

Vattenfall Wind Power Ltd

Thanet Extension Offshore Wind Farm

Appendix 22 to Deadline 1 Submission: Statement of Common Ground – Trinity House Lighthouse Service (THLS)

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 Trinity House Lighthouse Service (THLS) 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 THLS 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 (Ex. A) 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 THLS, the SoCG is focused on those issues raised by the THLS within its response to Section 42 consultation that has underpinned the pre-application consultation between the parties.
- 5 The structure of the SoCG is as follows:
 - Section 1: Introduction;
 - Section 2: THLS Remit;
 - Section3: 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:
 - Up to 34 Offshore WTGs;
 - OSS (if required);
 - Meteorological Mast (if required);
 - WTG 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 Highest Astronomical Tide (HAT), a maximum diameter of 220 m and a minimum 22 m clearance between the Mean High Water Springs (MHWS) and the lowest point of the blade.
- 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) of the Environmental Statement.

2 THLS Remit

- 12 Trinity House is the General Lighthouse Authority for England, Wales, the Channel Islands and Gibraltar with powers principally derived from the Merchant Shipping Act 1995 (as amended). The statutory role of Trinity House as a General Lighthouse Authority includes the superintendence and management of lighthouses, buoys and beacons within our area of jurisdiction.

3 Consultation

3.1 Application elements under the THLS’s remit

- 13 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 THLS.
- 14 The technical components of the DCO application of relevance to the THLS (and therefore considered within this SoCG) comprise:
- The draft DCO
 - Volume 2, Chapter 10: Shipping and Navigation (Application Ref 6.2.10).

3.2 Consultation Summary

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

Table 1: Consultation undertaken with the THLS pre-application

Date & Type:	Detail:
January 2016 Meeting	Pre-scoping meeting
December 2015 – January 2016 Email correspondence	Pre-scoping
January 2017 Meeting	Scoping response meeting
January 2018 Meeting	NRA Meeting
January 2018, S42 Consultation	Comments relating to the Preliminary Environmental Information Report
February 2018 Meeting	Post-S42 Meeting
March – April 2018 Correspondence	Review of the NRA

3.3 Post-application Consultation

- 16 VWPL has engaged with the THLS 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 THLS is detailed in Table 2.

Table 2: Consultation undertaken with the THLS post-application

Date/ Type:	Detail:
23 rd August 2018 – MCA & THLS Meeting	Meeting to discuss initial thoughts on the Application, process for agreeing SoCG.
4th October 2018 – MCA & THLS Meeting	Meeting to discuss the relevant representation, SoCG, and next steps for issue resolution on the outputs of the NRA.

4 Agreements Log

- 17 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 Project Description (Offshore)

- 18 The offshore project description outlines the parameters and methods for the construction, operational and maintenance and decommissioning phases with regard to the offshore elements. Table 3 identifies the status of discussions relating to this topic area between the parties.

Table 3: Status of discussions relating to Project Description (Offshore).

Discussion Point	Thanet Extension Position	THLS Position	Final Position
Project Description	The project description, and transposition into the relevant chapter and NRA annex, appropriately describes the project for the purposes of EIA	<i>THLS 041018 – Agreed</i>	Agreed

4.3 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 4 identifies the status of discussions relating to this topic area between the parties and is informed through meetings held post-application as noted in Table 2.

Table 4: Status of discussions relating to Shipping and Navigation.

Discussion Point	Thanet Extension Position	THLS 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.	THLS 041018 – Agreed	Agreed
Consultation	It is agreed that throughout the pre-application process the level of consultation and the provision of information has been sufficient in informing THLS of the development of the project and the predicted impacts on shipping and navigation.	THLS 041018 – Agreed	Agreed
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 and complies in full with the MGN 543 checklist.	THLS 041018 - Although we don't disagree with this statement, <i>there is one section missing from the required checklists in addition to the MGN 543 checklist which Andrew Rawson agreed to provide when we held the separate MGN 543 checklist feedback meeting.</i>	Agreed

Discussion Point	Thanet Extension Position	THLS 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	THLS 041018 - Although we don't disagree with this statement, we do note that there were limitations raised with the pilotage study during the consultation period, and how 'realistic' the trials were.	Agreed
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 the users of commercial vessels	THLS 041018 – Agreed	Agreed
Environmental Statement Baseline and Methodology	It is agreed that the design parameters of the project would result in the worst case collision and allision scenario for commercial vessels.	THLS 041018 – Agreed	Agreed
Tolerability definition and assessment	It is agreed that the tolerability of risk is appropriately defined and assessed.	THLS 041018 – THLS recognise that MCA do not write its own guidance on tolerability however the statement drafted with MCA and TH is agreed.	Agreed

Discussion Point	Thanet Extension Position	THLS Position	Final Position
Environmental Statement assessment	It is agreed that the Applicant has adequately assessed navigational safety impacts on users of commercial vessels from the Project.	<i>THLS 041018 – Agreed</i>	Agreed
dML(s)	It is agreed that Condition 12(1)(a) and 10(1)(b)(Pre-construction plans and documentation) of the Generation Assets and Transmission Assets dML (Schedule 11 and 12 of the DCO respectively) provides adequate mitigation by ensuring the proposed final layout will be submitted for approval to the MMO; who will then in turn consult with the MCA and THLS on any issues with navigational safety, prior to giving approval. This agreement includes all surface structures (structures visible above Lowest Astronomical Tide) noted within the DCO including the wind turbine generators, and offshore substation. It is agreed that the plan which is required to be agreed with the MMO in consultation with the THLS under Condition 12(1)(a)(i) of the DML will include details of turbine identification marking in accordance with MGN 543.		

Discussion Point	Thanet Extension Position	THLS Position	Final Position
Adequacy of provision for lighting	It is agreed that the DCO/dML provides adequate provision for Trinity House to approve the lighting and marking of the OWF in line with their noted remit through Condition 7 (Aids to Navigation) of the dML		

5 Matters under discussion

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

- Measures presented in the ES are sufficient to minimise navigational safety impacts to users
- Mitigation measures implemented are sufficient to bring risk to tolerable levels.
- Based on the information provided within the Environmental Statement and NRA, the predicted impacts are tolerable.