



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Thanet Extension Offshore Windfarm

Planning Inspectorate Reference: EN010084

Annex E: Natural England's Response to other Relevant Representations

15th January 2019

Thanet Extension Offshore Windfarm – Response to Relevant Representations

Following submission of Natural England’s and other consultees Relevant Representations regarding the construction and operation of Thanet Extension Offshore Wind Farm, Natural England has reviewed other consultees Relevant Representations, including statutory and non-statutory consultees, and commented on the major issues within the remit of Natural England. Relevant comments from other consultees are summarised in Table 1, together with Natural England’s position on the comments.

Comment Number/ Page	Summary of Major Comments	Do they contradict or support NE comments, or is this a new issue NE needs to consider
Marine Management Organisation (covering letter)		
1.1	They object to the use of new arbitration clauses and question if they apply to the DML. Also paras 1.21-1.24 of their detailed annex.	In agreement with Natural England’s own comments.
1.2	Object to the definition of commence and query if UXO is being licenced. See para 1.7 and 1.73 of their detailed reply.	In agreement with Natural England’s own comments.
1.3	Requested change for documentation to be approved within 6 months not 8 weeks. Also requested removal of referring to arbitration if any difference noticed. See para 1.10 and 1.59 of their detailed response.	This position mostly matches with Natural England’s position, we have asked for 6-8 months.
1.4	The volumes and figures presented in the DCO not reflecting the ES project description. Requested provision of a table with these figures to ensure the assessment is accurate. See para 1.19, 1.20 and 1.59 of their detailed response.	In agreement with Natural England’s own comments.
1.5	Requested maximum figures for sandwave levelling and boulder clearance be included in the DCO/DML.	In agreement with Natural England’s own comments.
Marine Management Organisation (detailed annex)		
1.8	MMO object to the definition of benefit of the order.	This is not a concern relevant to Natural England.
1.9 +1.29	Requested the definition of the operation lifetime be included in the DCO/DML.	Natural England have raised concerns regarding the lifetime of the project but did not specifically ask for this. However, we support the inclusion of a defined lifetime.
1.10	Objection to the inclusion of the new arbitration clause.	In agreement with Natural England’s own comments.

1.11	Requests works No 2 be included in the abatement or decay of works provision.	Natural England have no position on this, however we would support this inclusion.
1.12-1.13 +1.42	Queries the number of cable crossings and requests they be included in the DCO/DML.	In agreement with Natural England's own comments.
1.14	Objects to the use of polypropylene fronds in frond matressing.	Raised within our relevant representations. Natural England's preference would be for non-plastic frond matressing.
1.15	Queries disposal volumes.	In agreement with Natural England's own comments.
1.16	Query if any rivers, streams or watercourses to have their courses altered are located above MHWS.	This is not mentioned in Natural England's comments, but Natural England agree with the point raised.
1.17	Requests max number of wave buoys be added.	Not relevant to Natural England's position.
1.18	Queries lack of max hub height in ES.	In agreement with Natural England's own comments.
1.19	Queries max cable lengths and max cable protection volumes.	In agreement with Natural England's own comments.
1.20 + 1.49	Queries scour protection volumes and requested inclusion of areas.	In agreement with Natural England's own comments.
1.21-1.24	Issues with arbitration schedule, costs, timelines.	In agreement with Natural England's own comments.
1.25	Requests the inclusion of a site integrity plan condition.	In agreement with Natural England's own comments.
1.26	Queries insufficiencies in the O&M plan.	In agreement with Natural England's own comments.
1.27	Requests a new decommissioning condition.	This is not an issue Natural England have raised. Natural England consider Decommissioning as something that needs a new licence, as has been the MMO's standard approach.

