NORTH FALLS

Applicant’s comments on Written Representations

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1. INTRODUCTION

1.1 Introduction

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 The Examining Authority's Rule 8 letter **[PD-008]** confirmed that Deadline 2 for the Examination was Tuesday 4 March 2025 and for this deadline Written Representations (WRs) were to be submitted.

1.1.3 This document has been prepared by the Applicant for submission at Deadline 3 on Tuesday 18 March 2025, and responds to Written Representations (WRs) submitted at Deadline 2.

1.2 Purpose of the document

1.2.1 This document provides comments, where appropriate and relevant, on the Written Representations submitted at Deadline 2 by Interested Parties. It does not copy all text from each Written Representation in order to avoid an overly lengthy document, where the relevant paragraph has been included this is referenced in the format **[Paragraph X.X]**.

1.2.2 The Applicant notes that this document will require an update at a subsequent deadline in the Examination, where a response to a specific matter raised by an Interested Party has been deferred by the Applicant. The Applicant has sought to limit deferring matters as far as reasonably practicable.

2. WRITTEN REPRESENTATIONS WHERE THE APPLICANT HAS NO COMMENTS

2.1 Written Representations where the Applicant has no comment

PINS Ref	Party	Title of document	Applicant's Response
REP2-031	Defence Infrastructure Organisation/Ministry of Defence	Written representations (WR), including summaries of any WR exceeding 1500 words	No comments.

3. APPLICANT'S COMMENTS ON WRITTEN REPRESENTATIONS

3.1 Applicant's Response to Glynis Roberston Late D1 Submission [REP1-084]

Applicants Ref	Section of WR	Key Paragraphs from WR	Applicant's Response
REP1-084_a	Alternatives and Cumulative Impacts	As requested by the Examining Authority at the Preliminary Meeting, I summarise below the two areas which are of particular concern to me and which the ExA may wish to pursue further The Alternatives and Cumulative Impact	Noted.
REP1-084_b	1. The Alternative Lack of appraisal of an Offshore Grid	I believe the failure of the Offshore Coordination Support Scheme (OCSS) is a huge step backwards for the UK and a shocking affirmation that National Grid (NG) do not have the UK's best interests at heart. The lack of transparency around the OCSS's choice of Sea Link and National Grid's Sea Link findings has led many to think it was an exercise to appease communities call for an Offshore Grid and say, 'look we are doing something'. It is public knowledge that National Grid's connection system is oversubscribed and not fit for purpose. Instead of using outdated methods of radial connections to the Grid and imposing unnecessary onshore infrastructure there should be two grids: the existing and further upgraded grid for onshore energy production and a second for offshore wind power using the North Seas as a corridor to pool wind energy to brownfield sites closer to demand/urban centres. Had National Grid gone down the Modular Offshore Grid (MOG) route in 2021 as Belgium's TO Elia had already done. and when campaign group Suffolk Energy Action Solutions (SEAS) proposed that offshore wind farms North Falls/Five Estuaries and EAN1/EA2 should be pilots 1 connecting to LionLink and Nautilus Interconnectors respectively to create the bases of a UK MOG, there would not be this vast and growing opposition from East Anglia and other regional consumers against the unnecessary destruction and industrialisation of our countryside – we would, by now, be well on the	The Applicant co-ordinated a consortium including Five Estuaries offshore windfarm and National Grid's SeaLink project to establish the feasibility of an offshore connection. SeaLink was identified due to its near term programme of delivery, combined with the regulatory governance being wholly controlled within the UK jurisdiction and its associated bodies. Co-ordination with transmission projects connecting from the UK to EU states would require more complex regulatory and commercial models which are likely to take more time to develop and implement. The **Applicant's Common Response – 001** within the Applicant's Response to Relevant Representations Received from Members of the Public [**REP1-048**]. responds to the points raised in relation to connecting to other offshore electricity interconnectors including LionLink and Nautilus. The Applicant, Five Estuaries and SeaLink collaborated and fully participated in DESNZ's OCSS. In September 2024, the Secretary of State confirmed the OCSS would not receive further or additional funding. This brought the consortium to a close. Further background to the decision by DESNZ is explained in Section 3 of the Co-ordination Report [**REP1-004**]. The Applicant makes no comment on the concerns raised that appear to relate to National Grid's commercial matters and its business operations.

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		way to Net Zero 2030. Please see Annex A, my original Relevant Representation below, which lays out SEAS proposed Pilot Schemes. It is debatable that Sea Link meets the OCSS criteria. National Grid is not a Developer but a Transmission Owner and should never have qualified for the OCSS. Using Sea Link (a boot strap from Suffolk to Kent) would negate Sea Link's 'needs case' as a 2GW transmission line. It would lose up to 1GW of capacity to energy producers North Falls and Five Estuaries and instead be acting as a Multi-Purpose Interconnector (MPI). Even so, National Grid decided to present their scenario to the Offshore Coordination Support Scheme (OCSS) thereby to my mind utilising National Grid's monopoly and pushing out other competitors such as Nautilus or LionLink Interconnectors, MPI's suited for the purpose of the OCSS.	
REP1-084_c	2. Cumulative Impact	To our detriment in Suffolk Coastal we are finding National Grid's continued and out-dated use of point-to-point radial connections is proving very destructive and we continue to believe that Offshore options are more environmentally friendly and more sustainable. In 2020 our community went through 9 months of gruelling examinations for two DCO's - Scottish Power's East Anglia One North and East Anglia Two. At that time there were a number of other energy projects which had not yet been listed on the PINS website and were therefore not allowed to be considered in the Cumulative Impact deliberations. These were Nautilus, LionLink (ex Eurolink) and Sea Link. Along with EA1N & EA2, a new National Grid Substation and Sizewell C twin nuclear reactor, this totalled 6 NSIP projects in 5 square miles. These exclusions led to an extremely unfair and ill-informed DCO whereby the Inspectors, in many people's eyes, could not perform their job properly. In their report to the Secretary of State, they did however allude to the fact that should any further energy projects come forth that great care should be taken due to the fragility of the Suffolk Coast environment. This caveat has been largely ignored. Apart from Nautilus all the aforementioned projects are either consented to or in the pre-examination period, making Suffolk Coastal into a Super Energy Hub by stealth and deceit.	Responsibility for transmission and electricity distribution sits with National Grid ESO. The Applicant was initially provided a National Grid contract to connect into Friston Suffolk, yet subsequently the Connections Infrastructure Options Note (CION) process was re-opened resulting in the Applicant's point of grid connection changing to the East Anglia Connection Node (EACN).
REP1-084_d		With this in mind, I urge the Panel to take time to seriously consider the Cumulative Impact and whether the loss of prized natural and protected landscapes, loss of A grade agricultural land, loss of a tourist economy and loss of the health and mental wellbeing of many local communities are worth it when there is a practical alternative in a Modular Offshore Grid.	The cumulative effect on protected landscapes for all phases of the Project has been assessed in ES Chapter 30 Landscape and Visual Impact Assessment [**APP-044**] and ES Chapter 29 Seascape, Landscape, and Visual Impact Assessment [**APP-043**]. The Applicant's position in respect of potential impacts on arable land is set out in the **Applicant's Common Response – 006** within the Applicant's Response to Relevant Representations Received from Members of the Public **[REP1-048]**). Potential cumulative effects are discussed in ES Chapter 22 Land Use and Agriculture [**APP-037**]. Potential cumulative effects on tourism and recreation of both the construction and operational phases are assessed in ES Chapter 32 Tourism and Recreation **[APP-046]**. The Applicant has taken account of the potential health effects which could arise from the construction of the Project and has undertaken an assessment of effects on health (including cumulative effects) as part of ES Chapter 28 Human Health **[APP-042]**.

3.2 Applicant's Response to Historic England – Written Representation [REP2-039]

Applicants Ref	Section of WR	Key Paragraphs from WR	Applicant's Response
REP2-039_a	Comments on Environmental Statement: Volume 3.1, Chapter 16 – Marine archaeology	It is our understanding from available information that HMS E6, a Royal Navy submarine, sunk in 1915 with no survivors and designated under the Protection of Military Remains Act 1986, is located within the proposed electricity export cables' corridor. We are therefore concerned with the spatial proximity of any proposed development (North Falls or Five Estuaries), given that HMS E6 is included within Table 16.16 (Known wrecks and unidentified A1 anomalies within the study area) Written Representation: Historic England Page 9 and therefore its 'protected place' status should have been identified as such in Section 16.5.2 (Maritime and aviation archaeology). **[Paragraph 4.3]** Section 16.6 (Assessment of significance) outlines the impacts that have been scoped in for construction, operation and maintenance and decommissioning phases. We are pleased to see that the same impacts set out at the PEIR are still included. However, we note that no amendment has been made to the second part of Impact 3 (sub-section 16.6.1.3 Indirect impact to heritage assets from changes to physical processes). This states that indirect impacts arising from seabed preparation and installation of foundations and cables would have a positive effect. There is no consideration of the negative impacts. We acknowledge that there is potential for sediment mobilisation to have positive effects, but this is by no means guaranteed. **[Paragraph 4.5]** Regarding the identification of impacts for the project area, the application of embedded mitigation in all instance's states that "significance of effect has therefore been assessed as minor to negligible and the effect is consequently considered not significant in EIA terms." This is an assumption predicated on mitigation by avoidance, which can only be delivered if adequate archaeological evaluation is completed prior to construction. At present we consider insufficient evaluation has been undertaken to address this point and a programme of further works will be required. Furthermore, it is unlikely that this project would be able to avoid sedimentary sequences of geoarchaeological interest and it should be acknowledged that subsequent access for study will be permanently compromised. The potential magnitude of impact is therefore significant in EIA terms. For example, Section 16.8.3 (Assessment of cumulative effects) acknowledges that "…palaeogeographic features within the offshore export cable corridor for the Five Estuaries, which runs parallel and partially overlaps with the North Falls offshore cable corridor…" It is therefore possible that cumulative effects could occur through multiple unavoidable impacts upon the same features of archaeological importance. **[Paragraph 4.6]** We note from Table 16.4 (NPS assessment requirement) that no offshore geotechnical surveys have been undertaken for this ES and all	As informed in response to HE's Relevant Representations [RR-130], in Section 2.2 of Applicant's Responses to Relevant Representations Received from Statutory Consultees and Non Prescribed Consultees (Document Reference 9.2, **[REP1-044]**), it is acknowledged that HMS E6 is a protected place under the Protection of Military Remains Act 1986. This was not reported in ES Chapter 16 Offshore and Intertidal Archaeology and Cultural Heritage [**APP-030**] nor in ES Appendix 16.1 Archaeological Assessment of Geophysical Data [**APP-109**] in error and has been corrected at Deadline 1. The location of HMS E6 is known and will be avoided through the application of an Archaeological Exclusion Zone (AEZ). In accordance with the Protection of Military Remains Act 1986 no activities will take place at the location (or within the AEZ), the site will remain undisturbed, and nothing will be removed from the site. To this end, amendments to the recommended AEZs to be implemented at the location, to ensure full avoidance of the wreck, and any potentially associated debris, have been agreed in consultation with the Ministry of Defence, as the competent authority for all responsibilities under the 1986 Act. These amendments were reflected in the updated Outline Offshore Written Scheme of Investigation (WSI), submitted at Deadline 1 **[REP1-031]**. **[Paragraph 4.3]** The assessment of likely significant effects during construction in ES Chapter 8 Marine Geology, Oceanography and Physical Processes **[APP-022]** demonstrates that no single impact would be greater than a negligible effect (no discernible change in receptor condition). The following impacts from ES Chapter 8 were carried through for consideration in sub-section 16.6.1.3 and the potential indirect impacts on heritage assets from changes in marine physical processes for the following impacts were assessed: • Impact 2a: Changes in seabed level due to seabed preparation for installation of turbine and OSP/OCP foundations • Impact 2b: Changes in seabed level due to drill arisings for installation of piled foundations for wind turbines and OSP/OCPs • Impact 4: Changes in seabed level due to offshore export cable installation • Impact 6: Changes in seabed level due to offshore array and platform interconnector cable installation (including any deposition arising from Impact 7, sandwave levelling) These are all effects which have the potential for beneficial indirect impacts on heritage assets (i.e. increased bed-level and consequent increased potential for the protection of heritage assets which are currently exposed through additional sediment cover from the sediment deposited from a plume). Given the low / negligible changes in bed level, associated with the above impacts, and that changes will be short term and limited in extent (i.e. in vicinity of installed infrastructure), it is concluded that there is no pathway for change to the fabric of any heritage asset as an indirect result of this effect.

