

From: [REDACTED]
To: [Norfolk Vanguard](#)
Subject: RE: Norfolk Vanguard Offshore Wind Farm Project (EN010079) - response to Examination Authorities Initial Questions
Date: 16 January 2019 22:39:35
Attachments: [2019-01-16_EN010079_NORFOLK VANGUARD_Response to First Questions_Historic England.pdf](#)

Dear Sir/Madam,

PINS Registration ID: 20012795

Please find attached our responses to the Examination Authorities First Written Questions.

Yours faithfully

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

Historic England | Eastgate Court | 195 – 205 High Street | Guildford | Surrey | GU1 3EH
Mb: [REDACTED]
Email: chris.pater@HistoricEngland.org.uk

We have launched four new, paid-for Enhanced Advisory Services, providing enhancements to our existing free planning and listing services. For more information on the new Enhanced Advisory Services as well as our free services go to our website: HistoricEngland.org.uk/EAS



Historic England

We are the public body that helps people care for, enjoy and celebrate England's spectacular historic environment, from beaches and battlefields to parks and pie shops.

Follow us: [Facebook](#) | [Twitter](#) | [Instagram](#) Sign up to our [newsletter](#)

This e-mail (and any attachments) is confidential and may contain personal views which are not the views of Historic England unless specifically stated. If you have received it in error, please delete it from your system and notify the sender immediately. Do not use, copy or disclose the information in any way nor act in reliance on it. Any information sent to Historic England may become publicly available. We respect your privacy and the use of your information. Please read our full [privacy policy](#) for more information.

From: Norfolk Vanguard [mailto:NorfolkVanguard@pins.gsi.gov.uk]
Sent: 19 December 2018 15:41
To: Pater, Chris
Subject: Norfolk Vanguard Offshore Wind Farm Project (EN010079)

Norfolk Vanguard Offshore Wind Farm Project (EN010079)

Dear Sir/Madam

Your Reference: 20012795

Please find below a link to the Rule 8 letter giving notice of the procedural decisions made following the Preliminary Meeting about the way in which the proposal for the above project is to be examined. This includes the timetable for the examination of the application and the Examining Authority's initial questions. It also requests Statements of Common Ground and Local Impact Reports, and invites Interested Parties to submit written representations.

<http://infrastructure.planninginspectorate.gov.uk/document/EN010079-002191>

Yours faithfully
Norfolk Vanguard Project Team

Email: NorfolkVanguard@pins.gsi.gov.uk
Telephone: 0303 444 5000
Web: <https://infrastructure.planninginspectorate.gov.uk>

Correspondents should note that all communications to or from the Planning Inspectorate may be automatically logged, monitored and/or recorded for lawful purposes.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager.

This footnote also confirms that this email message has been scanned by Websense Email Security Gateway for the presence of computer viruses.

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>



Historic England

Norfolk Vanguard Project Team
The Planning Inspectorate
3/18 Eagle Wing
Temple Quay House
2 The Square
Bristol BS1 6PN

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

Telephone
Fax



16th January 2019

Dear Sir/Madam,

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

Thank you for your letter, dated 19th December 2018, regarding the procedural decisions made following the Preliminary Meeting (held on 10th December), the timetable for the examination of the application and the Examining Authority's initial questions.

We hereby offer response to those initial questions that are most closely associated with our responsibilities as Historic England.

Question 1.2 - Please provide comments on any relevant information contained in the Change Report [AS-009] and Errata document [AS-010], and whether you agree with the conclusions reached by the Applicant. In the event that the amendments are accepted please indicate any consequential amendments which you require to the dDCO.

Applications Document Errata

We note that within "Application Documents Errata" Document Reference: Pre-ExA; Errata; 9.4 (dated December 2018) that the document submitted gives details about inconsistencies and errors identified in the Norfolk Vanguard Development Consent Order (DCO) application documents, which are considered by the Applicant to be "non-material". Within Table 2.1 (Errata List) we noticed the inclusion of Onshore Archaeology and Cultural Heritage (Ref: 28.1) and that the particular issue is to do with project visualisations associated with project infrastructure and any indirect



Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



impacts on the significance of heritage assets due to proposed development within what might be considered to be their setting.

