

Vattenfall Wind Power Ltd

Thanet Extension Offshore Wind Farm

Statement of Common Ground – Historic England

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
12/11/19	01	Provided to Historic England	GoBe	GoBe	VWPL
15/01/19	02	Revised document provided by Historic England	HE	HE	VWPL

Table of Contents

1	Introduction	4
1.1	Overview	4
1.2	Approach to SoCG	4
1.3	The Development.....	5
2	Historic England’s Remit	7
3	Consultation	8
3.1	Application elements under Historic England’s remit	8
3.2	Consultation Summary.....	8
3.3	Post-application Consultation.....	9
3.4	Agreements Log	10
	Offshore Archaeology and Cultural Heritage.....	11
	Onshore Historic Environment	14
4	Matters under discussion	17
	Table 1: Consultation undertaken with the Historic England pre-application	9
	Table 2: Consultation undertaken with Historic England post-application.....	10
	Table 3: Status of discussions relating to Offshore Archaeology and Cultural Heritage.....	12
	Table 4: Status of discussions relating to Onshore Historic Environment.....	15

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 Historic England (HE) 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 HE 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 draft SoCG has been prepared by the applicant and focuses on the issues and matters raised by Historic England in response to the formal EIA Scoping Exercise, and the Preliminary Environmental Information Report consultation (s. 42) conducted as part of the pre-application process, and in relation to the Applications Environmental Statement and supporting information.
- 5 The structure of the SoCG is as follows:
 - Section 1: Introduction;
 - Section 2: Consultation; and
 - Section 3.4: Agreements Log;

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:
 - 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 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.
- 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 Historic England's Remit

- 12 The Historic Buildings and Monuments Commission for England (HBMCE), known as Historic England, is the Government's statutory adviser in relation to the historic environment in England. It was set up by the National Heritage Act 1983, and the National Heritage Act (2002) gave HBMCE responsibility for maritime archaeology in the English area of the UK Territorial Sea.
- 13 HBMCE is a Non-Departmental Public body sponsored by the Department for Digital Culture, Media and Sport (DCMS). Our remit in the historic environment intersects with the policy responsibilities of a number of other government departments – particularly the Ministry of Housing, Communities and Local Government, with their responsibilities for land use planning matters.

3 Consultation

3.1 Application elements under Historic England's remit

- 14 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 HE.
- 15 The technical components of the DCO application of relevance to HE (and therefore considered within this SoCG) comprise:
- Volume 1 Chapter 3: Environmental Impact Assessment Methodology (Application Ref 6.1.3);
 - Volume 2 Chapter 2: Marine Geology, Oceanography and Physical Processes – Application Ref 6.2.2);
 - Volume 2, Chapter 13: Offshore Archaeology and Cultural Heritage (Application Ref 6.2.13);
 - Volume 3, Chapter 7: Historic Environment (Application Ref 6.3.7);
 - Volume 4, Annex 13.1 and Annex 13.2 technical baseline documents (Application Refs 6.4.13.1 and 6.4.13.2 respectively);
 - Application document 8.6 Offshore Written Scheme of Investigation (Application Ref 8.5); and
 - Application document 3.1 Draft Development Consent Order (Application Ref 3.1)

3.2 Consultation Summary

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

Date & Type:	Detail:
21/10/2016 Pre-scoping exercise & evidence plan meeting	Head of Marine Planning attended pre-scoping exercise meeting with Vattenfall and consultants.
11/11/2016	HE returned comments on draft Evidence Plan for pre-application consultation to consultants and developer.
27/2/2017 Technical Review Panel	HE attendance at Onshore Expert Topic Group Workshop at Sandwich (Kent).
28/2/2017 technical Review Panel	HE attendance at Offshore Expert Topic Group Workshop in London.
4/10/2017	HE attendance at Preliminary Environmental Information Report (PEIR) consultation workshop: coastal/marine archaeology & seascape and landscape in Ramsgate.
12/11/18, S42 Consultation	HE comments returned relating to the Preliminary Environmental Information Report.
31/1/2018 PEIR submission comments discussions	HE took part in phone conference with consultants to review HE PEIR submission comments for marine archaeological components.

3.3 Post-application Consultation

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

Table 2: Consultation undertaken with Historic England post-application

Date/ Type:	Detail:
17 th October 2018	Meeting to discuss the documents submitted as part of the DCO application in relation to marine archaeology and historic environment matters and Historic England 500 word summary within Planning Inspectorate Registration and Relevant Representation. Meeting to discuss the development of a SoCG
5 th December 2018	TBC – site visit with Historic England to review assessments on setting

3.4 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.

Offshore Archaeology and Cultural Heritage

- 19 The Project has the potential to impact upon offshore archaeology and cultural heritage. These interactions are duly considered within Volume 2, Chapter 13 of the Thanet Extension ES, with control mechanisms and mitigation measures provided for within the DCO and dML(s). Table 3 identifies the status of discussions relating to this topic area between the parties.

