

Vattenfall Wind Power Ltd

Thanet Extension Offshore Wind Farm

Appendix 15 to Deadline 3: Response to Deadline 2 submissions by Interested Parties.

Relevant Examination Deadline: 3

Submitted by Vattenfall Wind Power Ltd

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Revision A

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1 Introduction

- 1 As requested in the Rule 8 letter (PINS ref: PD-009) the Applicant has reviewed submissions by Interested Parties made at Deadline 2 and has provided responses to those. Responses to shipping interest parties can be found in Appendix 8 to this Deadline 3 Submission.

- 2 Where responses to points made have been picked up through hearings and subsequent oral summaries, or elsewhere in the Applicant's Deadline 3 submission, this is referenced in this document.

2 Comments on addition submissions from Deadline 2

Interested party	Key points raised in submission	Applicant's response
Estuary Services Limited (REP2-047/49)	Addressed in Appendix 8 to this Deadline 3 submission	
Kent Wildlife Trust (REP2-040)	Issues relating to assessment of alternatives and extent of ecological surveys in response to the Applicant's response to ExQs	These issues are dealt with in the SoCG with KWT (Appendix 22 to Deadline 3) and were explored in ISH3, the oral summary for which is submitted as Appendix [] to Deadline 3.
	Need for further benthic monitoring	The need for and commitment to monitoring including benthic monitoring is set out in the Schedule of Monitoring, Appendix 48 to Deadline 3.
	Cumulative effects associated with dredging of Dover Harbour	
MCA (REP2-041)	Addressed in Appendix 8 to this Deadline 3 submission	
MMO (REP-042)	Comments relating to the draft DCO and offshore project description	An updated position in respect of these matters is set out in the SoCG with MMO submitted as Appendix [] to Deadline 3. The Applicant has made a number of changes following the comments made by the MMO and has discussed all of these with them directly. Engagement will be ongoing.
National Trust (REP-043)	The Trust confirmed it's objection to the acquisition of its interests in its inalienable land.	This matter was discussed at the CAH and the Applicant's position on this approach to compulsory acquisition is set out in response to Action point 5 to the CAH, contained in Appendix [] to Deadline 3.

Interested party	Key points raised in submission	Applicant's response
Natural England (REP-044 and 045)	Natural England provide a submission on comments on responses to the ExQs and comments on written representations.	The Applicant has made significant progress with Natural England (NE) since Deadline 2. The current status of agreement is set out in the Statements of Common Ground with NE submitted at Appendix [], [] & [] at Deadline 3.
Port of London Authority (REP2-046)	Addressed in Appendix 8 to this Deadline 3 submission	
Sunk User Group (REP2-048)	Concerns raised regarding reduction in sea room, effects on pilotage, pilot simulation and outcomes of the NRA.	Addressed in Appendix 8 to this Deadline 3 submission
Port of Tilbury and London Gateway Port Limited (REP2-049)	Port growth as set out in the NRA and mix of vessels visiting PoT and DPWLG.	Addressed in Appendix 8 to this Deadline 3 submission
Thanet Fishermen's Association (REP2-051)	Support for KEIFCA Deadline 1 response	The Applicant responded to this specific point at IFCA-6 in Appendix 2 to Deadline 2.
	Response to MMO comments made at Deadline 1	The Applicant responded to these points at MMO-152, 154 and 163 in Appendix 2 to Deadline 2. As per actions resulting from ISH6, the Applicant continues to engage with TFA regarding outcome from the ES and the content of the Fisheries Liaison and Coexistence Plan (FLCP). The FLCP has been updated following comments from TFA and is submitted as an updated draft at Appendix 41 to Deadline 3.
Trinity House (REP2-052)	Clarification on drill stone buoy, concerns regarding safety zones and Article 16 of the dDCO	Addressed in Appendix 8 to this Deadline 3 submission

