

# **Vattenfall Wind Power Ltd**

## **Thanet Extension Offshore Wind Farm**

Appendix 28 of the Applicant's Deadline 6

Submission: SEZ Material Change Consultation

Report

Relevant Examination Deadline: 6

Submitted by Vattenfall Wind Power Ltd

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Revision A

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## Annexes referred to

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Annex A	Copy of the consultation notification letter sent to consultees.
Annex B	Copy of the consultation notification email sent to consultees.
Annex C	List of consultees and consultation tracker.
Annex D	Copies of responses received from consultees.
Annex E	Applicant's Response to Port of London Authority and Estuary Services Ltd Consultation Response.

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# 1 Introduction

## 1.1 Overview

- 1 This Consultation Report has been prepared by Vattenfall Wind Power Ltd (VWPL) (the 'Applicant') in respect of its application for a Development Consent Order (DCO). The Applicant submitted an application (the 'Application') to the Planning Inspectorate (PINS) on 27 June 2018 under Section 37 of The Planning Act 2008 (the 'Act') to authorise the construction, operation and maintenance of Project. The Application was accepted for Examination by the PINS on 23 July 2018 and the Examination began on 11 December 2018.
- 2 Following Deadline 3 of the Examination, the Applicant committed to amend the project to seek to address issues raised by Interested Parties (IPs) concerning availability of sea room and navigational safety in the area to the west of the array.
- 3 At Deadline 4 of the Examination (28/03/19), the Applicant advised the Examining Authority (ExA) in its covering letter that it was intending to amend the project to include a Structures Exclusion Zone (SEZ) within the offshore array section of the Order Limits. This area would preclude placement of turbines and other structures as a way of addressing shipping and navigation concerns raised by IPs, whilst allowing for the placement of subsea cables and other activities.
- 4 The Applicant also advised the ExA that although the SEZ does not affect the Order Limits, the introduction of an SEZ could result in potential changes to environmental effects as assessed in the Environmental Statement (ES), and therefore should be considered a material change to the Application in that regard.
- 5 On 09/04/19, the ExA issued a procedural decision accepting the material change into the Examination. Considering the SEZ as a material change to the Application, the Applicant has undertaken targeted consultation on the proposed change and produced a package of consultation documents setting out information on the proposed material change. Consultees were notified of consultation on 25/04/19 and were asked to submit consultation responses by 26/05/19.

## 1.2 The Proposed Development

- 6 Thanet Extension will have a total capacity of up to 340 MW and will include offshore and onshore infrastructure, including up to 34 Wind Turbine Generators (WTGs). The array area is located approximately 8 km north-east of the Isle of Thanet and covers an area of around 70 km<sup>2</sup> (approximately 59 km<sup>2</sup> outwith the SEZ) surrounding the existing Thanet Offshore Wind Farm. The Offshore Export Cable Corridor (OECC) extends from the south-western boundary of the array towards Pegwell Bay on the Kent coast, where export cables will make landfall. The OECC is approximately 20 km in length.
- 7 Other offshore components of the wind farm may include:
- An offshore substation (OSS) and associated foundations;
  - Inter-array cables between turbines;
  - Concrete mattresses or other protective measures associated with cable crossings; and
  - Scour protection measures around the bases of foundations.
- 8 Electricity will be transmitted via High Voltage Alternating Current (HVAC) cables to an onshore substation at Richborough, which will in turn connect to an existing National Grid substation at Richborough Energy Park. The onshore section of the cable corridor will be approximately 2.5 km in length.
- 9 The proposed development (including the SEZ) is illustrated in Figure 1.

## 1.3 Purpose of this Document

- 10 The purpose of this document is to set out the consultation responses received to the Applicant's request for a material change, the scope and nature of this consultation, the main issues raised, and the Applicant's response (where necessary).
- 11 There are a number of documents annexed to this document as follows:
- Annex A: Copy of the consultation notification letter sent to consultees;
  - Annex B: Copy of the consultation notification email sent to consultees;
  - Annex C: List of consultees and consultation tracker (including confirmation as to whether they were notified by email or post, and whether a response was received. Copies of email delivery/read receipts are held by the Applicant and are available on request.);
  - Annex D: Copies of responses received from consultees; and

- Annex E: The Applicant's response to the joint consultation response submitted by the Port of London Authority and Estuary Services Ltd.

