

**Application by Vattenfall Wind Power Limited for an Order
Granting Development Consent for the Thanet Extension Offshore
Wind Farm**

Local Impact Report

Dover District Council



PINS REF: EN010084

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1. Introduction

- 1.1.1. This is a Local Impact Report (LIR) prepared by Dover District Council (DDC) to the Planning Inspectorate (PINS) regarding the application by Vattenfall Wind Power Limited for an Order Granting Development Consent for the Thanet Extension Offshore Wind Farm.
- 1.1.2. Vattenfall submitted the application under Section 37 of the Planning Act 2008 (as amended) to PINS for an Order Granting Development Consent for the Thanet Extension Offshore Wind Farm on 27 June 2018. PINS is responsible for operating the planning process for Nationally Significant Infrastructure Projects (NSIP) as defined by the Planning Act 2008 (as amended) and the Infrastructure Act (2015). NSIP applications are considered within the national policy framework identified in the National Policy Statement (NPS) for Major Infrastructure and Energy, in particular EN-1 Energy, EN-3 Renewable Energy and EN-5 Electrical Networks Infrastructure and other material considerations.
- 1.1.3. DDC is an interested party under the Planning Act 2008 (as amended) with respect to the project and joint planning authority in relation to the proposed works and will also be responsible for some of the Discharging Requirements and will become one of the Enforcement authorities for the scheme. DDC also form part of the National Nature Reserve (NNR) Management Steering Group and therefore also has an interest in respect of the impact on the NNR. In addition it has a number of other statutory responsibilities concerning environmental health.
- 1.1.4. DDC have considered the purpose of the LIR as set out in Section 60(3) of the Planning Act 2008 (as amended) and PINS Advice Notes in preparing the LIR. Therefore this document sets out details of the likely impacts of the proposed development on Dover District's administrative area. The Planning Inspectorate advise that local authorities should cover any topics they consider relevant to the impact of the proposed development on their area and should be used as the means by which their existing body of local knowledge and evidence on local issues can be fully and robustly reported. They advise that it should draw on existing local knowledge and experience. This LIR, therefore, includes a statement of positive, neutral and negative local impacts, but it does not contain a balancing exercise between positives and negatives.

1.2. Pre-application Process and Consultation

1.2.1. DDC have engaged constructively with Vattenfall throughout the development of the project via a Planning Performance Agreement and have fully responded to previous consultation as part of the formal pre-application consultation process. Vattenfall has made positive efforts throughout the process to endeavor to address any concerns raised by DDC and this has greatly assisted with reducing the residual impacts that would need to be addressed in order to make the proposal acceptable in planning terms. Where any issues are outstanding they are addressed in this report. This position is further clarified in the agreed Statement of Common Ground (SoCG).

1.3. Statement of Common Ground

1.3.1. The extent of agreement reached between the DDC and Vattenfall on the impacts of the proposed development is set out in the Statement of Common Ground (SoCG) submitted on the same day as this LIR which narrows down significantly a list of outstanding matters. DDC have sought in this LIR to constructively identify where further information and proposals are needed, to ensure that the adverse local impacts are adequately mitigated. DDC will continue to engage with Vattenfall during the Examination process to update and revise the SoCG accordingly.

2. Site and Proposals

2.1. Site Description and Location

2.1.1. The site is accurately described and documented in the application submission and for the sake of clarity it can be confirmed that there are a number of international and national ecological designations forming part of the onshore development envelope. These are:

- Thanet Coast and Sandwich Bay Ramsar Site
- Thanet Bay and Sandwich Bay Special Protection Area (SPA)
- Sandwich Bay and Hacklinge Marshes Site of Scientific Interest (SSSI)
- National Nature Reserve (Stonelees and Pegwell Bay NNR)

2.1.2. In respect of the land within DDC's administrative boundary this comprises all land forming the (private) Baypoint Sports Club and associated Golf Academy with the DDC boundary line forming the northern boundary of the Sports Club and extending up to the western edge of Sandwich Road. The boundary line then crosses Sandwich Road and runs along the eastern side of the roundabout,

which is sited within Thanet District Council. South of the roundabout the District boundary crosses the A256 and includes a strip of land on the western side of the A256 with most of Richborough (Energy) Park within Thanet District area. The proposed sub-station site on Richborough Port and all associated works are within DDC's administrative boundary. It is worth noting that the Richborough Energy Park on the opposite side of the A256 currently provides the national grid energy connection to serve the nearby NEMO link. This connection will also serve the proposed windfarm array providing a link to the national grid network. The two sites are therefore in close proximity.

