

Grahame Gould

Lead Member of the Examining
Authority

Five Estuaries Windfarm DCO

National Infrastructure Planning
[REDACTED]

Our Ref: 20048269

PINS Ref: EN010115

Date: 10 January 2025

Enquiries to: Mark Woodger

By E-Mail only

Dear Mr Gould

Planning Act 2008**Application by Five Estuaries Offshore Wind Farm Limited for an order granting development consent for the Five Estuaries Offshore Wind Farm project.**

I write with reference to the Rule 8 letter as dated 24 September 2024 which sets out the Examination Timetable for this Development Consent Order (DCO), this proposal being currently at Examination. Essex County Council (ECC), in conjunction with Tendring District Council (TDC), would like to respond to the Applicant's submissions received at Deadline 4. In doing so we refer to the "Joint Councils" here.

Comments are asked for by the 10 January 2025 and the ExA is asked to note that this submission meets this as requested date.

Within the suite of documents submitted at the previous deadline ECC wishes to make comment where comment is considered necessary on the following.

Firstly, the Council's note that a number of Questions as asked by the ExA at Q02 are answered by the Applicants in their submission at REP4-039 and where relevant the Council's make the following observations on the same below:

Ref	Question	Response
GC.2.02	Need for the EACN substation If both the Five Estuaries and North Falls projects were to be consented by the Secretary of State but for whatever reason neither were subsequently to proceed to implementation, would	In their response the Applicant has indicated they are not directed at them, but at NGET. However, the ExA are asked to note that both Five Estuaries, as is considered here, and North Falls, which is to enter Preliminary Hearing shortly, are wholly dependent on the EACN for a

	<p>there be a need for the proposed EACN substation?</p>	<p>connection to the wider Grid, without it neither will be able to be implemented as no alternative connect point is proposed. Here it is also correct to point out, and indeed as is public knowledge, that the EACN will also provide a connection point to another DCO proposal which is being developed to accept power from the Tarchon Interconnector Project. This development will, and here we quote from their web page:</p> <p><i>“create a direct power link between Germany and Great Britain, connecting the two countries’ energy markets and increasing the security and reliability of their electrical systems in addition to facilitating the integration of intermittent renewable energy sources like wind and solar”.</i></p> <p>The Joint Councils at initial meetings with Tarchon and their consultants, understand that the proposal involves laying a seabed cable between Germany and the UK, making landfall at a currently undefined place on the Tendring peninsula before making an underground cable connection to the EACN node.</p> <p>Hence the EACN provides a potential link not only to Five Estuaries and North Falls, but to Tarchon also. Therefore, other developments as well as the one considered here rely wholly on the EACN for connection to the wider grid.</p> <p>We recognise that this proposal is not before PINS at this time as a live DCO, but we anticipate it will be prior to the formal decision on this DCO.</p>
CC.2.03	<p>Waste Management Essex County Council and Tendring District Council in section 10.9 (Shoreline Management Plan) of their Local Impact Report (LIR) [REP2-043] make reference to the Hydrology, Hydrogeology and Flood Risk section of the ES [APP-088] in relation to the Essex and South Suffolk Shoreline Management Plan (SMP) and matters relating to the “Hold the Line” policy for the period up to 2055. The</p>	<p>The Council’s look forward to engaging with the applicants on this to ensure that any material as may be extracted and which is surplus to requirements as to the restoration of the site is used positively and beneficially in the local area in the interest of the waste hierarchy which seeks to re-use waste wherever possible.</p>

