

Vattenfall Wind Power Ltd

Thanet Extension Offshore Wind Farm

Statement of Common Ground – Historic England

Relevant Examination Deadline: 5

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1 Introduction

1.1 Overview

1 *This document is considered a working draft to provide a progress update to the Examining Authority. It should be noted that Historic England's position is subject to legal review as such may be subject to change.*

2 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).

3 This SoCG with Historic England (HE) 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 HE on the Application.

4 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

5 This draft SoCG has been prepared by the applicant and focuses on the issues and matters raised by Historic England in response to the formal EIA Scoping Exercise, and the Preliminary Environmental Information Report consultation (s. 42) conducted as part of the pre-application process, and in relation to the Applications Environmental Statement and supporting information.

6 The structure of the SoCG is as follows:

- Section 1: Introduction;
- Section 2: Historic England's Remit;
- Section 2: Consultation;
- Section 4: Agreements Log; and

- Section 5: Matters Under Discussion.

1.3 The Development

- 7 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.
- 8 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.
- 9 The key offshore components of Thanet Extension are likely to include:
 - 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).
- 10 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 Mean High Water Springs (MHWS), a maximum diameter of 220 m and a minimum 22 m clearance between the MHWS and the lowest point of the rotor.
- 11 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.

- 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 ES.

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2 Historic England's Remit

- 13 The Historic Buildings and Monuments Commission for England (HBMCE), known as Historic England, is the Government's statutory adviser in relation to the historic environment in England. It was set up by the National Heritage Act 1983, and the National Heritage Act (2002) gave HBMCE responsibility for maritime archaeology in the English area of the UK Territorial Sea.
- 14 HBMCE is a Non-Departmental Public body sponsored by the Department for Digital Culture, Media and Sport (DCMS). Our remit in the historic environment intersects with the policy responsibilities of a number of other government departments – particularly the Ministry of Housing, Communities and Local Government, with their responsibilities for land use planning matters.

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3 Consultation

3.1 Application elements under Historic England's 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 HE.
- 16 The technical components of the DCO application of relevance to HE (and therefore considered within this SoCG) comprise:
- Volume 1 Chapter 3: Environmental Impact Assessment Methodology – (PINS Ref APP-038/ Application Ref 6.13)
 - Volume 2 Chapter 2: Marine Geology, Oceanography and Physical Processes (PINS Ref APP-043/ Application Ref 6.2.2)
 - Volume 2, Chapter 13: Offshore Archaeology and Cultural Heritage (PINS Ref APP-054/ Application Ref 6.2.13);
 - Volume 3, Chapter 7: Historic Environment (PINS Ref APP-063/ Application Ref 6.3.7);
 - Volume 4, Annex 13.1 and Annex 13.2 technical baseline documents (PINS Refs APP-091 and APP-092/ Application Refs 6.4.13.1 and 6.4.13.2 respectively);
 - Offshore Written Scheme of Investigation (PINS Ref REP1-016 which supersedes Application Ref 8.6);
 - Draft Onshore Written Scheme of Investigation (PINS Ref REP4-008); and
 - Draft Development Consent Order.

3.2 Consultation Summary

- 17 This section briefly summarises the consultation that VWPL has undertaken with HE. 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 Historic England pre-application

Date & Type:	Detail:
21/10/2016 Pre-scoping exercise & evidence plan meeting	Head of Marine Planning attended pre-scoping exercise meeting with Vattenfall and consultants.
11/11/2016	HE returned comments on draft Evidence Plan for pre-application consultation to consultants and developer.
27/2/2017 Technical Review Panel	HE attendance at Onshore Expert Topic Group Workshop at Sandwich (Kent).
28/2/2017 technical Review Panel	HE attendance at Offshore Expert Topic Group Workshop in London.
4/10/2017	HE attendance at Preliminary Environmental Information Report (PEIR) consultation workshop: coastal/marine archaeology & seascape and landscape in Ramsgate.
12/11/18, S42 Consultation	HE comments returned relating to the Preliminary Environmental Information Report.
31/1/2018 PEIR submission comments discussions	HE took part in phone conference with consultants to review HE PEIR submission comments for marine archaeological components.

