



**Chief Executive
White Cliffs Business Park
Dover
Kent CT16 3PJ**

**Telephone: (01304) 821199
Fax: (01304) 872445
DX: 6312
Minicom: (01304) 820115
Website: www.dover.gov.uk**

**Contact: Lucinda Roach
Direct line: (01304) 872456
E-mail: Lucinda.roach@dover.gov.uk
Our ref:
Your ref:
Date: 14th January 2019**

Dear Inspectors,

Response to Examination Questions ExQ1

PINS Ref: EN010084

Application by Vattenfall Wind Power Limited for an Order Granting Development Consent for the Thanet Extension Offshore Wind Farm

Please find enclosed Dover District Council's responses to the Inspector Examination Questions ExQ1.

Response to Examination Questions:

Ref: 1.1.39 – DDC do not have the in-house expertise to adequately comments on a Saltmarsh Mitigation Strategy and would anticipate Natural England and Kent Wildlife Trust to address this aspect of the proposal. However, DDC would expect the outline Saltmarsh Mitigation, Reinstatement and Monitoring Plan (Doc ref: 8.13) to form part of the application documents and be incorporated within the scope and provisions of the DCO.

Ref: 1.1.40 – DDC would refer to Natural England and Kent Wildlife Trust to address these aspects of the mitigation strategy due to their expertise on ecology. As above, it would be expected that post-construction mitigation is addressed within the provisions of the DCO.

Ref: 1.1.43 – Although raised in DDC's Relevant Representation (RR-029), on further consideration of the applicants submitted Appropriate Assessment and associated Annexes it is considered that this matter has now been sufficiently addressed in the submission and DDC does not wish to raise any further concerns in relation to this aspect of the proposal. This position is confirmed in DDC's SoCG (Table 5 Page 25) with the applicants and DDC would refer to Natural England in respect of any further direction on this matter. (It can be confirmed that the initial concerns related to the above ground works to the cable route, but all above ground works in relation to the cable route and landfall options have now been removed from the application.)

Ref: 1.6.1 – DDC agreed with this opinion and do wish to raise any comments in respect of this matter.

Ref: 1.16.1 – DDC is of the view that the Applicant has proposed adequate siting and design landscape and visual mitigation measures for onshore works, taking account of public access to and recreational use of the Pegwell Bay Country Park, National Nature Reserve and foreshore areas. This

is largely addressed in the submitted Outline Access Management Strategy (Doc. 8.4). In view of the nature of the proposed underground works in these areas, DDC at this stage, could not identify any further measures or steps to minimise and mitigate these matters further other than minimising as far as possible the timescale for each construction phase across these areas, minimising the work area and construction compound size and undertaking works outside of the peak summer time season.

Ref: 1.16.2 – a) The proposed outline landscape management measures to provide landscape screening measures for the proposed sub-station are considered adequate to mitigation the landscape and visual impacts of the proposed substation set out (Work No. 13 of the Draft DCO). The additional information submitted, in respect of the potential visual impact of the sub-station to address DDC's concerns raised in the S42 consultation, has been of assistance and has adequately addressed all the concerns raised. Of the two options being put forward in the Outline Landscape and Ecology Management Plan (Doc. Ref. 8.7) Option A would be the preferred scheme, due to providing enhanced landscape screening at the entry/exit onto the roundabout. The outline proposals to include retention of existing trees, additional screen planting and habitat enhancement are all welcomed and in the long term should minimise the visual impact of the proposed structures, subject to detailed consideration of the proposed tree species.

b) DDC at this stage are of the view that there is limited scope for other landscape screening or enhancement measures to address the onshore landscape and visual effects of the proposed substation development.

Ref: 1.16.3 – DDC are of the view that adequate siting and design mitigation measures have been taken to address the landscape and visual effects of cable alignments in Pegwell Bay Country Park and the National Nature Reserve, especially following the recent decision by the applicant to remove Option 2 (the above ground cable alignment and extension of the seawall).

a) (Work No.3B) DDC understand that Option (2) has now been removed from the proposals;

b) The reinstatement and management of the cable alignment from the landfall location through Pegwell Bay south west to the boundary of the National Nature Reserve (Works Nos.4 and 4A) appears to be a considered approach and route through Pegwell Bay. The development envelope has been more defined in the DCO submission and seeks to minimise the impact of the siting of the cable alignments in view of the features of the park, taking into account public accessibility, footpaths and the existing Nemo link. It should be noted that DDC did not support the originally proposed above ground works for the cable alignment or the principle of an extension to the seawall for this purpose.

c) In terms of the landscape and visual relationship between the cable alignment from the landfall location through Pegwell Bay south west to the boundary of the National Nature Reserve and the adjacent existing Nemo Link cable alignment (Works Nos.4 and 4A), due to all works now taking place below ground it is not considered there will be a long term impact on the landscape and visual relationships associated with these works. The key to minimising the impact in this location will be appropriate management of construction works and reinstatement and restoration works.

Ref: 1.16.4 – The proposed siting and design, seascape, landscape and visual mitigation measures for offshore works and in particular WTG arrays have taken account of their relationship with the existing Thanet Offshore Wind Farm and the potential differences of scale between the installed and proposed WTGs. However, DDC would suggest that the Optimum Space Layout (Fig. 12.1 in ES Volume 6 Annex 12-1 Rev A – Doc Ref 6.6.12.1) to site the array in closer proximity around the

existing offshore array may minimise the visual spread across the seascape which could mitigate the visual impact over a wider area. Any reduction in the extent of the array in a southerly direction could remove DDC's concern regarding the visual impact on the seascape from DDC's administrative area.

Ref: 1.17.4 – DDC are satisfied from the submitted documents that construction traffic effects are adequately managed, however DDC would refer to Kent Highways and Transportation as the Highway Authority whose comments are to be put forward through the KCC response.

Ref: 1.17.5 – DDC are content that any operational traffic effects that might arise within DDC's area are adequately managed in the submitted documents however would refer the highway safety aspects to the Highway Authority.

Ref: 1.18.5 – DDC are satisfied from the information submitted that the proposed design and mitigation measures would avoid a significant risk to public health in terms of contaminated land and potential impacts on controlled waters but would support any additional measures that may be identified by the Environment Agency and Thanet District Council. However, it is difficult to comment further until the survey investigation works have been reported. Nevertheless DDC would refer to the Environment Agency and Thanet District Council as the statutory authorities in that location unless the survey results identified a need for DDC's input.

I hope these responses adequately identify DDC current position in respect of these matters and assist the Inquiry accordingly.

Yours sincerely

L.Roach

Lucinda Roach

Principal Planner

Development Management