

# **Vattenfall Wind Power Ltd**

## **Thanet Extension Offshore Wind Farm**

Appendix 30 to Deadline 3 Submission:  
Statement of Common Ground – Thanet District  
Council

Relevant Examination Deadline: 3


Submitted by Vattenfall Wind Power Ltd


Date: March 2019

Revision B

Date	Issue No.	Remarks / Reason for Issue	Author	Checked	Approved
15/11/2018	01	Draft for review	GoBe	GoBe	VWPL
14/01/2019	02	Received draft from TDC	IL	TDC	VWPL
15/01/2019	A	Original document submitted to the ExA	GoBe	GoBe	VWPL
13/02/19	03	Revised draft submitted to TDC	GoBe	GoBe	VWPL
22/02/2019	04	Revised draft received from TDC	IL	TDC	VWPL
05/03/19	B	Revised document submitted to the ExA	GoBe	GoBe	VWPL

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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 Thanet District Council (TDC) 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 TDC 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 (ExA) 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 TDC, the SoCG is focused on those issues raised by TDC 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: Thanet District 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.
- 8 The key offshore components of Thanet Extension are likely to include:
- Up to 34 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 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 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) (PINS Ref APP-042/ Application Ref 6.2.1) and Volume 3, Chapter 1: Project Description (Onshore) (PINS Ref APP-057/ Application Ref 6.3.1) of the Environmental Statement (ES).

## **2 Thanet District Council's Remit**

- 12 Thanet District Council (TDC) 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.
- 13 TDC is one of the local planning authorities within whose area the project is located.
- 14 In relation to Thanet Extension its responsibilities include engagement in the pre-application process, production of a Local Impact Report (LIR) during the Examination phase (submitted in Deadline 1 as PINS Ref REP1-128) and being consulted on the discharge of onshore requirements for some onshore elements of the works.



### 3 Consultation

#### 3.1 Application elements under Thanet District Councils remit

- 15 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 TDC.
- 16 Thanet District Council is the local government body for the Thanet District within the county of Kent.
- 17 The technical components of the DCO application of relevance to TDC (and therefore considered within this SoCG) comprise:
- Volume 1, Chapter 4: Site Selection and Alternatives (PINS Ref APP-040/ Application Ref 6.1.4);
  - Volume 2, Chapter 10: Shipping and Navigation (PINS Ref APP-051/ Application Ref 6.2.10);
  - Volume 3, Chapter 1: Project Description (Onshore) (PINS Ref APP-057/ Application Ref 6.3.1);
  - Volume 3, Chapter 2: Onshore Landscape and Visual Impact Assessment (PINS Ref APP-058/ Application Ref 6.3.2);
  - Volume 3, Chapter 3: Socio-economics (PINS Ref APP-059/ Application Ref 6.3.3);
  - Volume 3, Chapter 4: Tourism and Recreation (PINS Ref APP-060/ Application Ref 6.3.4);
  - Volume 3, Chapter 5: Onshore Biodiversity (PINS Ref APP-061/ Application Ref 6.3.5);
  - Volume 3, Chapter 6: Ground Conditions, Flood Risk, Land Use (PINS Ref APP-062/ Application Ref 6.3.6);
  - Volume 3, Chapter 7: Historic Environment (PINS Ref APP-063/ Application Ref 6.3.7);
  - Volume 3, Chapter 8: Traffic and Access (PINS Ref APP-064/ Application Ref 6.3.8);

- Volume 3, Chapter 9: Air Quality (PINS Ref APP-065/ Application Ref 6.3.9); and
- Volume 3, Chapter 10: Noise and Vibration (PINS Ref APP-066/ Application Ref 6.3.10).

## 3.2 Consultation Summary

18 This section briefly summarises the consultation that VWPL has undertaken with TDC. 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 TDC pre-application**

Date & Type:	Detail:
2017 Ecological Review Panel	Onshore Archaeology Panel
2017 Ecological Review Panel	Ground Conditions, Hydrology & Flood Risk and Land Use
2017 Ecological Review Panel	Human Environment Panel
2017 Ecological Review Panel	Landscape and Visual Panel
January 2018, S42 Consultation	Comments relating to the Preliminary Environmental Information Report

## 3.3 Post-application Consultation

19 VWPL has engaged with TDC since the Thanet Extension development was accepted for examination by the Planning Inspectorate on 27<sup>th</sup> July 2018. A summary of the post-application consultation with TDC is detailed in Table 2.