Table 3: Status of discussions relating to Offshore Archaeology and Cultural Heritage.

Discussion Point	Thanet Extension Position	HE Position	Final Position
Policy and Planning	The assessment has identified all appropriate plans and policies relevant to historic environment assessment and has given due regard to them within the assessment.		
Consultation	The ES chapter has been adequately updated following S42 and Evidence Plan consultation and concerns raised have been adequately addressed or clarified.		
Scope and Assessment methodology	The potential impacts identified are appropriate and accurate for the relevant receptors.		
	The study area defined for the assessment is appropriate for the impacts considered.		
Baseline data used in the assessment	Sufficient primary and secondary data has been collated to appropriately characterise the baseline environment for the purposes of informing the EIA.		
	The scopes and methodologies undertaken for the viewpoints were adequate for characterising the baseline and informing photomontage drafting.		

Discussion Point	Thanet Extension Position	HE Position	Final Position
	All data gaps have been highlighted and all appropriate measures for filling any data gaps have been proposed.		
Mitigation Measures	The embedded mitigation measures are considered appropriate and are appropriately secured through the DCO.		
	The Outline WSI (Application Ref 8.3) is appropriate with regards landscape management principles.		
Outcomes of the EIA	The assessment criteria and assignment of significance is appropriate.		
	The sensitivity and importance of the receiving environment is accurately described within the Environmental Statement.		
	The conclusions of the assessment accurately reflect the potential impacts on the receiving environment within the study area.		
	The cumulative effects have been adequately and appropriately described within the ES and the conclusions are appropriate.		

Onshore Historic Environment

- 20 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, with control and mitigation measures provided for within the DCO. Table 4 identifies the status of discussions relating to this topic area between the parties.

Table 4: Status of discussions relating to Onshore Historic Environment.

Discussion Point	Thanet Extension Position	HE Position	Final Position
Policy and Planning	The assessment has identified all appropriate plans and policies relevant to onshore historic environment and heritage setting and has given due regard to them within the assessment.		
Consultation	The ES chapter has been adequately updated following S42 and Evidence Plan consultation and concerns raised have been adequately addressed or clarified.		
Scope and Assessment methodology	The potential impacts identified are appropriate and accurate for the relevant receptors.		
	The study area defined for the assessment is appropriate for the impacts considered.		
	The methods for assessing potential impacts on heritage setting is considered appropriate.		
Baseline data used in the assessment	Sufficient primary and secondary data has been collated to appropriately characterise the baseline environment for the purposes of informing the EIA.		

Discussion Point	Thanet Extension Position	HE Position	Final Position
	The scopes and methodologies undertaken for the viewpoints were adequate for characterising the baseline and informing photomontage drafting.		
	All data gaps have been highlighted and all appropriate measures for filling any data gaps have been proposed.		
Mitigation Measures	The embedded mitigation measures are considered appropriate and are appropriately secured through the DCO.		
Outcomes of the EIA	The assessment criteria and assignment of significance is appropriate.		
	The sensitivity and importance of the receiving environment is accurately described within the Environmental Statement.		
	The conclusions of the assessment accurately reflect the potential impacts on the receiving environment within the study area.		
	The cumulative effects have been adequately and appropriately described within the ES and the conclusions are appropriate.		

4 Matters under discussion

- 21 This summary section identifies those matters raised by HE 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 HE.

Vattenfall Wind Power Ltd

Thanet Extension Offshore Wind Farm

Appendix 7, Annex A to Deadline 1 Submission:
TEOW Site Visit/Meeting Record

Relevant Examination Deadline: 1

Submitted by Vattenfall Wind Power Ltd

Date: January 2019

Revision A

Drafted By:	Wessex Archaeology
Approved By:	Daniel Bates
Date of Approval:	January 2019
Revision:	A

Revision A	Original Document submitted to the Examining Authority
N/A	
N/A	
N/A	

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TEOW Site Visit/Meeting Record 5th December 2018

Chair	
Attendees (names / initials)	Mark Turner (Wessex Archaeology) (MT) Alice Brockway (Historic England (HE)) (AB) Isabelle Ryan (Historic England (HE)) (IR)
cc:	Sean Leake (GoBe) Dan Bates (Vattenfall)