12 There is also a suite of documents relevant to the proposed material change that have been submitted at previous Examination deadlines which are not annexed.

#### 1.4 The Proposed Material Change

13 The material change introduces an SEZ within the proposed Order Limits (also termed the 'red line boundary') in order to ensure that no part of any structure (including WTGs, the OSS, the meteorological mast, wave buoys or floating LiDAR) can be placed in this area.

14 The SEZ delineates this area within the Order Limits, which will be specifically defined within the draft DCO and demarcated on offshore works plan(s). The SEZ is illustrated in Figure 1.

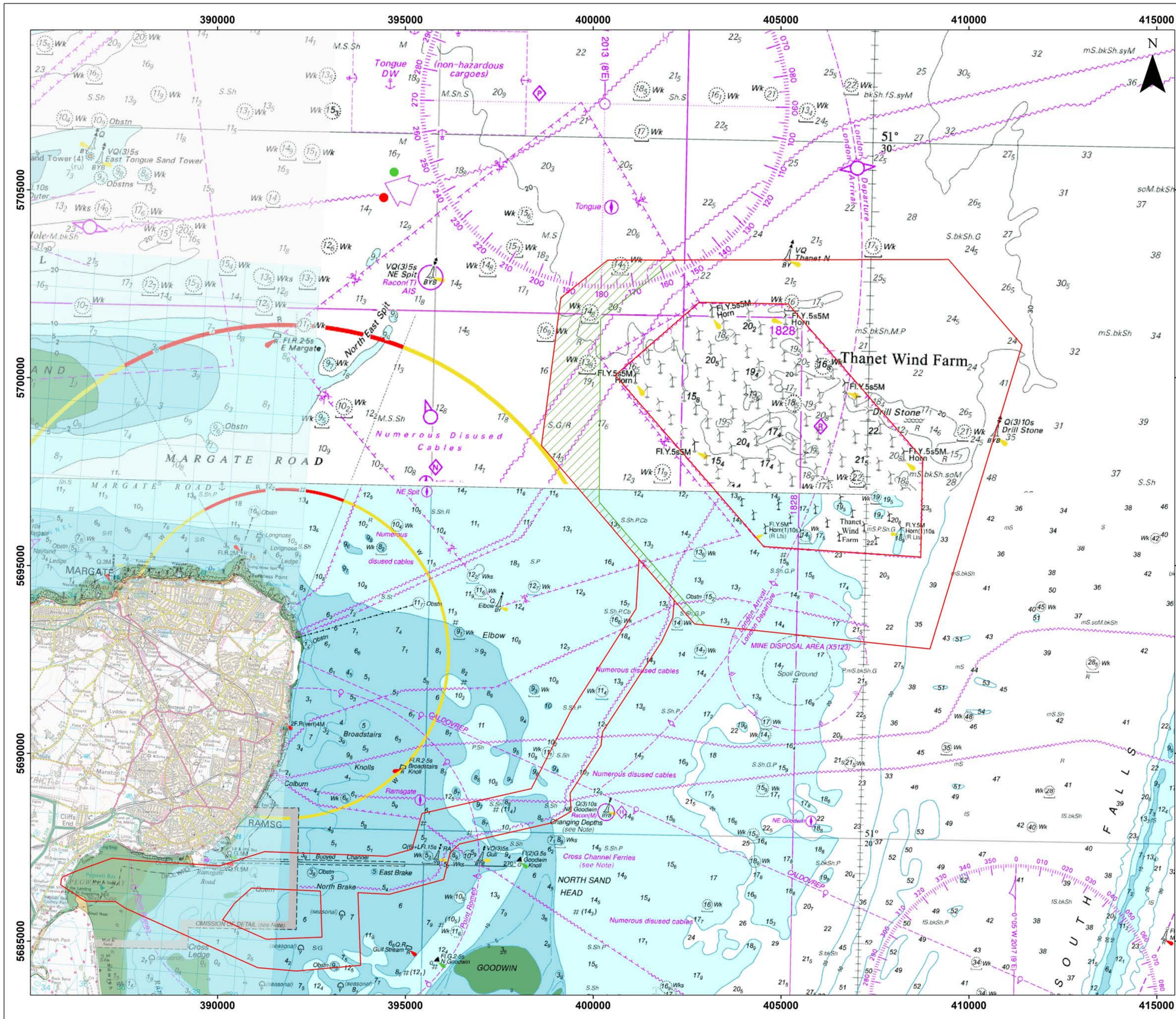
15 The SEZ has been proposed specifically in response to concerns over navigable sea room and navigational safety from shipping and navigation consultees.

