



Norfolk Vanguard Offshore Wind Farm

Checklist of East Inshore and Offshore Marine Plans Objectives

Appendix 1.1 (Q1.8)

Applicant: Norfolk Vanguard Limited

Document Reference: ExA; FurtherWQApp1.1; 10.D4.6

Deadline 4

Date: March 2018

Photo: Kentish Flats Offshore Wind Farm

Marine	Policy text	Policy	Norfolk Vanguard assessment of plan policy	Relevant Documents	Plan policy assessment
Plan Policy		screened in or out from MIS assessment			result
EC1	Proposals that provide economic productivity benefits which are additional to Gross Value Added currently generated by existing activities should be supported.		Norfolk Vanguard will support local and UK employment during construction, operation and decomissioning phases.	ES Chapter 31 Socio-economics	Policy has been considered and the Application is compliant
EC2	Proposals that provide additional employment benefits should be supported, particularly where these benefits have the potential to meet employment needs in localities close to the marine plan areas.	In	Norfolk Vanguard will support local and UK employment during construction, operation and decomissioning phases. To promote the development of long term local employment for Norfolk Vanguard, the applicant is developing a Skills Strategy to engage schools, colleges, and universities. The project has already started to employ local contractors wherever possible.	ES Chapter 31 Socio-economics	Policy has been considered and the Application is compliant
EC3	Proposals that will help the East marine plan areas to contribute to offshore wind energy generation should be supported.	In	This application is an offshore wind farm and therefore supports this policy	ES Chapter 31 Socio-economics	Policy has been considered and the Application is compliant
SOC1	Proposals that provide health and social well-being benefits including through maintaining, or enhancing, access to the coast and marine area should be supported.	In	One of the objectives of the Norfolk Vanguard site selection process was to avoid valuable natural assets such as the North Norfolk Coast Area of Outstanding Natural Beauty (AONB). This allowed the avoidance of corresponding clusters of tourism and recreation assets. In addition, and in response to consultation with stakeholders, a horizontal drilling design has been developed that will not require closure of either the coastal footpaths or the beach.	ES Chapter 30 Tourism and Recreation	Policy has been considered and the Application is compliant
SOC2	Proposals that may affect heritage assets should demonstrate, in order of preference: a) that they will not compromise or harm elements which contribute to the significance of the heritage asset b) how, if there is compromise or harm to a heritage asset, this will be minimised c) how, where compromise or harm to a heritage asset cannot be minimised it will be mitigated against or d) the public benefits for proceeding with the proposal if it is not possible to minimise or mitigate compromise or harm to the heritage asset	In	The existing offshore and intertidal archaeological baseline has been established through a desk-based assessment and a review of offshore archaeological survey data. The known offshore archaeological baseline comprises charted wrecks and obstructions and previously unidentified anomalies of possible maritime or aviation origin. The approach to mitigation is to avoid these features via Archaeological Exclusion Zones and micro-sting where possible. In order to account for unexpected archaeological finds, a formal protocol for archaeological discoveries will be implemented during construction through the Written Scheme of Investigation.	ES Chapter 17 Offshore Archaeology and Cultural Heritage Outline Written Scheme of Investigation (Offshore) (document 8.6)	Policy has been considered and the Application is compliant