	Councils consider that there is an opportunity to utilise the 'material generated by horizontal drilling or other trenched excavations' 'for coastal protection or habitat creation in Essex'. Has any engagement with stakeholders been undertaken in respect of utilising waste soils/sub-soils for the management of coastal change?	
EO.2.01	<p>TPO Trees and Veteran Trees Table D Tree Preservation Orders (TPOs) in Arboricultural Report [APP-255] provides only a reference number, with a broad description identifying only the number of trees present. Appendix B (Tree Constraints Plans), Drawing Number 2 Sheets 28 of 47 and 37 of 47 illustrate the presence of TPO trees with a non-specific Tree Preservation Order Location (yellow star) or Tree Preservation Order Tending District Council 2023 (cross-hatched yellow).</p> <ul style="list-style-type: none"> • For TDC - in respect of Sheets 28 and 37 only, provide drawings at a scale 1:500 identifying any specific trees, by identification number/mark, which are likely to be impacted or subject to mitigation. • For TDC – in respect of Sheets 28 and 37 only, are any of the trees identified as Veteran? • For Applicant - where impacts are likely to occur on the TPO trees referenced above, whether in the form of pruning, lopping, root reduction or felling, provide reasons/justification for these actions and details of mitigation proposals to minimise the level of impact likely to occur. 	The Joint Councils responded with the information as requested at D.04 ref REP4-046. It is also correct that the root protection areas of trees as shown in the Constraints Plan need protection.
SEE.2.01	<p>Vibration impacts from HGV construction traffic.</p> <p>Vibration impacts from HGV construction traffic have been scoped</p>	The Joint Councils in their D04 response at REP4-046 considers that the best solution is to seek to reduce average speeds along Bentley Road to 40mph or lower for the life of the construction period, from the

	<p>out of the assessment undertaken by the Applicant in [Table 9.11, page 36 in APP-091]. Given Applicant's intention to use Bentley Road as a route for Abnormal Indivisible Loads of up to 400 tonnes, do you consider the scoping out of vibration impacts from HGV construction traffic is appropriate for Bentley Road? If you do not agree with the scoping out of that effect from the Applicant's assessment, explain why that is the case and advise on what you consider the Applicant should do to address this matter</p>	<p>current unrestricted 60mph limit, to reduce noise and vibration to properties adjoining the carriageway.</p>
SEE.2.02	<p>Mitigating construction noise via the submitted Code of Construction Practice (CoCP)</p> <p>Do you consider adequate measures for mitigating construction noise to an acceptable level would be available within the proposed CoCP [REP1-041] and could be secured through the provisions of the draft Development Consent Order [REP1-008]?</p> <p>If you consider the noise mitigation measures included in the CoCP would be inadequate, what additional measures do you consider should be included in the CoCP or secured by other means in any made DCO for the Proposed Development?</p>	<p>ECC consider that such controls would be adequate, the Applicants make reference in the CoCP at REP1-044 that such would be consistent with BS 5228 - Part 1: Noise and Part 2: Vibration which is the appropriate test.</p> <p>We also note that the CoCP is one of the control documents as may be attached to any Consented scheme.</p>
SEE.2.03	<p>Cumulative construction noise effects in Bentley Road</p> <p>In paragraph 9.12.26 of the Airborne Noise and Vibration assessment [APP-091] the Applicant has acknowledged that the cumulative construction traffic noise in Bentley Road may not be adequately mitigated by the implementation of the proposed 40mph speed limit and that further mitigation in the form of: a speed limit below 40mph, the re-routing of HGV construction traffic; and undertaking</p>	<p>See response to SEE.2.01 above. Whilst reducing speed limits would have some benefit this is unlikely to lead to a significant reduction on speed in isolation eg, other design considerations, such as traffic calming measures which are neither proposed nor considered appropriate here in this largely rural area. ECC as the Local Highway Authority, would encourage users accessing the site are recorded and manage speeds along Bentley Road, as part of the CoCP.</p> <p>Reducing traffic speeds to below 40mph would have a benefit on noise and</p>

