



Mr. Rynd Smith
National Infrastructure
Temple Quay House
2 The Square
Bristol BS1 6PN

**Environment, Planning and
Enforcement**

Invicta House
County Hall
Maidstone
ME14 1XX

Phone: 03000 412818
Ask for: Hannah Clement
Email: Hannah.Clement@kent.gov.uk

BY EMAIL ONLY

15 January 2019

Dear Mr. Smith,

**Re: Application by Vattenfall Wind Power Limited for an Order Granting
Development Consent for the Thanet Extension Offshore Wind Farm – Written
Representation Submission**

Following the Planning Inspectorate's Rule 8 letter dated 18 December 2018, Kent County Council (KCC) submits its Written Representation.

KCC has set out its position in relation to the proposed development in a Relevant Representation submission and is engaging with Vattenfall Wind Power Ltd on the matters raised. A general update on the principal submissions outlined in KCC's Relevant Representation is provided below.

This letter should be read in conjunction with the detailed comments for clarification and/or additional information set out in the County Council's response to the Examining Authority's First Written Questions and the Local Impact Report. The letter has been prepared in accordance with Planning Inspectorate Advice Note 8.4.

In summary, the principal issues that KCC has made in relation to the application concern:

- Highways and transportation, as the Local Highway Authority for Kent;
- Public Rights of Way (PRoW);
- Country Parks, as land owner and manager of Pegwell Bay Country Park;
- Waste;
- Biodiversity; and
- Heritage.

Highways and Transportation

KCC, as the Local Highway Authority for Kent, has agreed that no further capacity assessment of the highway network is required, beyond that already included in the application. The proposed site access points have been agreed in principle between Vattenfall and KCC.

As stated in the Local Impact Report, in principle, the site access points, traffic management and mitigation during construction are acceptable. The detailed measures for each access point will need to be agreed through submission of the Construction Traffic Management Plan.

Public Rights of Way

As stated in the Access Management Strategy, the England Coast Path and Thanet Coast Path will be obstructed for a number of months by the construction of the landfill site and transition pit.

If path closures are required, they should be kept to a minimum to minimise disruption for path users and an alternative route should be provided for the duration of the closure. KCC's PRow Officers would need to be consulted on any closures and alternative routes so that the Council can update and inform coast path users and the National Trail website.

Country Parks

KCC acknowledges and welcomes the recent change to the DCO application by removing the proposed Option 2, which involved laying an overground berm through Pegwell Bay Country Park. When considering the implications of the scheme on the Pegwell Bay Country Park, KCC supports either Option 1 or 3 for the onshore cable route, which would lead to less significant impacts on the Country Park.

Within the Local Impact Report, it is stated that KCC is concerned about the negative impacts on the users of the Country Park during the construction of the onshore cable. Lessons learnt from the development of the NEMO link show that the construction process is highly disruptive and KCC requests the applicant works closely with the relevant officers to ensure the park remains open and accessible during the construction phase.

Waste

As stated in the Local Impact Report, any incursions into the landfill site or breaches of the sea wall (which would be required for options 1 and 3) will need to be engineered to consider the historic potential environmental difficulties associated with this site. In particular, this would include ensuring that no new pathways for the migration of landfill gas or leachate are created.

Biodiversity

The 'Saltmarsh Mitigation and Reinstatement Plan', submitted as part of the DCO application, is very important to ensure that the appropriate mitigation can be implemented. It will also ensure that the site will be monitored, and additional works implemented, if the monitoring identifies that the habitat is not re-establishing as proposed.

A Habitat Regulation Assessment (HRA) screening report has been submitted and confirms that a full HRA will be required. The Planning Inspectorate will need to carry out the HRA and sufficient information will need to be submitted by the applicant to enable this to be completed.

Heritage

Onshore Historic Environment

KCC would advise that if non-designated assets associated with the defenses are encountered along the cable route, then it may be appropriate (depending on their form and preservation) for consideration to be given to avoid physical impacts through the design of the cable route, rather than a programme of recording. Further detail on the impacts can be found in the Local Impact Report.

Offshore Historic Environment

KCC advises that an Archaeological Written Scheme of Investigation is required, to include an Archaeological Exclusion Zone, which will need to be agreed with KCC and Historic England. KCC welcomes further collaboration with wider stakeholders, as detailed in the Local Impact Report, to continue with sampling and requests specialist input on the offshore assets.

KCC looks forward to working with the applicant and Planning Inspectorate as the project progresses through the Examination process and will welcome the opportunity to comment on matters of detail as may be required throughout the Examination.

Should you require any additional information or clarification, please do not hesitate to contact me.

Yours sincerely,



Stephanie Holt-Castle

Interim Director - Environment, Planning and Enforcement