3.3 Post-application Consultation

18 VWPL has engaged with HE 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 HE is detailed in Table 2.

Table 2: Consultation undertaken with Historic England post-application

Date/ Type:	Detail:
17 th October 2018	<p>Meeting to discuss the documents submitted as part of the DCO application in relation to marine archaeology and historic environment matters and Historic England 500 word summary within Planning Inspectorate Registration and Relevant Representation.</p> <p>Meeting to discuss the development of a SoCG</p>
5 th December 2018	<p>The site visit to selected viewpoints with Historic England and the heritage consultant was conducted. Site visit meeting notes were circulated by Mark Turner (heritage consultant, Wessex Archaeology) on 14 January 2019, which are attached as an appendix. We agree with the minutes, although note that it was also agreed that the assessment of the degree of harm to Margate’s Conservation Area would be amended in the Environmental Statement to reflect discussions on site.</p>
14 th March 2019	<p>Teleconference to discuss the development of the SoCG</p>
April 2019	<p>Email correspondence to discuss the development of the SoCG</p>

4 Agreements Log

- 19 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.

4.2 Offshore Archaeology and Cultural Heritage

- 20 The Project has the potential to impact upon offshore archaeology and cultural heritage. These interactions are duly considered within Volume 2, Chapter 13 of the Thanet Extension ES, and agreed mitigation measures provided for within the DCO and dML(s). Table 1 identifies the status of discussions relating to this topic area between the parties.

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Table 3: Status of discussions relating to Offshore Archaeology and Cultural Heritage.

Discussion Point	Thanet Extension Position	HE Position	Final Position
Policy and Planning	The assessment has identified all appropriate plans and policies relevant to historic environment assessment and has given due regard to them within the assessment.	<p>We can agree that a full list of marine policy has been included within Table 13.1: Legislation and policy context in Environmental Statement Volume 2, Chapter 13: Offshore Archaeology and Cultural Heritage.</p> <p>Specific reference to <i>Overarching National Policy Statement for Energy (EN-1)</i> (DECC, 2011) and the <i>National Policy Statement for Renewable Energy Infrastructure (EN-3)</i> (DECC, 2011b) has been included within the assessment criteria and assignment of significance, (as summarised in ES Volume 2, Chapter 13: Offshore Archaeology and Cultural Heritage – paragraph 13.5 Assessment criteria and assignment of significance). Ultimately we consider this is a matter to be determined by the Examining Authority.</p>	
Consultation	The ES chapter has been adequately updated following S42 and Evidence Plan consultation and concerns raised have been adequately addressed or clarified.	Comments we provided to the Thanet Extension Offshore Wind Farm – Preliminary Environmental Information Report (related to Volume 2 – Chapter 13: Offshore Archaeology and Cultural	

Discussion Point	Thanet Extension Position	HE Position	Final Position
		<p>Heritage and Volume 4, Annex 13-2 – Offshore Archaeology Geophysical and Geotechnical Report) for the consultation exercise under Section 42, have been included in Table 13.2: ‘Summary of consultation relating to Offshore Archaeology and Cultural Heritage’. Whilst we are generally satisfied that our comments have been sufficiently addressed (helpfully recorded in the third column of this table), there are a series of points detailed within our Written Representation (dated 15/01/2019) that have since been captured, principally with the Offshore WSI.</p>	
<p>Scope and Assessment methodology</p>	<p>The potential impacts identified are appropriate and accurate for the relevant receptors.</p>	<p>Agree. Direct and indirect effects upon known and potential marine archaeological receptors are included within Sections 13.11, 13.12 and 13.13 (Volume 2 – Chapter 13: Offshore Archaeology and Cultural Heritage) for the construction, operational & maintenance, and decommissioning phases. As such we found this component of the ES to be detailed with well supported information on each receptor, proportionate to the scale of the project, as defined within the maximum adverse scenario</p>	

Discussion Point	Thanet Extension Position	HE Position	Final Position
		(Table 13.11).	
	The study area defined for the assessment is appropriate for the impacts considered.	Agree. We consider the study area defined for the assessment is appropriate for the impacts outlined in the Environmental Statement.	
Data used in the assessment	The list of primary and secondary data sources used (as detailed in paragraph 13.4.3, in Environmental Statement Volume 2, Chapter 13: Offshore Archaeology and Cultural Heritage) to characterise the existing environment for the purposes of informing the EIA is proportionate.	Agree. We are content with the sources used and the extent of data coverage and quality used to perform for characterisation purposes for the application. (See Written Representation comment 4.13).	
	All data gaps have been highlighted and all appropriate measures for filling any data gaps have been proposed.	Agree. We requested additional consideration on this element (see Written Representation comments 4.13 and 6.6 for reference). The Offshore WSI has since addressed these points in sections 7.6 'Areas not yet covered by survey data' and 7.7 'Areas of high archaeological potential'.	
Mitigation Measures	The embedded mitigation measures found here: Environmental Statement Volume 2, Chapter 13: Offshore Archaeology and Cultural Heritage – paragraph 13.10 Embedded mitigation) are	Agree. We accept that the provision of embedded mitigation as summarised within Table 13.12, through a project archaeological reporting protocol and archaeological exclusion	