16 The Applicant considered whether the change should be regarded as material by referring to PINS Advice Note 16 'How to request a change which may be material' in order to determine the scope of consultation to be carried out. This conclusion '*may be based on criteria including, for example, whether the change would generate a new of different likely significant environmental effect(s). Similarly, whether (and if so the extent to which) a change request involved an extension to the Order land*'.

17 The SEZ does not affect the Order Limits and only reduces the extent of infrastructure and therefore is not a material change on this basis. It could, however, be considered a material change based on the potential changes to environmental effects as assessed in the ES. The Applicant therefore considered the SEZ to represent a material change, but not to the extent that it leads to a materially different project.

18 On 09/04/19, the Examining Authority then provided a procedural decision, by way of a variation to the Rule 8 letter, confirming that the proposed change had been accepted as a material change into the Examination process.

19 In Appendix 23 of the Deadline 4 Submission [REP4-027], it was identified in a review of the ES and RIAA that the implementation of the SEZ would have no material effect (screened out), or would have a net benefit on, all receptors.



# THANET EXTENSION OFFSHORE WIND FARM

## Thanet Extension Red Line Boundary and SEZ

### Legend

- Order Limits
- Structures Exclusion Zone

Datum: ETRS 1989  
Projection: UTM 31N



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Scale @ A1 - 1:50,000 0 1.5 3 km

Drg No	TEOW_RLBandSEZ		
Rev	A	Date	23/05/2019
By	RM	Check	SL



## 2 Scope of Consultation

### 2.1 Notification to the ExA

20 The Applicant notified the ExA of the SEZ and that it could be considered a material change in its covering letter of the Applicant's Deadline 4 Submission (submitted 28/03/19). The ExA required that the Applicant submit documentation to support this by Deadline 4b (05/04/19), of which the ExA confirmed receipt in their updated Rule 8 letter. A summary of the Material Change Documentation is given below:

- A Navigation Risk Assessment (NRA) addendum;
- A review of other Application Documents;
- An addendum to the Environmental Statement;
- Other documents supporting the SEZ:
  - An addendum to the Report to Inform Appropriate Assessment (RIAA);
  - Revised Crown Land Plan;
  - Revised Extinguishment of Public Rights of Navigation Plan; and
  - Revised Radar Line of Sight Plan.
- Updated Guide to the Application; and
- Revised draft DCO.

### 2.2 Procedural Decision on the Material Change

21 On 09/04/19, the ExA made a Procedural Decision to accept the material change into the Examination process. In doing so, the ExA also amended the Examination timetable to ensure that IPs already participating in the Examination were aware of the material change and would have the opportunity to comment.

### 2.3 Updated Rule 8 Letter and Section 51 Advice

22 In its updated Rule 8 letter, the ExA provided the Application with advice under Section 51 of the Planning Act 2008 about the procedural consequences of the material change for persons who were not already involved in the Examination, asking the Applicant to notify and consult with those persons for a period of no less than 30 days, and to notify them of their opportunity to participate in the Examination at Deadline 6. The ExA also requested that the Applicant produce a report on the material change consultation process and the responses received by Deadline 6.

