

# **Vattenfall Wind Power Ltd**

## **Thanet Extension Offshore Wind Farm**

Appendix 36 to Deadline 3 Submission:  
Environmental Statement Addendum, Onshore  
Heritage

Relevant Examination Deadline: 3

Submitted by Vattenfall Wind Power Ltd

Date: March 2019

Revision A

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Date of Approval:	March 2019
Revision:	A

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

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# THANET EXTENSION ONSHORE WIND FARM

Environmental Statement Addendum,  
Onshore Heritage

Report Ref.: 116083.03  
March 2019



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## Document Information

Document title	Thanet Extension Onshore Wind Farm
Document subtitle	Environmental Statement Addendum Onshore Cultural Heritage
Document reference	116083.03
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### Quality Assurance

Issue & issue date	Status	Author	Approved by
1 04/03/2019	Internal Draft	MDT	



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## Appendix A – Record of Joint Site Visit with Historic England



## CHAPTER 7 ONSHORE CULTURAL HERITAGE

### 1 INTRODUCTION

#### 1.1 Background

This Addendum supplements the Environmental Statement, Volume 3, Chapter 7 *Onshore Historic Environment* which dealt with potential effects to the significance of onshore heritage assets as a result of the proposed Thanet Extension Offshore Windfarm (TEOW). The Environmental Statement (ES) was submitted with the Application.

Specifically, this Addendum sets out a reconsideration of potential effects on the significance of Margate Seafront Conservation Area, following consultation with Historic England post-submission of the Application and after a joint site-visit carried out in December 2018.

#### 1.2 Methodology

The assessment presented in this Addendum is the same as that presented in Chapter 7 of the ES, (specifically Section 7.4 Scope and Methodology and Section 7.5 Assessment Criteria and Assignment of Significance) and should be read in conjunction with that document. It is noted that the methodology has been broadly accepted as fit for purpose by Historic England in the Statement of Common Ground prepared following the submission of the Application.

#### 1.3 Consultation

Preliminary consultation carried out with Historic England prior to submission of the ES indicated a need to consider potential effects on the Conservation Areas at Margate (amongst other assets). This was undertaken and presented in the ES. The Assessment presented in Section 7.12 (paragraphs 7.12.154 and following) concluded that there was no effect on the significance of the Conservation Area, nor the designation assets within it.

Following submission, Historic England expressed some concern over the level of impact assessed at Margate, with specific reference to the views over Margate from the west (looking east), as the proposed turbines breached the existing roofline over the town. It was agreed to carry out a joint site visit to review the assessment. A number of viewpoints were selected and visited and the submitted Visualisations were used to gauge the degree to which the Proposed Development might be visible and to inform discussion of potential effects on significance of the assets concerned. A record of that site visit was prepared and sent to Historic England for review and is appended to this Assessment.

#### 1.4 Assessment

The Margate Seafront Conservation Area is considered to be of Medium heritage significance and the associated Grade II listed buildings are considered to be of High heritage significance for architectural and historic interest and through their association with the mid-19th to late-20th century fashion for day trips and holidays to seaside resorts.

The Margate Conservation Area as a whole has a diverse feel with what appears to be a number of different character areas including the green spaces to the east, the old town, harbour and the beachside elements. Views of and from the majority of this conservation area in relation to Thanet Extension Wind Turbine Generators (WTGs) are screened by further structures and most of the individual designated assets contained within do not have views looking towards Thanet Extension WTGs. The exceptions to this have been included within the asset group and consist of Grade II listed structures within the north-eastern extent of the designated area together with the Former 'Man of Kent' Temperance Hotel (NHLE 1395803) which looks out across the conservation area from the



upper floors. Views out of the area to the west of the Stone Pier (NHLE 1260334) are largely screened by this structure and the neighbouring buildings and Thanet Extension WTGs are not expected to impact upon the beachside area of the conservation area. From the eastern extent of the designated area that is the focal point of this assessment, views out to sea make an important contribution to the setting of the asset group and add to its heritage significance.

Indirect effects upon the Margate Conservation Area and selected Grade II listed buildings are considered in relation to Thanet Extension WTGs alone. Other elements of Thanet Extension would not be visible in views of or from the conservation area and would not contribute to any change to setting.

#### 1.4.1 Assessment of construction phase

Indirect effects on the heritage significance of the Margate Conservation Area asset group as a result of visibility of the WTGs construction over and above those presented by the completed array would be temporary and short-lived and as such would lead to a Negligible magnitude of change the effect of which would be Not Significant in terms of the EIA Regulations.

