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To: [Norfolk Vanguard](#)
Cc: [Fletcher, Will](#)
Subject: Norfolk Vanguard Project - EN010079
Date: 12 March 2019 17:41:07
Attachments: [2019-03-12_Historic England response to PINs_EN010079_Norfolk Vanguard Second Questions.pdf](#)

Dear Sir/Madam,

Please see our attached letter in response to the Examining Authority's further (second) written questions and requests for information, Issued on 27 February 2019.

Yours faithfully,

Christopher Pater (MSc, PhD)
Head of Marine Planning
Regions Group

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12th March 2019

Dear Sir/Madam,

Vattenfall Norfolk Vanguard Offshore Wind Farm: Second Written Questions Examination Registration ID: 20012795

Further to the issuing of the Examination Authorities Second Written Questions on 27th February 2019, we hereby offer the following response to questions that are either directed to Historic England or are otherwise closely associated with our responsibilities as Historic England.

Question 7.6 – directed to Historic England and MMO: Please provide an update on your discussions in relation to the wording of Condition 15(2) of the DML (Schedule 9-10) and Condition 10(2) of the Transmission DMLs (Schedules 11-12).

We have discussed this matter with the MMO and therefore the response we provided here is our agreed position that the wording of Condition 15(2) within:

- Schedule 9, Generation Assets DML (Licence 1 – Phase 1); and
- Schedule 10, Generations Assets DML (Licence 2 – Phase 2)

should be amended so that to submission for approval is at least six months prior to the intended commencement of licensed activities.

We add that within the Transmission DML, Condition 10(2) within:

- Schedule 11, Transmission Assets DML (Licence 1 – Phase 1); and
- Schedule 12, Transmission Assets DML (Licence 2 – Phase 2)



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should also be amended so that to submission for approval is at least six months prior to the intended commencement of licensed activities.

Furthermore, we add that it is important to ensure a consistent approach and a viable timetable for advice to be produced post-consent, should this project be successful in securing the required permissions, so we request that the following conditions:

- Schedule 9, Generation Assets DML (Licence 1 – Phase 1) – Condition 14(1)(h);
- Schedule 10, Generations Assets DML (Licence 2 – Phase 2) – Condition 14(1)(h);
- Schedule 11, Transmission Assets DML (Licence 1 – Phase 1) – Condition 9(1)(h); and
- Schedule 12, Transmission Assets DML (Licence 2 – Phase 2) – Condition 9(1)(h)

are amended as follows:

“An archaeological written scheme of investigation in relation to the offshore Order limits seaward of mean low water, which must be submitted at least eight months prior to commencement of the licensed activities and must accord with the outline written scheme of investigation (offshore) and industry good practice, in consultation with the statutory historic body (and, if relevant, North Norfolk District Council).”

We propose this amendment so that any post-consent WSI, produced in accordance with the outline WSI (offshore), is subject to consultation with Historic England within a viable timeframe prior to formal approval by the MMO six months before commencement, as defined. This should also allow for compliance with DML Condition 15(2) and 10(2)

Question 7.7 – Are you satisfied with the proposed 50m archaeological exclusion zone around A1 sites and magnetic only anomalies?

We are aware from the Environmental Statement, Volume 1, Chapter 17¹ (Offshore and Intertidal Archaeology and Cultural Heritage) and the Outline Written Scheme of Investigation (Offshore)² that “A1” anomalies were identified as follows:

- NV East – 5;
- NV West – 11;
- Offshore cable corridor – 26

The accompanying text of the *Outline Written Scheme of Investigation (Offshore)* (paragraph 18) defines “A1” features “...as being of archaeological interest, comprising wrecks, magnetic only buried anomalies and larger items of debris and debris fields”. It is apparent from the information provided that the features classified as “A1” can represent “substantial buried ferrous remains”, within sand-wave systems and that some of these wrecks were not previously charted. Therefore in regard to the proposed “embedded mitigation” strategy set out in Chapter 17 (section

¹ Document Reference: 6.1.17

² Document Reference: 8.6



17.7.2) that 50m AEZs are used around the extents of identified and/or known wreck sites (classified as “A1”) and 50m Archaeological Exclusion Zones (AEZs) are used around the point locations of “A1” magnetic only anomalies, we support this strategy of avoidance, such that no development related activities will take place within any identified “A1” AEZs.