Interested party	Key points raised in submission	Applicant's response
Kent County Council – late submission post-Deadline 2 (AS-008)	I'm writing to inform you that KCC may reserve the right to attend the second CAH on the 17th April 2019. Update on works in Pegwell Bay	The Applicant notes KCCs position and further notes that the Applicant and KCC are targeting conclusion of a land agreement in advance of the second Compulsory Acquisition hearing now programmed for 18 April 2019.
KCC	<p>The land owned by KCC (Pegwell Bay Country Park) is a sensitive and designated National Nature Reserve. Unfortunately, beneath the surface is also a former landfill site. Excavations on this site proposed by Vattenfall present an obvious risk to Vattenfall and KCC as landowner, as well as the public who frequently use the Nature Reserve and Country Park and will continue to do so during the works.</p> <p>It is these issues that we have asked Vattenfall to address in detail now, rather than at a later stage.</p>	<p>The Applicant has clarified with KCC that detailed plans and proposals dealing how the specific characteristics of the land as:</p> <ul style="list-style-type: none"> • Designated National Nature Reserve • Former Landfill Site • Accessible Land <p>Will be taken account of and managed during the site investigation works.</p> <p>The Applicant has further agreed with KCC (1.3.19) that they will produce a similar suite of documents in advance of the cable installation works themselves but that those will not be produced until the post consent pre-construction phase.</p>
KCC	Reliance by Vattenfall on the non-detailed overarching Code of Construction Practice (CoCP) does not fully set out the methodology for the dealing with excavated material, for example.	The Applicant has provided copies of the Construction Code of Practise to KCC and is engaged in a process of dialogue with them with a view to agreeing the terms of an option agreement where matters of further detail might be specified.
KCC	The CoCP does recognise the existence of the Closed Landfill site and the need for survey works prior to main works commencement is welcomed.	The Applicant notes KCCs position.

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KCC	However, the excavation of trial pits also presents a risk to the landowner and a methodology is expected by KCC.	The Applicant is in the process of agreeing with KCC detailed plans, proposals and methodologies for the site investigation works.
KCC	KCC have also asked Vattenfall for information relating to indemnification from the costs incurred from any future contamination and also commentary on contaminated land gas leachate via a vis installed electricity cables.	The Applicant is engaged in a process of dialogue with KCC with a view to agreeing the terms of an option agreement where matters of further detail might be specified.
KCC	The site is open to the public and KCCs concerns are reasonable.	The Applicant agrees and has proposed an Access Management Strategy. The Applicant will agree the detailed arrangements for managing public access around the site investigation works with KCC.
KCC	The increase in traffic caused by the Scheme is predicted to be Major on Sandwich Road and therefore assumed to be major within the publicly accessed Pegwell Bay Country Park also (Document 6.3.8/Environmental Statement Volume 3/Chapter 8 Traffic and Access - 8.11.42 to 8.11.53).	The traffic effects on Sandwich Road are predicted to be of minor significance following embedded mitigation, namely the Construction Traffic Management Plan (CTMP). The measures secured relating to the CTMP are found in the CoCP (PINS Ref APP-133) and these principles have been confirmed by KCC as being accepted in the Local Impact Report (PINS Ref REP1-098). As such the Applicant does not consider that there will be significant effect on traffic either on Sandwich Road or within Pegwell Bay Country Park.
KCC	It is not obvious to KCC how such large increases in traffic will be dealt with within the Country Park and Nature Reserve with the Construction Traffic Management Plan (CTMP) being a document to be submitted post consent (Document 6.3.8 – 8.9.1). As	The requirement to submit a CTMP for approval is a pre-commencement requirement of the DCO. The principles for the CTMP include measures such as site speed limits and control of movements (e.g. banksmen) and this, along with the Access Management Strategy (PINS Ref APP-136) will

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	above, this could be dealt with as a pre-commencement condition.	ensure that traffic is suitable management both on the highway and on site.