2.2. Details of the Proposal

- 2.2.1. To avoid repetition DDC agree and accept the project details and descriptions identified by Vattenfall in the submission and as confirmed and accepted in the agreed SoCG submitted in respect of Deadline 1. In particular the submitted Design and Access Statement (Document ref: 8.16) provides a comprehensive and concise description of the proposed works associated with the DCO application.
- 2.2.2. The proposed works directly within the DDC administrative area include all ground works from the southern boundary with Stonelees NNR and all the proposed sub-station works. DDC also have an interest in the impact on Stonelees NNR due to siting on the Management Steering Group. The visual impact on the seascape from Dover District is also considered.
- 2.2.3. The removal of Option 2 for landfall is welcome and fully removes the uncertainty and any previous representations from DDC in respect of any above ground works associated with above ground landfall options, the respective landscape and visual impacts on Pegwell Bay Country Park and any potential onshore landscape and visual impact concerns.

2.3. Relevant Development Plan Policies

- 2.3.1. DDC concur with the submitted assessments of the proposed development against the relevant adopted and saved local planning policies as set out in the ES.
- 2.3.2. For clarification the relevant Dover Development Plan considerations are:

- Saved Policies of the Local Plan 2002 (substation site was designated in the Kent Waste Plan 1998)
- Dover District Local Development Framework Core Strategy 2010
- Dover District Land Allocations Local Plan 2015
- Dover District Emerging Local Plan (up to 2037), this has very limited weight due to being at an early stage of drafting.

2.3.3. Baypoint Sports Club is allocated as protected open space in the DDC Core Strategy (2010).

2.3.4. DM15 and DM16 of the Core Strategy (2010) are of most relevance to this proposal and for clarity are set out below:

Policy DM15: Protection of the Countryside

Development which would result in the loss of, or adversely affect the character or appearance, of the countryside will only be permitted if it is:

- i. In accordance with allocations made in Development Plan Documents, or*
- ii. justified by the needs of agriculture; or*
- iii. justified by a need to sustain the rural economy or a rural community;*
- iv. it cannot be accommodated elsewhere; and*
- v. it does not result in the loss of ecological habitats.*

Provided that measures are incorporated to reduce, as far as practicable, any harmful effects on countryside character.

Policy DM16: Landscape Character

Development that would harm the character of the landscape, as identified through the process of landscape character assessment will only be permitted if:

- i. It is in accordance with allocations made in Development Plan Documents and incorporates any necessary avoidance and mitigation measures; or*
- ii. It can be sited to avoid or reduce the harm and/or incorporate design measures to mitigate the impacts to an acceptable level.*

2.3.5 The proposed development would fall under the broad scope of these local policies which both seek to mitigate any adverse impact of development to an acceptable level, with DM15 allowing development in the countryside that is justified by the need to be located in a rural location (ie. outside of urban confines). Therefore although not strictly in accordance with these policies, DDC would be of the view that such a development would be justified specifically by its location and would incorporate suitable mitigation measures that would overcome any impacts to an acceptable level. Consequently, the

proposed development could be considered in broad compliance with these policies.

2.4. Relevant Development Proposals and Relevant Planning History

- 2.4.1. DDC concur with the list of relevant development proposals identified by Vattenfall and the cumulative development proposals set out in ES Volume 1, Doc. Ref: 6.1.3.1. DDC do not consider these have any significant material effect on the assessment of the DCO application submission.
- 2.4.2. In terms of the planning history of the sections of the site within DDC, the substation site has a broad history of commercial uses; some port related uses, a waste transfer station and more recently open storage, particularly in relation to cars. It is currently used by HMRC for the open storage of cars and vehicles. The existing screen planting/landscaping was implemented in respect of previous uses. The current and previous uses are representative of a number of similar types of use in the immediate area.
- 2.4.3. In the 1998 Kent Waste Local Plan part of the proposed substation site and the relocated HMRC storage area were allocated for the purpose of proposed wharves or depots to receive and despatch aggregates, however the site currently has no allocation in the Kent Minerals and Waste Local Plan (2016).
- 2.4.4. In respect of the Baypoint Sports Club, there is relevant planning history in relation to extensions to the existing building but no other relevant planning history.