Discussion Point	Thanet Extension Position	HE Position	Final Position
	<p>considered appropriate.</p>	<p>zones (AEZ) are a standard industry approach, however further specific schemes of investigation – such as those included within the draft WSI provided – will be necessary to comprehensively account for the number, extent and positioning of AEZs. (see Written Representation comments 4.8 for reference for agreement on AEZs).</p>	
	<p>The Outline Offshore WSI (Application Ref 8.3) is considered appropriate with regard to monitoring and management principles.</p>	<p>x Agree.</p> <p>The relevant comments (section 6.) related to the Offshore WSI detailed within our Written Representation (date 15.1.19) have since been appropriately addressed, with additional content also included within the Outline Offshore WSI (Application Ref 8.3), specifically sections 7.7 ‘Areas of high archaeological potential’ and 9.11 ‘Potential Local Economic Benefits to Local Community’.</p>	

Discussion Point	Thanet Extension Position	HE Position	Final Position
Outcomes of the EIA	The assessment criteria and assignment of significance is proportionate.	Agree. The assessment criteria and assignment of significance, (as summarised in ES Volume 2, Chapter 13: Offshore Archaeology and Cultural Heritage – paragraph 13.5 Assessment criteria and assignment of significance) is proportionate.	
	The sensitivity and importance of the receiving environment is accurately described within the Environmental Statement.	We consider this element may require further discussions with the applicant (see Written Representation comments 4.6 for reference, such that section 13.5 of the ES (Chapter 13) considers the basis for assessment criteria and assignment of significance relevant to prehistoric archaeological remains also).	
	The conclusions of the assessment accurately reflect the potential impacts on the receiving environment within the study area.	Agree. We consider the conclusions of the assessment accurately reflect the potential impacts on the receiving environment within the study area, as detailed in Environmental Statement Volume 2, Chapter 13: Offshore Archaeology and Cultural Heritage Table 13.17: Summary of predicted impacts of Thanet	

Discussion Point	Thanet Extension Position	HE Position	Final Position
	<p>The cumulative effects have been adequately and appropriately described within the ES and the conclusions are appropriate.</p>	<p>Extension.</p> <p>Agree. We confirm that cumulative effects on known and potential marine archaeological receptors have been considered within the ES. We accept that impact from other projects are unlikely due to distance, and indirect impacts from Thanet Offshore Wind Farm are localised, with incremental changes over time managed through standard mitigation measures across the EIA process (13.14 Environmental assessment: cumulative effects and Table 13.17: Summary of predicted impacts of Thanet Extension) (as we detailed in our Written Representation comments 4.14, dated 12.1.2019.)</p>	

4.3 Onshore Historic Environment

- 21 The Project has the potential to impact upon the onshore historic environment. These interactions are duly considered within Volume 3, Chapter 7 of the Thanet Extension ES, with control and mitigation measures provided for within the DCO. Table 24 identifies the status of discussions relating to this topic area between the parties.

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Table 4: Status of discussions relating to Onshore Historic Environment.

Discussion Point	Thanet Extension Position	HE Position	Final Position
Policy and Planning	The assessment has identified all appropriate plans and policies and guidance relevant to onshore historic environment and has given due regard to them within the assessment.	Agree	
Consultation	The ES chapter has been adequately updated following S42 and Evidence Plan consultation and queries raised have been adequately addressed or clarified.	In our S.42 response Historic England noted that we did not agree with the assessment of harm to the significance of the Margate Conservation Area which we assess to be low rather than “not a significant” impact as stated in the Environment Statement (ES). This impact was most appreciable in a long view from West Brook. We have subsequently met the applicant’s heritage consultant and in discussion reached agreement on the level of harm which we all agree is low. An addendum to the ES has been submitted to reflect this updated position, and we now agree with the level of harm assigned.	
Scope and Assessment methodology	The potential impacts identified are appropriate and accurate for the relevant heritage assets.	We agree that the list of Heritage Assets identified is comprehensive. We note that the levels of harm have been changed in the assessment in the Environmental Statement	

Discussion Point	Thanet Extension Position	HE Position	Final Position
		<p>Volume 3, Chapter 7: Onshore Historic Environment Document since our S42 response. We broadly agree with the new levels of assessment, although we think that there is a low level of harm caused to Margate’s Conservation Area by the wind turbines appearing over the top of the town which is a greater level of harm than the ES currently ascribes to the impact. This has been addressed and amended in the addendum to the ES dated March 2019 ‘Appendix 36 to Deadline 3 Submission Environmental Statement Addendum, Onshore Heritage’</p>	
	<p>The potential impacts identified are appropriate and accurate for the relevant archaeological receptors.</p>	<p>We think that the scheme’s impact upon early Roman period archaeology and 20th century defences at Pegwell Bay is still uncertain; and that further assessment of the potential for, and impact upon, such remains is required. We agree that further assessment should be secured through an Onshore WSI. A Draft Onshore WSI has now been submitted and we have provided comments on it within a letter responding to the Examining Authority’s written questions (ExQ2).</p>	