#### 1.4.2 Assessment of O&M phase

The proposed WTGs would not be visible in views from within the majority of the conservation area or the majority of the listed buildings within it as views would be precluded by intervening buildings. Thanet Extension WTGs would appear in views across the eastern extent of the conservation area in views looking out across the green spaces on the clifftop at Fort Parade which form contributing elements to the architectural interest of the assets and allow the historic development of the town and its associations with past leisure activities to be appreciated. WTGs would potentially appear as peripheral elements within views to sea from some listed buildings, such as Paragon Court (NHLE 1088960). WTGs would be visible in views of Paragon Court from the west, although viewpoints from where simultaneous views are available are all close to the asset and the relative prominence of the WTGs would be reduced. The closest WTGs would be situated c. 10.5 km from the designated area. Views available from the conservation area are mainly along the clifftop to the east of the harbour where WTGs would appear as distant features on the sea horizon leading out from the clifftop on which the conservation area is located. In these views, the closest WTGs visible would be located further from the viewer than in the layout considered at PEIR as a result of the change to the offshore Red Line Boundary, consequently appearing with discernibly reduced prominence.

Thanet Extension WTGs would also appear in views from the Stone Pier (NHLE 1260334) looking towards the east across the more modern elements of the shorefront at the Rendezvous which are not included within the conservation area (Figure 12.29, Volume 2, Chapter 12: Seascape, Landscape and Visual Impact Assessment (Document Ref: 6.2.12)). Views of Thanet Extension from within the wider area would be very limited with the exception of possible views available from the upper floors of the Former 'Man of Kent' Temperance Hotel (NHLE 1395803) which stands significantly taller than the surrounding structures and has windows looking out in the direction of Thanet Extension WTGs. WTGs would be perceived as distant features within a much wider panorama beyond the intervening townscape in views from these upper storeys.

WTGs may be visible beyond Margate in some longer views from the west, around Westgate on Sea (Figures 12.28 and 12.41 in Volume 2, Chapter 12: Seascape, Landscape and Visual Impact Assessment (Document Ref: 6.2.12)). In these views, some of the proposed WTGs would be visible behind the town, although the majority of the array would be visible to seaward. Whilst the skyline of Margate does contain a few taller structures and more modern elements are visible, the turbine blades would introduce a more obviously modern industrial and mobile element in views towards the town from the west. The principal contributions of these views to architectural and historic interest

derives from the visible relationship of buildings along the eastern side of Margate Bay with the harbour, and the juxtaposition of individual buildings at different levels along the seafront to the east side of Margate Bay, although in views from the west in which the WTGs would also appear, the distance of the viewer from these buildings is such that the contribution of these views to the significance of the conservation area is limited. Margate, in common with many seafront towns, does not have a particularly distinctive skyline, with relatively few taller buildings, which include Arlington House, which is visually the most prominent tall building in these views, the spire of St John's Church and the Ferris Wheel at Dreamland as well as the towers of the churches of Saints Michael and Bishoy and Saint Paul, none of which are located within the conservation area assessed here. These taller buildings punctuate the skyline in front of and behind the conservation area, providing a sense of the relationship of the seafront conservation area to a wider settlement, which would be little affected by the visibility of the proposed WTGs.

In these views from the west of the conservation area, the amended offshore Red Line Boundary and WTG layout would mean WTGs visible to the north of Margate would appear further from the viewer and would be more coherently grouped (than was the case with the layout presented at PEIR). This would present a slightly reduced magnitude of change in setting to the array considered at PEIR.

The presence of the existing TOWF and other wind farm arrays in views available from or including the Conservation Area at Margate means that the Thanet Extension WTGs would not be incongruous to the current setting. The addition of Thanet Extension WTGs to TOWF, however, would increase the field of view occupied by WTGs and present differences in the scale of WTGs between proposed and existing arrays, by disrupting of the existing grid pattern, and introducing stacking and overlapping of WTGs.

The London Array, KF, KFE, GS, GSE and GSD OWFs would all be visible from the conservation area, with London Array, GS, GSE and GSD potentially appearing in the same field of view as TOWF and Thanet Extension. Where the wind farms would appear in the same views the existing contrast in heights and composition due to the distances of each development and as such would provide a more forgiving setting for the addition of the proposed WTGs to TOWF.

Should the existing TOWF be decommissioned at the end of its use Thanet Extension would provide a more dispersed composition would present a more harmonized appearance.

