

# **Vattenfall Wind Power Ltd**

## **Thanet Extension Offshore Wind Farm**

### Appendix 21 to Deadline 1 Submission: Statement of Common Ground – Thanet District Council (TDC)

Relevant Examination Deadline: 1

Submitted by Vattenfall Wind Power Ltd

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Revision A

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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 Thanet District Council (TDC) 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 TDC 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 TDC, the SoCG is focused on those issues raised by TDC within its response to Scoping, Section 42 consultation and as raised through the Evidence Plan process that has underpinned the pre-application consultation between the parties.
- 5 The structure of the SoCG is as follows:
  - Section 1: Introduction;
  - Section 2: Consultation;
  - Section 3: Agreements Log; and
  - Section 4: Matters under discussion.

## 1.3 The Development

- 6 The Application if 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 Km<sup>2</sup> 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) (Document Ref: 6.2.1) and Volume 3, Chapter 1: Project Description (Onshore) (Document Ref: 6.3.1) of the Environmental Statement.

## 2 Consultation

### 2.1 Application elements under Thanet District Councils remit

- 12 Work Nos. 1 - 16, detailed in Part 1 of Schedule 1 of the draft DCO describe the elements of Thanet Extension which may affect the interests of TDC.
- 13 Thanet District Council is the local government body for the Thanet District within the county of Kent.
- 14 The technical components of the DCO application of relevance to TDC (and therefore considered within this SoCG) comprise:
- Volume 1, Chapter 4: Site Selection and Alternatives (Document Ref: 6.1.4);
  - Volume 2, Chapter 10: Shipping and Navigation (Document Ref: 6.2.10);
  - Volume 3, Chapter 1: Project Description (Onshore) (Document Ref: 6.3.1);
  - Volume 3, Chapter 2: Onshore Landscape and Visual Impact Assessment (Document Ref: 6.3.2);
  - Volume 3, Chapter 3: Socio-economics (Document Ref: 6.3.3);
  - Volume 3, Chapter 4: Tourism and Recreation (Document Ref: 6.3.4);
  - Volume 3, Chapter 5: Onshore Biodiversity (Document Ref: 6.3.5);
  - Volume 3, Chapter 6: Ground Conditions, Flood Risk, Land Use (Document Ref: 6.3.6);
  - Volume 3, Chapter 7: Historic Environment (Document Ref: 6.3.7);
  - Volume 3, Chapter 8: Traffic and Access (Document Ref: 6.3.8);
  - Volume 3, Chapter 9: Air Quality (Document Ref: 6.3.9); and
  - Volume 3, Chapter 10: Noise and Vibration (Document Ref: 6.3.10).

## 2.2 Consultation Summary

15 This section briefly summarises the consultation that VWPL has undertaken with TDC. Engagement during the pre-application phase, both statutory and non-statutory, is summarised in Table 1 below, this includes any meetings and correspondence held as part of the Evidence Plan process and Section 42 consultation.

**Table 1: Consultation undertaken with the TDC pre-application**

Date & Type:	Detail:
2017 Ecological Review Panel	Onshore Archaeology Panel
2017 Ecological Review Panel	Ground Conditions, Hydrology & Flood Risk and Land Use
2017 Ecological Review Panel	Human Environment Panel
2017 Ecological Review Panel	Landscape and Visual Panel
January 2018, S42 Consultation	Comments relating to the Preliminary Environmental Information Report

## 2.3 Post-application Consultation

16 VWPL has engaged with TDC since the Thanet Extension development was accepted for examination by the Planning Inspectorate on 27<sup>th</sup> July 2018. A summary of the post-application consultation with TDC is detailed in Table 2.



**Table 2: Consultation undertaken with TDC post-application**

Date/ Type:	Detail:
24 <sup>th</sup> August 2018	Meeting to discuss TDC's relevant representation and the form of the Statement of Common Ground

### **3 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 2.1). 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.

### **3.2 Site Selection Alternatives**

- 18 The Project has analysed and evaluated a range of options regarding location of infrastructure. The reasons for the selection of the proposed site are duly considered within Volume 1, Chapter 4: Site Selection and Alternatives (Application Ref 6.1.4). Table 3 identifies the status of discussions relating to this topic area between the parties.

