Norfolk Vanguard East Limited
[redacted]

John Wheadon
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Copy to NATS [redacted]

Our Reference: 008002185-01

21/09/2026

Dear John

Re. Norfolk Vanguard Offshore Wind Farm Order 2022 (as amended), Schedule 1 Requirement 34 and Norfolk Boreas Offshore Wind Farm Order 2021 (as amended), Schedule 1 Requirement 34 - NATS Cromer PSR Primary Radar Mitigation Scheme

The Vanguard East offshore wind farm project is being developed by Norfolk Vanguard East Limited (**NVEL**). Following a Transfer of Benefits on 23 March 2023, NVEL is a joint undertaker (with Norfolk Vanguard West Limited) of the Norfolk Vanguard Offshore Windfarm Order 2022 (as amended) (the **Vanguard Order**). NVEL is also a joint undertaker (with Norfolk Boreas Limited) of the Norfolk Boreas Offshore Windfarm Order 2021 (as amended) (the **Boreas Order**). The Vanguard East project implements part of the Vanguard Order and part of the Boreas Order. Wind Turbine Generators (**WTG**) belonging to the Vanguard East project are located within the "Vanguard East" array within the Vanguard Order limits, and within the southern part of the array within the Boreas Order limits.

Schedule 1 Requirement 34 of the Vanguard Order, and Schedule 1 Requirement 34 of the Boreas Order require NVEL to provide appropriate mitigation to prevent or remove any adverse effects on air traffic control services arising from impacts on the Cromer Primary Surveillance Radar (**PSR**). Under these requirements, no WTG may be erected by the undertaker until the Secretary of State has confirmed satisfaction in writing that the appropriate mitigation for the Cromer PSR will be implemented and maintained for the lifetime of the Vanguard East project, and that arrangements are in place to ensure

that the approved mitigation is implemented and in operation. The Secretary of State is required to consult with NATS (En-Route) Plc (**NATS**) before confirming satisfaction.

Schedule 1 Requirement 34(3) defines the "approved mitigation" as a detailed Primary Surveillance Radar Mitigation Scheme (PSRMS) which sets out the appropriate mitigation.

NVEL and NATS have entered into a Mitigation and Services Contract (**MSC**) for delivery of a Primary Radar Mitigation Scheme (**PRMS**) for the Cromer PSR. Under the terms of the MSC, NVEL is required to provide the attached PRMS to the Secretary of State for approval in advance of implementation.

I would be grateful if you would acknowledge receipt of this information and provide a response at your earliest convenience. Please do not hesitate to contact me should you require any clarification.

Yours sincerely,

[redacted]

[redacted] Vanguard West, Vanguard East and Boreas

For and on behalf of NVEL

Enc.

ERECTION OF 92 No.270m HIGH WIND TURBINES & ANCILLARY INFRASTRUCTURE AT NORFOLK VANGUARD EAST OFFSHORE WIND FARM
DEVELOPMENT CONSENT REFERENCE REF: EN010087 andEN010079

PRIMARY RADAR MITIGATION SCHEME FOR THE ADVERSE IMPACTS TO THE PRIMARY SURVEILLANCE RADAR AT CROMER AND ASSOCIATED AIR TRAFFIC OPERATIONS OF NATS (EN ROUTE) PLC ("NATS") (REQUIREMENT 34)

NATS UNIQUE CRM NUMBER 6684

INTRODUCTION

1. A development consent order was granted by the Secretary of State for Business, Energy and Industrial Strategy (the "**Planning Authority**") to:

   1.1 Norfolk Vanguard Limited on 11 February 2022; and

   1.2 Norfolk Boreas Limited on 10 December 2021.

2. Pursuant to:

   2.1 a transfer of benefit which took place on 3 March 2023, Norfolk Vanguard Limited partially transferred part of its development consent order to the Developer; and

   2.2 a transfer of benefit which took place on 3 March 2023, Norfolk Boreas Limited partially transferred part of its development consent order to the Developer.

3. Each development consent order included the following requirements:

   Cromer Primary Surveillance Radar

   34(1) No erection of any wind turbine generator forming part of the authorised development may commence until the Secretary of State having consulted with NATS has confirmed satisfaction in writing that appropriate mitigation will be implemented and maintained for the lifetime of the authorised development and that arrangements have been put in place with NATS to ensure that the approved mitigation is implemented and in operation prior to erection of the wind turbine generators.

