

Dear Mr Leigh,

In your letter to the Vanguard and Boreas Interested Parties dated 29 April 2021 *Request For Information Following The High Court's Decision To Quash The Norfolk Vanguard Offshore Wind Farm Order 2020*, you asked for representations and comments from interested parties on a number of matters regarding the re-determination of the Norfolk Vanguard Project.

As Norfolk residents and therefore interested parties to both Vanguard and Boreas developments, please see our responses below to your questions.

The procedure which the Secretary of State now proposes to follow

The procedure which the Secretary of State is proposing is solely reliant on the re-examination of the LVIA (Landscape and Visual Impacts Assessment) at Necton and seemingly contrary to procedural fairness. The proposal fails to consider the re-examination of all contributing factors to the LVIA across the whole of Vanguard and Boreas projects from offshore to onshore. The court ruled that combined LVIAs were not properly assessed at the Necton Substation site, however it leads to more questions as to whether other areas of the projects were not properly assessed for cumulative impacts.

At present there is no reason for the Secretary of State to consider both Vanguard and Boreas separately as they are now both with the Secretary of State. Boreas is no longer a successive project to Vanguard, they are now concurrent and should be considered together as one project. Without considering the cumulative onshore landscape impacts of both Vanguard and Boreas the re-examination would be materially deficient.

Therefore, the procedure should be to re-examine the cumulative impacts from both projects and to do this effectively both projects should be required to make one new combined DCO application. Only by having one DCO Application that combines the projects can we safely know that all impacts from both Vanguard and Boreas will be fairly assessed.

Whether as part of that procedure, he should ask the Planning Inspectorate to reopen the examination to consider the cumulative landscape and visual impacts at Necton

Yes, the examination should be re-opened to consider the cumulative landscape and visual impacts at Necton. However, we strongly recommend all cumulative impacts should be assessed across the combined projects through one new DCO application for both Vanguard and Boreas.

Whether Interested Parties agree with the Secretary of State's assessment of the situation set out at paragraph 6 above regarding the additional materials that will put him in a better position to make the assessment of cumulative landscape and visual impacts in the redetermination of the Norfolk Vanguard application and whether Interested Parties consider there to be any further documents submitted as part of the Norfolk Boreas examination that would be helpful in this regard

The additional materials suggested by the Secretary of State to aid the re-determination are inadequate, all that has been suggested is for a prospective design process to be included which was put forward by Norfolk Boreas. As a bare minimum there needs to be proper consideration for the nature of cumulative impacts, their consequences, alternatives, and mitigation measures.

Additional materials required to be included in the re-determination:

- Consideration of cumulative impacts from new projects e.g. combined implications of cables routes from Vanguard, Boreas, proposed Sheringham Shoal, Dudgeon Offshore Wind Farm extension
- Consideration of the Offshore Ring main solution and the opportunity for early implementation from such projects such as Vanguard and Boreas

Yours Faithfully,

Lucy Sheringham & Paul Haddow