



N O R T H F A L L S

Offshore Wind Farm

Applicant's Response to Local Impact Reports (LIRs)

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1. INTRODUCTION

1.1 Introduction and Background

- 1.1.1 This document has been prepared by North Falls Offshore Wind Farm Limited ('the Applicant') in relation to the North Falls Offshore Wind Farm (hereinafter referred to as 'North Falls' or the 'Project').
- 1.1.2 At Deadline 1 (18 February 2025) of the Examination for the Project, Local Authorities, as defined in Section 56A of the Planning Act 2008 (PA2008) were invited to submit a Local Impact Report (LIR).
- 1.1.3 An LIR is a written report, authored by the Local Authorities, detailing the likely impacts of the Project on the respective authorities' areas (or any part of that area) as defined in Section 60(3) of the PA2008.

1.2 Local Impact Reports submitted at Deadline 1

- 1.2.1 A total of four LIRs were received from the following Local Authorities:
 - Essex County Council and Tendring District Council (joint LIR) [\[REP1-065\]](#)
 - Babergh District Council [\[REP1-063\]](#)
 - East Suffolk Council [\[REP1-064\]](#)
 - Suffolk County Council [\[REP1-074\]](#)

1.3 Purpose of this document

- 1.3.1 The Applicant has reviewed each of these LIRs and this document provides the Applicant's responses to them. This document been submitted to the Examination at Deadline 2 on 04 March 2025.
- 1.3.2 Tables 2.1 – 2.4 below present the Applicant's responses to the LIRs that were submitted at Deadline 1. The document has not copied all of the text from the LIRs but identifies key paragraphs to respond to. This is to aid readability and avoid an overly long document that repeats information already submitted into the Examination. References to specific paragraphs from the LIRs (where paragraph numbers are present) have been made clear in the following format **[Paragraph X.X]**.

2. APPLICANT'S RESPONSE TO LOCAL IMPACT REPORTS

2.1 Applicant's response to Essex County Council and Tendring District Council's Local Impact Report [REP1-065]

Table 2.1 – Applicant's response to Essex County Council and Tendring District Council Local Impact Report

Applicants Ref	Theme	Key Paragraphs of LIR	Applicant's Response
LIR_ECC_3.1	National Policy	<i>The Councils are of the view that the National Policies as set out are comprehensive and represent common ground between the parties. As such the same agreement will be embedded in the SoCG between the applicant and the Councils.</i> [Paragraph 3.1.4]	Noted and agreed, the Applicant will include this in the forthcoming Statement of Common Ground (SoCG).
LIR_ECC_3.2	Statutory Development Plan	<i>A) Tendring District Local Plan (2013-2033)</i> [Paragraph 3.2.1.1 – 3.2.1.21]	The Tendring District Local Plan (2013-2033) policies listed in Paragraphs 3.2.1.1 – 3.2.1.21 are noted.
LIR_ECC_3.3	B) Adopted Neighbourhood Plan	<i>B) Adopted Neighbourhood Plan</i> <i>The Planning Statement at APP-233 seems to refer to the Ardleigh Neighbourhood Plan (ADP) as a 'draft' neighbourhood plan, which is incorrect, the ADP has now been adopted, all relevant Ardleigh Neighbourhood Plan policies should be included and properly considered in each of the relevant statements.</i> [Paragraph 3.2.1.22]	<p>As outlined in Paragraphs 6.4.8 – 6.4.10 of the Planning Statement [APP-233] at the time of submission of the DCO Application in July 2024 the Ardleigh Neighbourhood Plan was in draft and not yet adopted.</p> <p>The Applicant understands that Tendring District Council decided by resolution at Cabinet on 21 October 2024 to make the Ardleigh Neighbourhood Plan (2024) under Section 38A(4) of the Planning and Compulsory Purchase Act 2004 (as amended). The Ardleigh Neighbourhood Plan now forms part of the Development Plan for Tendring.</p> <p>It is noted that the Ardleigh Neighbourhood Plan Area includes some of the onshore project area, part of the onshore substation zone. The land for Work No. 14 for the East Anglia Connection Node (EACN) substation being brought forward for the Norwich to Tilbury Project by National Grid would be within the neighbourhood plan area.</p> <p>The western extent of the onshore project area is circa 2.5km east and outside of the Settlement Development Boundary of Ardleigh as shown in Map 1 (Page 100) of the Ardleigh Neighbourhood Plan (2024).</p> <p>Table 7.6 of the Design and Access Statement [APP-235] provides an assessment against the relevant Ardleigh Neighbourhood Plan policy EP - Natural, Built & Historic Environment that is relevant to design and heritage.</p> <p>The following policies appear focused on land within or adjacent to the Settlement Development Boundary of Ardleigh, and their applicability in this case, given the distance between the Project and the settlement boundary of circa 2.5km, appears limited. They are:</p> <ul style="list-style-type: none"> - Policy CFP - Community Facilities - Policy LGP - Local Green Spaces <p>All of the relevant policies within the now adopted Ardleigh Neighbourhood Plan will be considered in an update to the Planning Statement [APP-233] be submitted at Deadline 3.</p>

Applicants Ref	Theme	Key Paragraphs of LIR	Applicant's Response
LIR_ECC_3.4	C) TDC Local Plan Review	<p><i>The Local Plan review was originally proposed in Q2 2024, this was put on hold after the Government launched a consultation on proposed changes to the National Planning Policy Framework (NPPF) and the introduction of mandatory housebuilding targets for Councils, as part of its ambition to build 1.5million new homes across the country over the next five years.</i></p> <p><i>A report to TDC's Planning Policy and Local Plan Committee on Monday, 10 February 2025, said that as a result of the change, Tendring's housebuilding target will increase from 550 homes per year to 1,034 homes per year starting January 2026. The new target requires TDC to plan for an additional 7,000-8,000 new homes by 2041 over and above the 9,600 already in the pipeline as part of current plans.</i></p> <p><i>The updated Local Plan will need to cover a period of 15 years from its anticipated date of adoption and will extend to the year 2041. Many building developments have already been approved and will continue to deliver many of the homes and infrastructure required for Tendring under the existing Local Plan but to meet the future needs of residents and growth for the area, more needs to be done. It is expected that Tendring Colchester Borders Garden Community and the Hartley Gardens development in Clacton will contribute significantly to meeting any longer-term requirements.</i></p> <p><i>Before the recent change in Government policy, TDC had been expecting to consult residents on six different options for accommodating 3,000-4,000 extra homes in Tendring, but a doubling of that requirement to 7,000-8,000 has required TDC to go back to the drawing board.</i></p> <p><i>Four new alternatives have now instead been identified for public consultation.</i></p> <p><i>All the options include proposals for major growth in the Harwich area, the potential establishment of two or more new garden villages on key transport corridors, with different scales of development across the district's other towns and villages.</i></p> <p><i>Option A – A120 and Railway Focus. In addition to significant growth at Harwich, and smaller scale development around villages across the district, this option proposes the establishment of two new garden villages of between 1,500 and 5,000 homes – one in the Frating/Great Bromley/Hare Green area and one at Horsley Cross, as part of an A120-focussed growth strategy delivering road connectivity improvements. It also includes more growth around the district's larger villages with railway stations.</i></p> <p><i>b) Option B – Central Triangle of Garden Villages. As well as garden villages at Frating/Great Bromley/Hare Green and Horsley Cross, this option includes a third garden village at Weeley, delivering around 1,000 new homes through strategic expansion with good access to the rail and road networks.</i></p> <p><i>c) Option C – A133/B1033 Garden Villages. This option proposes three new garden villages – one at Frating/Great Bromley/Hare Green, one at Weeley, and one at Thorpe-le-Soken, as part of an A133/B1033 focussed strategy, delivering improvements to the capacity of the A133 and a possible bypass around Thorpe. Other large villages with railway stations would experience a level of growth proportionate to their existing size.</i></p>	<p>The Applicant notes Tendring District Council's comments in relation to housing targets and the delay to the Local Plan review following the Government's changes to the NPPF.</p> <p>The Applicant has reviewed Appendix 22 of the LIR which includes a spatial representation of the four options described in the LIR. At this stage the visualisations appear high-level and do not spatially define areas for growth in a specific manner. Given the early and indicative nature of these four options the Applicant awaits further information before providing a response on the comments related to compatibility between North Falls and areas planned for future housing as part of the Local Plan review.</p> <p>The Applicant understands that the 'Tendring District Local Plan Review: Issues and Options' report will be published online very shortly for public consultation. The full 'Tendring District Local Plan Review: Issues and Options' report does not appear attached or included as a submission at Deadline 1, as referenced in Paragraph 3.2.1.30.</p>

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		<p><i>d) Option D – Four Garden Villages. This option proposes four new garden villages – one at Horsley Cross, one at Frating/Great Bromley/Hare Green, one at Weeley, and one at Thorpe-le-Soken. This option combines the strategy from the previous options, promoting growth on the A120 corridor towards Harwich, and the A133/B1033 corridor towards Clacton, Frinton and Walton.</i></p> <p><i>To assist the ExA a map extract is included at Appendix 22 to show the spatial distribution of the sites. The full Tendring District Local Plan Review : Issues and Options consultation document is included as a separate document with this submission.</i></p> <p>[Paragraph 3.2.1.23 – 3.2.1.30]</p>	
LIR_ECC_3.5	C) TDC Local Plan Review	<p><i>The Councils note that such proposals have yet to undergo consultation, before recommendation and potential adoption, however they show the ExA the direction of travel by which development could come forward.</i></p> <p><i>The Councils are concerned about the close proximity of the proposed cabling corridor to the north and east of the existing built-up area and settlement development boundary of Thorpe-le-Soken.</i></p> <p><i>The encroachment of the cabling corridor into these planned growth areas could poses a significant risk to the viability of future housing developments. TDC is particularly concerned that the presence of this infrastructure so close to the settlement of Thorpe-le-Soken will hinder sustainable future expansion and have a detrimental impact on our strategic growth objectives.</i></p> <p><i>Similarly, large areas to the north and south of the A120, east of the Horsley Cross Roundabout, have been designated for future housing and employment growth. The proposed cabling corridor intersects these critical growth zones, which would significantly impact TDC's long-term development plans. The North Falls DCO, together with the Five Estuaries projects which is also at Examination, as currently proposed, will have considerable implications for the strategic objectives in these areas.</i></p> <p>[Paragraph 3.2.1.34 – 3.2.1.37]</p>	<p>The DCO Application was submitted in July 2024 and the Applicant consulted with Tendring District Council on the cable corridor during both non-statutory and statutory consultation as outlined in the Consultation Report [AS-015].</p> <p>The Applicant notes the Councils' comments on potential interactions between the Project and planned growth areas options contained within the '<i>Tendring District Local Plan Review: Issues and Options</i>' report. The statements in Paragraph 3.2.1.34 – 3.2.1.37 of the Essex County Council and Tendring District Council's LIR states that the Project, specifically the location of the proposed onshore cable corridor, may present a risk to the viability of future housing and employment developments in the planned growth areas – and that presence of the cable corridor would therefore affect Tendring District Council's long-term development plans (being brought forward as part of the emerging Local Plan).</p> <p>The Applicant awaits the publication of the '<i>Tendring District Local Plan Review: Issues and Options</i>' report before commenting in full on the Project's impact on the plan-making process and whether the Project would impact on potential future housing and employment growth areas.</p> <p>As a preliminary comment, it is noted that Paragraph 50 of the NPPF (2024) refers to the limited circumstances, although more applicable to development under the Town and Country Planning Act (1990) (as amended), where arguments that an application for planning permission is premature would justify a refusal of planning permission. The limited circumstances listed in Paragraph 50 are where both:</p> <p><i>'a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and</i></p> <p><i>b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.'</i></p> <p>Further, paragraph 51 of the NPPF (2024) states that:</p> <p><i>'Refusal of planning permission on grounds of prematurity will seldom be justified where a draft plan has yet to be submitted for examination; or – in the case of a neighbourhood plan – before the end of the local planning authority publicity period on the draft plan.</i></p>