SOC3	Proposals that may affect the terrestrial and marine character of an area should demonstrate, in order of preference: a) that they will not adversely impact the terrestrial and marine character of an area b) how, if there are adverse impacts on the terrestrial and marine character of an area, they will minimise them c) how, where these adverse impacts on the terrestrial and marine character of an area cannot be minimised they will be mitigated against d) the case for proceeding with the proposal if it is not possible to	In	The ES considers historic seascape character and concludes that effects on the baseline setting is already influenced by existing gas rigs and passing shipping vessels, therefore reducing the sensitivity and potential magnitude of change. The ES also considers landscape character and visual amenity. Any impacts from the offshore infrastructure of Norfolk Vanguard on onshore/coastal receptors was scoped out of the Landscape and Visual Impact Assessment owing to the distance of these works offshore. This approach was agreed with the Secretary of State (SoS) via the Scoping Opinion in November 2016.	ES Chapter 17 Offshore Archaeology and Cultural Heritage ES Chapter 29 LVIA Norfolk Vanguard	Policy has been considered and the Application is compliant
ECO1	Cumulative impacts affecting the ecosystem of the East marine plans and adjacent areas (marine, terrestrial) should be addressed in decision-making and plan implementation.	In	Cumulative impacts, both with other offshore wind farms in the region and with other marine and terrestrial developments have been considered and where appropriate, additional mitigation has been included in the application	ES chapters 8 to 31 with the following chapters providing a summary: - ES Chapter 32 Offshore Cumulative and Transboundary Assessment - ES Chapter 33 Onshore Cumulative	Policy has been considered and the Application is compliant
ECO2	The risk of release of hazardous substances as a secondary effect due to any increased collision risk should be taken account of in proposals that require an authorisation.	In	The application considers risks to marine water and sediment quality during all phases of development of the Norfolk Vanguard Offshore Wind Farm, and measures to be taken to minimise collision risk with other vessels and infrastructure are included within the NRA.	ES Chapter 09 Marine Water and Sediment Quality ES Chapter 15 Shipping and Navigation ES Appendix 15.1 Navigation Risk	Policy has been considered and the Application is compliant
	Appropriate weight should be attached to biodiversity, reflecting the need to protect biodiversity as a whole, taking account of the best available evidence including on habitats and species that are protected or of conservation concern in the East marine plans and adjacent areas (marine, terrestrial).		The ES considers impacts to marine and terrestrial ecology and identifies mitigation to protect species and habitats where appropriate. In addition, the Information to Support HRA report provides the assessment of effects on European designated sites.	ES Chapter 10 Benthic and Intertidal Ecology ES Chapter 11 Fish and Shellfish Ecology ES Chapter 12 Marine Mammals ES Chapter 12 Marine Mammals ES Chapter 13 Offshore Conithology ES Chapter 22 Onshore Ecology ES Chapter 23 Onshore Ornithology Information to Support HRA	Policy has been considered and the Application is compliant
	Where appropriate, proposals for development should incorporate features that enhance biodiversity and geological interests.	Out	Current advice from stakeholders is that effects cannot be considered beneficial in the marine environment, such as the addition of infrastructure that could become colonised. Therefore it is not possible/appropriate to enhance biodiversity. Impacts on biodiversity will be minimised where possible and mitigation has been identified in the ES.	N/A	Policy N/A to application
MPA1	Any impacts on the overall Marine Protected Area network must be taken account of in strategic level measures and assessments, with due regard given to any current agreed advice on an ecologically coherent network	In	The Information to Support HRA report provides the assessment of effects, including in-combination effects on relevant Marine Protected Areas and identifies mitigation measures where appropriate. Any further strategic level measures and assessments is a matter for the Regulator and advisors.	Information to Support HRA (document 5.3)	Policy has been considered and the Application is compliant