   (2) The undertaker must thereafter comply with all other obligations contained within the approved mitigation for the lifetime of the authorised development.

   (3) For the purposes of this requirement—

   (a) "**appropriate mitigation**" means measures to prevent or remove any adverse effects which the operation of the authorised development will have on NATS' ability to provide safe and efficient air traffic (surveillance and control) services/operations during the lifetime of the authorised development in

respect of which all necessary stakeholder consultation has been completed by NATS and all necessary approvals and regulatory consents have been obtained;

(b) "**approved mitigation**" means the detailed Primary Surveillance Radar Mitigation Scheme setting out the appropriate mitigation approved by the Secretary of State and confirmed in writing in accordance with sub-paragraph (1);

(c) "**NATS**" means NATS (En-Route) Plc or any successor body;

(d) the "**lifetime of the authorised development**" means the period ending when the wind turbine generators are finally decommissioned and removed.

4. NATS is the provider of en route Air Navigation Services for United Kingdom Airspace. NATS is regulated by the Civil Aviation Authority and has a duty under licence to provide safe and efficient air traffic management operations. The Developer accepts that without appropriate technical mitigation measures, the development will cause an unacceptable impact on the primary radar of NATS located at Cromer and associated air traffic control operations.

5. The developer has been in discussions with NATS regarding potential mitigation for the adverse aviation impacts of the development. This document is the Primary Radar Mitigation Scheme for the purposes of the above requirements in respect of the development consent order.

MITIGATION SCHEME REQUIREMENTS

6. The Developer shall not commence erection of any wind turbine generator forming part of the authorised development until the relevant Planning Authority (following consultation with NATS) has provided written confirmation that the later of the following has occurred:

6.1 the technical mitigation measures described at Annex 1 (**"Mitigation Measures"**) to this document have been fully installed and integrated into NATS' infrastructure and validated by NATS;

6.2 arrangements have been entered into with NATS for the on-going maintenance, management, renewal update and decommissioning of the Mitigation Measures throughout life of the wind farm at the Developer's expense and until such time as the wind turbine generators have been permanently dismantled. Such arrangements shall effectively bind future operators and owners of the development and include reasonable security for the performance of the developer's obligations.

7. Following the discharge of each of the requirements at paragraph 6 and at least four (4) weeks prior to the first blades being fitted to any turbine, the Developer shall provide the Planning Authority (and copied to NATS - contact details below) with a schedule of intended dates for blades to be fitted to each turbine and for each turbine to be first operated. If any of the dates will be materially different from those set out in the submitted schedule, then notice of the revised date(s) shall as soon as reasonably practicable be provided to the Planning Authority in writing by the Developer (copied to NATS).

8. The turbines shall not be sited outside of the design zone set out at Annex 2 (*Turbine Co-ordinates*) without the prior consent of the Secretary of State (following consultation with NATS).

9. The Developer shall not operate any of the turbines in any period unless it has procured through arrangements with NATS that the Mitigation Measures are provided, maintained, managed, renewed, updated and decommissioned as necessary for the life of the operation of the development (or any part thereof) at the Developer's expense unless the Planning Authority confirms in writing following consultation with NATS that such Mitigation Measures are no longer required.

10. The turbines shall not be operated by any person other than Norfolk Vanguard East Limited (Company Number 12476373) of Windmill Hill Business Park, Whitehill Way, Swindon, Wiltshire, SN5 6PB unless the Planning Authority has confirmed in writing that it is satisfied that such person has entered into direct arrangements with NATS for the long term provision, maintenance, management, renewal, update and decommissioning of the Mitigation Measures (save where the Planning Authority has confirmed in writing following consultation with NATS that such arrangements are no longer required).

11. In the event that mitigation is no longer required and in any event when all of the turbines have permanently ceased operation and been removed from the site, the Developer shall arrange for the decommissioning of the Mitigation Measures at its expense.