It is also a relevant matter that we highlight our support for the inclusion of Offshore Archaeology and Cultural Heritage within the *In Principle Monitoring Plan*³ (see Table 4.6) and that any pre-construction surveys use surveying techniques inclusive of a 500m buffer area around the site of each proposed works and the investigation and identification of seabed features of known (“A1”) and potential (“A2”) archaeological interest within the survey area as relevant to the modification of agreed AEZs or adoption of new AEZs. However, the Outline Written Scheme of Investigation (Offshore) does not include any cross-reference to the *In Principle Monitoring Plan* – a matter which must be addressed post-consent as part of the preparation of the project-specific Written Scheme of Investigation (Offshore), as per DML conditions as identified above.

We also consider it a relevant matter that we highlight to you the proposed embedded mitigation for seabed anomalies classed as “A2”; defined as:

“...possible anthropogenic origin and have the potential to represent archaeological material on the seabed of maritime or aviation origin. Magnetic only anomalies (without visible surface expression) have the possibility to be buried objects with ferrous content that are of archaeological potential.”

It is therefore apparent that “A2” anomalies may include “debris field”, “seafloor disturbance” or “magnetic”; such that within the proposed development area the following “A2” anomalies are identified:

- NV East – 312;
- NV West – 172;
- Offshore cable corridor – 706

We are also aware that the identification of anomalies of possible archaeological interest (e.g. employing a classification scheme such as A1, A2 and A3 etc.) will probably be subject to revision, should consent be obtained, as the consented development area is re-surveyed at the necessary resolution for detailed design purposes.

We appreciate that other survey techniques, not employed for EIA preparation, might also be used as necessary to support delivery of the selected engineering design of the project (e.g. as dictated by the number and configuration of turbines, offshore substations and foundation type etc.). Therefore the timely preparation and consultation with Historic England of the Written Scheme of Investigation (Offshore) is an important stage prior to formal agreement with the MMO, so that avoidance is possible of identified anomalies either by informing the micro-siting of any works or further investigation of any anomalies of archaeological interest that cannot be avoided.

³ Document Reference: 8.12



Question 15.12 directed to Applicant and Historic England: “Please provide an update on your discussions regarding HE’s concerns raised in their letter dated 17 January 2019 in relation to the definition of ‘commence’”.

We confirm that we received correspondence from the Applicant (email dated 5th March 2019) regarding proposed text amendment within the draft Development Consent Order, Schedule 1 (authorised project), Part 3 (requirements), Condition 23 (archaeological written scheme of investigation), such that the text in 23(5) is amended to:

“Pre-commencement surveys, site preparation works and archaeological investigations must only take place in accordance with a specific written scheme of investigation...”

We hereby concur with the above text amendment proposed by the Applicant.

In reference to the draft Deemed Marine Licences such that within Condition 14(2)⁴ and 9(2)⁵ is amended to:

“Pre-commencement surveys and archaeological investigations and pre-commencement material operations which involve intrusive seabed works must only take place in accordance with a specific written scheme of investigation...”

We hereby concur with the above text amendment proposed by the Applicant.

Question 15.13 directed to Historic England: “Could you please provide a written response setting out your views with respect to the amended conclusions within the errata document on the impacts on the significance of heritage assets including the Grade I listed Church of St Andrew.”

Further to our evidence at the Issue Specific Hearing on 5th February 2019 we hereby confirm that the anticipated change introduced by the proposed development would amount to less than substantial harm to the Grade I listed Church of St Andrew.

Yours sincerely,



Dr Christopher Pater
Head of Marine Planning

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

⁴ Schedule 9 and 10 – Generation Assets (draft) Deemed Marine Licence (Licence 1 and 2 – Phase 1 and 2)

⁵ Schedule 11 and 12 - Transmission Assets (draft Deemed Marine Licence (Licence 1 and 2 – Phase 1 and 2)

