



East Anglia Three Case Team
Planning Inspectorate
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(Email only)

Planning Inspectorate reference: EN010056
MMO reference: DCO/2013/00014
30 September 2020

Dear Sir or Madam,

Non-Material Change Application to East Anglia Three Offshore Windfarm Order 2017

On 16 July 2020 the Marine Management Organization (MMO) received notice that East Anglia Three Offshore Windfarm Limited (EATL) have submitted a non-material change application to The Department for Business, Energy and Industrial Strategy (BEIS) to make changes to the East Anglia Three Offshore Windfarm Order 2017. The changes to the development consent order (DCO) as amended are in relation to the offshore works for East Anglia Three Offshore Windfarm only. This document comprises the MMO's comments in respect of this non-material change application.

The non-material changes being sought are as follows:

The changes in Offshore Substation (OSS) parameters subject to the Non-Material Change (NMC) application are:

- Reduction in the number of OSS's 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.

The changes in Wind Turbine Generator (WTG) parameters subject to the NMC application are:

- 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 WTG's 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 WTG's from 172 to 121

General Comments

1. The number of turbines has been reduced from 172 to 121, however the MMO notes that the amount of scour has not reduced accordingly. This suggests that the amount of scour used at each turbine location could increase. This would increase the footprint of impact at each turbine location and may have implications for changes in coastal processes and



subsequent changes in benthic communities. However, the changes indicated in Table 3.1 of the NCM Report (rev 1) suggests that scour protection will be less than originally assessed. The scour protection required should therefore be adjusted accordingly in line with the reduction in the number of turbines.

2. The number of OSS are being reduced from six to one, but the number of legs increased from four to six. Whilst this is a significant reduction, there has not been an associated reduction in the amount of scour protection required. This should also be reduced accordingly as increasing the amount of scour protection for one OSS could significantly change the coastal processes and subsequently the benthic ecology within this smaller area.
3. The number of pin piles per leg will increase from one to four. Taking into consideration that the number of legs per OSS is increasing from four to six, this equates to 24 pin piles which is equivalent to the original assessment for six OSS but restricted to a smaller area due to the reduction in the number of OSS. It is not clear from the reports whether the pin piling will result in any spoil and if so where this will be deposited.
4. The MMO has concerns regarding the potential re-distribution of scour protection (presuming the maximum area of scour remains the same) as this may change physical processes, which could ultimately change the benthic communities. It is not clear if this has been considered and whether a modification to the scour protection area should be changed to reflect the reduction in both WTG's and OSS's.
5. The MMO notes that the figure (100,800 m²) associated with the NMC amendment with respect to the total area of scour for the offshore electrical stations presented in the DCO NMC report (rev 1), does not match that presented in the East Anglia Three Offshore Wind Farm Order 2017 - NMC amendment July 2020. For both Schedules 12 and 13, part 2, condition 6, it currently states that 'the total amount of scour protection for the electrical stations forming part of the authorized scheme must not exceed 50,400 m².' The MMO recommend that this is reviewed and clarified.
6. The proposed spacing between WTGs is unchanged, suggesting that no material change in impact on regional hydrodynamics (waves and currents) is expected - the changes will result in a reduction in overall sea surface area affected. However, Table 3.1 within NMC Report (rev 1) indicates that the worst-case scenario assessed in the Environmental Statement (ES) was 100 x WTG on 12m foundations, while also suggesting that the NMC will involve 121 x WTG on 12m foundations which would exceed the assessed worst-case scenario. Table 2.1 does not indicate this increase in foundation size and the MMO recommend that clarification is sought on this matter.
7. In the case that the monopile diameters are increased, the MMO would expect to see the impact on hydrodynamics of the larger monopiles detailed within this application. The increase in associated drag is likely to lead to a larger impact on waves and tidal currents than was originally assessed. In combination with changes to the scour protection area, these changes may lead to changes in physical processes which may differ to those originally assessed in respect of areal extent and magnitude. The application should demonstrate that the assessment of cumulative impacts (with the numerous other OWF developments in this area, including EA1 and the potential future EA1N and EA2) is not materially altered i.e., whether there is potential for more



significant overlap of hydrodynamic impacts. The MMO suggests this is considered and the report updated.

8. The MMO notes that in Table 3.1 of the NMC report, the ES presented assessment is of 172 x 10m monopiles and that the change to 121 x 12m monopiles leads to an increase in drill arisings. The NMC report notes that the area of affected sea bed remains only 0.08% of sea bed area, so in this sense there is no material change to the assessment of the ES. The volumetric increase in drill arisings is not quantified in the application. However, the report indicates that there will be no changes to the volumes of disposal – this appears slightly contradictory, so the quantities generated and disposed should be clarified in the application.

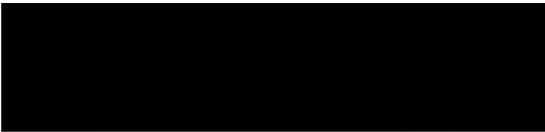
Conclusion

The MMO requests that the applicant reviews the MMO comments above and provides clarifications regarding scour protection volumes and the impacts of using larger diameter monopoles.

The non-material change application proposed will necessitate an application to the MMO to vary the deemed marine licences (DMLs).

The MMO received a request to vary the DMLs on 16 July 2020 and is currently processing this. The Planning Inspectorate will be consulted on the DML variation in due course.

Yours Sincerely



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