



Department for  
Energy Security  
& Net Zero

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Web:

<https://www.gov.uk/desnz>

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To:

Our Ref: EN010079

Norfolk Vanguard Limited  
Norfolk Vanguard East Limited  
Vattenfall Wind Power Limited

Dear Sir or Madam,

**Norfolk Vanguard Offshore Wind Farm Order 2022 – Proposed Non-Material Change Application 2023**

**POINTS OF CLARIFICATION**

1. On 29 June 2023, the Secretary of State for Energy Security and Net Zero (“the Secretary of State”) was provided with an application for a proposed non-material change (“the 2023 Application”) by Norfolk Vanguard Limited and Norfolk Vanguard East Limited (together “the Applicant”).
2. The Secretary of State would be grateful if the Applicant and/or Vattenfall Wind Power Limited (“Vattenfall”) could provide information regarding the specific issues set out below.

**Definition of ‘drills’ and ‘drilling rigs’**

3. The Secretary of State notes that various documents provided and referenced as part of the Application refer to both ‘drills’ and ‘drilling rigs’. It is also noted that the 2023 Application states that the Norfolk Vanguard project (“Vanguard”) would have six drills in total (four operational, two reserves) whilst the Norfolk Boreas project (“Boreas”) would have three drills total (two operational, one reserve) (paragraphs 7 and 36, Supporting Statement).
4. The **Applicant** and/or **Vattenfall** should clarify the exact definitions of the terms ‘drills’ and ‘drill/drilling rigs’ across both projects, so that any difference between the two terms is clear.

**Concurrent drilling activity**

5. The 2023 Application states that two ‘drilling rigs’ could be in concurrent operation at landfall for Vanguard (Table 2 and paragraph 36, Supporting Statement). The 2023 Application also evidences the Boreas Environmental Statement (“ES”)

Chapter 25: Noise and Vibration<sup>1</sup> to state that with “two drill rigs working concurrently as would be the case with this NMC the impact would be the same as that assessed in the cumulative assessment for Norfolk Boreas” (Table 2, Supporting Statement). The Boreas ES also highlights that Vanguard and Boreas could conduct landfall duct installation concurrently, known as Option B (ES paragraph 67).

6. The **Applicant** and/or **Vattenfall** should clarify the total number of ‘drills’ and/or ‘drilling rigs’ that it is proposed would be operating concurrently across all projects, confirming whether or not the total number would be no more than two across Vanguard alone, or in combination with Boreas.
7. The **Applicant** and/or **Vattenfall** should further clarify the basis upon which they state at paragraph 7 that the cumulative impacts across Vanguard and Boreas are anticipated to be less than initially predicted.

### **Plan showing landfall layout**

8. The Secretary of State notes that Figure 2 of the 2023 Application (Supporting Statement) appears to show physical cross-over between the landfall compounds of Vanguard with those of Boreas, which are shown in Figure 4.7 of the Boreas ES<sup>2</sup>. The **Applicant** should provide a plan showing the layout at landfall which combines all details for both Vanguard and Boreas.

### **Temperature of onshore cables**

9. The **Applicant** should clarify whether the positive and negative cables will be re-bundled in ducts for the 60km between the landfall zone and the onshore project substation at Necton, and whether these onshore ducts will be made of similar material to the ducts used at landfall. The Secretary of State notes that the 2023 Application states that the insulating material for the ducts at landfall may degrade when the cables are bundled (paragraph 13, Supporting Statement).

### **Impact of increased number and length of marine trenching**

10. The Applicant should clarify the text in parenthesis at the end of paragraph 17 of the 2023 Application (Supporting Statement) and direct the Secretary of State to the sections of the Environmental Statement which refer to marine trenching. The Applicant should also further explain its position in respect of the additional 0.7% disturbance offshore, as referred to in pages 20 and 21 of the 2023 Application (Supporting Statement), explaining the cause of this disturbance as well as clarifying what specific activities will take place on the seabed area that is contained within the landfall region and on approach to the landfall region.

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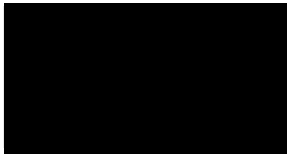
<sup>1</sup> <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010087/EN010087-000411-6.1.25%20Environmental%20Statement%20Chapter%2025%20Noise%20and%20Vibration.pdf>

<sup>2</sup> <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010087/EN010087-000427-6.2.4.7%20Environmental%20Statement%20Figure%204.7%20Landfall%20location.pdf>

## Volume of drill arisings

11. The 2023 Application states that there will be an increase to the maximum volume of drill arisings (paragraph 18, supporting statement). It also states that there will be no change to the volume noted (400,624m<sup>3</sup>) within Schedule 9, Part 3 (1)(f) of the DCO (row 28, Table 1, Supporting Statement). The **Applicant** should clarify whether there would be an increase in drill arisings associated with the 2023 Application.
12. The Secretary of State would be grateful if the Applicant or Norfolk Boreas Limited could respond by email by **23.59pm on 28 July 2023** to [NorfolkVanguard@planninginspectorate.gov.uk](mailto:NorfolkVanguard@planninginspectorate.gov.uk). Consultees will then have opportunity to respond to the published information by 23.59pm on 29 August.
13. This letter is without prejudice to the Secretary of State's approval for any aspects of the proposed changes to the 2022 Order which fall to him for consideration and determination, or whether the proposed changes will ultimately be regarded as material or not.

Yours sincerely,



Alastair Paterson

Energy Infrastructure Planning

Department for Energy Security and Net Zero