

Vattenfall Wind Power Ltd

Thanet Extension Offshore Wind Farm

Appendix 19 to Deadline 3 Submission:
Statement

of Common Ground – Dover District Council

Relevant Examination Deadline: 3

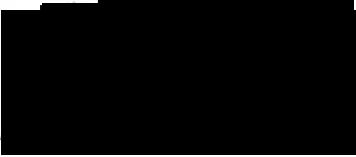
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1 Introduction

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 Dover District Council (DDC) 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 DDC 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) 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 DDC, the SoCG is focused on those issues raised by DDC in its response to the Section 42 consultation that has underpinned the pre-application consultation between the parties.
- 5 The structure of the SoCG is as follows:
 - Section 1: Introduction;
 - Section 2: Dover District Council's Remit;
 - Section 3: Consultation;
 - Section 4: Agreements Log; and
 - Section 5: Summary.

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 are proposed to 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 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 Highest Astronomical Tide (HAT) a maximum diameter of 220 m and a minimum 22 m clearance between the Mean High Water Springs 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 The key features of the development within the district of Dover are:

- Underground cables to the onshore substation and associated works including new and upgraded highways accesses (works 7-11);
- A new onshore substation located on the former site of Richborough Port (works 12-15); and
- Underground cables from the onshore substation to the grid connection point at Richborough Energy Park.

12 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 Dover District Council's Remit

- 13 Dover District Council (DDC) 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.
- 14 DDC is one of the local planning authorities within whose area the project is located. The sub-station, Richborough connection and a part of the cable route are within Dover District. DDC also form part of the National Nature Reserve (NNR) Management Steering Group and therefore also has an interest in respect of the impact on the NNR.
- 15 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 REP1-091) and being consulted on the discharge of onshore requirements for some onshore elements of the works.

3 Consultation

3.1 Application elements under Dover District Council's remit

- 16 Work No's. 1 to 16, detailed in Part 1 of Schedule 1 of the draft DCO describe the elements of Thanet Extension which may affect the interests of DDC. Work No's 7-16 include works within DDC administration boundary.
- 17 Dover District Council is the local government body for the Dover District within the County of Kent.
- 18 The technical components of the DCO application of relevance to DDC (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 3, Chapter 2: Landscape and Visual Impact Assessment (PINS Ref APP-058/ Application Ref 6.3.2);
 - 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);
 - Draft DCO (PINS Ref REP2-035 which superseded PINS Ref APP-022/ Application Ref 3.1); and
 - Report to Inform Appropriate Assessment (PINS Refs REP2-018 and REP2-019 which supersedes PINS Ref APP-030/ Application Ref 5.2).

3.2 Consultation Summary

- 19 This section briefly summarises the consultation that VWPL has undertaken with DDC. Engagement during the pre-application phase, both statutory and non-statutory, is summarised in Table 1.

Table 1: Consultation undertaken with Dover District Council pre-application

Date & Type:	Detail:
28 th March 2017 – Evidence Plan Meeting	1 st Evidence Plan Meeting - Historic Environment
11 th July 2017 Evidence Plan Meeting	2 nd Evidence Plan Meeting – General Onshore Meeting
3 rd October 2017 Evidence Plan Meeting	3 rd Evidence Plan Meeting – General Onshore Meeting

3.3 Post-application Consultation

20 VWPL has engaged with DDC 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 DDC is detailed in Table 2.

Table 2: Consultation undertaken with DDC post-application

Date/ Type:	Detail:
31 st October 2018	Meeting following receipt of Relevant Representations
9 th January 2019	Meeting to discuss the SoCG

21 At the meeting on the 31st October 2018 it was agreed that the areas identified within the agreements logs represent those that remain as Dover District Council core themes of concern that they wish to satisfy themselves have been addressed following the Section 42 Consultation. The following matters were agreed as not forming areas of focus for DDC as they consider them adequately addressed and therefore no Statement of Common Ground is required:

- Traffic and Transport;
- Air Quality;
- Noise and Vibration;
- Ground Conditions, Land Use and Flood Risk; and
- Onshore Heritage and Archaeology.

