



Tuesday 10th December 2019

To: ThanetExtension@planninginspectorate.gov.uk

Cc: Daniel Bates, Vattenfall Consents Manager - daniel.bates@vattenfall.com

Response to the request for information and comments on the Thanet Extension Offshore Wind Farm application - EN010084

(Substation location)

Dear Mr Gareth Leigh,

In response to the 'Request for Information and comments on the application – EN010084', Kent Wildlife Trust would not support the substation being built on the Bay Point Club due to the proximity of this site to the Kent Wildlife Trust Stonelees Nature Reserve. The Stonelees Nature Reserve is located directly north of the Bay Point Club and therefore Kent Wildlife Trust would have concerns about the impacts of substation construction and maintenance operations on the wildlife of the area, particularly during the construction phase due to increased noise levels and activity over the predicted 24 month construction period. We believe that the potential for environmental disturbance is likely to be higher if the substation is constructed at the Bay Point Club compared to the proposed substation site location.

We would also like to voice our concerns regarding the BCA Fleet Solutions 'substation site' which has also been suggested (paragraph 8). Although situated at a further distance from the Stonelees Nature Reserve, it is likely that the BCA Fleet Solution substation site has the potential to cause more disturbance to seals when compared to the originally proposed substation site. The River Stour is an important foraging and breeding area for seals and all of the three proposed substation sites are located close to the Pegwell Bay seal colony. Therefore it is important that for whichever substation site is selected, if consent for the project is given, the impacts to the seals and seal colony area are minimised and commitments made to ensure work is carried out in this area at times when the seals are least sensitive to disturbances (e.g. during non-breeding season). The seals are thought to use most of the River Stour and can travel relatively far inland along the river, however, they are most commonly observed at the mouth of the river and the more northerly reaches of the river. Therefore as the proposed substation site is located furthest south of the three presented possible options, we believe that there would be fewer direct and indirect impacts to the seal colony and to the Stonelees Nature Reserve if this site is selected.



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With this in mind, Kent Wildlife Trust believe that the proposed substation site (currently owned by Ramac Holdings (Trading) Limited (“Ramac”)) would be the least damaging and disturbing option in terms of environmental impacts.

These comments are made without prejudice to Kent Wildlife Trust’s long-standing objection to the offshore cables for the Thanet Extension making landfall at Pegwell Bay due to the environmental designations at this landfall site. (Full details of the Kent Wildlife Trust objection to this landfall site can be found in the Kent Wildlife Trust Response to the Preliminary Environmental Information Report (PEIR) (Jan 2018); Relevant Representation (Sept 2018); Written Representation (Jan 2019); verbal and written cases made at the Environmental Issue Specific Hearing (Feb 2019); and Statement of Common Ground (May 2019) submitted as part of the planning and consultation process).

Yours sincerely,

Ms Alice Morley,

Marine Conservation Officer, Kent Wildlife Trust