**Table 3: Status of discussions relating to Site Selection and Alternatives.**

Discussion Point	Thanet Extension Position (It is agreed that)	TDC Position	Final Position
Landfall locations	The application provides adequate justification for the choice of landfall and adequately considers all reasonable alternatives.	Agreed	
Onward cable route	The application provides adequate justification for the choice of onward cable route and adequately considers all reasonable alternatives.	Agreed	

### **3.3 Shipping and Navigation**

- 19 The Project has the potential to impact upon shipping and navigation. These interactions are duly considered within Volume 2, Chapter 10 of the Thanet Extension ES (Application Ref 6.2.10). Noting that the project has undertaken extensive consultation with the relevant maritime safety and marine fisheries interests Table 4 identifies the status of discussions relating to shipping and navigation insofar as TDC have requested information during formal consultation.

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

Discussion Point	Thanet Extension Position (it is agreed that)	TDC Position	Final Position
Export cable route	The assessment adequately addresses concerns raised about the Harbour limits	Agreed	
NE Spit pilotage	Impacts of pilotage have been thoroughly and appropriately assessed as part of the NRA.	Agreed	
Cable route impacts	The evidence within the ES demonstrates that consultation has taken place with the relevant commercial fishing, shipping and navigation, and recreational interests.	Agreed	

### **3.4 Seascape and Landscape Visual Impact Assessment(s)**

- 20 The Project has the potential to impact upon the landscape and seascape. These interactions are duly considered within Volume 3, Chapter 2 and Volume 2, Chapter 12 of the Thanet Extension ES (Application refs 6.3.2 and 6.2.12 respectively). Table 5 identifies the status of discussions relating to this topic area between the parties.

**Table 5: Status of discussions relating to Seascape and Landscape and Visual Impact Assessment.**

Discussion Point	Thanet Extension Position (It is agreed that)	TDC Position	Final Position
Adequacy of characterisation data	The receiving environment has been adequately characterised and appropriately described.	Agreed	
Adequacy of assessment methodology	The methods of assessment for seascape and Landscape VIA are appropriate	Agreed	
Outcomes of assessment/conclusions	The outcomes of the assessment are appropriate and accurately describe the likely impacts.	Agreed	
Adequacy of management and/or mitigation measures where appropriate	The proposed management and mitigation as identified within the ES chapter are appropriate	Agreed	



### **3.5 Tourism and Recreation**

- 21 The Project has the potential to impact upon tourism and recreation. These interactions are duly considered within Volume 3, Chapter 4 of the Thanet Extension ES (Application Ref 6.3.4). Table 6 identifies the status of discussions relating to this topic area between the parties.

**Table 6: Status of discussions relating to Tourism and Recreation.**

Discussion Point	Thanet Extension Position (it is agreed that)	TDC Position	Final Position
Adequacy of characterisation data	The receiving environment has been adequately characterised and appropriately described.	Agreed	
Adequacy of assessment methodology	The methods of assessment for considering potential effects on tourism and recreation receptors are appropriate.	Agreed	
Outcomes of assessment/conclusions	The outcomes of the assessment are appropriate and accurately describe the likely impacts.	Agreed	
Adequacy of management and/or mitigation measures where appropriate	The proposed management and mitigation as identified within the tourism and recreation ES chapter are appropriate	Agreed	

### **3.6 Ground Conditions, Flood Risk and Land Use**

- 22 The Project has the potential to impact upon ground conditions. These interactions are duly considered within Volume 3, Chapter 6 of the Thanet Extension ES (Application Ref 6.3.6). Table 7 identifies the status of discussions relating to this topic area between the parties.

**Table 7: Status of discussions relating to Ground Conditions, Flood Risk and Land Use.**

Discussion Point	Thanet Extension Position	TDC Position	Final Position
Policy and plans	The relevant plans, policy and legislation have been referred to when considering potential effects on ground conditions, flood risk and land use	Agreed	
Adequacy of characterisation data	The receiving environment has been adequately characterised and appropriately described.	Under discussion	
Outcomes of assessment/conclusions	The outcomes of the assessment are appropriate and accurately describe the likely impacts.	Under discussion	
Adequacy of management and/or mitigation measures where appropriate	The proposed management and mitigation as identified within the ES chapter are appropriate	Under discussion	

### **3.7 Onshore Historic Environment**

- 23 The Project has the potential to impact upon the historic environment. These interactions are duly considered within Volume 3, Chapter 7 of the Thanet Extension ES (Application ref 6.3.7). Table 8 identifies the status of discussions relating to this topic area between the parties. It is noted that in general terms, and as captured within the Council's relevant representation TDC will defer to other agencies with regards archaeology. The following section therefore refers primarily to historic environment as applicable to TDCs interests rather than archaeology.