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		geotechnical work will be delivered post consent (subject to permission). It is important to highlight that this approach is at the applicant's own risk and the essential requirement for the geoarchaeological analysis of any geotechnical survey data collected post-consent (should authorisation be obtained) and completed prior to the commencement of construction activities. **[Paragraph 4.7]** We consider the detail of the Outline Offshore Written Scheme of Investigation (WSI) (PINs Examination Ref: APP-246) prepared for this project is crucial to demonstrate that this work will be undertaken to appropriate standards prior to any impacts occurring because of construction activities. Chapter 16, sub-section 16.6.1.2.3, paragraph 205, presents the specific objectives for targeted geotechnical samples and geoarchaeological assessment. These seem appropriate, but it is our advice that the dating of these sediments is carefully considered. Some of the sampled deposits may be exceed the upper limit of radiocarbon dating (c.50,000 years) and so alternative techniques may be needed. **[Paragraph 4.8]** It is also stated in sub-section 16.6.1.2.3 that specialist archaeological input will be incorporated into the planning and implementation of any additional works, in particular sampling programmes for geotechnical material. However, we it is our advice that a geoarchaeologist is allowed direct access to any cores recovered, as it is better to record and assess continuous core sequences rather than isolated deposits as this provides greater confidence in the resulting conclusions. We recommend that this action is formalised as part of the revision programme for the Outline Offshore WSI document post-consent (should to authorisation) and the DCO includes a separate condition for geotechnical sample collection and geoarchaeological assessment of the samples. We are not satisfied that in consideration of the geoarchaeological potential within the proposed development areas, that capacity should be allowed for dedicated cores to be obtained as distinct from "…geotechnical logs acquired as part of engineering-led ground investigation works…" Effective geoarchaeological assessment requires cores to be obtained at locations that best answer North Sea Prehistory Research and Management Framework questions (as used in Table 1.11 in the Outline Offshore WSI, which we accept should be obtained during any post-application/post-consent stages of the proposed project. **[Paragraph 4.9]** We note a mitigation strategy has been developed in Table 16.27 (Summary of potential impacts on offshore archaeology and cultural heritage) and includes the requirements for a Written Scheme of Investigation (WSI), Archaeological Exclusion Zones (AEZs), Protocols for Archaeological Discoveries (PADs), and further archaeological assessments. We advise that all these mitigation measures are included as conditions within the draft Deemed Marine Licences submitted with this DCO application. **[Paragraph 4.12]**	The following impacts are also assessed in ES Chapter 8 Marine Geology, Oceanography and Physical Processes **[APP-022]** which are not explicitly addressed in sub-section 16.6.1.3: • Impact 7: Interruptions to bedload sediment transport due to sandwave levelling for offshore export cable, array cable and platform interconnector cable installation • Impact 8: Indentations on the seabed It is acknowledged that both sandwave levelling and activities, such as UXO clearance or vessel anchoring/jack-up, which leave indentations on the seabed have the potential to result in negative effects associated with the exposure of buried archaeological material to marine processes due to loss of sediment cover. However, the potential for adverse indirect effects on heritage assets to occur are limited in spatial extent to the footprint of these activities. For Impact 7, ES Chapter 8 Marine Geology, Oceanography and Physical Processes **[APP-022]** concludes that given the local favourable conditions that enable sandwave development, the sediment would be naturally transported back into the levelled area within a short period of time. Any change would be of low magnitude (near-field only) and short term. Similarly, for Impact 8, ES Chapter 8 Marine Geology, Oceanography and Physical Processes **[APP-022]** determines that any effects on marine physical processes from indentations would not extend beyond the direct footprint. These activities (seabed preparation and vessel anchoring/jack ups) are assessed as direct impacts in ES Chapter 16 Offshore and Intertidal Archaeology and Cultural Heritage **[APP-030]** (Sections 16.1.1 and 16.1.3) (i.e. damage to, or destruction of, archaeological material or the relationships between that material and the wider environment (stratigraphic context or setting)). As such, any impacts to heritage assets within these footprints will already have been addressed through consideration of the direct (physical) impacts associated with construction. It is acknowledged that this is not explicitly stated in sub-section 16.6.1.3. However, as ES Chapter 8 Marine Geology, Oceanography and Physical Processes **[APP-022]** concludes that no single impact would be greater than a negligible effect (no discernible change in receptor condition), it is similarly concluded for potential negative effects, as well as potential beneficial effects, that there would be no pathway for change to the fabric of any heritage asset as an indirect result. **[Paragraph 4.5]** A commitment to the requested programme of further works is established through the Outline Offshore WSI (which has been revised and submitted at Deadline 3) (Document Reference: 7.11, Rev 2). **[Paragraph 4.6]** A commitment to marine geoarchaeological investigations is established through Section 1.5.2 of the Outline Offshore WSI (which has been revised and submitted at Deadline 3) (Document Reference: 7.11, Rev 2). However, the Applicant cannot commit to the completion of all geoarchaeological work prior to the commencement of construction activities. The Applicant is committed to a staged programme of assessment, analysis and, if warranted, publication as a final stage. As the timescales for publication cannot be predicted, it is not possible to confirm that this final stage would be completed prior to construction.

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		Monitoring requirements for the historic environment are mentioned within the In Principle Monitoring Plan (Document Ref 7.10; PINs Examination Ref: APP-245), but only in reference to identification and monitoring of AEZs. All such monitoring should therefore be proportional to the significance of heritage assets potentially impacted. We recommend that sufficient explanatory information should be included to explain the provision for archaeological monitoring within the Offshore In-Principle Monitoring Plan, as detailed within the Outline Offshore WSI (Section 1.7-Requirements for monitoring). **[Paragraph 4.13]**	DCO Schedule 8 condition 21(2)(h) and DCO Schedule 9 condition 22(2)(h) require a timetable for all further site investigations, which must allow sufficient opportunity to establish a full understanding of the historic environment within the offshore Order limits, and the approval of any necessary mitigation required as a result of the further site investigations prior to commencement of licensed activities. As such, the Applicant is committed to the delivery of geoarchaeological assessment and analysis as necessary to establish both a full understanding of the historic environment and to the approval of any necessary mitigation prior to construction. Section 1.9.1 of the Outline Offshore WSI (which has been revised and submitted at Deadline 3) (Document Reference: 7.11, Rev 2) addresses the requirements for method statements which will include a timetable for investigation and post-investigation actions to be agreed in consultation with Historic England. The Applicant can agree, therefore, that any post-investigation actions which remain outstanding prior to construction would be in accordance to a timetable to be agreed with Historic England at that time. **[Paragraph 4.7]** The approach set out in the Outline Offshore WSI (which has been revised and submitted at Deadline 3) (Document Reference: 7.11, Rev 2) requires that, prior to the commencement of any site investigation campaign, a method statement will be prepared by the retained archaeologist setting out the specific details of the campaign to inform consultation with the archaeological curators regarding the scope and proposed locations of geotechnical work. This would include any specific requirements for individual samples, such as additional measures to ensure samples required for Optically Stimulated Luminescence (OSL) dating, for example, are not exposed to light during collection, storage or recording. The archaeological curators will also be consulted on subsequent geoarchaeological assessments commissioned by the project team which will ensure that the most appropriate techniques of analysis are applied to the acquired samples. **[Paragraph 4.8]** Paragraph 83 of the Outline Offshore WSI (which has been revised and submitted at Deadline 3) (Document Reference: 7.11, Rev 2) states that provision will be made for archaeology specific boreholes to be acquired where deposits of archaeological or palaeoenvironmental potential have been identified. Paragraph 86 of the Outline Offshore WSI (which has been revised and submitted at Deadline 3) (Document Reference: 7.11, Rev 2) states that geotechnical cores, or a representative sample of cores agreed with the archaeological contractor, will be retained undisturbed until a selection of cores for archaeological recording has been made. If the cores cannot be retained then further steps should be taken, such as having an archaeologist present during sampling operations. **[Paragraph 4.9]** DCO Schedule 8 condition 21 (2) and DCO Schedule 9 condition 22 (2) require a 'marine written scheme of archaeological investigation', in accordance with the outline offshore WSI, which must include: • a method statement for further site investigation including any specifications for geophysical, geotechnical and diver or remotely operated vehicle investigations; • archaeological analysis of survey data; • delivery of any mitigation including, where necessary, identification and modification of AEZs; and

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			• a reporting and recording protocol, designed in reference to the Offshore Renewables Protocol for Reporting Archaeological Discoveries. **[Paragraph 4.12]** The Offshore In-Principle Monitoring Plan (Document Reference 7.10; [APP-245]) refers to the Offshore WSI for the details of the offshore archaeology monitoring, as the appropriate document for the provision of this information. **[Paragraph 4.13]**
REP2-039_b	Comments on Environmental Statement: Volume 3.1, Chapter 25 – Onshore Archaeology and Cultural Heritage	Section 25.4.2.1 – It is noted that a route wide geophysical survey has been carried out as part of the evaluation work, as well as trial trench evaluation excavations at the onshore substation works area. The results of the geophysical survey have therefore not been ground-truthed or assessed in terms of their significance for most of the area of the proposed scheme. It is therefore possible that the archaeological potential of the proposed scheme area may not be well understood, and that previously unknown remains may be present within the proposed scheme area. **[Paragraph 5.1]** 25.4.3.1 (paragraph 48) states that the outstanding geophysical work and evaluation trial trenching will be carried out post-consent. Questions would need to be asked about whether the potential impact of the proposed scheme can be understood with additional evaluation works pre-consent. **[Paragraph 5.3]** 25.4.6 (paragraph 78) states that no transboundary effects are anticipated because of the North Falls development. Does this statement consider the potential for the development to alter the local water environment, which may be felt outside of the red-line boundary of the scheme? **[Paragraph 5.4]** 25.5.3 (paragraph 93) states that 240 non-designated heritage assets have been identified within the study area, but it is important to note that they represent the heritage assets known to be present. There is the potential for previously unknown remains to also be present within the proposed development area. **[Paragraph 5.5]** 25.5.3 (paragraph 95) states that the heritage assets at risk of direct physical impacts are confined to the onshore project area. It should be noted that changes to the local water environment is classed as a direct impact. These sorts of effects can alter the conditions of nearby archaeological sites and may be felt outside of the red-line boundary. **[Paragraph 5.6]**	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 Project 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]**. **[Paragraph 5.1]** The Applicant is in discussion with Historic England and Essex County Council (Places Services) (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. The Applicant is following the approach discussed with Five Estuaries and is in the process of drafting an Archaeological Mitigation Strategy (AMS) and Trial Trench Plan and updating the Outline Onshore WSI **[APP-247]** to be submitted into the Examination at Deadline 5. **[Paragraph 5.3]** Transboundary effects consider potential for effects to occur within the Exclusive Economic Zone (EEZ) of other European Economic Area (EEA) member states or other interests of EEA member states. As the onshore project area does not cross over into other EEA member states, no transboundary effects are anticipated. Assessment of effects of the Project on the local water environment is considered separately in ES Chapter 21 Water Resources and Flood Risk **[APP-035]**. **[Paragraph 5.4]** The figure of 240 non-designated heritage assets relates to the number of records held by the Essex Historic Environment Record. Further heritage assets and buried archaeological remains have been identified through the assessment of aerial imagery and geophysical survey as presented in Table 25.11 in ES Chapter 25 Onshore Archaeology and Cultural Heritage **[APP-039]**. **[Paragraph 5.5]** The definitions of direct and indirect impacts on onshore archaeology and cultural heritage were agreed at scoping. The potential for the Project to create an effect which may lead to a change in the local water environment, which may then lead to an effect on buried archaeological and geoarchaeological remains is considered an indirect effect