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			<p><i>Where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how granting permission for the development concerned would prejudice the outcome of the plan-making process.'</i></p> <p>The local plan review is at a nascent stage and no emerging Local Plan has been published, so it is not considered to be at an advanced stage. The Applicant also notes that, to date, limited public consultation that has taken place.</p> <p>The Applicant is, at the time of writing, also unaware if the '<i>Tendring District Local Plan Review: Issues and Options</i>' has been subject to a Strategic Environmental Impact Assessment under The Environmental Assessment of Plans and Programmes Regulations (2004), or a plan level Habitats Regulations Assessment under The Conservation of Habitats and Species Regulations 2017. Both assessments will inform the extent to which future development areas are consistent with national policy.</p> <p>Accordingly, the Applicant's view is that the '<i>Tendring District Local Plan Review: Issues and Options</i>' report and the development options it proposes should be considered to be of limited weight at this stage. The Applicant therefore does not consider that the DCO application should be refused or amended on the basis of prematurity.</p> <p>The Applicant would also note that the offset required from the underground cables by any development that requires foundations or intrusive works will be less than that of the construction corridor. Roads, footpaths, cycleways, open space, and other uses needed to support housing and employment developments could also be accommodated above the buried cables and as such the cables would not necessarily hinder development.</p>
LIR_ECC_4.1	In Combination Effects	<p><i>"The comparative project at Five Estuaries in reaching the end of its Examination. Both these proposals would be wholly dependent on another NSIP proposal, Norwich to Tilbury (N2T), for onward connection to the Grid. This proposal is part of the "Great Grid Upgrade" and proposes a new mainly overland power transmission link from Norwich to Tilbury across the heart of the East Anglian Region, before onward connection to the further grid network."</i> [Paragraph 4.1.2]</p> <p><i>"During the preliminary hearing for NF the ExA explained that they will make a recommendation to the SoC once the DCO process has concluded and that the SoS will, amongst other things, consider the cumulative impacts of other projects. However, it is not currently known which other projects' cumulative impacts will or should be considered alongside the NF and FE projects. There is significant local concern about the cumulative impacts of this substation, the proposed FE substation, the East Anglian Connection Node and potential future NSIP projects (such as the Tarchon Project). Each of these projects will do irrevocable damage to this historic landscape, and some of the potential impacts of the same are not known, Tarchon currently represents a proposal which is still being developed and at this time something that the Councils have only basic knowledge of. The landscape and its setting are of great value and importance to those communities and residents who have lived in, farmed and enjoyed this natural vista. In addition to the requirement to secure considerable landscape mitigation in the form of screen planting, woodland/grassland/new hedgerows etc, it will also be necessary to secure details of new and compensatory soft landscaping to mitigate the harm caused by the removal of existing vegetation."</i></p>	<p>Essex County Council and Tendring District Council refer to North Falls being 'wholly reliant' on the Norwich to Tilbury project. This is not the case: please see response to Q3.1.6 in Applicant's Response to Written Questions (ExQ1) [9.19, (Rev 0)] submitted into the Examination at Deadline 2 the Applicant's response to this question of reliance.</p> <p>The Applicant notes that the comments made in paragraph 4.1.13 of Essex County Council and Tendring District Council 's LIR are directed towards to the Examining Authority (ExA) and SoS rather than the Applicant.</p> <p>With respect to the specific point raised regarding cumulative landscape effects, the Applicant offers the following response:</p> <p>Paragraph 121 of the ES Chapter 30 Landscape and Visual Impact Assessment (LVIA) [APP-044] confirms which projects have been considered in the cumulative assessment. This list was based on a screening exercise. Paragraph 119 of ES Chapter 30 states:</p> <p><i>"The project screening has been informed by the development of a [cumulative] project list which forms an exhaustive list of plans, projects, and activities within the study area relevant to North Falls. The list has been appraised, based on the confidence in being able to undertake an assessment from the information and data available, enabling individual plans, projects, and activities to be screened in or out."</i></p> <p>For projects which are very early in the development process, given the high level of uncertainty around project details, it is not possible to include these projects in the cumulative assessment. However, the planning application for any of these future projects should include their own cumulative assessments, which will include the North Falls project if relevant.</p>

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		[Paragraph 4.1.13]	
LIR_ECC_4.2	Climate Change	<p><i>"ECC has assessed the development as proposed against its Net Zero: Making Essex Carbon Neutral – Essex Climate Action Commission policy document. It has concluded that we are in favour of this development as a significant investment in renewable energy."</i></p> <p>[Paragraph 4.2.1]</p> <p><i>However, we remain interested in any proposals as the Applicant put forward during Examination which would secure low carbon initiatives which can be introduced to offset carbon impacts within, for example, a Community Benefits commitment, discussions on the same will continue.</i></p> <p>[Paragraph 4.2.2]</p>	The Applicant welcomes the comments made with regards the Project's role as a significant investment in renewable energy. North Falls will continue to engage with Essex County Council about low carbon initiatives considered during the Project's detailed design process, post-consent.
LIR_ECC_4.3	Highways and Transportation	n/a	<p>The Applicant notes that the Councils' LIR raises traffic and transport matters that were not included/summarised within the Essex County Council's Relevant Representation (as Local Highway Authority), equally some matters raised do not reconcile with the extensive agreements and consultation that has been undertaken between the parties to date.</p> <p>The Applicant therefore is seeking a meeting with Essex County Council to provide clarifications and to understand Essex County Council's position with respect to these matters. Noting the need to re-engage with Essex County Council on these matters and the short timescales between the submission of the LIR and Deadline 2, the Applicant does not propose to provide a further response to the matters raised within the LIR at this stage.</p> <p>It is proposed that the matters will be discussed with Essex County Council and a summary of agreements and matters requiring further clarifications will be provided to the ExA through the submission of the SoCG between the parties at an appropriate future deadline.</p>
LIR_ECC_4.4	Public Rights of Way (PRoW)	<p><i>"The PROW Team wishes to commend the applicant and their agents on the depth, clarity and thoughtfulness of the information provided in respect of the PROW impact/mitigations, and agree, in general, with the measures proposed, apart from the following which they may be able to clarify."</i></p> <p>[Paragraph 4.4.6]</p> <p><i>"It is noted that the applicant has provided a Public Rights of Way Plan which has the ExA reference APP-206. At page 12 of the same (sheet 9 of 16) and within the same the Applicant have shown an out-of-date alignment and number for Footpath 3... Hence it is requested that an amended plan is submitted during the course of Examination for the final Public Access Management Plan (PAMP). The Councils confirm there are no other discrepancies."</i></p> <p>[Paragraph 4.4.2 – 4.4.4]</p> <p><i>"Mitigation measures requirement</i></p> <ul style="list-style-type: none"> <i>i. Does the use of trenchless techniques for the circuit installation mean that plant and materials vehicles will not need to cross the PROW where this is mentioned?</i> <i>ii. In respect of Operational and Maintenance (O&M) access it is accepted that this will be necessary and recognise that this is anticipated to involve a very</i> 	<p>The Applicant welcomes the Councils' and PRoW Team's comments on the Outline Public Rights of Way Management Plan (OPRoWMP) [APP-252].</p> <p>The Applicant notes the change to the PRoW layout within the onshore project area around Tendring Brook identified by Essex County Council, and will update the OPRoWMP [APP-252], PRoW Plan [APP-206] and Schedule 3 Part 2 of the Draft DCO [REP1-011] accordingly, and submit these to the ExA at Deadline 3.</p> <p>In response to the specific clarifications made in the LIR on this subject:</p> <ul style="list-style-type: none"> i. For trenchless crossings of PRoW where no haul road is required, plant and materials vehicles will not need to cross the PRoW (applies to four PRoW). For trenchless crossings of PRoW where a haul road <u>is</u> required, plant and material will need to cross the PRoW during the construction period (applies to four PRoW). The PRoW which fall into each of these categories are summarised in Table 3.1 of the OPRoWMP [APP-252]. For those PRoW which do require a haul road, this will be managed through a 'managed crossing', as detailed in Section 4.1.1 of the OPRoWMP [APP-252]. ii. Paragraph 23 of the OPRoWMP [APP-252] will be updated include a consideration of protective measures for tracking light vehicles across PRoW, should they be required due to the ground conditions encountered at the time of use.

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		<p><i>small number of light vehicles driving at walking pace. However, the applicant should reflect that most PROW (especially in a predominantly rural district like Tendring) will be naturally surfaced on clay soil and in many cases are therefore not suited to vehicular use (esp. in wet conditions). Should damage result from O&M vehicle use we would of course expect those responsible to remedy it as vehicle use is not commensurate with these PROW and therefore not a public purse responsibility, whereas 4.3 Operation and maintenance Section 23 within APP-252 doesn't acknowledge the possibility of this circumstance in respect of remedial works.</i></p> <p>iii. <i>Where temporary diversions or closures are proposed, we would request that in addition to the sensible measures already indicated in the Outline PAMP (APP-252)., that key stakeholders (PROW Maintenance team, parish councils, main user groups e.g. Ramblers and EBA/BHS) are given prior notice where practically possible. It would also be very beneficial if the applicant's website provided information on temporary diversions and closures as well as providing their contact details for any issues to be reported. Although this information may already be included in the on-site signs, these may come off or become illegible due to the weather, dirt etc. and would not help those planning walks/rides in advance.</i></p> <p>iv. <i>The Council's will comment on the submission of any future PAMP at a future ExA Deadline following receipt."</i></p> <p>[Paragraph 4.4.7]</p>	<p>iii. Section 4.1.2 of the OPRoWMP [APP-252] will be updated to include a statement that key stakeholders (PROW Maintenance team, parish councils, main user groups) are given prior notice where practically possible, and for temporary diversions and closures to be flagged on the Applicant's website.</p> <p>iv. Noted.</p> <p>The Applicant intends to make the updates to the OPRoWMP [APP-252] and submit it into the Examination at Deadline 3.</p>
LIR_ECC_4.5	Ecology & Biodiversity Net Gain (BNG)	<p><i>"We highlight that Local Wildlife Sites in Essex are known as LoWS not LWS and request that the Glossary of the BNG Strategy (APP-257) is amended. We appreciate the willingness to deliver a minimum of 10% BNG) despite this not being a mandatory requirement for NSIPs yet and seek to continue to work with the applicant's team to secure effective and functional BNG on land in line with the emerging Essex Local Nature Recovery Strategy (LNRS). We seek reassurance that BNG habitats created or enhanced will have at least 30 years secured for management not just their establishment phase to avoid being considered as losses from the development. This will ensure the promised BNG will be delivered, or the Councils will consider any areas where this is not secured as losses. Whilst we accept that watercourse biodiversity units are difficult to create or enhance on site, we would support the identification of local offsite measures to deliver the missing units."</i></p> <p>[Paragraph 4.5.2.8]</p> <p><i>"We also highlight the need to deliver Environmental Net Gain (EnvNG) – see National Policy Statement (NPS) EN-1 Sections 4.6.1 – 4.6.3 - as 47 required by the Regulator and again seek reassurance on its long-term management to ensure its promised benefits are delivered for the local community."</i></p> <p>[Paragraph 4.5.2.9]</p> <p><i>"We note that Nathusius' Pipistrelle was recorded in the Bat Activity Surveys (APP - 132 and APP-133) from April to October 2022, including at the coast near the landfall however this migratory species is not referenced in the conclusion. We highlight that national and local bat survey information, particularly through volunteer participation in the National Nathusius' Pipistrelle Project, also indicates that the presence of this migratory species is now established in Essex, including the coast near the landfall</i></p>	<p>The Applicant's welcomes the Councils' comments regarding the mitigation committed to through the Outline Landscape and Ecological Management Strategy (OLEMS) [REP1-035], and the approach to BNG.</p> <p>The Applicant notes the request in paragraph 4.5.2.8 to update the glossary in the BNG Strategy [APP-257], and this amendment will be made and an updated version of the BNG Strategy submitted at an appropriate future deadline.</p> <p>In response to the comments on BNG in paragraph 4.5.2.8 of the LIR, the Applicant can confirm that, as set out in the BNG Strategy [APP-257], any area habitat creation and enhancement which takes place and contributes towards the Project's BNG target will require a minimum 30-year monitoring and maintenance period of its condition. This excludes any habitat reinstatement, as well as arable habitats as they do not receive a condition score within the Defra Statutory Biodiversity Metric. This is due to the artificial nature of arable habitats, the state of which relies entirely on anthropogenic influences. These influences make it impossible to determine habitat condition as this could vary with crop type, time of year and agricultural practices used.</p> <p>Hedgerows will be subject to post re-instatement surveys to ensure successful establishment of habitat and that they have achieved their target condition, up to five years after scheme completion. After five years it will be assumed that the landowner will continue to maintain the area as they deem fit. These areas will be specifically excluded from the 30-year monitoring and management plan once they have been confirmed as reaching their target condition. This is because firstly this land is only subject to temporary works, and therefore is returned to landowners' ownership following the completion of construction and reinstatement, and secondly North Falls would not have the appropriate rights to manage the hedgerows in question beyond the 30m extent needed to deliver the Project, therefore meaning different management regimes would be in place along the hedgerow's length.</p>