	<p>sound insulation works for the affected dwellings.</p> <p>How practical and/or effective do you consider the implementation of additional mitigation measures such as lowering the speed limit below 40mph, the re-routing of HGV construction traffic; and undertaking sound insulation works would be?</p>	<p>vibration but would need to be ensured that this is enforceable.</p>
SEE.2.04	<p>Assessment of cumulative operational noise for the Proposed Development onshore substation and the substations proposed for North Falls and the East Anglia Connection Node</p> <p>With respect to the assessment of cumulative operational noise from all three proposed substations, are you content that the Applicant has used suitable data and undertaken an appropriate assessment to reach the conclusion in paragraph 9.12.33 of [APP-091] that there would be a “minor effect” that would not be significant for noise sensitive receptors?</p>	<p>It is difficult to assess the cumulative noise impact of the schemes in combination as ECC further complicated by the fact that Five Estuaries propose, under the “Rochdale Envelope”, two different options for this substation, added to the fact that North Falls propose the same, and the proposals for the larger EACN are not developed at this time. Hence it is necessary for the Applicant to express a qualified professional assessment of likely impact.</p> <p>The Joint Councils don’t raise any issue with the conclusion that effects would be minor given the information it has, but would wish to see a commitment from the Applicant to monitor both construction activities and the noise as generated by the substation which is lacking from the latest iteration of the Code of Construction practice at REP1-043 (clean)</p>
SLV.2.03	<p>Screen planting for the proposed onshore substation Further to the discussion relating to the screen planting proposals for the proposed onshore substation at Issue Specific Hearing 3, submit indicative cross sections for the screen planting for the proposed substation.</p>	<p>The Joint Councils note the applicant’s submission at D04 with the reference REP4-038 which shows planting progression over time. However, this is not set against any of the as proposed substation elevations, which will be significant in scale and form for whichever option is implemented, hence the impact and suitability of the same is difficult to assess.</p>
TT.2.03	<p>Assessment of cumulative effects</p> <p>At paragraph 8.12.16 of the Traffic and Transport chapter (Revision B) of the Environmental Statement [REP1-018] in relation to the National Grid</p>	<p>The Joint Councils remain in discussion with the Applicants of each DCO proposal</p>

	<p>Norwich to Tilbury Reinforcement Project you state: "To inform the cumulative Traffic and Transport assessment, National Grid has provided some indicative HGV and construction workforce vehicle movements..." Can you confirm that the vehicle movement information you were provided is consistent with that set out in the Norwich to Tilbury Preliminary Environmental Information Report (Appendices 16.1 to 16.3) published by National Grid for consultation between 10 April and 18 June 2024?</p>	
TT.2.04	<p>Use of Little Bromley Road and Ardleigh Road by construction traffic</p> <p>In the updated Chapter 8 of the ES (Traffic and Transport) [REP1-018] reference is made to Little Bromley Road and Ardleigh Road being used by construction traffic. During the course of ISH3 you explained that the use of those roads would be required so that the Proposed Development's construction traffic could avoid passing through the construction site for the proposed East Anglia Connection Node's substation. In order to make use of Little Bromley Road and Ardleigh Road it appears construction traffic would also need to make use of other roads (links) in order to get to or from any of the A class roads in the area. Chapter 8 of the ES does not provide details of the intended entire route between any of the A roads in the area and Little Bromley Road and Ardleigh Road, accordingly the Applicant should:</p> <ul style="list-style-type: none"> a) submit a plan showing the entirety of the proposed construction traffic route that would utilise Little Bromley Road and Ardleigh Road; b) provide daily construction traffic movement projections for the entirety of this proposed construction traffic route; and c) explain whether it would or would not be possible for the construction sites within the proposed substation 	<p>Discussions on this are on-going and any substantive response to this will be submitted at D.06 on the 11/02/2025.</p>

	zone to be designed so as to avoid the need for the Proposed Development's construction traffic to route through the site for the proposed East Anglia Connection Node.	
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The ExA is asked to note that the Joint Councils have responded to questions GC.2.04, DCO.2.04, DCO.2.05, SLV.2.02, WE.2.01 and WE.2.07 at Deadline 04 which has the ExA reference REP4-046.

