

Date: 20 August 2025

T: 0333 880 5306

E: fiveestuaries@rwe.com

Application reference: EN010115

Document Ref: 006283329-01

John Wheadon
Head of Energy Infrastructure Planning Delivery & Innovation
Energy Infrastructure Planning Team
Department for Energy Security and Net Zero
3-8 Whitehall Place
London SW1A 2AW
energyinfrastructureplanning@energysecurity.gov.uk

Cc: The Planning Inspectorate Case Team fiveestuaries@planninginspectorate.gov.uk

Dear Sir

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010

Application by Five Estuaries Offshore Wind Farm Limited (“the Applicant”) for an Order granting Development Consent for the proposed Five Estuaries Offshore Wind Farm (“the Five Estuaries Offshore Wind Farm Project”)

The Applicant refers to the letter issued to the Applicant and All Interested Parties on 14 August 2025 which invited comments on the responses submitted further to the Secretary of State’s consultation letter dated 11 July 2025.

One of the documents published on the Planning Inspectorate website as part of the responses to the Secretary of State’s consultation was a letter from Scottish Power Renewables (SPR) dated 7 August 2025 on the subject of wake effects.

The Applicant notes that the Secretary of State has not himself raised any questions on the topic of wake effects i.e. it was not a topic raised in his consultation letter of 11 July 2025. It was the Applicant’s reasonable assumption that the Secretary of State did not, accordingly, consider that further submissions or clarifications were required on this subject. The Applicant does not therefore consider it appropriate for SPR’s letter to have been published

PHONE: 0333 880 5306

EMAIL: fiveestuaries@rwe.com

WEBSITE www.fiveestuaries.co.uk

REGISTERED Five Estuaries Offshore Wind Farm Ltd

OFFICE: Windmill Hill Business Park

Whitehill Way, Swindon, Wiltshire, SN5 6PB

COMPANY NO: Registered in England and Wales company number 12292474

as part of the responses to the Secretary of State's consultation (and identified on the Planning Inspectorate website as such), when no such response from SPR on this matter was sought, and given that the letter itself does not purport to be a response to the consultation letter.

As SPR's letter has, notwithstanding the points noted above, been published alongside the other responses to the Secretary of State's consultation, to which the Applicant and other Interested Parties have been invited to comment upon, the Applicant is compelled to interpret the Secretary of State's letter of 14 August 2025 as a request to comment on the SPR letter. The Applicant is concerned at the procedural fairness of being asked to respond to an unsolicited letter on wake effects in these circumstances. In relation to the recent Mona and Morgan applications, the Secretary of State raised specific questions during the Decision stage in relation to wake effects and it was possible for the relevant Applicant to understand the context and intent of the Secretary of State's request. Here, there is no indication of whether the Secretary of State has an independent and substantive interest in further submissions on wake effects (and if so, in what particular respects) or whether for procedural reasons he simply feels it is safer to invite the Applicant to respond, even though he does not have such a substantive interest in further submissions.

The Applicant's assumption was (and continues to be) that the Secretary of State had concluded that no wake effects requirement was justified (which has been, and remains, the Applicant's position throughout) on the basis that the Secretary of State had not put forward drafting for consultation or sought any further information on wake effects.

In dealing with this situation, the Applicant has little choice but to prepare a substantive response to the SPR submission, but is concerned that by doing so this is open to misinterpretation. The Applicant would not normally have to make submissions solely because of an unsolicited letter, rather than because the Secretary of State had made a positive choice to raise specific questions and invite submissions.

Part of the Applicant's response to SPR's letter will be a wake assessment carried out since the end of the Examination and prompted by the Secretary of State's letter to Mona Offshore Wind Farm of 12th May 2025 and the subsequent decision letter on that application. The assessment provides detailed support for certain over-arching points made by the Applicant in relation to the impact of the East Anglia Two (EA2) project on Five Estuaries and the operational Galloper and Greater Gabbard projects.

The Applicant is mindful that the deadline for the decision on the Application is 17 September 2025. To assist consideration of this technical document, the Applicant is submitting in advance to the Secretary of State, under separate cover, the wake assessment just referred to. This assessment broadly aligns with the EA2 submissions in terms of the impact of Five Estuaries on EA2, but goes on to consider the reciprocal impacts on Five Estuaries. The assessment concludes that there is essentially no net impact when considering wake effects on both projects. These conclusions support the position of Five Estuaries on reciprocal wake effects which was set out during Examination. The assessment also models the impact of EA2 on the operational Greater Gabbard and Galloper offshore wind farms.

The Applicant has recently sent this wake assessment to SPR with a view to agreeing as much as may be possible in time for the deadline of 13 September 2025.

The Applicant's overarching position remains that the facts of the Five Estuaries application are very different to the other wake effects cases, including Awel y Môr, Mona, and Morgan, and that there is no policy justification for imposing any kind of wake effects requirement.

Yours faithfully,

A black rectangular box redacting the signature of the Project Lead.

Project Lead

Five Estuaries Offshore Wind Farm Limited