CC2	Proposals should take account of: • how they may be impacted upon by, and respond to, climate change over their lifetime and • how they may impact upon any climate change adaptation measures elsewhere during their lifetime Where detrimental impacts on climate change adaptation measures are identified, evidence should be provided as to how the proposal will reduce such impacts. Proposals for development should minimise emissions of greenhouse gases as far as is appropriate. Mitigation measures will also be encouraged where emissions remain following minimising steps. Consideration should also be given to emissions from other activities or users affected by the proposal.		The site selection and project design of Norfolk Vanguard has taken account of the effects of climate change, such as sea level rise. A summary of the Considerations of EN-1 Climate Change Policy in the application was provided at Deadline 3 (document reference ExA;ISH;10.D3.1D) As an offshore wind farm, the application would make a significant contribution to the achievement of UK decarbonisation targets by generating low carbon, renewable electricity. As an offshore wind farm, the application would make a significant contribution to the achievement of UK decarbonisation targets by generating low carbon, renewable electricity. Localised emissions associated with the development are assessed in the ES and concluded to be non-significant	ES Chapter 2 Need for the Project ES Chapter 4 Site Selection and Assessment of Alternatives Chapter 5 Project Description Chapter 8 Marine Geology Oceanography and Physical Processes Considerations of EN-1 Climate Change Policy in the application (document reference ExA;ISH;10.D3.1D) ES Chapter 2 Need for the Project ES Chapter 26 Air Quality	Policy has been considered and the Application is compliant Policy has been considered and the Application is compliant
GOV1	Appropriate provision should be made for infrastructure on land which supports activities in the marine area and vice versa.	In	The application includes all required infrastructure associated with Norfolk Vanguard, namely offshore wind turbines, offshore electrical platforms, offshore accommodation platforms, offshore export cables, array cables, landfall works, onshore cables, an onshore project substation and an extension to the existing National Grid substation at Necton, including associated overhead line modification works.	ES Chapter 5 Project Description	Policy has been considered and the Application is compliant
GOV2	Opportunities for co-existence should be maximised wherever possible	ln	Consultation has been undertaken with all relevant third parties who may interact with the offshore or onshore works and mitigation has been identified where appropriate to maximise the opportunity for co-existence	Statements of Common Ground (SOCG) Outline Fisheries Liaison and	Policy has been considered and the Application is compliant
GOV3	Proposals should demonstrate in order of preference: a) that they will avoid displacement of other existing or authorised (but yet to be implemented) activities b) how, if there are adverse impacts resulting in displacement by the proposal, they will minimise them c) how, if the adverse impacts resulting in displacement by the proposal, cannot be minimised, they will be mitigated against or d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts of	In	A detailed site selection process has been undertaken to minimise interactions of Norfolk Vanguard with existing activities and sensitive/designated areas. Offshore this included: - Shipping and navigation; - Existing infrastructure, including cables and pipelines and oil and gas platforms; - Aggregate fredging grounds; - Nature conservation designations; - Commercial fisheries activity; and - Civil and millitary radar coverage and helicopter main routes. Mitigation proposed to minimise any remaining potential impacts to an acceptable level is outlined in the ES.	ES Chapter 4 Site Selection and Assessment of Alternatives ES Chapter 18 Infrastructure and Other Users	Policy has been considered and the Application is compliant
DEF1	Proposals in or affecting Ministry of Defence Danger and Exercise Areas should not be authorised without agreement from the Ministry of Defence	In	A statement of common ground has been agreed with the MOD which confirms that any potential effects on MOD activities will be appropriately managed	MOD Statement of Common Ground (SOCG) (document reference Rep1 - SOCG -8.1)	Policy has been considered and the Application is compliant
OG1	Proposals within areas with existing oil and gas production should not be authorised except where compatibility with oil and gas production and infrastructure can be satisfactorily demonstrated.	In	The Applicant continues to engage with oil and gas developers. This consultation will be ongoing to discuss any impacts that may arise from Norfolk Vanguard and would enable any impacts to be mitigated as far as possible. This will ensure that with necessary planning and engagement, disruption due to construction will be avoided.	ES Chapter 18 Infrastructure and Other Users	Policy has been considered and the Application is compliant
OG2	Proposals for new oil and gas activity should be supported over proposals for other development.	In	The Applicant continues to engage with oil and gas developers. This consultation will be ongoing to discuss any impacts that may arise from Norfolk Vanguard and would enable any impacts to be mitigated as far as possible. This will ensure that with necessary planning and engagement, disruption due to construction will be avoided.	ES Chapter 18 Infrastructure and Other Users	Policy has been considered and the Application is compliant
WIND1	Developments requiring authorisation, that are in or could affect sites held under a lease or an agreement for lease that has been granted by The Crown Estate for development of an Offshore Wind Farm, should not be authorised unless a) they can clearly demonstrate that they will not compromise the construction, operation, maintenance, or decommissioning of the Offshore Wind Farm b) the lease/agreement for lease has been surrendered back to The Crown Estate and not been re-tendered c) the lease/agreement for lease has been terminated by the Secretary of State d) in other exceptional circumstances	N/A	The application is for the development of a round 3 offshore wind farm.	N/A	Policy N/A to application
WIND2	Proposals for Offshore Wind Farms inside Round 3 zones, including relevant supporting projects and infrastructure, should be supported	In	The application is for the development of a round 3 offshore wind farm.	ES	Policy has been considered and the Application is compliant
TIDE1		Out	Not applicable	N/A	Policy N/A to application