1.28	MMO requesting inclusion of standard disposal conditions.	Not mentioned in Natural England's comments specifically but Natural England agrees with the comments raised.
1.30	Notes should refer to offshore habs regs Conservation of Offshore Marine Habitats and Species Regulations 2017.	Not mentioned in Natural England's comments specifically but Natural England agrees with the comments raised.
1.31-1.41	Minor amendments to definitions.	Does not impact Natural England's position.
1.43	Minor change to the inclusion of a met mast wording.	Not relevant to Natural England's position.
1.44	Querying minor change to DML.	Not relevant to Natural England's position.
1.45	Requested change to wording to make clear no UXO permitted.	Very similar to Natural England's position.
1.46	Asks for a condition to state maximum hammer energy.	In agreement with Natural England's own comments.
1.47	Queries the cable protection.	In agreement with Natural England's own comments.
1.48	Requested inclusion of max diameter for met mast pile.	In agreement with Natural England's own comments.
1.50-1.52	Minor amendments to DML text.	Not relevant to Natural England's position.
1.53	Requests a definition for start of construction.	Natural England query how this differs from commencement?
1.54	Queries a cross referencing error.	In agreement with Natural England's own comments.
1.55	Requests a timeframe for aviation documentation.	Not relevant to Natural England's position.
1.56-1.58	Minor changes to text requested.	Not relevant to Natural England's position.
1.59	Requests pre con monitoring plans 18 months prior to construction.	This is in agreement with Natural England's position, however due to typo in our relevant representations

		we stated 8 months instead of 18 months. We have clarified this with the applicant already.
1.60	Minor query re cross referencing.	In agreement with Natural England's own comments.
1.61	Require ground preparation methodologies to be included in cable installation methodologies.	In agreement with Natural England's own comments.
1.63-1.68	Minor amendments to condition wording for WSI and navigation conditions.	Not relevant to Natural England's position.
1.69	Minor amendment to bathy survey condition.	This is not raised by Natural England position but we have no issues with this comment.
1.70	Minor amendment to monitoring condition.	This is not raised by Natural England position but we have no issues with this comment.
1.71	Requested change to during construction noise monitoring to include mitigation if needed.	Very similar to Natural England's position.
1.72	Request for in principle monitoring plan.	In agreement with Natural England's own comments.
1.73	Observation that UXO not licenced, if to be included requested change to noise reporting condition.	In agreement with Natural England's own comments.
1.74	Requested change of title of schedule 12 to Transmission system.	Not relevant to Natural England's position.
1.75	Request saltmarsh monitoring, mitigation and restoration plan condition.	In agreement with Natural England's own comments.
1.76	Clarification requested on restricted area.	Very similar to Natural England's position.
1.78-1.79	Minor amendments to DML details.	Not relevant to Natural England's position.
1.80	Query if the point of seawall restoration needs to be captured in the DML.	Not mentioned in Natural England's comments specifically but we support this suggestion.
1.81-1.82	Minor queries re buoys and typographical errors.	Not relevant to Natural England's position.

1.83	Requests condition to secure cable exclusion zone.	In agreement with Natural England's own comments.
1.84-1.92	Minor amendments to condition wording.	Not relevant to Natural England's position.
2.1	Confirmation they have reviewed ES.	Not relevant to Natural England's position.
3.1	Confirmation that the physical processes consideration in the ES was overall sufficient	Natural England's position was this was not currently sufficient mainly due to impacts from the extension of the seawall upon the saltmarsh.
3.2	Clarification requested as to why local wave energy reduction will not be measurable at sandbank or coastal receptors.	Natural England have not asked this but Natural England support this query.
3.3	Queries the cumulative assessment of Thanet piles and Thanet extension piles, contradicts their statement at 3.1 by suggesting assessment is insufficient.	Not mentioned in Natural England's comments but Natural England support this query.
3.4	Clarification requested on how cable in the intertidal channel of the river stour will remain buried.	Not a comment Natural England have raised but one we would support.
3.5-3.7	Listed as observations only. Only point of note for us is that they query the approach taken re the seawall and the saltmarsh. However, they also defer this issue to NE as they are part of the designated site.	In agreement with Natural England's own comments.
4.1	Confirms disposal site acceptable subject to the outcome of some clarifications.	Natural England state there is not enough information provided to support disposal currently with more information, as requested in the relevant representations to be provided.
4.2	Queries disposal volumes.	In agreement with Natural England's own comments.
4.3	Notes overlap of disposal site with pegwell bay and Nemo sites, and that sites cannot overlap (one area cannot be two different disposal sites).	This is more of a system issue, not relevant to Natural England.
4.4	The proposed disposal site has holes, disposal sites cannot have holes due to the system. Requested the sites cover the areas with the holes.	This does not conflict with Natural England's own comments, however any change in the disposal sites