- 23 The Applicant set out its response to the Section 51 advice at Issue Specific Hearing 8 (see Appendix 12 to the Deadline 5 Submission [REP5-018]).

### Publicity and Consultation Processes

- 24 The ExA requested that the Applicant publicise the SEZ Material Change documents providing an analogue to all processes required by:
- The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (APFP 2009), particularly Regulation 4; and
  - The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations 2017), particularly Regulation 22.
- 25 In response to the above, the Applicant noted that these provisions essentially address circumstances where there is a new proposed application or a subsequent application, which is not that case with the proposed material change. The Applicant did not consider that full compliance with all aspects of those regulations were necessary or proportionate in this instance. The Applicant described that the SEZ is a measure proposed to address specific concerns raised by stakeholders in the context of an existing application. In this case, it is necessary to bear in mind Advice Note 16, which identifies that a targeted approach may be adopted as to the identification of those affected by the request for a material change. The advice also refers to proportionate additional non-statutory consultation.
- 26 The Applicant notes that the proposed change is entirely offshore and that there is no addition or change to the underlying substance of the proposed scheme (the design envelope has not increased), and no new or additional environmental effects are anticipated. In addition, all parties interested in issues relating to the original, more extensive, scheme have already had the opportunity to comment and participate in the examination process. In that regard, the Applicant considered that it would be proportionate to not meet the full requirements of those regulations identified in paragraph 23 above.
- 27 The Applicant provided a full response on these matters and explained the rationale for their approach at the beginning of Issue Specific Hearing 8 of the Examination.
- 28 The ExA also advised that the timescale for consultation must be analogous to that described within the EIA Regulations 2017 Regulation 22(3)(f)(iii), with the deadline for responses being no less than 30 days following the date when the relevant consultee received the notice. Consultees were given a period of 32 days (inclusive of 25/04/19 to 26/05/19) to respond (in excess of the minimum 30-day consultation period).

## Opportunity for Consultees to Request to Participated in the Examination

- 29 The ExA requested that the Applicant provide all consultees with a link to the revised Rule 8 letter and advise them that if they are not already involved in the Examination that they may submit a request to become an IP or OP in the Examination, and that they may also provide a statement of submissions in response to the Applicant's SEZ Material Change consultation package.
- 30 A list of IPs who should be consulted was provided at Annex B of the Rule 8(3) letter from the ExA On 04/04/19. The Applicant considered this list appropriate and, for completeness, included a number of other interested persons whose remit relates to offshore matters in varying capacities. This list also included a number of bodies recommended by the Examining Authority at Issue Specific Hearing 8. This updated list of consultees was provided to the ExA at Appendix 1 of the Deadline 4c Submission, and the Applicant also suggested that it was not proportionate or necessary to consult with persons beyond this list. The full list of consultees can be found at Annex C of this document.
- 31 The consultation information was described in the consultation notification sent to consultees via post (Annex A) and email (Annex B).

## Consultation Report

- 32 The ExA requested that the Applicant prepare a Consultation Report that should record:
- The dates and time periods of publicity and consultation for the SEZ Material Change (this is described in paragraph 26 and paragraph 31 of this document);
  - Copies of all notices served and lists of persons to whom notice has been sent (copies of the letter and email sent to consultees can be found at Annex A and Annex B of this document and a list of consultees can be found at Annex C of this document);
  - Proof of publication of notices required to be published (copies of the letter and email sent to consultees can be found at Annex A and Annex B of this document. As described in paragraphs 24 and 25 the Applicant concluded that it would be proportionate to not meet the full requirements regarding publication of notices);
  - A list of all responses to the consultation (this can be found in Table 1 of this document); and
  - A list of issues raised on responses to the consultation and the Applicant's response to those issues (this can be found in Table 1 of this document).

