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16 April 2026

Dear ██████████,

**Norfolk Boreas Offshore Wind Farm Order 2021 (“the Norfolk Boreas Order”)**

**Norfolk Vanguard Offshore Wind Farm Order 2022 (“the Norfolk Vanguard Order”)**

**Approval of the Benthic Compensation Progress Report 2025 under Paragraph 32, Part 3 of Schedule 19 to the Norfolk Boreas Order and Paragraph 32, Part 3 of Schedule 17 to the Norfolk Vanguard Order**

## **1. Introduction**

- 1.1. The Norfolk Boreas Order and the Norfolk Vanguard Order (“the Orders”) contain requirements that the undertaker must comply with in relation to the monitoring of the approved compensation measures for benthic ecology.
- 1.2. Paragraph 32 of Part 3 of Schedule 19 to the Norfolk Boreas Order and Paragraph 32 of Part 3 of Schedule 17 to the Norfolk Vanguard Order states that:

*“Results from the monitoring scheme must be submitted at least annually to the Secretary of State, the MMO and the relevant statutory nature conservation body. This must include details of any findings that the measures have been ineffective in securing an improvement in the condition of the HHW SAC [Haisborough, Hammond, and Winterton Special Area of Conservation] and, in such case, proposals to address this. Any proposals to address effectiveness must thereafter be implemented by the undertaker as approved in writing by the Secretary of State in consultation with the MMO and the relevant statutory nature conservation body.”*

- 1.3. On 27 January 2026, RWE (“the Undertaker”) submitted a request for the approval of the Benthic Compensation Progress Report 2025 (“the Monitoring Report”). This builds on the 2024 Monitoring Report.
- 1.4. This submission also follows the approval of a Non-Material Change to the Orders on 18 December 2025, which establishes a process for implementing adaptive management via the Marine Recovery Fund (“MRF”) for the Norfolk Vanguard Order. Under these provisions, the Secretary of State confirmed that the Adaptive Management Strategy as submitted by the Undertaker in which the proposed use of the MRF as an adaptive management measure is an acceptable means of delivering the remaining 6.99 hectares (“ha”) of compensation in substitution for the original benthic compensation requirements under the Norfolk Vanguard Order.

## **2. Representations**

- 2.1. The Secretary of State notes that the Undertaker consulted the Norfolk Projects Benthic Steering Group (“BSG”) on multiple occasions during 2025 in relation to benthic compensation progress. He further notes that a draft of the Monitoring Report was circulated to the BSG on 1 December 2025, and that all members confirmed they were content for the report to be submitted to DESNZ for determination, with no comments on the overall approach.
- 2.2. Given that the Undertaker is implementing the same benthic compensation measures as those undertaken in 2024, the Secretary of State is satisfied that the level of consultation with the BSG is appropriate to inform his decision on this submission.

## **3. The Secretary of State’s consideration of the Monitoring Report and the Representations**

- 3.1. The Secretary of State has considered the Monitoring Report as submitted by the Undertaker.
- 3.2. The Secretary of State notes that, in accordance with the commitments secured within the approved Benthic Implementation and Monitoring Plan (“BIMP”), the Undertaker has delivered benthic compensation through two strands: (i) marine debris removal and (ii) education and awareness measures to prevent further debris entering the marine environment.
- 3.3. Pursuant to the Secretary of State’s approval of the 2024 Benthic Compensation Progress Report on 26 March 2025, the Undertaker has continued Work Stream 4 (beach cleans), delivered in partnership with Keep Britain Tidy and Norfolk Beach Cleans, and expanded this activity during 2025. This resulted in the removal of 5,238 kg of debris in 2025, equivalent to 1.24 ha. The Undertaker therefore proposes that this 1.24 ha be applied towards the 2.4 ha benthic compensation requirement under the Norfolk Boreas Order.
- 3.4. Notwithstanding these outcomes, the Secretary of State notes that overall Strand 1 debris removal has not met the success criteria specified within the BIMP. In response, adaptive management has been triggered. As set out above, the MRF will be utilised to address compensation shortfalls under the Norfolk Vanguard Order, while continued debris removal will be pursued in 2026 to address the remaining 1.16 ha of compensation required under the Norfolk Boreas Order.

- 3.5. The Secretary of State welcomes the progress made in relation to Strand 2 commitments through the delivery of Fishing Gear Recycling Days. Two events held in 2025 resulted in the collection of over 3.8 tonnes of fishing gear, of which more than 2.1 tonnes were recycled, thereby reducing the risk of abandoned, discarded or lost fishing gear entering the marine environment. These initiatives have also generated learning to inform the delivery of further events planned for 2026.
- 3.6. Having considered all the information before him, the Secretary of State is satisfied that the Benthic Compensation Progress Report 2025 complies with the requirements of paragraph 32 of Part 3 of Schedule 19 to the Norfolk Boreas Order and paragraph 32 of Part 3 of Schedule 17 to the Norfolk Vanguard Order to submit annually the results of the monitoring scheme, including any findings of ineffectiveness.
- 3.7. The Secretary of State therefore **approves** the Benthic Compensation Progress Report 2025 in accordance with paragraph 32 of Part 3 of Schedule 19 to the Norfolk Boreas Order and paragraph 32 of Part 3 of Schedule 17 to the Norfolk Vanguard Order.

Yours sincerely,



Head of Environment Delivery

Department for Energy Security & Net Zero