Vattenfall Wind Power Ltd

Thanet Extension Offshore Wind Farm

Statement of Common Ground – Port of London Authority

Relevant Examination Deadline: 1

Submitted by Vattenfall Wind Power Ltd

Date: January 2019

Revision A

Date	Issue No.	Remarks / Reason for Issue	Author	Checked	Approved
08/11/2018	01	Draft for comment from PLA	GoBe	GoBe	VWPL

Table of Contents

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 London Authority (PLA) 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 National Trust 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 PLA, the SoCG is focused on those issues raised by the PLA 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: PLA's Remit;
- Section 3: Consultation;
- Section 4: Agreements Log; and
- Section 5: Summary.

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^2 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 Port of London Authority's Remit

12 PLA's operations cover 95 miles of the River Thames. They work to keep commercial and leisure users safe, protect and enhance the environment and promote the use of the river for trade and travel. PLA actively engage with stakeholders along the Thames, including all river users, local authorities, the Greater London Authority, amenity and interest groups, Government and many other bodies.

3 Consultation

3.1 Application elements under the PLA'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 PLA.

14 The PLA oversees 95 miles of the River Thames. They work to keep commercial and leisure users safe, protect and enhance the environment and promote the use of the river for trade and travel.

15 The technical components of the DCO application of relevance to the PLA (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).

16 Given the concerns raised by PLA within their relevant representation with regards migration of sandwaves the following technical component of the DCO application that is relevant to the PLA is:

- Volume 2, Chapter 2: Marine Physical Processes (Application Ref 6.2.2).

3.2 Consultation Summary

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

Table 1: Consultation undertaken with the PLA pre-application

Date & Type:	Detail:
November 2016 Meeting	Pre-scoping meeting
January 2017 Email correspondence	Pre-scoping

February 2017	Scoping Response
May 2017 Meeting	Pilotage study meeting
July 2017 Meeting	Pilotage study meeting
September 2017 Meeting	Pilotage study workshop
December 2017 Meeting	NRA Meeting
January 2018, S42 Consultation	Comments relating to the Preliminary Environmental Information Report

3.3 Post-application Consultation

18 VWPL has engaged with the PLA 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 PLA is detailed in Table 2.

Table 2: Consultation undertaken with the PLA post-application

Date/ Type:	Detail:
August 2018	Discussion regarding submitted application, confirmation of jurisdiction, findings of the bridge simulation

4 Agreements Log

19 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

20 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	PLA 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 with the Port of London Authority 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 PLA of the development of the project and the predicted impacts on shipping and navigation.		
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.		
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		

Discussion Point	Thanet Extension Position	PLA Position	Final Position
	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		
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		
Environmental Statement Baseline and Methodology	It is agreed that the approach adopted in the Environmental Statement in describing collision risks is appropriate and reflects similar processes undertaken within the Port of London jurisdiction in order to inform management of marine safety.		
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.		
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.		

Discussion Point	Thanet Extension Position	PLA 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.		
Accompanying documentation	It is agreed that the bridge simulation exercise (Application Ref 6.4.10.2) accurately reflects the study undertaken with Port of London Authority and pilotage providers and therefore accurately presents the effects on pilotage associated with the proposed project.		
Wider application	It is agreed that the physical processes chapter (Application Ref 6.2.2) adequately considers the risk of potential migration of sandwaves and accurately concludes that there is a negligible risk of effect on sandwaves within the region.		

Discussion Point	Thanet Extension Position	PLA Position	Final Position
The DCO and risks of navigation channel sedimentation	It is agreed that the physical processes chapter (Application Ref 6.2.2) adequately considers the risk of potential sedimentation at a study area scale and accurately concludes that there is a negligible risk of effect of sedimentation study area.		
The DCO and risks of navigation channel sedimentation	It is agreed that the Condition within the DCO and deemed Marine Licences (Application Ref 3.1) regarding bathymetric monitoring is appropriate to monitor changes in seabed morphology associated with the project.		

5 Matters under discussion

21 This summary section identifies those matters raised by the PLA 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 PLA.

- 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.