ECC Green Infrastructure (GI) position

ECC GI Team with the opportunity to assess the changes to the Five Estuaries Draft DCO (REP4-004 Clean). We welcome the suggested edits and amendments as outlined in the Schedule of Changes to the draft DCO (revision E Deadline 4), including:

- Changes to the heading for requirement 5 on pages 12 and 48 for clarity and inclusion of the works, design, and landscape to the Onshore Substation.
- The addition to sub-paragraph 8 on page 48, stating that the landscaping of Work No. 15 must be maintained throughout the operation of Work No. 15B.
- The strengthened wording for Biodiversity Net Gain 20 (page 52), ensuring no stage of the onshore works (Work No. 15) may commence until a net gain strategy is approved by the relevant planning authority.
- Welcome the inclusion and reference to the Essex GI Strategy and Standards in the Outline LEMP and that the Nine GI standards will inform the development of mitigation proposals post-consent, which will inform the Final LEMP.

ECC Suds

ECC Suds team have raised the following points with regard to the Onshore Substation:

- In addition to the information provided we would like to see the modelling for the drainage system for all events up to the 1in100 plus climate change.
- Confirmation of the discharge rate is required.
- How will the permanent access road drain, will it be unrestricted? Is the swale sufficient treatment for the road?
- In accordance with the Land Drainage Act 1991, Section 23 consent will be required for the headwalls and culverts.
- When will infiltration testing be undertaken? It is preferable to undertake tests in winter months when worst case scenario can be established.

ECC Landscape

ECC Landscape Team have raised the following points with regard to the OLEMP Version C REP2-023

- Subsequent to our comments in our December 3rd ECC Responses to the ExA's ExQ2, ref ECC.20, we note that OLEMP Version C (Rep2_023) summarises an approach to GI/landscape strategy, vision and principles in Para 1.2.6 Landscape, Para 2.6 ONSS Landscape Mitigation, and to GI in Para 2.4, which we generally welcome.

- However, we would request that width parameters of a minimum 20m be set down in the OLEMP, for belts of screen planting, as has been discussed between the applicant and ourselves in Landscape and Ecology consultation workshops, to ensure that the ambition and intention of the proposals is carried through and delivered at the consent stage.
- In addition, we judge the growth rates of proposed screen planting identified in the OLEMP to be optimistic, especially at a time of unpredictable and extreme weather events. We do not accept that it is yet demonstrated that the mitigation planting proposals will eliminate significant effects, in a 5-15 years' time period, as identified in the OLEMP. To demonstrate that the screening, as proposed, could be effective in mitigating both landscape and visual impacts, we would recommend cross-sections be produced, through the proposed development, including through the screen planting at different stages in its growth, as previously requested in Landscape and Ecology consultation meetings.
- We remain sceptical about the appropriateness of creating an orchard on the northern side of the substation for the reasons set out in our ECC Responses to the ExA's ExQ2, ref: GC.2.04. We dispute that the orchard planting would provide 'effective screening' to the substation as shown in Figure 2 of the OLEMP, if these trees need to be maintained at 5m in height. We would suggest the primary role of this feature is for biodiversity and cultural enhancement, and not screen planting, and should be identified as such.
- At Para 2.6.24 of the OLEMP, and in ECC's Responses to the ExA's ExQ2 ref ECC.26, a standard 5 year maintenance period is mentioned, which we are taking as the establishment period, but our understanding from previous meetings with the applicant is that all planting around the substation will effectively be managed for the lifetime of the installation. Landscaping along the cable corridor is sought for a 10 year period. At 10.2.3 it is clarified that all habitats created as part of ecological compensation or enhancement will be managed for 30 years. Can the applicant clarify if all the landscape screening, mitigation and enhancement measures are effectively covered by this Paragraph, and if this is the case that this is identified within the OLEMP.
- Para 2.6.7 and Para 3.2.4 makes mention of the decommissioning of the installation and that details would be provided in a LEMP at the time of decommissioning. However we would recommend that further commentary on the approach or principles governing decommissioning in relation to landscape assets should be provided in the OLEMP so that all parties have a common understanding of the preferred outcomes for landscape and how to obtain them. If this is already identified for biodiversity mitigation and enhancement measures, can this be cross-referenced with the landscape section and/or vice versa.
- In relation to Responses to the ExA's ExQ2, ECC.51, planting along public rights of way to screen infrastructure, in general we support the applicant's approach in landscape and visual terms, that this should take place, although this may in itself have a negative effect on more open views. However, we agree with the caveat from the PRoW team that enough space should be left i.e. 3m in order that the proposed hedgerows do not encroach on the PRoW.

