

Vattenfall Wind Power Ltd

Thanet Extension Offshore Wind Farm

Appendix 10 to Deadline 3 Submission: Written
Summary of Vattenfall's Oral Case put at the Issue
Specific Hearing 4

Relevant Examination Deadline: 3

Submitted by Vattenfall Wind Power Ltd

Date: March 2019

Revision A

| | |
|-------------------|---------------------------|
| Drafted By: | Vattenfall Wind Power Ltd |
| Approved By: | Daniel Bates |
| Date of Approval: | March 2019 |
| Revision: | A |

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

Copyright © 2019 Vattenfall Wind Power Ltd
All pre-existing rights retained

Contents

| | | |
|-----|--|----|
| 1 | Introductory Remarks | 4 |
| 1.1 | Introduction of the Participating Parties | 4 |
| 2 | Agenda Item 2 - Effects on Landscapes and Seascapes..... | 5 |
| 2.1 | a) Effects on landscapes and seascapes..... | 5 |
| | Effects on landscapes – relevant comments from interested parties..... | 5 |
| 2.2 | b) Effects on Seascapes | 6 |
| | Comments from Interested Parties | 6 |
| | Applicant's Response | 7 |
| | (1) Mitigation of effects from DDC | 7 |
| | (2) White Cliffs of Dover..... | 9 |
| | (3) Envelope approach | 10 |
| 3 | Agenda Item 3 – Effects on the Historic Environment | 13 |
| 4 | Agenda Item 4 - Review of issues and actions arising | 15 |

1 Introductory Remarks

- 1 This note summarises the Applicant's case as presented at the Issue Specific Hearing held on 19 January 2019 at the Discovery Park, Ramsgate Road, Sandwich (the "IS Hearing").
- 2 The note follows the structure of the Agenda for the Issue Specific Hearing on 19 January 2019 ("the Agenda"). Where an item was discussed at the IS Hearing that was not on the Agenda it has been marked as an "Additional Agenda Item" within this document.

1.1 Introduction of the Participating Parties

- 3 Jennifer Holgate (Womble Bond Dickinson) spoke on behalf of the Applicant.
- 4 Oral representations were made from the following interested parties:
 - Stuart Churchley (SC) (Historic England); and
 - Lucinda Roach (LR) (Dover District Council (DDC)).
- 5 Oral representations by way of responses were made by the following:
 - Jennifer Holgate (JH);
 - Daniel Bates (DBA);
 - Sean Leake (SEL);
 - Ed Simons (ES);
 - Euan McNeill (EM); and
 - Simon Martin (SM).

2 Agenda Item 2 - Effects on Landscapes and Seascapes

2.1 a) Effects on landscapes and seascapes

Effects on landscapes – relevant comments from interested parties

- 6 The ExA wanted to make sure they had a clear understanding of any remaining concerns from Interested Parties who were present for the purposes of the hearing.
- 7 ***The ExA asked DDC if the DM15 policy they have reviewed is an onshore policy for the Dover countryside and if the proposed development might result in adverse effects on the countryside.***
- 8 DDC confirmed that DM15 relates only to onshore impacts.
- 9 ***The ExA asked DDC about progress on adopted policy.***
- 10 DDC confirmed that the new local plan is at a very early stage and it is unlikely there would be further substantial progress until the end of the year. The ExA asked if the same applies to DM16, which was confirmed by DDC.
- 11 ***The ExA asked DDC whether with regard to landscape character, the concern relates to effects of the onshore infrastructure.***
- 12 This was confirmed by DDC.
- 13 ***The ExA asked in relation to the siting and design of the onshore substation and the surrounding connection infrastructure in context of Richborough and adjacent areas, if these are the areas that DDC are not raising specific issues or concerns with.***
- 14 DDC agreed that the mitigation measures put forward by the Applicant were acceptable.
- 15 ***The ExA explained that the Applicant has removed landfall Option 2 and asked how much that is in DDC's area district.***
- 16 DDC confirmed it is in the area of Thanet District Council. Now that landfall Option 2 has been removed from the proposal DDC does not have concerns about the landscape and visual effects of the onshore cable route.
- 17 DDC had no other matters to raise with regards to effects on landscape character.