CCS1	Within defined areas of potential carbon dioxide	Out	Not applicable	N/A	Policy N/A to application
	storage, proposals should demonstrate in order of preference: a) that they will not prevent carbon dioxide storage b) how, if there are adverse impacts on carbon dioxide storage, they will minimise them c) how, if the adverse impacts cannot be minimised, they will be mitigated d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts				
CCS2	Carbon Capture and Storage proposals should demonstrate that consideration has been given to the re-use of existing oil and gas infrastructure rather than the installation of new infrastructure (either in depleted fields or in active fields via enhanced hydrocarbon recovery).	Out	Not applicable	N/A	Policy N/A to application
PS1	Proposals that require static sea surface infrastructure or that significantly reduce under-keel clearance should not be authorised in International Maritime Organization designated routes		The application avoids the International Maritime Organisation (IMO) DR1 Lightbouy Deep Water Route (DWR) and the West Friesland DWR. Mitigation identified within the ES and Navigation Risk Assessment will be implemented to reduce all potential impacts to acceptable or tolerable risk levels.	Navigation ES Appendix 15.1 Navigation Risk	Policy has been considered and the Application is compliant
PS2	Proposals that require static sea surface infrastructure that encroaches upon important navigation routes should not be authorised unless there are exceptional circumstances. Proposals should: a) be compatible with the need to maintain space for safe navigation, avoiding adverse economic impact b) anticipate and provide for future safe navigational requirements where evidence and/or stakeholder input allows and c) account for impacts upon navigation in-combination with other existing and proposed activities	In	The application avoids the IMO DR1 Lightbouy DWR and the West Friesland DWR. Mitigation identified within the ES and Navigation Risk Assessment will be implemented to reduce all potential impacts to acceptable or tolerable risk levels.	ES Chapter 15 Shipping and Navigation ES Appendix 15.1 Navigation Risk Assessment	Policy has been considered and the Application is compliant
PS3	Proposals should demonstrate, in order of preference: a) that they will not interfere with current activity and future opportunity for expansion of ports and harbours b) how, if the proposal may interfere with current activity and future opportunities for expansion, they will minimise this c) how, if the interference cannot be minimised, it will be mitigated d) the case for proceeding if it is not possible to minimise or mitigate the interference	In	There are no existing or planned port or harbours within the Norfolk Vanguard offshore project area and therefore no mechanism for Norfolk Vanguard to interfere with activity and future opportunity for expansion of ports and harbours. During the life of the project, Norfolk Vanguard will require port/harbour facilities and therefore would support opportunities for port and harbour expansion.	ES Chapter 15 Shipping and Navigation ES Appendix 15.1 Navigation Risk Assessment	Policy has been considered and the Application is compliant