		should be discussed with the relevant SNCBs to avoid impacts on areas of conservation importance.
4.5-4.6	Clarification requested on the number of sampling stations for contaminant sampling	Not relevant to Natural England's position.
4.7	Queries the missing of 9,600 cubic meters of disposal for met mast within the ES project description.	Natural England do not mention this specifically but we have queried the disposal volumes.
5.1	Notes the impact of O&M activities on benthos have not been assessed.	In agreement with Natural England's own comments.
5.2	MMO advises that negligible effects still need to be screened in when considering inter-related effects.	Natural England notes this comment.
5.3	Advises chapter 6.2.5 subtidal benthic reefs be updated to include the Goodwin sands rMCZ	Natural England supports this inclusion.
5.4	Challenges the assertion that no benthic features of conservation importance are present within the cable corridor that passes through the Goodwin sands rMCZ. Requests further evidence be provided.	Very similar to Natural England's position and comments.
5.5-5.11	Queries the use of core reef approach and outlines concerns with the surveys needed, methodologies and monitoring requirements	Natural England have raised similar queries within our relevant representations. However, we have fed quite extensively into the current revision of the core reef approach and await the next version after our additional comments have been answered.
5.12-5.16	Minor comments raised, mostly asking for small inconsistencies to be explained.	Not relevant to Natural England's position.
6.1	Notes the ES has mostly identified and assessed the correct fish species. However, notes some significant clarifications are required.	Natural England notes this comment.
6.2	Requests a provisional timetable of construction so they can consider overlaps with spawning sites.	Not a comment Natural England have specifically raised, but Natural England supports the request.
6.3-6.9	Detailed comments regarding impacts to Herring. Queries re which noise model is being considered. The need to address/assess behavioural impacts. Justification for model use of	Not a comment Natural England have specifically raised, but Natural England supports the request.

	swimming speeds and lack of consideration of other biological factors. Lack of modelling of impacts to eggs and larvae. Suggests additional mitigation may be needed, such as bubble curtains.	
6.10-6.11	Notes the presences of an internationally important sole spawning ground. Says more assessment is needed and that until they have further assessment they are requesting a piling restriction during the sole spawning period.	This query is not specifically mentioned within Natural England's comments. However, we defer to CEFAS for further comment.
6.12-6.17	Sand eel. Queries why they were assessed together with herring despite having completely biology and spawning seasons. Notes they did not follow the recommended approach for assessing impacts to sandeel. Have confirmed that recolonisation over time would occur, however, that where possible impacts should be mitigated potentially through timing of works to avoid spawning season (nov-feb), but no specific restrictions requested.	Similar to Natural England's position. Natural England do raise the point that sandeel are anticipated to be present in large numbers within the project area and query whether there is the potential to microsite / avoid these areas.
6.18-6.27	Minor comments: mostly minor clarifications requested on various details provided, or correction of minor errors in the ES. No significant issues raised.	Not relevant to Natural England's position.
6.28-6.29	MMO largely content with shellfish assessment. However, note that a moderate proportion of local potting occurs, not minor as detailed in the ES.	Not relevant to Natural England's position.
6.30-6.32	Observations. Minor observations on inconsistencies in the ES.	Not relevant to Natural England's position.
7.1-7.6	Underwater noise. Overall MMO supports the assessment for underwater noise. They did note that the MMMP may need to include point source mitigation such as bubble curtains. Queries the impact ranges and requests some minor clarifications.	Our advice seems similar regarding the queries raised.
8.1	Operations and Maintenance Plan. MMO raised several comments on the O&M plan requesting changes to certain items. Comment matches earlier comments raised on O&M.	In agreement with Natural England's own comments.
8.2	Minor comment raised on Fisheries co-existence plan.	Not relevant to Natural England's position.
The Crown Estate		
	No significant comments raised, just confirmation that they were the landowner of the seabed and that the applicant has an agreement for lease.	Not relevant to Natural England's position.
UK Power Networks		
	South Eastern Power Networks plc is the occupier of some onshore land that Thanet Extension will use onshore. They object to the application unless costs are agreed with them.	Not relevant to Natural England's position.
Forestry Commission		
	The forestry commission have a list of recommendations they feel need to be considered prior to a DCO being granted.	Natural England notes this comment.

