

From: [Naomi Goold](#)
To: [East Anglia Three](#)
Cc: [Boyd, David](#); [Alison.sidgwick](#); [Laura Stally](#); [Sarah Strong](#); [Philip Ridley](#); [Lisa Chandler](#); [James Cutting](#); [Graham Gunby](#); [Georgia Teague](#)
Subject: East Anglia THREE (EN010056) - ESC and SCC Response
Date: 23 September 2020 13:49:18
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[ESC_SCC_Response_EA3_Windfarm_NMC_-_23.09.2020.pdf](#)

Dear Sir/Madam,

Please find attached East Suffolk Council's and Suffolk County Council's joint response to the consultation on the proposed East Anglia Three Non Material Change.

Kind regards

Naomi



**Naomi Goold BSc (Hons) MA MRTPI |
Senior Energy Projects Officer**

East Suffolk Council

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www.eastsuffolk.gov.uk

East Suffolk Council will continue to review and prioritise the delivery of its services during this unprecedented time.

The COVID-19 outbreak will severely impact what we are able to do, however we will continue to support and protect our communities, delivering the critical services you need.

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National Infrastructure
 The Planning Inspectorate
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 BS1 6PN

Date: 23 September 2020
 Your Reference: East Anglia Three EN010056
 Enquiries to: Georgia Teague / Naomi Gould

Email: Georgia.Teague@suffolk.gov.uk /
naomi.gould@eastsuffolk.gov.uk

EastAngliaThree@planninginspectorate.gov.uk

Dear Sir/Madam,

THE EAST ANGLIA THREE OFFSHORE WIND FARM ORDER 2017 (AS AMENDED) - APPLICATION FOR A NON-MATERIAL CHANGE 2020

Thank you for consulting Suffolk County Council (SCC) and East Suffolk Council (ESC) on the application of a Non-Material Change for The East Anglia Three Offshore Wind Farm. The letter comprises the joint response from SCC and ESC (hereafter referred to as ‘the Councils’).

The Councils note that the Non-Material Change application seeks consent to undertake the following changes to the Offshore Substation Stations (OSS) and Wind Turbine Generators (WTG) set out in the table below:

Proposed Changes in OSS Parameters	Proposed Changes in WTG Parameters
<ul style="list-style-type: none"> • Reduction in the number of OSSs from 6 to 1; • Increase in the number of pin piles per OSS jacket leg from 1 to 4; and • Increase in the number of legs of the OSS from 4 to 6. 	<ul style="list-style-type: none"> • Increase in the maximum tip height of 247 m to 262 m (relative to Lowest Astronomic Tide); • Increase in the minimum air draft of all WTGs from 22 m to 24 m (relative to Mean High Water Springs); • Increase in maximum rotor diameter from 220 m to 230 m; and • Reduction in the maximum, total number of WTGs from 172 to 121.

The materiality of the amendments sought will be considered by the Secretary of State, but they must be considered alongside the amendments sought under the Non-Material Change application which was granted on 6 June 2019. The changes consented by the 2019 application are outlined below:

- Increase the maximum electricity generating capacity from 1,200MW to 1,400MW;
- Amend paragraph 8(3) of requirement 3 of the 2017 Order to allow more flexibility in delivery of the two offshore phases; and
- To limit the maximum number of gravity base foundations to 100.

Based on the information provided by the Applicant with their submission, the Councils have no specific comments regarding the identified alterations proposed to the OSS and WTG parameters. The Applicant's conclusions that the 15m increase in the blade tip height of the turbines would not be discernible and the visibility of the turbines would continue to be limited, and therefore the conclusions of the seascape, landscape and visual impact assessment would remain unchanged, is accepted.

The Councils do, however, have some further comments to make regarding the Non-Material Change which it is considered should be considered alongside specific comments received regarding the acceptability of the parameter changes.

The Councils recognise the significant role offshore wind has in helping the UK to achieve the Government's net zero target on greenhouse gas emissions by 2050. The Offshore Wind Sector Deal in March 2019 suggested a contribution of 40GW by 2030 but the Committee on Climate Change suggested in its report in 2019 that 75GW by 2050 is likely to be required. Even higher amounts of capacity were identified as potentially necessary by 2050 in National Grid Electricity System Operator's Future Energy Scenarios 2020. It is therefore evident that, in order to achieve this level of installed capacity, not only is a coordinated offshore connections network essential but the significant contribution required from offshore wind in order to meet the net zero target requires existing and proposed projects to be as resource efficient as possible. This is vital for those communities which are adversely affected and have to live with the impacts by the onshore infrastructure associated with offshore wind developments.

The Councils have already had experience of a Non-Material Change in relation to East Anglia One Offshore Wind Farm being necessary following a Contract for Difference auction, which resulted in a reduction in the capacity of the scheme. Although the electrical output of the scheme was reduced by over one third, this did not result in one third reduction in the size and scale of the onshore infrastructure. Local communities have had to accept the same level of impact for a lower amount of electricity generation.

The Councils therefore want the Planning Inspectorate and Secretary of State to fully understand the current and future implications of the Non-Material Change proposed prior to any recommendation or decision being made.

The Applicant has stated there is no commitment to reduce the offshore order limits so it is not clear whether the reduced number of turbines will be spread over the same area or whether they would be condensed into a smaller area of seabed. The efficiency of use of finite resources such as seabed should be a consideration when determining the Non-Material Amendment.

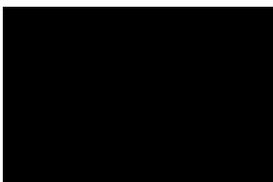
The Councils are, however, concerned that if the turbines are confined to a smaller area, this seabed could then become available for a later extension project, which would result in further onshore infrastructure to the detriment of local communities and the environment.

The best solution for the Councils would be the maximisation of the electricity generation from the project and seabed in order to help to deliver net zero targets, whilst minimising the impacts on local communities and the environment from the onshore connection infrastructure. There should be a requirement on the Applicant to justify whether the option to increase the electricity generating capacity of the installation whilst utilising the same area of seabed has been explored. This would be subject to there being no adverse material changes to the onshore infrastructure.

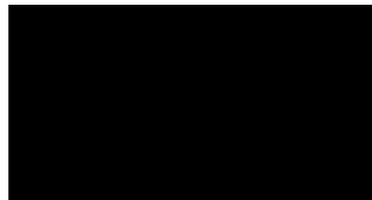
The Councils wish to reiterate that it is essential that the full implications of the Non-Material Change proposed is fully and comprehensively understood prior to any decision being made. It is essential that this consideration extends beyond the specific parameter changes proposed and considers the future implications of these changes, which could have significant effects on local communities and the onshore environment.

If there is anything that we have raised that you would like to discuss, please use the contact information at the top of this letter.

Yours faithfully,



James Cutting
Head of Planning
Suffolk County Council



Philip Ridley BSc (Hons) MRTPI
Head of Planning and Coastal
Management
East Suffolk Council