NATS contact details:

NATS (En Route) plc Safeguarding Department
NATS
[redacted]

SIGNED FOR AND ON BEHALF OF NORFOLK VANGUARD EAST LIMITED:
NAME: [redacted]

[redacted]

[redacted] Vanguard West, Vanguard East and Boreas
DATE: 21/09/2026

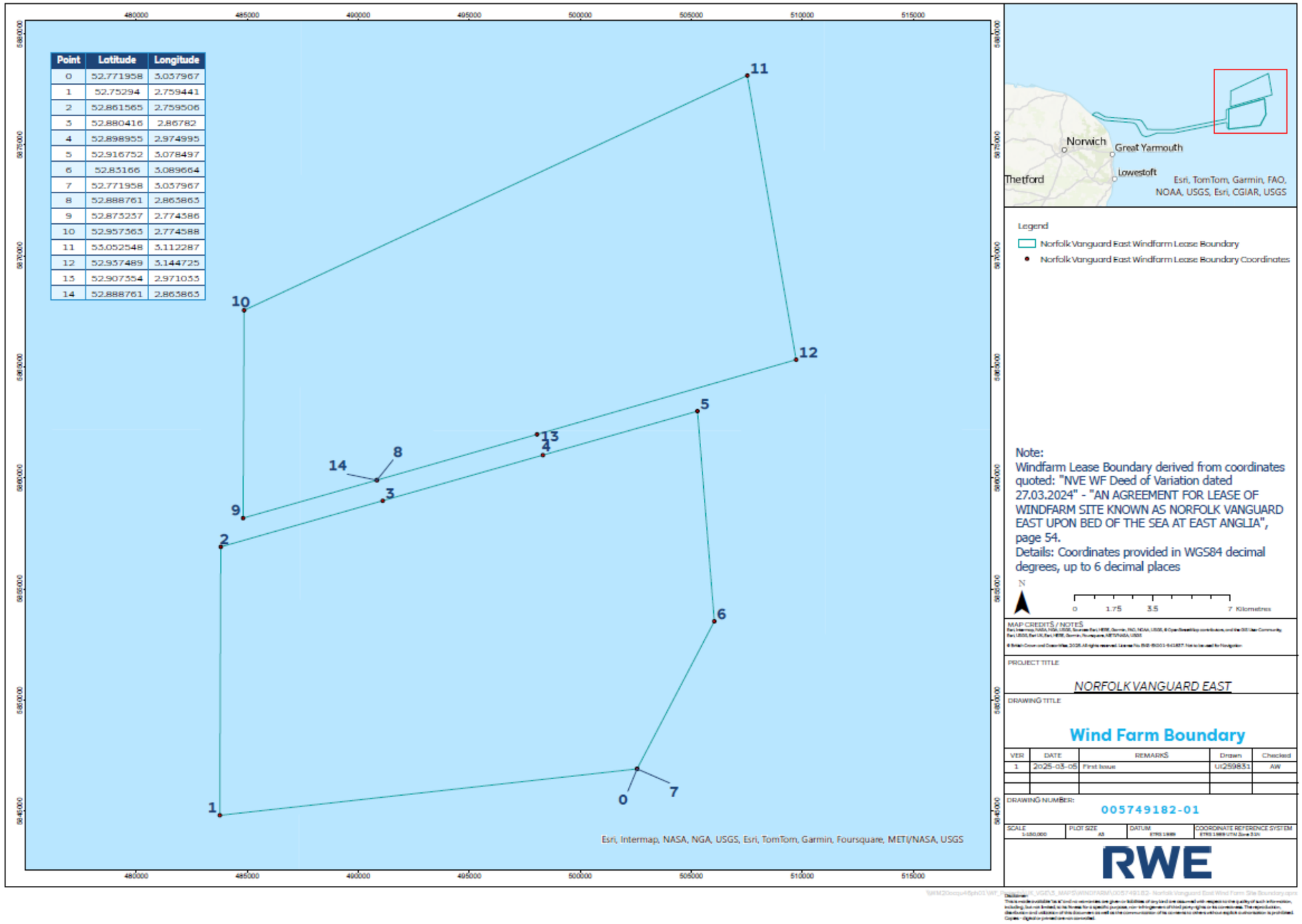
PRMS ANNEX 1
Mitigation Measures

The implementation, maintenance, management, renewal and update of a mitigation solution for the impacts of the development on the primary radar of NATS at Cromer and associated air traffic management operations through the creation of a plot suppression zone, along with performance of the relevant obligations under the ACP Contracts, integrated into the infrastructure of NATS in relation to the airspace affected by the development, as may be amended or upgraded where reasonably required.

PRMS ANNEX 2
Turbine Co-ordinates

Note: NATS understands that the Developer is not able to provide turbine co-ordinates at this stage but the Developer acknowledges that the turbine co-ordinates provided will be within the boundary edged blue and bounded by the co-ordinates in the Site Plan.

PRMS ANNEX 3
Site Plan



Norfolk Vanguard East Limited, [redacted]
VAT number: GB359053976
Reg number: 12476373