



Vattenfall Wind Power Ltd

Thanet Extension Offshore Wind Farm

Statement of Common Ground – Kent County Council (KCC)

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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 Kent County Council (KCC) 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 KCC in the Application, and in line with the request made by the Planning Inspectorate within the 'Rule 6' letter published on the 6th November 2018.
- 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 KCC, the SoCG is focused on those issues raised by KCC 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: Kent County Council'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. 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).
- 8 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 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.
- 9 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.

- 10 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 Kent County Council's Remit

- 11 Kent County Council is a prescribed consultee for the proposed development under section 42 of the Planning Act 2008 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.
- 12 Kent County Council is the only relevant County planning authority in which the project is located. In relation to Thanet Extension the Council's responsibilities include engagement in the preapplication process, production of a local impact report (LIR) during the Examination phase and being consulted on the discharge of onshore requirements for some onshore elements of the works, including traffic and access, historic environment and Mitigation Planning.

3 Consultation

3.1 Application elements under Kent County Council's remit

- 13 Work Nos. 3A - 16, detailed in Part 1 of Schedule 1 of the draft DCO describe the elements of Thanet Extension which may affect the interests of KCC.
- 14 Kent County Council is the County Council that governs most of the County of Kent. The authority oversees district councils within Kent, including Thanet and Dover.
- 15 The technical components of the DCO application of relevance to KCC (and therefore considered within this SoCG) comprise:
- Volume 1, Chapter 4: Site Selection and Alternatives (Application Ref 6.1.4);
 - Volume 3, Chapter 1: Project Description (Onshore) (Application Ref 6.3.1);
 - Volume 3, Chapter 4: Tourism and Recreation (Application Ref 6.3.4);
 - Volume 3, Chapter 5: Onshore Biodiversity (Application Ref 6.3.5);
 - Volume 3, Chapter 7: Historic Environment (Application Ref 6.3.7); and
 - Volume 3, Chapter 8: Traffic and Access (Application Ref 6.3.8);
 - Volume 3, Chapter 6: Ground Conditions, Flood Risk and Land Use (Application Ref: 6.3.6);
 - Volume 3, Chapter 9: Air Quality (Application Ref 6.3.9);
 - Volume 3, Chapter 10: Noise and Vibration (Application Ref 6.3.10);
 - Volume 3, Chapter 2: Onshore Landscape and Visual Impact Assessment (Application Ref: 6.3.2);
 - Application document 3.1: draft Development Consent Order; and
 - Offshore Volume 2, Chapters 4 to 7 with regards offshore biodiversity Application Refs 6.2.4-6.2.7; and
 - Application document 5.1 Report to inform Appropriate Assessment

3.2 Consultation Summary

- 16 This section briefly summarises the consultation that VWPL has undertaken with KCC. 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 KCC pre-application

Date & Type:	Detail:
Scoping	Scoping Response provided by KCC
SoCC	KCC engaged in consultation on the SoCC
March 2017 Evidence Plan	Landscape and Visual Panel Technical Panel Meeting
June 2017 Evidence Plan	Landscape and Visual Panel Technical Panel Meeting
June 2017 Evidence Plan	Onshore Historic Environment Technical Panel Meeting
July 2017 Evidence Plan	Offshore General Technical Panel Meeting
October 2017 Evidence Plan	Onshore General Technical Panel Meeting
November 2017 Evidence Plan	Onshore Historic Environment Technical Panel Meeting (received correspondence)
December 2017 Evidence Plan	Ground Conditions, Land use and Hydrology Technical Panel Meeting
January 2018, S42 Consultation	Comments relating to the Preliminary Environmental Information Report
February 2018 Evidence Plan	Terrestrial Ecology Technical Panel Meeting
April 2018 Evidence Plan	Outline Landscape and Ecological Management Plan Meeting

3.3 Post-application Consultation

- 17 VWPL has engaged with KCC 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 KCC is detailed in Table 2.

Table 2: Consultation undertaken with KCC post-application

Date/ Type:	Detail:
28 th August 2018	Update on application documentation and outline Landscape and Ecological Management Plan

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.