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		25.5.4.1 explains that the geophysical surveys carried out to date have used detailed magnetometry. The proposed scheme area covers a range of different environments and deposits, some of which will be less suited to the use of magnetometry, such as peat and alluvium that may be present within river valleys and floodplains (e.g. Area 5, Area 10, Tendring Green North, Area 12, Little Clacton Road etc.). Alternative approaches may therefore be needed to investigate parts of the scheme, which may include the use of alternative geophysical techniques (Electromagnetism, Ground Penetrating Radar etc.), borehole surveys or excavation. It is also important to note that deposits such as alluvium can act to mask buried archaeological remains, making it harder to identify remains using some of the evaluation approaches discussed within this document. Furthermore, magnetometry will not identify all archaeological features and remains that may be present, such as organic structures/remains that are made of wood. Alternative approaches would be needed to identify and investigate these sorts of remains. **[Paragraph 5.7]** 25.5.4.2 (paragraph 211) states that a prehistoric ditch was identified during the evaluation excavations at the proposed substation location. It was noted that the ditch was recorded in isolation as there were no corresponding geophysical anomalies. If the magnetometer survey did not identify the ditch feature as part of the evaluation works, it suggests that there is the potential for further previously unknown archaeological remains to be present within the proposed scheme area. **[Paragraph 5.8]** 25.5.4.3.3 (paragraph 230) explains that the Ardleigh Gravels are highly significant Palaeolithic geoarchaeological resource. It is further stated that any works that may impact these deposits will be assessed through a geoarchaeological watching brief on any Ground Investigation (GI) works (paragraph 231). We recommend that the geoarchaeologists are allowed to feed into the design of the GI works to maximise the potential to investigate these significant remains and to ensure opportunities to recover samples are not missed. **[Paragraph 5.9]** 25.5.7 (paragraph 239) states that the non-designated heritage assets are likely to be low heritage importance. We recommend that this statement is reviewed as additional data is obtained, particularly as trial trench evaluation has not been carried out in most of the proposed scheme area. This would be in-line with the precautionary approach taken for this project, as mentioned in paragraph 241. **[Paragraph 5.11]**	and is assessed in Section 25.6.1.3 of ES Chapter 25 Onshore Archaeology and Cultural Heritage **[APP-039]**. **[Paragraph 5.6]** Detailed magnetometry was considered an appropriate survey technique to inform the assessment as it can quickly evaluate large areas and, under favourable conditions, identify a wide range of archaeological features. Alternative geophysical survey methodologies would be considered where the geoarchaeological assessment, or the results of the detailed magnetometry survey, identified the need for it, as was detailed within the WSI for Geophysical Survey approved by the Onshore Cultural Heritage Expert Topic Group, with Essex County Council and Historic England. The WSI for Geophysical Survey will be appended to the Outline Onshore Written Scheme of Investigation **[APP-247]**, and an updated version of which will be submitted at Deadline 5. **[Paragraph 5.7]** The Applicant has committed to a programme of project-wide trial trench and geoarchaeological evaluation which will target archaeological anomalies as well as sample apparent 'blank' areas as identified by the geophysical survey. In ongoing consultation with Historic England and Essex County Council (Places Services), the Applicant is following the approach discussed with Five Estuaries and is in the process of drafting an AMS and Trial Trench Plan and updating the Outline Onshore WSI **[APP-247]** to be submitted into the Examination at Deadline 5. **[Paragraph 5.8]** The Applicant will ensure the geoarchaeologists input into the GI scope of works and identify which works require monitoring and sampling. This will ensure a targeted and bespoke approach to further geoarchaeological assessment. This will be detailed in the AMS to be submitted at Deadline 5. **[Paragraph 5.9]** All non-designated heritage assets were assessed using the precautionary approach as defined in Section 25.4.3.3 of ES Chapter 25 Onshore Archaeology and Cultural Heritage **[APP-039]**. The statement in paragraph 239 refers to the perceived heritage importance of Post Medieval agriculture and modern military activity, not the perceived heritage importance of all types of heritage asset. **[Paragraph 5.11]** The Applicant, in discussion with Historic England and Essex County Council (Places Services) (in combination with Five Estuaries), is following the approach agreed with Five Estuaries and is in the process of drafting an AMS and Trial Trench Plan and updating the Outline Onshore WSI **[APP-247]** to be submitted into the Examination at Deadline 5.

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		2.5.11 – The geoarchaeological investigations carried out so far have demonstrated the potential of the Palaeolithic and Holocene period sediments to be present within the proposed scheme area, including the potential for archaeological and palaeoenvironmental remains to be preserved. We are pleased to see that the high potential of peat has also been recognised (paragraph 266). We therefore recommend that the preliminary deposit is utilised to help guide the geophysical survey work, as some of the deposits are less well suited to techniques such as magnetometry (e.g. the peat and alluvium). This may help develop a survey strategy that will help target the approaches used to investigate the proposed development area, reducing the risk of using a technique that will not provide the information needed to understand the site. **[Paragraph 5.12]** 2.5.6.1 (paragraph 278) states that the proposed development may interact with the local hydrological processes which may result in indirect impacts to buried archaeological remains. It should be noted that Historic England consider impacts to the water environment, and therefore to the preservation of nearby archaeological sites to be a direct physical impact. **[Paragraph 5.15]** 25.6.1.1 – Outlines the potential direct physical impacts to designated heritage and non-designated (25.6.1.2) heritage. The list of potential impacts includes the majority of what we would expect to see, but we recommend that compression is also considered; this is particularly important for the peat identified across the site. **[Paragraph 5.16]** 25.6.1.1 (paragraph 299) states that it is not possible at this stage to identify each and every heritage asset representative of below ground archaeology that may be impacted by construction works, but that it is possible to develop a clear understanding of the archaeological potential from the evaluation work carried out to date. We would question this as it has been noted that some of the cropmark features were identified within the geophysical survey, and that some remains may be being masked by deposits such as peat and alluvium. There is the potential that some features and remains have not yet been identified. In addition, the findings of the geophysical survey have not been investigated for most of the scheme area through trial trench evaluation excavations, and so it is not clear how effective this technique has been. This leaves a level of uncertainty about the archaeological potential of the scheme area as well as the potential impacts of the proposed project. **[Paragraph 5.17]**	**[Paragraph 5.12]** The definitions of direct physical impacts and indirect physical impacts were agreed at scoping and both direct and indirect impacts are given the same weight. The Applicant considers that where the Project may cause a change which then has an effect on a receptor which would have otherwise been unaffected is an indirect effect. **[Paragraph 5.15]** ES Appendix 25.6 Geoarchaeological DBA **[APP-152]** identified peat at the landfall to be located at a minimum depth of 3m below ground level. At this depth any impacts from compression as a result of construction activities are considered unlikely. It is noted that there is also a general potential for peat to be preserved within the alluvium within other areas of the onshore project area, but this is likely to be thin and probably not located at shallow depths i.e. <1.2m deep. Again, any impacts from compression is considered unlikely. **[Paragraph 5.16]** The Applicant considers the desk-based assessments, non-intrusive survey and intrusive evaluation work to form a proportionate basis upon which to base the ES assessment and make an informed judgement on the impacts of the development upon the heritage significance of known and potential archaeological remains. The approach to further evaluation work and subsequent mitigation has been discussed with Historic England and Essex County Council (Places Services) (in combination with Five Estuaries). The Applicant has committed to following the approach agreed with Five Estuaries and is in the process of drafting an AMS and Trial Trench Plan and updating the Outline Onshore WSI **[APP-247]** to be submitted into the Examination at Deadline 5. **[Paragraph 5.17]** A precautionary approach has been undertaken whereby the importance of the alluvial and peat deposits at the landfall are considered to be of high importance as there is uncertainty regarding their significance. This represents good practice in Cultural Heritage Impact Assessment (IEMA, IHBC and CIfA, 2021) and reduces the potential for impacts to be under-estimated. The Applicant has committed to undertaking further geoarchaeological work and monitoring of GI works post-consent as detailed within the Outline Onshore WSI **[APP-247]**. **[Paragraph 5.18]** The Applicant is in discussion with Historic England and Essex County Council (Places Services) (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

Applicants Ref	Section of WR	Key Paragraphs from WR	Applicant's Response
		25.6.1.2.1 (paragraph 313) explains that there is uncertainty regarding the precise nature, extent and depth of any alluvial and peat deposits within the landfall area. However, as the cables would be installed using HDD approaches in this area, it is stated that the magnitude of impact would be substantially reduced as a small area of a much more extensive deposit sequence would be impacted. We recommend that this is reconsidered as additional information becomes available because there is uncertainty regarding the significance of these deposits. **[Paragraph 5.18]** 25.6.1.2.3 (paragraph 329) states that the project has committed to additional programmes of survey and evaluation. It is states that the work may indicate the presence of previously unknown buried archaeology, which we feel should be classed a risk for this development. We have previously advised during pre-application consultation that the evaluation work is needed to understand the potential impacts of the proposed scheme and inform the examination process. **[Paragraph 5.19]** 25.6.1.3.1 (paragraph 346) states that the impact to wetter areas of the development area would not be subject to lasting dewatering because of the proposed work, and so no indirect physical effects on the deposits is anticipated. It should be noted that even temporary dewatering activities could impact vulnerable archaeological remains and it is important to consider it will take for conditions to rebound on the site (both in terms of the water levels and the water chemistry). **[Paragraph 5.21]**	process of drafting an AMS and Trial Trench Plan and updating the Outline Onshore WSI **[APP-247]** to be submitted into the Examination at Deadline 5. **[Paragraph 5.19]** The Applicant has committed to undertaking archaeological mitigation prior to construction as detailed within the Outline Onshore WSI **[APP-147]**, therefore any impacts from temporary dewatering would occur following archaeological mitigation. In addition to this, ES Chapter 21 Water Resources and Flood Risk **[APP-035]** considers any dewatering would not significantly alter the movement or level of groundwater in the wider groundwater body. **[Paragraph 5.21]**
REP2-039_c	Comments on Environmental Statement: Volume 3.3, Appendix 15.1 Archaeological Assessment of Geophysical Data	It is therefore apparent that further, more detailed survey campaigns will be required to investigate the archaeological potential of the proposed development areas to ascertain the presence of both known and presently unknown heritage assets (i.e. wreck of historic vessel or aircraft). It is also acknowledged that further work will be needed to investigate the palaeo-landscape features in more detail (Sections 3.2.28, 3.2.39 and 5.1.3). It is therefore apparent that the recommendations made in this appendix remain valid, requiring post-consent participation by professional, accredited and experienced marine archaeological contractors. Such involvement will encompass corroboration between geophysical data interpretation and geotechnical survey planning. **[Paragraph 6.2]**	The approach to the delivery of further geophysical and geoarchaeological investigation is set out in the Outline Offshore WSI (which has been revised and submitted at Deadline 3) (Document Reference: 7.11, Rev 2). Specifically, paragraph 81 requires that the geotechnical survey specification will be informed by the previous stages of work including the archaeological interpretation of geophysical data and that geoarchaeological assessment will be carried out in accordance with the existing interpretations of sub-bottom profiler data assessed for North Falls. **[Paragraph 6.2]**
REP2-039_d	Comments on Environmental Statement: Volume 3.3, Appendix 25.1: Cable Landfall Search Area Historic Environment DBA	Section 3.3.3 (paragraph 27) states that freely available Environment Agency LiDAR data was utilised as part of the evaluation works to investigate the archaeological potential of the study area. As part of Historic England's Scoping Response (dated 12th August 2021), we advised that resolution of 1m is the basic minimum needed for archaeological assessments using LiDAR, but where greater detail is required, higher resolution is preferable. This is in line with Historic	The Applicant can confirm that the whole study area was covered by National LiDAR Programme LiDAR data at 1m resolution with some areas measuring an accuracy of 0.25m resolution as documented in Section 9 of Annex D Air Photo Services Report within ES Appendix 25.1 Cable Landfall Search Area Historic Environment DBA **[APP-144]**. **[Paragraph 7.1]**

