

**From:** Vrees, Leo de (ZD) [mailto:leo.de.vrees@rws.nl]  
**Sent:** 17 September 2018 16:32  
**To:** Norfolk Vanguard  
**Cc:** Martins Dias, Luis (WVL); Vries, Hans JG de (WVL); Minnaar, Ron (ZD)  
**Subject:** RE: transboundary notification for Norfolk Vanguard Offshore Wind Farm.

Dear Sirs

Thank you very much for sending us the transboundary notification for Norfolk Vanguard Offshore Wind Farm.

We read it with interest.

When going through the documents, we noted that in Chapter 13, Offshore Ornithology: "The ES concludes no significant effects on offshore ornithology. The fact that non-UK wind farms had not formed part of the cumulative assessment was raised by Rijkswaterstaat in the Netherlands as a potential concern over transboundary impacts on ornithology receptors. However, the ES states that the scale of **operational offshore** wind farms in Belgium, Netherlands and Germany is such that their inclusion would be very unlikely to alter the conclusions."

This remark gives raise for concern. Indeed, the operational offshore wind parks are limited. But considering the approved plans for wind parks by Belgium, Netherlands and Germany and the fact that Norfolk Vanguard will probably be built in the period after 2023 (we noticed that the cables for Norfolk Vanguard will be laid at sea in the period 2023-2027), this statement is no longer true. In the Netherlands, the area Borssele (on the border with Belgium) will be operational with 1,4 GW before that date. In front of the Dutch coast, another two areas will be operational with 2,1 GW before 2023 (Hollandse Kust South and North). This is all according to the present Roadmap (Routekaart 2023, see <https://www.noordzeeloket.nl/en/functions-and-use/offshore-wind-energy/routekaart/>)

And after that year, in 2024, Hollandse Kust West will be built, according to Routekaart 2030 with another 1,4 GW or more.

In the EC guidance document on Wind Energy Developments and Natura 2000 (2011) it is stated that other plans and projects to be considered include those that already have been completed, those that are approved by the planning authorities, or those that are currently undergoing planning approval.

We would therefore like to see that in the accumulation of impacts on birds, not only the existing wind farms are incorporated in the analysis but also the ones which are licensed and approved by official Government Policy. This may not necessarily lead to another conclusion but we believe the approach used for the assessment of accumulation of impacts should consider all relevant projects.

If needed, we are ready to provide you with more detailed information with regard to the planning of wind parks in the Dutch EEZ.

Yours sincerely

Leo de Vrees  
North Sea Coordinator

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Senior adviseur/senior advisor

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