

Vattenfall Wind Power Ltd

Thanet Extension Offshore Wind Farm

Annex B to Appendix 3 to Deadline 4B

Submission: Structure Exclusion Zone, Onshore
Heritage

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THANET EXTENSION ONSHORE WIND FARM

Environmental Statement Addendum,
Structure Exclusion Zone,
Onshore Heritage

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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 [PINs Ref APP-063/ Application Ref 6.3.7] and has previously been the subject of a single previous addendum [PINS Ref REP3-055], which specifically addressed a non-material difference in an assessment conclusion between Historic England and the Applicant (this being non-material in the sense that, having accepted Historic England's view, the effect was accorded a "minor" level of significance, this still being "not significant" for purposes of the EIA regulations, as set out in the original ES).

Specifically, this Addendum sets out consideration of potential effects on the significance of those heritage assets, as a result of the incorporation of a Structures Exclusion Zone (SEZ) into the Proposed Development. This would effectively prevent the placement of turbines located in strips along and within the western side of the red line boundary. The extent of the proposed SEZ is shown in Annex A to Appendix 3 of this this Deadline 4b submission on Figure 12.1a of the Seascape and Landscape Visual Impact Assessment (SLVIA), presented in the TEOW Environmental Statement Addendum – Exclusion Zone – *Chapter 5 Seascape and Landscape Visual Impact Assessment*. The SEZ is proposed primarily to address concerns regarding navigation issues and shipping safety.

As detailed within the Appendix 14 of the Applicant's Deadline 4 submission (REP4-018) the SEZ will prevent the placement of the Turbines and the Offshore Substation along the western most side of the red line boundary, there will be an increased distance between the potentially affected onshore heritage assets and the proposed turbines. As a consequence, any predicted impact will be lessened. This assessment starts from that premise and provides further details on specific assets where effects were previously predicted as noted above.

Consideration is given to whether this provides any specific lessening in predicted effects at the Margate Seafront Conservation Area, Margate Conservation Area and Broadstairs Conservation Area (these effects being scored as "minor" and not significant for purposes of the Environmental Impact Assessment (EIA) Regulations).

No change in the proposed landfall, onshore cable route and substation arrangements is proposed and no further assessment is required in regard to potential direct impacts on onshore heritage assets.

1.2 Methodology

The assessment presented in this Addendum is the same as that presented in Chapter 7 of the ES (PINS Ref *ibid*), (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.

This assessment has been supported by review of wireline visualisations prepared in support of the SLVIA addendum. Reference is made to those visualisations below as appropriate, with the visualisations provided with Annex A to Appendix 4 of this Deadline 4a submission.



It is not proposed to repeat the assessments presented in Chapter 7 of the ES (as amended by the Addendum presenting a reassessment of Margate Seafront Conservation Area (PINS Ref *ibid*). Rather, this document presents a consideration of whether any effects previously predicted to occur to selected onshore heritage assets have those effects specifically changed (lessened) to such a degree that the level of effect previously predicted would now be reduced.

1.3 Consultation

No consultation has been undertaken with Kent County Council (KCC) or Historic England's (HE) relevant officers with regard to potential heritage effects from the SEZ as yet. However, this addendum is part of a suite of documents on which KCC and HE will be consulted with regard to the SEZ.

1.4 Assessment

1.4.1 General

The SEZ will mean that turbines will be placed further away from the coast than shown in the ES. Effectively it will prevent turbines being placed along the western most boundary, and within an area of the north-western corner of the application site.

In general, this will mean that turbines, where visible, will typically be further away from onshore assets, but the degree of horizontal visibility of the TEOW development as a whole will not necessarily be changes (in crude terms of its North-south extent when viewed directly from the west). The exclusion of the north-western corner and westernmost row from development does mean that the east-west extent of the Development will be reduced and this effect will be increasingly noticed in views from the south and south-west.

1.4.2 Margate Seafront Conservation Area

The Margate Seafront Conservation Area was not originally predicted to receive any effect upon its significance as a result of the TEOW proposal. Following consultation and subsequent discussion with Historic England, a reassessment was undertaken and this concluded that there was an effect of "minor" significance upon the Area, in part due to the perception of moving turbine blades above the roofline of the town and a sense in which the offshore nature of the TEOW scheme is blurred by appearing "onshore" and behind the townscape (effectively onshore) in views from the west. This was reported in an Addendum to the ES prepared in March 2019.

