



National Infrastructure Planning
The Planning Inspectorate
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Date: 12 May 2021
Your Reference: East Anglia One (EN010025)

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Dear Sir/Madam,

The East Anglia One Offshore Wind Farm Order 2014 (as amended) – Application for Non-Material Change

Thank you for consulting East Suffolk Council (ESC) on the application for a Non-Material Change (NMC) to the East Anglia One Offshore Wind Farm (EA1) Development Consent Order (DCO).

ESC notes that the NMC application seeks consent to:

- Reduce the number of Wind Turbine Generators (WTGs) in the consent from up to 150 to 102 which is reflective of the number of WTGs installed under the DCO.
- Reduce the maximum number of WTGs with gravity base foundations to 102 for HVAC.
- Reduce the maximum height of WTGs from 200m to 188m.
- Reduce the maximum hub height of the WTGs from 102m to 111m.
- Reduce the rotor diameter of the WTGs from 170m to 154m.
- Increase the minimum clearance height of the WTGs from 22m to 28m.

It is understood that the NMC seeks to amend the DCO to reflect the 'as built' parameters of the WTGs for the EA1 project rather than the parameters of the maximum Rochdale envelope originally approved in the DCO. ESC recognises that given the offshore elements of the EA1 project have already been constructed, the granting or not granting of this NMC will not change the constructed EA1 project parameters.

It is also noted that a parallel application will be made to the Marine Management Organisation to seek corresponding variations to the Deemed Marine Licences.

There is no statutory definition of what constitutes a material or NMC to a DCO and this is a matter for the Secretary of State to determine, however relevant criteria to consider has been outlined within the Department for Communities and Local Government (DCLG) 'Guidance on Changes to Development Consent Orders'. The Applicant has considered the four factors which have been identified in the guidance which include the effect the changes on the Environmental Statement (ES), Habitat Regulations Assessment (HRA), compulsory acquisition and the local populations. Based on the information provided in support of the NMC application, ESC accepts the Applicant's conclusions set out in Section 3 of the Supporting Statement submitted with the application in so far as they relate to onshore matters.

In addition to the consideration of the effect of the changes in relation to the ES, HRA, compulsory acquisition and the local populations, the DCLG guidance indicates that 'the 'cumulative effect of previous changes made to the Development Consent Order may also be relevant when considering whether a further application for change should be treated as a new project". The East Anglia One Offshore Wind Farm (Corrections and Amendments) Order 2016 granted on 24 March 2016 permitted the following amendments to the development:

- Correction of some errors within the 2014 DCO
- Allowance of the construction of either a wind farm up to 750MW with a HVAC transmission system comprising up to 150 WTGs or a wind farm of 1200MW with a HVDC transmission system comprising up to 240 WTGs. The change to the HVAC transmission system included the need for an increase in the height of the electrical equipment at the onshore substation.

The Secretary of State was satisfied in 2016 that the changes outlined above were not material. ESC accepts that even when the previous NMC is considered in-combination with the current NMC this is unlikely to result in the determination by the Secretary of State this this proposal comprises a material change.

Although not relevant in relation to the current application, the previous NMC granted in 2016 resulted in the electrical output of the scheme being reduced by a third, this did not result in a one third reduction in the size and scale of the onshore infrastructure. The local communities and onshore environment have therefore had to accept the same level of impact for a lower amount of electricity generation.

ESC recognises the significant role offshore wind has in helping the UK to achieve the Government's net zero target on greenhouse gas emissions by 2050. It is 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.

As stated previously, although the current NMC whether granted or not granted would not change the development that has been constructed, ESC considers that it is important to emphasis to the

Applicants and other future developers the importance of optimising the use of resources to help maximise the benefits of renewable energy whilst minimising the environmental and social harm.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Philip Ridley', with a large, sweeping flourish underneath.

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