Item	Details	Lead	Actions
Apologies	N/A		
Previous meeting notes & update on actions	N/A		
H&S	N/A		
Accompanied Visit to Selected Viewpoints	<p>Starting at Pegwell Bay Hotel. Conditions, overcast and occasional rain.</p> <p>MT began with some explanation of the changes in methodology used in the assessment compared to that presented in the PEIR, this largely focussed on the operation of the matrix, and also in a more considered approach to “setting” as affecting “Significance”, rather than simple degree of change in setting.</p> <p>It was then agreed to proceed to three key viewpoints to discuss differences in opinion and to test the assessment. Viewpoint numbers are those given in the SLVIA. A full size hard copy of the SLVIA viewpoint figures/montages was taken along to provide reference and inform the discussion.</p>		
Viewpoint 2 West Brook	<p>Debate concentrated on the perception of moving blades above the historic roofline of the town. Whilst recognising that the viewpoint includes modern and large-scale structures as well as church spires, AB considers that the presence of the turbines over the town does change the way in which the town is viewed. Here the interest is on the way that the historic frontage frames the bay (and it is also a Conservation Area). AB/IR consider that the TEOW turbines blur the separation of town from the seascape by being visible above the roof line (as if the turbines extended some way inland) and above the Conservation Area. The movement further blurs this relationship, and to some extent detracts from the view. AB drew contrast between the sea scape as a dynamic environment with the town/terrestrial environment which in this view is essentially static.</p> <p>MT contended that the significance of the individual assets within the Conservation Area is unaffected, and that the relationship of the frontage to the bay is still clear. MT noted that the effect would diminished the closer the viewer got to the town as the turbines dipped behind the skyline. MT did recognise ABs arguments and conceded that there is some blurring</p>		

	<p>of the townscape/seascape relationship, as referred to by AB, and that this might constitute a degree of harm to the Conservation Area.</p> <p>Both parties agreed that any harm was “less than substantial”, and effectively could not be reduced further without losing the benefit of the scheme.</p>		
Viewpoint 14 Walpole Bay (Margate)	<p>The potential issue here was whether the turbines cause any harm as the make landfall in the view, so some extent blurring the seascape/terrestrial boundary.</p> <p>Whilst the VP is within the Conservation Area, the land that the Turbines appears to be behind is not, and views in this direction along the coast (in this view) do not positively contribute to the character and appearance of the area.</p> <p>AB (whilst reserving HEs opinion) did not think this effect was the same in that the character and appearance of the Area was probably not harmed in this respect (the turbines being out of the Area where they appear to make landfall).</p> <p>It was noted that views to sea here are important, but the availability of the views (in what is a dynamic environment) that is important.</p>		
Viewpoint 4 Kingsgate	<p>Discussion was had regarding the interrelationship of the Captain Digby to the Castle as these buildings frame the bay, and to the Listed Building that fronts onto the bay, albeit set back and behind the road here. It was agreed that whilst seaward views form an important part of the settings of all three buildings (less so in the case of the Captain Digby Inn), it is the availability of views out to sea that is important not what is visible to sea. The setting of all these buildings is tied to each other both visually and by historic association.</p> <p>MT contended that despite the visibility of the TEOW turbines, this change in setting does not change the significance of the assets, as their relationship and historic etc. associations are not changed, not is the ability to appreciate this diminished. MT noted that the TEOW do not “close off” the bay, and that the existing wind farm is in any case visible.</p> <p>Both parties agreed that the Conservation Area as a whole is not affected(harmed) as the majority of the Area lies to the south and has no visibility with the TEOW scheme. It was agreed that the principal relationship between the three listed buildings was unharmed. Whilst Historic England reserved their position, they considered that there was any harm, it would be less than substantial.</p>		
Viewpoint 5 Broadstairs Promenade	<p>Both parties agreed that TEOW would constitute a change in setting so that the Conservation Area would be subject to a degree of harm.</p> <p>It was agreed that, whilst the seascape does constitute a dynamic environment, there is some intrusion of the TEOW turbines over the edge of the town with one turbine being visible above the roofline</p>		

	<p>and adjacent to Bleak House (and within the Conservation Area).</p> <p>The Broadstairs area front over the harbour and beach and shows how the Nineteenth century fishing port became a resort in its own right, but this being of a scale different to Margate and Ramsgate, and to some degree more intimate. Whilst the existing scheme is visible from the promenade, the TEOW scheme is considerably closer and clearly of a different scale. The blurring of townscape and seascape (as was note in the West Brook viewpoint) is what is considered to contribute to a degree of harm, as well as a change in the character of the Area (as the wind farm brings large scape industrial elements significantly closer to the shoreline).</p> <p>Both parties agreed that there is some harm to the Area (in terms of an effect on character and appearance), but this is less than substantial.</p>		
General	<p>It was agreed that most other VPs were sufficiently distant that there was unlikely to be any significant effect on the significance of any terrestrial assets. HE are content that KCC lead on terrestrial archaeology, but said that the HE Kent/SE scientific advisor is available for advice, particularly in relation to geoarchaeology etc. issues and interface between marine and terrestrial.</p>		
Conclusion	<p>Both parties agreed that where there is any harm, that harm is less than substantial.</p> <p>The harm identified was the product of the blurring of townscape and seascape where turbines were effectively seen above land/rooflines of Conservation Areas, this being an effect on character and/or appearance of the relevant Conservation Areas.</p> <p>It was agreed that by and large, mitigation was impractical without loss of the benefits of the proposal.</p>		
AOB	N/A		
Review of actions	N/A		

Date of next meeting:	N/A
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