Discussion Point	Thanet Extension Position	HE Position	Final Position
	The study area defined for the assessment is appropriate for the impacts considered.	Agree	
	The methods for assessing potential impacts on significance of designated heritage assets through change to their setting is considered appropriate.	Agree	
	The scopes and methodologies undertaken for the viewpoints were adequate for characterising the baseline and informing photomontage drafting.	This should be reflected in the Onshore Table agreement Log below.	
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.	Agree	
	The scopes and methodologies undertaken for the viewpoints were adequate for characterising the baseline and informing photomontage drafting.	Agree	
Mitigation Measures	The embedded mitigation measures are considered appropriate and are appropriately secured through the DCO.	Mitigation measures for designated heritage assets are set out on pp 7-46 within the Environmental Statement Volume 3, Chapter 7: Onshore Historic Environment Document. This notes that the NW extent of red line was reduced	

Discussion Point	Thanet Extension Position	HE Position	Final Position
		<p>to the NW which would increase the perceived separation of the turbines from heritage assets in some views. The red line has since been further amended to include a Structures Exclusion Zone to the western side of the turbine area. This has further increased the separation of the turbines to the shore and slightly increases the perceived separation of the turbines from heritage assets in some views. Although we think that this does not change the levels of impact and harm as set out in the ES, we nevertheless think that these mitigation measures are appropriate.</p> <p>We agree that harm to non-designated archaeology may be sufficiently mitigated by means of a programme of archaeological works, the Written Scheme of Investigation (WSI) for which has now been submitted. Historic England has provided some comments on the WSI, and discussions with the applicant are on-going with regards to the revision of the WSI - in order that it meets the approval of both Historic England and the KCC Heritage Conservation Team.</p>	

Discussion Point	Thanet Extension Position	HE Position	Final Position
Outcomes of the EIA	The assessment methodology for the level of importance ascribed is appropriate	Agree for onshore designated heritage assets.	
	The sensitivity and importance of the receiving environment is accurately described within the Environmental Statement.	Agree	
	The conclusions of the assessment accurately reflect the potential impacts on the significance of heritage assets identified within the study area.	We broadly agree with the conclusions of the assessment for impacts to designated onshore heritage. We assessed that the proposal would cause a low level of harm to Margate Conservation Area in contrast to the original ES. Our position has been accepted by the heritage consultant and an addendum to the ES finalising the position has been submitted.	
	The conclusions of the assessment accurately reflect the potential impacts on the significance of archaeological receptors identified within the study area.	We think that impact upon potential heritage assets at Pegwell Bay has been assessed as far as is possible through desk-based survey alone. A complete understanding of impact will only be possible through a programme of intrusive assessment, which should be carried out post-DCO determination. Such assessment is required to inform the detailed design of the scheme so	

Discussion Point	Thanet Extension Position	HE Position	Final Position
		<p>that harm to archaeological remains may be avoided, minimised and mitigated as appropriate. If nationally important (but undesignated) remains were identified, the most appropriate response to this is likely to be preservation in-situ and not excavation. A WSI for further onshore archaeological works has been submitted, and discussions with the applicant are on-going with regards to the revision of this WSI - in order that it meets the approval of both Historic England and the KCC Heritage Conservation Team.</p>	
	<p>The cumulative effects have been adequately and appropriately described within the ES and the conclusions are appropriate.</p>	<p>We agree the cumulative effects are adequately and appropriately described for impacts to onshore designated heritage assets.</p>	

5 Matters under discussion

22 This summary section identifies those matters raised by HE 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 HE.

23 All offshore matters are considered to be resolved.

5.2 Onshore matters under discussion

Discussion Point	Thanet Extension Position
Consultation	The ES chapter has been adequately updated following S42 and Evidence Plan consultation and concerns queries raised have been adequately addressed or clarified.
Scope and Assessment methodology	The potential impacts identified are appropriate and accurate for the relevant heritage assets.
Mitigation Measures	<p>The embedded mitigation measures are considered appropriate and are appropriately secured through the DCO.</p> <p>Discussions are on-going with regards to revision of the submitted onshore WSI in order that it meets the approval of both Historic England and the KCC Heritage Conservation Team.</p>
Outcomes of the EIA	The conclusions of the assessment accurately reflect the potential impacts on the significance of heritage assets identified within the study area.