DD1	Proposals within or adjacent to licensed dredging and disposal areas should demonstrate, in order of preference a) that they will not adversely impact dredging and disposal activities b) how, if there are adverse impacts on dredging and disposal, they will minimise these c) how, if the adverse impacts cannot be minimised they will be mitigated d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts	In	There are no active dredging or disposal sites within the Norfolk Vanguard offshore project area. There is one disused marine disposal site HU202 (BBL Pipeline disposal site) that overlaps with Norfolk Vanguard East and the offshore cable corridor but as this is disused there is no pathway for impact. There is a licenced disposal site to accomodate sediment disposal for the East Anglia THREE offshore wind farm adjacent to Norfolk Vanguard East. A Cooperation Agreement exists between SPR and Vattenfall Wind Power Ltd (parent company of Norfolk Vanguard Ltd) which provides commitment from both parties to co-ordinate and liaise throughout the development of each of their projects. Therefore there would be no impact on the disposal activities for East Anglia THREE.	ES Chapter 18 Infrastructure and Other Users East Anglia THREE SOCG (document reference Rep1 - SOCG - 4.1)	Policy has been considered and the Application is compliant
AGG1	Proposals in areas where a licence for extraction of aggregates has been granted or formally applied for should not be authorised unless there are exceptional circumstances.	Out	There are no aggregate dredging areas within the Norfolk Vanguard offshore project area.	N/A	Policy N/A to application
AGG2	Proposals within an area subject to an Exploration and Option Agreement with The Crown Estate should not be supported unless it is demonstrated that the other development or activity is compatible with aggregate extraction or there are exceptional circumstances.	Out	There are no aggregate dredging areas within the Norfolk Vanguard offshore project area.	N/A	Policy N/A to application
AGG3	resource, proposals should demonstrate in order of preference: a) that they will not, prevent aggregate extraction b) how, if there are adverse impacts on aggregate extraction, they will minimise these c) how, if the adverse impacts cannot be minimised, they will be mitigated d) the case for proceeding with the application if it is not possible to minimise or mitigate	Out	There are no aggregate dredging areas within the Norfolk Vanguard offshore project area.	N/A	Policy N/A to application
CAB1	Preference should be given to proposals for cable installation where the method of installation is burial. Where burial is not achievable, decisions should take account of protection measures for the cable that may be proposed by the applicant	In	It is the Applicant's preference to bury cables and therefore only use surface protection where necessary at crossings and at locations where cable burial is not possible due to the presence of hard substrate close to the surface. A Scour Protection and Cable Protection Plan (required under the draft Development Consent Order (DCO) Schedules 9 and 10 Condition 14(1)(e) and Schedules 11 and 12 condition 9(1)(e), in accordance with the Outline Scour Protection and Cable Protection Plan (document reference 8.16)), must be approved by the MMO prior to construction. This document will be updated as the final design of the Project develops and will include justification of the location, type, volume and area of cable protection, based on crossing agreements and pre-construction survey data to ensure only essential cable protection can be installed.	ES Chapter 5 Project Description, Outline Scour Protection and Cable Protection Plan (document 8.16)	Policy has been considered and the Application is compliant