**Table 8: Status of discussions relating to Onshore Historic Environment.**

Discussion Point	Thanet Extension Position (it is agreed that)	TDC Position	Final Position
Policy and plans	The relevant plans, policy and legislation have been referred to when considering potential effects on historic environment.	Agreed	
Adequacy of characterisation data	The receiving environment has been adequately characterised and appropriately described.	Agreed	
Adequacy of assessment methodology	The assessment methodology for consideration of indirect and direct effects on historic environment are considered appropriate.	Agreed	
Outcomes of assessment/conclusions	The outcomes of the assessment are appropriate and accurately describe the likely impacts.	Agreed	

<p>Adequacy of management and/or mitigation measures where appropriate</p>	<p>The proposed management and mitigation as identified within the ES chapter are appropriate</p>	<p>Agreed</p>	
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## 3.8 Air Quality

- 24 The Project has the potential to impact upon air quality. These interactions are duly considered within Volume 3, Chapter 9 of the Thanet Extension ES (Application Ref 6.3.9). Table 9 identifies the status of discussions relating to this topic area between the parties.



**Table 9: Status of discussions relating to Air Quality.**

Discussion Point	Thanet Extension Position (it is agreed that)	TDC Position	Final Position
Policy and plans	The relevant plans, policy and legislation have been referred to when considering potential effects on air quality	Agreed	
Adequacy of characterisation data	The receiving environment has been adequately characterised and appropriately described.	Agreed	
Adequacy of assessment methodology	The assessment methodology for consideration of effects on air quality is considered appropriate.	Agreed	
Outcomes of assessment/conclusions	The outcomes of the assessment are appropriate and accurately describe the likely impacts.	Agreed	

<p>Adequacy of management and/or mitigation measures where appropriate</p>	<p>The proposed management and mitigation as identified within the ES chapter are appropriate and the relevant Construction Environmental Management Plan principles have been provided within the Code of Construction Practice.</p>	<p>Agreed</p>	
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### **3.9 Noise and Vibration**

- 25 The Project has the potential to impact upon due to noise. These interactions are duly considered within Volume 3, Chapter 10 of the Thanet Extension ES (Application Ref 6.3.10). Table 10 identifies the status of discussions relating to this topic area between the parties.

**Table 10: Status of discussions relating to Noise and Vibration.**

Discussion Point	Thanet Extension Position (it is agreed that)	TDC Position	Final Position
Policy and plans	The relevant plans, policy and legislation have been referred to when considering potential effects from impacts from noise and vibrations associated with the project.	Agreed	
Adequacy of characterisation data	The receiving environment has been adequately characterised and appropriately described.	Agreed	
Adequacy of assessment methodology	The assessment methodology for consideration of effects from impacts from noise and vibrations associated with the project is considered appropriate.	Agreed.	
Outcomes of assessment/conclusions	The outcomes of the assessment are appropriate and accurately describe the likely impacts.	Agreed	

<p>Adequacy of management and/or mitigation measures where appropriate</p>	<p>The proposed management and mitigation as identified within the ES chapter are appropriate and the relevant Construction Environmental Management Plan principles (with regards noise and vibration management) have been provided within the Code of Construction Practice.</p>	<p>Agreed.</p>	
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#### **4 Matters under discussion**

- 26 This section identifies those matters raised by TDC 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 TDC. It is noted that within TDC's relevant representation TDC state:

*The Council does not object to the development on the issues raised above, however believes that these matters should be carefully considered by the Examining Authority. In particular, the Council raises concern at this stage over the short-term construction and long-term operational impacts from noise from the substation at night on residential receptors in Ebbsfleet, and the potential impacts from contaminant releases at the landfill site during the construction phase.*

- 27 No further matters are to be discussed other than those outlined in Table 7 above.