3. Likely Effects of the Proposed Development

- 3.1.1. DDC wish to identify their support for the environmental principles of renewable energy and sustainable sources of energy generation as a whole as identified in the Core Strategy (2010) and in line with National Guidance including the National Planning Policy Framework (NPPF) 2018.
- 3.1.2. DDC also recognise and fully support the creation of jobs and the wider benefits to the local economy, including additional spending and the benefits this will have on local businesses.

3.2. Onshore Landscape and Visual Impacts

3.2.1. In terms of the submitted onshore Landscape and Visual Impact Assessment (LVIA), associated photomontages and identified viewpoints, initial concerns raised by DDC in the S42 consultation response have largely been addressed in the submission of additional viewpoints, photomontages and a technical report (Doc. Refs: Volume 6 Annex 2-1 Rev A ref: 6.6.21.1 & Annex 2-2). These seek to clarify a number of concerns raised in respect of the visual impact of the proposed sub-station on views from the wider landscape and from publically accessible routes including public footpaths.

3.2.2. Although the proposed substation and associated works will result in a large structure, the surrounding context of the site including Richborough Energy Park and nearby commercial and industrial uses, adjacent to an A road, along with existing trees and structural planting will all mitigate and minimise the level of harm from the proposed structure. All additional viewpoints identified in DDC's S42 consultation response have been submitted with the DCO application and clarification has been provided where necessary. This additional clarification has sought to address DDC's concerns and has effectively addressed them. This is further assisted by the proposed screen planting that has been identified around the wider substation compound and a corresponding commitment to provide this landscaping along with enhanced habitat provision. All these factors address the concerns identified and DDC are satisfied that these measures, subject to the submission of reserved matters and details, will adequately mitigate and address any visual or landscape concerns that were previously identified. On the basis DDC does not wish to raise any further concerns in respect of this aspect of the proposal.

3.2.3. In respect of the proposed landscape and visual impacts associated with the proposed cable route, these have all been addressed with the removal of all above ground cable works including Option B identified in the DCO submission. DDC were previously concerned regarding the long term impact of any of the suggested proposals to provide the cable route above ground and particularly any proposal to extend the seawall or provide berms across Pegwell Country Park. DDC welcome the removal of all above ground options in the final submission which overcomes a number of local concerns and associated landscape and visual impacts concerns.

3.3. Offshore Landscape and Visual Impacts

3.3.1. DDC will seek, where possible to clarify previous comments submitted in the S42 response that were put forward by the Councils former Landscape Advisor

in respect of the offshore/seascape impacts of the proposed submission. These are clarified below.

3.3.2. For DDC, the proposed TEOWF presents two concerns:

- *The presence of the extra turbines, larger than the original, some occurring nearer the coast than TOWF: does the proposal change the character of that part of the sea when seen from land?*
- *The transition occurring at the periphery of the proposed extension: the more contained the extension is within the visual envelope of the TOWF, the less the visual effect.*

The relevant seascape character areas (Seascape Character Assessment for the Dover Strait, 2015) for land-based assessment from Dover district are C5A, I1A, I2A, and I3A. Areas C5A and I1A (Sandwich and Pegwell Bays) are described together in the assessment above and it is noted that the description states that these combined areas form ‘a distinctive bay seen from land and sea.’

It is acknowledged that the presence of TOWF in any baseline assessment means that any change in character of the seascape, as seen from shore, of TEOWF is related primarily to the effect of the nearer turbines, not those beyond the TOWF.

