

Vattenfall Wind Power Ltd Thanet Extension Offshore Wind Farm

Appendix 6 to Deadline 1 Submission: Statement of Common Ground – Highways England (HE)

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

- 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).
- This SoCG with Highways 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.
- 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

- This SoCG has been developed during the pre-examination phase of the Thanet Extension. In accordance with discussions between the Applicant and HE, the SoCG is focused on those issues raised by HE 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: Highways England Remit
 - Section 3: Consultation; and
 - Section 4: Agreements Log.



1.3 The Development

- 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.
- 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).
- 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) (Document Ref: 6.2.1) and Volume 3, Chapter 1: Project Description (Onshore) (Document Ref: 6.3.1) of the Environmental Statement.



2 Highways England Remit

- Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.
- Highways England would be concerned about any proposals that could have an adverse impact on the safety, reliability or operation of the SRN, in this case particularly with regards to the M2 and the A2 from the M2 Junction 7 to Dover.



3 Consultation

3.1 Application elements under Highways England's remit

- 14 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 HE.
- Highways England is the government-owned company charged with operating, maintaining and improving England's motorways and major A roads.
- The technical components of the DCO application of relevance to HE (and therefore considered within this SoCG) comprise:
 - Volume 3, Chapter 8: Traffic and Access (Document Ref: 6.3.8).

3.2 Consultation Summary

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 HE pre-application

Date & Type:	Detail:
2017 Review Panel	Human Environment
January 2018, S42 Consultation	Comments relating to the Preliminary Environmental Information Report

3.3 Post-application Consultation

Date: December 2018

18 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 HE post-application

Date/ Type:	Detail:
15 th October email correspondence	Email correspondence regarding the review of the application and Highways England confirming that the documents are adequate, Highways England have no residual concerns, and consider there to be no further requirement for ongoing discussion until postconsent/detailed design stage.



4 Agreements Log

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 Evidence Plan

Date: December 2018

During Pre-application, continued dialogue, as outlined in Table 1, was undertaken between VWPL and HE. Table 3 identifies the status of discussions relating to this topic area between the parties.



Table 3: Status of discussions relating to the Evidence Plan.

Discussion Point	Thanet Extension Position	HE Position	Final Position
Traffic details	Initial details on traffic numbers, two-way movement, highway links provided to HE.	HE are only concerned with SRN. Interested in home locations and shift patterns. No concerns for operation movements on SRN.	Agreed



4.2 Traffic and Access

Date: December 2018

21 The Project has the potential to impact upon traffic and access. These interactions are duly considered within volume 3, chapter 8 of the Thanet Extension ES. Table 4 identifies the status of discussions relating to this topic area between the parties.



Table 4: Status of discussions relating to Traffic and Access.

Discussion Point	Thanet Extension Position	HE Position	Final Position
SRN concerns	The impact on the SRN is likely to be minimal given the distance between the SRN and site.	Cable and substation operation / maintenance will generate limited trips and therefore are not likely to have a material impact on the SRN.	Agreed
SRN concerns	There will be no material effect on the SRN from the HGV and LGV movements associated with the project construction.	The Offshore Wind Farm (OWF) will generate both HGV and LGV trips. 48 two-way HGV movements per year, equating to less than one movement per fortnight (assuming a flat profile), would be unlikely to have a material impact on the SRN.	Agreed
SRN concerns	There will be no material effect on the SRN from trips associated with visits to the Ramsgate Vattenfall office.	50 two-way LGV movements to the Ramsgate Vattenfall office (relating to the OWF) are unlikely to have a material impact. This is based on an assumption that a maximum of 24 movements (either "arrival" or "departure") would be generated in any one hour in the worst-case. Considering the location of the office, almost 30 miles north of the SRN (A2 at Whitfield) it is unlikely that a significant volume of trips would use the SRN, with movements being diluted across the Local Road Network.	Agreed



Discussion Point	Thanet Extension Position	HE Position	Final Position
SRN concerns	The peak LV movements will not have a significant effect on the SRN	The Peak LV generation (worst-case) comprises 112 staff LVs and 88 LGVs across a 12 hour working day (0700-1900), of which most are likely to be generated outside of network Peak Hours and have local origins / destinations. It is unlikely that a significant volume would be generated on the SRN during Peak periods.	Agreed
SRNs	The HGV movements will not have a significant effect on the SRN.	HGV volumes will vary over time – the peak HGV generation will be around 351 round trips (worst-case). A flat delivery programme of 12 hours would result in approximately 58 trips per hour. However, the programme indicates that this will only occur for 3-4 days and therefore any impacts will be temporary. Other peaks within the programme indicate around 176 two-way trips, or 14 two-way trips per hour. This scale of additional HGV trips would be unlikely to have a material impact on the SRN.	Agreed
DCO	Adequate control measures and management plans have been considered and secured within the DCO.	Measures have been secured in the Code of Construction Practice (CoCP) regarding the need to manage the traffic as part of the Thanet Extension. These measures, in addition to details on construction programme, peak construction movements, and potential impact mitigation, will	Agreed



Discussion Point	Thanet Extension Position	HE Position	Final Position
DCO	Adequate control measures and management plans have been considered and secured within the DCO.	be further defined in a Construction Traffic Management Plan (CTMP) submitted for approval post-consent. The CTMP is secured by requirement in the draft DSCO. The following relevant measures and principles are incorporated into the CoCP: Traffic routing strategy – ensuring vehicles access via the most appropriate route; Traffic timing strategy – programme vehicles arrivals / departures and working hours to lessen the traffic impact on the highway network; Travel planning measures – will provide details of how staff should travel by alternative modes to reduce single occupancy vehicles travelling to the site; The linear nature of the project will allow for an even distribution of activities and associated daily HGV demands; The CoCP contains the principles of a Staff Travel	Agreed
AIL	Abnormal and Indivisible Loads have been considered appropriately	Plan. An Abnormal Indivisible Load Access Study has been produced for the two AIL trips expected. Approval in Principal (AIP) has been provided for	Agreed



Discussion Point	Thanet Extension Position	HE Position	Final Position
		the transportation of the SGT from the Port of	
		Ramsgate. Once formal details on the load	
		specifications and haulier are finalised HE will	
		need to be consulted to provide an AIP for the	
		remaining Route Options.	
		On the basis of the above, we are satisfied that	
Overall position	It is considered that the project will not have any material effect on the SRN.	the proposals will not materially affect the safety,	
		reliability and / or operation of the SRN (the tests	Agreed
		set out in DfT C2/13 para 10 and DCLG NPPF para	
		32).	