Applicants Ref	Section of WR	Key Paragraphs from WR	Applicant's Response
		England's guidance Using Airborne LIDAR in Archaeological Surveys (2018). **[Paragraph 7.1]**	
REP2-039_e	Comments on Environmental Statement: Volume 3.3, Appendix 25.2: Onshore Cable Corridor(s) and Onshore Substation Zone Historic Environment DBA	Section 3.3 (paragraph 30) states that freely available Environment Agency LiDAR data was utilised as part of the evaluation works to investigate the archaeological potential of the study area. As part of the Historic England Scoping Response (as dated above), we advised that resolution of 1m is the basic minimum needed for archaeological assessments using LiDAR, but where greater detail is required, higher resolution is preferable. This is in line with Historic England's guidance, as referenced in 7.1 above. **[Paragraph 8.1]**	The Applicant can confirm that the whole study area was covered by National LiDAR Programme LiDAR data at 1m resolution with some areas measuring an accuracy of 0.25m resolution as documented in Section 9 of Annex D Air Photo Services Report within ES Appendix 25.2 Onshore Cable Corridors and Onshore Substation Zone Historic Environment DBA Part 2 of 2 **[APP-146]**. **[Paragraph 8.1]**
REP2-039_f	Comments on Environmental Statement: Volume 3.3, Appendix 25.6: Geoarchaeological DBA	Section 7.2.6 states that no stratigraphic information data is available for GCZ2, and so assessing the survival and potential of the Quaternary deposits is not possible. This highlights the gaps in the current dataset and points to the further work that is needed. **[Paragraph 9.6]** Table 7 outlines the recommendations for further work for the different GCZ areas. The recommendations seem sensible, but as stated above, there are gaps in our understanding due to a lack of evidence in some areas. This suggests that some deposits, such as peat may be mapped in other areas and would therefore need to be investigated as well. **[Paragraph 9.7]**	The Applicant has committed to further geoarchaeological assessment post-consent as detailed within the Outline Onshore WSI **[APP-147]**. **[Paragraph 9.6]** The Applicant has committed to further geoarchaeological assessment post-consent as detailed within the Outline Onshore WSI **[APP-147]**. **[Paragraph 9.7]**
REP2-039_g	Comment on Environmental Statement: Comments on Volume 3.3 Appendix 25.8 Archaeological Geophysical Survey Report	Section 2.3.1 states that a cart-based gradiometer system was used to investigate specific areas of the proposed Scheme area. It would be useful to know if hand-held systems were used in the areas where the cart could not be used. **[Paragraph 10.1]** The geology of each of the sampled areas has been stated in the report. It is not clear if the discussion of the superficial deposits present in the different areas represents the BGS data or if the recent GI works have been. It has been noted in Appendix 25 that there are limitations in the BGS data, which has been enhanced in some areas by the recent GI works. It is important to consider the findings of the geoarchaeology work to date, as it has highlighted the presence of peat and alluvium in different areas; these sorts of deposits may mask buried archaeological remains and features, which may not be easily identified using gradiometry. **[Paragraph 10.2]** The impacts of possible weather conditions have not been discussed within the report. Several phases of the survey work were carried out over winter months so it would be useful to understand if this impacted the completion of the survey work or the results in anyway. **[Paragraph 10.3]**	No hand-held systems were used on the scheme. As the majority of the survey areas were arable, all data was collected using the cart system described in the reporting. The final seven hectares that is still outstanding is the result of land access restrictions and this will also be completed using the cart system. **[Paragraph 10.1]** Wessex Archaeology's geophysicists did consult with their geoarchaeologists throughout the reporting process, which has been split over several years, however the results of the GI works were not available at the time of the reporting and the report was not re-evaluated at the time of adding the results of the most recent phase of geophysical survey which amounted to approximately 10 hectares. While there is value in identifying the areas of superficial deposits such as alluvium and peat, the Applicant would like to highlight that the geophysical survey did record archaeological anomalies within these kinds of deposits as features have been cut into them during deposition. The Applicant will look at the areas of alluvium and peat to inform the trial trenching and geoarchaeological evaluation strategy to be submitted as part of the AMS and revised Outline Onshore WSI **[APP-247]** at Deadline 5. **[Paragraph 10.2]** The weather only affected the scheduling of some surveys as the ground became waterlogged and unsuitable for traversing, however these parcels were ultimately

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		The results of the geophysical survey should be tested with trial-trenching evaluation. We note, for example, that the geophysical survey has, in several locations, failed to define potential archaeological features recorded as cropmarks by air photography. **[Paragraph 10.4]**	rescheduled and completed so the weather did not ultimately affect completion. The weather conditions the surveys were completed under did not affect the data collected by the fluxgate magnetic gradiometers. **[Paragraph 10.3]** The Applicant is in discussion with Historic England and Essex County Council (Places Services) (in combination with Five Estuaries) to agree a programme of project-wide trial trenching and geoarchaeological evaluation post-consent to test the geophysical anomalies and cropmarks features identified from aerial imagery. The results of the trial trenching and geoarchaeological evaluation will inform the detailed design phase and archaeological mitigation approaches. The Applicant is following the approach discussed with Five Estuaries and is in the process of drafting an AMS and Trial Trench Plan and updating the Outline Onshore WSI **[APP-247]** to be submitted into the Examination at Deadline 5. **[Paragraph 10.4]**
REP2-039_h	Comments on Environmental Statement: Volume 3.3 Appendix 25.9: Five Estuaries Archaeological and Geoarchaeological Monitoring of Ground Investigation Works Report	We are pleased to see that samples have been recovered from the peat deposits (Section 6.2.5). We would recommend that these samples are assessed to understand their potential and their significance, and to inform the assessment of the impact of the proposed Scheme. **[Paragraph 11.3]**	These samples are stored in a stable condition and will be assessed post-consent as part of the project-wide programme of geoarchaeological assessment. This will be detailed further within the revised Outline Onshore WSI **[APP-247]** submitted into Examination at Deadline 5. **[Paragraph 11.3]**
REP2-039_i	Comments on Environmental Statement: Comment on Volume 3.3 Appendix 25.10: Five Estuaries and North Falls Onshore Substation Area Archaeological Evaluation Report	Section 7 presents the results of the environmental sampling strategy. It is stated in Section 7.1.1 that eight bulk samples were recovered in total from the excavations, all of which sampled the cremation burial identified in Trench 22. It is not clear why other features were not sampled as part of the evaluation works to understand the archaeological potential of the wider area, and for a wider range of features. Focusing all the attention on one feature will not help guide the sampling strategy for the future excavation phase of investigations. **[Paragraph 12.2]**	For Phase 1 archaeological evaluation the majority of the linear ditches were interpreted as land management / field boundaries which were indicated on the Tithe / OS maps. Overall, the linear ditches contained a combined lack of charcoal rich deposits or any dating material to warrant any environmental sampling. Three pits in Phase 1 contained charcoal which weren't sampled and no request from Place Services was made for these pits to be sampled. It is worth noting that the majority of the features contained a sterile fill with no cultural material which would justify sampling. During consultation with Place Services no further requests for sampling during the site visits were requested hence the sparse sampling on site. **[Paragraph 12.2]**
REP2-039_j	Comments on Environmental Statement: Volume 3.3 Appendix 25.12: Five Estuaries & North Falls Onshore Substation Area Palaeolithic Evaluation Report: Phase 2	Section 8.2.5 states that the evaluation has identified the localised presence of sediments with palaeoenvironmental potential in the top 3m of the Ardleigh Gravel. These have been sampled as part of the evaluation, but they have not been assessed. This could be classed as a missed opportunity at this stage as the samples would help to establish the deposits potential and therefore the impacts of the proposed development. It is stated that the assessment of the two samples taken to date would represent sufficient mitigation. We would recommend that this statement should be reassessed once the samples have been analysed. **[Paragraph 13.6]**	These samples are stored in a stable condition and will be assessed post-consent as part of the project-wide programme of geoarchaeological assessment. This will be detailed further within the revised Outline Onshore WSI **[APP-247]** submitted into Examination at Deadline 5. **[Paragraph 13.6]** For Phase 2 archaeological evaluation the majority of the linear ditches were interpreted as land management / field boundaries which were indicated on the Tithe / OS maps. Overall, the linear ditches contained a combined lack of charcoal rich deposits or any dating material to warrant any environmental sampling.

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		Section 7.1.1 states that two bulk samples were collected from undated pits 8303 and 10103. It is not clear why other features were not sampled as part of the evaluation works to understand the archaeological potential of the wider area, and for a wider range of features. This would help develop a sampling strategy for the next phase of excavation works. **[Paragraph 13.7]**	Two pits in Phase 2 were sampled as they contained charcoal, whereby the rest of the features did not contain any substantial amounts of charcoal to warrant any environmental sampling. It is worth noting that the majority of the features contained a sterile fill with no cultural material which would justify sampling. During consultation with Essex County Council (Places Services) no further requests for sampling during the site visits were requested hence the sparse sampling on site. **[Paragraph 13.7]**
REP2-039_k	Comments on Environmental Statement: Volume 7 Outline Project Environmental Management Plan, dated July 2024	We are pleased to see that Historic England are listed in section 3.2 under Regulators and Stakeholders. However, we recommend that in Section 7, it would be useful to include marine archaeology and reference to the Outline Offshore WSI in Section 8. **[Paragraph 15.1]**	As set out in the response to comment in **Paragraph 4.13,** above, the Offshore In-Principle Monitoring Plan (Document Reference 7.10; [APP-245]) refers to the Offshore WSI for the details of the offshore archaeology monitoring, as the appropriate document for the provision of this information.
REP2-039_l	Comments on Environmental Statement: Volume 7 Outline Offshore Written Scheme of Investigation for archaeology	We have identified several errors in this document which serves to demonstrate how it can only the considered as "outline". For example, in the Glossary of Acronyms, BMAPA is given as "Marine Aggregates Reporting Protocol for Archaeological Discoveries", which is incorrect – BMAPA is the British Marine Aggregate Producers Association. Additionally, the NHER is given as Essex Historic Environment Record, which is also incorrect, and the NMHR is duplicated. The EHER is also incorrect in Table 1.2. **[Paragraph 16.1]** Section 1.4, paragraph 56 sets out the responsibilities of the retained archaeologist. This should include provisions for providing training to project delivery contractors, as a part of the implementation of a Protocol for Archaeological Discoveries (PAD). **[Paragraph 16.3]** We are pleased to see that the method statement for the geoarchaeological work will be prepared in consultation with Historic England and that there will be geoarchaeological input into the geotechnical survey (Section 1.5.2). However, it should be noted that the geotechnical cores are not always positioned to sample the features of greatest archaeological interest. The potential to recover purposive cores for geoarchaeological and palaeoenvironmental assessment should also be considered, particular in high potential areas such as could be impacted by this proposed development. We therefore recommend that the geoarchaeological specialists are allowed direct access to cores, as it is better to record and assess continuous core sequences rather than isolated deposits, as this allows for greater reliability and confidence in the resulting conclusions. **[Paragraph 16.7]** We are pleased to see the specific objectives have been identified for the features identified within the offshore area (Section 1.5.2, paragraph 73). This includes the dating and palaeoenvironmental assessments. We recommend that the choice of dating techniques is carefully considered, as some of the sediments may exceed the upper limit of radiocarbon dating. In addition, it is important to consider the material selected for dating,	These errors have been updated in the glossary and Table 1.2 and a revised Outline Offshore WSI submitted at Deadline 3 (Document Reference: 7.11, Rev 2). **[Paragraph 16.1]** This has been updated in paragraph 60 of the revised Outline Offshore WSI submitted at Deadline 3 (Document Reference: 7.11, Rev 2). **[Paragraph 16.3]** Paragraph 83 of the Outline Offshore WSI (which has been revised and submitted at Deadline 3) (Document Reference: 7.11, Rev 2) states that provision will be made for archaeology specific boreholes to be acquired where deposits of archaeological or palaeoenvironmental potential have been identified. Paragraph 86 of the Outline Offshore WSI (which has been revised and submitted at Deadline 3) (Document Reference: 7.11, Rev 2) states that geotechnical cores, or a representative sample of cores agreed with the archaeological contractor, will be retained undisturbed until a selection of cores for archaeological recording has been made. If the cores cannot be retained then further steps should be taken, such as having an archaeologist present during sampling operations. **[Paragraph 16.7]** The approach set out in the Outline Offshore WSI (which has been revised and submitted at Deadline 3) (Document Reference: 7.11, Rev 2) requires that, prior to the commencement of any site investigation campaign, a method statement will be prepared by the retained archaeologist setting out the specific details of the campaign to inform consultation with the archaeological curators regarding the scope and proposed locations of geotechnical work. This would include any specific requirements for individual samples, such as additional measures to ensure samples required for Optically Stimulated Luminescence (OSL) dating, for example, are not exposed to light during collection, storage or recording. The archaeological curators will also be consulted on subsequent geoarchaeological assessments commissioned by the project team which will ensure that the most appropriate techniques of analysis are applied to the acquired samples. **[Paragraph 16.8]**

