



Written Representation Summary

The Written Representation submitted by Kent Wildlife Trust covers the following application chapters:

- Site Selection and Alternatives
- Draft DCO
- EIA Methodology
- Intertidal Surveys
- Benthic Subtidal and Intertidal Ecology
- Saltmarsh Mitigation, Reinstatement and Monitoring Plan
- Fish and Shellfish Ecology
- Offshore Designated Sites
- Marine Conservation Zone Assessment
- Biogenic Reef Mitigation Plan
- Schedule of Mitigation
- Marine Mammal Mitigation Plan
- Marine Mammals
- Offshore Ornithology

The main points of the Written Representation are:

Lack of consideration of alternative onshore cables routes

- We believe there is a lack of consideration of alternative onshore cables routes which have not been sufficiently investigated or explained
- Avoidance of environmentally designated sites has not been followed closely enough
- It is unclear as to how certain decisions were made, specifically regarding the elimination process for other potential onshore cable routes
- We believe that the applicant should have carried out more ecological surveys along the other potential onshore cable route(s), specifically along the Sandwich Bay landfall route. At present, the ecological data submitted for the onshore cable routes are not equal or comparable

More information and details required regarding monitoring

- Stronger commitments to construction and post-construction monitoring need to be secured, including post-construction benthic monitoring
- Burial depth of the offshore cable should be at least 1.5m depth. At present the cable burial minimum target depth is 1m
- We advocate a precautionary approach to be taken and for whole site approach to be considered in terms of designated site assessments and mitigation
- A more in-depth assessment of other developments is required for thorough in-combination assessments and cumulative impacts
- More information should be provided regarding the frequency of offshore repairs, routine maintenance and checks

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