

# **Thanet District Council Written summary of Oral Submissions Made at ISH3**

Thanet District Council

Sea Link Development Consent Order – EN020026

April 2026

## Introduction

- 1.1.1 Thanet District Council (TDC) was represented by [REDACTED] (Planning Officer) at the Issue Specific Hearing 3 (ISH3) which was a hybrid event with [REDACTED] attending remotely and supported by [REDACTED] (Environmental Health Officer) and [REDACTED] (Coast and Engineering Services Manager) also representing TDC and attending remotely.
- 1.1.2 This document sets out the written summaries of the oral submissions made by TDC. The written summary follows the structure of the ISH3 Agenda items whilst it is acknowledged that the items at the hearings were not discussed in this order. The summary omits any agenda items where TDC did not provide an oral submission.

## Written Summary of Oral Submissions

### Item 4. Traffic and Transport

- 1.1.3 **Junction Modelling** – TDC are concerned that the junctional modelling is based on a list of cumulative sites that is out of date and missing a number of sites which TDC has previously raised. Therefore, TDC would like to confirm if the junction capacity modelling will be updated once the list of cumulative sites is updated as planned at Deadline 6 to take into consideration developments post March 2025.

### Item 5. Socio-Economics and Tourism

- 1.1.4 **Tourism** - TDC would welcome monitoring of the impact on tourism accommodation. Due to the location of the development demand is likely to be highest in the Thanet District. As highlighted previously TDC have concerns regarding bed space and accommodation.
- 1.1.5 It is acknowledged that whilst Suffolk has multiple DCOs there is the potential for similar effects to be experienced in Thanet due to Sea Link, Manston Airport and a large number of residential developments that are coming forward in the area.
- 1.1.6 TDC confirmed that a statement has been provided by the TDC Tourism and Culture Manager which would be provided in writing. This has been provided in response to ISH3 Action Point 28.
- 1.1.7 **Skills and Employment Plan** – Whilst not raised at ISH3, TDC would like to confirm that TDC met with the Applicant recently to discuss a Skills And Employment Plan. We would welcome a Requirement and support the wording suggested by Suffolk County Council (SCC).

### Item 6 – Health and Wellbeing

- 1.1.8 **Core working hours** – TDC agreed with the points raised by SCC and East Suffolk Council (ESC) that the exceptions to the core working hours are too extensive and there is a need to understand the full scope of these exceptions with a view of limiting these to true exceptions. When taken with the start up and close down hour either side of the core working hours it gives the Applicant a broad scope to

undertake construction activities outside of the core working hours which undermines the purpose of having core working hours set out in Requirement 7.

#### **Item 7. Cultural Heritage**

- 1.1.9 TDC has no additional comments to make in relation to listed buildings and associated assessments.

#### **Item 8. Cumulative Effects**

- 1.1.10 Our position is similar to that of ESC and is outlined within our ISH2 Additional Questions submission. We await submissions by the Applicant at Deadline 6 and the outcome of discussions arising from the relevant Action Point. In particular we look forward to meeting with the Applicant and having sight of their response to the Action Point in relation to landscape and visual effects and consideration of mitigation as the ExA have highlighted. Specifically, as it appears that no further mitigation can be proposed to mitigate the effect on the PRoW to address these impacts.

#### **Item 9. Marine Physical Environment**

- 1.1.11 **Exit and Entry Pits across the trenchless crossing works** – TDC would welcome the exit and entry points to be georeferenced and set out as a specific works no.
- 1.1.12 **Use of pneumatic casing** – with regards to the use of pneumatic casing, also relevant to other coastal foreshore issues, clarification is sought on the Applicant's definition of foreshore. It is related to the use of pneumatic casing amongst the other issues, but the Applicant refers to the intertidal zone as offshore when it could be more specifically and accurately referred to as foreshore and nearshore. The Seaward HDD drill pit has been described as offshore, which may lead to the misunderstanding that the HDD pit is located further seaward than it is. This has now been clearly defined on drawings in the latest suite of documents as being located on the foreshore rather than offshore.
- 1.1.13 Furthermore, with regards to the drilling fluids referred to in Design Development Report [APP-321], Paragraph 2.3.6 of Appendix A states that bentonite is recognized on the OSPAR list of substances used and discharged offshore when referring to the Seaward drill pit, which is actually located on the foreshore. Therefore, it needs to be confirmed that appropriate mitigation has been proposed and secured for the use and discharge of bentonite in the foreshore area. Generally, offshore has been used ambiguously when it should be foreshore.

#### **Item 10. Noise and Vibration**

- 1.1.14 **Section 61 application** – TDC welcomed ExAs consideration of the proposed wording set out in response to ExQ2 2NV3 as set out by TDC [REP5-207]. In addition, TDC requests the commitment NV03 in the REAC which requires the contractor to carry out a detailed noise and vibration study is updated to require all updated noise and vibration assessments to be submitted to and approved by the relevant Local Planning Authority prior to confirming if a section 61 application is required.

- 1.1.15 This is effectively a precursor to a section 61 application which allows TDC to assess the potential noise and vibration impacts from construction and if these are significant a section 61 application can be required.
- 1.1.16 TDC welcomes the recommendation for East Suffolk Council, TDC and the applicant to meet separately and confirm the appropriate approach and wording in relation to noise and vibration matters and a section 61 application.
- 1.1.17 **Construction vehicle noise assessment in Pegwell Bay** – TDC are content with the methodology used to assess the noise impact.
- 1.1.18 **Operational noise emissions from converter stations and substations including, but not limited to, low frequency noise emissions and evidence to demonstrate that 5dB below background level is unachievable** – TDC accepts that 34dB background noise is very low and would likely have a negligible impact on the nearest residential receptor that is over 500m away. However, the Kent Operational Noise Assessment at table 1.6 shows 5dB below background noise levels is achievable as it states a -12dB rating during daytime and a -6dB at nighttime. Therefore, if it is stated in the ES it is unclear how it cannot be achieved.
- 1.1.19 In response to ExQ2 2NV1, TDC requested day and night time noise limits of
- 30dB (LAeq,T) at NSR - daytime
  - 24dB (LAeq,T) at NSR - nighttime
- 1.1.20 As well as an assessment of low-frequency noise to be undertaken. The difference between the C-weighted and A-weighted equivalent continuous sound pressure levels (LCeq,T – LAeq,T) measured at the nearest noise sensitive receptor shall not exceed 10dB.
- 1.1.21 TDC welcomes the suggestion from ExA for a tripartite meeting between TDC, East Suffolk Council and the applicant to agree a requirement for operational noise.

### **Item 11. Air Quality**

- 1.1.22 **Traffic emissions assessment** – TDC have no further comments on this matter.
- 1.1.23 **Operational back-up generator assessment** – TDC are content with the human health aspect of REAC provision AQ11 in terms of location of the back up generators.

### **Item 13. Ecology and Biodiversity**

- 1.1.24 **Pegwell Bay and former hoverport access and disturbance** – TDC were asked to confirm whether it is now satisfied with the applicant's proposals in response to second written questions for access via the hoverport in terms of use of track matting but no wheel wash, and the provision of a hoverport condition monitoring plan. TDC confirmed that a response would be provided in writing.
- 1.1.25 **Biodiversity Net Gain** – TDC confirmed no further comments in relation to biodiversity net gain.