

We thank you for inviting The Crown Estate to make additional comment on our previous response to the Outer Dowsing Offshore Wind (Generating Station) ExQ1 OG1.2 (REP4-051) which is attached for reference. The clarifications we provided in this response to the ExA on buffer/separation distances and wake effects remain valid and applicable to the Morgan Generation Assets.

We would like to highlight the following points made in this response regarding expectations on wake effect assessments which should be considered together in their full context:

"The report summarises modelling applied to generic/hypothetical wind farms and does not replace the need for project-specific analysis

The published report included findings on inter-farm wake effects for generic scenarios. As with any technical evidence, this can be beneficial to the sector to inform decision-making and analysis; appropriate selection and application of this or other studies and evidence to specific projects is for developers to determine"

To reiterate - it is our expectation that developers should consider when it is appropriate to undertake project-specific assessments, and the appropriate scope of these, as part of their site selection, design, and other development activity based on the individual project locality and characteristics.

Please see below The Crown Estate's response to Outer Dowsing Offshore Wind (Generating Station) Examination - Question ExQ1 OG 1.2 of the Examining Authority's written questions and requests for information, issued on 6<sup>th</sup> November 2024.

1. Can the Crown Estate clarify if the minimum 7.5km distance requirement between Leasing Round 4 projects takes the potential for wake effects into account?

- The buffer/stand-off between wind farms (unless developers consent to closer proximity) is a separation distance to enable developers to develop, operate and maintain wind farms by allowing for a range of factors including amongst other matters, wake effects, navigation, and safety.
- The 2019 Information Memorandum ahead of Offshore Wind Leasing Round 4 set out the requirement that "Projects may not be located within 7.5 km of an existing offshore wind farm (meaning a wind farm at any stage of development which has been awarded an agreement for lease or lease from The Crown Estate) unless the owner of the existing offshore wind farm has given its written consent".
- This 7.5km was used for the purpose of processing project proposals in the tender only, being higher than the 5km buffers that are specified within the seabed lease agreements (introduced in Round 3); this was for the purpose of de-risking the Round 4 tender by providing additional mitigation and assurance to participants through limiting proximity.
- The Crown Estate acknowledges that inter-farm wake effects can extend beyond these buffer distances. TCE also notes that the spatial and temporal variability of wind speed means that it is complex to accurately predict the wake impact on nearby wind farms, which may depend upon factors beyond distance – e.g. prevailing wind direction and wind farm layout.
- The location of a wind farm within an area of seabed leased from The Crown Estate is for developers to decide and design for, subject to obtaining the necessary consents and The Crown Estate's approval.

2. The Crown Estate is invited to comment on the purpose of the Offshore Wind Leasing Programme Array Layout Yield Study and any implications for the project.

- As outlined in the Introduction section of the Offshore Wind Leasing Programme Array Layout Yield Study by Frazer-Nash published on the Marine Data Exchange in November 2023: "The objective of this present study is to provide generic evidence to support TCE's design of future offshore wind leasing programmes from an aerodynamic loss perspective. Specifically, the influence of key PDA (project development area) design parameters on wind farm production are assessed using an updated engineering wake model with more realistic accounting of farm-to-farm wake and farm blockage effects"
- The report summarises modelling applied to generic/hypothetical wind farms and does not replace the need for project-specific analysis.

- The published report included findings on inter-farm wake effects for generic scenarios. As with any technical evidence, this can be beneficial to the sector to inform decision-making and analysis; appropriate selection and application of this or other studies and evidence to specific projects is for developers to determine.
- As this report was completed during 2023 it has no direct link to the buffer zones set out in the 2019 Information Memorandum for Offshore Wind Leasing Round 4.