1	All ancient woodland needs to be assessed, some ancient woodland is not on the Ancient woodland Inventory but are still important.	Not mentioned in Natural England's comments specifically but Natural England support the comments raised.
2	Want a full assessment of any loss of all woods and trees within the project boundary. Particular note on the risks of bisecting woodland and causing habitat fragmentation.	Not mentioned in Natural England's comments specifically but Natural England support the comments raised.
3	Compensation and buffer zones should be included as mitigating measures.	Natural England notes this comment.
4	Encourage the infrastructure design to further enhance the existing network of green infrastructure.	Not mentioned in Natural England's comments specifically but Natural England agrees with the comment raised.
5	Embed an environmental net gain principle within the scheme as supported by the governments 25 year environment plan.	In agreement with Natural England's own comments regarding any mitigation plans.
6	Locally source all timber used in construction.	Not relevant to Natural England's position.
7	The forestry commission wants to provide further advice once the final designs are chosen.	Natural England notes this comment.
National Grid Electricity Transmission plc		
	National Grid want protected provisions to be included in the DCO due to the works location near existing and consented infrastructure.	Not relevant to Natural England's position.
	Concerns that Richborough substation is within the DCO limits and the applicant could attempt to compulsory purchase. Advised interaction unlikely but close co-operation needed.	Not relevant to Natural England's position.
	Concerns that the works may cross a 132kv cable linking substations. Notes that thanet will need to ensure integrity of this cable and ensure unfettered access to the cable.	Not relevant to Natural England's position.
Trinity house		
	Trinity House formally Object to Thanet OWF.	Not relevant to Natural England specifically, but Natural England note their objection.
	The proposed site reduces the space for shipping between the coast and the original wind farm. The risk mitigation measures do not adequately reduce this risk. Current risk of a collision is 1 every 4.5 years.	Not relevant to Natural England's position.
The Coal Authority		

	No comments to make.	Not relevant to Natural England's position.
Nemo Link		
	Have identified there may be a risk to the nemo cable infrastructure and insufficient information has been provided to assess this risk. The cables will cross offshore and a full assessment of the risk to Nemo needs to be undertaken.	Not relevant to Natural England's position.
	Onshore risks to Nemo cable have also not been fully considered and there is insufficient information for Nemo to make such an assessment.	Not relevant to Natural England's position.
	Object to the inclusion of powers to acquire land that Nemo has an interest in and requires protected provisions.	Not relevant to Natural England's position.
Port of Sheerness (PEEL Ports)		
	Significant concerns regarding reduction to shipping lanes causing a significant increase in navigational risk. Also the additional transit time will cause additional wear and costs to their pilot launches and therefore increased costs.	Not relevant to Natural England's position.
London Gateway Port Ltd		
	Concerns regarding increased navigational risks. Advised the assessment of the risks has not used an appropriate methodology or considered the full impact re pilotage operations, vessel management and navigational risk. Notes that 2 of the top 15 ports in the UK are impacted representing 10.7% of the total UK throughput of goods.	Not relevant to Natural England's position.
Environment Agency 33 page response		
	Overarching major issue highlighted in summary letter is the impact to the saltmarsh in Pegwell Bay. Also the impacts under the WFD.	In agreement with Natural England's own comments.
	Benthic and subtidal. Provided detailed comments on the saltmarsh assessment highlighting several areas where they feel the assessment is incorrect or misrepresentative. Main points are impacts from seawall are permanent, would bisect the saltmarsh, the saltmarsh is a small resource within Pegwell bay, not common as implied in the ES, loss of Spa and SSSI supporting habitat.	In agreement with Natural England's own comments.
	EA object to the use of option 2 for landfall (building the seawall).	In line with Natural England's position in that we do not support landfall option 2.
	Water Framework Directive (WFD) EA consider that water quality should not have been scoped out as some substances were detected above Cefas Action level 1 and therefore water quality should have been scoped in to EIA and assessed.	Natural England did not raise this specifically, however we would support the EA's position.