We have considered the detail provided in Section 2.1 (of the above referenced Errata document regarding the identified heritage-specific viewpoints (Table 2.2) and the conclusions drawn by the Applicant that "...none of the heritage assets outlined in Table 2.2 were found to share intervisibility with the onshore project substation and associated infrastructure". Furthermore, that "...no impacts to heritage setting (and associated significance) were identified as arising from the project". Consequently the Applicant has decided that no further mitigating action was considered to be required.

Specifically, it was determined that Church of St Andrew, Bradenham (Grade 1) might be subject to an impact of "minor adverse" significance due to what is considered as "...very slight visibility of the onshore project substation from the grounds..." although "...not considered to constitute harm to the heritage significance" (sub-section 2.1.3.1 [Potential Impacts During Operation], paragraph 23. We note that the conclusion of the Environmental Statement (ES) will therefore be amended in this instance from "no impact" to "minor adverse".

Section 2.1.3.2 [Cumulative Impacts], states that, in reference to the Church of St Andrew (Bradenham), that there is "...potential for a cumulative impact to occur" in reference to both the proposed Norfolk Boreas and proposed Norfolk Vanguard onshore project electricity substations and that the impact significance, as presented in the submitted ES has now been amended from "no impact" to "minor adverse". Furthermore we note that Appendix 28.7 [Heritage Settings Assessment (Onshore Project Substation and Associated Infrastructure Related) Workings] has also been updated in reference to these matters.

Our advice

In consideration of the proposed amendment to the ES we require an opportunity to consider further the amended conclusions drawn by the Applicant; and we request that should we wish to offer further advice that we do so at the Issue Specific Hearing to be held on Tuesday 5th February (at Blackfriars Hall, Norwich).

Change Report

(Letter dated 12th December 2018 from Womble Bond Dickenson (UK) LLP to The Planning Inspectorate - Document Reference: Pre-ExA; Change Report; 9.3 dated December 2018)

We note that this document outlines minor changes to some elements of the Project, including minor amendments to the Order limits. Furthermore, we note that the Applicant has determined that none have been found to alter the significance of environmental impacts assessed in the ES.

The main purpose of this report is to address the following matters identified as "minor project design amendments" and summarised here as:

- An increase in the number and diameter of piles for the offshore electrical platforms (discussed further in Section 2.1); and
- Amendments to the submitted onshore Order limits as requested by landowners, including changes requested by National Grid to the tower search areas and the inclusion of new permanent rights for that part of the overhead line to be re-positioned (discussed further in Section 2.2).



Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Our advice

In reference to “Offshore Electrical Platform Piles” (section 2.1), we have considered the detail of the report submitted and concluded that given there is no specific attention given to whether or not elements of the historic environment (known and unknown) might be at risk we cannot offer any further comment at this stage.

In reference to “Amendments to the submitted onshore order limits” (section 2.2), we note the detail provided in Tables 2.9 - 2.15 regarding Onshore Archaeology and Cultural Heritage (Chapter 28 of the ES) that there is “no change” to the previously assessed findings. At this stage we have no further comment to offer as such matters are primarily the responsibility of the relevant LPAs and their archaeological advisors.

Question 7.2 - Please clarify what you mean by the ‘statutory historic body’ in the OWSI Offshore [APP-030], as this is not defined in the dDCO.

Historic England is the statutory lead for the historic environment and the wording should be amended accordingly to include our official title under the National Heritage Act 1983 which is the Historic Buildings and Monuments Commission for England, and therefore this name should be used in all legal documents, such as the draft Development Consent Order.

Question 7.4 - Are you content that the requirement to submit a ‘written scheme of archaeological investigation’ four months prior to commencement of licensed activities would provide a sufficient amount of time to review and approve the proposed arrangements?

