



Historic England

National Infrastructure Planning
The Planning Inspectorate,
Temple Quay House,
2 The Square,
Temple Quay,
Bristol BS1 6PN

Our ref: OWF/Vanguard
Your ref: EN010079
Telephone [REDACTED]

4th August 2023

Dear Sir/Madam,

**Norfolk Vanguard Offshore Wind Farm Order 2022
Application for non-material change (increase of ducts from two to four)**

Further to the email and attached documents, dated 4th July 2023, received from Ruari Lean (Norfolk Vanguard Project Manager, Vattenfall), regarding an application to the Department for Energy Security and Net Zero (DESNZ) for a non-material change to the Norfolk Vanguard Offshore Wind Farm Order 2022, we offer the following response.

The Historic Buildings and Monuments Commission for England, otherwise known as Historic England, is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). Our purpose is to improve people's lives by championing and protecting the historic environment and our vision is for a heritage that is valued, celebrated and shared by everyone. A historic environment that people connect with and learn from and that we are proud to pass on to future generations.

We understand that this application is focused on increasing the number of electricity export cable ducts at the landfall location (Happisburgh South, Norfolk) from two to four and the number of reserve drills from one to two in case of drill failure, conducted as part of a Horizontal Directional Drilling (HDD) programme. We are aware that this change is considered necessary to limit overheating for the electricity cable bundles from Norfolk Vanguard East (NVE) and Norfolk Vanguard West (NVW).

We have considered the information provided in *Norfolk Vanguard Offshore Wind Farm DCO Non- Material Change 2 Supporting Statement for increase in ducts and drills at Landfall* (Doc Ref: PB5640.008.0078; Date: July 2023) and offer the following comments.



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On the basis of the information supplied to us, as set out in Table 2, we concur that the important factor is the depth and bore of HDD, and that the proposed increase in ducts (and reserve drills) at sufficient depth, should not impact the sedimentary sequences that exist at Happisburgh, which are of international importance for palaeolithic archaeology. The recognition of this sensitivity by the Applicant is an important point. We also acknowledge the detail provided in Table 3 (Summary of pre-submission consultation responses) regarding engagement with Historic England.

We also acknowledge receipt of an email from R. Lean Esq on 3rd August 2023 regarding the response produced by Vattenfall to a letter from the Secretary of State DESNZ (dated 21st July 2023).

Regarding Point 6 in the Secretary of State's letter ("Impact of increased number and length of marine trenching"), we understand from the response provided by the Applicant in *Norfolk Vanguard Offshore Wind Farm, DCO Non-Material Change 2, Response to Points of Clarification Letter* (Doc Ref: PB5640.008.0087; Date: July 2023), that the four single submarine electricity export cables that are to approach the ducts will need to be buried separately, resulting in an increase in seabed disturbance of up to 1.5km. We note that the Applicant explains this as an increase of approximately 0.7% from that assessed within the Environmental Statement (dated June 2018).

The important factor to consider in reference to the historic environment (either known or presently unknown) is highlighted in paragraph 24 regarding installation techniques and methods used to install marine cable(s), which should be the same as described within the Environmental Statement (ES).

In reference to archaeological sensitivity, we must focus attention on the risk of encountering heritage assets in any situation, even if there is only to be a "very small increase in the overall area of disturbance". In reference to The Norfolk Vanguard Offshore Wind Farm Order 2022 and the conditions specified in:

- Schedule 11 – Deemed Licence under the 2009 Act – Transmission Assets (Licence 1 – Phase 1) Part 4 (Conditions) 9(1)(h) & 9(2); and
- Schedule 12 – Deemed Licence under the 2009 Act – Transmission Assets (Licence 2 – Phase 2) Part 4 (Conditions) 9(1)(h) & 9(2)

we consider the necessary mitigation requirements for the historic environment are secured in these conditions of consent to address risk as presented by the proposed changes set out in the above referenced non-material change application.

In conclusion, we note that the Applicant has not identify any materially new or different environmental impacts to either the known or unknown historic environment beyond those assessed in the ES (as dated above), relevant to the amended Norfolk Vanguard Offshore Wind Farm Amendment Order 2022, and we have no further advice to offer.

Yours faithfully,



Dr Christopher Pater
Head of Marine Planning



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