On review of the Offshore LVIA Commentary (Volume 6), it is considered that the overall change in wider seascape character in respect of the relationship with Dover District is constant and a minor component of a more significant change occurring for Thanet District. However, parts of Dover Strait seascape are affected:

- *The distinctiveness of Sandwich and Pegwell Bays as seen from land is compromised by the views of the northernmost turbines which create a partial enclosure of the north of the character area and,*
- *The southern peripheral turbines (three) have the effect of ‘spread’ when seen from land. Views from Dover district of the white water breaking on the sandbanks of the Goodwin Sands, as part of The Goodwin Sands, Gull Stream and North Sand Head SCA have previously been compromised by the presence of TOWF and extending the visual backdrop southwards is likely to further diminish the perception of this characteristic. The somewhat removed appearance of the southern peripheral turbines in this context appears constant and cause a visual effect that is considered significant.*

The visibility of TOWF is variable, both dependent on atmospheric conditions (mist, haze) as well as time of day and cloud cover. On a bright afternoon with

sunlight catching its masts and blades TOWF may be clearer than illustrated on the baseline imagery. Viewpoint 8, which utilises a photomontage of TOWF, is of great assistance in presenting a worst-case scenario.

Viewpoint 7 Deal Pier/Promenade: *TOWF could be visible and so TEOWF must also be considered so. The northernmost turbine and the southern three (detailed below) appear somewhat separate from the bulk of the wind farms.*

Viewpoint 8 (40°) Sandwich Bay Estate: *The use of photomontages of both the existing wind farm and the proposed extension is helpful. As such, they illustrate that the extension will have a significantly greater effect than the existing, particularly due to the turbines closer to the shore and those which do not benefit from the existing wind farm as a backdrop. Of particular note are the southern group of turbines (numbered 18, 19, and 20 on the wireline drawing) and the northernmost (numbers. 1, 14, 15 on the wireline drawing). The latter, particularly 14 and 15, do form a consistent extension to the main group of TOWF and TEOWF, but visually form a partial seascape enclosure with the Thanet coast which diminishes the perception of the sea beyond. It is considered that there should be a significant separation between views of the coast and the TEOWF. The relationship of the southern three turbines to the bulk of TEOWF is unclear, they appear separated.*

Viewpoint 18 The England Coast Path, Sandwich Flats: *The view is cluttered, inevitably, as the bulk of the TEOWF is beyond Ramsgate Harbour Arm, extending northwards 'behind' Thanet. The Nemo cable-laying barge may add to the clutter. The southern three turbines remain oddly separated from the rest.*

Summary: In respect of both seascape character and visual effects, there are proposed specific turbine locations (1, 14, 15, 18, 19, and 20 on wireline drawing for Viewpoint 8) that will have adverse effects and consideration should be given to mitigation of such effects.

3.3.3. Unfortunately DDC is in a position where it is not possible to expand on these comments in detail but will seek where possible to assist the Examining Authority in clarifying these concerns.

3.3.4. It can be confirmed that Viewpoint 8 above is Viewpoint 8 Fig 12.34 e Sandwich Bay in the SLVIA submitted formally in the DCO submission. This viewpoint continues to represent the most relevant view from Dover District.

3.3.5. It should be noted that a 20km threshold of significance has been identified for the proposed wind turbines. However the size of the proposed turbines could suggest that a 20km threshold of significance may not be large enough. Views of the existing Thanet array (which is of a much smaller scale, overall size and height) are visible from a much wider area including some views close to the town of Dover and from St Margaret's at Cliffe. The proposed wind turbines, due to their scale therefore potentially impact on views from a wider area and the importance of these seascape views should be fully acknowledged. Added to this is the nature of the surrounding coastline and land, including a flat expanse of the landform around the Sandwich Flats area and a significantly higher profile of land at the White Cliff's. These landscape features are significantly important characteristics in the local area, Kent and internationally and seascape views from Dover District are therefore an important consideration.

3.3.6. DDC would also suggest that the Optimum Space Layout (Fig. 12.1 in ES Volume 6 Annex 12-1 Rev A – Doc Ref 6.6.12.1) to site the array in closer proximity around the existing offshore array may minimise the visual spread across the seascape which could mitigate some of the visual impact over a wider area. Any reduction in the extent of the array in a southerly direction could mitigate or remove DDC's concern regarding the visual impact on the seascape from DDC's administrative area.