Applicants Ref	Theme	Key Paragraphs of LIR	Applicant's Response
		<p><i>for the cable corridor. ECC notes the submissions made by other parties (such as the German Federal Maritime and Hydrographic Agency with the ExA for Five Estuaries OWF Ref RR-035)) in relation to the potential impacts of offshore wind farms on the migratory bat, the Nathusius' Pipistrelle (Pipistrellus nathusii).“</i></p> <p>[Paragraph 4.5.2.10]</p>	<p>The Applicant notes that a BNG Strategy Technical Note [REP1-050] was submitted in the Examination at Deadline 1, which provide an example calculation, if these habitats were to be considered as losses. This shows that >17% BNG would be achieved for the hedgerow module, whilst approximately 7% net gain would be achieved for the area habitats module without the inclusion of offsite units. The Applicant reasserts that these calculations will be updated post-consent following detailed design, as secured by Requirement 21 of the Draft DCO [REP1-011], when a refined project footprint is expected to lead to a refinement of these values, and any decision regarding inclusion of offsite units will be made at this point.</p> <p>The Project will secure Environmental Net Gain (as noted in paragraph 4.5.2.9 of the LIR) both through the proposal for BNG, and also the measures for habitat enhancement secured through the OLEMS [REP1-035].</p> <p>In relation to the comments relating to migratory Nathusius pipistrelles in paragraph 4.5.2.10 of the LIR, please refer to the comments provided at Applicant's Ref LIR_SCC_06a below.</p>
LIR_ECC_4.6	Landscape	<p><i>“We are concerned that it will take up to 15 years for the mitigation to take full effect, which is half the identified expected 30-year life of the substation. We also judge that the proposed mitigation planting does not reduce all the negative effects on the immediate landscape, its setting and visual receptors to non-significant.”</i></p> <p>[Paragraph 4.6.4]</p> <p><i>“The N2T pylons and the as proposed substation do not appear to be identified in the cumulative LVIA visualisations, and therefore it is assumed they haven't formed part of the LVIA cumulative impact assessment itself. The pylons form will form part of the DCO for the Norwich to Tilbury project, along with the EACN so their cumulative impact needs to be considered.”</i></p> <p>[Paragraph 4.6.6]</p> <p><i>“The Councils would expect to see compensation offered for any residual landscape and visual effects in line with National Policy EN1 Paragraph 4.1.5 ‘In considering any proposed development... the Secretary of State should take into account: • its potential adverse impacts...including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy’ (Our emphasis).”</i></p> <p>[Paragraph 4.6.7]</p>	<p>In relation to paragraph 4.6.4 of the LIR, Table 30.35 of ES Chapter 30 LVIA [APP-044] summarises year 1 and year 15 landscape and visuals effects. This highlights that whilst maturing landscape mitigation will help to reduce the associated landscape and visual effects of the proposed onshore substation, some localised significant effects will remain due to the presence of the development. This is not unusual, as any type of new development of this scale is likely to result in some localised change. The assessment of effects at Norman's Farm (Viewpoint 3) presented in Table 30.23 of ES Chapter 30 LVIA notes that <i>“The influence of electricity infrastructure on the view will reduce as planting matures. It is also acknowledged that this screen planting will itself have an impact on the currently open view.”</i></p> <p>The Design Vision [APP-234] and OLEMS [REP1-035] set out the approach to mitigation, which is in keeping with existing landscape characteristics. Mitigation and enhancement measures also draw on published landscape guidelines, aligning with the Landscape Strategy for the Bromley Heaths LCA and Statements of Opportunity for the Northern Thames Basin NCA.</p> <p>During the next stage of design collaboration, the Applicant and Five Estuaries have committed to production of a Design Guide (see Section 1.4.3 of the Design Vision [APP-234]). This will consider the design of mitigation in further detail, with the opportunity to tailor the composition of planting mixes on a location-specific basis i.e. greater percentage of evergreen species, faster-growing species, greater percentage of more mature stock etc. The Design Guide will also identify locations for advance planting.</p> <p>The Written Landscape Scheme, secured by DCO Requirement, will set out full details of the landscape mitigation measures which will be implemented as part of the Project. This will be subject to review and approval by Essex County Council (as discharging authority) in consultation with Natural England. The Written Landscape Scheme will be based on the OLEMS [REP1-035] and will include full details of proposed mitigation planting including planting mixes and sizes.</p> <p>In relation to paragraph 4.6.7 of the LIR, paragraph 121 of ES Chapter 30 LVIA [APP-044] confirms which projects have been considered in the cumulative assessment. This includes the Norwich to Tilbury project (and associated 400kV overhead lines). Table 30.32 of the LVIA provides the detail of the cumulative assessment. Where relevant, reference to the Norwich to Tilbury overhead lines is made, in the context of an alternative</p>

Applicants Ref	Theme	Key Paragraphs of LIR	Applicant's Response
			<p>theoretical future cumulative baseline which includes this project. Although not shown in visualisations due to a lack of available information at the time, the cumulative impact of the overhead lines has been considered.</p> <p>The Applicant notes that outline landscape mitigation is proposed through the OLEMS [REP1-035], which also includes environmental enhancement measures including:</p> <ul style="list-style-type: none"> • Ensuring woodland plantation as part of landscaping follows the Essex County Council guidance Essex Tree Palette: A guide to choosing the most appropriate tree species for Essex sites according to landscape character and soil type; • Use of Sustainable Drainage Systems (SuDS) in line with the Essex Green Infrastructure (GI) Strategy; • Strategic planting to ensure habitat connectivity is created with the surrounding landscape, in line with the Essex GI Strategy; • Retention of trees and hedgerows where possible, in line with the Essex GI Strategy; and • Planting of lowland meadow UK Habitat of Principle Importance (UKHPI) as listed in Section 41 of the Natural Environments and Rural Communities Act (as amended) 2006. • Reptile and amphibian hibernacula, placed to create transitional areas between areas of woodland and grassland; • Scrape creation within open grassland for butterfly and moth species dependent on colonising plant species. Such areas would also provide basking habitat for reptiles; • Sustainable Drainage System (SuDS) pond design will be tailored to ensure suitability for supporting breeding amphibians. <p>In relation to paragraph 4.6.7, the focus is on the reduction and mitigation of landscape effects as far as possible, and the Applicant is not proposing compensation for residual landscape effects.</p>
LIR_ECC_4.7	Green Infrastructure	<p><i>“Having reviewed the Draft Development Consent Order (APP-005), BNG Strategy, Environment Statement (APP-257), Design and Access Statement (APP-234), Outline Landscape and Ecological Management Strategy (OLEMS) (APP-249) and the associated documents which accompanied the planning application, ECC raise the following points:</i></p> <ol style="list-style-type: none"> <i>We welcome that the GI teams previous comments to the EIA Scoping opinion has been considered as part of the Environment Statement (APP-036 & APP-037) and that the Essex GI Strategy have been reviewed and has fed into the BNG Strategy (APP-257) and that a GI Plan (APP-134) had been produced to accompany the ES, aligning with the National GI Framework and Essex GI Standards (2022).</i> <i>ECCs GI team promotes the delivery GI though the ‘Lawton Principle’ which advocates for a landscape-scale approach to conservation and the enhancement of connection between green sites- either through physical green corridors or through ‘stepping-stones’. A bigger, better, and connected approach to GI delivery ensures the delivery of multiple functions and benefits to people and wildlife. For example, enhances biodiversity (both through the delivery of new habitats and wildlife corridors), natural screening, flood and water management and improves the character and sense of place.”</i> 	<p>The Applicant's welcomes ECCs' acknowledgment that GI has been considered within the application. With regards some of the specific recommendations made in the response, the Applicant has the following comments:</p> <ul style="list-style-type: none"> • The Applicant would like to clarify that the outline landscape mitigation plan is shown in Figure 30.1.6 in ES Chapter 30 Figures Part 1 of 6 [APP-083]. The Applicant is of the view that changes to the wording of Requirement 7 of the draft DCO requirements amendments to specifically mention plans is not necessary. • The Applicant agrees with the suggestion in paragraph 4.7.16 to amend the wording of Requirement 21 of the Draft DCO [REP1-011] to 'Works no. 11 and 12 shall not commence...' and has made this amendment to the Draft DCO submitted at Deadline 2. • The Applicant would like to clarify that a Habitat Management and Monitoring Plan for any habitat used to secure BNG would form a part of the Ecological Management Plan, secured under Requirement 12 of the Draft DCO [REP1-011]. • The Applicant notes the points raised with regard to the Essex Local Nature Recovery Strategy which is currently out for consultation, and this will be considered when defining 'strategic significance' in the BNG calculations undertaken post-consent and secured through the BNG Strategy [APP-257].

Applicants Ref	Theme	Key Paragraphs of LIR	Applicant's Response
		<p>[Paragraph 4.7.4]</p> <p><i>"It is recommended for the Provision of landscaping 7.— (1) to include the reference to plans in line with the recommendations to provide further clarity within the OLEMP that detailed plans will be produced. i.e. "written landscape schemes, plans..."</i></p> <p>[Paragraph 4.7.9]</p> <p><i>"If option 2 for a joint approach it is recommended to align with Five Estuaries DCO who has proposed changes to their requirement 20 to state that 'Work No. 15 may not commence until a net gain strategy has been submitted to and approved by the relevant planning authority'. The aim was to try to resolve any confusion as to the approach to BNG by preventing building of permanent elements at the Onshore Substation rather than stages, since the BNG delivery is targeted to Onshore Substation area, rather than the cable corridor."</i></p> <p>[Paragraph 4.7.16]</p> <p><i>"...It is not clear if this or the final Ecological Management Plan (EMP) will contain the management maintenance for habitats delivering BNG. Although the requirements for a HMMP, are not mandatory until November 2025 they are considered good practice. However, if the Landscape and Ecology Management Plan (LEMP) encompasses all necessary elements of the HMMP, it will be sufficient."</i></p> <p>[Paragraph 4.7.17]</p> <p><i>"The BNG Strategy (page 10, par 21) states that LNRS for Essex does not exist. The Public Consultation for the Essex LNRS closed on 24 October 2024 and will be published Summer 2025. It is recommended that this is monitored and taken into consideration. It will identify areas of current importance for biodiversity and strategic opportunity locations for habitat creation and improvement and off-site biodiversity provision. This will ensure a strong relationship between new development proposals and relevant strategic opportunity locations."</i></p> <p>[Paragraph 4.7.18]</p> <p><i>"It is recommended that landscaping be added to Substation Works 5.— (1) on page 44 (46 of 190). Construction of Work No. 11 (onshore substation) and this must not commence until details of that work, including landscaping, have been submitted to and approved by the relevant planning authority."</i></p> <p>[Paragraph 4.7.20]</p> <p><i>"The EMP should also specify who is responsible for GI assets (including any surface water drainage systems), the timelines for implementing each aspect of GI during the development phase to encourage early growth where feasible, maintenance activities and their frequencies, and the funding, management, and monitoring of GI assets for the permanent works and approved landscaping for the Onshore Substation. This ensures that appropriate management, maintenance arrangements, and funding mechanisms are in place to sustain the high-quality value and benefits of the GI assets. New Tree Planting and their early establishment</i></p> <p>[Paragraph 4.7.26]</p>	<ul style="list-style-type: none"> • The Applicant does not propose amending the wording of the DCO as suggested in paragraph 4.7.20, as provision of written details of landscaping prior to construction is already secured through Requirements 7 of the Draft DCO [REP1-011]. • The Applicant accepts the recommendations made in paragraphs 4.7.26 and 4.7.27 regarding responsibility for GI assets and tree planting requirements, and will update the OLEMS [REP1-035], to incorporate these suggestions, and submit it to the ExA an appropriate future deadline.

