

Vattenfall Wind Power Ltd

Thanet Extension Offshore Wind Farm

Appendix 23 to Deadline 1 Submission: Statement of Common Ground – Chamber of Shipping

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 Chamber of Shipping 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 topics of interest to the UK Chamber of Shipping on the Application.
- 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 pre-examination phase of the Thanet Extension. In accordance with discussions between the Applicant and the Chamber of Shipping, the SoCG is focused on those issues raised by the Chamber of Shipping within its response to Section 42 consultation that has underpinned the pre-application consultation between the parties. It has also been cognisant of the request made by the Examining Authority within the 'Rule 6' letter published on the 9th November 2018 and the Rule 8 letter which followed the second Issue Specific Hearing on the 12th 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 would have a maximum size of 70 Km² and could surround 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 Chamber of Shipping's Remit

- 12 The UK Chamber of Shipping is the trade association and voice of the UK shipping industry with more than 180 members from across the maritime sector covering some 20m gross tonnage and 100 vessels trading around the UK and across the world.

3 Consultation

3.1 Application elements under the Chamber of Shipping’s remit

- 13 Work Nos. 1 - 3A, detailed in Part 1 of Schedule 1 of the draft DCO (Appendix 35 of Deadline 1 Submission) describe the elements of Thanet Extension which may affect the interests of the Chamber of Shipping.
- 14 The Chamber of Shipping seek to deliver for their members trusted specialist expertise, lobbying and influence at a UK level on maritime issues across national, European and international government and governmental bodies.
- 15 The technical components of the DCO application of relevance to the Chamber of Shipping (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

- 16 This section briefly summarises the consultation that VWPL has undertaken with the Chamber of Shipping. Engagement during the pre-application phase, both statutory and non-statutory, is summarised in Table 1.

Table 1: Consultation undertaken with the Chamber of Shipping pre-application

Date & Type:	Detail:
December 2017	Engagement with Marico on initial concerns and information presented within the Preliminary Environmental Information Report
January 2018, S42 Consultation	Comments relating to the Preliminary Environmental Information Report

3.3 Post-application Consultation

17 VWPL has engaged with the Chamber of Shipping since the Thanet Extension development was accepted for examination by the Planning Inspectorate on 23rd July 2018. A summary of the post-application consultation with the Chamber of Shipping is detailed in Table 2.

Table 2: Consultation undertaken with the Chamber of Shipping post-application

Date/ Type:	Detail:
Liaison through the examination process	Receipt of the relevant representations.

4 Agreements Log

- 18 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.

Shipping and Navigation

- 19 The Project has the potential to impact upon Shipping and Navigation 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 3 identifies the status of discussions relating to this topic.

Table 3: Status of discussions relating to Shipping and Navigation.

Discussion Point	Thanet Extension Position	Chamber of Shipping 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.	The chamber agrees that the study area used to inform the assessment of the project 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.		
Consultation	It is agreed that throughout the pre-application process the level of consultation and the provision of information has been sufficient in informing consultees of the development of the project and the predicted impacts on shipping and navigation.	The chamber has been consulted by the applicant on a number of occasions.	
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. The position of Chamber of Shipping may agree or disagree with that position.</i>	

Discussion Point	Thanet Extension Position	Chamber of Shipping Position	Final Position
		The chamber accepts the view of the MCA that the NRA has been undertaken in line with the requirements of MGN 543	
Approach to NRA	It is agreed that the Hazard Log adequately identifies the relevant risks.	The chamber agrees that the Hazard Log adequately identifies the relevant risks.	
Approach to NRA	It is agreed that the Hazard Log adequately quantifies and scores the relevant risks.	The chamber disagrees that the Hazard Log adequately quantifies and scores the relevant risks.	
Approach to NRA	It is agreed that the scores presented within the Hazard Log are accurate	The chamber disagrees that the scores presented within the Hazard Log are accurate	

Discussion Point	Thanet Extension Position	Chamber of Shipping Position	Final Position
Environmental Statement Baseline and Methodology	It is agreed that the shipping and navigation baseline environment 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	The chamber agrees that the baseline environment has been adequately and appropriately described in the ES but disagrees that the information provided is an accurate representation of the commercial traffic within the area of the project and the safe and prudent use of sea room in the vicinity of the propose extension.	
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 navigational safety impacts from the proposed Project on passage of commercial vessels	The chamber disagrees that the ES assess the magnitude and range of navigational safety impacts from the proposed Project on passage of commercial vessels	
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 as presented within their relevant representation. The position of Chamber of Shipping may agree or disagree with that position.</i>	

Discussion Point	Thanet Extension Position	Chamber of Shipping Position	Final Position
		<p>The chamber accepts the view of the MCA that the tolerability of risk is appropriately defined and assessed through application of the HSE standards.</p>	
<p>Environmental Statement/ assessment</p>	<p>It is agreed that the ES adequately assesses impacts on shipping routes and gives appropriate weighting on routes that whilst locally important are not international shipping lanes.</p>	<p>The chamber disagrees that the ES adequately assesses impacts on shipping routes and gives appropriate weighting on routes that whilst locally important are not international shipping lanes.</p>	

5 Matters under discussion

- 20 This summary section identifies those matters raised by the Chamber of Shipping during consultation and through the examination process that have yet to be resolved and are subject to ongoing discussion as of the last consultation meeting held with the consultee.
- Based on the information provided within the Environmental Statement and NRA, the predicted impacts on commercial shipping are tolerable.