Highways and Transportation

Essex County Council as the Local Highways Authority raise the following comments.

10.30 Applicant's Comments on Deadline 3 Submissions [REP4-040]

The Council makes the following comments on those responses relating to transport matters from Essex County Council's Deadline 2 submission.

Ref		Applicant's Response	ECC Comments
ECC02	<p>b) Assessment of cumulative impacts during construction of Five Estuaries at the junction of the A120 and Bentley Road</p> <p>The Council have concerns over communities experiencing repeated impacts as a result of numerous projects. This was covered by the examining authority and previously set out in our response to item (d) [REP1-062].</p>	<p>The Applicant has updated 6.3.8 Traffic and Transport – Revision C [AS-043] with a high level assessment of VE build-out Scenario 3 where there would be a greater than three years between the construction of VE and NF OWF. The extract of the Traffic and Transport chapter is included in Appendix 3 of 10.25 Applicant's Responses to Action Points - ISH3, CAH2, ISH4 [REP1-061].</p>	<p>ECC responded to Appendix 3 of 10.25 [REP3-025] at Deadline 4 [REP4-046]. To not produce additional submissions unnecessarily, we will await any response at Deadline 5.</p>
ECC03	<p>c) Mitigation works proposed at the junction of the A120 and Bentley Road</p> <p>Subject to National Highways being content, in principle we do not have any concerns with the design at this stage, however, the Council have not yet identified a Stage 1 Road Safety Audit for the widening works and footway/cycleway prior to the end of the DCO. Although not considered likely, it may identify requirements for the design, which may result in the need for additional land that may not have been identified.</p>	<p>The Applicant undertook the Stage 1 RSA on 14 November 2024. This was accompanied by National Highways. The audit report has now been issued and will be provided to Essex County Council and submitted into the Examination at a future deadline. The highway improvement designer (Mott MacDonald) will review the audit report and provide a Designer's Response Report. This will include responses to each of the two issues identified in the audit</p>	<p>Noted. We await receipt of the audit. Please can the Council be notified of its submission.</p>

		<p>report, together with any changes to design</p> <p>(where the recommended changes are agreed). The Designers Response Report and updated design drawing (as appropriate) will also be issued to Essex County Council once agreed with National Highways.</p>	
ECC09	<p>Inclusion of Paragraphs 8.7.10 and 8.7.18. Table 8.19. With regards to the speed limit change on the B1035 Thorpe Road (sheet no.3 of 7 on [AS-030], the Council are of the opinion that a 40mph speed limit is preferable over a 30mph speed limit at this location due to the local context, and that the speed limit should be extended to the south to include AC-4 (location shown on sheet no. 9 of 20 on [AS-023]. This would need to be reflected in an updated design of the access junction to include sufficient visibility for a 40mph speed limit.</p>	<p>The Applicant is seeking to liaise further on this request with Essex County Council. If updates to documents or plans are required these will be submitted at a future deadline.</p> <p>The Applicant notes that the 30-mph speed limit along Thorpe Road was agreed at a meeting with Essex County Council Highways on 11th August 2023, subject to a Road Safety Audit being undertaken. This was done and confirmed no issues. The 30mph speed was proposed to reduce the need to cut back hedgerows around AC-5, which link with ancient semi-natural woodland, and have potential bat trees, dormice presence, lapwing and reptiles. The Applicant would seek to retain the proposed 30 mph</p>	<p>Following a meeting on 18th December 2024, it is understood that the speed reduction plans are to be updated to reflect an agreed 40mph speed limit for AC-4 and AC-5.</p> <p>Based on the speeds recorded (39mph) a temporary 40-mph speed limit should be self-enforcing and would see greater compliance compared to a temporary 30-mph speed limit.</p>