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		particularly for the organic deposits such as peat. This is because the different fractions of peat (e.g. plant macrofossils, humin fraction, humic acid fraction etc.) can return different radiocarbon dates. **[Paragraph 16.8]** It is apparent that the Outline Offshore WSI will require amendment, should a DCO be obtained, to produce a specific WSI as necessary to deliver the proposed development. For example, detail about the different techniques and approaches (palaeoenvironmental, chemical or biological assessment and scientific dating) and remains (plant remains, pollen, insects, diatoms, ostracods, foraminifera etc.) that will be investigated. This will ensure that it is clear what is expected in the work post consent and pre-construction, but also to identify any issues that will need to be addressed. For example, the issues discussed above about the choice of scientific dating technique as well as how samples will be recovered, stored and assessed. **[Paragraph 16.9]** We agree that avoidance forms the primary method of mitigation through the use of AEZs (Section 1.6.1. Section 1.6.2 states that a Protocol for Archaeological Discoveries (PAD) will be implemented as part of the mitigation strategy to deal with any unidentified sites or unexpected discoveries. To support the programme of training for project staff, we recommend the inclusion of materials as they appear when first discovered (i.e. when wet and muddy). We also recommend that the PAD provides for additional archaeological assessments to be carried out if significant remains are identified. **[Paragraph 16.12]** Table 1.9 states that when embedded mitigation has been carried out for "A2" anomalies (additional mitigation to reduce or offset impacts) that the residual effect can generally be classed as being 'minor adverse'. We recommend that this is reassessed as new information becomes available as at this stage the results of the geophysical survey have not been tested/ground truthed. **[Paragraph 16.15]** Section 1.9.4, paragraph 166 outlines the post-fieldwork assessments that will be carried out. This section will require updating to state the sort of remains that will be assessed as part of the palaeoenvironmental characterisation work so that it is clear. For example, will the samples be assessed in terms of the presence, absence and condition of remains such as plant macrofossils, charcoal, insect remains, pollen, ostracods, diatoms, foraminifera etc. **[Paragraph 16.16]** There is no Protocol for Archaeological Discoveries (PAD) appended to the Outline WSI. It is therefore essential that the consent provisions to produce a WSI post-consent (should permission be forthcoming) will stipulate the inclusion of a (draft) PAD in any Offshore WSI subsequently produced. **[Paragraph 16.17]**	In the draft Development Consent Order (dDCO) [**REP2-007],** at Schedule 8 condition 21 (2) and Schedule 9 condition 22 (2) require submission and approval by the Marine Management Organisation of a 'marine written scheme of archaeological investigation', in accordance with the Outline Offshore WSI no later than six months prior to the commencement of licensed activities. dDCO Schedule 8 condition 21 (3) and dDCO Schedule 9 condition 22 (3) require that pre-construction archaeological investigations and pre-commencement material operations which involve intrusive seabed works must only take place in accordance with a method statement produced under the written scheme of investigation specific to the relevant pre-construction activities (which must accord with the details set out in the Outline Offshore WSI). **[Paragraph 16.9]** The requested additional information is provided in paragraphs 120 and 121 of the revised Outline Offshore WSI submitted at Deadline 3 (Document Reference: 7.11, Rev 2). **[Paragraph 16.12]** Paragraph 99 of the Outline Offshore WSI (which has been revised and submitted at Deadline 3) (Document Reference: 7.11, Rev 2) requires that, if remains of archaeological interest are identified, any further work would require detailed methodologies to be set out in a method statement, to be agreed with the Historic England. The specific approaches would be agreed proportionate to the significance of the archaeological material and the potential impact, which would ensure reassessment of any residual effect as an essential requirement. **[Paragraph 16.15]** The clarification that samples will be assessed in terms of the presence, absence and condition of remains such as plant macrofossils, charcoal, insect remains, pollen, ostracods, diatoms, foraminifera etc, has been added to Section paragraph 76 and paragraph 173 of the revised Outline Offshore WSI submitted at Deadline 3 (Document Reference: 7.11, Rev 2). **[Paragraph 16.16]** dDCO Schedule 8 condition 21(2)(g) and Schedule 9 condition 22 (2)(g)require that the 'marine written scheme of archaeological investigation' that must be in accordance with the Outline Offshore WSI, which must include a reporting and recording protocol, designed in reference to the Offshore Renewables Protocol for Reporting Archaeological Discoveries. **[Paragraph 16.17]**

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REP2-039_m	Comments on Environmental Statement: Volume 7 Outline Onshore Written Scheme of Investigation (WSI)	It is stated in Appendix 25.1 that alternative geophysical survey techniques may be needed at key areas of the route, where magnetometry may be less effective due to the deposits or types of archaeology that may be present. This has not been discussed in Section 6.2 within the Outline WSI and should be included so that it is clear what work is expected post-consent. **[Paragraph 17.4]** Section 6.4 (paragraph 74) explains that a programme of trial trench evaluation excavation will be carried out post-consent that will target anomalies identified following the geophysical, aerial photography and lidar surveys. It also states that some trenches may be targeted on apparent blank areas, but we would recommend that this is something that is needed. Several areas of the proposed Scheme area include deposits, such as peat and alluvium that can mask buried archaeological remains. There is the potential that the approaches used to evaluate the Scheme area to date may not have identified some of the features and remains. It is therefore important that apparent blank areas are investigated. **[Paragraph 17.6]** Appendix A: Example (model) Clauses – Mitigation Works Specification: Archaeological Excavation and Archaeological Monitoring/Watching Brief. Section A1.2, para 127 references all the previous editions of the Regional Research Framework for the East of England. It should be noted that the edition published online in 2021 represents the most up to date one, superseding the previous editions. References should therefore be amended throughout the document to the most recent version of the Research Frameworks, and to the research questions presented within this document. **[Paragraph 17.10]**	The Outline Onshore WSI **[APP-247]** is being updated to align with the revisions being made to the Five Estuaries Outline Onshore WSI as discussed in ongoing consultation with Historic England and Essex County Council (Place Services) (in combination with Five Estuaries). The revised Outline Onshore WSI **[APP-247]** will be submitted into Examination at Deadline 5. **[Paragraph 17.4]** The Applicant is in discussion with Historic England and Essex County Council (Places Services) (in combination with Five Estuaries) to agree a programme of project-wide trial trenching and geoarchaeological evaluation post-consent to test the geophysical anomalies and cropmarks features identified from aerial imagery, as well as sample apparent blank areas. The Applicant is following the approach discussed with Five Estuaries and is in the process of drafting an AMS and Trial Trench Plan and updating the Outline Onshore WSI **[APP-247]** to be submitted into the Examination at Deadline 5. **[Paragraph 17.6]** The revised Outline Onshore WSI **[APP-247]** will include reference to the most recent version of the Research Frameworks and research questions. This will be submitted into the Examination at Deadline 5. **[Paragraph 17.10]**
REP2-039_n	Conclusions	We understand from the submitted application that to date no geotechnical samples have been collected as a part of this development project or to inform this ES. We wish to highlight that this approach is at the applicant's own risk. This work must be completed prior to the commencement of construction activities and in line with the project's agreed Offshore WSI. As this is unusual for DCO applications to be made without supporting geotechnical data, we recommend that it is separately secured within the DCO/dMLs for geotechnical work and its geoarchaeological assessment. We further recommend that the condition should specify the completion of stages of analysis prior to construction to ensure that sufficient material across the project area is collected before any impacts occur. **[Paragraph 19.3]** We have made recommendations for amendments to the draft DCO and Outline Offshore WSI which should be agreed prior to the finalisation/certification of these documents.	The Applicant's position is that the DCO/dML conditions do not need to be amended to separately secure geotechnical work and its geoarchaeological assessment or to specify the completion of stages of analysis prior to construction. A commitment to marine geoarchaeological investigations is established through Section 1.5.2 of the Outline Offshore WSI (which has been revised and submitted at Deadline 3) (Document Reference: 7.11, Rev 2). Furthermore, DCO Schedule 8 condition 21 (2) and DCO Schedule 9 condition 22 (2) require a 'marine written scheme of archaeological investigation', in accordance with the outline offshore WSI, which must include: • a method statement for further site investigation including any specifications for geophysical, geotechnical and diver or remotely operated vehicle investigations; and • archaeological analysis of survey data. DCO Schedule 8 condition 21(2))(h) and DCO Schedule 9 condition 22(2)(h) require a timetable for all further site investigations, which must allow sufficient opportunity to establish a full understanding of the historic environment within the offshore Order

Applicants Ref	Section of WR	Key Paragraphs from WR	Applicant's Response
		[Paragraph 19.4] The applicants have given this matter consideration and have provided information to inform the examination via the historic Environment chapters of the ES. Further information and documents are however required to establish an appropriate programme of evaluation and mitigation for non-designated heritage assets. **[Paragraph 19.6]** We consider this information is necessary to fully inform the decision-making process, and the planning balance as set out in the relevant policies, and recommend the applicant is asked to provide the additional wording and documents we have set out above. This would need to be before the end of the examination. **[Paragraph 19.7]** An appropriate programme of mitigation is required in relation to the geoarchaeology and a mechanism for managing this work needs to be provided. We recommend additional palaeoenvironmental and geoarchaeological works are also included AMP and a specific WSI created to inform this area of work. **[Paragraph 19.8]** We also recommend Historic England is also given the opportunity to comment on the revised documents and wording alongside Essex County Council's archaeological specialists. **[Paragraph 19.9]**	limits, and the approval of any necessary mitigation required as a result of the further site investigations prior to commencement of licensed activities. As such, the Applicant is committed to the delivery of geoarchaeological assessment and analysis as necessary to establish both a full understanding of the historic environment and to the approval of any necessary mitigation prior to construction. The Applicant cannot commit to the completion of all geoarchaeological work prior to the commencement of construction activities. The Applicant is committed to a staged programme of assessment, analysis and, if warranted, publication as a final stage. As the timescales for publication cannot be predicted, it is not possible to confirm that this final stage would be completed prior to construction. Section 1.9.1 of the Outline Offshore WSI (as revised and submitted at Deadline 3) (Document Reference: 7.11, Rev 2) addresses the requirements for method statements which will include a timetable for investigation and post-investigation actions to be agreed in consultation with Historic England. The Applicant can agree, therefore, that any post-investigation actions which remain outstanding prior to construction would be in accordance with a timetable to be agreed with Historic England at that time. **[Paragraph 19.3]** The Outline Offshore WSI has been revised has been revised and submitted at Deadline 3) (Document Reference: 7.11, Rev 2). The Applicant does not propose to amend the draft DCO/dML conditions in respect of offshore geoarchaeological measures for the reasons outlined above. **[Paragraph 19.4]** The Applicant is in discussion with Historic England and Essex County Council (Places Services) (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. The Applicant is following the approach discussed with Five Estuaries and is in the process of drafting an AMS and Trial Trench Plan and updating the Outline Onshore WSI **[APP-247]** to be submitted into the Examination at Deadline 5. **[Paragraphs 19.6 and 19.7]** The Applicant is following the approach discussed with Historic England and Essex County Council (Places Services) (in combination with Five Estuaries) and is in the process of drafting an AMS and Trial Trench Plan and updating the Outline Onshore WSI **[APP-247]** to be submitted into the Examination at Deadline 5. A specific WSI relating to additional palaeoenvironmental and geoarchaeological works will be developed post-consent following the results of the geoarchaeological monitoring of GI works and revision to the Project's deposit model. **[Paragraph 19.8]** The Applicant is in discussion with Historic England and Essex County Council (Places Services) and can confirm draft copies of the AMS, Trench Plan and revised Outline