4.1 Site Selection and Alternatives

- 19 The Project has analysed and evaluated a range of options regarding the 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). A full project description of the onshore works is provided within Volume 3, Chapter1: Project Description (Onshore) (Application Ref 6.3.1). 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...)	KCC Position	Final Position
Adequacy of information provision	Application Ref 6.1.4 provides a full and detailed account of the considerations and decision-making process undertaken to develop the proposed Order Limits.	Application Ref 6.1.4 provides a detailed account of the considerations and decision-making process undertaken to develop the proposed Order Limits.	
Project optionality	The applicant requires flexibility in the methodology for making landfall as the contents of the landfill, although assumed to be municipal, are unknown.	KCC understands that the applicant requires flexibility in the methodology for making landfall as the contents of the landfill are unknown, although assumed to be PREDOMINANTLY municipal waste (with a chance of other waste also being present).	
Consultation	Following S42 and the consultation concerns raised the design envelope has been changed appropriately and has had due regard to S42 responses.	Following S42 and the consultation concerns raised the design envelope has been changed appropriately and has had due regard to S42 responses.	
Consultation	Following S42 and the consultation concerns raised the chapter has been expanded adequately with additional information with regards to the development of the proposed Order Limits and has had due regard to S42 responses.	Following S42 and the consultation concerns raised the chapter has been expanded adequately with additional information with regards to the development of the proposed Order Limits and has had due regard to S42 responses.	

4.2 Tourism and Recreation

- 20 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 4 identifies the status of discussions relating to this topic area between the parties.

Table 4: Status of discussions relating to Tourism and Recreation.

Discussion Point	Thanet Extension Position	KCC Position	Final Position
Adequacy of characterisation data	The receiving environment has been adequately characterised and appropriately described.	The receiving environment has been adequately characterised and appropriately described.	
Adequacy of assessment methodology	The methods of assessment for tourism and recreation are appropriate.	The methods of assessment for tourism and recreation are appropriate.	
Outcomes of assessment/conclusions	The outcomes of the assessment are appropriate and accurately describe the likely impacts.	The outcomes of the assessment are appropriate and accurately describe the likely impacts.	
Outcomes of assessment/conclusions	The outcomes of the assessment of Pegwell Bay Country Park are appropriate and accurately describe the likely impacts.	TBC – in LIR	
Adequacy of management and/or mitigation measures where appropriate	The proposed management and mitigation as identified within the ES chapter are appropriate.	The proposed management and mitigation as identified within the ES chapter are currently appropriate but are ongoing between KCC and Vattenfall in drafting an OLEMP.	
English Coast Path	The outcomes of the assessment on the English Coast Path is appropriate and accurately describe the likely impacts. Sufficient information and appropriate mitigation for these impacts has been provided within the ES chapter.		

Discussion Point	Thanet Extension Position	KCC Position	Final Position
Public Rights of Way	The Access Management Strategy (Application Ref 8.4) provides sufficient information and appropriately mitigates the impacts of the works on PRow throughout the lifetime of the project.	The Access Management Strategy (Application Ref 8.4) provides sufficient information and appropriately mitigates the impacts of the works on PRow throughout the lifetime of the project.	

4.3 Offshore and onshore Biodiversity

- 21 The Project has the potential to impact upon biodiversity. These interactions are duly considered within Volume 2 of the ES (offshore ornithology, subtidal and intertidal ecology, fish and shellfish ecology, marine mammals - Application Refs 6.2.4, 6.2.5, 6.2.6, 6.2.7), Volume 3, Chapter 5 of the Thanet Extension ES (Application Ref 6.3.5), and the Report to Inform Appropriate Assessment (Application Ref 5.2). Table 5 identifies the status of discussions relating to this topic area between the parties.

Table 5: Status of discussions relating to Onshore and offshore Biodiversity, and Habitats Regulations Assessment.

Discussion Point	Thanet Extension Position	KCC Position	Final Position
Adequacy of characterisation data	The receiving environment has been adequately characterised and appropriately described.		
Adequacy of characterisation data	The surveys undertaken were appropriate to characterise the receiving environment.		
Adequacy of assessment methodology	The methods of assessment for onshore biodiversity are appropriate.		
Outcomes of assessment/conclusions	The outcomes of the assessment are appropriate and accurately describe the likely impacts.		
Adequacy of management and/or mitigation measures where appropriate	The proposed management and mitigation as identified within the ES chapter(s) and RIAA (Application Ref 5.1) are appropriate		
Mitigation Measures	The mitigation proposed (Construction Environmental Management Plan and Code of Construction Practice (Application Ref 8.1)) is adequately secured in the DCO.		

