

Application for North Falls Offshore Windfarm

Essex County Council (ECC) and Tendring District Council (TDC) Joint Response to ExQ3 issued on 1 July 2025

ExQ3	Question to:	Question:
1.	General and Cross-topic Questions	
2.	Agriculture and other land uses, ground conditions and soils	
3.	Alternatives and Site selection	
Q3.0.2	Applicant	<p>The Deadline 6 submission of Sir Bernard Jenkin MP [REP6-094] raises concerns in relation to the siting of the proposed new substation at Ardleigh, directly adjacent to the Dedham Vale AONB. In terms of site selection and alternatives for the substation site:</p> <p>(i) Please comment on the compatibility of the sub-station site with the advice set out in NPS EN-5 paragraph 2.9.19.</p> <p>(ii) Please also summarise the consideration given to the level of mitigation proposed to be provided in this location and the consideration of an alternative site further from the Dedham Vale AONB and its setting.</p>
Q3.0.2	ECC and TDC Response:	<p>i) No comment.</p> <p>ii) The Councils do not consider the level of landscape and visual mitigation, and compensation is commensurate with the scale of the proposed substation and concur with the Design Council advice identified in Applicant's Deadline 5 Document 2.3 Design Vision Rev 1 [REP5-044] that proposed planting should extend beyond the red line.</p>
4.	Aviation	
5.	Climate Change & Resilience	
6.	Compulsory Acquisition, Temporary Possession and Other Land or Rights Considerations	
7.	Cumulative Effects	
8.	Design	
Q8.0.1	Applicant, and IPs	<p>Good Design</p> <p>The Applicant confirmed in its response to ExQ2 8.0.1 [REP5-054] that changes would be made to the Design Vision [REP5-004] confirming that stakeholders and interested parties will</p>

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		<p>contribute to the design process. The ExA notes guidance on the matter is set out in the guidance note: Nationally Significant Infrastructure Projects: Advice on Good Design .</p> <p>A good design process includes a number of components including the following:</p> <ul style="list-style-type: none"> <i>a collaborative, multi-disciplinary approach including positive community and land rights engagement</i> <i>a succinct and ambitious vision for the project, underpinned by a clear analysis of the context for the place, its environment and the opportunities for creating social value, including for the local and wider economy</i> <p>(i) Please can the Applicant set out further information and practicalities for the arrangements to enable these components.</p> <p>(ii) Please can IPs provide views as to the arrangements either emerging or necessary in order for collaboration, community engagement and opportunities for creating social value.</p>
	TDC Response:	<p>(ii) Whilst North Falls (NF) and Five Estuaries (FE) are making efforts toward collaboration and community engagement, a succinct and ambitious overarching vision for the NF/FE projects—particularly in combination with the other Nationally Significant Infrastructure Projects (NSIPs) that will profoundly affect this area—remains conspicuously absent. At this late stage, neither the NF/FE applicants nor the affected communities and indeed the wider public have a clear understanding of the cumulative impacts of NF, FE, the Norwich to Tilbury corridor (including the EACN), and the Tarchon interconnector.</p> <p>As has been repeatedly stated, these projects are so deeply interlinked that they cannot realistically proceed in isolation. From the applicants’ perspective, it is effectively an “all or nothing” scenario. Therefore, a comprehensive and integrated analysis is urgently needed—one that sets out the broader context of place, environmental considerations, and the opportunities to generate social value, including benefits to both the local and wider economy across all four projects – it is very concerning that at this late stage this remains completely absent.</p>