	Geo-environmental desk study: the desk study identified a need for contaminant reassessment post consent. EA advise this assessment needs to be secured via a condition in the DCO.	Natural England have not raised this, as not relevant to Natural England's position.
	Flood Risk. EA are content that flood risk is appropriated mitigated within the assessment.	Not relevant to Natural England's position.
	DCO. Do not support the DCO as it includes option2 for landfall.	In line with Natural England's position in that we do not support landfall option 2.
Historic England		
	Onshore issues do not agree with the EIA assessment onshore. They want further investigation of certain onshore features. Suggested co-ordination with KCC archaeologist.	Not relevant to Natural England's position.
	Several comments on specifics of the offshore Written Scheme of investigation.	Not relevant to Natural England's position.
	They have stated they will provide detailed comments on the DCO/DML in their written reps.	Noted by Natural England.
	Raised concerns in relation to Goodwin sands, heritage assets in the area can be hidden in the sediments. They have asked for further details on how the applicant will address the risk to heritage assets.	Not relevant to Natural England's position.
Maritime and Coastguard Agency.		
	MCA is satisfied with how the applicant has assessed the risk. However, they disagree with the conclusions regarding the outstanding risk. they consider that the redline western boundary needs to be reduced.	Not relevant to Natural England's remit, however Natural England are aware that all navigation authorities have significant concerns and objections regarding the navigational risk.
MCA sunk users group.		
	Has concerns regarding the western boundary. Additionally notes the 500 safety zone will further reduce the navigational channel. They do not believe the navigational risk assessment is sufficient. They note the mitigation relies on 3 rd parties changing their operations and question if this is appropriate.	Not relevant to Natural England's position.
MOD		
	MOD has no objections to the works. Requests they be notified of the start and end of construction, max heights of the chosen turbines and the final locations of all infrastructure.	Not relevant to Natural England's position.
Public Health England		
	Are content that the risks/impacts to air quality, contaminated land and EMF have been sufficiently addressed.	Not relevant to Natural England's position.

National Trust		
	Do not consider that the explanation of why they included option 2 for cable landfall is sufficient.	Natural England have raised similar concerns regarding landfall option 2 and do not support this option.
	Supports the objection raised by Kent Wildlife Trust. This relates to the choice of option 2 over other discounted cable route options and lack of evidence to support the routes being discounted.	Natural England's have raised similar concerns regarding landfall option 2, and do not support this option.
Kent Wildlife Trust		
	Kent Wildlife Trust objects to the development. Main concerns: Use of pegwell bay landfall option and the impact to SSSI NNR SAC, Ramsar site and SPA.	Natural England has raised similar concerns regarding the Pegwell Bay landfall options and the potential effects upon the designated sites in that area. However, we have not objected to the development on the whole.
	Notes that the only route sufficiently surveyed was the Pegwell bay route. Sandwich Bay was only covered by the ornithological surveys. Therefore, they have not provided comparable ecological information to explain their choice of Pegwell Bay over Sandwich bay.	Natural England have raised similar concerns and have concerns regarding some of the data informing the landfall options at Pegwell Bay.
	Note the need to assess the MCZ impacts in combination with recently granted licence for Dover harbour aggregate extraction within the MCZ.	Natural England agree with assessing impacts on Goodwin Sands pMCZ in combination with the Dover Harbour Aggregate extraction. We have also raised concerns regarding the overall MCZ assessment which is lacking in information.
	Request evidence to support the assumption that reef would regrow over buried cables.	Natural England did not raise this query. However, we have worked alongside the applicant to develop the biogenic reef mitigation plan and hope areas of <i>Sabellaria spinulosa</i> reef can be avoided.

