



Historic England

Norfolk Vanguard Project Team
The Planning Inspectorate
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Bristol BS1 6PN

Our ref: OWF/Vattenfall/Vanguard
Your ref: EN010079

Telephone [REDACTED]
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17th January 2019

Dear Sir/Madam,

**Norfolk Vanguard Offshore Wind Farm: Additional Submission
Examination Registration ID: 20012795**

Further to our advice to you, dated 16th January 2019, regarding our Written Representation and the Examining Authority's Initial Questions, we have noticed a further matter associated with the draft Development Consent Order which requires your attention. We therefore hope that you will accept this correspondence.

We hereby offer the following advice in reference to the draft Development Consent Order (PINS Document reference 3.1, dated June 2018).

Part 1 (Preliminary), Article 2(1) (Interpretation):

“commence” means, (a) in relation to works seaward of MHWS, the first carrying out of any licensed marine activities authorised by the deemed marine licences, save for pre-construction surveys and monitoring approved under the deemed marine licences or, (b) in respect of any other works comprised in the authorised project, the first carrying out of any material operation (as defined in section 155 of the 2008 Act) forming part of the authorised project other than operations consisting of site clearance, demolition work, archaeological investigations, environmental surveys, investigations for the purpose of assessing ground conditions, remedial work in respect of any contamination or other adverse ground conditions, diversion and laying of services, erection of any temporary means of enclosure,



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temporary hard standing, the temporary display of site notices or advertisements and the words “commencement” and “commenced” must be construed accordingly;”

We hereby disagree with this definition and request that the term “commence”, as used in the draft Development Consent Order is amended to include pre-construction monitoring surveys and site preparation works.

We consider this to be an important matter for amendment to ensure the production, agreement and implementation of any archaeological Written Schemes of Investigation (WSI) occurs prior to initiation of project-related activities. In particular, crucial components of the proposed project, namely:

“...site clearance, demolition work, archaeological investigations, environmental surveys, investigations for the purpose of assessing ground conditions...”

The primary function of any WSI produced post-consent is to inform further survey programmes considered necessary to support delivery of the proposed development; and therefore should be appropriately informed about the risk of encountering known or unknown archaeological materials, onshore or offshore.

In our Written Representation we provided detailed advice about the importance of effective and efficient programme delivery (should consent be obtained) and we drew particular attention to the relationship between the Outline Written Scheme of Investigation (Offshore) (PINS Document Reference: 8.06) and the In Principle Monitoring Plan (offshore) (PINS Document reference: 8.12).

In conclusion, we request that this amendment is introduced Part 1, 2(1) to ensure adequate mitigation measures are implemented for site preparation works by using analysed and interpreted survey data, as necessary, to inform detailed design decisions. It is therefore relevant that should this definition be amended that a consistent approach is taken to all other definitions of “commence” as used in Schedules 9, 10, 11 and 12.

Yours sincerely,



Dr Christopher Pater
Head of Marine Planning

cc. Dr William Fletcher (Historic England, East of England)



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