2.2 b) Effects on Seascapes

Comments from Interested Parties

- 18 The ExA explained that DDC raised concerns regarding turbine locations and related to that the potential for adverse visual effects and the need for additional mitigation. The ExA emphasised that these turbine positions are indicative only, as the project could be constructed anywhere within the red line boundary (**RLB**) (Order Limits).
- 19 ***The ExA asked if the area in the RLB in DDC's view gives raise to general concerns and if there should be a constraint in that area.***
- 20 LR of DDC explained that she is not qualified in the landscape field and that the comments put forward by DDC were from another colleague. DDC clarified that the worst case scenario related to the wider "spread" of the turbines in the view.
- 21 ***The ExA asked DDC to show the areas of concerns on the appropriate environmental statement figures.***
- 22 Figure 12.APP-126 was referred to and the SLVIA reviewed in that context. DDC explained that the turbines further to the south of the layout will have more impact on the seascape.
- 23 ***The ExA asked for what kind of mitigation DDC seeks.***
- 24 DDC explained that the only mitigation they consider possible would be if the turbines were spaced closer together, in order that occupy a smaller and more defined area rather than being spread out. DDC explained that this was clarified in para 3.3.5 of their LIR.
- 25 The ExA explained that DDC also raised an issue regarding seascape from the sea view and land view relating to the significance of the iconic nature of the White Cliffs of Dover. DDC confirmed that their Local Impact Report did not intend to specifically raise this as a point of concern.
- 26 ***The ExA asked DDC for further observations; as this is a broad historic matter the ExA asked Historic England for the nature of the impacts, observation and mitigation with this regard.***
- 27 DDC did not have anything further to add to what is already stated LIR.
- 28 HE did not have any immediate concerns, advising that consultation was needed with HE offshore team, but considered there was no harm.

(a) Action: The ExA asked HE to have that consultation specifically on seascape view/setting of the White Cliffs from the sea including the combination of the existing wind farms and proposed development and put a written confirmation of their definitive position by D3 on whether they think that the view of White Cliffs of Dover will not be impacted.

- 29 The ExA explained that the Applicant's project is a proposed extension to an existing wind farm and in part located close to the land and also considered it was the first such application that that was designed by enveloping (wrapping around) the existing Wind Turbine Generators (WTGs)) for the existing Thanet Wind Farm. The ExA could not recall another instance of enveloping aspect in other projects. The ExA explained further that there were other extensions they were aware of but more linear extensions and, as such, not designed in this "envelope" form. The ExA were concerned that in terms of cumulative effect on views, the legibility of the original Thanet offshore wind farm is not clearly maintained.

Applicant's Response

- 30 Ms Holgate summarised the issues raised by the parties present to be (1) mitigation of the effects caused by the offshore WTG array area, as discussed or agreed with DDC; (2) potential effects on views to and from the White Cliffs of Dover; and (3) the potential novelty of the enwrapping or "envelope" approach to the development.

(1) Mitigation of effects from DDC

- 31 Ms Holgate explained that in relation to mitigation, the SoCG with DDC (REP1.0.18) sets out that the mitigation measures for the proposed development are agreed between the parties as being acceptable, such that the embedded measures are appropriate and secured by the DCO. Such embedded mitigation measures include careful project design and the reduction of the red line boundary in the North West corner of the Order Limits, which was undertaken post Section 42 consultation stage.
- 32 Ms Holgate made a reference to the Statement of Common Ground and what has been clearly agreed with DDC (REP1-018), particularly in relation the point raised by DDC that concerning the layout of the WTGs and their being spaced closer together. This document confirms it is agreed between the parties that: (a) the embedded mitigation measures for onshore visual impacts are considered to be appropriately secured through the DCO and outline reports; and (b) The Outline Landscape and Ecological Management Plan (Doc. 8.7) is appropriate with regards to landscape management principles.

