

Thanet District Council Response to Action Points from ISH3

Thanet District Council

Sea Link Development Consent Order – EN020026

April 2026

Action	Description:	Thanet District Council Response:
General		
1.	Submit any suggested drafting (whether relating to matters raised in ExQ3 or not) which you consider should be included in the draft Development Consent Order (dDCO), with reasons why you consider it is necessary.	TDC refers to previous submissions which have provided wording for the various requirements and refers to our submission under ExQ3 accompanying this document, for recent comment.
Traffic and Transport		
11	The ExA requires the applicant to work with the County Councils (as Highway Authorities) to consider how any caps to HGV movements could be secured with wording also submitted, should the Secretary of State deem that capping is necessary. Please confirm whether this should be a requirement or part of a control document for securing the caps. This should also include which road links and junctions capping should be set and how the numbers of HGVs would be derived at to set the cap.	TDC defer to Kent County Council (KCC) as Highway Authority.
18.	If there are traffic delays due to proposed development construction traffic, either alone or in combination with other developments, is it likely that alternative routes would be taken by the public in their vehicles, potentially having an impact on more minor highways? If so, has this been assessed and is there actions needed to avoid this?	TDC defer to KCC as Highway Authority.
Socio-economics and tourism		
24.	The ExA require that the Councils work together and provide wording for a requirement within the DCO, if the Councils considered it necessary, for the monitoring and possible adaptive management in regards to tourism impacts.	TDC is keen to work alongside the other Councils to provide wording for a requirement within the DCO in relation to the monitoring and possible adaptive management of tourism impacts. However, due to the timeframe between the ISH3 and Deadline 6 it has not been possible to undertake this Action Point for this submission.
27.	If there was to be a Skills and Employment Plan submitted by the applicant which would be considered acceptable by the Councils, would this be sufficient to overcome any remaining concerns relating to economic impacts?	As set out in the updated versions of Principal Areas of Disagreement Summary Statements (PADSS) [REP5-186] TDC would welcome a skills and employment plan but request the inclusion of a local education strategy and engagement with local education providers. It would be a good opportunity to capture these potential benefits and the site would provide considerable educational opportunities beyond the employment elements. TDC would welcome the Applicant considering the inclusion of a local education strategy and in doing so would resolve any remaining concerns relating to economic impacts. However, this is notwithstanding the impacts on tourism which represents nearly 20% of Thanet's economy.
28.	Are there remaining concerns with regard to the potential displacement of tourists by workers of the proposed development (or in combination with other workers of other developments in the area) in tourist accommodation?	<p>As a coastal destination, the Visitor Economy is a vital sector for the local economy, supporting 8,257 jobs across Thanet. This accounts for 19% of total employment and is valued at £349 million, based on 2023 data Cambridge Model Economic Impact Report for Thanet. The impact of meeting the proposed peak accommodation demand in July 2028, with an estimated 169 construction workers involved in the Kent Onshore Scheme, will significantly disrupt the local visitor economy.</p> <p>This is particularly an issue for Ramsgate on the basis that it has the lowest number of bedstock in the Thanet district. On the basis that the development is in the district of Thanet, it is likely that the highest demand for accommodation will be here. The reports indicate that at the peak of construction in July 2028, 93% of the total accommodation capacity is expected to remain available for the public. However, this does not reflect what is observed locally and through anecdotal evidence. It is noted that this calculation is based on figures for Kent within a 60-minute drive which does not account for the higher occupancy levels experienced in the summer months in Thanet, as a prime coastal destination.</p> <p>The longer-term impact on the district of people being unable to stay locally is that they may consider there is not enough accommodation and only visit Thanet as day visitors. Additionally, if the bedstock is filled with workers, rather than visitors, they will not be spending the same amount of money in the local economy, and this will have an impact on the wider sector, outside of the accommodation.</p>

		<p>TDC would also like to raise a number of points from the Visitor and Tourism Assessment Technical Note - Kent [REP3-066]:</p> <ol style="list-style-type: none"> (1) Accommodation Capacity: The applicant's "worst-case scenario" estimate of 67 average FTE workers needing accommodation in July does not align with TDCs local experience. TDC typically see little to no vacancy during the peak summer season. (2) Growth in Visitor Economy: Our visitor economy has grown significantly. Please refer to the 2023 economic data (2025 data is expected in October/November). While the Airbnb and private rental markets have expanded due to hotel shortages, demand still frequently exceeds supply during peak periods. (3) Increased Visitor Numbers: Since 2023, visitor numbers have risen, driven largely by the London market and attractions like Dreamland. The demand is so high during the summer season (June–September) that extra late-night trains are required to transport visitors who cannot find local accommodation. (4) Peak Workforce Demand: The estimate of 241 FTE workers required for two days represents a level of demand that cannot be met between May and October. We have historically been unable to fulfil similar large-scale requests from film productions. I can consult with the Communications team for specific evidence if required.
Health and Wellbeing		
32.	With regard to the proposed exceptions included in requirement 7, are there any that the Council considers as should be omitted or amended?	<p>TDC suggest the removal of the following:</p> <p>e) delivery to the transmission works of abnormal loads and any highway works requested by the highway authority to be undertaken outside the core working hours; - This would be secured via Construction Traffic Management Plan and should require prior approval from the Local Highways Authority - so can be removed.f) the testing or commissioning of any electrical plant installed as part of the authorised development including undertaking of any identified corrective activities;</p> <p>g) the completion of works delayed or held up by severe weather conditions which disrupted or interrupted normal construction activities; - This is very open to interpretation and seemingly allows for all construction work to be extended particularly when read with part 6 of the Requirement.</p> <p>k) intrusive and non-intrusive surveys; – This should be limited to surveys that cannot be undertaken during daytime hours – eg bat surveys, noise surveys etc.</p>
34.	All councils to work together to submit alternative wording with respect to core working hours including any restrictions and exceptions required, if the councils consider this necessary.	TDC is aware of the amended wording proposed by SCC, which are supported in principle and we await the view of the Applicant to inform further comment (incorporating the inclusion of Thanet specific works within the wording)
Cultural Heritage		
39.	Does there need to be any changes to the draft DCO or the support documents submitted by the applicant in relation to cultural heritage? If so, please set this out with alternative or additional wording.	TDC does not have any further comments in relation to cultural heritage.
Cumulative Effects		

