

Vattenfall Wind Power Ltd

Thanet Extension Offshore Wind Farm

Appendix 33 to Deadline 5 Submission: Statement
of Common Ground – Kent & Essex Inshore
Fisheries Conservation Authority

Relevant Examination Deadline: 5

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Table of Contents

1	Introduction	4
1.1	Overview	4
1.2	Approach to SoCG	4
1.3	The Development.....	5
2	Kent and Essex IFCA Remit.....	6
3	Consultation	7
3.1	Application elements under Kent & Essex IFCA’s remit.....	7
3.2	Consultation Summary.....	7
3.3	Post-application Consultation.....	7
4	Agreements Log	9
4.1	Marine ecology and environment.....	9
4.2	Commercial Fisheries	12
4.3	Offshore Designated Sites	15
5	Matters under discussion	18
	Table 1: Consultation undertaken with Kent & Essex IFCA pre-application.....	7
	Table 2: Consultation undertaken with Kent & Essex IFCA post-application	8
	Table 3: Status of discussions relating to Marine Ecology.....	10
	Table 4: Status of discussions relating to Commercial Fisheries	13
	Table 5: Status of discussions relating to Offshore Designated Sites (including Marine Conservation Zones)	16

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 the Kent & Essex Inshore Fisheries and Conservation Authority (Kent & Essex IFCA) 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 the Kent & Essex IFCA 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 Kent & Essex IFCA, the SoCG is focused on those issues raised by Kent & Essex IFCA through the Evidence Plan process, noting that responses at S42 and relevant representation stage have not been received.
- 5 The structure of the SoCG is as follows:
 - Section 1: Introduction;
 - Section 2: Kent and Essex IFCA Remit;
 - Section3: Consultation;
 - Section 4: Agreements Log; and
 - Section 5: Summary.

1.3 The Development

- 6 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.
- 7 The key offshore components of Thanet Extension are likely to include:
 - Up to 34 Offshore WTGs;
 - OSS (if required);
 - Meteorological Mast (if required);
 - WTG 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).
- 8 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 (MWHS) and the lowest point of the blade.
- 9 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.
- 10 More details on the proposed development are described in the Environmental Statement (ES) Volume 2, Chapter 1: Project Description (Offshore) (Application Ref 6.2.1) and Volume 3, Chapter 1: Project Description (Onshore) (Application Ref 6.3.1) of the Environmental Statement.

2 Kent and Essex IFCA Remit

- 11 Inshore Fisheries and Conservation Authorities will lead, champion and manage a sustainable marine environment and inshore fisheries, by successfully securing the right balance between social, environmental and economic benefits to ensure healthy seas, sustainable fisheries and a viable industry.

3 Consultation

3.1 Application elements under Kent & Essex IFCA’s remit

- 12 Work Nos. 1 – 3B, detailed in Part 1 of Schedule 1 of the draft DCO describe the elements of Thanet Extension which may affect the interests of Kent & Essex IFCA.
- 13 The technical components of the DCO application of relevance to Kent & Essex IFCA (and therefore considered within this SoCG) comprise the Environmental Statement. No response was received during the statutory consultation period regarding the Preliminary Environmental Information Report.

3.2 Consultation Summary

- 14 This section briefly summarises the consultation that VWPL has undertaken with Kent & Essex IFCA. 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 (Application Ref: 8.5).

Table 1: Consultation undertaken with Kent & Essex IFCA pre-application

Date & Type:	Detail:
28 th February 2017	Evidence Plan Meeting - Marine Ecology Review Panel
26 th May 2017	Evidence Plan Meeting - Marine Ecology Review Panel

3.3 Post-application Consultation

- 15 VWPL has engaged with Kent & Essex IFCA 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 Kent & Essex IFCA is detailed in Table 2.