Discussion Point	Thanet Extension Position	KCC Position	Final Position
Outline Landscape and Ecology Management Plan	The OLEMP (Application Ref 8.7) provides sufficient detail of in-principle management measures.		
Outline Landscape and Ecology Management Plan	The OLEMP provides sufficient information on outline details of proposed biodiversity enhancements and proposed monitoring.		
Saltmarsh Mitigation and Management Plan	The Saltmarsh Mitigation, Reinstatement and Management Plan (Application Ref 8.13) provides sufficient information and is adequately secured in the DCO.		

4.4 Onshore Historic Environment

- 22 The Project has the potential to impact upon the onshore historic environment. These interactions are duly considered within Volume 3, Chapter 7 of the Thanet Extension ES (Application Ref 6.3.7). Table 6 identifies the status of discussions relating to this topic area between the parties.

Table 6: Status of discussions relating to Onshore Historic Environment.

Discussion Point	Thanet Extension Position	KCC Position	Final Position
Adequacy of characterisation data	The receiving environment has been adequately characterised and appropriately described.	The receiving environment has been adequately characterised and appropriately described. There is some residual uncertainty on the presence of anti-invasion defences which will need to be established and where appropriate impacts avoided during the scheme.	
Adequacy of assessment methodology	The methods of assessment for onshore historic environment are appropriate	The methods of assessment for onshore historic environment are appropriate	
Outcomes of assessment/conclusions	The outcomes of the assessment are appropriate and accurately describe the likely impacts.	The outcomes of the assessment are appropriate and accurately describe the likely impacts.	
Adequacy of management and/or mitigation measures where appropriate	The proposed management and mitigation as identified within the ES chapter are appropriate	We agree with the general approach to mitigation set out in paragraph 7.16.1 however we disagree with the mitigation proposed for the effects of the excavation of the cable route on potential (presently unidentified) buried anti-invasion heritage assets. We remain of the view that should non-designated assets of the defences be encountered in the cable route then it may be appropriate depending on their	

Discussion Point	Thanet Extension Position	KCC Position	Final Position
		form and preservation that consideration is given to avoidance of physical impact on these through design of the cable route rather than a programme of recording.	
Adequacy of management and/or mitigation measures where appropriate	The onshore Written Scheme of Investigation is adequately secured in the DCO.	We look forward to agreeing a Written Scheme of Investigation that can be secured through the DCO. The WSI needs to take account of the need to protect additional discovered anti-invasion defences as appropriate.	

4.5 Traffic and Access

- 23 The Project has the potential to impact upon traffic and access routes (including Public Rights of Way). These interactions are duly considered within Volume 3, Chapter 8 of the Thanet Extension ES (Application Ref 6.3.8). Table 7 identifies the status of discussions relating to this topic area between the parties.

Table 7: Status of discussions relating to Traffic and Access.

Discussion Point	Thanet Extension Position	KCC Position	Final Position
Adequacy of characterisation data	The receiving environment has been adequately characterised and appropriately described.	KCC Highways and Transportation have agreed that no further capacity assessment of the highway network is required beyond that already included in the ES.	
Adequacy of assessment methodology	The methods of assessment for Traffic and Access are appropriate	The proposed site access points have been agreed in principle but will require the submission of full details to be agreed with the Highway Authority. The principles of traffic management and mitigation during construction are acceptable but details will need to be agreed through submission of the Construction Traffic Management Plan.	
Outcomes of assessment/conclusions	The outcomes of the assessment are appropriate and accurately describe the likely impacts.	KCC Highways and Transportation have agreed that no further capacity assessment of the highway network is required beyond that already included in the ES.	

Discussion Point	Thanet Extension Position	KCC Position	Final Position
Adequacy of management and/or mitigation measures where appropriate	The proposed management and mitigation as identified within the ES chapter are appropriate	The proposed site access points have been agreed in principle but will require the submission of full details to be agreed with the Highway Authority. The principles of traffic management and mitigation during construction are acceptable but details will need to be agreed through submission of the Construction Traffic Management Plan.	
Adequacy of management and/or mitigation measures where appropriate	Construction Traffic Management Plan will be agreed with KCC post-consent (if granted).	Construction Traffic Management Plan will be agreed with Vattenfall post-consent (if granted).	
Adequacy of management and/or mitigation measures where appropriate	The principles for traffic management are adequately outlined in the Code of Construction Practice (Application Ref 8.1) and are adequately secured within the DCO.	The principles for traffic management are adequately outlined in the Code of Construction Practice (Application Ref 8.1) and are adequately secured within the DCO.	