The adoption of the SEZ represents a noticeable change in views across and towards Margate from the west, as shown in Figure 12.28c and 12.28c SEZ. There is a clear reduction in the offshore lateral extent of the TEOW scheme to the north (left in this view), and a less noticeable reduction in the height of the turbines in this view. The blades are still likely to be seen moving above the roofline of the conservation Area, and the predicted effect, although lessened, may still be apparent. However, this effect will be rapidly lost, the closer the viewer moves towards Margate. Nevertheless, it is considered that some harm to the character and appearance of the Area will still be occasioned, albeit less than substantial and at the lowest end of the scale and therefore the predicted effect is still assessed as "minor" (this not being regarded as "significant" for purposes of the EIA regulations). The matter of the 'pre-SEZ' harm being less than substantial is already a matter of agreement with Historic England, and the addition of the SEZ is not considered likely to alter this position.

1.4.3 Margate Clifftop Conservation Area



This Conservation Area was predicted to receive an effect of “minor” significance upon its significance. As with the Seafront Area, the effect was considered due to the sense in which the TEOW turbines appeared to make landfall and be visible above and beyond the landforms visible within the Area.

The SEZ layout will have a similar effect to that recorded for the Seafront Area, in that the lateral (northward) extent of the TEOW will be reduced out to sea, but the landward extent and height will not be significantly changed (see Figure 12.40c and 12.40c SEZ). As a result, the predicted effect will still be noticeable, albeit any harm occasioned is considered to be less than substantial and at the very lowest end of the scale. The previously predicted effect of “minor” significance is still considered to occur (this is not considered significant for purposes of the EIA regulations). The matter of the ‘pre-SEZ’ harm being less than substantial is already a matter of agreement with Historic England, and the addition of the SEZ is not considered likely to alter this position.

1.4.4 Broadstairs Conservation Area

The ES assessed the effect on the significance of the Broadstairs Conservation Area as “minor” (and not significant for purposes of the Regulations). This was due, as with the preceding Areas, in part from the lateral extent of the TEOW Development to the north (the left as shown in Figure 12.31b) so that turbines appeared to make landfall, and be seen behind existing landforms, blurring the clear identification of the Development as an offshore feature. In particular, turbines were also seen above the landform and close to the Listed Bleak House.

The SEZ will have the effect of limiting the lateral extent of the TEOW Development, and noticeably reducing the height and proximity of the turbines compared to the layout presented in the ES (as shown in Figure 12.31b SEZ). The reduction in the lateral extent of the TEOW scheme will have the benefit of ensure that no turbines are seen in close juxtaposition with Bleak House, and the blurring of the onshore/offshore distinction will be removed (in this view point), with the Proposed Development clearly being an offshore feature. There is a noticeable reduction in height and proximity of the TEOW turbines compared to the ES layout and a clearer sense of separation from the harbour (and listed structures on the harbour structure) and the bay which fronts the Conservation Area.

The previously predicted effect is noticeably lessened with at least one of the factors noted as causing “harm” eliminated. Nevertheless, the presence of the TEOW scheme fairly close offshore and at a noticeably different scale to the existing TOW turbines, is considered to represent a change in setting for the Area and brings large scale industrial structures much closer to the shore and in views from and over parts of that Area. In this respect, the character and appearance of the Area is not preserved, and some limited harm is still assessed to occur (albeit, less than substantial and at the lowest end of the scale). Consequently, the effect is still predicted to be “minor” in significance and not significant for purposes of the Regulations. The matter of the ‘pre-SEZ’ harm being less than substantial is already a matter of agreement with Historic England, and the addition of the SEZ is not considered likely to alter this position.

1.4.5 Reculver and Richborough Roman Forts

Although no significant effects were predicted upon the heritage significance of these assets as a result of the proposed TEOW Development, they are considered here having regard to the SEZ as they had been subject of attention by the Examining Authority after the submission of the Application.

The adoption of the SEZ will lead to a noticeable reduction in the lateral extent of the TEOW Development to the north (left in views, see Figure 12.27c and 12.27 SEZ) for Reculver. No effect on the heritage significance of this asset was identified which this change will address, and the



original assessment is still valid. There will be effectively no noticeable change with regards to Richborough, but no effect on the heritage significance of this asset is in any case predicted to occur, and the original assessment is still considered valid with respect to the SEZ.

1.5 Summary

Although no specific reduction in any previously identified effects are considered to occur in EIA terms (i.e. in respect of level of significance of effect), the adoption of the SEZ will be beneficial in that there will still be a noticeable reduction in the visibility of the TEOW Development (in terms of lateral extent and/or height and proximity of the turbines) and the potential for harm to heritage significance is reduced. This does lead to a reduction in the degree of harm (and in the case of Broadstairs eliminates one specific cause of harm), albeit not to the extent that the previously accorded levels of significance (in EIA terms) of the predicted effect are altogether removed. Nevertheless, this reduction in impact is an improvement on the situation presented in the ES.