Margate harbour is used primarily by relatively small craft, comprising fishing and pleasure boats. These craft primarily travel close to the coast, and the proposed wind farm would not intervene in views of the conservation area from the majority of marine traffic accessing the harbour. Larger vessels travel through the area further from the shore but views available from these assets in which Thanet Extension WTGs could intervene would be from a distance of over 15 km, at which separation it would be difficult to discern the location of the conservation area. Consequently, visibility of Thanet Extension WTGs in views from the sea would not contribute to any adverse effect on the Margate Conservation Area.

The increased scale of Thanet Extension WTGs would mean that they would be visible over land in some views of towards the Conservation Area from its west, such as from West Brook (see Figure 12.28 (Volume 2, Chapter 12: Seascape, Landscape and Visual Impact Assessment (Document Ref: 6.2.12)). However, the special interest in the area and in the individual listed assets that contribute to its significance is not readily apparent at this range. Nevertheless, the WTGs blade tips appear above or at a similar height to the roofline of the town in this view and some turbine blades can be seen cutting across the roofline behind the town, introducing a new more modern industrial and mobile element. It is considered that the visibility of these turbines may cause some confusion as the landform may mean they are not necessarily understood as part of the TEOW scheme. In any case



there is a sense of the offshore scheme being seen to transition onshore, and this may be perceived as changing the way in which the conservation area is seen, appreciated and understood.

The change to the Red Line boundary (and WTG layout) from that presented in the PEIR would result in a smaller change to the setting of the Margate Conservation Area than the layouts considered at PEIR.

However, the special interest in and character an appearance of the Margate Conservation Area is considered to be affected by the minor change in setting that the Thanet Extension WTGs represent, where these are visible above the area in long views towards the town from the west, or in views along the coast from the eastern edge of the area (the effect on the Clifftop conservation area is assessed elsewhere in this Chapter). As noted above, the effect is specifically related to the sense in which the offshore scheme can be perceived to be coming onshore, and behind the town, as well as deriving from the introduction of modern, industrial and mobile elements above the historic skyline of the town (and conservation area). It is noted that this effect reduces as the viewer gets closer to Margate, as the WTGs will increasingly be hidden behind the town centre.

As a result, the contribution that setting of Margate makes to the significance of the conservation area is considered to be reduced to a minor degree (an effect of “low” magnitude, and the significance of the conservation area (in respect of its character and appearance) is assessed to suffer an effect of Minor significance. An effect of **Minor** significance is not considered significant for purposes of the EIA Regulations. Whilst this is considered to be “harm”, the degree of harm is certainly less than substantial.

### 1.5 Summary of Effects

The summary of Effects table presented as Table 7.15 of the original ES should be amended, with the following entry added.

Change in the Setting causing a reduction in the contribution of that setting to the asset, such that the asset loses significance: Margate Seafront	Potential Minor effect: not a significant effect.	No mitigation is proposed.	Potential Minor effect: Not significant
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### 1.6 Conclusion

This Addendum presents a reappraisal of the potential effect of the Proposed Development upon the heritage significance of the Margate Seafront Conservation Area, following consideration of consultation responses from Historic England.

After a joint site visit to Viewpoint 28 west of Margate, the assessor has considered the views of Historic England in respect of the view of the WTG blades over the skyline, and the way in which the WTGs could appear to be onshore (and behind the town) rather than clearly part of the greater onshore scheme. The assessor concludes that the change to the skyline through the introduction of mobile and more modern industrial scale features, as well as the confusion between the onshore and offshore nature of the Development (in view from the west) does cause a small reduction in the heritage significance of Margate Conservation Area, and in how that significance is understood and appreciated. This effect is consistent with the assessments presented in the ES in respect of the Broadstairs and Margate Clifftop conservation areas, where the same effect is recognised and (amongst other things) is considered to lead to an effect of minor significance.



Nevertheless, the effect with respect to Margate is considered to be “low” in magnitude and largely restricted to views from the west and is consequently assessed as **minor** in significance and not significant for EIA regulations.



Meeting Notes – Site Visit with HE to discuss assessments.



## TEOW Site Visit/Meeting Record 5<sup>th</sup> December 2018

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

Item	Details	Lead	Actions
<b>Apologies</b>	N/A		
<b>Previous meeting notes &amp; update on actions</b>	N/A		
<b>H&amp;S</b>	N/A		
<b>Accompanied Visit to Selected Viewpoints</b>	<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>		
<b>Viewpoint 2 West Brook</b>	<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>		