asset that might be available through the WTGs would occur at a distance of over 28 km from where the asset would not be visible as a landmark. Due to the distance involved any views of the towers at Reculver through Thanet Extension WTGs from the sea would not detract from the heritage significance of the asset.

7.12.229 Due to the distance between the Reculver Saxon Shore Fort and Thanet Extension WTGs, it is considered that Thanet Extension WTGs will not cause any reduction in the contribution of setting to this asset's significance. The potential effects is considered to be Negligible in magnitude, the significance of the effect assessed as Not Significant, and no harm is identified.

*Assessment of decommissioning phase*

7.12.230 Decommissioning of the Thanet Extension WTGs would have the effect of restoring the current setting (all other circumstances remaining the same), and no significant effect is assessed to occur.

**Effects arising from change to setting of Richborough Castle (Grade I Listed, NHLE 1363256), Saxon Shore Fort, Roman Port and Associated Remains (scheduled monument, NHLE 1014642)**

7.12.231 This structure is considered to be of national importance as a result of its scheduled status and as such is of High heritage significance. The site derives heritage significance from its historic, archaeological, and architectural interest together with associative value with other assets in the wider area. The potential indirect effects resulting from Thanet Extension WTGs and the proposed substation are considered within this assessment.

7.12.232 The monument includes an area of c. 40 ha containing a variety of archaeological components dating from the Iron Age, Roman and medieval periods, situated on a low sandy promontory around 2.5 km from the present coastline of eastern Kent, overlooking the River Stour to the east. The promontory, which has been shown by excavation, geophysical survey and the study of aerial photographs to have undergone a complex history of development and reuse, originally took the form of a small island situated near the south-eastern end of the Wantsum Channel. The strategic importance of the former island during the Early Roman period is illustrated by the apparent landing of part of the Roman invasion force here in AD 43 (Historic England NHLE text).

7.12.233 The setting of this asset has altered considerably throughout its history although the lower lying land that now occupies the area of the Wantsum Channel does still provide key views from this asset, particularly to the north-west where there is less modern intrusion.

*Assessment of construction phase*

7.12.234 Indirect effects on the heritage significance of the Richborough Castle as a result of visibility of the WTGs and substation construction over and above those presented by the completed structures would be temporary and short-lived and as such would lead to a Negligible magnitude of change the effect of which is assessed as **Not Significant** in terms of the EIA Regulations.

*Assessment of O&M phase*

- 7.12.235 The proposed substation would be located c. 1.5 km to the north-east of the scheduled area. In views out from the asset in this direction the horizon appears broken with numerous areas of shelter planting and occasional industrial elements including electricity pylons, cranes and more distant high buildings. Shelter planting that screens the railway to the east of the scheduled monument and separates this area from the location of the proposed substation further to the north-east would also partially screen the proposed substation. Due to this partial screening of the proposed substation in minor views together with the final structure not breaking the current skyline as illustrated in Figure 2.9 (Volume 3, Chapter 2: Landscape and Visual Impact Assessment (Document Ref: 6.3.2)), it is considered that this element of Thanet Extension would have at worst a Negligible magnitude of change the effect of which is assessed as Not Significant.
- 7.12.236 The closest proposed WTGs to Richborough Castle would be located c. 20 km away and as such Thanet Extension WTGs would only appear (if weather conditions and intervening screening allow) as a very small and distant feature in a small number of glimpsed views of and from the asset against an already broken horizon, as demonstrated by Figure 12.35 (Volume 2, Chapter 12: Seascape Landscape and Visual Impact Assessment (Document Ref: 6.2.12)), and from a very small number of locations within the scheduled area. Thanet Extension array would be partially screened in views from the scheduled area by the intervening landform of the Isle of Thanet. Thanet Extension WTGs would be visible in glimpsed and filtered views when moving around within the asset. Notwithstanding this theoretical and extremely limited potential visibility, it is not considered that the heritage interests (and hence significance) in the asset, in terms of its archaeological, historic and architectural interest are in any way harmed, and there is no reduction in the ability to appreciate or understand its significance.
- 7.12.237 With regards to Thanet Extension appearing in addition to the existing wind farms only the Richborough WTG has been considered as all others included within the baseline, including TOWF, are screened by the intervening land. Thanet Extension would not be seen within the same arc of view as the closer and more prominent Richborough WTG.
- 7.12.238 Although this asset has associative relationships to trade and travel by sea, the changes in landscape and silting up of the Wantsum Channel mean that it is no longer visible from the sea and as such views from offshore locations do not contribute to its heritage significance.
- 7.12.239 Due to the distance between Richborough Castle and Thanet Extension WTGs, and the presence of a broken horizon and screening features in views out to the WTGs, there is no potential for reduction in the contribution that the asset's setting makes to its significance. It is considered that Thanet Extension WTGs would lead to at worst a Negligible magnitude of change the effect of which would be **Not Significant** in terms of the EIA Regulations.

- 7.12.240 The potential for any cumulative effects would be limited by the restricted visibility of the proposed development in views of and from the asset and its presence, along with other developments considered in the cumulative baseline in an existing area of modern industrial development. Consequently, no adverse cumulative effect is anticipated.

*Assessment of decommissioning phase*

- 7.12.241 Decommissioning of the Thanet Extension WTGs would have the effect of restoring the current setting (all other circumstances remaining the same), and no significant effect is assessed to occur

**The Grade II listed Royal Sea Bathing Hospital (NHLE 1088987).**

- 7.12.242 As a Grade II listed building, this asset is of High significance for architectural and historic interests. It was a pioneer hospital in the use of open-air treatment for patients suffering from tubercular complaints. The hospital was designed from the outset with open verandas for patients and anticipated, by more than a century, the open-air treatment of pulmonary tuberculosis.
- 7.12.243 This asset has a clear and strong relationship to the sea which still forms a significant part of its setting today. The history and associative relationship of the structure to the wider area also adds to the heritage significance of this building.

*Assessment of construction phase*

- 7.12.244 Indirect effects on the heritage significance of the Royal Sea Bathing Hospital as a result of visibility of the WTGs and substation construction over and above those presented by the completed structures would be temporary and short-lived and as such would lead to a Negligible magnitude of change the effect of which would be **Not Significant** in terms of the EIA Regulations.