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		<p>Meanwhile, affected communities remain on tenterhooks, particularly regarding the limited aspects of the NF and FE substations that they may still be able to influence. Although key information is said to be imminent, all current evidence suggests that the scope for meaningful community input will be minimal. This casts serious doubt on the effectiveness of the current approach to ‘good design’—especially given the scale and nature of the infrastructure involved. Substations of this kind, (we understand that both substations will be air cooled therefore making the terrestrial looking coils, springs and multiple iron structures highly visible) together with their large, box-like structures, are inherently harsh and alien in appearance. In open rural landscapes with long views and high visibility, there is very little that can be done to mitigate their visual impact. We have raised these concerns repeatedly.</p> <p>To ensure genuine and effective engagement, developers must urgently clarify which design elements are open to influence. More importantly, they must present a far more honest, compelling and transparent vision of the overall picture – the ‘end game’—not just in terms of design, but across all dimensions: noise levels, traffic movements, vibration, landscape impacts, and every other aspect that will affect local communities, and for all the NSIPs that are so interlinked.</p>
	ECC Response:	<p>(ii) Both Councils have repeatedly highlighted that the development, together with other nearby NSIP projects will completely transform the rural agrarian and open character of the substations site. A collaborative approach is essential to ensure that all the live and forthcoming DCOs within the locality contribute to a common vision of place-making, taking into account the local context, environment as well as opportunities arise to create social value while achieving a good design. Due to their close proximity and functional reliance with the grid, such a collaborative, multi-disciplinary approach should not be only limited to the design and construction stages, but also necessary to extend to operational and decommissioning stages.</p> <p>Monthly design meetings are now in place between the applicant of North Falls and Five Estuaries and both Councils to keep track of the design progress. We are pleased that the applicant agreed and started engaging with the Essex Quality Review Panel (EQRP) for an independent design review.</p>

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		<p>The Councils would like to stress that the following are critical in order to achieve a good design for the development:</p> <ul style="list-style-type: none"> the Coordination Report should be listed as a certified document within the DCO to ensure that the applicant continues to work collaboratively with other nearby NSIP applicants and partners; continual and genuine means for the local authorities and local communities to get involved and <u>able to influence</u> (our highlight) throughout the design process; the emerging Joint Design Guide for the onshore substations for Five Estuaries and North Falls should not simply be a tender document for appointment of contractors; The Joint Design Guide should be supported by background paper(s), providing details on assessment of the local context, possibilities, alternatives as well as justifications for any discounted options.
Q8.02	Applicant, ECC	<p>Good Design – Essex Quality Review Panel (EQRP)</p> <p>Please confirm progress towards the EQRP site visit scheduled for 2nd July 2025, as referenced in [REP5-054] response to ExQ2 8.0.1, and update on progress for information days regarding design and joint design.</p>
	ECC & TDC Response:	<p>EQRP site visit and first meeting took place on the 2 July 2025. In discussions with the applicants of both windfarms, the following timeline for the Joint Onshore Substations Design Guide is as follows:</p> <p>Phase 1 engagement: Monday 18 August to Monday 29 September 2025 (6 weeks)</p> <p>Public Information Day: first week of September 2025</p> <p>Phase 2 engagement: Monday 13 October to Monday 24 November 2025 (6 weeks)</p> <p>Presentation of final design guide: December 2025</p>
Q8.03	Applicant, ECC	<p>Good Design – Design Champion</p> <p>The ExA notes that a Design Champion will be appointed in due course. A design champion is one of the component of a good design process set out in Nationally Significant Infrastructure</p>

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		<p><u>Projects: Advice on Good Design</u>. Their role is within design leadership, and the design champion ensures “<i>design governance is secured and the design principles drive a structured design process and hierarchy of design control</i>”.</p> <p>Please can the Applicant provide further consideration to the timeline for the design champion’s appointment. and confirm that this will allow sufficient time to assist with the discharging of Requirements 5 and 6 of the dDCO.</p>
	ECC & TDC Response:	For the applicant to address.
Q8.04	Applicant, and IPs	<p>Joint Design Guide, Design Vision and Hedgerows</p> <p>The ExA notes that the Joint Design Guide is currently being developed by NFOWF and VEOWF, and it is expected to address the relationship to various other elements: roads, ditches, planting etc.</p> <p>The Design Vision [APP-234] has now been updated as [REP5-004]. At the onshore substation, the Design Vision considers that reinstatement of historic field boundaries will strengthen the historic landscape character, and planting along existing layers of natural screening to maintain the agrarian landscape.</p> <ul style="list-style-type: none"> i) Please provide a current update regarding the Joint Design Guide as close to Deadline 7 as to the current stage this is at, as well as a timeline envisaged for completion. ii) Please can the Applicant (and other IPs, optionally) comment on the scope of this joint guidance to consider the requirement for wider (up to 12 metre hedge openings). iii) Regarding the Design Vision, please explain whether or not wider access points (up to 12 metres) would affect the agrarian landscape. iv) Noting ECC’s comments that ECC welcomes the proposal of a Joint Design Guide but has concerns as to the extent and character of the proposed landscape strategy, please comment on how concerns that a wider vision for landscape is required, and how could be addressed in the Joint Design Guide.
	ECC & TDC Response:	<p>(i) Please see our response to Q8.0.2 above for the update.</p> <p>(ii) It is unclear why openings of this scale are needed in the agrarian landscape as it appears far greater than the width of vehicles and loads allowed on the highway. The Councils note that the width of both Grange Road and Ardleigh Road as two examples in the local area is less</p>