Applicants Ref	Theme	Key Paragraphs of LIR	Applicant's Response
		<p>"The EMP to include measures for early establishment of new trees to be considered at the time of planting, which is often insufficient leading to poor 55 survival rate of young trees, and due to rainwater levels being low in the Tendring area. This should include weeding, mulching and watering. All newly planted trees with a trunk diameter of 6cm or more will be watered for three years via a buried watering tube, irrigation bag or irrigation well; applying 60 litres per visit, at least 14 times between May and September. Mulch, stakes, ties and weed establishment will also be inspected and actioned as required. Stakes and ties should be removed 3 years after planting."</p> <p>[Paragraph 4.7.27]</p>	
LIR_ECC_4.8	Archaeology	<p><i>"The Councils do not consider that the extent of assessment across the entirety of the route is sufficient to assess the nature, extent and significance of archaeological and geoarchaeological remains. This is especially relevant in the Landfall area where impacts are yet to be fully considered."</i></p> <p>[Paragraph 4.8.49]</p> <p><i>"Desk-based research and non-intrusive methods are not considered to provide an accurate assessment of significance or identify potential adverse effects."</i></p> <p>[Paragraph 4.8.50]</p> <p><i>"The information provided with the DCO application does not allow an accurate assessment of known archaeological remains along the full length of the route."</i></p> <p>[Paragraph 4.8.51]</p> <p><i>"The proposed post-consent mitigation for the initial assessment of archaeological remains in the project area is not considered adequate or sufficient for a project of this scale."</i></p> <p>[Paragraph 4.8.52]</p> <p><i>"The reliance on the proposed mitigation strategy of avoidance through design and micro siting may cause considerable risk to the project timetable and cost and negatively impact on the archaeological investigations that may be required following the trial trench evaluation and assessment of geoarchaeological deposits."</i></p> <p>[Paragraph 4.8.53]</p> <p><i>"In their current form the Requirements including CoCP and draft DCO wording do not provide sufficient measures to ensure that archaeological, geoarchaeological and paleoenvironmental remains are appropriately considered."</i></p> <p>[Paragraph 4.8.54]</p>	<p>The Applicant notes the comments made.</p> <p>In response to paragraphs 4.8.49, 4.8.50 and 4.8.51, the Applicant considers the baseline to form a proportionate basis on which to base the ES assessment and to make an informed judgement on the impacts of the development upon the heritage significance of known and potential archaeological remains, and inform an effective mitigation strategy of the identified effects as detailed within the Outline Onshore Written Scheme of Investigation (WSI) [APP-247].</p> <p>In response to paragraphs 4.8.52 and 4.8.53, the Applicant is in discussion with Essex County Council (Places Services) and Historic England (in combination with Five Estuaries) to agree a programme of project-wide trial trenching and geoarchaeological evaluation post-consent to inform the detailed design phase and archaeological mitigation approaches and manage risk in delivery. The Applicant is following the approach discussed with Five Estuaries and is in the process of drafting an Archaeological Mitigation Strategy and Trial Trench Plan, and updating the Outline Written Scheme of Investigation [APP-247] to be submitted into the Examination at Deadline 5.</p> <p>In response to paragraph 4.8.54, the Applicant has submitted, at Deadline 1, a revised OCoCP [REP1-033] and draft DCO [REP1-011] to reflect the discussions and agreements made between the Applicant, Essex Place Services and Historic England, in combination with Five Estuaries.</p>
LIR_ECC_4.9	Built Heritage	<p><i>"The proposed Onshore Project Area (landward cable connection and substation) has been identified as have a negligible adverse effect on designated heritage assets within the study area, albeit the level of harm has not been explicitly stated. Although, the Onshore Archaeology and Cultural Heritage ES Chapter (APP-039) does not fully address Construction effects on the significance of the identified</i></p>	<p>In response to paragraph 4.9.3.1, this is a result of how the assessment within the ES is presented in terms of the language used in the Regulations. In Section 25.6.1.4 of ES Chapter 25 Onshore Archaeology and Cultural Heritage [APP-039], the assessment concludes that the significance of effect from changes to the setting of designated heritage</p>

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		<p><i>heritage assets. It is considered that this harm would result from both the construction and operational phases of the development.</i></p> <p>[Paragraph 4.9.3.1]</p> <p><i>"It is agreed that the Offshore development would cause no harm to the significance of the identified heritage assets due to their only being noticeable on days of 'Excellent' visibility, given their distance from the shore."</i></p> <p>[Paragraph 4.9.3.3]</p>	<p>assets during construction are "minor adverse" which equates to "less than substantial harm at the lower end of the scale". It is acknowledged in the ES chapter that while there may be some change to setting during construction, any change would be temporary and, in respect of the onshore cable route, will be reversible. Therefore, the magnitude of impact is no greater than negligible adverse. Changes to setting during the operation phase are assessed in Section 25.6.2.1 of ES Chapter 25 Onshore Archaeology and Cultural Heritage [APP-039], which concludes "no change" to the designated heritage assets identified as potentially affected by the permanent presence of above ground onshore infrastructure.</p> <p>The Applicant and ECC are seeking to hold a further discussion on built heritage matters to discuss and resolve the points raised here.</p>
LIR_ECC_4.10	Socio-Economics	<p><i>"The structure and methodology of the application is very strong from an employability and skills perspective. It is generally accepted that the scheme will achieve socio economic benefits during construction and post construction. Where possible Essex County Council wish to minimise short term negative impacts during the construction phase of development."</i></p> <p>[Paragraph 4.10.10]</p> <p><i>"The cumulative impact of significant construction/infrastructure projects in the county requires consideration. Consideration should include the timing/phasing of the projects and inter-project impacts – including the transportation of construction materials and availability of labour. This should be considered as part of the 'future baseline' scenario."</i></p> <p>[Paragraph 4.10.11]</p> <p><i>"The inclusion of the skills and employment strategy is a great addition to the documents for this application. We welcome continued engagement with ourselves, the applicant and key partners to develop the plan, securing ambitious targets for the development of employment and upskilling opportunities for Essex residents."</i></p> <p>[Paragraph 4.10.12]</p>	<p>The Applicant welcomes the comments made with regards the Project's socio-economic assessment and Outline Skills and Employment Plan [APP-253].</p> <p>ES Chapter 31 Socio-economics [AS-010] has included a detailed cumulative effects assessment in Section 31.8, which has considered the potential overlap between the construction and operation of other projects, including regarding construction traffic and labour supply.</p>
LIR_ECC_4.11	Tourism	<p><i>"As for the impact on tourism, which is identified as a key component of the adopted Tendring District Local Plan 2013 – 2033 and Beyond, Policy PP8 (Section 2 of the Plan) identifies tourism as a key component to the areas socioeconomic profile is worth more than £276 million to the Tendring District. With the area containing a significant number of tourist destinations, and a wide variety of differing types of available accommodation, tourism is the main contributor to the local economic job profile, whether that is directly in hotels, caravan and chalet parks and tourist attractions or indirectly in shops, cafés and restaurants. The landward side of the construction works as proposed by this DCO proposal could have a significant impact on the areas attractiveness to tourism, with disturbance to both the attractiveness of the rural landscape and transportation as a result of the DCO within the wider Tendring peninsular."</i></p> <p>[Paragraph 4.11.1]</p>	<p>The Applicant has considered the effects of the Project on tourism receptors in detail in ES Chapter 32 Tourism and Recreation [APP-046]. This has included consideration of the effects upon tourism receptors arising from, including:</p> <ul style="list-style-type: none"> • Tourists requiring temporary local accommodation; • Tourism economy; • Members of Frinton Golf Club; • Visitors to Frinton Golf Club; • Users of Frinton beach huts; • Users of PRoW and long distance trails; • Users of King Charles and NCN Route 150; • Guests at the Rock Hotel; • Users of Tendring Green Allotments; • Users of Frinton Beach, Holland Haven Country Park and Greensward Park; • Users of designated bathing waters. <p>The Project has committed to a series of mitigation measures to minimise effects upon tourism receptors, which have been embedded into the design of the Project. These are</p>

Applicants Ref	Theme	Key Paragraphs of LIR	Applicant's Response
			<p>detailed in Table 32.3 in ES Chapter 32 Tourism and Recreation [APP-046] and are summarised here:</p> <ul style="list-style-type: none"> • Consideration of tourism assets and PRowS during the Project's onshore site selection; • Using short 'work fronts' during construction, to minimise the temporal extent of effect in any one area as far as possible; • Commitment to install the cables at the landfall using horizontal directional drilling (HDD), thereby avoiding physical disturbance or prolonged access restrictions to Frinton Beach and Holland Haven; • Commitment to using trenchless crossing techniques such as HDD at major crossings such as major roads, river, and rail crossings; • Development of an OPRoWMP [APP-252] to minimise disturbance to users of PRow; • Perimeter safety zones in place to separate the works area from public spaces; • Commitment to no overheads lines; • Community engagement during the consenting process, and provision of a dedicated Community Liaison Officer during construction (as detailed in the Outline Code of Construction Practice [REP1-033]). <p>Implementation of these mitigation measures had led the assessment detailed in ES Chapter 32 Tourism and Recreation [APP-046] to conclude no significant adverse residual effects upon tourism receptors, including cumulative with other projects, during construction and operation of the Project.</p>
LIR_ECC_4.12	Minerals & Waste	<p><i>"In accordance with the policy, a MRA is presented within the evidence base supporting this application with the ExA's library reference APP-113. The MWPA has reviewed the MRA and accepts the conclusion that prior extraction is not practical. The MWPA notes that a MRA without intrusive ground investigation across the project area would not normally be accepted but in this instance the MWPA is satisfied that prior extraction has been demonstrated as not being practical due to the sinuous nature of the development site. It is also accepted that the proposal is temporary in nature with the potential to sterilise mineral being for the life of the Project only. As such, the mineral underlying the proposed development will not be permanently sterilised. On decommissioning of the Project, it is anticipated that the minerals beneath the Project infrastructure would be available for mineral extraction. The MWPA further notes that any future extension of time for the development would allow for mineral safeguarding issues to be re-assessed at that point in time. On that basis, the MWPA considers that the potential for prior extraction has been sufficiently investigated and no further action is currently required in this regard."</i></p> <p>[Paragraph 4.12.4]</p>	<p>The Applicant welcomes the comments made with regards the Project's assessment of the impact on minerals, and agrees with the conclusion of the Councils' LIR on these matters.</p>
LIR_ECC_4.13	Flood Risk, Drainage and Surface Water	<p><i>"From the current submission ECC as the LLFA would however wish to see additional details submitted, and clarification provided, where they relate to proposals for the substation site, which are:</i></p> <ol style="list-style-type: none"> <i>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.</i> <i>Confirmation of the discharge rate is required from the applicant.</i> <i>ECC ask how will the permanent access road will drain, will it be unrestricted? Is the swale sufficient treatment for the road? What is the</i> 	<p>The Applicant is in discussions with Essex County Council regarding the points raised in relation to the Outline Operational Drainage Strategy [APP-254], and will provide an update at a subsequent deadline.</p>