*Assessment of O&M phase of works*

- 7.12.245 The survey demonstrated that views towards Thanet Extension WTGs from the asset are screened by intervening buildings in the area to the north-east. WTGs would be visible in some views of the building from the west, but in these views the hospital is not a prominent feature and the WTGs would not be juxtaposed with the structure. In any case, the architectural and historic interest in the buildings is not changed, and the contribution of setting to the significance of the asset is unchanged. Consequently, any change to setting would be of Negligible magnitude, the effect of which is **Not Significant** in terms of the EIA Regulations, and no harm is identified.

*Assessment of decommissioning phase*

7.12.246 Decommissioning of the Thanet Extension WTGs would have the effect of restoring the current setting (all other circumstances remaining the same), and no significant effect is assessed to occur.

**Effects arising from change to setting of Sandown Castle (scheduled monument, NHLE 1005147)**

7.12.247 This structure is considered to be of national importance as a result of its scheduled status and as such is of High heritage significance. The site derives heritage significance from its historic and archaeological interest together with associative value with the Deal (NHLE 1013380) and Walmer Castles (NHLE 1013381) located further down the coast. The potential indirect effects resulting from Thanet Extension WTGs are considered within this assessment as the proposed substation would not be visible from this location.

7.12.248 This group of castles were built between 1539 – 40 by Henry VIII in order to protect the shallow semi-sheltered anchorage between the Goodwin Sands and the coast, known as the Downs. This was of great strategic importance because, by the 16th century, there were few other safe places of refuge for ships along the channel coast between Kent and Portsmouth. Sandown Castle has been part demolished and largely survives as buried remains, although part of the footings still remain. A rockery has been built upon the western part of the castle and it has also been partly incorporated into the modern sea wall (Historic England, NHLE text).

7.12.249 Due to the strategic location and associations with the other castle on this stretch of coast key views from this asset look out to sea and along the coastline.

*Assessment of construction phase*

7.12.250 Indirect effects on the heritage significance of Sandown Castle as a result of visibility of the WTGs and substation construction over and above those presented by the completed structures would be temporary and short-lived and as such would lead to a Negligible magnitude of change the effect of which would be **Not Significant** in terms of the EIA Regulations.

*Assessment of O&M phase of works*

7.12.251 The closest proposed WTGs to Sandown Castle is located c. 21 km away and as such Thanet Extension WTGs could potentially appear on clearer days as very small and distant features on the horizon. These WTGs would only be visible looking out from the asset and not in the same views of the asset from the shore due to the land to the west of the monument occupying a lower elevation to that now occupied by the rockery and modern sea wall that now represent the visible elements of this monument. The availability of views is important to understanding the Castle function and location, and the ability to appreciate this is unaffected, despite the presence of turbines at distance in such views.

7.12.252 With regards to Thanet Extension appearing in addition to the existing wind farms only TOWF, the London Array and the Richborough WTG have been considered as all others included within the baseline are screened by the intervening land. From the distance involved the distinction between TOWF and Thanet Extension would be difficult to determine although the increased width of Thanet Extension and increase in height would make the development marginally more noticeable. The London Array may also appear in these views although at a distance of c. 40 km these would be readily visible on the distant horizon. The combination of the existing and proposed Thanet WTGs would not be seen within the same arc of view as the Richborough WTG.

7.12.253 Should TOWF be decommissioned at the end of its use, Thanet Extension WTGs would provide a more dispersed composition and as such would have less definition as a distant feature on the horizon.

7.12.254 Given the limited visible upstanding remains relating to this asset, it does not currently form a landmark that is designed to be viewed from the sea. Any views of the asset that might be available through the WTGs would occur at a distance of over 25 km where upon the location of the asset would be difficult to determine. Due to the distance involved and state of survival, any views towards Sandown Castle through Thanet Extension WTGs from the sea would not detract from the heritage significance of the asset.

7.12.255 Visibility of Thanet Extension as a distant feature in some views to sea from the asset would not discernibly affect the asset's historic or architectural interest and would not in any way affect the significance of this asset. The potential magnitude of effect is considered to be Negligible, and the effect is assessed as **Not Significant**.

*Assessment of decommissioning phase*

7.12.256 Decommissioning of the Thanet Extension WTGs would have the effect of restoring the current setting (all other circumstances remaining the same), and no significant effect is assessed to occur.

### Effects arising from change to setting of Seven Stones House (Grade II Listed, NHLE 1390592)

7.12.257 This structure is considered to be of High heritage significance from its historic and architectural interest, and this is reflected in its Listing. The potential indirect effects resulting from Thanet Extension WTGs alone are considered within this assessment as the proposed substation would not be visible from this location.

7.12.258 The building is a remarkably intact example of a late Arts and Crafts house in the Jacobean style that was built in 1927 by S H Evans, assistant to Sir Edwin Lutyens (Historic England NHLE text); it is from this association and its architectural detail (internal and external) that the House derives its significance. Key views from this location look directly out to sea in a south-eastern direction although views from the north-eastern side of the building could take in Thanet Extension WTGs.

#### *Assessment of construction phase*

7.12.259 Indirect effects on the heritage significance of Seven Stones House as a result of visibility of the WTGs and substation construction over and above those presented by the completed structures would be temporary and short-lived and as such would lead to a Negligible magnitude of change the effect of which would be Not Significant in terms of the EIA Regulations.

#### *Assessment of O&M phase*

7.12.260 The closest proposed WTGs to Seven Stones House would be located c. 11 km away. Views from the ground floor would be partially screened by the surrounding boundary hedge although unobscured views could be possible from the upper floors. In these views WTGs would appear in the periphery of key views eastwards from the house. The architectural and historic significance of the house is not otherwise affected, and the ability to appreciate its significance is undiminished even where turbines may be visible in distant and fleeting views from windows within the property.

7.12.261 With regards to Thanet Extension appearing in addition to the existing wind farms only TOWF has been considered as all others included within the baseline are screened from Seven Stones House by neighbouring properties. The addition of WTGs to the existing TOWF would not be incongruous with the current setting of the house, although they would slightly increase the field of view occupied by WTGs and would introduce differences in scale, disrupting the existing grid pattern and causing potential stacking and overlapping of WTGs. Amendment of the offshore Red Line Boundary would mean that the WTGs at the northern end of the array would appear with less prominence than in the layout considered at PEIR, further reducing any magnitude of change.

7.12.262 Should the existing TOWF be decommissioned at the end of its use Thanet Extension would provide a more dispersed composition allowing less obstruction in long views out in this direction. The uniform height of the remaining WTGs means that they would present a more harmonized display.