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		<p>than 3 metres. Openings of this size would cause a significant reduction in landscape structure and pattern, in visual unity and screening functions of a more intact hedgerow. It would also reduce green infrastructure and ecosystem connectivity. The Design Guidance should set quantifiable parameters that restrict hedgerow openings to the maximum required for normal agricultural operation in all hedgerows conserved, enhanced or recreated as part of the landscape and visual mitigation and /or enhancement for the substation.</p> <p>(iii) See point made at ii) above.</p> <p>(iv) The Councils consider the level of landscape and visual mitigation and compensation should be commensurate with the scale of the proposed substation, as identified by the Design Council in their advice identified in Applicant's Deadline 5 Document 2.3 Design Vision Rev 1 [REP5-004], that proposed planting should extend beyond the red line. We propose that some principles are identified within the Design Guide as to the scope and nature of an extended landscape strategy (e.g. restoration of hedgerows along the adjoining PRoW), identifying parameters for its extent, timing and delivery. These parameters should be drawn up in partnership with The Councils and in consultation with the local parishes.</p>
9. Draft Development Consent Order (DCO)		
9.0 Articles Part 2 – Principal Powers		
9.1 Schedule 1 Part 3 - Requirements		
Q9.1.1	Applicant, ECC	<p>Requirement 5 (Substation works)</p> <p>The ECC Deadline 4 submissions [REP4-073] requests that this requirement is renamed to align with the equivalent VEOWF requirement, namely, 'Onshore substation works and design'. The Applicant's Deadline 5 submissions [REP5-056] state that it does not propose to make this requested change to the title of requirement 5 because it is unnecessary and has no material impact on the effect of the provision.</p> <p>(i) Please can the parties indicate whether this matter has been agreed and resolved. If there are any objections to the change in title, please can the Applicant explain what they are?</p> <p>(ii) If the ECC still seek this amendment, please provide reasons.</p>
	ECC & TDC Response:	(i) This matter has not been resolved.

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		(ii) The Councils do not feel this is a material change but will provide clarity and consistency for the administering Authority as well as the local communities. ECC requests that as Five Estuaries and North Falls both move forward collaboratively on the joint onshore substation design, that Requirement 5 Substation Works is renamed to align with the equivalent VE DCO Requirement 5, i.e. 'Onshore substation works and design'.
Q9.1.2	Applicant, ECC	<p>Requirement 15 (Groundwater monitoring)</p> <p>The ECC Deadline 4 submissions [REP4-073] sets out proposed wording for Requirement 15 which reflects the drafting for the same requirement in the VEOWF dDCO. The dDCO submitted at Deadline 5 [REP5-009] includes an amended version of requirement 15. However, it does not entirely reflect the drafting sought by ECC at Deadline 4.</p> <p>(i) For the avoidance of doubt, please can the parties indicate whether the amended requirement 15 is agreed. If not, please provide reasons to support any variation.</p> <p>(ii) Should it be specified that the groundwater monitoring plan must include a timetable for implementation and require the plan to be implemented in accordance with the approved timetable?</p>
	ECC & TDC Response:	<p>(i) The Councils note that pre-commencement trigger is now included, however, sub-paragraph 3 should be included to require implementation in accordance with the approved details.</p> <p>(ii) Yes.</p>
Q9.1.3	Applicant	<p>Requirement 17 (Control of noise during operational stage)</p> <p>Is the intention to use the "Onshore substations operational noise and the outline noise complaints protocol" [REP5-036] as the basis for the "noise investigation protocol" referred to in requirement 17? In which case will the document name be changed to be consistent with requirement 17?</p>
Q9.1.4	Applicant, ECC	<p>Requirement 17 (Control of noise during operational stage)</p> <p>The ECC Deadline 4 submissions [REP4-073] sets out proposed wording for requirement 17(2) to reflect a collaborative complaint handling approach in the noise investigation protocol. The dDCO submitted at Deadline 5 [REP5-009] does not include specific reference to a collaborative handling approach. The Applicant's Deadline 5 submissions [REP5-056] indicate that it does not propose to make this change.</p>