Applicants Ref	Theme	Key Paragraphs of LIR	Applicant's Response
		<p>expected usage? The details as within the submission are unclear at this time.</p> <p>iv. When will infiltration testing be undertaken? It is preferable to undertake tests in winter months when worst case scenario can be established and testing should be undertaken at the earliest opportunity.</p> <p>v. The applicant is asked to note that Section 23 consent will be required for the headwalls and culverts."</p> <p>[Paragraph 4.13.9]</p>	
LIR_ECC_4.14	Health	N/A	The Applicant agrees with the Councils regarding the potential effects upon Human Health, as concluded within ES Chapter 31 Human Health [APP-042] .
LIR_ECC_4.15	Noise	<p>"The Councils are of the view that a Joint Noise Complaint Handling Protocol is absolutely necessary, to protect the amenity of adjacent local residents during the operational phase of the as proposed sub stations, to ensure a coordinated and consistent approach to addressing noise complaint(s) during operational stage quickly and concisely so any noise complaint can be actioned in good time. A good complaints process should be accessible, user-focused, timely, objective, resolution-focused and a tool for learning and improvement. Therefore, the protocol should include the following:</p> <ol style="list-style-type: none"> I. outline how the 3 substations will work together to investigate and resolve complaint(s) and liaise with the existing substation. II. a collective Noise Investigation Panel should be established, consisting of representatives from each of the three collocated substations. This would mean Five Estuaries, North Falls and National Grid each should appoint at least one member of staff to be Complaints Officer responsible for dealing with any noise complaints. The Complaints Officers must have access to staff at all levels to facilitate the quick resolution of complaints and report on compliant handling performance. They must also have the authority and autonomy to act to resolve disputes quickly and fairly. The contact methods and/or details of the Panel/Complaint Officers should be clearly displayed at each of the substations and provided to the Local Planning Authority. III. define clearly who will takes the lead in handling a complaint based on the initial investigation, while outlining the roles of other parties; IV. specify how information will be shared between the operators during the complaint handling process, including updates to the complainant; V. set clear and measurable expectations for response times and escalation procedures to ensure prompt resolution of complaints." <p>[Paragraph 4.15.9]</p> <p>"The Councils propose that if/once a complaint is received all three representatives put their protocols in place to check if there is any underperforming / faulty equipment on their individual sites. The turnaround time for these tests will be 48 hours. If a site identifies a specific issue with their kit, this will be reported to the other members of the Noise Investigation Panel. The party with the identified fault will be responsible to remedy the fault within 2 working days. Any remedy offered must reflect the impact on the individual as a result of any fault identified. The remedy offer must clearly set out what will happen and by when, in agreement with the individual where appropriate. Any remedy proposed must be followed through to completion."</p> 	<p>The Applicant has been involved in the development of <i>Onshore substations operational noise and the outline noise complaints protocol</i> document developed jointly by Five Estuaries, National Grid Electricity Transmission (NGET) as the promoter of the Norwich to Tilbury project, and the Applicant, a previous version of which has been submitted into the Five Estuaries Examination (Five Estuaries application reference: REP5-088). This protocol addresses the issues raised in the Councils' LIR.</p> <p>Five Estuaries, NGET and the Applicant are currently in the process of updating the protocol, and the Applicant will submit the latest version of the document into the Examination Deadline 3, once updated.</p>

Applicants Ref	Theme	Key Paragraphs of LIR	Applicant's Response
		<p>[Paragraph 4.15.10]</p> <p><i>"In the event that no faults are identified on any individual substation, the Panel will then take steps to address the noise breach as a collective. The Councils are clear that such a cumulative impact is the responsibility of all three developments to address. For example, the developments may wish to explore appropriate locations for sound barriers as an effective and fast solution to the noise breach. All three developments will contribute to the commissioning of, and payment for remedial works to be carried out within 7 days of confirmation that no individual substation is at fault / or after any faults have been rectified. The Councils believe that the developments should work collaboratively to resolve the issue and reduce the negative impacts on those affected residents."</i></p> <p>[Paragraph 4.15.11]</p>	

2.2 Applicant's Response to Babergh District Council's Local Impact Report [REP1-063]

Table 2.2 Applicant's Response to Babergh District Council's Local Impact Report

Applicants Ref	Theme	Key Paragraphs of LIR	Applicant's Response
LIR_BDC_01	Substation	<p><i>Babergh District Council is principally concerned with the potential visual and landscape impacts of the onshore elements of the proposed development on the landscape of Babergh District including the Dedham Vale National Landscape and its setting. This LIR submission focused therefore solely on those matters.</i></p> <p>[Paragraph 1.1]</p> <p><i>Babergh District Council is concerned that there is the potential for residual adverse visual impacts from the Onshore Substation on the setting of the designated Dedham Vale National Landscape, due to its scale.</i></p> <p>[Paragraph 1.3]</p> <p><i>In addition, there are concerns that the cumulative effects of North Falls with the proposed Five Estuaries onshore substation, the East Anglian Connection Node (EACN), and the pylons that are proposed to connect to it from the Norwich to Tilbury (N2T) scheme would have a significant cumulative effect.</i></p> <p>[Paragraph 1.4]</p> <p><i>Substation</i></p> <p><i>"This is of particular concern given that there is now a strengthened duty to 'seek to further' the statutory purpose of National Landscapes. It is considered that the Onshore Substation could undermine that statutory purpose and insufficient evidence has been provided to demonstrate that this duty has been complied with."</i></p>	<p>The Applicant has summarised the effects on Dedham Vale National Landscape in response to Natural England's Relevant Representation [RR-243] (specifically Applicant's Ref NE-44, NE Ref P33) (see Applicant's Response to Relevant Representations from Natural England [REP1-044]). It is copied here below.</p> <p>Figure 30.1.4 [APP-083 – APP-088] of ES Chapter 30 LVIA [APP-044] highlights the location of National Landscapes (NL) in relation to the proposed North Falls onshore substation. The southern extent of the Dedham Vale NL is just within 2km of the proposed North Falls onshore substation.</p> <p>The ZTV (Figure 30.1.2 [APP-083 – APP-088]) highlights the very limited nature of visibility associated with the proposed North Falls onshore substation, from the Dedham Vale NL. Viewpoint 8 (refer to Figure 30.2.8 [APP-083 – APP-088]), which is taken from a location on the southern edge of the NL (Essex Way, Dedham Road) represents some of the closest and potentially 'worst case' views from the NL.</p> <p>From this location hedgerow and woodland cover, across the relatively flat intervening landscape between the southern edge of the NL and the North Falls onshore substation, play a notable screening role. As such, the potential for cumulative effects, in which the proposed North Falls onshore substation plays a role, is very limited. The assessment presented in ES Chapter 30 LVIA [APP-044] concludes a negligible effect upon the Dedham Vale NL as a result. Any visibility of the Norwich to Tilbury EACN substation, in the vicinity of the North Falls and Five Estuaries onshore substations, would therefore give rise to stand-alone effects associated with the Norwich to Tilbury project only. A combined outline landscape strategy for the proposed North Falls and Five Estuaries onshore substations is provided in the Design Vision [APP-234] at Figure 20).</p>

Applicants Ref	Theme	Key Paragraphs of LIR	Applicant's Response
		[Paragraph 1.8]	<p>Section 1.4 of the Design Vision [APP-234] identifies the process for design development post-DCO consent. This design process identifies preparation of a Design Guide to inform detailed design proposals.</p> <p>The Applicant's comments in relation to the amended duty under Section 85 of the Countryside and Rights of Way Act (2000) regarding National Landscapes is set out in response to the relevant representation from the Suffolk and Essex Coast and Heaths National Landscape Authority [RR-316] as outlined within the Applicant's Response to Relevant Representations from Statutory Consultees and Non Prescribed Consultees [REP1-045]. The Applicant's position is that it has complied with the amended duty.</p>
LIR_BDC_02	Cumulative Effects	<p><i>"The N2T pylons do not appear to be identified in the cumulative LVIA visualisations, and therefore it is assumed they haven't formed part of the LVIA cumulative impact assessment itself. The pylons will form part of the DCO for the Norwich to Tilbury project, along with the EACN so their cumulative impact needs to be considered."</i></p> <p>[Paragraph 1.12]</p> <p><i>"Babergh District Council would expect to see compensation offered for any residual visual effects in line with National Policy EN1 Paragraph 4.1.5 'In considering any proposed development... the Secretary of State should take into account: • its potential adverse impacts...including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy' (Our emphasis)"</i></p> <p>[Paragraph 1.13]</p>	These points are discussed in the Applicant's response to LIR_ECC_4.6 above, in relation to the ECC and Tendring District Council LIR which raises the same observations.

2.3 Applicant's Response to East Suffolk Council's Local Impact Report **[REP1-064]**

Table 2.3 - Applicant's Response to East Suffolk Council's Local Impact Report

Applicants Ref	Theme	Key Paragraphs of LIR	Applicant's Response
LIR_ESC_01	Introduction	<p><i>ESC's Cabinet committee met on 7th May 2024 and approved the Council's overarching position on this project which is as follows:</i></p> <ol style="list-style-type: none"> <i>To support the position to not object to the North Falls project with a radial connection to Essex, providing the offshore turbines do not have a significant impact on the Essex and Suffolk Coast and Heaths National Landscape, but to also continue to support offshore coordination which reduces/minimises the extent of onshore infrastructure.</i> 	<p>The Applicant notes the position of no objection from East Suffolk Council subject to the offshore turbines not having a significant impact on the Suffolk and Essex Coast and Heaths National Landscape.</p> <p>Please refer to the Applicant's response to the Suffolk and Essex Coast and Heaths National Landscape Authority Relevant Representation [RR-316] as outlined within the Applicant's Response to Relevant Representations from Statutory Consultees and Non Prescribed Consultees [REP1-045] where it states the following:</p> <p>ES Chapter 29 Seascape, Landscape and Visual Impact Assessment (SLVIA) [APP-043] concludes in Table 29.1 that there will be no significant impacts on the special qualities of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (now defined at the Suffolk and Essex Coast and Heaths National Landscape) (SEHCNL). The ES chapter sets out the following reasoning:</p> <ul style="list-style-type: none"> • Taking a precautionary approach to the assessment, the scale of change on certain perceptual aspects of the SECHNL special qualities is judged to be medium, although other special qualities will be entirely unchanged.

Applicants Ref	Theme	Key Paragraphs of LIR	Applicant's Response
			<ul style="list-style-type: none"> • The geographical extent of the change will be small, limited to coastal areas within around 40km of the Offshore Above-sea Development, between Bawdsey Manor and Orford Ness. • This will affect a very localised area of the coastal edge, in the context of this large-scale • Effects will also be limited to days with clear weather. • For the vast majority of the SECHNL, which is largely beyond 40km from the Offshore Above-sea Development, and due to the increased distance and the reduced visibility from inland areas, the scale of change will be small or negligible. • On clear days, operational wind farms including East Anglia One, Greater Gabbard and Galloper will also be visible. The Offshore Above-sea Development will be seen in the context of these existing offshore wind farms. • The Offshore Above-sea Development will intensify the effects associated with existing offshore wind farm development that influence certain perceptual special qualities of the SECHNL. • The contribution of existing offshore turbines to the seascape horizon is acknowledged in the special qualities of the SECHNL, where it is acknowledged that they divide opinion.
LIR_ESC_02	Need for Offshore wind energy generation and project coordination	<p><i>“ESC is being consulted on and is aware of a number of energy related projects that may have an impact on our district, and we welcome and support collaborative working between all Applicants and the National Grid to ensure that the optimal solution is delivered. We expect this to involve coordination and the sharing of infrastructure where feasible to reduce the amount required onshore. This LIR is provided on the basis that the North Falls Offshore Wind Farm proposes an onshore grid connection located outside of Suffolk and beyond the East Suffolk Council District, however, should this change in future resulting in onshore infrastructure being proposed within our district, our position on this project may need to be revisited.”</i></p>	Noted.
LIR_ESC_03	Offshore connection options	<p><i>“ESC’s position at the time of writing our Relevant Representation [RR-084] assumed that this meant that any opportunity for an offshore connection between either the North Falls and Five Estuaries offshore wind farm projects, and a subsea cable project such as NGET’s SeaLink network reinforcement project linking Suffolk with Kent, had ceased in the absence of further Government funding. However, it is now understood that despite the Secretary of State deciding not to grant further funding, an offshore coordinated connection remains a connection option with North Falls’ DCO application in order to safeguard against the possibility of the current onshore connection option changing, and a viable offshore coordinated connection option being brought forward by an alternative party that still allows North Falls to be operational by 2030. Therefore, ‘Option 3: Offshore electrical connection, supplied by a third party’ remains on the table alongside onshore connection Options 1 and 2.”</i></p> <p><i>“ESC will therefore continue to monitor such a scenario closely in case either directly or indirectly this introduced a need for additional onshore transmission infrastructure within East Suffolk. Currently, the SeaLink project is proposing an onshore connection at Friston within the East Suffolk District, such a scenario requiring additional onshore infrastructure in East Suffolk in order to accommodate an offshore connection, would not have been supported by ESC.”</i></p>	<p>Noted, Section 3 of the Applicant’s updated Co-ordination Report [REP1-004] sets out the updated information in relation to the Offshore Transmission Network Review (OTNR) and Offshore Coordination Support Scheme (OCSS), which reflects the decision made by DESNZ in September 2024 to not grant further funding for the OCSS programme.</p> <p>The Applicant’s Common Response – 001 and 008 in the Applicant’s Response to Relevant Representations from members of the public [REP1-048] provides further context to the options considered in relation to offshore coordination.</p>