7.12.263 Seven Stones House was not designed to be a landmark feature to be viewed from the sea. Any views of the asset that might be available through the WTGs would occur at a distance of over 14 km where upon the location of the asset would be difficult to determine. Due to the distance involved any views towards Seven Stones House through Thanet Extension WTGs from the sea would not detract from the heritage significance of the asset.

7.12.264 As the existing TOWF already forms part of the setting to this asset and because visibility of the proposed Thanet Extension WTGs is limited, and given that the contribution that setting makes to the significance of this asset is unaltered, an effect of negligible magnitude is predicted and the overall effects is assessed as **Not Significant**.

#### *Assessment of decommissioning phase*

7.12.265 Decommissioning of the Thanet Extension WTGs would have the effect of restoring the current setting (all other circumstances remaining the same), and **no significant** effect is assessed to occur.

### Effects arising from change to setting of South Foreland Lighthouse (Grade II Listed, NHLE 1101512)

7.12.266 This structure is considered to be of special interest for its historic, architectural and associative interest with connections to North Foreland Lighthouse (NHLE 1222802) and a 'lower lighthouse' also at South Foreland together with sea trade within the area. It is considered to be of High heritage significance and this is reflected in its Listing. The potential indirect effects resulting from Thanet Extension alone are considered within this assessment as other elements of the proposed development would not be visible to a level that would affect the setting of the asset.



7.12.267 South Foreland Lighthouse, together with North Foreland Lighthouse (NHLE 1222802) were built in order to help with navigation of the coast in this area, particularly the Goodwin Sands. A light in one form or another has been present on the clifftops in this area since the 14th century to warn ships of the hazards presented by this natural feature. The first light in this area dates from 1367 when Brother Nicholas de Legh of St Margaret's hung a lantern on the cliff face in order to warn the sailors of the danger. The first lights that resembled lighthouses at this location were constructed in 1635 when Sir John Meldrum arranged for the construction of two iron braziers which held an open fire. These were the beginnings of what are now known as the 'upper' and 'lower' lighthouses of South Foreland. The Upper Lighthouse (South Foreland Lighthouse NHLE 1101512) was heightened and refurbished in 1842, and then in 1846 the Lower Light was fully rebuilt. The works were supervised by one of the greatest Victorian engineers, James Walker. The Upper and Lower Lighthouses can be seen from the land, but are even more obvious when viewed from the sea. They were designed to be used together. The seamen would line up the two lights, and when the Upper Light shone directly above the Lower Light they could steer safely past the southern tip of the Goodwin Sands. By 1904 the movement of Goodwin Sands meant that this arrangement was no longer safe, so the Lower Light was switched off. A much brighter flashing light was installed in the Upper Lighthouse. For most of the twentieth century South Foreland shone out nightly over the Straits of Dover until 30th September 1988, when modern navigational aids meant that the lighthouse could be decommissioned (National Trust website).

7.12.268 The property is now owned and managed by the National Trust who promote the site extensively and provide tours of the asset including access to the balcony surrounding the light at the top of the structure. The extensive views available from the asset in combination with its original use as a focal point from the sea means that it has an extensive setting and due to the connections with the Goodwin Sands, views out over this and as a result towards Thanet Extension WTGs are considered to be key views. However, given the nature of this feature, it is the ability to be seen (particularly at night) that is key to its appreciation and understanding, not specifically what can be seen from the tower when looking out to sea.

#### *Assessment of construction phase*

7.12.269 Indirect effects on the heritage significance of the North Foreland Lighthouse as a result of visibility of the WTGs construction over and above those presented by the completed structures would be temporary and short-lived and as such would lead to a Negligible magnitude of change the effect of which would be **Not Significant** in terms of the EIA Regulations.

#### *Assessment of O&M phase*

7.12.270 The closest proposed WTGs to South Foreland Lighthouse would be located c. 31 km away and as such Thanet Extension WTGs would potentially appear as very distant features within the assets setting in favourable conditions. Views of Thanet Extension WTGs from the ground floor and surrounding grounds would be screened by shelter planting and the intervening topography but views would be available from the top of the lighthouse which is publicly accessible. Key views from the top of the lighthouse are considered to look out over the sea and primarily the Goodwin Sands which were considered to be one of the most treacherous parts of the coast to navigate. Thanet Extension WTGs would appear as very small and distant features on the horizon, beyond the Goodwin Sands in these key views and would only be visible under optimum viewing conditions as shown demonstrated by Figure 12.49 (Volume 2, Chapter 12: Seascape Landscape and Visual Impact Assessment (Document Ref: 6.2.12)).

7.12.271 With regards to Thanet Extension appearing in addition to the existing wind farms, only TOWF and the Richborough WTG have been considered as the remaining OWFs included within the baseline are either screened by the intervening Isle of Thanet or at a distance of at least c. 50 km from this location. From the distance involved the distinction between TOWF and Thanet Extension would be difficult to determine, although the increased width of Thanet Extension and increase in height of WTGs could make the development marginally more noticeable. The combination of the existing and proposed Thanet WTGs would not be seen within the same arc of view as the Richborough WTG.

7.12.272 Vessels passing through this area closer to the coast predominantly consist of relatively small craft, comprising fishing and pleasure boats although larger vessels do pass through the area further out to sea. For vessels traveling through the area further from the shore where views of the asset could be disrupted by Thanet Extension WTGs the asset would be viewed from a distance of over 35 km. From this distance, the landmark nature of the lighthouse would not be noticeable during the day and as the light is no longer operating, it would not be visible at night. Consequently, visibility of Thanet Extension WTGs in views to the South Foreland Lighthouse from the sea would not contribute to any adverse effect on the setting of this asset.

7.12.273 Very distant visibility of Thanet Extension in a portion of the view where TOWF is already visible would not give rise to any discernible change to significance. The ability to understand and appreciate the architectural and historic interest in the asset, and its relationship with North Foreland will not be affected in anyway, and there is no potential for a loss of significance to occur. The Thanet Extension will cause an effect of Negligible magnitude the effect of which would be **Not Significant** in terms of the EIA Regulations.

*Assessment of decommissioning phase*

7.12.274 Decommissioning of the Thanet Extension WTGs would have the effect of restoring the current setting (all other circumstances remaining the same), and no significant effect is assessed to occur.