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		<p>(i) Please can the Applicant provide further reasoning to support the drafting of requirement 17 without the inclusion of such a specific reference.</p> <p>(ii) Please can the ECC explain further the need for the amendment which they seek to requirement 17.</p>
	TDC Response:	<p>(ii) TDC have repeatedly set out their concerns in respect of the challenges around noise control, both during construction and during the operational stage, both individually and from an in-combination perspective. An effective, clear, unambiguous collaborative approach to a noise investigation protocol is the least that the applicants can sign up to and it is essential to be included in the dDCO.</p>
	ECC Response:	<p>(ii) Both Councils have repeatedly set out the importance of a joint noise complaint panel in order to deal with the unprecedented situation of co-location of 4 substations (including the existing Lawford substation in the vicinity), both during hearings as well as in our previous responses. This is a crucial element for consideration of the discharging authority and the suggested wordings help to clarify the expectation when discharging the requirement and to avoid further disputes.</p>
Q9.15	Applicant, SCC	<p>Proposed new Grampian requirement (SCC)</p> <p>The SCC at ISH1 [REP4-094] and [REP4-095] confirm that they seek a phasing requirements as set out in their LIR paragraph 7.3 [REP1-074]. The Applicant's response to ExQ2 9.1.13 [REP5-054] sets out in some detail its reasons for rejecting the imposition of such a requirement in this case. The SCC response to ExQ2 9.1.13 makes further submissions on this topic [REP5-117] and at Deadline 6 [REP6-092]. In the light of those submissions, the ExA seeks a response to the following points:</p> <p>(i) Does the Applicant agree that whilst Norwich to Tilbury is a critical national priority (CNP) that does not guarantee that it will receive consent and there are other factors to be taken into account as set out EN-1?</p> <p>(ii) Does the Applicant accept that plans for the EACN may change and that there is potential for the North Falls wind turbine generators (WTGs) to be installed for a significant period of time without being connected to the Grid?</p>

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ExQ3	Question to:	Question:
		<p>(iii) In the light of the submissions made by SCC at Deadline 5, does the Applicant accept that there is no need to establish an 'exceptional' basis for the requirement. If not, please explain why.</p> <p>(iv) In the light of the submissions made by SCC at Deadline 6, does the Applicant accept that the phasing restriction is necessary to follow the requirements of the mitigation hierarchy. If not, please explain why.</p> <p>(v) Notwithstanding the submissions already made on this matter, please can the Applicant explain in further detail its submission that the proposed requirement is not necessary to comply with the updated duty in section 85 Countryside and Rights of Way Act 2000.</p> <p>(vi) Notwithstanding the submissions already made on this matter, please can SCC explain in further detail why it regards the proposed requirement to be necessary to ensure that the project is designed sensitively and in accordance with the updated duty in section 85 Countryside and Rights of Way Act 2000.</p> <p>(vii) The SCC response to ExQ2 9.1.13 [REP5-117] bullet point 5 refers to the scope for amending the drafting of the requirement to ensure that the notification does not require formal approval. Please can SCC provide that alternative drafting for the proposed requirement.</p> <p>(viii) The Applicant draws support from the Recommendation Report in the Sheringham Shoal and Dudgeon Offshore Windfarm Extension Project paragraph 5.4.20. The ExA's comments in that case were in the context of the viability of the proposed grid connection rather than the potential for delay in the context of the section 85 duty. The Applicant is requested to explain further why the existence of the connection agreement provides a sound basis for the assertion that a phasing agreement for the reasons given by SCC would be unreasonable.</p> <p>(ix) The Applicant is requested to explain in detail its submissions in response to 9.1.13 (iv) in relation to the delay to construction timeframes that it submits would result from the imposition of the proposed requirement. What is the difference in impact on construction timeframes that would result from the requirement as opposed to any delay that might occur due to the timing of any consent for the EACN or other means of connection? Please provide further details of the long lead items referred to and why these need to be ordered prior to March 2027? How would the proposed phasing restriction alter the level of risk in making those commercial decisions?</p>

