

Vattenfall Wind Power Ltd

Thanet Extension Offshore Wind Farm

Appendix 24 to Deadline 1 Submission: Statement of Common Ground – Port of Tilbury and London Gateway

Relevant Examination Deadline: 1

Submitted by Vattenfall Wind Power Ltd

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1 Introduction

1.1 Overview

- 1 This Statement of Common Ground (SoCG) relates to the proposed development of the Thanet Extension Offshore Wind Farm (Thanet Extension). It has been prepared with respect to the application made by Vattenfall Wind Power Ltd (VWPL) (the Applicant) for a development consent order (DCO) to the Planning Inspectorate (PINS) under the Planning Act 2008 (the Application).
- 2 This SoCG with the Port of Tilbury and London Gateway is a means of clearly stating any areas of agreement and disagreement between the two parties in relation to the Application. The SoCG has been structured to reflect the request made by the Examining Authority and following discussion with the relevant parties on Monday 17th December. Hereafter Port of Tilbury and London Gateway are jointly referred to as the 'Interested Parties' (IPs).
- 3 It is the intention that this document will help facilitate post application discussions between both parties and also give the Examining Authority (ExA) an early sight of the level of common ground between both parties from the outset of the examination process.

1.2 Approach to SoCG

- 4 This SoCG has been developed during the examination phase of the Thanet Extension. In accordance with discussions between the Applicant and the IPs, the SoCG is focused on those issues raised by the IPs within their representations. It has also been cognisant of the request made by the Examining Authority within the 'Rule 8' letter published on the 18th December 2018.
- 5 The structure of the SoCG is as follows:
 - Section 1: Introduction;
 - Section 2: Consultee's Remit;
 - Section 3: Consultation;
 - Section 4: Agreements Log; and
 - Section 5: Matters under discussion.

1.3 The Development

- 6 The Application is for development consent for VWPL to construct and operate the Thanet Extension Offshore Wind Farm (Thanet Extension) under the Planning Act 2008.
- 7 Thanet Extension will comprise of wind turbine generators (WTGs) and all the infrastructure required to transmit the power generated to the national grid. A maximum of 34 WTGs will be installed with a power output of 340 MW. The project will install up to four offshore export cables and may require the installation of one Offshore Substation (OSS) and up to one Meteorological Mast.
- 8 The key offshore components of Thanet Extension are likely to include:
- Offshore WTGs;
 - OSS (if required);
 - Meteorological Mast (if required);
 - Foundations;
 - Subsea inter-array cables linking individual WTGs;
 - Subsea export cables from the OWF to shore; and
 - Scour protection around foundations and on inter-array and export cables (if required).
- 9 The array area will have a maximum size of 70 Km² and surrounds the existing Thanet Offshore Wind Farm (TOWF). It is located approximately 8 km Northeast of the Isle of Thanet, situated in the County of Kent. Each WTG will have a maximum blade tip height of 250 m above Mean High Water Springs (MHWS), a maximum diameter of 220 m and a minimum 22 m clearance between the MHWS and the lowest point of the rotor.
- 10 Electricity generated will be carried via a maximum of four high voltage subsea cables to the landfall site, situated at Pegwell Bay. Offshore cables will be connected to the onshore cables and ultimately the national grid network at Richborough Energy Park. The onshore cable corridor is 2.6 km in length at its fullest extent.

- 11 More details on the proposed development are described in the Environmental Statement (ES) Volume 2, Chapter 1: Project Description (Offshore) (Application Ref 6.2.1) and Volume 3, Chapter 1: Project Description (Onshore) (Application Ref 6.3.1) of the Environmental Statement.

2 Consultee's Remit

Note: The consultee will provide remit at a later deadline.