		speed limit on this section of road. No temporary speed limit change is considered necessary in the vicinity of AC-4, given the 85th percentile speeds recorded (39mph) and the 120m visibility splays shown.	
ECC09A	In addition to the comments above, it is considered that the speed limit change on Golden Lane (sheet no. 2 of 7 [AS-030]) be extended approximately a further 60m to the east to cover all the residential properties.	The Applicant is seeking to liaise further on this request with Essex County Council to understand the benefit of the extension. If updates to documents or plans are required these will be submitted at a future deadline.	Following a meeting on 18 th December 2024, it is understood that the speed reduction plans are to be updated to reflect an agreed extension to the speed limit plan to 60m to the northeast to cover the residential property. It is also considered likely to improve the position of the terminal signs which would be less likely to be obscured by overhanging vegetation.
ECC10	Table 8.8 Inclusion of AC-13 Ardleigh Road: In principle, the Council do not have specific issues with the access; however, we would want to see a drawing with visibility splays, swept path assessment and it is required to be subject to a Stage 1 Road Safety Audit, as per the other site accesses.	<p>The Applicant is seeking to liaise further on this request with Essex County Council. If further work, or updates to documents or plans are required these will be submitted at a future deadline.</p> <p>The proposal at AC-13 is to make use of the existing field access (which is currently used by large agriculture vehicles), for a very limited number of construction vehicles. It is not proposed to</p>	Following discussions with the Applicant and the potential extent of the use of the access, the Council are investigating whether any further information is required.

		<p>significantly upgrade the access. In terms of visibility splays, given the limited vehicle movements in and out of AC-13 forecast and given the Outline</p> <p>Construction Traffic Management Plan (CTMP) [AS-055] has been updated to state that banksmen would be used to manage construction vehicle movements on Ardleigh Road, a drawing showing visibility splays is not considered necessary by the Applicant.</p> <p>The Applicant considers the above elements can be controlled through the CTMP post consent and do not need to be detailed at this stage.</p> <p>As no physical changes to the access are proposed and the use of the AC-13 would</p> <p>most likely be for less than six months, based on paragraph 2.1 (and NOTE) in the</p> <p>Design manual for Roads and Bridges (DMRB) GG 119., no Stage 1 Road Safety Audit (RSA) should be required. Should it be deemed necessary, post consent, to use AC-13 for greater than six months, the</p>	
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		Applicant would discuss the requirement for a Stage 1 RSA with Essex County Council.	
ECC11	<p>Technical Note – Abnormal Indivisible Loads [REP2-029]</p> <p>Due to the weights of the vehicles involved, it is recommended that there are early discussions with the ECC structures team for the affected routes. There may be structures that are being monitored by the Structures team, which may not have reached the threshold to have a formal weight limit implemented on a particular structure, affecting potential designated routes.</p> <p>With regards to the AIL figures at Table 1, it is queried whether when departing from the site the Cable Drums the vehicle would remain an AIL based on its length or whether the length of the vehicle can be reduced? As per our response to [REP2-026], can the total movements figure be confirmed due to the potential inconsistency between the figures being quoted.</p> <p>Although from discussions we understand the figures in [REP2-029] are correct. The Council welcomes the commitment to undertake Road Condition Surveys, as per [REP1-043]. The Council are having internal discussions around the requirements for the level of survey works due to the road</p>	<p>The Applicant notes the comment regarding making contact with the Essex County Council Structures team when finalising the detail of Abnormal Indivisible Loads deliveries on the local highway network.</p> <p>As each cable drum would need to be taken off-site once the cable has been installed, the vehicle would remain the same size when departing the site. If the trailer of the articulated vehicle is less than 18.65 m in length and the AIL is based on weight only, the vehicle departing the site would not be an AIL. This would be considered in line with the approach for AILs set out in the 9.24 Outline Construction Traffic Management Plan (oCTMP) [AS-055].</p> <p>The Applicant has updated the 9.24 OCTMP [AS-055] in response to comments and</p>	<p>Noted.</p> <p>Due to the volume and size of the AILs a road condition survey is essential, any list provided of the roads included within the survey should be shared with:</p> <ul style="list-style-type: none"> • Asset Management team • Structures team • Road Safety team <p>To check for any pre-existing issues (maintenance, weak structures and Accident Reduction sites) for those routes.</p> <p>Accident Reduction sites are monitored by the ECC Road Safety Team.</p> <p>The list of roads to be surveyed can be agreed through the CTMP.</p>