- 22 The core areas that reflect the main focus of DDC are as follows:
- Onshore Ecology;
 - Route Selection:
 - Adequacy of information to inform Appropriate Assessment; and
 - Impacts on National Nature Reserve and Country Park.
 - Landscape and Visual Impact Assessment:
 - Proposed infrastructure; and
 - On-shore cable route.
 - Substation and associated works; and
 - Adequacy of DCO Conditions.

4 Agreements Log

- 23 The following section of this SoCG identifies the level of agreement between the parties for each relevant component of the application (as identified above). 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.
- 24 For ease of reference the core themes are addressed through consideration of the relevant documentation. As such the first section presents the site selection and alternatives chapter in order to ensure DDC concerns regarding adequacy of route selection are addressed. Subsequent sections then address the relevant reports to address concerns with regards onshore ecology (in the general sense), the adequacy of information to inform Appropriate Assessment, landscape and visual impact, effects associated with the cable bund (Option 2) and the substation etc.

4.1 Site Selection and Alternatives

- 25 During formal consultation DDC requested further information with regards the site selection and alternatives process in relation to the cable route. The requested updates and provision of further information were included within the final ES chapter (PINS Ref APP-040/ Application Ref 6.1.4). Table 3 identifies the status of the discussion points relating to this topic area between the parties.

Table 3: Status of discussions relating to the Site Selection and Alternatives.

Discussion Point	Thanet Extension Position	DDC Position	Final Position
Adequacy of information provision	Document 6.1.4 provides a full and detailed account of the considerations and decision making process undertaken to develop the proposed Order Limits.	Chapter 4: Site Selection and Alternatives (Doc 6.1.4) provides a full and comprehensive account of the site selection process and consideration of alternatives. This includes a detailed account of the cable route selection process which has been addressed sufficiently. DDC are therefore satisfied that this process has been adequately addressed.	Agreed
Project optionality	Following the consultation responses received in S42 the larger seawall extension option was removed and Option 1 and 3 were included within the project description subject to the findings of the SI works. Option 1 and 3 are agreed as appropriate.	DDC welcome the removal of the larger seawall extension option and support the inclusion of underground Options 1 & 3. It is considered that Options 1&3 would be the preferred solutions if the finding of SI works enable these to be taken forward. Option 2 would have been considered to have a visual impact on the landscape and would still involve an extension and projection of the seawall. However, this option has now been removed which is welcomed. Previous concerns raised in the S42 consultation and Relevant representation have now been satisfactorily addressed.	Agreed

4.2 Landscape and Visual Impact Assessment

- 26 The Project has the potential to impact upon the landscape within Dover District's jurisdiction. These interactions are duly considered within Volume 3, Chapter 2 of the Thanet Extension ES (PINS Ref APP-058/ Application Ref 6.3.2). Table 4 identifies the status of discussions relating to this topic area between the parties.

Table 4 Status of discussions relating to Landscape and Visual Impact Assessment.

Note: DDC comments relate to both onshore and offshore visual effects, unless stated otherwise

Discussion Point	Thanet Extension Position	DDC Position	Final Position
Policy and Planning	The assessment has identified all appropriate plans and policies relevant to landscape and visual impact assessment and has given due regard to them within the assessment.	It can be confirmed that DDC are satisfied that appropriate plans and policies relevant to the LVIA have been given due regard in the assessment.	Agreed
Consultation	The ES chapter has been adequately updated following S42 and Evidence Plan consultation and concerns raised have been adequately addressed or clarified.	Concerns raised and points raised in the S42 consultation have been adequately clarified. DDC welcome the inclusion of all the viewpoints identified (as necessary) in the S42 consultation response.	Agreed
Scope and Assessment methodology	The potential impacts identified are appropriate and accurate for the relevant receptors.	The potential impacts have now been appropriately identified and are now accurate for the relevant receptors.	Agreed
	The study area defined for the assessment is appropriate for the impacts considered.	The study area defined in the assessment is appropriate for the proposed impacts.	Agreed
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.	DDC can confirm the primary and secondary data characterises the baseline environment for the purposes of informing the EIA.	Agreed