3.4. Onshore Ecology

3.4.1. Although some concerns were raised in DDC's S42 consultation response and the Relevant Representation, on further consideration of the submitted documents all previous concerns identified, including those relevant to Grey Seals within the wider area, have been adequately addressed in the formal submission. In relation to onshore ecology DDC can confirm that all impacts on onshore ecology have been satisfactorily addressed in the documents and it is noted that an Outline Landscape and Ecological Management Plan (Doc. Ref: 8.7) sets out mitigation measures for the protection, reinstatement and restoration of all onshore habitats during and post construction on all relevant land. It is further noted that it is proposed to provide habitat enhancement adjacent to the substation site which is welcomed and supported.

3.4.2. On this basis, DDC do not wish to comment further and would defer to Natural England and Kent Wildlife Trust to advise further in regards to all ecology matters. DDC would support in principle any additional measures as may be identified by Natural England and Kent Wildlife Trust in respect of

ecological matters, including reinstatement, restoration and habitat enhancement along with any relevant monitoring (short or long term) of these mitigation measures.

3.5. Tourism and Recreation

3.5.1. The inclusion of Document 6.3.4: Tourism and Recreation dealing specifically with this aspect is welcomed and includes sections specifically related to users of Stonelees NNR and Pegwell Bay Country Park which are likely to be significantly affected by the development during the construction phases. In addition users of the surrounding area using the coast line, Public Rights of Way and public footpaths could be affected by the proposed onshore works.

3.5.2. DDC consider that the potential impacts on tourism and recreation of the proposed development relate only to the onshore and landfall construction phases of the development. DDC consider the wind turbine array will have a neutral impact on tourism and recreation in the DDC administrative area. The sub-station works and building, following landscape mitigation measures will also be likely to have a long-term neutral impact.

3.5.3. The location of the cable route through the Country Park and NNR is accepted as a necessary requirement if the development is found to be acceptable in all other regards. The mitigation measures to minimise the construction aspects of the proposal have addressed as far as practicable the short term impacts on the use of these recreational areas and seek to contain the construction impacts to defined areas. DDC agree with the mitigation measures identified in the submission and consider that suitable measures have been incorporated into the mitigation proposals, although the minimisation of the timescale of the construction phases of development and working outside of peak holiday season could minimise the impact on tourism and recreation further.

3.6. Local Transport Patterns, Traffic and Access

3.6.1. DDC can confirm that all highways and local transport considerations shall be addressed by Kent Highways and Transportation within the Kent County Council (KCC) representations and LIR. In respect of all highway matters (including access points and construction traffic) DDC would seek the views of Kent Highways and Transportation and therefore raise no comments on these matters but would support their detailed comments.

3.6.2. The relevant authority required to discharge the DCO requirements in relation to the provision of new means of access to the public highway may need to be qualified. Normally the local planning authority would be the determining authority, in consultation with the Highways Authority. This is a separate process from any highway consents required under the Highway Acts and associated legislation.

3.7. Historic Environment Considerations

3.7.1. In respect of heritage assets within DDC, a robust methodology has identified the relevant designated heritage assets on which the proposal would have an impact. The assessment of the level of impact has identified minor effects in all cases with no mitigation required and DDC are in agreement with these conclusions.

3.7.2. In respect of archaeology KCC Archaeology and Historic England are the relevant parties to respond on these matters and DDC would support their views on these aspects.

3.8. Ground Conditions, Flood Risk and Land-Use

3.8.1. In terms of overall ground conditions, flood risk and land-use DDC have no outstanding concerns in relation to these matters. DDC are in agreement with the approach to assessment, data gathering and the methodology identified. DDC are satisfied to refer to the Environment Agency and Thanet District Council in respect of any additional requirements and would agree with any further recommendations.

3.8.2. In terms of potential ground contamination and the impact on controlled waters associated with the landfill under Pegwell Bay Country Park, at this stage and without the survey investigation results it is not possible to comment further in respect of this aspect at this stage. Nevertheless, these works would fall within Thanet District Council and would also be appropriately addressed by the Environment Agency. For these reasons DDC would refer to the Environment Agency and Thanet District Council to adequately address these matters and would be in full agreement with any recommendations as may be identified. Nevertheless, DDC may wish to address this aspect at a later stage depending of the outcomes of the survey investigation to be undertaken.