**Effects arising from change to setting of Walmer Artillery Castle (scheduled monument, NHLE 1013381)**

7.12.275 This structure is considered to be of national importance, reflected by its scheduled status and as such is of High heritage significance, which is reinforced by the Grade II listed Registered Park and Garden (NHLE 1000291) in which it sits. The site derives heritage significance from its historic, architectural and archaeological interest together with its associations with Deal (NHLE 1013380) and Sandown Castles (NHLE 1005147) located along the coast. The potential indirect effects resulting from Thanet Extension WTGs alone are considered within this assessment as the proposed substation would not be visible from this location.

7.12.276 Walmer Castle, with Deal and Sandown Castles, was one of a group of castles built between 1539-40 by Henry VIII. Walmer Castle was designed around an essentially circular, symmetrical plan. At the centre of the original castle is a three-storeyed circular citadel, or tower, surrounded by four low semi-circular bastions connected by a curtain wall. The castle buildings are further protected by a stone-lined dry moat, now forming part of the castle's gardens (Historic England NHLE text). Views out to sea, and as such Thanet Extension WTGs, are not available from the lower levels of the castle or the surrounding garden due to screening provided by the moat itself and planting that forms part of the Registered Park and Garden.

7.12.277 Due to the strategic location and associations with the other castle on this stretch of coast key views from this asset are considered to look out to sea and along the coastline. It is the availability of such views that is important to understanding both the location and function of these fortifications, not specifically what may be visible in any such view. Views across the grounds and across the gardens also make important contributions to the scheduled monument's heritage significance and setting. The planting scheme around the castle has fundamentally altered the asset's relationship to the sea and the adjacent settlement, restricting views out to sea from ground level and the bastions.

*Assessment of construction phase*

7.12.278 Indirect effects on the heritage significance of Sandown Castle as a result of visibility of the WTGs and substation construction over and above those presented by the completed structures would be temporary and short-lived and as such would lead to a Negligible magnitude of change the effect of which would be **Not Significant** in terms of the EIA Regulations.

*Assessment of O&M phase*

7.12.279 The closest proposed WTGs to Walmer Castle is located c. 25 km away and as such Thanet Extension WTGs could potentially appear on clearer days as a very small and distant feature on the horizon. These WTGs would only be visible in filtered views looking out from the asset and not in views of the asset from the shore due to the screening provided by the building itself and associated planting from locations further back from the coast and within the associated gardens. Views out to sea and towards Thanet Extension WTGs are only available from the eastern Bastions and potentially from some of the windows within the 18th and 19th century alterations built onto the north-eastern Bastion as a residence for the Lords Warden of the Cinque Ports. Views out towards Thanet Extension WTGs from these areas would still be partially screened or filtered by trees planted to the north-east of the castle. The eastern extent of Thanet Extension array would be visible as a distant feature on the horizon but would be peripheral to the more open key views looking out towards the east or south-east towards France which is visible on clear days. Its presence even when visible does not in any way affect the contribution that the setting makes to the castle's significance, nor does it affect the way in which that significance can be appreciated or understood.

7.12.280 With regards to Thanet Extension appearing in addition to the existing wind farms only TOWF has been considered as the remaining wind farms and WTGs included within the baseline are either screened by the intervening landscape features or are located at a distance of over c. 42 km from this location. From the distance involved the distinction between TOWF and Thanet Extension would be difficult to determine although the increased width of Thanet Extension and increase in height of WTGs could make the development marginally more noticeable.

7.12.281 Vessels passing through this area closer to the coast consist of relatively small craft, comprising fishing and pleasure boats although larger vessels do pass through the English Channel further out to sea. For vessels traveling through the area further from the shore where views of the asset could be disrupted by Thanet Extension WTGs the asset would be viewed from a distance of over 29 km. From this distance and with the surrounding planting Walmer Castle would not be visible as a notable landmark. Consequently, visibility of Thanet Extension WTGs in views to Walmer Castle from the sea would not contribute to any adverse effect on the setting of this asset.

7.12.282 Due to the distance between Walmer Castle and Thanet Extension WTGs together with the limited views which are not key to the heritage significance of the asset, there is no potential for a loss of significance to occur to the asset. Therefore it is considered that Thanet Extension WTGs have only a Negligible magnitude of change the effect of which would be **Not Significant** in terms of the EIA Regulations.

### *Assessment of decommissioning phase*

7.12.283 Decommissioning of the Thanet Extension WTGs would have the effect of restoring the current setting (all other circumstances remaining the same), and no significant effect is assessed to occur.

### **Effects arising from change to setting of Walmer Seafront Conservation Area**

7.12.284 The Walmer Seafront Conservation Area is considered to be of Medium heritage significance for its architectural and historic interest. Walmer Seafront Conservation Area which includes Admiralty Mews, the former Naval Hospital and the later Royal Marines' School of Music, most of Archery Square and seafront properties along Marine Road, The Beach, The Strand, York Road and Campbell Road (Walmer Environment Study Group, 2014); these Grade II listed assets are considered to be of High heritage significance by virtue of their architectural and historic interests. Indirect effects upon the Walmer Conservation Area and selected Grade II listed buildings are considered in relation to Thanet Extension WTGs. Other elements of Thanet Extension would not be visible in views of or from the conservation area and would not contribute to any change to setting.

7.12.285 The footpaths that run along the beach have open and uninterrupted views out to sea although moving away from the front, views quickly become more cluttered. The setting of the conservation area is strongly related to the promenade, beach and the sea. The availability of views out to sea and this strong coastal association makes a contribution to the assets heritage significance. The intervisibility between a number of onshore assets such as the Royal Marines School of Music (NHLE 1253979) and the East Barracks (NHLE 1259179) also contribute through their evidential value in respect of defence and the infrastructure supporting the armed forces.

### *Assessment of construction phase*

7.12.286 Indirect effects on the heritage significance of the Walmer Seafront Conservation Area as a result of visibility of the WTGs construction over and above those presented by the completed array would be temporary and short-lived and as such would lead to a Negligible magnitude of change the effect of which would be **Not Significant** in terms of the EIA Regulations.

### *Assessment of O&M phase*

7.12.287 The western half of the conservation area has around York Street no clear views out to Thanet Extension WTGs. Areas of clearer visibility along the seafront noted are also marked by a large quantity of vertical features along the coast, including boat masts at the Downs Sailing Club and street furniture within the neighbouring Deal Middle Street Conservation Area including streetlamps and the pier. The closest WTGs to the designated area would be situated c. 23 km away from which distance WTGs would appear as very small and distant features on the horizon and would be partially screened by Deal Pier. The clutter of vertical elements along the shoreline would also provide scale to any visible WTGs and illustrate the separation that is present. It is not considered that historic and architectural interests in the assets within the Conservation Area are in any way affected. The ability to appreciate the significance of these assets is not affected. Distant visibility of the Thanet Extension WTGs from parts of the Area are not considered to affect the character and appearance of the area.