- 33 Ms Holgate wanted to alert the ExA that there are specific minimum spacing requirements with regard to turbine separation. This is governed by a number of commercial and contractual factors, including wind speeds, close co-location causing reduced functional optimisation and commercial viability. The design and layout of the proposed development was undertaken in consultation with DDC and HE.
- 34 Ms Holgate asked Mr Martin to address the view from Viewpoint 8 (Sandwich Bay, figure 12.34) from Dover District, which is referred to in DDC's LIR as being representative of the likely visual effects.
- 35 Mr Martin confirmed The visual effect of TEOWF on this viewpoint is assessed as significant in Chapter 12 of the ES (PINS Ref APP-053), due to the combination of the medium-high sensitivity and the medium magnitude of change.
- 36 Mr Martin explained that from this viewpoint, Thanet Extension will be visible at distances of approximately 20 km to the north-east, by residents of Sandwich Bay Estate, people visiting Sandwich Flats and walking on the England Coastal Path. The scale and visibility of Thanet Extension are reduced at long distances of approximately 20 km from the viewpoint. The increase in lateral spread on the skyline is also relatively limited, on either side of the existing Thanet Offshore Wind Farm, with the open sea aspect into the Dover Straits and to the Goodwin Sands both being retained.
- 37 In this view, the combination of the assessed sensitivity and magnitude criteria results in an effect which is considered to be near the threshold of significance and a precautionary approach has been taken to its assessment as significant.
- 38 The Applicant understands that DDCs principle concerns are represented in Viewpoint 8 (Sandwich Bay Estate) (Figure 12.34 APP-127) and relate to:
- The northernmost turbines which create a partial enclosure of Sandwich and Pegwell Bay;
 - The southernmost turbines which extend the existing TOWF array southwards towards the Goodwin Sands and may have a 'somewhat removed appearance'.
- 39 Mr Martin explained that the siting and design of TEOWF has incorporated mitigation to reduce these effects. In particular, the north-western extent of the Offshore Wind Farm area was modified, which reduced the lateral extent of TEOWF in this north-western area.

- 40 This design change contributed to reducing the partial enclosure of the open aspects of the Sandwich and Pegwell Bay area and created a larger separation between the coast and the Offshore WTG Array.
- 41 In the view from Viewpoint 8 Sandwich Bay Estate (Figure 12.34 APP-127), there is an area of sea skyline retained between TEOWF and the headland of Thanet, such that TEOWF is clearly 'offshore' and does not appear to be directly 'linked' to the terrestrial landform of Thanet (and thereby enclosing the bay).
- 42 Mr Martin explained that the southerly extension of the WTG Array represents a relatively limited additional lateral spread of WTGs on the sea skyline, such that the wider open sea view across Goodwin Sands and south towards the Dover Straits, remains largely unaffected.

(2) White Cliffs of Dover

- 43 Mr Martin explained that the impact on views from the White Cliffs of Dover was considered in the viewpoints from St Margaret's at Cliffe (VP10) and Dover Castle (Viewpoint 24). The view from St Margaret's at Cliffe (VP10) shows how Thanet Extension aligns with the operational wind farm and is located some 29.5 km distant from this viewpoint on the cliffs of Dover District. The magnitude of change was assessed as being of low magnitude therefore the effects assessed as not significant on views White Cliffs.
- 44 The ExA explained that they have inspected this view in December, but the visibility was very poor and they would like to go back to that view. Mr Martin explained it in the Applicant's impact assessment, they have assumed excellent visibility conditions and taken photographs in such visibility, however at this long distance there often isn't actually any visibility due to the prevailing weather/visibility conditions limiting the view.
- 45 The SLVIA (ES Volume 2 Chapter 12, Doc Ref APP-053) recognises that the Offshore WTG Array will be visible from and have effects on views from more distant parts of Dover District, including for example St Margaret's at Cliffe (Viewpoint 10) (Figure 29.36 APP-127) and Dover Castle (Viewpoint 24) (Figure 12.50 APP-127).
- 46 The assessment found that Thanet Extension will not have potential to lead to a significant effect on views from St Margaret's at Cliffe (Viewpoint 10) at 29.5km or Dover Castle 34.7km (Viewpoint 24), due to the low magnitude of change arising from TEOWF at such long distances, in the presence of the distant TOWF influence and only during infrequent periods of excellent visibility.