3.8.3. In respect of land-use it is expected that all previous land uses will be fully reinstated following the completion of the cable route and restoration plans. In

respect of the substation site, this is largely hardsurfaced and has been used for previous commercial uses and open storage for a significant period of time. Therefore it is considered that the proposed land use will not radically change.

3.9. Air Quality, Noise and Vibration

3.9.1. In terms of air quality DDC have no concerns in relation to these matters subject to compliance with the Code of Construction Practice (CoCP)(Doc ref: 8.1). DDC are in agreement with the approach to assessment and data gathering and accept the methodology identified.

3.9.2. In respect of noise and vibration, DDC do not have any concerns in relation to these matters within the DDC area and are in agreement with the approach, data gathering and methodology identified. Mitigation measures identified in the CoCP would need to be fully complied with throughout the construction stages, with extended hours of work kept to a minimum and only during exceptional circumstances. DDC does not wish to raise any further points in relation to these aspects of the proposal at this stage, but would support any further mitigation measures that may be considered appropriate by Thanet District Council or other relevant parties.

4. Proposed articles and requirements within the draft Order (DCO)

4.1.1. The DCO contains in most part appropriate provisions for the control and management of the proposed development. DDC is largely in agreement with the wording of the proposed conditions in the Draft DCO but would welcome further discussion on any specific matters of concern from the Examining Authority or other relevant parties. The following points should be noted:

- Schedule 1, Part 1 - will need updating to account for the removal of Option 2 at landfall.
- Schedule 1, Part 3 – The siting of the construction compounds and means of access could be submitted for consideration as part of the requirements of the DCO to ensure the impact of these works is minimise as far as possible.
- Schedule 1, Part 4 – Incorrect reference is made to the relevant planning authority area in this schedule.

- Schedule 10: Procedure for Discharge of Requirements. This has a number of unrealistic timescales for the validation and consultation of relevant parties resulting in a significant onus of LPA's to process matters immediately.

4.1.2. Further information, Paragraph 3 sets out a requirement for the LPA to issue a consultation and notify the undertaker of any further information required within 1 business day. This is unrealistic at the standard response time would be between 3-5 working days. In addition a consultation request for further information to be submitted to the applicant within 21 days, again this timescale is unrealistic, there would normally be at least 21 days for a consultee to respond to a request for comments and then the LPA will need to deal with this request accordingly. Consequently 21 days would be an insufficient period to deal with this process.

4.1.3. Equally in respect of Appeals, 3, (2), (d) – a requirement to submit written representations to an appointed person within 10 business days of the date on which the appeal parties are notified is a very limited period to coordinate a response. The standard appeal process would normally be six weeks.

4.1.4. Although there is clearly a need to prioritise such submissions accordingly, the proposed timescales set out in this section of the draft DCO would be unrealistic to achieve.

4.1.5. In addition, it would be of assistance to DDC for further clarification from the applicants of those matters that are expected to be discharged by DDC, TDC or other relevant authority or where joint applications or discharges are required. The documentation submitted with the application is not clear on this point, perhaps a table to identify DDC (and other statutory authority) requirements post decision would be of assistance.

4.1.6. In respect of the Certification of Plans, the submitted plans appear to be fit for purpose.

4.2. DCO Obligations

4.2.1. There do not appear to be any legal obligations submitted in relation to the proposed development the subject of this DCO. There are however a number of draft strategies that have been put forward to form part of the DCO. DDC consider these can be adequately addressed in the provisions and schedules of

the DCO. Notwithstanding the above, restoration and monitoring of the site, in particular the ground works associated with landfall and the cable routes and screen planting, will need to be ongoing to ensure the ecological value of Stonelees NNR and Pegwell Bay Country Park can be fully reinstated and the substation site is adequately screened from relevant viewpoints. The timescales identified by the application refer to up to 2 years following completion; however the relevant land and habitats may take longer to be fully restored. What provisions are identified to address the need for ongoing monitoring and who would be responsible for this? Could this be addressed in a legal obligation to provide additional monies for this specific purpose or can this be addressed within the provisions of the DCO.

5. Conclusions

5.1.1. DDC will continue to engage positively with Vattenfall and the Examining Authority and welcome the opportunity for further engagement on the content of this Local Impact Report as the examination advances.