**Table 2: Consultation undertaken with TDC post-application**

Date/ Type:	Detail:
24 <sup>th</sup> August 2018	Meeting to discuss TDC’s relevant representation and the form of the Statement of Common Ground
19 <sup>th</sup> December 2018	Meeting to discuss the historic landfill below the Pegwell Bay Country Park and the mitigation measures secured within the Application

## **4 Agreements Log**

- 20 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 2.1). 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 Alternatives**

- 21 The Project has analysed and evaluated a range of options regarding location of infrastructure. The reasons for the selection of the proposed site are duly considered within Volume 1, Chapter 4: Site Selection and Alternatives (PINS Ref APP-040/ Application Ref 6.1.4). 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)	TDC Position	Final Position
Landfall locations	The application provides adequate justification for the choice of landfall and adequately considers all reasonable alternatives.	Agreed	Agreed
Onward cable route	The application provides adequate justification for the choice of onward cable route and adequately considers all reasonable alternatives.	Agreed	Agreed

## **4.2 Shipping and Navigation**

- 22 The Project has the potential to impact upon shipping and navigation. These interactions are duly considered within Volume 2, Chapter 10 of the Thanet Extension ES (PINS Ref APP-051/ Application Ref 6.2.10). Noting that the project has undertaken extensive consultation with the relevant maritime safety and marine fisheries interests. Table 4 identifies the status of discussions relating to shipping and navigation insofar as TDC have requested information during formal consultation.

**Table 4: Status of discussions relating to Shipping and Navigation and Commercial Fisheries.**

Discussion Point	Thanet Extension Position (it is agreed that)	TDC Position	Final Position
Export cable route	The assessment adequately addresses concerns raised about the Harbour limits	Agreed	Agreed
NE Spit pilotage	Impacts of pilotage have been thoroughly and appropriately assessed as part of the NRA.	Agreed	Agreed
Cable route impacts	The evidence within the ES demonstrates that consultation has taken place with the relevant commercial fishing, shipping and navigation, and recreational interests.	Agreed	Agreed



### **4.3 Seascape and Landscape Visual Impact Assessment(s)**

- 23 The Project has the potential to impact upon the landscape and seascape. These interactions are duly considered within Volume 3, Chapter 2 and Volume 2, Chapter 12 of the Thanet Extension ES (PINS Ref APP-058 and APP-053/ Application Refs 6.3.2 and 6.2.12 respectively). Table 5 identifies the status of discussions relating to this topic area between the parties.

**Table 5: Status of discussions relating to Seascape and Landscape and Visual Impact Assessment.**

Discussion Point	Thanet Extension Position (It is agreed that)	TDC Position	Final Position
Adequacy of characterisation data	The receiving environment has been adequately characterised and appropriately described.	Agreed	Agreed
Adequacy of assessment methodology	The methods of assessment for seascape and Landscape VIA are appropriate	Agreed	Agreed
Outcomes of assessment/conclusions	The outcomes of the assessment are appropriate and accurately describe the likely impacts.	Agreed	Agreed
Adequacy of management and/or mitigation measures where appropriate	The proposed management and mitigation as identified within the ES chapter are appropriate	Agreed	Agreed

## 4.4 Tourism and Recreation

- 24 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 (PINS Ref APP-060/ Application Ref 6.3.4). Table 6 identifies the status of discussions relating to this topic area between the parties.

**Table 6: Status of discussions relating to Tourism and Recreation.**

Discussion Point	Thanet Extension Position (it is agreed that)	TDC Position	Final Position
Adequacy of characterisation data	The receiving environment has been adequately characterised and appropriately described.	Agreed	Agreed
Adequacy of assessment methodology	The methods of assessment for considering potential effects on tourism and recreation receptors are appropriate.	Agreed	Agreed
Outcomes of assessment/conclusions	The outcomes of the assessment are appropriate and accurately describe the likely impacts.	Agreed	Agreed
Adequacy of management and/or mitigation measures where appropriate	The proposed management and mitigation as identified within the tourism and recreation ES chapter are appropriate	Agreed	Agreed

#### **4.5 Ground Conditions, Flood Risk and Land Use**

- 25 The Project has the potential to impact upon ground conditions. These interactions are duly considered within Volume 3, Chapter 6 of the Thanet Extension ES (PINS Ref APP-062/ Application Ref 6.3.6). Table 7 identifies the status of discussions relating to this topic area between the parties.

**Table 7: Status of discussions relating to Ground Conditions, Flood Risk and Land Use.**

Discussion Point	Thanet Extension Position	TDC Position	Final Position
Policy and plans	The relevant plans, policy and legislation have been referred to when considering potential effects on ground conditions, flood risk and land use	Agreed	Agreed
Adequacy of characterisation data	<p>The receiving environment has been adequately characterised and appropriately described.</p> <p>The Applicant provided additional clarification on the data and information used to characterise the environment within the Pegwell Bay Country Park.</p>	Agreed subject to contemporary intrusive investigation being required under Requirement 19.	Agreed
Outcomes of assessment/conclusions	The outcomes of the assessment are appropriate and accurately describe the likely impacts.	Agreed subject to contemporary intrusive investigation being required under Requirement 19	Agreed