Discussion Point	Thanet Extension Position	DDC Position	Final Position
	The scopes and methodologies undertaken for the viewpoints were adequate for characterising the baseline and informing photomontage drafting.	Additional photomontages and viewpoints have been agreed with DDC and adequately address the matters raised in the S42 consultation process, particularly in relation to the (visual) impact of the substation.	Agreed
	All data gaps have been highlighted and all appropriate measures for filling any data gaps have been proposed.	As identified above all data gaps highlighted in DDC's S42 consultation response have been appropriately addressed in the DCO application.	Agreed
Mitigation Measures	The embedded mitigation measures for onshore visual impacts are considered appropriate and are appropriately secured through the DCO.	The embedded mitigation measures for onshore visual impacts are considered to be appropriately secured through the DCO and outline reports.	Agreed
	The Outline Landscape and Ecological Management Plan (PINS Ref REP1-069 which supersedes PINS Ref APP-142/ Application Ref 8.7) is appropriate with regards landscape management principles.	The Outline Landscape and Ecological Management Plan (Doc. 8.7) is appropriate with regards to landscape management principles.	Agreed
Outcomes of the EIA	The assessment criteria and assignment of significance is appropriate.	DDC largely agree that the assessment criteria and assignment of significance is appropriate in the majority of the identified receptors, however it is considered there is some adverse impact from seascape viewpoints in Dover District.	Agreed with reservations
	The sensitivity and importance of the receiving environment is accurately described within the Environmental Statement.	The sensitivity and importance of the receiving environment are accurately described within the ES.	Agreed

Discussion Point	Thanet Extension Position	DDC Position	Final Position
	The conclusions of the assessment of onshore visual impacts (LVIA) accurately reflect the potential impacts on the receiving environment within the study area.	DDC agree that the findings of the LVIA accurately reflect the potential onshore visual impacts.	Agreed
	The conclusions of the assessment of offshore visual impacts (SLVIA) accurately reflect the potential impacts on the receiving environment within the study area.	DDC are unable to agree to all the conclusions of the assessment and consider the impact to be greater within the receiving environment, with a minor to moderate impact on some viewpoints, however DDC do not currently have the in house expertise available to pursue this opinion further in detail, in respect of the DCO application and are therefore not in a position to counter this view other than general comments	Agreed with reservations
	The cumulative effects have been adequately and appropriately described within the ES and the conclusions are appropriate.	It is agreed that the cumulative effects have been adequately and appropriately described within the ES and the conclusions are appropriate in this regard.	Agreed

4.3 Tourism and Recreation

- 27 The Project has the potential to impact upon tourism and recreation receptors. 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 5 identifies the status of discussions relating to this topic area between the parties.

Table 5 Status of discussions relating to Tourism and Recreation.

Discussion Point	Thanet Extension Position	DDC Position	Final Position
Policy and Planning	The assessment has identified all appropriate plans and policies relevant to tourism and recreation and has given due regard to them within the assessment.	The Tourism and Recreation Baseline Report identified all appropriate policies relevant to tourism and recreation and has given due regard to them.	Agreed
Consultation	The ES chapter has been adequately updated following S42 a consultation and concerns raised have been adequately addressed or clarified.	The ES chapter has been adequately updated following DDC comments in the S42 consultation and all concerns raised have been adequately addressed and/or clarified.	Agreed
Scope and Assessment methodology	The potential impacts identified are appropriate and accurate for tourism and recreation receptors.	DDC can confirm that the potential impacts identified are appropriate and accurate for tourism and recreation receptors.	Agreed
	The study area defined for the assessment is appropriate for the impacts considered.	The study area defined for the assessment is appropriate for the impacts considered.	Agreed
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.	It is agreed that sufficient primary and secondary data has been collated to appropriately characterise the baseline environment for the purposes of informing the EIA.	Agreed
	All data gaps have been highlighted and all appropriate measures for filling any data gaps have been proposed.	It is accepted that all data gaps highlighted have now been filled and have been dealt with appropriately in the EIA.	Agreed