Applicants Ref	Section of WR	Key Paragraphs from WR	Applicant's Response
			Onshore WSI **[APP-247]** will be circulated for comment prior to submission into the Examination at Deadline 5. **[Paragraph 19.9]**

3.3 Applicant's Response to London Gateway Port Limited – Written Representation [REP2-041]

Applicants Ref	Theme	Key Paragraphs from WR	Applicant's Response
REP2-041_a	n/a	n/a	The Applicant will respond to the full London Gateway Port Limited (LGPL) Written Representation [**REP2-041**] in further detail at a future Deadline. Preliminary responses to the LGPL Written Representation summary [**REP2-042**] are provided in Section 3.4. Any failure by the Applicant to respond at this stage to a particular point made by LGPL should not be taken as acceptance of that point by the Applicant.

3.4 Applicant's Response to London Gateway Port Limited – Written Representation Summary [REP2-042]

Applicants Ref	Theme	Key Paragraphs from WR	Applicant's Response
REP2-042_a	LGPL Harbour Empowerment Order	To facilitate current and future shipping, LGPL has powers under article 13 of the HEO to dredge in certain areas of the river Thames and the approaches to the river Thames. In particular, LGPL may dredge (and maintain dredged) areas of the navigational channel known as 'The Sunk' down to a depth of 17.5m below Chart Datum (CD1). **[Paragraph 3]**	The Applicant acknowledges that, to facilitate current and future shipping, LGPL has powers under the HEO to dredge certain areas of the Sunk DW route down to a depth of 17.5m under Chart Datum.
REP2-042_b	Impact on Deep Water Routes	The proposed export cable corridor (the "ECC") crosses the Deep Water Routes into the Port of London – comprising the Sunk and Trinity which lead to Black Deep (referred to as the "DWRs"). The DWRs are the only approaches available for larger vessels to access the Port. The DWRs are currently both used for entry and exit into/from the Port but in the future, as vessels get bigger, it may be necessary for one DWR route to be used for entry and one for exit. As shown on Sheet 2 of the Work Plans (Offshore) [AS-020], Work No. 3 crosses through both the Sunk and Trinity areas. **[Paragraph 4]**	The Applicant notes that within the base case scenario, either the Sunk or Trinity DW route can be used for entry/exit. The Applicant notes LGPL's position that it may be necessary that as vessels get bigger, one route may need to be used for entry and one for exit, but that is speculative and not confirmed at this time. Discussions with ports are ongoing on this topic, and the Outline Navigation Installation Plan [**APP-259**] will manage any temporary disruption , and is secured under the relevant DMLs of the dDCO at paragraph 21(1)(n) of Schedule 8, and paragraph 22(1)(n) of Schedule 9 [**REP2-007**]. The Applicant recognises the importance of maintaining vessel access to key local ports through appropriate cable burial and consideration of the potential for increases in vessel draught in the future. Technical discussions are currently ongoing internally to understand what is technically achievable in terms of burial depth over and in proximity to the DW routes, noting the ports' position that burial should be such that a dredged channel depth of 22m is achievable in the future.

Applicants Ref	Theme	Key Paragraphs from WR	Applicant's Response
REP2-042_c	Identified Impacts	Presently in the dDCO [REP1-011] there is no parameter regarding the depth at which the cables and any cable protection must be placed to maintain appropriate dredged depths in the DWRs. For example, no relevant parameter is set out in the requirements at Part 3 of Schedule 1 to the dDCO and nor in the DML at Part 1 of Schedule 9 to the dDCO. (Similarly, there is no detail on cable depth in the Cable Statement [APP-262] save only for a reference to a "target minimum cable burial depth of 0.6m below the seabed surface depending on the outcome of the cable burial risk assessment" – see para 19 of [APP-262.) If the cables or their protection are laid at too shallow a depth, they will preclude the use of the DWRs by certain vessels and will interfere with LGPL's statutory undertaking at the Port and the exercise by LGPL of its powers to dredge under the HEO. LGPL is also concerned regarding the temporary impacts on navigation to and from the Port caused by the carrying out of the works for Work No 3. **[Paragraph 6 and 7]**	The Applicant notes that LGPL has detailed potential impacts that may arise from the North Falls works. The Applicant can confirm that the listed impacts have been identified and considered within the Application including within the Navigation Risk Assessment (NRA) [**APP-106**], [**APP-107**], [**APP-108**] and Chapter 15 Shipping and Navigation [**APP-029**].
REP2-042_d	Future Case Vessel Size	LGPL are of the view that a Requirement must be added to the draft DCO [REP1-011] to secure a position that the passage of vessels with drafts of up to 20m should not be precluded by the authorised development and, for that purpose, to secure that the seabed within the DWRs can be dredged to a depth of at least 22m below CD. It is necessary and appropriate that this be dealt with by way of a Requirement, not by way of a subsidiary document. **[Paragraph 9]**	The Applicant can confirm that Section 14 of the NRA (Part 2 of the NRA [**APP-107**]) has considered a potential increase in vessel draught of up to 20m as a worst case within a future case scenario. This was based on feedback from stakeholders including LGPL during NRA consultation and the hazard workshop.
REP2-042_e	Modifications to DCO - Burial Depth	LGPL are of the view that a Requirement must be added to the draft DCO [REP1-011] to secure a position that the passage of vessels with drafts of up to 20m should not be precluded by the authorised development and, for that purpose, to secure that the seabed within the DWRs can be dredged to a depth of at least 22m below CD. It is necessary and appropriate that this be dealt with by way of a Requirement, not by way of a subsidiary document. We would propose a Requirement be added to Part 3 of Schedule 1 in the following terms: "Maintenance of Navigation 3A-(1) The undertaker must ensure that in the design, implementation, operation and maintenance of the authorised development and ancillary works, a dredged depth of the Deep Water Routes to a depth of 22m below CD is not precluded or impeded. (2) The undertaker must ensure that in the design, implementation, operation and maintenance of the authorised development and ancillary works, a dredged depth of the Deep Water Routes Buffer to a depth of 19m below CD is not precluded or impeded. (3) The undertaker must not relocate any boulders or archaeological finds to the Deep Water Routes or the Deep Water Routes Buffer." This would also require the inclusion of the following definitions: ""Deep Water Routes" means those parts of the Order limits within the Sunk and Trinity channels that are respectively more particularly shown [xxxxx] on [plan];"	It is the Applicant's position that, in relation to burial depth of cables, the proposed Requirement is not necessary. Discussions with ports are ongoing on this topic and the Applicant will continue to seek agreement on appropriate burial depths of cables with LGPL.

Applicants Ref	Theme	Key Paragraphs from WR	Applicant's Response
		""Deep Water Routes Buffer" means those parts of the Order limits within an area 200m either side of the Sunk channel that are more particularly shown [xxxxx] on [plan];" (Plan showing those parts of the Sunk and Trinity channels within the limits of Work No. 3 to be agreed with the Applicant). Following on from the above proposals for an additional Requirement to protect future dredge depths, certain amendments to the Protective Provisions for the Protection of London Gateway Port in Par 7 of Schedule 14 to the dDCO [REP1-011] necessarily flow. In addition to the Requirement set out above to secure the dredge depth, there remains the need for LGPL's involvement in the draft cable specification and installation plan as is already contemplated in the protective provisions to the Order. This is largely due to its importance in relation to programme and methodology for the relevant works. However, the same involvement is also required in the operations and maintenance plan which covers future maintenance activities for cable remedial burial, cable repairs and replacement and cable protection replenishment (see condition 13 to the DML in Part 1 of Schedule 9 to the dDCO [REP1-011]). There are certain other amendments to the Protective Provisions in Part 7 of Schedule 14 which LGPL seeks to protect its powers under the HEO which LGPL hopes to be able to agree with the applicant shortly. In relation to Condition 13(3) of the DML in Part 2 of Schedule 9 to the dDO [REP1-011], the permissible reduction in water depth of up to 5% must not apply to the DWRs, where such reduction would have the effect of inhibiting the ability to dredge the seabed to a depth of at least 22m below CD. **[Paragraph 9 and 14]**	

3.5 Applicant's Response to Maritime and Coastguard Agency – Written Representation [REP2-046]

Applicants Ref	Theme	Key Paragraphs from WR	Applicant's Response
REP2-046_a	NRA Methodology and Approach	**3.1.17 Environmental Statement Chapter 15 Shipping and Navigation (APP-029) and 3.3.16 Environmental Statement Appendix 15.1 Navigational Risk Assessment (APP-106, APP107 & APP-108)** The Applicant has undertaken a detailed Navigation Risk Assessment (NRA) in accordance with MCA guidance MGN (Marine Guidance Note) 654 and NRA risk assessment methodology. We are satisfied that appropriate traffic data has been collected in accordance with MGN654. This includes three 14- day marine vessel traffic surveys carried out in February 2022, July 2022 and January 2024 which was supplemented by three years of Automatic Identification System (AIS) data from 2020-23. Further surveys of the export cable corridor were also carried out in in the same three periods as above. MCA is content that the traffic data collection is suitable for the assessment.	The Applicant notes that the MCA is content that the NRA [APP-106, APP-107, and APP-108] is compliant with Marine Guidance Note 654, that the traffic data collected is valid and suitable, and that the consultation was suitable.