44.	The applicant and the Councils to work together and provide a document which provides the reasonings of the parties and DCO (and/or if appropriate REAC) wording to secure the measures identified in responding to 2WQ 2CEIntra3 should the Secretary of State deem this to be necessary.	The Council is unable to update on this as discussions are yet to take place.
48.	Applicant and local authorities to develop a joint position statement with regard to the unmitigated significant residual landscape and visual effects to see if there are further mitigation measures that can be included or compensation measures to offset any residual significant effects, if the Secretary of State considers that to be necessary.	The Council is unable to update on this as discussions are yet to take place.
49.	Continue discussions with the councils to seek to identify appropriate mitigation, including measures to compensate and offset significant effects. Provide a position statement at DL6, which includes reasoning as to why the parties consider these measures to be necessary, or not, and wording that can secure such measures should the Secretary of State deem them necessary. All parties to clearly identify any deemed conflicts they consider remain with the applicant's ability to meet the requirements of the Critical National Priority test.	The Council is unable to update on this as discussions are yet to take place.
Noise and Vibration		
55.	Meet with the ESC and TDC (and if relevant KCC and SCC) for a tripartite noise meeting. The aim of the meeting: <ul style="list-style-type: none"> • draft a dDCO requirement relating to the s61 process and confirm whether s61 commitments should be on the face of the DCO or within the outline construction noise and vibration management plan (oCNVMP). • agree wording of Article 49 as it relates to both construction and operation. • draft a dDCO requirement for operational converter and substation noise limits and confirm whether noise thresholds should be on the face of the DCO or part of the REAC. 	The Council's Senior Environmental Health Practitioner attended a meeting with the Applicant and the Suffolk Councils last week. The Applicant's Acoustic Consultant is due to issue a technical note to be reviewed and agreed by the Councils. At the time of submission the technical detail had not been received.
Ecology and Biodiversity		
84.	Comment on the applicant's proposed approach to accessing the hoverport and intertidal area, including use of wheel washing as set out in its response to 2ECOL24 [REP5-135].	<p>TDC are not satisfied with the Applicant's proposals to 2nd written questions for access via the hoverport. The responses are ambiguous and fail to provide confidence that the structural stability of the concrete slabs and the contaminants contained within the structure have been fully considered.</p> <p>TDC is not satisfied that conservation of species listed on: Wildlife & Countryside Act 1981 Schedule 8, Conservation of Species and Habitat Regulations 2017 Schedules 5 & 2, and Kent that are present on the hoverport will be adequately protected during the "works".</p> <p>TDC raises the following points:</p> <ul style="list-style-type: none"> • The Applicant must Specify the type of "matt" or "tracking" that can and will be used to spread the load. • Where will the load be spread to? The load will need to be "transferred" to load bearing ground rather than "spread" over a concrete slab surface that has no support. • The matting has not been specified, therefore the land owner cannot comment on the suitability of the "matting/tracking" to transfer load to stable ground. • What non-invasive surveys will be undertaken to establish the structural stability of the hoverpad launch area? • How will the applicant determine the structural capacity of the proposed route? • Wheel washing to be undertaken in both directions, as there is potential for invasive species to be tracked back onto hoverport and any on-site contaminants, including fuel/oil back into the bay. Highway to Hoverport and Hoverport to Foreshore.

Applicants Document 7.5.3 (C) - B66

- Ground vibration could still damage the rootstock of dock plants (*Rumex* spp.) which is where the fire clearwing moth (*Pyropteron chrysidiformis*) larvae feed.
- The Pre-construction botanical survey should define priority species to avoid and/or mitigate for.
 - Sussex Emerald Moth's (*Thalera fimbrialis*) food plant: Wild Carrot (*Daucus carota*)
 - Fire Clearwing Moth footplant: Dock species' rootstock.
 - Including any species listed on: Wildlife & Countryside Act 1981 Schedule 8, Conservation of Species and Habitat Regulations 2017 Schedules 5 & 2, and Kent Nature Recovery Strategy named species – which includes orchid species
 - Temporal restrictions of high impact construction works (heavy vehicular movement, loud piling...) during:
 - Overwintering period for migratory birds
 - Larval/ breeding season for suitable rare/protected species
 - Inclusion of a detailed Habitat Restoration and Compensation Plan, distinct from general site reinstatement.
 - This plan must be prepared post-consent and detail: specific methodologies, material sourcing, and success criteria for the restoration of any temporarily disturbed habitat (saltmarsh, mudflats, and hoverport vegetation) and, if necessary, habitat compensation for any unavoidable permanent loss.
 - This plan must be agreed upon with Natural England and the Kent Wildlife Trust prior to works commencing.

The Applicant must provide additional protective measures to prevent accidental damage to plant stands from accidental encroachment during construction phase.

The Applicant must expand on the Ecologist presence to supervise construction activities throughout length of project.

Applicants Document 7.5.3 (C) - B67

- The Applicant must specify the buffer implementation in order for its adequacy to be assessed.
- The low pressure bearing plant machines must be specified in order for this to be assessed.
- What is considered low pressure?