Discussion Point	Thanet Extension Position	DDC Position	Final Position
Mitigation Measures	The embedded mitigation measures are considered appropriate and are appropriately secured through the DCO.	DDC are satisfied that the embedded mitigation measures are considered appropriate and appropriately secured through the DCO.	Agreed
	The access management plan (PINS Ref APP-136/ Application Ref 8.4) is considered appropriate.	The access management plan (doc ref 8.4) is considered appropriate subject to the agreement of the land owners/operators.	Agreed
Outcomes of the EIA	The assessment criteria and assignment of significance is appropriate.	DDC can confirm that the assessment criteria and assignment of significance is appropriate.	Agreed
	The sensitivity and importance of the receiving environment is accurately described within the Environmental Statement.	The sensitivity and importance of the receiving environment is accurately described within the ES.	Agreed
	The conclusions of the assessment accurately reflect the potential impacts on the receiving environment within the study area.	DDC can confirm the conclusions of the assessment accurately reflect the potential impacts on the receiving environment within the study area.	Agreed
	The cumulative effects have been adequately and appropriately described within the ES and the conclusions are appropriate.	The cumulative effects have been adequately and appropriately described within the ES and the conclusions are appropriate.	Agreed

4.4 Onshore biodiversity

- 28 The Project has the potential to impact upon ecological receptors. These interactions are duly considered within Volume 3, Chapter 5: Onshore Biodiversity of the Thanet Extension ES (PINS Ref APP-061/ Application Ref 6.3.5). Table 5 identifies the status of discussions relating to this topic area between the parties.

Table 6 Status of discussions relating to Onshore biodiversity.

Discussion Point	Thanet Extension Position	DDC Position	Final Position
Policy and Planning	The assessment has identified all appropriate plans and policies relevant to onshore ecology and has given due regard to them within the assessment.	The assessment has identified all appropriate plans and policies relevant to onshore ecology and has given due regard to them within the assessment.	Agreed
Consultation	The ES chapter has been adequately updated following S42 and Evidence Plan consultation and concerns raised have been adequately addressed or clarified.	The ES chapter has been adequately updated following DDC’s S42 consultation response and the relevant representation (RR-029), concerns raised have therefore all been adequately addressed and/or clarified.	Agreed
Scope and Assessment methodology	The potential impacts identified are appropriate and accurate for onshore ecology receptors.	The potential impacts identified are appropriate and accurate for onshore ecology receptors.	Agreed
	The study area defined for the assessment is appropriate for the impacts considered.	It can be confirmed the study area defined is appropriate for the impacts to be considered.	Agreed
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.	Sufficient data has been collated to appropriately characterise the baseline environment for the purposes of informing the EIA.	Agreed
	The survey scopes and methodologies undertaken for the ecological surveys were adequate for characterising the baseline.	It can be agreed that the survey scope and methodologies undertaken for the ecological	Agreed

Discussion Point	Thanet Extension Position	DDC Position	Final Position
		survey are adequate for characterising the baseline	
	All data gaps have been highlighted and all appropriate measures for filling any data gaps have been proposed.	It can be confirmed that all data gaps highlighted in the S42 consultation have now been adequately addressed.	Agreed
Mitigation Measures	The embedded mitigation measures are considered appropriate and are appropriately secured through the DCO.	The embedded mitigation measures are considered appropriate and are appropriately secured through the DCO.	Agreed
	The Outline Landscape and Ecological Management Plan (PINS Ref REP1-069 which supersedes PINS Ref APP-142/ Application Ref 8.7) is appropriate.	DDC can confirm from their perspective that the Outline Landscape and Ecological Management Plan (Doc. 8.7) is appropriate, subject to detailed requirements from Natural England and Kent Wildlife Trust.	Agreed
Outcomes of the EIA	The assessment criteria and assignment of significance is appropriate.	The assessment criteria and assignment of significance is considered appropriate.	Agreed
	The sensitivity and importance of the receiving environment is accurately described within the Environmental Statement.	DDC can confirm the sensitivity and importance of the receiving environment is accurately described within the ES.	Agreed
	The conclusions of the assessment accurately reflect the potential impacts on the receiving environment within the study area.	The conclusions of the assessment accurately reflect the potential impacts on the receiving environment within the study area.	Agreed