Applicants Ref	Theme	Key Paragraphs from WR	Applicant's Response
		Key and appropriate stakeholders were identified, and the MCA is content that suitable consultation took place via a hazard identification workshop and dedicated meetings. A completed MGN 654 Checklist has been provided as part of the NRA, and we are content the recommended NRA methodology process has been followed.	
REP2-046_b	Navigable Searoom	**Navigable Sea Room** The removal of the northern array is welcomed for avoiding unacceptable risks to navigation safety. The Red Line Boundary (RLB) of the southern array was changed post-PEIR as presented in Figure 1-1 of the NRA to avoid encroaching into the International Maritime Organization (IMO) adopted Precautionary Area and to increase the distance from two IMO-adopted Traffic Separation Schemes. Whilst these distances do not meet the guidance within MGN654 for mitigating collision and allision risks, a Structures Exclusion Zone (SEZ) is proposed to ensure no surface piercing or above-surface infrastructure will be installed within 1NM of the IMO-adopted traffic routeing measure boundaries. This has been agreed by MCA as a necessary mitigation measure for reducing navigational risks.	The Applicant can confirm that the Structures Exclusion Zone (SEZ) ensures that no surface piercing or above-surface infrastructure can be installed within 1nm of the IMO-adopted traffic routeing measure boundaries.
REP2-046_c	Proposed Mitigation	**Shipping and Navigation Mitigation Measures** In response to MCA and stakeholder concerns at the Hazard Identification workshop, PEIR and subsequent additional meetings, a Navigation Installation Plan (NIP) has been proposed by the applicant. This plan seeks to mitigate further any potential increases in the risk of collision in association with project vessels involved in cable laying works, especially in the Sunk Precautionary and Pilot boarding areas. We are content that the mitigation measures in Table 19.1 of the NRA and Table 15.3 of the Chapter 15 are relevant and appropriate and will serve to reduce identified risks to As Low As Reasonably Practicable (ALARP).	The Applicant notes that the MCA agree that the mitigation measures in Table 19.1 of the NRA [APP-107] and Table 15.3 of the Chapter 15 [APP-029] are relevant and appropriate and will serve to reduce identified risks to As Low As Reasonably Practicable (ALARP).
REP2-046_d	Galloper Recommended Ferry Route	**Galloper Recommended Route** The southern array overlaps an IMO-adopted routeing measure, known as the Galloper Recommended Route, which was established in 2007 for the ferries operating between Harwich Haven ports and Ostend. As per our response to the PEIR consultation and Relevant Representation, it will require agreement with relevant operators, ports and IMO member nations, in particular the Belgian maritime administration, to remove the Recommended Route as an IMO-adopted routeing measure. If agreement cannot be reached firstly at the UK Safety of Navigation (UKSON) committee (UK's navigation policy steering group), and subsequently by IMO members, MCA will not be able to support the proposed North Falls offshore wind farm development. Approval to remove the Galloper Recommended Route from the IMO must be received before any construction can commence. The applicant has conducted an additional navigation and environmental risk assessment on alternative routes vessels could take to Belgian ports. This assessment has been accepted and the Belgian maritime administration has indicated they could support the removal of the Galloper Recommended Route. If the project receives ministerial consent in Q1 2026, the proposal to remove the Recommended Route will be	The Applicant can confirm in line with the MCA Written Representation that the Belgian Maritime Authorities have accepted the Formal Safety Assessment [**REP2-025**] produced by the Applicant on the removal of the Galloper Recommended Ferry Route. As set out in the Applicant's response to Q15.1.11 [**REP2-020**], the Belgian Directorate General of Shipping confirmed on the 20th January 2025 that their "consultation on the FSA is closed and the result is positive". Discussions will be held with the MCA on next steps and to agree appropriate timelines.

Applicants Ref	Theme	Key Paragraphs from WR	Applicant's Response
		presented to UKSON in March/April 2026. If approved by UKSON, the proposal will be submitted six months (December 2026) before the Experts Group on Ships Routing at the International Maritime Organisation's (IMO) sub-committee on Navigation Communication Search and Rescue (NCSR) in May/June 2027. If the Experts Group agrees to the removal of the Recommended Route, the proposal will be submitted to the subsequent Maritime Safety Committee (MSC) 114, to be held in May 2028. Once accepted by MSC the removal of the Recommended Route will be in force within 4-6 months, therefore the earliest this can be expected is Q4 2028. It is our position that a condition of consent must be included within the DCO/DML to ensure that no offshore construction that directly interacts with the Galloper Recommended Route can commence before the removal is in force.	
REP2-046_e	Existing and Future Case Safe Navigation – Cable Burial	**Cable Routes and Cable Protection** The export cable route and cable protection plans will need particular focus owing to the large volume of traffic including deep draft vessels in the Sunk Outer and Inner Precautionary Areas, the Sunk Pilot Boarding Station and channels that have a charted maintained depth. Where burial depths as informed by the Cable Burial Risk Assessment (CBRA) cannot be achieved in the maintained depth channels any potential reduction in surrounding depths referenced to Chart Datum will need special attention and further consultation with the MCA and relevant stakeholders. Any consented cable protection works must ensure existing and future safe navigation is not compromised. It is noted in the Glossary of Chapter 15 (APP-029) that the offshore substation platform(s) will contain High Voltage Alternate Current (HVAC) equipment which is not expected to have an impact on electro-magnetic fields and ships' magnetic compasses. It is also noted that connection to a third-party High Voltage Direct Current (HVDC) cable(s) and a platform may be necessary. There is a potential impact on ships compasses from the electro-magnetic field generated from HVDC cables and a pre-construction compass deviation study may be required on the expected electro-magnetic field. Should this go ahead, we would be willing to accept a three-degree deviation for 95% of the cable route. For the remaining 5% of the cable route no more than five-degree deviation will be attained. MCA welcomes the preparation of a navigation Installation Plan (NIP) for the offshore ECC in consultation with local ports and operators. Given the traffic density and depths constraints within the area this document will help in carefully managing the cable installation risks. While drafting this document, details including navigational constraints and common practices of routeing and pilotage operations in heavy weather should be considered. It is expected that through the Cable Specification and Installation Plan (CSIP), the CBRA, preparation and review of a NIP, and continued consultation with stakeholders, the applicant will address these concerns.	The Applicant is working with Interested Parties to ensure burial depth is acceptable when considering future case vessel draughts.
REP2-046_f	Draft DCO	**Section Draft Development Consent Order (DCO) (APP-005)**	<u>Structure Exclusion Zone</u> As noted by the MCA, dDCO Schedule 1 Part 3 includes an 'Obstacle free zone for navigational safety'. The Applicant confirms that the co-ordinates demark an exclusion

Applicants Ref	Theme	Key Paragraphs from WR	Applicant's Response
			zone which ensures that all surface piercing infrastructure, inclusive of wind turbine blade tips, will be located at least 1nm from the Outer Precautionary Area, and Sunk TSS South and Sunk TSS East. This commitment is already adequately secured by Schedule 1 Part 3 Section 29 of the draft DCO and no further amendment is required. Deemed Marine Licences The Applicant is considering the amendments sought by the MCA in respect of the DMLs contained in Schedules 8, 9 and 10 of the dDCO and will provide an update at Deadline 4.

3.6 Applicant's Response to National Grid Electricity Transmission Plc - Written Representation [REP2-047]

Applicants Ref	Theme	Key Paragraphs from WR	Applicant's Response
REP2-047_a	Protective provisions and relevant agreements	Written Representation of NGET (National Grid Electricity Transmission Plc) in respect of the North Falls Offshore Windfarm DCO (the "Project")	The Applicant notes the comments.
REP2-047_b	Protective provisions and relevant agreements	Overlap between Projects – Co-operation Agreement	The Applicant agrees with the comments from National Grid Electricity Transmission PLC regarding the Tripartite Position Statement and the continuing negotiation regarding the Co-operation Agreement.
REP2-047_c	Protective provisions and relevant agreements	Sea Link	The Applicant is engaged with Sea Link in regards an agreement on the current overlap, and the next steps required.

3.7 Applicant's Response to Network Rail Infrastructure Limited - Written Representation [REP2-055]

Applicants Ref	Theme	Key Paragraphs from WR	Applicant's Response
REP2-055_a	Protective provisions and relevant agreements	Network Rail notes that it has provided its standard protective provisions to the Applicant which it states have been widely incorporated in other DCOs and which provide the necessary protections for Network Rail's statutory undertaking. Network Rail states that its standard protective provisions ensure that the Applicant does not exercise any rights under the DCO until the necessary agreements and consents are in place. Network Rail states that the current protective provisions included at Schedule 14, Part 5 of the draft DCO do not adequately safeguard Network Rail's rights or operational land. Network Rail lists certain differences between the standard form protective provisions provided by Network Rail and the protective provisions currently contained in the dDCO. Network Rail lists the agreements that it considers will be required to facilitate the relevant works affecting Plots 4-010, 4-013 and 4-014 (as part of the Authorised Development) including (i) Network Rail's standard protective provisions; (ii) property agreement(s); (iii) asset protection agreement(s); and (iv) a framework agreement.	The Applicant notes Network Rail's comments on its preferred form of protective provisions. Network Rail provided the Applicant with its preferred form of protective provisions and a draft Framework Agreement in February 2025 which the Applicant is currently reviewing. Network Rail's requirements relating to agreements needed to facilitate works that may affect its land or the national rail network are reflected in that document. The Applicant will continue to engage with Network Rail and negotiate the protective provisions and Framework Agreement and anticipates that parties will be able to reach agreement before the end of Examination.

Applicants Ref	Theme	Key Paragraphs from WR	Applicant's Response
		Network Rail states that it is liaising closely with the Applicant to enter into private agreements to govern the carrying out of the proposed works. It further notes that without the aforementioned agreements and satisfactory protective provisions being in place Network Rail considers the Proposed Development, if carried out, would have a detrimental impact on the safe, efficient, and economic operation of the railway and in accordance with its Network Licence and Network Rail would be unable to withdraw its objection to the DCO.	
REP2-055_b	Application of s 127 and s 138 of the Planning Act 2008	Network Rail explains why it is not content to rely on the protective provisions for the protection of Network Rail currently contained in Schedule 14, Part 5 of the draft DCO (as updated at Deadline 3). In relation to the application of section 127(5) and (6) of the Planning Act 2008, Network Rail states that the works proposed to install six permanent ducts with four carrying a single-phase cable and the other two ducts carrying a single and two additional optic cables under the railway will impede Network Rail's ability to ensure the continued safe, efficient and economical operation of the operational railway, if the works are carried out with the necessary procedures in place. As such Network Rail requires robust Protective Provisions and protections in additional agreements as discussed above. Network Rail raises concerns about the use of compulsory acquisition powers over Network Rail's apparatus and argues that there is a lack of sufficient safeguards to make sure that the removal or relocation those rights or apparatus will not impair Network Rail from carrying out its statutory functions It argues that given the national significance of the railway network, Network Rail requires the inclusion of their standard provisions to ensure compliance with its licence conditions. Without the relevant provisions, Network Rail does not consider that the draft DCO as currently drafted satisfies the requirements of sections 127 and 138 of the Planning Act 2008, and consequently, compulsorily powers should not be exercised without further safeguards being incorporated.	As noted in REP2-055_a, the Applicant will continue to negotiate bespoke protective provisions and the Framework Agreement with Network Rail which it anticipates will be agreed before the end of Examination. The Applicant has been liaising with Network Rail in respect of required land rights since November 2022. Draft Heads of Terms were issued to the landowner for review on 15 July 2024 and discussions on the terms have been ongoing. The Applicant was notified that Business clearance had been approved on 13 November 2024 and was informed on 11 March 2025 that Technical clearance had also been granted enabling negotiation of the voluntary land agreement to progress. Please refer to section 10.3 of the Statement of Reasons [**AS-028**] for information about the Applicant's position in respect of the application of the tests under section 127 and 138 of the Planning Act 2008. The Applicant is seeking to agree protective provisions (and other agreements as required) with each affected statutory undertaker including Network Rail so that any representations can be withdrawn. The Applicant will, if representations are outstanding towards the end of the Examination, set out its case as to how the relevant tests have been satisfied.

3.8 Applicant's Response to Port of London Authority - Written Representation [REP2-056]

Applicants Ref	Theme	Key Paragraphs from WR	Applicant's Response
REP2-056	n/a	n/a	The Applicant will respond to the full PLA Written Representation [**REP2-056**] in further detail at a future Deadline. Preliminary responses to the PLA Written Representation summary [**REP2-057**] are provided in Section 3.9. Any failure by the Applicant to respond at this stage to a particular point made by LGPL should not be taken as acceptance of that point by the Applicant.