	Seek assurance that burial to 1m will be achieved to ensure no EMF issues.	Natural England have not requested this. Natural England sometimes deem it preferable to sometimes shallow bury the cable than to have further rock protection. This is especially true in soft sediment dominated areas where the addition of rock protection is changing the substrate type in the area.
	Want benthic monitoring to be included as a requirement on the DML.	This in line with Natural England's concerns regarding a lack in principle monitoring, in particular around Benthic monitoring. It should be secured within the DCO / DML.
RSPB		
	Do not agree with the conclusion of no adverse effect on SPA species.	Supports Natural England's conclusions that the applicant's decision to rule AEoI of the Thanet Coast and Sandwich Bay SPA is premature.
	Onshore Ornithology they support the conclusion of no significant impact on Spa, Ramsar, SSI. With the exception that they defer to the Kent Wildlife Trust concerns regarding habitat issues.	Does not support Natural England's comments. Natural England believe that they could be a significant impact upon the SPA, Ramsar and SSSI from landfall option 2 in particular.
	Note the assessment of offshore ornithology did not follow the guidance of NE or RSPB. RTD, do not agree displacement, specifically the rates of displacement used. The buffer area they suggest should be at least 6km. this concern is repeated for in combination, the in combination displacement assessment is not considered to provide enough detail	In agreement with Natural England's own comments regarding RTD displacement. Further info has been provided within our written representations.
	Do not think displacement of Auks properly assessed.	In agreement with Natural England's own comments.
	Gannet advise should use 2km buffer.	In agreement with Natural England's own comments.

	Collision Risk Modelling: Use of option 2 of the Band models is not acceptable, they suggest option1 should be used. Requested greater detail on why option 1 was not presented in the ES.	In agreement with Natural England's own comments regarding collision risk modelling. Further info has been provided within our written representations.
	They do not agree with the use of revised Nocturnal Activity Factors in the CRM. For kittiwake and large gulls there is no evidence. They acknowledged there is a peer reviewed paper for gannets, however, they are still concerned the risks may be underestimated.	Natural England have provided further comments regarding nocturnal activity factors within our written representations.
	Considers that the impacts Displacement and collision to Red Throated Diver and Auks have been underestimated, they note this is due to the developer not following SNCB guidance. Also questioned the methodology used for cumulative impact to red-throated diver.	Very similar to Natural England's position.
	Cannot currently agree with the RIAA conclusion of No AEoI for the Outer Thames estuary SPA due to impact to RTD	In agreement with Natural England's own comments.
	Auks. They consider displacement impacts for AUKS have also been underestimated, though not as badly as impacts to RTD.	In agreement with Natural England's own comments.
	Collision risk Kittiwake and Gannet. Cannot agree to the conclusions regarding the in-combination	Very similar to Natural England's position.
Topbond plc		
	General support the OWF and as they are a contractor would be interested in doing some work on it.	Not relevant to Natural England's position.
Ramsgate Town Council		
1	Fully support this application.	This does not contradict Natural England's response, as we have specific issues with the project plans but also support other aspects also.
Thanet District Council		
1	<ul style="list-style-type: none"> Supportive of proposals however have certain issues with visual impacts, air quality during construction and noise and nuisance impacts from onshore impacts. Does not object on issues above but wishes the ExA considers them carefully. Council does not wish to raise objection in terms of air quality following the analysis of the applicant's submission. Concerns previously raised regarding the potential impact on the tourism economy relate to the impact on the seascape and landscape character areas designations from the 	The issues raised by Thanet District Council are not necessarily in line with Natural England's remit, however we note the slight concern regarding the visual impacts and shipping issues.