	<p>status. The Council would request that the list of roads to be surveyed is agreed within the OCTMP, as the wording of some roads is ambiguous. The list could be indicative and subject to further refinement following appointment of a contractor.</p>	<p>has provided a draft to Essex County Council for discussion prior to submission at Deadline 5. This includes the suggested roads that could be subject to road condition surveys.</p>	
ECC12	<p>Annex 2: Wynns Report Under paragraph 9.1.4 of Annex 2, the structural status of the culvert</p> <p>shown at photograph 54 located immediately prior to the proposed site access point would need to be confirmed. The report indicates that a short-term solution would be that a</p> <p>temporary plate could be installed to enable AIL access, due to the size and weight of the AILs that may not be acceptable to the ECC Structures Team. It is recommended that</p> <p>discussions are held on this issue.</p> <p>Section 10 of Annex 2 indicates a potential need to route some AILs through Colchester; the routes include the A134 (photograph 87) and Station Approach near North Station, Colchester (photographs 81 and 82) where you have some overhead bridge structures, however, no swept path drawings have been provided for these areas within Colchester. The Applicant should be aware that there is a compact roundabout on the B1035 south of the Horsley</p>	<p>The Applicant notes the comment regarding making contact with the Essex County Council Structures team when finalising the detail of Abnormal Indivisible Loads deliveries on the local highway network.</p> <p>The Applicant notes that Annex 2 is a North Falls commissioned report, North Falls have advised the Applicant that swept path analysis is only provided in the report where Wynns as an abnormal load specialist, applying their professional judgement and experience as industry experts consider that it is needed to confirm the suitability of a route. In this instance swept path analysis has not been recommended by Wynns to be required.</p> <p>It is not envisaged there would be any</p>	<p>On the first point, this would be a decision for the Structures team to determine whether this approach would be acceptable.</p> <p>The comment does not seem to clarify the proposal featured in Section 10 of Annex 2 routing some AILs through Colchester which would cause severe delays during the day. The only time that this may be an option if it was restricted to off-peak and at night.</p> <p>It is considered sensible at this stage to undertake a swept path analysis for the new roundabout on the B1035, south of the A120 Horsley Cross.</p>