## 2.4 Consultation Process

### Overview

- 33 The consultation exercise has been Applicant led, starting on 25/04/19 and ending on 26/05/19. As described in paragraph 16 *et seq.*, the Applicant has reviewed PINS Advice Note 16 to determine the scope of consultation to be carried out. Consultees were given a period of 32 days (inclusive of 25/04/19 to 26/05/19) to respond (in excess of the minimum 30-day consultation period).
- 34 The Applicant sent a total of 37 letters and 38 emails (no postal address was identified for London Pilot's Council) to the 38 consultees listed in Table 1 and Annex C of this document. In the letter, consultees were briefed on the nature of the material change and provided links to the ExA's Procedural Decision letter and its annexes, the package of consultation documents produced by the Applicant, and the PINS Examination Documents page.
- 35 The consultation letter sent to Rederscentrale (Belgian fishing association) was returned to sender after being unsuccessfully delivered by post in Belgium. A further search did not reveal any other contact details and the email version of consultation notification was successfully delivered. Therefore, the Applicant concluded that no further action was required.
- 36 A postal return was also received from Historic England's Guildford postal address however it was confirmed in a tele-conference with Historic England on 22/05/19 that they had received the email notification and had been made aware of the consultation, and therefore no further action was deemed necessary.
- 37 A postal return was also received from NATS, however they had already responded to consultation indicating that they had no further comment to make, and so it was clear that they had received notification of consultation via email and no further action was deemed necessary.

### Consultation Materials

- 38 Consultees were given contact details to provide their responses to (by post or email) and were provided with a link to the consultation documents made available on the project website. The consultation letter also contained links to the updated Rule 8(3) letter and the Thanet Extension documents webpage.

- 39 Consultees were also advised that hard copies of the consultation package could be requested at a cost of £200, or hard copies of individual documents. A USB drive of the consultation documents could also be requested by consultees.
- 40 The consultation documents comprised:
- Structures Exclusion Zone Explanatory Report;
  - Review of the Environmental Statement and Report to Inform Appropriate Assessment in relation to the Structure Exclusion Zone;
  - Revised Offshore Works Plan;
  - Addendum to Navigation Risk Assessment (and associated annexes);
  - An addendum to the Environmental Statement (ES) assessing the SEZ proposal;
  - Review of Application Documents with regards to the Structures Exclusion Zone;
  - The consequences of the SEZ on the assessment of the Outer Thames Estuary and Flamborough and Filey Coast SPAs;
  - Implications of the SEZ – Seascape, Landscape and Visual Effects;
  - Implications of the SEZ – Seascape, Landscape and Visual Effects – Wirelines;
  - Structure Exclusion Zone – Onshore Heritage;
  - Assessment of the implications of the implementation of the Structures Exclusion Zone in relation to commercial fisheries; and
  - Shipping and Navigation Statement of Evidence and Accompanying Figures.

### 3 Responses Received and the Applicant's Responses

- 41 The responses received from consultees are set out in Table 1 along with the Applicant's responses. Copies of correspondence from each consultee are included in Annex D to this report.
- 42 A total of 8 responses (including a joint response from the Port of London Authority and Estuary Services Ltd (PLA & ESL) and a joint response the Port of Tilbury London Ltd and London Gateway Port Ltd (PoTLL & LGP)) were received from out of the list of consultees contacted and those of substance were from Shipping and Navigation related IPs. Only one substantive response was received (PLA & ESL), which is specifically addressed in Annex E to this document. Other responses indicated that stakeholders would not be responding specifically to the consultation but would continue to engage with the wider Examination process.
- 43 Responses from non-shipping consultees indicated no comment on the proposed material change to Thanet Extension.
- 44 National Grid were not identified as a stakeholder to be contacted but submitted a response (indicating no comment).
- 45 Thirty consultees did not respond, and it is considered that these stakeholders had no comment to make on the proposed material change.