Discussion Point	Thanet Extension Position	TDC Position	Final Position
<p>Adequacy of management and/or mitigation measures where appropriate</p>	<p>The proposed management and mitigation as identified within the ES chapter are appropriate</p> <p>As clarified by the Applicant in the teleconference held with TDC, the proposed management and mitigation measures, including a Contaminated Groundwater and Land Plan, have been adequately secured within the draft DCO. Furthermore, these plans will require the relevant authorities, including TDC, to approve the final plans following the detailed design phase/ post-consent (if granted).</p>	<p>Agreed subject to contemporary intrusive investigation being required under Requirement 19 to inform the management and mitigation measures</p>	<p>Agreed</p>

## **4.6 Onshore Historic Environment**

- 26 The Project has the potential to impact upon the historic environment. These interactions are duly considered within Volume 3, Chapter 7 of the Thanet Extension ES (PINS Ref APP-063/ Application Ref 6.3.7). Table 8 identifies the status of discussions relating to this topic area between the parties. It is noted that in general terms, and as captured within the Council’s relevant representation TDC will defer to other agencies with regards archaeology. The following section therefore refers primarily to historic environment as applicable to TDCs interests rather than archaeology.



**Table 8: Status of discussions relating to Onshore Historic Environment.**

Discussion Point	Thanet Extension Position (it is agreed that)	TDC Position	Final Position
Policy and plans	The relevant plans, policy and legislation have been referred to when considering potential effects on historic environment.	Agreed	Agreed
Adequacy of characterisation data	The receiving environment has been adequately characterised and appropriately described.	Agreed	Agreed
Adequacy of assessment methodology	The assessment methodology for consideration of indirect and direct effects on historic environment are considered appropriate.	Agreed	Agreed
Outcomes of assessment/conclusions	The outcomes of the assessment are appropriate and accurately describe the likely impacts.	Agreed	Agreed

Discussion Point	Thanet Extension Position (it is agreed that)	TDC 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	Agreed	Agreed

#### **4.7 Air Quality**

- 27 The Project has the potential to impact upon air quality. These interactions are duly considered within Volume 3, Chapter 9 of the Thanet Extension ES (PINS Ref APP-065/ Application Ref 6.3.9). Table 9 identifies the status of discussions relating to this topic area between the parties.

**Table 9: Status of discussions relating to Air Quality.**

Discussion Point	Thanet Extension Position (it is agreed that)	TDC Position	Final Position
Policy and plans	The relevant plans, policy and legislation have been referred to when considering potential effects on air quality	Agreed	Agreed
Adequacy of characterisation data	The receiving environment has been adequately characterised and appropriately described.	Agreed	Agreed
Adequacy of assessment methodology	The assessment methodology for consideration of effects on air quality is considered appropriate.	Agreed	Agreed
Outcomes of assessment/conclusions	The outcomes of the assessment are appropriate and accurately describe the likely impacts.	Agreed	Agreed
Adequacy of management and/or mitigation measures	The proposed management and mitigation as identified within the ES chapter are appropriate and the relevant Construction	Agreed	Agreed

Discussion Point	Thanet Extension Position (it is agreed that)	TDC Position	Final Position
where appropriate	Environmental Management Plan principles have been provided within the Code of Construction Practice.		

## **4.8 Noise and Vibration**

- 28 The Project has the potential to impact upon due to noise. These interactions are duly considered within Volume 3, Chapter 10 of the Thanet Extension ES (PINS Ref APP-066/ Application Ref 6.3.10). Table 10 identifies the status of discussions relating to this topic area between the parties.

**Table 10: Status of discussions relating to Noise and Vibration.**

Discussion Point	Thanet Extension Position (it is agreed that)	TDC Position	Final Position
Policy and plans	The relevant plans, policy and legislation have been referred to when considering potential effects from impacts from noise and vibrations associated with the project.	Agreed	Agreed
Adequacy of characterisation data	The receiving environment has been adequately characterised and appropriately described.	Agreed	Agreed
Adequacy of assessment methodology	The assessment methodology for consideration of effects from impacts from noise and vibrations associated with the project is considered appropriate.	Agreed.	Agreed
Outcomes of assessment/conclusions	The outcomes of the assessment are appropriate and accurately describe the likely impacts.	Agreed	Agreed

Discussion Point	Thanet Extension Position (it is agreed that)	TDC 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 and the relevant Construction Environmental Management Plan principles (with regards noise and vibration management) have been provided within the Code of Construction Practice.	Agreed.	Agreed



## **5 Matters under discussion**

- 29 This section identifies those matters raised by TDC 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 TDC. It is noted that within TDC's relevant representation TDC state:

*The Council does not object to the development on the issues raised above, however believes that these matters should be carefully considered by the Examining Authority. In particular, the Council raises concern at this stage over the short-term construction and long-term operational impacts from noise from the substation at night on residential receptors in Ebbsfleet, and the potential impacts from contaminant releases at the landfill site during the construction phase.*

- 30 No further matters are to be discussed other than those outlined in Table 7 above.