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		(x) The Applicant's submissions in response to 9.1.13 (vi) refer to landscape policies and the consideration of nationally designated landscapes in the Hinkley Point C area. However, in the case of the Hinkley Point C Connector the 8.5km section through the Mendip Hills Area of Outstanding Natural Beauty (AONB) consisted of underground cable. Does that have a bearing on the comparability of the factual circumstances of the Hinkley Point C case with this case?
Q9.1.6	Applicant, ECC, TDC	<p>Proposed new Grampian requirement (ECC, TDC)</p> <p>The ECC Deadline 4 submissions [REP4-073] sets out proposed wording for an additional phasing/Grampian requirement which they state is precededented in the recent Viking Carbon Capture and Storage Pipeline Order 2025. The Applicant's Deadline 5 submissions [REP5-056] states that it disagrees that the recent Viking CCS Carbon Dioxide Pipeline Order provides a precedent for the phasing requirement sought by ECC and TDC because the projects are not sufficiently similar and further details are set out in response to ExQ2 9.1.14. The ECC/TDC response to ExQ2 9.1.14 makes further submissions on this topic [REP5-091]. In the light of those submissions, the ExA seeks responses to the following points:</p> <p>(i) The Applicant's response to ExQ2 9.1.14 sets out what it states are key differences between the North Falls scheme and the current case including that the connection to the grid is not a part of the North Falls project that it is responsible for delivering. In relation to the existence of a commercial connection agreement with NESO, the Applicant's response to 3.0.2 (ii) states that no information is available as regards any alternative approach by NGET. Whilst the Applicant has maintained optionality in its design envelope for an offshore connection point a viable option that can deliver a connection for the NFOWF by 2030 has not been identified to date. Against that background, the parties are requested to comment on whether there is any realistic prospect other than the EACN connection that would enable the achievement of the 2030 date. In those circumstances, would the Grampian requirement proposed by ECC/TDC serve a legitimate purpose?</p> <p>(ii) Furthermore, given that background does the progress or otherwise of the National Grid's DCO application have any bearing on the Applicant's engagement with the supply chain and placing orders. What would be the effect of delay to that project on the progress and delivery of the North Falls scheme?</p> <p>(iii) As regards the Secretary of State's decision in the Viking CCS Carbon Dioxide Pipeline Project, the Applicant makes the point that the onshore and offshore works for that project</p>

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		<p>were all part of the Viking CCS project. Do ECC/TDC accept that this represents a key difference from the current case.</p> <p>(iv) The Secretary of State's decision in the Viking CCS Carbon Dioxide Pipeline Project paragraph 4.9 identifies the ExA's concern as being that the full benefits could not be realised until the entire CCS chain had been consented. Whilst the Applicant's points in relation to differences from the North Falls project are noted, as a matter of principle, is that concern not similar to the concern expressed by ECC/TDC in this case?</p> <p>(v) Please can ECC/TDC provide further justification for the inclusion of such a requirement in this case, in particular why they regard it as being necessary and reasonable to impose it.</p> <p>(vi) The Applicant in response to 9.1.14 (iv), disagrees with the statement and relies upon the NESO agreement to enable the North Falls project to connect to the grid via an alternative means if development consent for the EACN substation is not granted. The ECC/TDC response to 9.1.14 (i) asserts that if a DCO is not granted for the EACN substation, there will be no connection of the NFOWF to the grid and that EACN is currently the only option available to the project. The parties are requested to comment on the prospect of such an outcome and any alternative means of connection together with the implications that might have for the timing of the scheme.</p>
	TDC Response:	<p>(i) In response to the first question, TDC is firmly of the view that there is no realistic prospect of achieving the 2030 connection date other than through the proposed EACN connection in the area between Ardleigh and Little Bromley.</p> <p>Any alternative options—if they exist at all—are so unlikely to be deliverable within the required timeframe that it would be wholly irrational to consider them viable. On this basis, TDC maintains that the Grampian requirement proposed jointly by ECC and TDC serves a clear and legitimate purpose.</p> <p>(ii) This is for the applicant to respond to.</p>

