

From: [Reed, Rebecca \(MMO\)](#)
To: [Norfolk Vanguard](#)
Cc: DCO/2016/00002@marinelicensing.marinemanagement.org.uk
Subject: Norfolk Vanguard Project (EN010079) - Rule 6 MMO Response
Date: 03 December 2018 15:57:03
Attachments: [REDACTED]

Norfolk Vanguard Project – EN010079

Identification Number: 20012773

Please find the MMO response to the Rule 6 letter.

The MMO will not be attending the preliminary meeting on Monday 10 December 2018.

Kind Regards
Rebecca Reed

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MMO reference:
DCO/2016/00002

Planning Inspectorate
Reference: EN010079
Identification Number:
20012773

03 December 2018

Dear Karen Ridge

Planning Act 2008 (as amended), Section 88 and the Infrastructure Planning (Examination Procedure) Rules 2010 (as amended) Rule 6

On 9 November 2018, the Marine Management Organisation (MMO) received the Rule 6 letter notice under section 88 of the Planning Act 2008 for invitation to preliminary meeting and proposed timetable for examination of the application for Norfolk Vanguard Offshore Wind Farm (OWF).

Please find the MMO's response for your consideration outlined below:

1. Preliminary Meeting

The MMO will **not** be attending the Preliminary Meeting on Monday 10 December 2018. However the MMO has reviewed the draft timetable for the examination of the application and would like to highlight the following concerns for consideration by the Examining Authority (ExA).

With regard to the examination timetable the MMO have concerns with the overlap across 3 projects with competing deadlines and hearing attendance. Norfolk Vanguard Extension examination process is running concurrently with Thanet Extension (EN010084), the process is only one day apart, this along with the Hornsea Three (EN010080) examination process already underway creates pressures on the time to travel to each hearing and sub sequential deadlines. The MMO and its specialist advisors, Centre for Environment, Fisheries and Aquaculture Science (Cefas) have individuals providing specialist advice working to all three above projects in the examination process and is concerned that it will not be possible to participate fully in all three examinations and provide the detailed responses required. The MMO would like to make the following suggestions to the proposed timetable:

- 1.1. The MMO requests the issue specific hearings (ISH) hearings are organised to minimise the need for MMO to be in attendance, (e.g. into offshore matters and onshore matters). This would benefit travel arrangements and resources with better utilised time, allowing for an efficient and effective examination.
- 1.2. The MMO notes that deadline 1 for Norfolk Vanguard is placed over the Christmas period, where the organisation experiences reduced resource capacity to respond. Deadline 1 also coincides with deadline 1 for Thanet Extension. Given this, combined with the resource constraints set out above, the MMO requests that the ExA considers a two week extension to Norfolk Vanguard deadline 1.

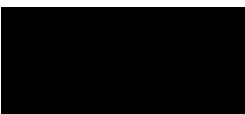


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- 1.3. There is also an overlap with the Hornsea Project 3 (ISH) 5 and 6, with Norfolk Vanguard ISH 1 and 2. These hearings occur on the same days in different cities. Given the time of year with potential travel issues, staff resources and the volume of work, there is little contingency within the MMO to deal with unforeseen staffing issues or provide additional support with expert advice where required. This issue, compounded by time constraints relating to deadline one, means the MMO may find it difficult to participate as fully as the MMO would wish for the Norfolk Vanguard Project.
- 1.4. Furthermore, any in-combination deliberations for Hornsea 3 could influence MMO's responses to the Norfolk Vanguard examination, and there will be little time to assimilate the evidence from one project into responses for the other. The MMO believes the impact could potentially be reduced if the ExA would consider an extension to deadline 1 for Norfolk Vanguard with resulting adjustments to subsequent hearings.
- 1.5. Deadline 3 of Norfolk Vanguard, as currently given, is only 4 working days after the ISH 1-3. Given the potential need to consider any developments from the Hornsea 3 ISH with regard to in-combination impacts this is a challenging deadline. The MMO would like to request the ExA considers granting an extension to deadline 3 to alleviate the situation.
- 1.6. Currently, The MMO will be required to attend issue specific hearings from Tuesday 19 February 2019 to Thursday 21 February 2019 for Thanet Extension and also receiving Norfolk Vanguards ExA's second written questions on 20 February 2019. The MMO representatives are based in Newcastle upon Tyne and experience significant travel time to be able to attend the hearings. The MMO requests that the timetable is reviewed to optimise the time available for MMO to respond to the ExA's second written questions.
- 1.7. Deadline 8 for Norfolk Vanguard, as currently given, overlaps with Thanet Extension OWF Deadline 6. The MMO has just 15 working days to provide response on the draft DCO and final statement of common ground. The MMO requests that the ExA considers reviewing the timetables of the 2 projects together, along with Hornsea 3 which also overlaps with the above 2 projects at multiple points in order to maximise time between submissions and reduce conflicting deadlines where possible.
- 1.8. Deadline 9 for Norfolk Vanguard, as currently given, allows just 4 working days to review comments on the final draft DCO and provide a response. This deadlines also conflicts with deadline 7 for Thanet Extension. The MMO requests that the ExA considers whether any changes can be made to deadline 9 to allow the MMO sufficient time to provide a full and considered response.

Yours sincerely,



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