7.12.288 With regards to Thanet Extension appearing in addition to the existing wind farms and WTGs within the area, only TOWF and the London Array OWF could be visible from the Walmer Seafront Conservation Area with all others being screened from this location by intervening structures and/ or topography. If visible at all, it is only the eastern extent of the London Array that might be seen on very clear days and from the eastern edges of the conservation area. The London Array is also c. 40 km from the Walmer Seafront Conservation Area and as such it is unlikely that these WTGs will be noticeable unless the viewer actively searches for them, even when appearing in the same field of view as the existing TOWF and proposed Thanet Extension. From the distance involved the distinction between TOWF and Thanet Extension would be difficult to determine although the increased width of Thanet Extension and increase in height could make the development marginally more noticeable.

7.12.289 Vessels passing through this area closer to the coast consist of relatively small craft, comprising fishing and pleasure boats although larger vessels do pass through the English Channel further out to sea. For vessels traveling through the area further from the shore where views of the Walmer Seafront Conservation Area could be disrupted by Thanet Extension the asset would be viewed from a distance of over 27 km. From this distance the conservation area would not be discernible and consequently, visibility of Thanet Extension WTGs in views to the Walmer Seafront Conservation Area from the sea would not contribute to any adverse effect on the setting of this asset.

7.12.290 Although Thanet Extension WTGs would be visible in some views along the eastern edge of the Walmer Seafront Conservation Areas, they would appear as very distant features on clearer days and introduce a small increase in visibility compared to the assets current setting. There is no change in the character and appearance of the Area, and the significance of the assets within it is not diminished as no reduction in the contribution that the wider setting makes to their significance is predicted. This would result in a Negligible magnitude of change the effect of which is **Not Significant** in terms of the EIA Regulations, and no harm is identified.

*Assessment of decommissioning phase*

7.12.291 Decommissioning of the Thanet Extension WTGs would have the effect of restoring the current setting (all other circumstances remaining the same), and no significant effect is assessed to occur.

**Change to the setting and historic landscape character of the Wantsum Channel**

7.12.292 The Wantsum Channel separated the Isle of Thanet from the north-eastern extent of Kent and connected the English Channel to the Thames Estuary. This strait was defended in a number of locations including the Richborough Castle (NHLE 1363256) and associated scheduled Saxon Shore Fort and Roman Port (NHLE 1014642). The strait silted up over the course of the last millennia although remains of the small harbours and quays in the villages that bordered Wantsum Channel can still be seen today. The existing landscape contributes substantially to the asset's archaeological and historic interests. The associative links with numerous historical features that help to illustrate the history of the landscape change in this area such as sea defences, ports and harbours also make a significant contribution to the heritage significance of the asset. The Wantsum Channel is still a promoted feature of the landscape today with numerous walks and information panels present along its route. It is consequently considered to be of High significance.

*Assessment of construction phase*

7.12.293 Change to historic landscape character during construction of the proposed development would be limited as visible change would occur primarily in areas which have already been disturbed or developed at Richborough Port, and any visible changes would be short-lived and would be restored on completion. Consequently, and change would be of a Negligible magnitude, the effect of which would be **Not Significant** in terms of the EIA Regulations.

*Assessment of O&M phase*

7.12.294 Due to the siting of the substation within an area of existing industrial development where the underlying form of the Wantsum Channel has already been significantly modified it is not expected to impact upon sensitive elements of the assets setting. Thanet Extension WTGs will not appear in views of the Wantsum Channel and will only be visible from small discrete areas on the fringes of the asset when looking away from the asset itself. Consequently, no effect is anticipated.

7.12.295 Direct effects on the geoarchaeologically significant deposits present within the former Wantsum Channel are considered at (section 7.11.16).

*Assessment of decommissioning phase*

7.12.296 No adverse effects are anticipated as a result of the location of the onshore elements of the proposed development within areas which have been subject to past landscape change.

**Effects arising from change to setting of Westgate-on-Sea Conservation Area and Grade II Listed Westgate-on-Sea British Legion War Memorial (NHLE 1443700)**

7.12.297 The Westgate-on-Sea Conservation Area is considered to be of Moderate heritage significance and the associated buildings are considered to be of High heritage significance for their architectural and historic interest as demonstrated by its designated status. The British Legion War Memorial also has historic interest for its association with the continued remembrance events and traditions that are carried out in the UK. Indirect effects upon the Westgate-on-Sea Conservation Area and associated War Memorial are considered in relation to Thanet Extension WTGs. Other elements of Thanet Extension would not be visible in views of or from the conservation area and would not contribute to any change to setting.

7.12.298 The Westgate-on-Sea conservation area provides two different experiences whilst walking through it, the urban context gives the buildings a relationship to each other while the coastal locations link to the sea views and open vistas. Aspects of the setting that provide an important contribution to the War Memorial and the conservation area's heritage significance include the relationship between the individual buildings, the current streetscape, the views out and across the coastline together with the green spaces and open areas along the coast.

*Assessment of construction phase*

7.12.299 Indirect effects on the heritage significance of the Westgate-on-Sea Conservation Area as a result of visibility of the WTGs construction over and above those presented by the completed array would be temporary and short-lived and as such would lead to a Negligible magnitude of change the effect of which would be **Not Significant** in terms of the EIA Regulations.

