



Comments on Responses to ExQ1

PINS question number	Question	Comment on applicant's response
1.1.1	a) With reference to Chapter 4, can the Applicant provide further detail to support and explain its decision to screen out the Joss Bay and Sandwich Flats North/Bay locations for cable landfall, with particular reference to the comparative effects on designated nature conservation sites and inter-tidal habitats?	<p>There is no mention of here of why Route 7 was scoped out of the design and no justification why this route was not investigated more thoroughly. The maps/figures showing potential onshore routes and onshore environmental designations suggest that Route 7 may avoid the vast majority of designations and where overlap with designations do occur this happens to a lesser extent than the proposed route. We therefore believe that this option (Route 7) should have warranted more investigation.</p> <p>The results of the intertidal surveys show that there are fewer environmental impacts at the Sandwich Bay landfall location than at Pegwell Bay in terms of area affected, species encountered and species biomass impacted.</p>
1.1.1	b) Could the applicant please explain in full what ecological surveys were undertaken to inform its choice of landfall option (as described at paragraphs 4.9.24 – 4.9.37 of [APP-040])?	<p>The applicant explains here that 'Initial scoping surveys were not presented' as they were considered to be not of relevance to the predicted zone of influence of the proposed project. We disagree with the decision made by the applicant to not present the initial scoping surveys as we believe it would have been relevant, and also would have allowed consultees and interested parties to understand the decision making process more comprehensively. KWT have voiced our displeasure about the lack of information provided regarding alternative routes during the consultation process and asked on numerous occasions for the ecological justifications for the chosen route. This information should have been</p>



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		<p>submitted/shared and provided when requested.</p> <p>We maintain that comparable ecological studies should have been conducted along the onshore routes in order to help inform the final route choice and do not believe that the applicant has justified this in this response.</p> <p>The applicant mentions that ‘the level of granularity of the scoping site surveys, and the data resulting from them would only be used for amendments to an already selected alignment’ suggesting that the onshore route had already been decided prior to conducting the site surveys.</p>
1.1.1	c) Could the applicant please respond to the representation of Kent Wildlife Trust [RR-048] that alternative routes with less of an impact on designated areas have not been adequately assessed?	<p>We disagree that ‘alternative routes would not result in lesser impacts on designated sites’, as we have not seen the evidence that supports this claim. We believe that if the avoidance and mitigation hierarchy was followed more closely when investigating onshore route options then a more suitable route could be determined which would result in no or minimal interactions with designated sites.</p> <p>The applicant mentions that a ‘proportionate approach has been taken considering the merits of routes’, however given the local, national and international conservation/environmental importance of the site in question it seems that other ‘merits’ of the project design have been placed above environmental considerations.</p> <p>We understand that there are a number of considerations that need to be factored in to the decision making process. However, we would like to know which impacts are considered to be greater along other routes when compared to Pegwell Bay. We have not seen the evidence that from an environmental perspective the impacts will be greater along other routes/in other search areas.</p>
1.1.30	b) Could the applicant and NE please	We do not agree with the belief held by the

	<p>respond to the suggestion of Kent Wildlife Trust and the Marine Management Organisation that post- construction benthic monitoring, to include monitoring of scour protection / cable protection to measure the presence of biogenic reefs and species on the sediment overlaying the cables, should be incorporated into the conditions of the DML.</p>	<p>applicant that it is not necessary to undertake further benthic monitoring as there is 'limited justification with regards uncertainty or validation of ES predictions to do so'.</p> <p>There is no harm in undertaking monitoring of scour protection and measuring benthic habitats following construction of the windfarm therefore we believe that the applicant should follow best practice and the precautionary when it comes to monitoring and undertake these as suggested.</p> <p>The assumptions made prior to construction will need to be validated and post-construction monitoring allows this to happen, rather than assuming that all predictions are correct. The results of any post-construction benthic monitoring should be submitted to the MMO in order to add to the existing information available on offshore windfarm developments.</p>
1.1.46	<p>b) Please could the applicant clarify to what extent the ES has evaluated the cumulative impacts of the proposed dredging activity as part of the assessment for Thanet Extension Offshore Wind Farm?</p>	<p>There is a time gap of only a few months between September 2020 (predicted end of dredging activities for Dover Western Docks Revival project) and Q1 2021 (predicted commencement of offshore works for TEOWF).</p> <p>There should be a contingency plan in case the proposed dredging works are delayed. It is likely that this could be the case (given that it is not uncommon for large scale offshore activities to be delayed) and the applicant should consider that dredging may well occur after September 2020 if there are delays or unexpected events which result in temporal overlap with the offshore works for the TEOWF project.</p> <p>The fact that 'Thanet Extension was not considered as part of the cumulative effects assessment presented in the Dover Harbour Board Marine Licence application' should not be justification for the TEOWF project to disregard the dredging works and should not be justification for not considering the potential cumulative environmental impacts of both</p>

		<p>developments. If anything, the fact that the Thanet Extension wasn't considered for the Dover Harbour Board Marine Licence application means it is all the more important for the cumulative impacts of both activities to be considered now in the present application.</p>
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