	<p>Cross roundabout that forms part of planning application:19/01706/OUT - Land southwest of Horsley Cross Roundabout Clacton Road Horsley Cross CO11 2NZ for the warehouse and distribution centre at Centurion Park, Horsley Cross, which is under construction now.</p> <p>Consideration should be given towards undertaking a review of this junction for AIL movements.</p>	<p>issues at the new roundabout on the B1035 south of the A120, given the alignment of the B1035 entry and exit arms and the 6m wide over run area. Therefore, the Applicant does not consider it necessary to undertake a swept path analysis of a cable drum delivery vehicle manoeuvring at the roundabout.</p>	
ECC13	<p>Appendix 5: Swept Path Assessment</p> <p>The majority of the drawings indicate no anticipated issues, there are a few of the drawings that indicate that the AIL will have to cross the opposing lane to make the turning or potential partially encroach the opposing lane. However, it is understood that in this situation an 'escort/pilot vehicle may be used, which would be discussed and agreed with the relevant highway authorities'. This is considered to be acceptable.</p> <p>There does remain some concern around the capability for the vehicles to undertake these movements within the highway network without overrunning of the kerb and potential damage (particularly B1033 / B1035 junction at Thorpe Green, and</p>	<p>Should it be identified that the vehicle used in the swept path analyses (which is the largest possible vehicle type to deliver two cable drums), cannot make the manoeuvre following further investigations or a trial run, a smaller vehicle would be used with one cable drum.</p> <p>Potential delays to other road users would only when the vehicle is turning at a sharp bend or moving slowly with an escort/pilot vehicle, and therefore infrequent, and for a short period of time, which would not be considered a significant effect.</p>	<p>With regards to the delay, it is assumed that the point being made is that the manoeuvrability of the vehicle is not impacted by the weight of the cable drum, and as per para 2.2.4 and 3.1.4 of the Abnormal Indivisible Loads Technical Note [REP2-029] that they would move along roads with a similar manoeuvrability and tracking to a typical articulated HGV? Would they travel at similar speeds? If so, it is agreed that the impacts in isolation would not be significant and there is no further comment.</p> <p>The comment does not seem to clarify the proposal featured in Section 10 of Annex 2 routing AILs through Colchester which would cause severe delays during the day. The only time that</p>

	<p>generally at the site accesses). As a result, the ability to rectify damage to the highway quickly through the project as a result of</p> <p>damage caused by large vehicles is considered to be important. It is worth considering whether there is an opportunity for a trial run on the highway network (without the cable drum) to understand the impact.</p> <p>IT is worth noting that, the large number of AILs providing access to the cable corridor would result in increased delay to users of the local road network that should be considered alongside all other impacts.</p>		<p>this may be an option if it was restricted off-peak and at night. Plus, it is understood that the route forms a red route for Emergency vehicles.</p>
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10.20.6 Technical Note – Haul Road between Bentley Road and the Onshore Substation [REP4-036]

Ref	Applicant's Response	ECC Comments
Para 4.1.3	<p><i>If the projects are not built out at the same time but were sequential, then the maximum number of HGVs/day will decrease, however the duration of the impact would increase. This is not considered the worst case because the percentage increases of construction traffic above baseline traffic flows on the local and strategic highway networks included in the traffic and transport study area would be lower.</i></p>	<p>Whilst it is agreed that the maximum impact would reduce and that this reflects the assessment methodology set out within the Guidance on Environmental Assessment of Traffic and Movement; it is considered reasonable that a more extensive impact, that is lower in terms of total vehicles but longer with regards to time, might be considered to be a greater impact on users of a transport network than more shortened but increased effects. Albeit an oversimplification, 50 HGVs travelling past you whilst walking to work for one month might be far more tolerable than 30 HGVs for three months. These repeated continuous impacts of numerous large projects over an extended time period are an important consideration. However, as above, it is recognised that the <i>worst case</i> assessment has been undertaken based on</p>

		the relevant guidance. This issue can be considered to be closed out on this basis.
4.3.6	<i>if the build out follows Scenario 3, it is possible that the Temporary Substation Haul Road is installed, used and then removed by the first wind farm project, and then due to a large time gap this happens a second time for the second project.</i>	As above, this would result in repeated impacts on users of the network particularly around HGV movements and potentially delays associated with traffic management.

This represents our formal submission at Deadline 05. ECC and TDC look forward to remaining engaged in this DCO process and will continue to work with the Applicants and the ExA meeting the deadlines as set out in the issued Rule 8 letter.

Yours sincerely,

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