47 ***The ExA explained that they didn't see a specifically produced visualisation of a view from an offshore location of the White Cliffs with the Thanet Extension as a component and asked if the Applicant considered the need to do that.***

48 Mr Martin explained that they agreed during the consultations with DDC and other Interested Parties, that there was no specific need for an offshore view looking back at the coast. Mr Martin did however point to the wireline view taken from the Goodwin Sands (Viewpoint 25), with reference to Figure 12.51a-c, which shows a view from an offshore location at Trinity Beacon at the Goodwin Sands, showing the appearance of Thanet Extension, looking back towards the coastline. The White Cliffs appear at the left-hand side of the view in Figure 12.51b, where it is evident that Thanet Extension appears in a different part of the panorama to the north, and does not appear in the immediate setting of the White Cliffs which are visible to south.

49 The ExA emphasised the importance of the view of the iconic White Cliffs as the first view of the UK for people who come to the country for the first time coming on a boat and also for people who see it every day. The ExA suggested that a visualisation from an offshore position of the White Cliffs of Dover is needed.

The ExA explained that from reading DDC'S representation, he got the sense that this issue was important to them as well and asked if this was the case.

50 DDC explained that this wasn't actually their intention to raise concerns with views of the White Cliffs from an offshore position, but that their LIR refers to distant views from onshore areas on the White Cliffs. DDC considered that in terms of views from the ferry, people wouldn't necessarily see the proposed development.

(3) Envelope approach

51 Ms Holgate explained that all projects must be considered on a case by case basis and that they must be judged upon their impacts in their own right. Nonetheless, to cite another example of a project with an "envelope" approach, Kentish Flats Extension is has a layout that partially envelops the original Kentish Flats Wind Farm. The extension wraps around the southern side of Kentish Flats, with larger turbines located close to the north Kent coast.

52 The Applicant considers that the layout of Thanet Extension, forming an envelope around the existing Thanet Offshore Wind Farm is robust, carefully designed, acceptable in planning terms and that there is no particular novelty in this approach of which the ExA should be concerned.

- 53 The Planning Statement at paragraph 7.14 explained how the Applicant complied with the relevant policy requirements relating to good design and form. Mrs Holgate explained that the project has achieved common ground in all areas with DDC and there are very few outstanding issues with DDC, TDC, HE and other parties. The project has been through consultations with stakeholders and they have not raised specific concerns about the proposed development enveloping the existing Thanet Offshore Wind Farm. For a project this close to shore, this in itself demonstrates that much has been undertaken and done when considering layout, design and proactive consultation with all interested stakeholders. When one therefore looks at the Planning Statement and SoCGs as a whole, this shows to the ExA acceptability relating to the proposed development.
- 54 Mr Martin explained that enveloping of the Thanet operational wind farm, where the existing wind farm is contained inside Thanet Extension, does result in visual effects that are distinct to this project. There was a design challenge to integrate the larger turbines with the existing smaller scale turbines, but the Applicant has achieved a good design.
- 55 This is not unusual to Thanet Extension, but is also indicative of a design challenge more widely for wind energy development, of integrating current larger scale commercial wind turbine models with smaller operational wind turbines, in a way that does not give rise to adverse visual effects through marked inconsistencies in appearance.
- 56 The scale comparison between the existing TOWF WTGs and the larger WTGs of Thanet Extension, sited at closer proximity and in front of TOWF (as well as to the side and behind TOWF) is likely to give rise to some notable differences in turbine scale in views from the closest parts of the coast. The proposed development is, however, formed of elements (3-bladed wind turbines) that are fundamentally similar in design to the turbines already present in these views, which means it relates to the visual image already being expressed, has unity in appearance and avoids having an overly complex image.
- 57 Achieving a 'consistency of image' between windfarm developments in the same locality should not, in the Applicant's opinion, be applied too literally or strictly, so as to require all subsequent windfarms to appear as the same size and scale of existing windfarms in the landscape.

