

14 January 2019

Kent and Essex Inshore Fisheries and Conservation Authority
Paragon House
Albert Street
Ramsgate
Kent
CT11 9HD

National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

By Email

Dear Sir/Madam

Application for a Development Consent Order – Thanet Extension Offshore Windfarm

The Examining Authority accepted the Kent and Essex Inshore Fisheries and Conservation Authority's (KEIFCA) request for relevant representation on the 10th December 2018. KEIFCA have subsequently reviewed the application details for the proposed development and provide the following representation.

The role of KEIFCA is to lead, champion and manage a sustainable marine environment and inshore fisheries within the district, by successfully securing the right balance between social, environmental and economic benefits to ensure healthy seas, sustainable fisheries and a viable industry.

Our relevant representation outlines details of the proposed development that require further clarification and mitigation to ensure that the development minimises its impact on the designated protected areas and fisheries within the district.

KEIFCA supports the renewable energy industry and welcomes further discussion on any of the points raised here. KEIFCA reserve the right to amend our advice in response to any future changes made by the applicant regarding the proposed development.

Commercial Fishing Industry

6.2.6 Environmental Statement Volume 2 – chapter 6 Fish and Shellfish Ecology

A variety of fishing activity takes place within the vicinity of the windfarm extension area and the proposed offshore export cable corridor (OECC). Lobster, crab and whelk potting takes place throughout the year in both sites, with whelks being intensively fished along

sections of the proposed OECC. The whelk and cockle fisheries in the area are the highest grossing species caught and are significant to the local industry.

KEIFCA are concerned over the loss of fishing grounds and the impact that displaced fishing activity may have to the surrounding area. Information regarding the areas most likely to experience increased fishing pressure due to displacement was not provided in the ES and should undergo further consideration.

Cumulative Impacts

6.2.5 Environmental Statement Volume 2 – Chapter 5: Benthic Subtidal and Intertidal Ecology

KEIFCA require further information regarding the time, location and duration of the disposal of the 1.728 million cubic metres of material that will be produced during construction. The inshore district of Thanet experiences a high level of construction and maintenance activity throughout the year with Ramsgate harbour regularly undertaking dredging campaigns, and the recent installation of the Nemo Link cable. KEIFCA are concerned about the cumulative effects that the disposal of material may have on the nearby Pegwell bay, the adjoining SAC and fishing activities in the district. These continual dredging activities were not sufficiently considered in the ES and should be included in future assessments.

In addition, the baseline data used for the assessment is dated prior to the installation of the Nemo Link cable and, therefore, it only considers the impact of the proposed project on the previous environmental baseline and not the cumulative impacts associated with the recent Nemo Link installation. We suggest that further supporting evidence from the post-construction monitoring reports of both the Nemo Link and the Thanet Offshore Wind Farm export cable be provided to show the recovery status of the habitat.

Section 5.13.1 of the ES states that the 'Cumulative effects refer to effect upon receptors arising from Thanet Extension when considered alongside other proposed developments and activities and any other reasonably foreseeable project(s) proposals.' KEIFCA note that the assessment does not consider the impacts of post-construction developments in the district, that, in combination with the proposed development would result in a greater impact. A cumulative impact assessment that is relevant to the temporal and spatial scale of the development and habitats in the district should be considered.

Impacts to Pegwell Bay SAC

6.2.5 Environmental Statement Volume 2 – Chapter 5: Benthic Subtidal and Intertidal Ecology

KEIFCA disagree with this conclusion set out in section 5.11.19 of the ES volume 2. The extension of the sea wall will cut across the saltmarsh habitat at its narrowest point. The Environmental Statement (ES) does not provide any further information regarding the potential for local erosion as a result of the sea wall extension which could cause separation of the habitat.

The saltmarsh habitat in Pegwell bay occupies a relatively small area of the total intertidal area and is one of only two areas of permanent saltmarsh in the Eastern Channel. Surveys undertaken by KEIFCA in Pegwell Bay demonstrate that many juvenile commercial fish such as, herring, sprat, mullet and bass depend on the habitat for shelter and food.

KEIFCA would like to see supporting evidence regarding the potential for further impacts of local erosion as a result of the sea wall extension.

In addition, the installation methodology for the export cable also raises concerns. KEIFCA deem Option 1 provided in the Saltmarsh Mitigation, Reinstatement and Monitoring Plan to be the less damaging provided appropriate mitigation measures are implemented during construction. This option should, therefore, be given priority.

If you have any queries in response to this letter, please contact for further information. We look forward to continuing our work with the applicant.

Yours Sincerely,

Annabel Plumeridge,

Scientific Conservation Officer

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