Applicants Ref	Theme	Key Paragraphs of LIR	Applicant's Response
LIR_ESC_04	Seascape and Landscape Visual Impact	<i>"In summary, ESC's initial seascape visual impact concerns have been significantly reduced following the removal of the northern array of wind turbines, together with the overall reduction in proposed maximum turbine heights to below 400m at a distance of approximately 42km offshore. It is also acknowledged that the current maximum blade tip height proposed by the Applicant has been reduced further to 377m above mean sea level. As explained in our Relevant Representation, we therefore do not consider that the statutory purposes for designation of the National Landscape are compromised to an extent that justify grounds for objection."</i>	Noted. This conclusion accords with the findings of the ES Chapter 29 SLVIA [APP-043] .
LIR_ESC_05	LBBG compensation within ESC	<p><i>"ESC continues to monitor the LBBG proposals within our district, noting that a lot of emphasis has been placed on the North Falls Applicant's discussions with Five Estuaries to collaborate on and deliver the compensation proposals as far as reasonably practicable. This is evidenced by the North Falls project excluding any LBBG habitat compensation land at Orford Ness from their onshore order limits submitted for the DCO application. Given the identified impacts on LBBG associated with the Alde-Ore designations (as with the Five Estuaries project), it is clear that significant emphasis has been placed on the Five Estuaries team to deliver their compensation alongside their own. ESC is flagging this to the ExA as we were surprised to see such confidence by North Falls in the delivery potential of such measures via a separate DCO Examination, which is currently ongoing. This must be fully explored by the ExA in order to provide confidence in the extent and deliverability of the necessary measures proposed, either via a project alone approach, or collaboratively.</i></p> <p><i>However, it must be stressed that ESC is not objecting to the proposed LBBG habitat compensation for the North Falls and Five Estuaries projects, in light of our overarching ecological position set out in our submitted Relevant Representation. We support both Applicants' ongoing engagement, working collaboratively and seeking to possibly provide a coordinated approach to LBBG compensation delivery. However, a cautious approach is warranted, with any possible cumulative impacts of a combined approach to LBBG habitat compensation being fully considered. ESC will therefore continue to proactively engage with the North Falls Applicant throughout the Examination period and throughout the lifespan of the Project as deemed necessary."</i></p>	<p>ESC's engagement on the LBBG compensation is welcomed and it is noted that ESC does not object to the proposed LBBG compensation.</p> <p>The approach taken by North Falls to not include compensation areas within the DCO order limits is the standard approach for offshore wind farms and does not indicate reliance on Five Estuaries. While it is noted that Five Estuaries includes LBBG compensation land at Orford Ness within their order limits, this approach is not typical for offshore wind farms, with the majority of consented offshore wind farms which require compensation, securing permits outside the DCO process. A recent example is the Sheringham Shoal and Dudgeon Extension Projects which concluded an AEOL on sandwich tern in their RIAA and did not include a compensation location within their order limits.</p> <p>North Falls is not reliant on Five Estuaries to develop compensation for LBBG because North Falls has identified and is also progressing alternative options for compensation sites. However, the Applicant has retained the Five Estuaries selected site within the shortlisted options for North Falls to facilitate potential collaboration, if appropriate. The North Falls site selection for LBBG compensation was discussed with ESC at the Offshore Ornithology ETG on the 15th January 2025 and is described in the Lesser Black-Backed Gull Compensation Document (clean and tracked) [REP1-017 and REP1-018].</p>

2.4 Applicant's Response to Suffolk County Council's Local Impact Report **[REP1-073]**

Table 2.4 - Applicant's Response to Suffolk County Council's Local Impact Report

Applicants Ref	Theme	Key Paragraphs of LIR	Applicant's Response
LIR_SCC_06a	Offshore ecology - bats	<p><i>OE01- 6.1 The Council notes that submissions were made to the Five Estuaries examination by other parties (such as the German Federal Maritime and Hydrographic Agency and Natural England) in relation to the potential impacts of offshore wind farms on the migratory bat the Nathusius' pipistrelle (Pipistrellus nathusii). It should be noted that national and local survey information indicates that this species is present in Suffolk and Norfolk and Essex.</i></p> <p><i>6.2 In addition, it appears that migratory bats and especially juveniles, are vulnerable to death from collision with, or proximity to, moving wind turbine blades. Proximity to</i></p>	<p>The Applicant notes that to date, no representation has been made to North Falls Examination from either the German Federal Maritime and Hydrographic Agency or Natural England on these matters.</p> <p>An assessment of the effects upon migratory Nathusius pipistrelle is included within Section 23.6.2.4 of ES Chapter 23 Onshore Ecology [APP-037], which reaches a conclusion of no significant effect upon the species. The Applicant is proposing that the mitigation proposed within the OLEMS [REP1-035] in terms of habitat enhancement to</p>

Applicants Ref	Theme	Key Paragraphs of LIR	Applicant's Response
		<p>wind turbines is known to result in death through barotrauma, which occurs because of exposure to the pressure changes located near the surface of moving wind turbine blades. Fast-moving wind turbine blades create regions of high- and low-pressure variations along the blade surfaces. If bats fly within these regions, the rapid change in pressure may cause internal bleeding, damage to lungs or other organs, and damage to the inner ear.</p> <p>As a migratory species, <i>Nathusius' pipistrelle</i> is protected by the Convention on the Conservation of Migratory Species, to which the UK is a signatory state. SCC recommends that advice is sought from NE on the SoS's obligations under these treaties in relation to <i>Nathusius' pipistrelle</i>. This would help the ExA and the SoS to understand the extent to which potential harm to these bats could engage an exception under paragraphs (3) and (4) of section 104 of the Planning Act 2008.</p> <p>These issues, impacts, and potential mitigation measures are set out in detail in Appendix 1 of the UK Government's Offshore Energy Strategic Environmental Assessment 4 ("OESEA4").</p>	<p>hedgerows, will lead to a beneficial effect on the available habitat resource for this species within Essex.</p>
LIR_SCC_06b	Offshore ecology - ornithology	<p>OE02 - The Council recognises in Environmental Statement ("ES") Chapter 13, Offshore Ornithology ([APP-027]) that an in combination impact of "moderate adverse" could result on LBBG populations during the operational phase. The ES chapter does not offer any mitigation for this impact within its summary table 13.59.</p>	<p>The Applicant has made significant mitigation commitments in relation to offshore ornithology, as discussed in Table 13.2 of ES Chapter 13, Offshore Ornithology ([APP-027]), including reducing the number of turbines and increasing the minimum air gap between rotors and the sea surface. As a result, the effect of North Falls alone is minor, with North Falls contributing only 1.2% of the cumulative annual collision mortalities.</p> <p>In addition, with regards to the Habitats Regulations Assessment, compensation is being developed for lesser black-backed gull from the Alde Ore Estuary SPA which will provide benefit to the overall population assessed in the EIA. Compensation is described in the Lesser Black-Backed Gull Compensation Document (clean and tracked) [REP1-017 and REP1-018] and the Outline Lesser Black-Backed Gull Compensation Implementation and Monitoring Plan (clean and tracked) [REP1-019 and REP1-020].</p>
LIR_SCC_07	Seascape, Landscape and visual amenity	<p>SL01 - During construction and operation, significant adverse effects on the local seascape character are expected to occur toward the end of completion, in the East Anglia Shipping Waters Marine Character Area (SCA04), Suffolk Coastal Waters (SCA10) arising from partially constructed turbines and platforms. During construction, significant adverse effects on visual receptors along the Suffolk coast (within the SCHAONB) are expected to occur toward the end of completion, for example Viewpoint 9 Shingle Street (Table 29.30) and Viewpoint 11 at Felixstowe (Table 29.32).</p> <p>SL02 - Potential for long-term reversible adverse effects on perceived seascape character which will be significant for several viewpoints within the SCHAONB [APP-043, Table 29.21]. SCC considers that there is potential for significant adverse effects on the perceptual qualities of the SCHAONB (see paragraphs 7.19 and 7.20 of this document), arising as a result of the operational wind turbine array and maintenance activities which may alter the seascape character of the array area itself and the perceived character of the wider seascape. This activity will be visible during good to excellent visibility conditions and may therefore affect the perceived character of the landscape and seascape.</p> <p>SL03 - Significant long-term reversible adverse effects on a 19km stretch of the Suffolk Coast Path between Aldeburgh and the Butley River have been found in the Applicant's Seascape, Landscape and Visual Impact Assessment ("SLVIA") [APP-043, Table 29.21].</p>	<p>SL01 – This is as noted in ES Chapter 29 SLVIA [APP-043]. Effects towards the latter stages of the construction phase will be similar in nature to operational effects. Operational effects are summarised in Table 29.42 of the ES Chapter 29.</p> <p>SL02 – Effects on offshore seascape character are assessed separately to effects on views experienced at viewpoints. Effects on the SCHAONB (now National Landscape) are described in Table 29.21 of ES Chapter 29 SLVIA [APP-043], with reference to effects on views. This assessment concludes that whilst the proposed development will alter aspects of certain special qualities, this will not result in significant effects on the overall designation. See Response Ref NE-42 in Applicant's response to Natural England's Relevant Representation [REP1-044] for further information.</p> <p>The Applicant will submit additional explanation for the assessment of effects on the special qualities of the SCHAONB at Deadline 3. See Applicant's Response to Natural England's Relevant Representation Appendix I2 SLVIA [REP1-044] for further information.</p> <p>The Applicant notes that the position set out in the LIR under SL02 differs from SCC's previous position in [RR-318] which states "SCC finds that there is not likely to be a significant effect on seascape and landscape or the Suffolk Coast and Heaths National Landscape Area."</p> <p>SL03 – This is as noted in ES Chapter 29 SLVIA [APP-043].</p> <p>SL04 - This is as noted in ES Chapter 29 SLVIA [APP-043], where cumulative effects are summarised in Table 29.39.</p>