### *Assessment of O&M phase*

- 7.12.300 Thanet Extension WTGs would be screened from the majority of the conservation area by the intervening buildings and topography with only the northern extent of Thanet Extension WTGs being visible from a small area at the northern extent of the designated area in which the War Memorial is located. From this location, the visible portion of Thanet Extension array would appear as a distant feature on the horizon as peripheral elements within views out to sea within a much wider panorama. Amendments to the offshore Red Line Boundary would mean that the proposed array would appear with reduced prominence in views from the asset compared to the layout considered at PEIR. The closest WTGs to the designated area would be situated c. 14 km away. At this distance Thanet Extension WTGs would not detract from views of the War Memorial as this asset is designed to be the focus of attention in close views.
- 7.12.301 With regards to Thanet Extension appearing in addition to the existing wind farms and WTGs within the wider area, all of the existing wind farms included within the baseline with the exception of the Richborough WTG have been considered. The Richborough WTG is screened from this location by intervening structures.
- 7.12.302 The presence of TOWF means that Thanet Extension WTGs would not be incongruous to the current setting. The addition of WTGs to TOWF, however, would increase the field of view occupied by WTGs and introduce differences in the scale of WTGs between proposed and existing arrays, disrupting the existing grid pattern.
- 7.12.303 The London Array, KF, KFE, GS, GSE, and GSD offshore wind farms would all be visible from the conservation with the London Array appearing in the same field of view as TOWF and Thanet Extension. Thanet Extension would only marginally increase the field of view occupied by WTGs due to the southern half of the array being screened, although the increased scale of Thanet Extension would be discernible.
- 7.12.304 Should the existing TOWF be decommissioned at the end of its use Thanet Extension WTGs would provide a more dispersed composition and the uniform height of the remaining WTGs would present a more harmonized appearance.
- 7.12.305 Vessels passing through this area closer to the coast consist of relatively small craft, comprising fishing and pleasure boats although larger vessels do pass through the area on route to the Thames further out to sea. For vessels traveling through the area further from the shore where views of the Westgate-on-Sea Conservation Area group could be disrupted by Thanet Extension WTGs, the assets would be viewed from a distance of over 18 km. From this distance the conservation area would not be readily discernible and consequently, visibility of Thanet Extension WTGs in views to this asset group from the sea would not contribute to any adverse effect on the setting of this assets.

- 7.12.306 Due to the presence of the existing wind farms in the limited views available from the open spaces and listed buildings within the northern extent of the conservation area, Thanet Extension WTGs, although larger would not be incongruous with the current setting and still appear as distant elements on the periphery of longer views, largely screened by the intervening topography. Due to the focus of the War Memorial being more local and as the asset itself provides a focal point it is considered that Thanet Extension WTGs would not cause any reduction in the contribution makes to the significance of both the memorial and the Area. This is a Negligible magnitude of change the effect of which is assessed as **Not Significant** in terms of the EIA Regulations, and no harm has been identified.

### *Assessment of decommissioning phase*

- 7.12.307 Decommissioning of the Thanet Extension WTGs would have the effect of restoring the current setting (all other circumstances remaining the same), and no significant effect is assessed to occur.

## **7.13 Environmental assessment: cumulative effects**

- 7.13.1 Cumulative effects refer to effects upon receptors arising from Thanet Extension when considered alongside other proposed developments and activities and any other *reasonably foreseeable project(s)* proposals. In this context the term *projects* is considered to refer to any project with comparable effects and is not limited to offshore wind projects.
- 7.13.2 The approach to cumulative assessment for Thanet Extension takes into account the Cumulative Impact Assessment Guidelines issued by RenewableUK in June 2013, together with comments made in response to other renewable energy developments within the Southern North Sea, the Planning Inspectorate (PINS) 'Advice Note 9: Rochdale Approach' and 'Advice Note 17: Cumulative Effects Assessment'. The relevant projects, the suggested tiers, and the Cumulative Impact Assessment approach conducted for Thanet Extension have been agreed with the stakeholders under the auspices of the EIA Evidence Plan (Document Ref: 8.5).
- 7.13.3 In assessing the potential cumulative impact(s) for Thanet Extension, it is important to bear in mind that for some projects, predominantly those 'proposed' or identified in development plans etc. may or may not actually be taken forward. There is thus a need to build in some consideration of certainty (or uncertainty) with respect to the potential impacts which might arise from such proposals. For example, relevant projects/ plans that are already under construction are likely to contribute to cumulative impact with Thanet Extension (providing effect or spatial pathways exist), whereas projects/ plans not yet approved or not yet submitted are less certain to contribute to such an impact, as some may not achieve approval or may not ultimately be built due to other factors.

7.13.4 For this reason, all relevant projects/ plans considered cumulatively alongside Thanet Extension have been allocated into 'Tiers', reflecting their current stage within the planning and development process. This allows the cumulative impact assessment to present several future development scenarios, each with a differing potential for being ultimately built out. Appropriate weight may therefore be given to each scenario (Tier) in the decision making process when considering the potential cumulative impact associated with Thanet Extension (e.g., it may be considered that greater weight can be placed on the Tier 1 assessment relative to Tier 2).

7.13.5 The projects and plans selected as relevant to the assessment of impacts to the onshore historic environment are based upon an initial screening exercise undertaken on a long list. Each project, plan or activity has been considered and scoped in or out on the basis of effect–receptor pathway, data confidence and the temporal and spatial scales involved.

7.13.6 The proposed tier structure, intended to ensure that there is a clear understanding of the level of confidence in the cumulative assessments provided in 7.13.5 Thanet Extension ES, is as follows:

#### Tier 1

7.13.7 Thanet Extension considered alongside other projects/ plans currently under construction and/ or those consented but not yet implemented, and/ or those submitted but not yet determined where data confidence for the projects falling within this category is high.

7.13.8 Built and operational projects will be included within the cumulative assessment where they have not been included within the environmental characterisation survey, i.e. they were not operational when baseline surveys were undertaken, and/ or any residual impact may not have yet fed through to and been captured in estimates of 'baseline' conditions or there is an ongoing effect.

#### Tier 2

7.13.9 All projects included in Tier 1 plus other projects/ plans consented but not yet implemented and/ or submitted applications not yet determined where data confidence for the projects falling into this category is medium.

#### Tier 3

7.13.10 The above plus projects on relevant plans and programmes (the PINS Programme of Projects and MMO 'Marine Case Management System' being the source most relevant for this assessment). Specifically, all projects where the developer has advised PINS in writing that they intend to submit an application in the future were considered. This includes, for example, East Anglia (Three and Four) for which scoping reports have been submitted and data availability is limited and/ or data confidence is low.

#### Scope of cumulative assessment

7.13.11 The specific projects scoped into this cumulative impact assessment, and the tiers into which they have been allocated are presented in Table 7.13 below. The operational projects included within the table are included due to their completion/ commission subsequent to the data collection process for Thanet Extension and as such not included within the baseline characterisation.

7.13.12 A review of proposed wind farms included within the cumulative screening was reviewed for indirect effects resulting from off shore developments against a study area of 45 km from the high tide line to represent possible visibility from onshore heritage assets. This review demonstrated that the only off shore wind farms within this area are already operational and as such included within the baseline of section 7.12. No further proposed offshore developments were within 45 km of the high tide line and as such no proposed offshore developments have been considered for further cumulative assessment.