4.6 Ground Conditions

- 24 The Project has the potential to impact upon Ground Conditions, Flood Risk and Land Use. These interactions are duly considered within Volume 3, Chapter 6 of the Thanet Extension ES (Application Ref 6.3.6). Table 8 identifies the status of discussions relating to this topic area between the parties.

Table 8: Status of discussions relating to Ground Conditions.

Discussion Point	Thanet Extension Position	KCC Position	Final Position
Adequacy of characterisation data	The receiving environment has been adequately characterised and appropriately described.		
Adequacy of assessment methodology	The methods of assessment for ground conditions are appropriate		
Outcomes of assessment/conclusions	The outcomes of the assessment are appropriate and accurately describe the likely impacts.		
Adequacy of management and/or mitigation measures where appropriate	The proposed management and mitigation as identified within the ES chapter are appropriate.		
Adequacy of management and/or mitigation measures where appropriate	The mitigation proposed (Construction Environmental Management Plan, Contaminated Land and Groundwater Management Plan and Code of Construction Practice) is adequately secured in the DCO.		

4.7 Air Quality, Noise and Vibration

- 25 The Project has the potential to impact upon the air quality, and noise and vibration. These interactions are duly considered within Volume 3, Chapter 9 and 10 of the Thanet Extension ES respectively (Application Refs 6.3.9 and 6.3.10 respectively). Table 9 identifies the status of discussions relating to this topic area between the parties.

Table 9: Status of discussions relating to Air Quality, Noise and Vibration.

Discussion Point	Thanet Extension Position (it is agreed that)	KCC Position	Final Position
Policy and plans	The relevant plans, policy and legislation have been referred to when considering potential effects on air quality, noise and vibration.		
Adequacy of characterisation data	The receiving environments have been adequately characterised and appropriately described.		
Adequacy of assessment methodology	The assessment methodologies for consideration of effects is considered appropriate.		
Outcomes of assessment/conclusions	The outcomes of the assessments are appropriate and accurately describe the likely impacts.		
Adequacy of management and/or mitigation measures where appropriate	The proposed management and mitigation as identified within the ES chapters are appropriate and the relevant Construction Environmental Management Plan principles have been provided within the Code of Construction Practice (Application Ref 8.1).		

4.8 Outline Landscape and Ecological Management Plan

- 26 The Project has the potential to impact upon the onshore landscape. These interactions are duly considered within Volume 3, Chapter 2 of the Thanet Extension ES (Application Refs 6.3.2). Table 10 identifies the status of discussions relating to the Outline Landscape and Ecology Management Plan between the parties.

Table 10: Status of discussions relating to the OLEMP

Discussion Point	Thanet Extension Position (It is agreed that)	KCC Position	Final Position
Outline Landscape and Ecology Management Plan	The OLEMP (Application Ref 8.7) provides sufficient detail of in-principle management measures.		
Outline Landscape and Ecology Management Plan	The OLEMP provides sufficient information on outline details of proposed landscape enhancements.		

5 Matters under further discussion

- 27 This section identifies those matters raised by KCC 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 KCC.
- 28 The matters remaining under discussion with KCC include:
- Pegwell Country Park:
 - The applicant understands that laying the cables underground in the Pegwell Bay Country Park is KCC's strong preference;
 - The applicant understands that the introduction of a secondary berm is considered not acceptable from KCC park management and business perspective.
 - The applicant understands that the introduction of a secondary berm is not acceptable by KCC due to landscape and visual impacts;
 - Ground Conditions:
 - The applicant understands that they are responsible (and therefore liable) for preventing the introduction of new pathways of landfill gases and leachate as a result of the site investigation and construction works of the onshore cable route.
 - The applicant has provided a sufficiently detailed Report to Inform Appropriate Assessment to enable the Planning Inspectorate to undertake an HRA;
 - The applicant has provided a sufficient detailed Written Scheme of Investigation (Application Ref 8.6) for offshore works and this has been adequately secured within the DCO.