FISH1	Within areas of fishing activity, proposals should demonstrate in order of preference: a) that they will not prevent fishing activities on, or access to, fishing grounds b) how, if there are adverse impacts on the ability to undertake fishing activities or access to fishing grounds, they will minimise them c) how, if the adverse impacts cannot be minimised, they will be mitigated d) the case for proceeding with their proposal if it is not possible to minimise or mitigate the adverse impacts		Impacts to fishing activity have been considered and assessed as part of the application, including potential for loss of /restricted access to fishing grounds to occur as a result of the Project during construction/decommissioning and operation. The Applicant is committed to promote co-existence between the Project and the fishing industry and with this in mind an outline Fisheries Laison and Co-existence Plan (FLCP) has been submitted as part of the Applicant's Deadline 2 submissions (Document 8.19). Further detail with regards to the approach to liaison and co-existence Plan (FLCP) has been submitted as part of the Applicant's Deadline 2 submissions (Document 8.19). Further detail with regards to the approach to liaison and co-existence strategies will be provided within the final FLCP to be produced pots-consent. With regards to the local inshore fleet the assessment of loss of grounds identified impacts of minor significance. In this context it should be noted that the majority of flishing activity by this fleet takes place inshore and fishing would be able to resume within the operational phase in areas relevant to the export cable corridor during operation. For the construction phase, however, the assessment recognised that that there may be occasions when certain local fishing vessels may need to relocate their gear as a result of cable installation activity, in these instances, evidence based mitigation, as specified in the Fishing Isson with Offshore Wind and Wet Renewables Group (FLOWW). Guidelines will be applied. With regards to other fishing fleets, including towed gear UK and non-UK fleets, taking account of concerns raised by stakeholders in relation to the use of floating foundations and the minimum spacing of 680m between wind turbine generators, it was assumed for assessment of loss of grounds that the skippers of vessels that operate towed gear would elect not to fish within the operational site. The assemblent took count of the extent of the potential site. The assessment to account of the	ES Chapter 14 Commerical Fisheries Outline Fisheries Liaison and Coexistence Plan (document 8.19.	Policy has been considered and the Application is compliant
FISH2	Proposals should demonstrate, in order of preference: a) that they will not have an adverse impact upon spawning and nursery areas and any associated habitat b) how, if there are adverse impacts upon the spawning and nursery areas and any associated habitat, they will minimise them c) how, if the adverse impacts cannot be minimised they will be mitigated of the case for proceeding with their proposals if it is not possible to minimise or mitigate the adverse impacts		The application considers potential impacts to ecological and commercially important fish species, including effects on spawning and nursery grounds. The significance of all impacts will be minor adverse or less.	ES Chapter 11 Fish and Shellfish Ecology	Policy has been considered and the Application is compliant
AQ1	Within sustainable aquaculture development sites (identified through research), proposals should demonstrate in order of preference: a) that they will avoid adverse impacts on future aquaculture development by altering the sea bed or water column in ways which would cause adverse impacts to aquaculture productivity or potential b) how, if there are adverse impacts on aquaculture development, they can be minimised c) how, if the adverse impacts cannot be minimised they will be mitigated d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts.	Out	There are no aquaculture development sites in the Norfolk Vanguard study area	N/A	Policy N/A to application
TR1	Proposals for development should demonstrate that during construction and operation, in order of preference: a) they will not adversely impact tourism and recreation activities b) how, if there are adverse impacts on tourism and recreation activities, they will minimise them o) how, if the adverse impacts cannot be minimised, they will be mitigated d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts		One of the objectives of the Norfolk Vanguard site selection process was to avoid valuable natural assets such as the North Norfolk Coast Area of Outstanding Natural Beauty (AONB). This allowed the avoidance of corresponding clusters of tourism and recreation assets. In addition, and in response to consultation with stakeholders, a horizontal drilling design has been developed that will not require closure of either the coastal footpaths or the beach.	ES Chapter 30 Tourism and Recreation	Policy has been considered and the Application is compliant
TR2	Proposals that require static objects in the East marine plan areas, should demonstrate, in order of preference: a) that they will not adversely impact on recreational boating routes b) how, if there are adverse impacts on recreational boating routes, they will minimise them c) how, if the adverse impacts cannot be minimised, they will be mitigated d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts		Recreational vessels have been considered within the NRA and ES. Recreational vessel (classed as 2.5 to 24m length) movements were very low during the marine traffic surveys and there are no RYA cruising routes passing through the OWF sites. Given the low number of vessels, consultation responses indicating no concerns over the project, the continued ability to transit through the buoyed construction area and embedded mitigation of promulgation of information, the displacement of recreational vessels from the proposed project has no perceptible effects and is not significant in EIA terms	ES Chapter 15 Shipping and Navigation, ES Appendix 15.1 Navigation Risk Assessment	Policy has been considered and the Application is compliant
TR3	Proposals that deliver tourism and/or recreation related benefits in communities adjacent to the East marine plan areas should be supported.	In	The use of below ground infrastructure and situating wind turbines 47km offshore limits opportunities for potential benefit to tourism suppliers. However, due to the proposed siting of the Norfolk Vanguard landfall at Happisburgh South, an area recognised as an internationally important region for Lower Palaeolithic archaeology, the project has undertaken an engagement process with a specific independent academic steering group in relation to the Ancient Humans of Britatin project. This engagement process aims, in part, to maximise knowledge gained from pre-construction and construction activities. Opportunities for public engagement on the basis of any data obtained are currently under consideration, with approaches similar to the Jurassic Coast and Deep History Coast projects being explored.	ES Chapter 28 Onshore Archaeology and Cultural Heritage. ES Chapter 30 Tourism and Recreation	Policy has been considered and the Application is compliant