**Table 1: Applicant responses to consultation responses on the material change (SEZ).**

Consultee	Consultee Response	Applicant Response	Further Action
Britned Development Ltd	Did not submit a response.	N/A	N/A
Chamber of Shipping	Did not submit a response.	N/A	N/A
Comité National des Pêches Maritimes et des Elevages Marins	Did not submit a response.	N/A	N/A
Dover District Council	Did not submit a response.	N/A	N/A
DP World London Gateway	<p>Joint response on behalf of Port of Tilbury London Ltd and London Gateway Port Ltd.</p> <p>“We write on behalf of Port of Tilbury London Limited and London Gateway Port Limited (the Ports) in response to the above consultation being carried out by Vattenfall Wind Power Limited.</p> <p>We have reviewed the consultation materials provided. As you know, the two Ports are actively engaged in the Examination of the proposed Thanet Offshore Wind Farm Extension DCO and as such will be providing comments in respect of the Structures Exclusion Zone (SEZ) to the Examining Authority through that process. The Ports have already made</p>	<p>This is noted and welcomed by the Applicant. The Applicant will continue to engage with the Ports of Tilbury and London Gateway through the Examination process.</p>	N/A

Consultee	Consultee Response	Applicant Response	Further Action
	representations in respect of the SEZ and will make further representations at the final examination Deadlines.”		
Estuary Services Limited, General Manager	<p>Covering letter can be found in Annex D of this Consultation Report.</p> <p>See Annex E to this Consultation Report which incorporates the response table appended to their submission for point by point responses.</p>	See Annex E to this Consultation Report.	Substantial joint submission received from Port of London Authority and Estuary Services Ltd. The Applicant has had regard to this response in Annex E to this report, in which a point by point response is given.
Estuary Services Limited, Operations Manager	<p>Covering letter can be found in Annex D of this Consultation Report.</p> <p>See Annex E to this Consultation Report which incorporates the response table appended to their submission for point by point responses.</p>	See Annex E to this Consultation Report.	Substantial joint submission received from Port of London Authority and Estuary Services Ltd. The Applicant has had regard to this response in Annex E to this report, in which a point by point response is given.
GridLink Interconnector	Did not submit a response.	N/A	N/A
Historic England	Did not submit a response.	N/A	N/A



Consultee	Consultee Response	Applicant Response	Further Action
Kent and Essex Inshore Fisheries Conservation Authority	Did not submit a response.	N/A	N/A
Kent County Council	Did not submit a response.	N/A	N/A
Kent Wildlife Trust	Did not submit a response.	N/A	N/A
Licence Holder (Chapter 1 of Part 1 of Transport Act 2000) – NATS En-Route Safeguarding	“As there have been no material changes to the locations or heights of the turbines, NATS anticipates no impact from the SEZ and its position of NO OBJECTION remains unchanged.”	This is noted and welcomed by the Applicant.	N/A
London Pilots Council	Did not submit a response.	N/A	N/A
Manston Airport	Did not submit a response.	N/A	N/A
Maritime and Coastguard Agency	”Thank you for the opportunity to comment on the material change to the Thanet Extension Offshore Windfarm Project. The MCA will be providing its comments on the amendment, which introduces a Structures Exclusion Zone, as part of our representation through the examination phase of the application via the Planning Inspectorate.”	This is noted and welcomed by the Applicant.	N/A
Ministere de l'ecologie, du developpement durable et de l'energie	Did not submit a response.	N/A	N/A

Consultee	Consultee Response	Applicant Response	Further Action
Ministry of Defence	"In relation to notification received from Vattenfall regarding the above, I can confirm after review that the MOD have no comments to make."	This is noted and welcomed by the Applicant.	N/A
Marine Management Organisation	"Re: the material change request consultation for the SEZ which closes this Sunday 26 May. I can confirm following consultation that the MMO does not have any specific issues to raise in respect of the proposed change. We will be including an expanded response in our deadline 6 submission to the ExA on Tuesday, however I trust this will assist your reporting in the meantime."	This is noted and welcomed by the Applicant. The Applicant will continue to engage with the MMO through the Examination process.	N/A
National Grid	"Further to your letter dated 25th April 2019 regarding Deadline 4 and the material change. National Grid has no comments to make on this."	This is noted and welcomed by the Applicant.	N/A
National Trust	Did not submit a response.	N/A	N/A
Natural England	Did not submit a response.	N/A	N/A
Nemo Link Limited	Did not submit a response.	N/A	N/A
Pan-European Crossing (UK Belgium)	Did not submit a response.	N/A	N/A
Port of London Authority	Covering letter can be found in Annex D of this Consultation Report.  See Annex E to this Consultation Report which incorporates the response table	See Annex E to this Consultation Report.	Substantial joint submission received from Port of London Authority and Estuary Services Ltd. The