Table 2: Consultation undertaken with Kent & Essex IFCA post-application

Date/ Type:	Detail:
15 th October 2018	Meeting to discuss the development of a SoCG
7 th December 2019	Meeting to discuss the development of a SoCG
15 th February 2019	Meeting to discuss the development of a SoCG
1 st March 2019	Meeting to discuss the development of a SoCG
11 th April 2019	Meeting to discuss the development of a SoCG

4 Agreements Log

- 16 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 3.1). 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 Marine ecology and environment

- 17 The Project has the potential to impact upon marine ecological receptors, and these interactions are duly considered within Volume 2, of the ES. Specifically, within Chapter 4: Offshore Ornithology, Chapter 5: Subtidal and Intertidal Ecology, Chapter 6: Fish and Shellfish Ecology, and Chapter 7: Marine Mammals (PINS Ref APP-045, APP-046, APP-047 and APP-048/ Application Refs 6.2.4, 6.2.5, 6.2.6, and 6.2.7) of the ES. Table 3 identifies the status of discussions relating to these topic areas between the parties.

Table 3: Status of discussions relating to Marine Ecology

Discussion Point	Thanet Extension Position (it is agreed that)	KEIFCA Position	Final Position
Policy and Planning	The assessment has identified all appropriate plans and policies relevant to marine ecology and has given due regard to them within the assessment.	This is agreed.	Agreed
Scope and Assessment methodology	The potential impacts identified are appropriate and accurately reflect the potential impacts on marine ecology receptors.	It is agreed that the appropriate impacts have been identified and an appropriate methodology has been applied.	Agreed
Baseline data used in the assessment	Sufficient data has been collated to appropriately characterise the baseline environment for the purposes of informing the EIA.	It is agreed that the baseline is adequately characterised with the exception of the cumulative effects on the baseline (please see the row below).	Agreed*
Mitigation Measures	The embedded mitigation measures are considered appropriate.	This is agreed.	Agreed

Discussion Point	Thanet Extension Position (it is agreed that)	KEIFCA Position	Final Position
Disposal of material	The Applicant has submitted revised version of the Sandwave Clearance, Dredge and Disposal Site Characterisation (Appendix 15 to Deadline 4 Submission)(PINS Ref REP4-019) which addresses KEIFCA’s concerns.	This is under discussion with the Applicant.	Under discussion
Outcomes of the EIA	The assessment criteria and assignment of significance is appropriate.	This is agreed noting the KE IFCA position on cumulative effects in the row below.	Agreed
Cumulative effects assessments	The cumulative project list was agreed as part of the Evidence Plan.	The cumulative project list was agreed as part of the Evidence Plan. However, it is the KE IFCA’s revised position that both existing projects and future projects should be considered in the assessments of proposed developments.	Agreed, and note that this request is not to revisit the cumulative assessment methodology but a position for consideration in the future

4.2 Commercial Fisheries

- 18 The Project has the potential to impact upon commercial fisheries and these interactions are duly considered within Volume 2, Chapter 9: Commercial Fisheries (PINS Ref APP-050/ Application Ref 6.2.9) of the ES. Table 4 identifies the status of discussions relating to this topic area between the parties.

Table 4: Status of discussions relating to Commercial Fisheries

Discussion Point	Thanet Extension Position	KEICFA Position	Final Position
Baseline data used in the assessment	Sufficient data has been collated to appropriately characterise the baseline environment for the purposes of informing the EIA.	It is agreed that the baseline is the best available data for the purposes of EIA with the understanding that the Applicant has been liaising directly with the TFA on this matter.	Agreed
Consultation	The ES chapter has been adequately updated following consultation and concerns raised have been adequately addressed or clarified.	KEIFCA's agree that the concerns raised during the formal process have been discussed or clarified. KEIFCA agree that the concerns over displacement of fishing and loss of grounds have been sufficiently addressed subject to the Applicants agreement with TFA and with the understanding that the Applicant is liaising directly with TFA to address these issues.	Agreed
Scope and Assessment methodology	The potential impacts identified are appropriate and accurately reflect the potential impacts on the fishing fleet.	Agreed – all potential impacts are identified, and with the understanding that the Applicant is liaising directly with the TFA to address outstanding issues regarding assessment criteria.	Agreed
Mitigation Measures	The embedded mitigation measures are considered appropriate.	This is agreed subject to the final agreement of the co-existence plan with TFA (please see below).	Agreed*

