

From: [Pater, Chris](#)
To: [Norfolk Vanguard](#)
Cc: [Fletcher, Will](#)
Subject: RE: Norfolk Vanguard Project – EN010079
Date: 05 April 2019 14:55:36
Attachments: [2019-04-05_Historic England response to PINs for Vattenfall Vanguard ISH Actions.pdf](#)

Dear Sir/Madam,

Please find our Deadline 6 submission attached.

Yours faithfully,

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

Please note that our Guildford office is closing on 12 April 2019, and from 15 April we will be based at the following address:

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Mb: [REDACTED]

Email: chris.pater@HistoricEngland.org.uk

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Historic England

Norfolk Vanguard Project Team
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Temple Quay House
2 The Square
Bristol BS1 6PN

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

Telephone [REDACTED]
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5th April 2019

Dear Sir/Madam,

Norfolk Vanguard Offshore Wind Farm: Action from Issue Specific Hearing on 28th March 2019
Examination Registration ID: 20012795

Further to publication of the Actions from the Issue Specific Hearing held on the draft Development Consent Order on 28th March 2019, we note the following Actions require our attention:

Action 5 – directed to Historic England and the MMO:
“Submission of wording from Hornsea 3 and Thanet”

We offer in response (as set out in our letter to you dated 12th March 2019), that the wording of Condition 14(h) within Schedule 9 (Deemed Marine Licence) – Generation Assets; and Schedule 10 – Generations Assets is amended to six months prior to the intended commencement of licensed activities.

We add that Condition 10(2) within Schedule 11, Transmission Assets (Deemed Marine Licence 1); and Schedule 12, Transmission Assets the same amendment is requested so that submission for approval is at least six months prior to the intended commencement of licensed activities.

We hereby confirm that such an amendment would be line with the Revised Draft Development Consent Order for the proposed Hornsea Project Three Offshore Wind Farm (document reference: EN10080-001882, dated 14th March 2019) and we refer you to the equivalent provisions of the deemed Marine Licences:



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- Schedule 11 (Generation Assets), Part 2, Condition 13(2) (pre-construction plans and documentation) states that: *“The licensed activities or any part of those activities must not commence unless no later than six months prior to the commencement a written scheme of archaeological investigation has been submitted to and approved by the MMO, in accordance with the outline offshore written scheme of investigation...”*

We consider such a measure as included within the Revised Draft Development Consent Order for the proposed Hornsea Project Three Offshore Wind Farm is equally applicable to the proposed Norfolk Vanguard Offshore Wind Farm development. In both instances these are spatially extensive offshore developments and should take all necessary steps to put in place the requisite mitigation measures to inform project delivery, should consent be obtained.

The situation regarding the proposed Thanet Extension Offshore Wind Farm is different to both Hornsea Project Three and Norfolk Vanguard in that the Thanet Extension is for a spatially smaller project contiguous with an existing offshore wind farm development. Furthermore, the marine archaeological Written Scheme of Investigation (WSI) required for the proposed extension project should be able to draw on work produced by the previous marine archaeological WSI for the Thanet Offshore Wind Farm project. Therefore, in Thanet Extension Offshore Wind Farm: Revised Draft Development Consent Order (Revision C, dated March 2019), Schedule 11 Generation Assets (Deemed Marine Licence) Condition 14(1), it states that submission for approval is to be at least four months prior to the intended commencement of licensed activities unless otherwise formally agreed with the MMO.

We also take this opportunity to identify the following matters Deemed Marine Licence Schedules 9, 10, 11 and 12 which require amendment to:

- Schedule 9, 14(h)(vii) – “implementation of the Offshore Renewables Protocol for Reporting Archaeological Discoveries as set out by The Crown Estate including reporting of any wreck or wreck material during construction, operation and decommissioning of the authorised scheme;”
- Schedule 9, 18(2)(a) – “a high-resolution full sea floor coverage swath bathymetric survey to include a 100% coverage that meets the requirements of IHO S44ed Order 1a, and side-scan sonar survey of the area(s) within the Order limits within which it is proposed to carry out construction works and disposal activities under this licence;”
- Schedule 9, 20(2)(e) (post construction monitoring) – “a bathymetric survey to monitor the effectiveness of archaeological exclusion zones identified to have been potentially impacted by construction works. The data shall be analysed by an accredited archaeologist as defined in the offshore written scheme of investigation required under condition 14(h)”

Action 13 – directed to Historic England (and if desired, Natural England/ Applicant for further discussion):

“Submission of information from Hornsea 3 and Thanet dDCO on consistency of provisions, for example in relation to SIP provision and seabed clearance”

In our review of the draft Development Consent Orders we noted that within the draft Development Consent Orders for the proposed Hornsea Project Three Offshore



Wind Farm (Generation Assets) that the following provisions were included which appear to be presently absent from the proposed Norfolk Vanguard Offshore Wind Farm draft Deemed Marine Licence – Generation Assets:

- Timing of monitoring report;
- Updating of cable monitoring plan;
- Reporting of impact pile driving (*note that this provision is within Norfolk Vanguard Transmission Assets – deemed Marine Licence*); and
- Reporting of cable protection

It was also noticed that the following provisions were included within the proposed Thanet Extension Offshore Wind Farm draft Deemed Marine Licences, but appear to be absent within the draft Deemed Marine Licences for the proposed Norfolk Vanguard Offshore Wind Farm – Generation Assets:

- Reporting of impact pile driving (*note that this provision is within Norfolk Vanguard Transmission Assets – deemed Marine Licence*);
- Fisheries liaison and coexistence plan;
- Seabed preparation and clearance (*note that this provision includes specific reference to the offshore archaeological draft written scheme of investigation*);
- Dredge disposal; and
- Decommissioning.

We must state that there are matters in the above provisions that are not related to the role and responsibilities of Historic England for which we offer no further comment, apart from matters to do with “Seabed preparation and clearance” as highlighted above. We must therefore defer to the relevant competent authorities regarding the inclusion or exclusion of such provisions within any of the draft deemed Marine Licence schedules for the proposed Norfolk Vanguard Offshore Wind Farm.

Yours faithfully,



Dr Christopher Pater
Head of Marine Planning

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



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