

Secretary of State for Energy Security and Net Zero
c/o National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

07 August 2025

Five Estuaries Offshore Windfarm Application

Application Ref: EN010115

East Anglia Two Offshore Wind Farm

Dear Secretary of State

We have engaged in the Five Estuaries Offshore Wind Farm Examination and, in particular, raised the potential wake effects that the project would have on the consented East Anglia Two project which has the benefit of a CfD and is about to start construction. During the course of the Examination, we recommended to the Examining Authority that they should recommend to you that a requirement should be added to the Development Consent Order to ensure that wake effects were properly evaluated and mitigated.

Since the Examination closed, you have determined the Mona Offshore Wind Farm application and decided that that DCO should incorporate a wake effects requirement. We have carefully considered the requirement which was imposed. Although we welcome the policy intent and clear recognition that wake effects are a material issue that should be addressed, we have concerns regarding the specific drafting of the text in Requirement 29(2). In particular, the Requirement includes the following:

"Whilst maximising the capacity of the authorised development within the identified technical, environmental and other constraints of the authorised development"

This is a critical piece of text in that it provides the balance in terms of the overall requirement to mitigate. We consider that the test that has been set out in the Mona Requirement is imprecise and not sufficiently certain, as it is not clear how the Secretary of State can ascertain the "technical, environmental and other constraints" of the authorised development or whether the capacity of the authorised development is maximised in this context. The undertaker is the only party who is able to ascertain the precise constraints and capacity of the development. This part of the Requirement is therefore inappropriate and fails to meet established tests.

We propose alternative text which would replace this text and suggest the use of the following words:


"minimise wake effects on the East Anglia two offshore wind farm without significantly reducing the capacity of the authorised development"

This change in text gives much greater certainty and ensures the assessment remains within the ambit of the Secretary of State's discretion.

We sought to engage with the Applicant in relation to the wake effect issues during the course of the Examination. At no stage did the Applicant seek to engage in any meaningful way, either with ourselves or the Examining Authority in relation to the matter. We note the comments that you made in relation to the Mona decision with regard to parties' conduct. We consider that, in light of this, it would be important to ensure that the requirement encourages and promotes active engagement between the party proposing the new project and the waked project. This would ensure that you have the best information at the point of discharge. You should quite rightly expect parties that promote NSIP scale offshore wind farm projects to co-operate with others when you are having to make decisions. In that respect we have added a new sub-paragraph (2)(b) which requires a wake effects assessment to be submitted at the time of discharge. It is inevitable that such an assessment would be required to understand the extent to which the mitigation had been successful. We have also introduced a requirement for the undertaker to provide you with information regarding the engagement that they have had with us. It is considered that this change would facilitate engagement, and ensure that you had the best information at the time of discharge. It would also ensure that proper engagement took place in advance of the discharge rather than the waked entity only being engaged at that point in time. It would therefore be more efficient and ensure that the best information was also available to the undertaker.

We recognise that decision making on Five Estuaries is imminent but felt it appropriate for us to raise these issues now as we have not had an opportunity in this Examination or the subsequent correspondence to engage with you on the terms of the Requirement.

We attach a full copy of the requirement we would propose is included in the Five Estuaries Development Consent Order as an Annex to this letter.

Yours faithfully 



Offshore Managing Director, ScottishPower Renewables (UK) Ltd
Director, East Anglia Two Ltd

ANNEX

REVISED WAKE EFFECT REQUIREMENT

Wake effects

X.-(1) No part of any wind turbine generator may be erected as part of the authorised development until either—

(a) A wake effects plan has been submitted to and approved by the Secretary of State following consultation with East Anglia Two Limited; or

(b) The undertaker has provided evidence to the Secretary of State that alternative mitigation for wake effects has been agreed with East Anglia Two Limited.

(2) The wake effects plan provided in accordance with paragraph (1)(a) must include:

(a) details of reasonable steps that have been taken by the undertaker in the final design of the authorised development to minimise wake effects on the East Anglia Two offshore windfarm without significantly reducing the capacity of the authorised development; and

(b) an updated wake effects assessment showing the modelled wake effect of the proposed final design on the East Anglia Two Offshore Wind Farm; and

(c) details of consultation with East Anglia Two Limited and the extent of any agreement or disagreement with them on

(i) whether any design changes could further reduce the wake effect impacts; and

(ii) the conclusions of the updated wake effects assessment under paragraph 2(b).

(3) Where paragraph 1(a) applies, the wake effects plan must be implemented as approved and [tie into any design plan required by other parts of DCO]

(4) For the purposes of this requirement—

“East Anglia Two Limited” means East Anglia Two Limited or such other party which has the benefit of constructing and operating the offshore wind turbines authorised by the East Anglia Two Offshore Wind Farm Order