Applicants Ref	Theme	Key Paragraphs of LIR	Applicant's Response
		<p><i>SL04 - Potential for significant total cumulative effects for the wider seascape, the landscape character of the coastal edge, and for visual receptors between Covehithe (VP1) to Aldeburgh (VP6).</i></p> <p><i>SL05 - The construction/decommission and operation of the East Anglia Connection Node ("EACN") On-shore substation, together with the substations of Five Estuaries and North Falls in Essex, may result in some adverse visual effects on visual receptors within the Dedham Vale National Landscape.</i></p>	<p>SL05 – Effects on Dedham Vale National Landscape are considered in the Chapter 30 LVIA [APP-044]. Due to the limited nature of visibility from Dedham Vale, towards the proposed development, no significant visual (including cumulative visual) effects are predicted. See Response Ref NE-42 in Applicant's response to Natural England's Relevant Representation [REP1-044] for further information.</p>
LIR_SCC_08	Highways	<p><i>HW01 - Potential negative impacts on Suffolk's local transport network and communities due to additional road traffic from construction activity and related abnormal indivisible load ("AIL"), heavy goods vehicle ("HGV"), and light goods vehicle ("LGV") and car movements in terms of severance, pedestrian delay, pedestrian amenity, fear and imitation, driver delay, accidents and safety, noise and air pollution.</i></p>	<p>The Applicant has provided a detailed response to this matter and SCC's relevant representation [RR-318] within the Applicant's Responses to Relevant Representations Received from Local Authorities and Parish Councils [REP1-046]. In summary, this response notes that the extent of the traffic and transport study area (TTSA) as it heads north toward Suffolk along the A12 is the responsibility of National Highways and that National Highways have agreed that the study area should extend to the junction of the A120 and A12.</p> <p>The relevant traffic and transport guidance are the Environmental Assessment of Traffic and Movement (EATM) published by the Institute of Environmental Management and Assessment (2023). To inform the extent of the TTSA, EATM calls for judgement informed by early stakeholder engagement. The Applicant has developed the TTSA in compliance with these guidelines giving due consideration to the likely effects (noting the concerns raised by Suffolk County Council relate to highway links (A12) that are within National Highways administration).</p> <p>Notwithstanding, the Applicant notes that Suffolk County Council wish to understand the volume of traffic that could head north via the A12. It can be noted from Table 27.16 of ES Chapter 27 Traffic and Transport [APP-041] that there would be a worst-case peak increase in traffic of up to 780 vehicles on the A120 which has a background traffic flow of approximately 45,000 vehicles per day. This equates to an increase of less than 2% in total traffic. Traffic flows on the A12 north of the A120 are in the region of 56,000 vehicles per day, as such it is evident that flows north toward Suffolk could be expected to increase by approximately 1% at peak. i.e. within day-to-day fluctuations and as such in accordance with EATM be deemed to lead to no discernible environmental impact and also not likely to result in cumulative impacts.</p> <p>A similar approach to defining the TTSA for cumulative projects in Suffolk (including East Anglia One North, East Anglia Two and Sizewell C) was adopted and accepted and their TTSA's do not interact with North Falls, indicating that traffic will have dispersed on to the network and there will be limited potential for cumulative impacts.</p>
		<p><i>HW02 - Potential negative effects of AIL movements. These effects include resourcing and capacity of SCC and the Suffolk Constabulary, suitability of routes both structurally and to minimise impacts on road users and the inadequacy of relying on the ESDAL system and notification timing requirements.</i></p>	<p>The Applicant has provided a detailed response to this matter and SCC's relevant representation [RR-318] within the Applicant's Responses to Relevant Representations Received from Local Authorities and Parish Councils [REP1-046]. In summary, this response identifies a preferred route for special order abnormal loads to move the Project's transformer from the nearest suitable port of Harwich (in Essex) and a potential route for shunt reactors and considers a route via A120 and A12 toward Colchester and onward toward the M25. Neither route would traverse Suffolk County Council's road network.</p> <p>The Applicant welcomes the additional clarification from Suffolk County Council in its LIR on this matter noting that:</p>

Applicants Ref	Theme	Key Paragraphs of LIR	Applicant's Response
			<p><i>"The process [ESDAL] allows hauliers to check the suitability of the route and get advanced notice of any problems. Typically, ESDAL notifications are made shortly before a planned move which has resulted in delays when weak structures are identified on the highway network. In SCC's opinion, the LHA should be engaged well in advance of any AIL movement to review data for structures it maintains, undertake any additional investigations required to provide up-to-date data or fill in gaps prior to an assessment of the structure for the specific load"</i></p> <p>In response, the Applicant would refer Suffolk County Council to the Applicant's Responses to Relevant Representations Received from Local Authorities and Parish Councils [REP1-046] (SCC-22 to SCC-24) which confirms that the routes for transformers and shunt reactors have already been checked and cleared. With regard to potentially smaller abnormal loads such as cable drums and items of plant, the clearance of these routes for significantly larger loads provides an envelope within which clearance for smaller loads can also be deemed to be acceptable. For example, cable drums traveling along the A120 from Harwich or the M25 direction would be acceptable. The Applicant notes that if abnormal loads were to be sourced from the A12 in the direction of Suffolk then additional checks would be required, however, the Applicant has demonstrated routes that can be used and considered it would not be proportionate to undertake further assessments at this stage.</p> <p>Notwithstanding, the Applicant is willing to discuss the inclusion of provisions within an update to the Outline Construction Traffic Management Plan, such that if by exception Suffolk ports were identified as a viable alternative the relevant highway authority would be consulted prior to the submission of the ESDAL notification to secure agreement.</p>
		<i>HW03 - Impact of construction and workforce traffic at ports within or adjacent to Suffolk</i>	The Applicant would note that it has no further comment upon this matter beyond the detailed response provided in the response to Q17.1.1 in Applicant's Response to Written Questions (ExQ1) (Document reference: 9.19) submitted into the Examination at Deadline 2.
LIR_SCC_09	Economic development and skills	<p>ED01 Potential for negligible additional spend from a non-home-based workforce. Table 4, paragraphs 9.17 and 9.18</p> <p><i>"The project could provide some benefit in terms of additional spend of non-home-based workers. However, without further evaluation this can only be assumed to have negligible impacts in Suffolk."</i> paragraph 9.17</p> <p><i>"The Applicant could work with the Councils on schemes/strategies encouraging non-home-based workers to spend locally. The Applicant could document its intention to assess these numbers as relevant to Suffolk in future iterations of the OSEP."</i> paragraph 9.18</p>	<p>Spending effects from non-local workers are not scoped into the socio-economic assessment of ES Chapter 31 Socio-economics [AS-010]. Non-local worker spend is not specifically included within the NPS EN-1 guidance set out in section 5.13, nor is it identified within guidance on assessing the socio-economic impacts of offshore wind farms (Glasson et al, 2021).</p> <p>However, the Applicant acknowledges the point made by Suffolk County Council that there could be local economic benefit from non-local worker spend. This would be generated during both construction and operation, albeit with operational spend likely to be significantly smaller in line with the number of workers required for the operational phase.</p> <p>The Applicant does not agree that this would be a neutral impact. The impact is likely to be negligible beneficial, as there would be expenditure from the non-local workforce on items such as food and accommodation, particularly in locations on and close to the onshore project where works are being completed, and the accommodation workers may be staying in. There would also be expected to be some non-local worker spending in close proximity to the operation and maintenance (O&M) base but this expenditure is likely to be negligible in the context of expenditure in the local study area (Suffolk and Essex).</p> <p>As set out in the Outline Skills and Employment Plan (OSEP) [APP-253], the Applicant will continue to engage with stakeholders on measures to maximise the employment and skills benefits of North Falls, both through the production of a Skills and Employment Plan post DCO consent and continued wider engagement with stakeholders. The Applicant would</p>

Applicants Ref	Theme	Key Paragraphs of LIR	Applicant's Response
			welcome the opportunity to discuss the specific employment and skills issues raised by Suffolk County Council further. As part of such discussions, ways to maximise the additional spend from a non-home-based workforce could be included as a discussion point for future consultation on the Skills and Employment Plan, which would be produced post DCO consent.
LIR_SCC_10	Economic development and skills	<p>ED02 Supply Chain and Economic Development. Table 4, paragraphs 9.19 and 9.20</p> <p><i>"The Applicant should work with their associated supply chains, contractors and local partners to recruit and train local people ahead of the construction period which will ensure that they develop their skills and are enabled to move between roles and different types of contracts as we see a range of energy infrastructure projects in the region. The project, as part of the wider energy infrastructure construction projects, is an opportunity to generate skills and employment outcomes and subsequently contribute to the achievement of both national and local policy objectives. The applicant must engage with Suffolk County Council's RSCF to ensure a co-ordinated skills development approach."</i> paragraph 9.19</p> <p><i>"The project could have some minor positive impacts on the local supply chain through investment in local businesses to support delivery of the installation of the project. However, given the relatively short construction period of the project, the benefits on the local supply chain is not expected to have a long-term impact unless consideration is given to the wider network projects and how local supply chain can support all of these. There are, in addition to North Falls, further projects requiring similar skillsets in planning that are expected to be constructed. Therefore, a developed, experienced local supply chain can expand to take advantage of these projects and be in a position to export their expertise to similar largescale project opportunities nationally. To maximise these opportunities, the Council expect the Applicant to work with local stakeholders to develop programmes that will support local businesses to grow and offer their services to supply the promoters project and other related projects within and outside the region."</i> paragraph 9.20</p>	<p>Employment impacts (direct and indirect) are assessed in the economic impact assessment (Environmental Statement Appendix 31.1 Socio-Economics Technical Baseline [APP-171]) for the Essex and Suffolk local impact area. Employment opportunities in the supply chain (including tier 1 suppliers) is included within the economic impact assessment. The assessment in ES Chapter 31 Socio-economics [AS-010] is based on a worst-case assessment scenario for an offshore connection scenario. Under this assessment employment impacts are assessed as negligible beneficial (i.e. not neutral).</p> <p>As set out in paragraphs 72 to 77 within ES Chapter 31 Socio-economics [AS-010] there are significant existing supply chain capabilities in Essex and Suffolk, which in turn offer the potential for local businesses to capture North Fall's supply chain expenditure. The economic impact assessment [APP-171] provides a more detailed assessment of the capabilities of the local impact area to capture expenditure.</p> <p>The OSEP [APP-253] discusses measures to maximise the employment benefit of North Falls. Suggestions already provided by local stakeholders including Suffolk County Council are useful and are noted for North Falls as part of the continuing process of employment and skills engagement and the development of relevant future plans and procurement approaches. It should be noted that supply chain opportunities are not just limited to the construction phase, as there are also indirect (supply chain) impacts through the operational phase of North Falls and this would be expected to present longer term opportunities for local businesses.</p>
LIR_SCC_11		<p>ED03 and ED04 Economic Development and Skills - Neutral impacts - Local employment and skills opportunities, Table 4 and paragraphs 9.21 to 9.26</p> <p><i>"SCC welcome the Applicant's production of an outline skills and employment plan. SCC believes that with a few changes to the OSEP, and through a continued collaborative approach, the project will prove socio-economically beneficial to Suffolk. SCC wishes to work with the Applicant to ensure that its activities in this domain are coordinated with others which are happening in Suffolk to maximise the possible benefits for the people of Suffolk."</i> paragraph 9.21</p> <p><i>"To achieve these positive impacts, including for those furthest from the workforce and vulnerable groups, the applicant would need to identify the different phased skills needs across their total workforce, and then the propensity and flexibility of the labour market within the study area to fill these identified roles. SCC would expect a tightening of the labour market due to other major energy projects, including Sizewell C, taking place in relative proximity at a similar time. In parallel, the Applicant would also need to identify local supply chain companies that can become involved in the project."</i> paragraph 9.22</p> <p><i>"The construction period for this project is predicted to occur during the middle of the construction period for Sizewell C Nuclear Power Station. It is anticipated that there would be significant cumulative pressure on the available workforce. This could</i></p>	<p>ED03, Table 4</p> <p>Suffolk County Council presents local employment opportunities as either a positive impact (opportunities with progression routes, well paid, skilled employment) or negative impact (only low pay, low skills, low progression employment or no employment offered locally). This does not reflect the likely mix of local employment opportunities that could generated, which would be expected to include a range of professions and occupations from higher managerial and professional roles to elementary and entry-level roles. It is not the expectation of the Applicant that only low pay, low skills and low progression employment will be offered locally. The Applicant views the local employment opportunities as a positive impact, assessed as the impact on employment in ES Chapter 31 Socio-economics [AS-010] as negligible beneficial effect. Salaries for many roles associated with offshore wind farm development would typically be above the Suffolk average salary. As noted in the OSEP [APP-253], the average salary for a full time construction worker in East of England is £38,600, nearly £4,000 higher than the all-sector average (£34,800) and there are a range of other roles required during the decommissioning construction and operation of the offshore wind farm. It is anticipated that the project would provide a mix of entry level, mid and advanced protection and experience gained on the project would provide skills such as project management, technical skills, collaboration and adaptability. The nature of employment opportunities is further addressed in the response to LIR paragraph 9.22</p>