7.13.13 The specific onshore projects scoped into this cumulative impact assessment, and the tiers into which they have been allocated are presented in Table 7.13.

**Table 7.13: Onshore projects for cumulative assessment**

Development type	Project	Status	Data confidence assessment/ phase	Tier
Proposed 400 kV electricity transmission connection between Richborough and Canterbury in Kent to connect the proposed new UK to Belgium interconnector (known as the Nemo Link).	Richborough Connection	DCO Permitted application	High - Third party project details published in the public domain.	Tier 1
Solar Farm	Thanet Solar Ltd, Land West of Richborough Power Station, Ramsgate Road	Permission granted	High - Third party project details published in the public domain.	Tier 2
Biomass heat and power station	Biomass Combined Heat and Power Plant, Discovery Park	Permission granted	High - Third party project details published in the public domain.	Tier 2
Site redevelopment	Discovery Park	Permission granted	High - Third party project details published in the public domain.	Tier 2
Log storage and processing area	Discovery Park Log Storage and Processing Area	Permission granted	High - Third party project details published in the public domain.	Tier 2
Research, development and manufacturing unit	Instro, Discovery Park	Permission granted	High - Third party project details published in the public domain.	Tier 2

**Table 7.14: Cumulative Rochdale Envelope**

Impact	Scenario	Justification
Direct effects on heritage assets	Assess committed development that would impact discrete heritage assets or groups of heritage assets that would also be affected during the construction phase of Thanet Extension.	Disturbance of heritage assets or groups of heritage assets by other development would present an increased magnitude of change.
Indirect effects on setting and views to/ of designated heritage assets, causing a reduction in the contribution of setting to the significance of an asset, and hence loss of overall significance	Assess committed development that would impact on the settings and views to/ from selected designated and non-designated heritage assets during the construction and O&M phases of Thanet Extension.	Construction and operation of other development alongside Thanet Extension may result in cumulative effects on the settings and view to/ from the heritage assets and represent a worst-case.

**7.14 Cumulative effects**

**Direct effects**

7.14.1 No other proposed onshore development has been identified that has the potential to give rise to a cumulative adverse direct effect on any part of the Boarded Groin or the WWII anti-invasion defences at Pegwell Bay. Consequently, no cumulative adverse effects would arise on either asset group.

7.14.2 It is possible that proposed development at REP and at the Discovery Park could give rise to disturbance of elements of the former military depot at Richborough port. These developments are:

- Erection of a biomass combined heat and power plant with fuel storage and associated works;
- Outline application for the redevelopment of site, at the Discovery Park, Ramsgate Road, Sandwich, CT13 9ND, 14/00058;

- The use of land for additional log storage processing area and wood chip store in association with biomass combined, at the Discovery Park, Ramsgate Road, Sandwich, CT13 9ND, 14/00091;
- Erection of a 4230 sqm research, development and manufacturing building, ancillary office floorspace (Class B2), car park and servicing area at the Discovery Park, Ramsgate Road, Sandwich, CT13 9ND, 16/00045; and
- Richborough Connection: Proposed 400 kV electricity transmission connection between Richborough and Canterbury in Kent to connect the proposed new UK to Belgium interconnector (known as the Nemo Link), EN020017.

7.14.3 None of these developments would affect discrete heritage assets which would also be affected by the proposed cabling or substation, although all have the potential to affect elements of the wider group of related heritage assets which comprise Richborough Port. In all cases, these developments would occupy areas within the former Richborough Port site that have already been significantly disturbed by prior development and are not anticipated to give rise to any discernible adverse effects. Taken with the limited magnitude of any effects caused by the offshore cabling, no adverse cumulative effects are anticipated.

#### Indirect effects

- 7.14.4 The existing OWFs have been considered as part of the existing baseline and are not considered further in the assessment of cumulative effects.
- 7.14.5 The proposed onshore other development which could give rise to adverse cumulative indirect effects comprises:
- Creation of a 5 MW solar Farm with associated solar panels, invertors, sub-stations, security fencing, access, infrastructure and associated works;
  - Erection of a biomass combined heat and power plant with fuel storage and associated works;
  - Outline application for the redevelopment of site, at the Discovery Park, , Ramsgate Road, Sandwich, CT13 9ND, 14/00058;
  - The use of land for additional log storage processing area and wood chip store in association with biomass combined, at the Discovery Park, Ramsgate Road, Sandwich, CT13 9ND, 14/00091;
  - Erection of a 4230 sqm research, development and manufacturing building, ancillary office floorspace (Class B2), car park and servicing area, at the Discovery Park, Ramsgate Road, Sandwich, CT13 9ND, 16/00045; and

- Richborough Connection: Proposed 400 kV electricity transmission connection between Richborough and Canterbury in Kent to connect the proposed new UK to Belgium interconnector (known as the Nemo Link), EN020017.

7.14.6 Where these developments would present a discernible change in the settings of designated heritage assets, visibility of the onshore elements of the proposed development would be largely screened by intervening planning, landform and/or modern structures, and the onshore elements of the proposed development would appear as part of the existing area of industrial development around Richborough Port. Consequently, no adverse cumulative effects are anticipated.

#### 7.15 Inter-relationships

- 7.15.1 Inter-related effects on heritage assets are not anticipated.
- 7.15.2 Loss of archaeological remains which also function as wildlife habitat would not give rise to any inter-related effects as effects on biodiversity will be mitigated or offset.
- 7.15.3 Any adverse visual effects arising as a result of change in valued views would not constitute an inter-related effect because, insofar as they relate to the significance of heritage assets, these views represent a subset of the changes already considered within the historic environment assessment. Change to significance resulting from visibility of WTGs and other elements Thanet Extension has already been considered in the assessment of effects and consequently there would be no increase in the magnitude of change as a result of any inter-related effect.

#### 7.16 Mitigation

- 7.16.1 Mitigation of direct effects will be achieved through a combination of avoidance of sensitive receptors through design and the agreement of a defined scheme of archaeological investigation which will allow any loss of evidential interest from known and as-yet unrecorded archaeological heritage assets to be mitigated through recording.
- 7.16.2 It is unlikely that any significant indirect effects could be mitigated except through design change intended to increase the visual coherence of the proposed WTGs array and minimise the sense of coalescence of separate blocks of WTGs.

