

# **Vattenfall Wind Power Ltd**

## **Thanet Extension Offshore Wind Farm**

Appendix 11 to Deadline 1 Submission: Statement  
of Common Ground – Maritime & Coastguard  
Agency (MCA)

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
09/11/2018	01	Draft for review by MCA	GoBe	GoBe	VWPL

## Table of Contents

1	Introduction .....	4
1.1	Overview .....	4
1.2	Approach to SoCG .....	4
1.3	The Development.....	5
2	MCA Remit .....	7
3	Consultation .....	8
3.1	Application elements under the MCA’s remit .....	8
3.2	Consultation Summary.....	8
3.3	Post-application Consultation.....	9
4	Agreements Log .....	10
4.1	Project Description (Offshore) .....	10
4.2	Shipping and Navigation .....	12
5	Matters under discussion .....	16
	Table 1: Consultation undertaken with the MCA pre-application .....	8
	Table 2: Consultation undertaken with the MCA post-application.....	9
	Table 3: Status of discussions relating to Project Description (Offshore) .....	11
	Table 4: Status of discussions relating to Shipping and Navigation .....	13

## 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 Maritime & Coastguard Agency (MCA) 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 MCA 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 MCA, the SoCG is focused on those issues raised by the MCA 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: MCA 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 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 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 MCA Remit

- 12 The MCA's remit for Offshore Renewable Energy Installations (OREIs) is to ensure that the safety of navigation is preserved, and our search and Rescue capability is maintained, whilst progress is made towards government targets for renewable energy. This includes maintaining our obligations under The United Nations Convention of the Law of the Sea.

## 3 Consultation

### 3.1 Application elements under the MCA'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 MCA.
- 14 The technical components of the DCO application of relevance to the MCA (and therefore considered within this SoCG) comprise:
- The draft DCO (Application Ref 3.1);
  - Volume 2, Chapter 10: Shipping and Navigation (Application Ref 6.2.10); and
  - Volume 4, Annex 10-1: Navigation Risk Assessment (Application Ref 6.4.10.1).

### 3.2 Consultation Summary

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

**Table 1: Consultation undertaken with the MCA 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
December 2017 Meeting	NRA 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 MCA since the Thanet Extension development was accepted for examination by the Planning Inspectorate on 23<sup>rd</sup> July 2018. A summary of the post-application consultation with the MCA is detailed in Table 2.

**Table 2: Consultation undertaken with the MCA post-application**

Date/ Type:	Detail:
23 <sup>rd</sup> 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.

### 4.1 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	MCA 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>MCA 041018 – Agreed</i>	Agreed

## 4.2 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	MCA 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.	<b>MCA 041018 – Agreed</b>	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 MCA of the development of the project and the predicted impacts on shipping and navigation.	<b>MCA 041018 – Agreed</b>	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.	<b>MCA 041018</b> - 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	MCA 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	<b>MCA 041018</b> - 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	<b>MCA 041018 – Agreed</b>	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.	<b>MCA 041018 – Agreed</b>	Agreed
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	<b>MCA 041018</b> - MCA does not write its own guidance on tolerability however the statement drafted with MCA and TH is agreed.	Agreed

Discussion Point	Thanet Extension Position	MCA 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.	<b><i>MCA 041018 – Agreed</i></b>	Agreed
dML(s)	It is agreed that Condition 12 (1)(b) and Condition 10 (1)(c) 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.		

## 5 Matters under discussion

20 This summary section identifies those matters raised by the MCA 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 MCA.

- 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.