- 58 There are already acceptable contrasts in wind farm sizes between the different wind farms in the Thames Estuary, for example, and other examples of offshore wind farms where larger scale turbines appear closer to the coast – such as at Kentish Flats. In this case, Kentish Flats Extension has larger turbines (140m blade tip) closer to the coast that envelop the southern side of the original Kentish Flats wind farm (115m blade tip) and appear larger in views from the north Kent coast.
- 59 It is considered that a degree of variation between windfarm shape and size are acceptable in a seascape, under a broadly consistent windfarm image.
- 60 The position of Thanet Extension enveloping TOWF means that they are almost always viewed in combination with most of Thanet Extension viewed within the visual envelope of TOWF on the sea skyline.
- 61 Mr Martin noted that while the 'legibility' of the original TOWF may be affected by the presence of Thanet Extension turbines to the fore, this actually ensures that the wider lateral spread of wind turbines on the sea skyline is minimised since the turbines are concentrated around the existing wind farm influence.
- 62 The applicant considers that TEOWF forms a relatively small lateral extension to the north and south of TOWF and would maintain sufficient 'open horizon' between TOWF and other offshore wind farms, such as London Array, to prevent coalescence and maintain the seascape 'with wind farms' identity in views.
- 63 In terms of cumulative effects, Mr Martin explained that TEOWF would not result in the key characteristics of the area being affected to such a degree that it would become a 'wind farm seascape' (in addition to other operational wind farms), and that it will remain characterised as a 'seascape with wind farms'. This is an important distinction as it implies that the carrying capacity - as defined by its inherent character - would not be exceeded by Thanet Extension.
- 64 The Applicant considers that the seascape has capacity to accommodate the proposed changes, especially given that appropriate steps are being taken in terms of siting, layout and design of TEOWF.
- 65 ***The ExA made reference to Kentish Flats Extension and requested for the archived documents to be surfaced so the ExA can check what was consented there.***

3 Agenda Item 3 – Effects on the Historic Environment

- 66 **SB started with the offshore effects on historic environment at sea and asked the Applicant to talk the ExA through the process.**
- 67 Ms Holgate asked EM to speak about the offshore remits of the development, specifically the status of the proposed mitigation as detailed in the WSI.
- 68 EM explained that the offshore WSI (Written Scheme of Investigations) is a draft overarching document, which has developed through different stages of comment with HE. EM explained that there is a WSI for offshore to which site/activity specific methodological documents will refer post consent during the development process and similarly a WSI for onshore, that are being agreed with the relevant stakeholders and that they will be complimentary where they interface. EM explained that discussions were ongoing with HE to get the offshore WSI agreed with the additional aim thereby of being able to agree the SoCG and that these were going well and were advanced.
- 69 **SB asked if the intention is to submit the WSI for D3.**
- 70 JKH confirmed that it is and also added that the Applicant updated the drafts for the offshore and will produce that as well.
- 71 **The ExA asked for the Applicant to summarise the position relating to the onshore written scheme of investigation**
- 72 Ms Holgate explained that there is a draft onshore WSI that has been produced and will be submitted for Deadline 3.
- 73 Ms Holgate explained that what has been submitted into the public domain to date has been an onshore written scheme of investigation relating specifically to the site investigation works that are proposed to take place at the landfill area onshore. This document is at an advanced stage and is being negotiated with HE.
- 74 In response to a query raised by Historic England as to methods of trenching and the utilisation of horizontal directional drilling, Ms Holgate confirmed that both HDD and trenching in the intertidal area is still within the project envelope and contained within the draft Order Schedule One, following the removal of Option 2. Ms Holgate further explained that there are specific requirements that have to be complied with around the landfall area in order to ensure that all possible impacts are minimised.

- 75 Ms Holgate further clarified, regarding the relationship between the onshore and offshore WSIs, the Applicant will ensure that the overlap between the onshore and offshore WSIs will be addressed; that this already exists to a degree in the offshore WSI but the Applicant will add additional wording to Ensure this is addressed, for D3.
- 76 In response to a request by SB to consider the assessment undertaken of the the impact of the proposed development on the setting of Reculver Fort, the Roman Towers and Amphitheatre in Ramsgate, Ms Holgate confirmed that the Applicant would review the Environmental Statement and provide the necessary references to where this assessment had been undertaken.

4 Agenda Item 4 - Review of issues and actions arising

77 Actions as received are addressed in the relevant response to ISH Actions document.