Discussion Point	Thanet Extension Position	DDC Position	Final Position
	The cumulative effects have been adequately and appropriately described within the ES and the conclusions are appropriate.	From DDC’s perspective the cumulative effects have been adequately and appropriately described within the ES and the conclusions are appropriate.	Agreed

4.5 Draft DCO

- 29 A Draft DCO was included with the application. The DCO contains a number of Requirements and Conditions which relate to the project. Table 5 identifies the status of discussions relating to the draft DCO between the parties.
- 30 The draft DCO has been revised in Deadline 1 to account for DDC's consultation as was submitted as PINS Ref REP1-062. This document has been revised to account primarily for the removal of the Option 2 landfall and was submitted as part of the Applicant's Deadline 2 Submission (PINS Ref REP2-035).

Table 7 Status of discussions relating to draft DCO.

Discussion Point	Thanet Extension Position	DDC Position	Final Position
DCO Requirements	The DCO contains appropriate provisions for the control and management of the proposed development	The DCO contains in most part appropriate provisions for the control and management of the proposed development, however Schedule 10: Procedure for Discharge of Requirements has a number of unrealistic timescales for the validation and consultation of relevant parties resulting in a significant onus of LPA's to process matters immediately. There are also some minor revisions required to the areas referred to in Schedule 4.	Agreed subject to some minor changes
DCO Plans	The draft Code of Construction Practice (CoCP) adequately captures the principles that will inform the various pre-construction plans to be submitted for review.	The draft Code of Construction Practice (CoCP) adequately captures the principles that will inform the various pre-construction plans to be submitted for review.	Agreed
DCO Plans	The DCO adequately provides for the various pre-construction plans outlined within the CoCP	The DCO adequately provides for the pre-construction plans outlined within the CoCP.	Agreed

4.6 Report to Inform Appropriate Assessment

- 31 A Report to Inform Appropriate Assessment (RIAA) was included with the application documents. The RIAA provide relevant authorities with a description of the project and implications for European protected sites. As per the relevant representation Table 5 identifies the status of discussions relating to the RIAA between the parties and focuses in particular on the adequacy of the information within it.
- 32 The RIAA was updated to account for the removal of the Option 2 Landfall and was submitted as Appendix 21 of the Applicant's Deadline 2 Submission (PINS Refs REP2-018 and REP2-019) and is therefore the revision of the document referred to hereafter.

Table 8 Status of discussions relating to the RIAA.

Discussion Point	Thanet Extension Position	DDC Position	Final Position
Policy and Planning	The assessment has identified all appropriate plans and policies relevant to onshore ecology and has given due regard to them within the assessment.	The assessment has identified all appropriate plans and policies relevant to onshore ecology and has had due regard to them in the assessment. This is dealt with in the HRA Screening Report and associated appendices (Report 8.1).	Agreed
Consultation	The ES chapter has been adequately updated following S42 and Evidence Plan consultation and concerns raised have been adequately addressed or clarified.	DDC can clarify that concerns raised in the S42 consultation and relevant representation (RR-029) have been adequately addressed, updated where necessary and clarified accordingly.	Agreed
Scope and Assessment methodology	The potential impacts identified are appropriate and accurate for onshore ecology receptors.	It is agreed that the potential impacts are identified and are appropriate for onshore ecology receptors and DDC wishes to raise no further comments in this regard.	Agreed
	The study area defined for the assessment is appropriate for the impacts considered.	It is confirmed that the study area defined for the assessment is appropriate for the impacts considered.	Agreed
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.	Sufficient data has now been collected following comments in the S42 consultation and relevant representation (RR-029) to characterise the baseline environment to inform the EIA.	Agreed

Discussion Point	Thanet Extension Position	DDC Position	Final Position
	The survey scopes and methodologies undertaken for the ecological surveys were adequate for characterising the baseline.	It is agreed the survey scope and methodologies undertaken for the ecological survey are adequate for characterising the baseline.	Agreed

5 Matters under discussion

- 33 This section identifies those matters raised by DDC 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 DDC.
- 34 At this stage there are no matters under discussion, subject the review of the final application documents.