We consider it would appropriate for the applicant to supply a draft WSI with the submission of the ES and that a full agreed and approved archaeological Written Scheme of Investigation (WSI) be made available 6 months prior to commencement of licensed activities. In our Written Representation (dated 16th January 2019) we have highlighted important matters regarding action which should be taken to optimise efficiencies and coordination between survey data acquisition programmes (i.e. geophysical and geotechnical) as will be required should consent be obtained. In particular, prescribed project documentation that steer pre-commencement surveys should be prepared in reference to an archaeological Written Scheme of Investigation (onshore and offshore) and fully referenced in all relevant construction management documents to ensure contractors and subcontractors are aware of survey method statements generated from any agreed Written Scheme of Investigation.

Question 14.18 - Do you concur with the assessment of the effects of construction of the onshore cable route (including mobilisation areas) upon heritage assets Salle Park and Blickling Hall as set out in table 29.10 in ES Chapter 29?

Our view is that the onshore cable route would result in harm to the significance of these assets during the construction phase, but consider that the impacts would be limited to the construction period and can be mitigated by ensuring the landscape is restored to its current or to an enhanced condition. Further mitigation would potentially be possible through careful management of the construction process, i.e. by limiting the construction activities in these areas. This would need to be detailed



by the applicant in the construction management plan. Ensuring suitable application of any mitigation, and the successful restoration would also be a matter for the Local Planning Authority (LPA) and the landowners. The balance as to whether any enhancements offered by the applicant would offset the harm to the significance of these designated landscape assets would need to be determined by the examining authority as set out in Planning Policy.

Question 15.2 – Are you satisfied that all necessary intensive evaluation, such as trial trenching, would take place post-consent and that any mitigation required as a result of this is adequately secured in the dDCO.

In our view best practise would involve the applicant undertaking some invasive evaluation prior to the submission of the Environmental Statement (ES). We consider that the strategy for archaeological mitigation is however a matter for the relevant LPA and their archaeological advisors. The risk that a nationally important, but unknown and non-designated archaeological discovery is made during the construction phase lies with the Applicant.

15.3 - Are you satisfied with the wording of Requirement 23 of the dDCO?

We have no comments to offer at this stage regarding matters associated with archaeological written scheme of investigation provisions within Schedule 1 (Authorised Project), Part 3 (Requirements). The substance and appropriateness of the onshore (archaeological) Written Scheme of Investigation (WSI) is a matter for the LPA and their archaeological advisors.

Question 15.4 - Section 28.7.2.2 of Chapter 28 of the ES [APP-352] refers to additional mitigation including the temporary suspension of works in the event of an archaeological discovery. Please comment on the likely effectiveness of this approach, particularly if intrusive groundworks are to be carried out when an appropriately qualified archaeologist is not present.

Any mitigation would need to be detailed in the WSI and this would be a matter for the LPA and their archaeological advisors.

Question 15.5 - Please comment on the applicability of the Offshore Renewable Protocol for Archaeological Discoveries (ORPAD) to onshore construction activities and archaeology.

ORPAD¹ is a system used exclusively for reporting discoveries within any area subject to Deemed Marine Licence consent. To date, ORPAD has been adopted by offshore wind farm developers during pre-application preliminary investigations, as well as during all stages of post-consent delivery as an effective means to facilitate communication between all relevant parties should a project encounter materials of apparent or unknown archaeological interest. The provisions within the draft Development Consent Order regarding how such a reporting protocol system could be used onshore are mitigation measures which are matter for the LPA and their archaeological advisors to offer advice on accordingly.

¹ The Crown Estate (2014) *Protocol for Archaeological Discoveries – Offshore Renewable Energy Projects*. Published by Wessex Archaeology, Salisbury on behalf of The Crown Estate.

20.56 – Requirement 23 refers to an archaeological written scheme of investigation to be approved by the relevant planning authority after consultation with Historic England and Norfolk County Council.

Please comment on the County Council's proposed additional requirements:

A) No development [shall] take place other than in accordance with the submitted and approved Outline Written Scheme of Investigation: Archaeology and Cultural Heritage (Onshore). And, separately,

B) The development [shall] not be operated until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the archaeological written scheme of investigation approved under (A) and the provision to be made for analysis, publication and dissemination of results and archive deposition has been secured.

Historic England would not normally comment on the wording of conditions placed on an application and consider that this is a matter for the LPA and the determining authority.

Yours sincerely,



Dr Christopher Pater
Head of Marine Planning

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