Discussion Point	Thanet Extension Position	KEIFCA Position	Final Position
	The co-existence plan provides sufficient information about the methodology and mechanisms for information exchange.	This is agreed	Agreed
Outcomes of the EIA	The conclusions of the assessment accurately reflect the potential significance (in EIA terms) of the identified impacts on the fishing fleet.	KEIFCA understand that there is ongoing discussion between the Applicant and the TFA regarding the assignment of significance and the impact of loss of fishing ground. KEIFCA agree with the outcomes of the EIA assessment subject to the Applicants agreement with TFA on this matter and with the understanding that the Applicant is liaising directly with TFA to address these issues.	Agreed
Cumulative effects assessments	The cumulative project list was agreed as part of the Evidence Plan.	The cumulative project list was agreed as part of the Evidence Plan. However, it is the KE IFCA's revised position that both existing projects and future projects should be considered in the assessments of proposed developments.	Agreed, and note that this request is not to revisit the cumulative assessment methodology but a position for consideration in the future.

4.3 Offshore Designated Sites

- 19 The Project has the potential to impact upon conservation interests and marine designated sites and these interactions are duly considered within Volume 2, Chapter 8: Offshore Designated Sites (PINS Ref APP-049/ Application Ref 6.2.8) of the ES. Table 5 identifies the status of discussions relating to this topic area between the parties. A full consideration of the effects on the features and conservation objective on Natura 2000 sites is provided in the Report to Inform Appropriate Assessment (Application Ref 5.2).

- 20 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 Ref REP2-018 and REP2-019) and is therefore the revision of the document referred to hereafter.

Table 5: Status of discussions relating to Offshore Designated Sites (including Marine Conservation Zones)

Discussion Point	Thanet Extension Position (it is agreed that)	KEICFA Position	Final Position
Policy and Planning	The assessment has identified all appropriate plans and policies relevant to the offshore designated sites and has given due regard to them within the assessment.	This is agreed.	Agreed
Baseline data used in the assessment	Appropriate data and information was used to characterise the baseline for the purposes of the assessment.	This is agreed.	Agreed
Scope and Assessment methodology	All relevant designated sites have been accurately identified and included within the assessment.	This is agreed.	Agreed
Mitigation Measures	The mitigation measures identified within the ES and accompanying documentation are considered appropriate.	The KEIFCA’s position is that HDD is the preferred landfall option. All aspects are currently agreed.	Agreed
Outcomes of the assessments	<p>The conclusions of the ES assessment accurately reflect the potential impacts on the designated sites.</p> <p>The Applicant has submitted a revised Marine Conservation Zone assessment (PINS Ref REP4-024) which addresses the concerns raised by the IFCA in regard to the Goodwin Sands pMCZ.</p>	To be confirmed	Under discussion

Discussion Point	Thanet Extension Position (it is agreed that)	KEICFA Position	Final Position
Cumulative effects assessments	The cumulative project list was agreed as part of the Evidence Plan.	The cumulative project list was agreed as part of the Evidence Plan. However, it is the KE IFCA’s revised position that both existing projects and future projects should be considered in the assessments of proposed developments.	Agreed, and note that this request is not to revisit the cumulative assessment methodology but a position for consideration in the future

5 Matters under discussion

- 21 This summary section identifies those matters raised by Kent & Essex IFCA 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 Kent & Essex IFCA.
- 22 KEIFCA reserve the right to amend their advice in response to any future changes made by the applicant regarding the proposed development.
- 23 KEIFCA support the responses of the representative statutory nature consultee bodies included in this process.