#### 7.17 Summary of effects

- 7.17.1 Table 7.15 provides a summary of all potential significant effects resulting from Thanet Extension together with mitigation measures that could be employed to reduce these effects.



- 7.17.2 No effects considered significant for purposes of the EIA regulations have been identified, notwithstanding some changes in setting arising from the presence of the proposed Development. Only two instances of harm to the significance of heritage assets have been identified: these are effects on the character and appearance of the Clifftop Conservation Area and the Broadstairs Conservation Area arising from the visibility of the Thant Extension WTGs across a part of those Areas. In the case of Clifftop Conservation Area the effect is confined to the northern extent of the Area and in the case of Broadstairs the effect is restricted to the eastern side of the Area (specifically in views from the southern side of that Area). In both cases, as the extent of the effect is limited, the degree of harm is considered to be “less than substantial”.
- 7.17.3 In all other cases, no harm has been found to the significance of any heritage asset, nor to the way in which that significance is appreciated and/or understood. The character and appearance of Conservation Areas is considered to be preserved, as are the settings of Listed Buildings.

**Table 7.15: Summary of predicted impacts of Thanet Extension**

Description of impact	Impact	Possible mitigation measures	Residual impact
<b>Construction</b>			
Disturbance of elements of the anti-invasion defences at Pegwell Bay.	No effect predicted	No further mitigation is proposed as archaeological works have been considered as embedded measures	No effect predicted
Disturbance of elements of the Boarded Groin and associated floodbanks.	No effect predicted	No further mitigation is proposed as archaeological works have been considered as embedded measures	No effect predicted
Disturbance of Richborough Port and related heritage assets	No effect predicted	No further mitigation is proposed as archaeological works have been considered as embedded measures	No effect predicted
<b>O&amp;M</b>			
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: Abbot's Wall.	No effect predicted	No mitigation is proposed	No effect predicted.
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: Boarded Groin.	No effect predicted	No mitigation is proposed.	No effect predicted
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: Broadstairs Conservation Area.	Potential Minor effect: not significant effect.	No mitigation is proposed.	Potential Minor effect: Not significant effect.
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: Bleak House (NHLE 1239493) and other listed buildings at Broadstairs identified at Table 7.9.	No effect predicted	No mitigation is proposed.	No effect predicted
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: St Peter's Church, Sandwich.	No effect predicted	No mitigation is proposed.	No effect predicted
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: Clifftop Conservation Area and Walpole Bay Tidal Pool.	Potential Minor effect: not significant effect.	No mitigation is proposed.	Potential Minor effect: Not significant effect.
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: Clifftop Conservation Area as identified at Table 7.9	No effect predicted	No mitigation is proposed.	No effect predicted
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: scheduled double ring ditch and two enclosures north-west of Danes Court (NHLE 1004230).	No effect predicted	No mitigation is proposed	No effect predicted.

Description of impact	Impact	Possible mitigation measures	Residual impact
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: scheduled Anglo-Saxon cemetery, Dane Valley Road (NHLE 1003601).	No effect predicted	No mitigation is proposed	No effect predicted
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: Deal Middle Street Conservation Area, the Scheduled Artillery Castle and Selected Grade II Listed Buildings.	No effect predicted	No mitigation is proposed.	No effect predicted
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: Dover Castle.	No effect predicted	No mitigation is proposed.	No effect predicted
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: Dover Patrol Monument.	No effect predicted	No mitigation is proposed.	No effect predicted
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: non-designated enclosure at Ebbsfleet Hill.	No effect predicted	No mitigation is proposed.	No effect predicted
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: Kentlands and The Lodge at Sandwich Bay Estate.	No effect predicted	No mitigation is proposed.	No effect predicted
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: Kingsgate Conservation Area, Holland End, Holland House and Kingsgate Castle	No effect predicted	No mitigation is proposed.	No effect predicted
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: other listed buildings in Kingsgate Conservation Area as identified in Table 7.9.	No effect predicted	No mitigation is proposed.	No effect predicted
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: Grade II listed Port Regis School, Kings Gate and Hackemdown Tower	No effect predicted	No mitigation is proposed.	No effect predicted
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: Margate Conservation Area.	No effect predicted	No mitigation is proposed.	No effect predicted
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: Paragon Court (NHLE 1088960).	No effect predicted	No mitigation is proposed.	No effect predicted

Description of impact	Impact	Possible mitigation measures	Residual impact
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: other listed buildings within the Margate Conservation Area as identified at Table 7.9.	No effect predicted	No mitigation is proposed.	No effect predicted
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: Margate Seafront Conservation Area.	No effect predicted	No mitigation is proposed.	No effect predicted
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: North Foreland Lighthouse including attached Lighthouse Keepers' Houses (Grade II Listed, NHLE 1222802).	No effect predicted	No mitigation is proposed.	No effect predicted
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: Pegwell Bay WWII Anti-Invasion defences (Grade II Listed, NHLE 1413803).	No effect predicted	No further mitigation is proposed as exclusion zones and planting are considered as embedded mitigation.	No effect predicted
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: Ramsgate Conservation Area and selected listed buildings.	No effect predicted	No mitigation is proposed.	No effect predicted
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: Reculver Saxon Shore Fort, Anglo-Saxon Monastery and Associated Remains.	No effect predicted	No mitigation is proposed.	No effect predicted
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: Richborough Castle, Saxon Shore Fort, Roman Port and Associated Remains.	No effect predicted	No mitigation is proposed.	No effect predicted
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: Royal Sea Bathing Hospital, Margate.	No effect predicted	No mitigation is proposed.	No effect predicted
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: Sandown Castle.	No effect predicted	No mitigation is proposed.	No effect predicted
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: Seven Stones House.	No effect predicted	No mitigation is proposed.	No effect predicted
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: South Foreland Lighthouse.	No effect predicted	No mitigation is proposed.	No effect predicted

Description of impact	Impact	Possible mitigation measures	Residual impact
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: Walmer Artillery Castle.	No effect predicted	No mitigation is proposed.	No effect predicted
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: Walmer Seafront Conservation Area	No effect predicted	No mitigation is proposed.	No effect predicted
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: setting and historic landscape character of the Wantsum Channel.	No effect predicted	No mitigation is proposed.	No effect predicted
Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: Westgate-on-Sea Conservation Area and Grade II Listed Westgate-on-Sea British Legion War Memorial.	No effect predicted	No mitigation is proposed.	No effect predicted

## 7.18 References

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