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		<p><i>reduce the opportunities for securing any skills and employment legacy from the construction workforces as the projects would be occurring in parallel.”</i> paragraph 9.23</p> <p><i>“SCC expects the promoter to develop a demonstrable understanding of the wider development environment for their project, and to work with SCC and other promoters to manage and mitigate these impacts.”</i> paragraph 9.24</p> <p><i>“SCC also disagrees with the scoping out of projects from the cumulative assessment due to insufficient relevant data from the projects which prevents adequate assessment. Whilst this may be the case at present, SCC contends that it is possible that such data may become available in the future as these projects progress, so the Applicant should commit to including them in its assessment if relevant data becomes available. Due to the timescale of this project, it is highly likely that at least the operational and decommissioning phases will interact with some phase of these other projects, meaning that it cannot be ruled out that there will be no cumulative interaction between them. Additionally, the absence of evidence is not evidence of absence of impacts, so the notion that the lack of data entails the lack of impact is invalid. Projects scoped out due to a lack of available data include Sea Link and Lion Link. The Norwich to Tilbury Grid Reinforcement project is in a similar stage to these other projects yet is included in the cumulative impact assessment. Regarding Norwich to Tilbury, it should be noted that, despite being scoped into the cumulative effect assessment, the data has not yet been included in cumulative effects on employment [AS-010, table 31.53]. It is not clear whether the Applicant intends to update this data as information becomes available, but as things stand, its inclusion in the CEA has been insufficiently implemented.”</i> paragraph 9.25</p> <p><i>“The Applicant needs to work collaboratively with the RSCF and local stakeholders, share detailed skills and job information in advance and provide funding for interventions that will ensure a pipeline of local people can be trained and enter the labour market at the right time with the right skills to take up opportunities that the scheme will provide.”</i> paragraph 9.26</p>	<p>below. The Applicant notes the suggestions provided in relation to strategies and collaboration, such suggestions would be part of discussions through the further development of the Skills and Employment Plan and will help North Falls to maximise the beneficial local impacts of the project.</p> <p>The Applicant also notes that Suffolk County Council views the opportunities to support and enhance Suffolk's low carbon energy infrastructure skills and training, also leaving a legacy post construction as a positive impact. The Applicant will continue to engage with Suffolk County Council on the production of a Skills and Employment Plan which would be produced post DCO consent. This would include engagement with the regional skills coordination function (RSCF).</p> <p>Paragraph 9.21</p> <p>In response to LIR paragraph 9.21, Section 10 of the OSEP [APP-253] notes that further stakeholder engagement will be undertaken to refine the approach and consider how the Applicant can support the existing initiatives and ambitions of education, skills and supply chain organisations in the region. Most recently North Falls and Five Estuaries met with the Skills for Infrastructure Strategic Lead Suffolk County on the 14th of February 2025 as part of the continued engagement with stakeholders on the Skills and Employment Plan. As noted above, the Applicant will continue to collaborate with Suffolk County Council on the OSEP and will continue to seek input from key stakeholders such as Suffolk County Council in order to coordinate with others in Suffolk. Comments from Suffolk County Council, through the Examination, in relation to the OSEP have been noted and these will be captured to inform post DCO consent Skills and Employment Plan discussions.</p> <p>Paragraph 9.22</p> <p>The Applicant has identified the potential employment and skills opportunities for different phases in Table 6.1 of the OSEP [APP-253] and Section 6 provides an indication of the level of local employment. However, there is not yet enough information about the procurement of the construction process to undertake a full demand and supply workforce assessment of skills requirements. The Applicant would identify specific companies post DCO consent and may, for example, host meet the buyer supply chain events. More information would be provided in the Skills and Employment Plan, produced post DCO consent.</p> <p>Labour market capacity is outlined in Section 2.5 of the OSEP. The Applicant notes the expectation of a tightening labour market and further discussions of employment and skills will need to include this as a discussion point, to inform the development of employment and skills measures.</p> <p>Paragraph 9.23</p> <p>Suffolk County Council are correct to suggest that lack of local skills could result in a lower economic impact. This worst case local sourcing scenario has been assessed in the EIA. Overlapping construction phases with Sizewell C could be a contributing factor to such a worst case local sourcing scenario although it should be noted that the work being done by the Applicant in consultation with key stakeholders through skills and employment planning is seeking to maximise the economic benefits of the Project.</p> <p>Paragraph 9.24</p> <p>The Applicant has undertaken a detailed baseline assessment, which included the wider development environment. The Applicant will continue to engage with Suffolk County Council and other promoters through the development of the Skills and Employment Plan.</p>

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			<p>Paragraph 9.25</p> <p>The Applicant notes that Norwich to Tilbury was included in the cumulative effects assessment, but without the detailed information required to conduct a comprehensive assessment in relation to socio-economics, tourism and recreation effects. The decision to scope out other projects such as Sea Link and Lion Link was the result of the lack of available data to conduct any meaningful assessment. The decision was also informed by the relative location of the projects and potential overlapping impacts of the projects in comparison Norwich to Tilbury.</p> <p>Paragraph 9.26</p> <p>The Applicant most recently met with Suffolk County Council to engage on employment and skills matters on the 14th of February 2025. The Applicant will continue to work collaboratively with Suffolk County Council and other local stakeholders. The Applicant will work collaboratively with RSCF through future engagement on the Skills and Employment Plan, which will be produced post DCO consent.</p>
LIR_SCC_12		<p>9. Economic Development and Skills – Negative impacts – Workforce displacement and churn (ED05) Table 4 and paragraphs 9.27 to 9.32</p> <p><i>“SCC considers there is a likely negative impact on workforce availability to regional businesses due to workforce displacement and churn. Within the region, there are numerous energy infrastructure projects planned and expected to be in construction around the same period as the Applicant’s development. These projects would likely require some of the skills and workforce needed for the construction of this project. To mitigate this impact, the Applicant should include provision in the OSEP to work collaboratively with SCC and the RSCF to ensure a strategic approach in order to help control the rate of workforce displacement. Labour required should also include members of the local workforce who might not have the necessary skills without some investment in training locally.” [Paragraph 9.27]</i></p> <p><i>“Labour market churn occurs as workers move between jobs. While the Council welcomes, in principle, opportunities for individuals to access jobs with better pay and enhanced career paths, in this case the Council considers that labour market churn will have a damaging negative impact on the local economy. Given the relatively short construction period of this proposal, any employment churn, where skilled labour prematurely leaves their current local employment to work on the project, will have a damaging negative impact on the local economy.” paragraph 9.28</i></p> <p><i>“SCC acknowledges the Applicant’s response to its PEIR Consultation Response Letter [AS-010, table 31.1], in which the Applicant states that there is no action required on the issue of labour market churn since the Applicant’s assessment has found no likely significant effects for socio-economic issues. However, several issues of concern, such as workforce displacement and labour market churn, have not been assessed, meaning that the Applicant’s assessment does not demonstrate that these impacts will be non- significant and negligible.” paragraph 9.29</i></p> <p><i>SCC is concerned that there is the potential for cumulative pressures on the local labour force, leading to workforce displacement and a distorted labour market that will adversely impact local businesses. Significant displacement caused by the cumulative pressures of many infrastructure projects, in particular EA1N and EA2, Bramford to Twinstead, Norwich to Tilbury, Sea Link, Lion Link, , Five Estuaries and North Falls together with the Sizewell C nuclear power station, building and operating in the same timeframe will likely lead to wage inflation and potentially reduce the</i></p>	<p>Suffolk County Council’s assessment is that the impacts on local businesses and on the supply chain of other infrastructure projects in the local area and region due to workforce displacement and churn would be considered a negative impact. Churn is part of a functioning labour market and a characteristic of the construction sector which has to be responsive to the timing and flow of projects and contracts. The suggestion of additional displacement implies that a loss of business would occur in other parts of the study area economy as result of the Project and its in-combination effects. The Applicant does not accept that this is an inevitable outcome, and the development of a Skills and Employment Plan is intended to ensure that measures will be put in place to capitalise on the business opportunities the projects present, and to provide the capacity of the study area’s economy to respond to these opportunities.</p> <p>The various other projects being construction in the broader region can also be seen as an opportunity for long term employment in the construction sector, which as noted in the response above has an average wage level which is higher than the Suffolk average. Whilst construction projects are time-limited rather than permanent, it is reasonable to anticipate that the construction of North Falls, together with other infrastructure projects, could contribute to supporting long term career development opportunities and the growth of the construction sector, and so it cannot necessarily be considered as a negative impact.</p> <p>As noted above, the Applicant most recently met with Suffolk County Council to engage on employment and skills matters on the 14th of February 2025. The Applicant will continue to collaborate with Suffolk County Council on employment and skills matters, particularly where they address concerns Suffolk County Council may have in relation to workforce displacement and churn. The SPD guidance produced and highlighted by Suffolk County Council was not published at the time the assessment was undertaken. The Applicant will consider this guidance on a skills and workforce framework as part of the review of information undertaken for the Skills and Employment Plan.</p> <p>It should also be noted that the scale of the effect on local employment (in the context of the Suffolk and Essex economy) is predicted to be minor beneficial. In addition, given that the onshore infrastructure is located in Essex, the primary focus of employment impacts during the construction phase is more likely to be on Essex than Suffolk.</p>

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		<p>availability of local workers, necessitating in the need for non-home-based workers traveling into the area. SCC is concerned that the Applicant has not included this issue in its assessment of the socio-economic cumulative impacts of this project together with nearby NSIPs [AS-010, table 31.53]. paragraph 9.30</p> <p><i>“The Applicant also recognises the possible benefits from the opportunities to co-ordinate with Five Estuaries in the OSEP [APP-253, section 1.2], though SCC believes that there are opportunities for collaboration with other NSIPs in proximity to the proposed development. Whilst SCC appreciates the mention and consideration of effects on the labour market of several NSIPs in Suffolk, it is not clear to what extent the Applicant intends to collaborate and coordinate activities with these projects and update its strategy according to relevant new information. The Applicant should also ensure that the list of relevant major infrastructure projects [APP-253, section 2.4] is exhaustive. Currently, the EA1N and EA2 offshore windfarms and the Lion Link interconnector are excluded despite their proximity both spatially, temporally and in terms of their similarity in worker-demand to the proposed development. The combination of these points mean that SCC is currently unclear on whether the Applicant will adequately maximise benefits, and mitigate negative impacts, when it comes to skills and employment. It is also important to note that projects like Sizewell C will have construction phases which significantly overlap with the North Falls project’s operation phase, so inter-phase interaction should be considered in the cumulative assessment.”</i> paragraph 9.31</p> <p><i>“SCC expects the negative impacts of labour market churn to be especially pronounced during the transition from the construction to the operational phases of the project due to the significant shift in the number of workers required by the project as it moves into its operational phase. SCC expects the Applicant to mitigate this impact during this transitional phase by facilitating further opportunities for their workforce. This can be achieved in a variety of ways which will be discussed with the Applicant during consultation regarding the drafting of the SEP. Such methods may include assisting workers in gaining employment in other nearby green energy NSIPs which require similar roles/skills, or finding employment in related, non-NSIP roles/industries. SCC also expects the Applicant to remain engaged with and work alongside the RSCF delivered by SCC during all phases of operations.”</i> [Paragraph 9.32]</p>	
LIR_SCC_13		<p>9. Economic Development and Skills – Negative impacts Tourism (ED06), Table 4 and paragraph 9.33</p> <p><i>“SCC anticipates that the project, given its location close to the Suffolk Coast & Heaths National Landscape and Dedham Vale National Landscape Area and other rural areas of Suffolk of importance to the tourism economy, could have impacts upon visitor perception, and visitor numbers. In combination with other projects happening simultaneously in the area, the impact could be significant. Moreover, negative impacts on tourism and visitor numbers will likely be greater during the operational phase of the project due to the longer timescale.”</i> [Paragraph 9.33]</p>	<p>Suffolk County Council highlights the relevance of NPS EN-1 paragraph 5.13.4 which states that the Applicant’s assessment should consider all relevant socio-economic impacts, which may include effects (positive and negative) on tourism and other users of the area impacted. NPS EN-1 paragraph 5.13.9, in the context of Secretary of State decision making, notes that the Secretary of State should have regard to the potential socio-economic impacts of new energy infrastructure identified by the Applicant.</p> <p>It should be noted that paragraph 5.13.10 sets out that the Secretary of State may conclude that limited weight is to be given to assertions of socio-economic impacts that are not supported by evidence (particularly in view of the need for energy infrastructure as set out in the NPS). The Applicant has drawn upon the most relevant available evidence in conducting its assessment of potential effects of the Project on tourism in ES Chapter 32 Tourism and Recreation [APP-046], whilst there appears to be no evidence to support Suffolk County Council’s claim that “wind turbines in the sea scape detract from the environmental quality for recreation activity more broadly and the perception and propensity of people who visit the area”.</p>



NORTH FALLS

Offshore Wind Farm



HARNESSING THE POWER OF NORTH SEA WIND

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