3 Consultation

3.1 Application elements under the Consultees’s remit

- 12 Work Nos. 1 - 3A, detailed in Part 1 of Schedule 1 of the draft DCO describe the elements of Thanet Extension which may affect the interests of the IPs.
- 13 The IPs have interests with the Thames Estuary region and interaction between the proposed development and vessels approaching this region is therefore of interest to the IPs.
- 14 The technical components of the DCO application of relevance to the Consultee (and therefore considered within this SoCG) comprise:
- Volume 2, Chapter 1: Project Description (Offshore) (Application Ref 6.2.1);
 - Volume 2, Chapter 10: Shipping and Navigation (Application Ref 6.2.10); and
 - Volume 4, Annex 10-1: Navigational Risk Assessment (Application Ref 6.4.10.1); and
 - Application document 3.1: draft Development Consent Order (Application Ref 3.1)

3.2 Consultation Summary

- 15 This section briefly summarises the consultation that VWPL has undertaken with the IPs.

Table 1: Consultation undertaken with the IPs

Date & Type:	Detail:
Nov 2017 – January 2018; S42 consultation	Consultation undertaken with statutory and relevant non-statutory parties on Preliminary Environmental Information.
17 th December 2018/ post hearing teleconference	Discussion held to confirm the content and nature of the SoCG
Schedule for January 2019	SoCG

4 Agreements Log

- 16 The following section of this SoCG identifies the level of agreement between the parties for each relevant component of the application material (as identified in Section 3.1). In order to easily identify whether a matter is “agreed”, “under discussion” or indeed “not agreed” a colour coding system of green, yellow and orange is used in the “final position” column to represent the respective status of discussions.

4.2 Shipping and Navigation

- 17 The Project has the potential to impact upon Shipping and Navigation receptors, inclusive of commercial shipping interests, and these interactions are duly considered within Volume 2, Chapter 10: Shipping and Navigation (Application Ref 6.2.10) of the ES. In addition, the NRA is presented within Volume 4, Annex 10-1: Navigational Risk Assessment (Application Ref 6.4.10.1). Table 2 identifies the status of discussions relating to this topic.

Table 2: Status of discussions relating to Shipping and Navigation.

Discussion Point	Thanet Extension Position	Consultee Position	Final Position
Study area	It is agreed that the study area used to inform the assessment of the project on shipping and navigation receptors was appropriate.		
Red Line Boundary revision	It is agreed that the revision made to the red line boundary following Section 42 consultation reduces interaction in the primary area of concern.		
Approach to NRA	It is agreed that the Navigational Risk Assessment has been undertaken in line with the requirements set out in the Marine Guidance Note (MGN) 543 – Guidance on UK Navigation Practice, Safety and Emergency Response Issues.	<i>For transparency it should be noted that the MCA have agreed this position with the Thanet Extension project as recorded within their relevant representation. The position of the IPs may agree or disagree with that position.</i>	
Environmental Statement Baseline and Methodology	It is agreed that the shipping and navigation baseline environment insofar as it relates to commercial shipping has been adequately and appropriately described in the ES. Based on that information it is further agreed that the marine traffic survey data and wider data sources used are appropriate for the assessment and details a good representation of commercial traffic in the area of the project		

Discussion Point	Thanet Extension Position	Consultee Position	Final Position
Environmental Statement Baseline and Methodology	It is agreed that the baseline appropriately described and defines the nature of routes (i.e. internationally recognised shipping lanes but locally important routes (in accordance with the NPS) and use of those by lanes and routes by vessels bound for PoT/ LG.		
Environmental Statement Baseline and Methodology	It is agreed that the approach adopted in the Environmental Statement is appropriate to assess the magnitude and range of potential impacts on commercial shipping interests.		
Tolerability definition and assessment	In the absence of industry specific guidance it is agreed that the tolerability of risk is appropriately defined and assessed through application of the HSE standards.	<i>For transparency it should be noted that the MCA have agreed this position with the Thanet Extension project. The position of IPs may agree or disagree with that position.</i>	
Environmental Statement assessment	It is agreed that the Applicant has adequately assessed navigational safety impacts on commercial vessels from the Project.		
Environmental Statement assessment/mitigation	It is agreed that the mitigation and control measures included within the application documents are appropriate for the purposes of maintaining safety within the region and minimising impacts on commercial shipping interests.		

5 Matters under discussion

18 This summary section identifies those matters raised by the IPs during the pre-application consultation that have yet to be resolved and are subject to ongoing discussion as of the last consultation meeting held with the IPs.

- Influence of the proposed project on vessel transit times and therefore potential impacts on ports and harbours; and
- Adequacy of Navigational Risk Assessment