3.9 Applicant's Response to Port of London Authority - Written Representation Summary [REP2-057]

Applicants Ref	Theme	Key Paragraphs from WR	Applicant's Response
REP2-057_a	Future Case Vessel Size	It is therefore critical that the existing and future capacity and operation of the Port are not compromised during construction and operation of North Falls Offshore Windfarm ("NF"). For the reasons highlighted in its Written Representation the PLA is concerned that NF may cause economic disbenefits to the Port. To accommodate existing and predicted future vessel sizes, the PLA needs to safeguard access via the deep water routes ("DWRs") for vessels with a draught of 20m. In the event that is it not possible for vessels of this size to enter the port via the DWRs, it will limit the quantum of trade within the Port. The impact of this restriction could be significant, detrimentally impacting the future of the UK's largest port. **[Paragraph 2.3]**	The Applicant can confirm that the NRA [**APP-107**] has considered a potential increase in vessel draught of up to 20m as a worst case within a future case scenario. This was based on feedback from stakeholders including PLA during NRA consultation and the hazard workshop.
REP2-057_b	Impact on Deep Water Routes	The offshore cable corridor ("OCC") Work No. 3 passes through the Sunk and Trinity DWRs – the main DWRs into the Port of London. There is no alternative approach available for larger vessels to access the Port of London. **[Paragraph 4.1]**	The Applicant notes that PLA states there is no alternative to access the Port of London other than the Trinity and Sunk DW routes, however the Applicant understands that for a temporary period during the period of the base case scenario, either route could be in used in isolation. Discussions with ports are ongoing on this topic, and the outline Navigation and Installation Plan [**APP-259**] will ensure any temporary disruption is managed.
REP2-057_c	Cable Crossings	Existing and proposed cables will either need to be crossed by NF (e.g Neuconnect) or NF will be crossed by in the future (e.g. Sealink). The depth of the NF cables where they cross the DWRs; the approach to cable laying and repair; cable protection and cable crossings are therefore all critical if the DWR's into the Port are not going to be impacted by NF. **[Paragraph 4.2]**	Currently, within the North Falls export cable route RLB, there are no cables in situ. The current crossings known about are Neuconnect, SeaLink and Five Estuaries. The potential location of crossings has been indicatively identified in 9.17 Export Cable Crossing Zone Plan **[REP1-059]**. As none of these projects are in the ground, potential areas have been identified based on RLB's and other known information from the respective projects. Final locations are to be confirmed. Given the locations of these crossings, none of these are within the vicinity of the DWRs (Sunk DW and Trinity DW). A meeting is proposed to discuss the crossing of the DWRs with the Port of London on 19th March 2025.
REP2-057_d	Burial Depth	There are areas of the OCC where certainty is required at this stage on cable burial depths, cable protection and cable crossings to ensure that there will be no significant effects on shipping and navigation arising from the OCC, in isolation or cumulatively with other projects, during construction, operation, maintenance and decommissioning. The cables would need to be installed and maintained within the OCC at a depth that would allow for the Trinity and Sunk DWRs to be dredged and deepened in the future to a depth of at least 22m below CD. This should be secured through a design requirement and a certified plan and an outline cable specification and installation plan should be produced and submitted to the examination which sets out information in relation to cable installation and maintenance, cable crossings, cable protection and temporary works. **[Paragraph 4.3]**	The Applicant recognises the importance of maintaining vessel access to key local ports through appropriate cable burial and consideration of the potential for increases in vessel draught in the future. Technical discussions are currently ongoing internally to understand what is technically achievable in terms of burial depth over and in proximity to the DW routes (this includes the area in proximity to the Sunk pilotage), noting the ports' position that burial should be such that a dredged channel depth of 22m is achievable in the future. A meeting has been arranged with the PLA on the 19th March to discuss this further.
REP2-057_e	Pre Construction Surveys	The PLA would want to be consulted on any surveys or monitoring or pre-construction activities that could affect the DWRs because a survey vessel may pass slowly over the DWRs or even stop to place/remove monitoring equipment which could affect shipping. Equally, restrictions may need to	The Applicant has raised potential survey work with the PLA via the Sunk Users Group meeting in January 2025, and will discuss this further with the PLA at a meeting on the

Applicants Ref	Theme	Key Paragraphs from WR	Applicant's Response
		be placed on how the pre-construction activity can be undertaken e.g. a boulder or archaeological find cannot be relocated to or within a DWR but must instead be removed. This would accord with the PLA's protective provisions for VE. VE has also committed in their oCSIP to any relocation of boulders, UXO or archaeological finds being carried out outside the DWR. **[Paragraph 4.8]**	19th March 2025. The PLA will be consulted on any pre construction surveys prior to their occurrence.
REP2-057_f	Relocation of Boulders or Archaeological Finds	The PLA would want to be consulted on any surveys or monitoring or pre-construction activities that could affect the DWRs because a survey vessel may pass slowly over the DWRs or even stop to place/remove monitoring equipment which could affect shipping. Equally, restrictions may need to be placed on how the pre-construction activity can be undertaken e.g. a boulder or archaeological find cannot be relocated to or within a DWR but must instead be removed. This would accord with the PLA's protective provisions for VE. VE has also committed in their oCSIP to any relocation of boulders, UXO or archaeological finds being carried out outside the DWR. **[Paragraph 4.8]**	The primary means of cable routing is to avoid boulders, UXO and archaeology, to avoid the need for any mitigation/moving of items of interest. Where items cannot be avoided and thus need to be moved/made safe, this will depend on location and item found. For UXO, this will be a separate marine license, and for boulders, this will be as per the post consent cable specification and installation plan. The final requirement will depend on the areas agreed for the Deep Water Routes, with further discussions on this happening on the 19th March, where proposed updates of documents will be proposed.
REP2-057_g	Deposits of Dredged Material	In order to install the cables within the OCC it will be necessary to dredge. The Marine Licence allows for up to 3,019,856 cubic metres of inert material to be deposited within Work Nos. 2 to 4A. This means that it could be disposed within Work No 3 (the OCC). There is a concern about a lack of controls in relation to the placing of inert material within the OCC and the implications of this for navigable depths at the DWR. **[Paragraph 4.9]**	The Applicant will produce an Outline Sediment Disposal Management Plan to indicate constraints on sediment disposal. This will be produced once an agreement with the ports has been agreed as to the exact areas required by the Deep Water Routes. A meeting on this is proposed for the 19th March, and the documents will be created afterwards.
REP2-057_h	Mitigations	MITIGATING POTENTIAL IMPACTS TO SHIPPING AND NAVIGATION To mitigate potential impacts to shipping and navigation, the Applicant places a significant amount of weight on documents, which will be produced post consent. These include: (a) Detailed cable burial risk assessment ("CBRA") (b) Development of, and adherence to, a Cable Specification and Installation Plan ("CSIP") (c) Navigation and Installation Plan ("NIP") **[Paragraph 5.1]**	Documents, or documents containing similar scope to those proposed, will be produced by the Applicant post consent. Such documents will be submitted to the relevant stakeholders for approvals.
REP2-057_i	HDD and PLA Radio Link	The PLA set out in detail in its Relevant Representation (RR-272) its concerns about the potential impacts of the vessels required to undertake the horizontal directional drilling at landfall interfering with the PLA's radio link and lowering its reliability. At this stage this matter has not been addressed, and the PLA maintains its position that this matter could be addressed through protective provisions. **[Paragraph 6.1]**	As set out in the Applicant's response to PLA's Relevant Representation (see PLA-17 and PLA-18 in [REP1-045], the Applicant would expect that any impact is very unlikely (as PLA acknowledged in its RR), noting that the southern extent of the landfall of the Offshore ECC is located 1km northeast from Holland Haven. The Applicant will engage further with the PLA in respect of this point.
REP2-057_j	Comments on the draft DCO Wording	COMMENTS ON THE DDCO The PLA is currently engaging in the Examination of VE which has raised similar issues to those set out in the PLA's Written Representation. The PLA and VE have made substantial progress to resolve many of these issues although some points of disagreement on exactly how these are	The Applicant notes that no land or apparatus which PLA owns, or in which it has an interest, would be subject to compulsory acquisition and no such land/interest or apparatus of PLA is identified in the Book of Reference [**REP2-009**]. The Applicant further notes, as acknowledged by PLA in its WR, that no part of North Falls is within

Applicants Ref	Theme	Key Paragraphs from WR	Applicant's Response
		secured remain. These representations and recommendations for the way forward are consistent with the approach taken to VE. The PLA has identified several matters of concern in relation to the dDCO as follows: (a) Article 2 (Interpretation) definition of Commence - The PLA would want to be consulted about any surveys or monitoring that affect the DWRs in line with the process for the VE surveys and monitoring that affect the DWRs. The definition of commencement would not be appropriate for such provisions. (b) Article 2 (Interpretation) definition of maintenance - The definition of maintain is broad and includes adjusting and altering. In the context of the export cable works to adjust or alter could result in a change in location and/or depth which would not be acceptable to the PLA. (c) Article 5 (Benefit of the Order) - The PLA would, in line with the position agreed at VE, expect within its protective provisions to contain a requirement for the undertaker to notify the PLA in writing within 7 days of any sale, agreement or other transaction under Article 5. (d) Schedule 1 Part 3 Requirements - Akin with VE and in recognition of multiple interested parties view on the future use of the DWRs, the PLA would wish to see a requirement and associated certified plan to the effect of: "The undertaker must ensure that in the design, implementation, operation and maintenance of the authorised development and ancillary works, a dredged depth of the Deep Water Routes to a depth of 22 metres below Chart Datum is not precluded or impeded." ("the Requirement") (e) Schedule 11 Deemed Marine Licence Transmission Assets - Whilst the PLA would expect its own approvals, the PLA had a number of broad comments as set out in its Witten Representation on the Deemed Marine Licence. **[Paragraph 7.1 and 7.2]**	the PLA's Jurisdictional Limits set by the Port of London Act 1968 or the London Pilotage District Limits. The Applicant's position is that Protective Provisions (**PPs**) are not necessary to safeguard PLA's statutory undertaking. The Applicant intends to submit a full response to PLA's submissions insofar as they relate to proposed PPs at Examination Deadline 4. The Applicant continues to engage with PLA on cable burial and other matters raised, and the parties have a further technical meeting scheduled for 19 March.
REP2-057_k	Protective Provisions	PROTECTIVE PROVISIONS The dDCO (REP1-011)) does not include any protective provisions for the benefit of the PLA. The PLA has appended the form of the offshore Protective Provisions that have been sought on VE to its Written Representation. Onshore Protective Provisions are also required. **[Paragraph 8.1 and 8.2]**	See response above.

3.10 Applicant's Response to National Trust – Written Representation [REP2-050]

Applicants Ref	Key Paragraphs from WR	Applicant's Response
REP2-050_a	The Trust has had initial discussions with the Applicant about these [auk compensation] sites, including their suitability. However, we have not seen any baseline survey work, including breeding and disturbance surveys. Any decline in species at these sites has not been quantified. Furthermore, we consider that some sites are not suitable for the delivery of compensation measures due the steep cliffs and being inaccessible. The proposed compensation measures set out in the abovementioned document focus on recreational disturbance. However, there is currently no evidence to demonstrate that recreational disturbance is a key factor in the decline of Guillemots and Razorbills in this area. There may be other factors at play, such as food availability, predation and extreme weather events. Therefore, we are not convinced at this stage that the suggested measures to reduce recreational disturbance are appropriate or adequate to address the problem.	The Applicant is planning surveys to inform post consent development of the Guillemot and Razorbill Compensation Implementation and Monitoring Plan (CIMP), in accordance with the Outline CIMP [**REP1-029**]. The level of detail provided in the Outline CIMP [**REP1-029**] and Guillemot and Razorbill Compensation Document [**REP1-027**] for the purposes of Examination and a consent decision is comparable with that required for other consented offshore wind farms, such as Dudgeon and Sheringham Shoal Extension Projects. Given the number of short-listed colonies and the small scale of effect to be compensated for, the Applicant is confident a suitable site and measure can be secured and delivered. It should be noted that accessibility of the cliffs does not negate potential for compensation, where recreational disturbance may still be relevant e.g. by rock climbers and surveys can be undertaken by boat. These factors will be considered in the post consent development of the CIMP, in consultation with the steering group. The Applicant is also in discussion with other developers and Cornwall Wildlife Trust regarding potential strategic delivery of the compensatory measure. A letter from Cornwall Wildlife Trust is provided in Document Reference **7.2.1.4**.

NORTH FALLS

Offshore Wind Farm

HARNESSING THE POWER OF NORTH SEA WIND

North Falls Offshore Wind Farm Ltd

A joint venture company owned equally by SSE Renewables and RWE.

To contact please email contact@northfallsoffshore.com

North Falls Offshore Wind Farm Limited Registered Address: Windmill Hill Business Park, Whitehill Way, Swindon, Wiltshire, SN5 6PB, United Kingdom

Registered in England and Wales Company Number: 12435947