Consultee	Consultee Response	Applicant Response	Further Action
	appended to their submission for point by point responses.		Applicant has had regard to this response in Annex E to this report, in which a point by point response is given.
Port of Sheerness	Did not submit a response.	N/A	N/A
Port of Tilbury	<p>Joint response on behalf of Port of Tilbury London Ltd and London Gateway Port Ltd.</p> <p>“We write on behalf of Port of Tilbury London Limited and London Gateway Port Limited (the Ports) in response to the above consultation being carried out by Vattenfall Wind Power Limited.</p> <p>We have reviewed the consultation materials provided. As you know, the two Ports are actively engaged in the Examination of the proposed Thanet Offshore Wind Farm Extension DCO and as such will be providing comments in respect of the Structures Exclusion Zone (SEZ) to the Examining Authority through that process. The Ports have already made representations in respect of the SEZ and will make further representations at the final examination Deadlines.”</p>	<p>This is noted and welcomed by the Applicant.</p> <p>The Applicant will continue to engage with the Ports of Tilbury and London Gateway through the Examination process</p>	N/A
Rederscentrale	Did not submit a response.	N/A	N/A

Consultee	Consultee Response	Applicant Response	Further Action
Royal Society for the Protection of Birds	Did not submit a response.	N/A	N/A
Royal Yachting Association	Did not submit a response.	N/A	N/A
Tangerine	Did not submit a response.	N/A	N/A
Thanet Fishermen's Association	Did not submit a response.	N/A	N/A
Thanet District Council	Did not submit a response.	N/A	N/A
Thanet Offshore Wind Farm Export Cable (OFTO)	Did not submit a response.	N/A	N/A
Civil Aviation Authority	Did not submit a response.	N/A	N/A
The Crown Estate	Did not submit a response.	N/A	N/A
The Environment Agency	Did not submit a response.	N/A	N/A
The Planning Inspectorate	Did not submit a response.	N/A	N/A
Trinity House Lighthouse Service	<p>"I can confirm that Trinity House will make representations on this material change by continuing to participate actively in the ongoing PINS examination process.</p> <p>We do not intend submitting any other separate comments in relation to this matter."</p>	<p>This is noted and welcomed by the Applicant. The Applicant will continue to engage with THLS in the wider Examination process.</p>	N/A

## 4 Summary and Conclusions

- 46 The Applicant has carried out consultation with consultees on the proposed material change to the Application (the SEZ). A total of 8 responses (including 2 joint responses) were received out of a total of 38 consultees contacted. Only one of these responses was substantive (PLA & ESL), with the remaining respondents indicating either that they had no comment on the SEZ Material Change, or that they would continue to engage with and respond during the wider Examination process.
- 47 The PLA & ESL response is specifically addressed in Annex E to this report, in which the Applicant provides a point by point response to concerns raised. The PLA and ESL's concerns raise concerns regarding navigational safety and the reduction of navigable sea room, and the Applicant, in addition to responding to those concerns in Annex E, will continue to engage with PLA and ESL during the Examination.
- 48 The only substantive response (PLA & ESL), as well as the response from POTLL & LGP which indicated that they would be responding at the next Examination deadline, were related to shipping and navigation, as expected. The lack of responses from non-shipping and navigation stakeholders, and the low number of responses in general, indicates that there is limited interest in the proposed material change outside of shipping and navigation, highlighting that this proposal will not contribute to any new significant environmental effects and that non-shipping stakeholders are content or indifferent towards the SEZ.