

Thanet Extension Project Team  
Secretary of State for Business, Energy & Industrial Strategy  
c/o The Planning Inspectorate  
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**By Email and Special Delivery**  
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12 December 2019

Dear Sirs

**Application by Vattenfall Wind Power Limited for an Order granting Development Consent for the proposed Thanet Extension Offshore Wind Farm off the Coast of Kent  
Request for Information and Comments on the Application - EN010084  
Our Client: Ramac Holdings (Trading) Limited**

We thank you for your letter of 21 November 2019.

We confirm we are instructed on behalf of Ramac Holdings (Trading) Limited, and write to respond to the matters raised on behalf of our client in your aforementioned letter.

**In short, we confirm that Ramac Holdings (Trading) Limited has not concluded a commercial agreement with the Applicant on the powers sought by the Applicant in relation to Ramac Holdings (Trading) Limited's land.**

**Accordingly, Ramac Holdings (Trading) Limited does not withdraw its objections.**

Without wishing to trouble the Secretary of State by repeating matters already addressed by way of submissions within the DCO process, we should like to highlight at this stage the following matters:

1. Ramac Holdings (Trading) Limited first raised objections in response to pre-application consultation almost two years ago, in January 2018.
2. The first all parties settlement meeting took place at Vattenfall's London offices on 9 January 2019.
3. Ramac Holdings (Trading) Limited then attended both Compulsory Acquisition Hearings on 21 February and 18 April 2019, on both occasions raising concerns about the selection of its land for the onshore substation, the proposed siting of the substation within its landholding and the extent land take proposed.
4. Detailed written submissions were subsequently made by Ramac Holdings (Trading) Limited dated 28 May 2019, upon which our client relies.

5. A joint statement submitted at Deadline 6 by both Ramac Holdings (Trading) Limited and the Applicant records continued negotiations between the parties, with both parties being hopeful an agreement could be reached. It is also noted that in the same response it is stated "*the parties have agreed to work towards a target date of conclusion for the transaction of 11 June 2019*". It is the position of Ramac Holdings (Trading) Limited that it and its advisers have used all reasonable endeavours to secure concluded agreements and it is most disappointing that, despite there having been ample time to do so, no commercial agreement has been concluded. The Examining Authority rightly made clear at the preliminary meeting in December 2018 that regard would only be had to any concluded agreements.

We would submit that the very fact that the Secretary of State requires further details and additional evidence from the Applicant at this late stage is most telling.

It is our client's position that the Applicant has had more than ample opportunity to put forward detail and evidence to support its case, but has failed to adequately do so throughout the whole DCO process. It is our client's case inter alia that the assessment of alternative sites and justification asserted for the land take on the application documents were entirely unsatisfactory, evidenced by the fact the Applicant's initial position was that "*land ownerships are still under consultation with all relevant parties and will be taken forward in the Post-Consent phase*". We submit further the detail/evidence submitted by the Applicant via the DCO process was also lacking.

It accordingly remains our client's position that the Applicant has failed to demonstrate a compelling case in the public interest to support the compulsory acquisition in respect of our client's land, and Ramac Holdings (Trading) Limited maintains that the Applicant should be refused the powers of compulsory acquisition it seeks in all the circumstances.

If the Secretary of State is to receive/accept any further detail or evidence from the Applicant, our client requests a reasonable opportunity to consider the same and prepare submissions/evidence in response. Given the forthcoming Christmas holiday period, we would ask that any deadline should be no earlier than 24 January 2020.

We will be making submissions on costs in due course.

We trust the above assists the Secretary of State, but if any further information or clarification is required, please do not hesitate to contact our reference.

Yours faithfully

Charles Russell Speechlys LLP