	<p>development. This impact is not quantifiable and therefore is not brought forward as a main issue by the Council, but as a general concern.</p> <ul style="list-style-type: none"> • The Council considers that the submission deals with the concerns raised in relation to shipping and navigation issues through the changes made to the project. 	
Kent County Council		
1	<p>In summary, an outline of the principal submissions that KCC intends to make in relation to the application will concern:</p> <ul style="list-style-type: none"> - Highways and transportation, as the Local Highway Authority for Kent; - no further assessment is required. - Country Parks, as land owner and manager of Pegwell Bay Country Park; - Option 2 would not be acceptable to KCC – there will be an over ground berm and that combined with the NEMO link will cause unwanted difficulties for access and would have a detrimental visual impact. Option 1 is favoured option and supports the undergrounding of the cable. Awaiting the results of the SI works. - Waste; - Ensure no new pathways for the migration of landfill gas or leachate are created. - Biodiversity; - Expect the SMRP to be submitted as part of the application. - Heritage; - advises an Archaeological Written Scheme of Investigation should be submitted. - Public Rights of Way (PRoW) – Temporary closures should be avoided – alternative routes should be provided for the duration of the closure. 	<p>Kent County Council agree with Natural England’s preference for option 1 and option 2 not being supported. Also have similar concerns regarding landfill site and the potential for new pathways to be created.</p> <p>Other issues raised are outside of Natural England’s remit.</p>
Dover District Council		
1	<p>The representation shall relate to the following points:</p> <ul style="list-style-type: none"> • Impact of the new development in the District in particular the substation structure and associated works • Whether the cable route selection process has been addressed appropriately • The associated impacts of the proposed cable route • The visual and landscape impact of the proposed infrastructure • The impact on ecology • The level information supplied by the applicant to support their approach to the Habitats Directive. • Has the route selection been adequately addressed in respect of sufficient information for an Appropriate Assessment to be undertaken? <p>Providing further information and comment at a later stage.</p>	<p>Many of the points raised by Dover District Council mirror with the concerns raised by Natural England. In particular the impacts on ecological receptors, the cable route selection process, and impacts of the cable route.</p>
London Pilots Council		

1	Safety of Navigation for vessels boarding and landing Marine Pilots and transiting the North East Spit area.	Not relevant to Natural England's remit, however Natural England are aware that all navigation authorities have significant concerns and objections regarding the navigational risk.
United Kingdom Maritime Pilot's Association		
1	Objects to the proposed TWE extension on the grounds of its significant negative impact on the navigational safety of ships boarding and landing pilots at the North East Spit boarding ground south of the NE Spit buoy. The proposal will have a direct impact not only on ships' manoeuvring room but more importantly the increased undesirable effect on the potentially life threatening elements of already (globally recognised) generally hazardous but essential pilot boarding and landing operations from pilot boats in the area concerned.	Not relevant to Natural England's remit, however Natural England are aware that all navigation authorities have significant concerns and objections regarding the navigational risk.
UK Chamber of Shipping		
1	Despite changes to RLB still have significant concerns regarding navigation around the western extent. Traffic passing between the windfarm and the Kent coast will be squeezed further to the west, reducing as the NRA states the traffic lane width from 3km to 1km. To fill that area with turbines will simply shift commercial traffic to a suitable distance from the new boundary and increase vessel density and risk. If the developer is further requesting the required 500m safety zones around windfarms during construction, this further reduces navigable sea room, unless no turbines are placed within 500m of the red line boundary.	Not relevant to Natural England's remit, however Natural England are aware that all navigation authorities have significant concerns and objections regarding the navigational risk.
Peri Percy and Martin Jackson on behalf of Commercial Fishermen's Rights UK		
1	Objection on behalf of commercial fishermen from Ramsgate, Margate and Whitstable.	Natural note the objection, however this is outside Natural England's remit.
Winckworth Sherwood LLP on behalf of Port of London Authority		
1	The PLA is concerned about the proposals to extend the existing Thanet Offshore Wind Farm, which is located in the Thames Estuary in the approaches to the Port, due to their potential impact on the safety of maritime operations in one of the busiest parts of UK coastal waters. Whilst the proposals are outside the PLA's statutory limits, they are in close proximity to the PLA's pilot boarding locations, with that at the North East Spit most affected, and, moreover, the proposals have the potential to impact on the operation of the Port. The proposals would encroach into the existing shipping lanes, lengthening journey times into the Port for commercial services that would have to re-route around an extended wind farm.	Not relevant to Natural England's remit, however Natural England are aware that all navigation authorities have significant concerns and objections regarding the navigational risk.

	<p>The Applicant has recently modified its proposals by decreasing the western extent of the Order limits. However, this does not address the PLA's concerns regarding the reduction in sea room to the west of the wind farm which will affect the shipping corridor running north west/south east between it and the shore</p>	
<p>Bircham Dyson Bell LLP on behalf of RiverOak Strategic Partners Limited</p>		
<p>1</p>	<p>Manston Airport Redevelopment – impact on flight paths and radar systems.</p>	<p>Not relevant to Natural England's position.</p>