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		<p>(iii) Yes, but it does not change the fact that NF and FE is wholly dependent of Norwich to Tilbury gaining DCO consent and that the proposed Grampian requirement merely seeks evidence of development consent being granted for National Grid's EACN.</p> <p>(iv) For the applicant to respond to.</p> <p>(v) The condition is considered necessary in order to secure clarity—specifically, evidence that development consent has been granted for National Grid's EACN substation—given the clear and direct interdependence between the projects.</p> <p>It would be both irrational and highly risky for the NF and FE projects to commence works without confirmed DCO approval for the Norwich to Tilbury project. The condition is also entirely reasonable: no responsible developer would proceed with a project of this scale while such a significant uncertainty—namely, an unconsented and fundamentally linked DCO—remains unresolved.</p> <p>To omit this condition would therefore be both unreasonable and irrational in the context of sound planning and the overall combined projects delivery which are so interdependent.</p> <p>(vi) There is currently no realistic alternative means of connecting to the Grid that would be operational within the required timescale—i.e., by 2030. TDC is of the view that, in the absence of such a viable alternative, the delivery of the various projects dependent on the EACN will face significant delays in achieving grid connection by 2030.</p>
Q9.1.7	The Applicant, ECC, TDC	<p>Other matters relating to DCO requirements</p> <p>The ECC/TDC in response to ExQ2 9.1.15 (vi) in relation to requirement 19, state that to give the public reassurance, it would be advisable to certify the latest Co-ordination Report in the dDCO.</p> <p>(i) Please can the Applicant indicate whether it agrees that this should be a certified document. If not, please give reasons.</p> <p>(ii) Please can ECC/TDC provide further reason and justification for the inclusion of the Co-ordination Report in the list of certified documents in Schedule 12 of the dDCO.</p>

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	ECC and TDC Response:	<p>The Councils notes that the Co-Ordination Report provides evidence of the coordination and collaboration undertaken by North Falls Offshore Wind Farm Ltd (NFOW) during the development of the North Falls project. It is also aiming to show how NFOW has worked with other NSIPs and stakeholders at both strategic and project levels and in support of NFOW's application for a DCO by seeking to demonstrate compliance with policy requirements related to coordination. It also aims to demonstrate how the project has been designed with consideration of other major infrastructure proposals in the region. It also seeks to demonstrate how coordination efforts aim to reduce environmental disruption and impacts on local communities and to promote efficiencies in infrastructure delivery and energy distribution.</p> <p>This report is the only over-arching document within the submission to insert responsibility upon the applicant to coordinate and collaborate with all the stakeholders. Therefore the Coordination Report should be listed as a certified document within the DCO to ensure that the applicant is committed and continues to work collaboratively with other nearby NSIP applicants and partners, during all stages of the development, from detailed design all the way to decommissioning.</p>
9.2	Schedules 8, 9 and 10 – Deemed Marine Licences under the 2009 Act	
9.3	Schedule 14 – Protective Provisions	
Q9.3.1	<p>Eastern Power Networks Plc, Environment Agency, Essex County Council, Five Estuaries Offshore Wind Farm Limited, Harwich Haven Authority, London Gateway Port Limited, National Grid Electricity Transmission, National Highways,</p>	<p>Protective Provisions</p> <p>With respect to negotiating Protective Provisions, advise on what the current position is with respect to agreeing a set of Protective Provisions in your favour with the Applicant. Where there is disagreement with the Applicant explain why that is the case and where any disagreement relates to matters of detailed drafting submit the version of your preferred text.</p>

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ExQ3	Question to:	Question:
	Network Rail, and Port of London Authority.	
	ECC Response:	ECC is content with the highway PPs, subject to agreement of the Framework Highways Agreement and/or other legal agreement(s).
Q9.32	ECC, Applicant	Protective Provisions With reference to ECC's SoCG [REP6-074] Item 2.7 Transport, point 10, could you provide an update in respect of the progress with agreeing the Framework Highways Agreement?
	ECC Response:	The applicants of both North Falls and Five Estuaries advised ECC that a side agreement could be agreed, however, given the tight timeframe of examination, it is acknowledged that a legal agreement could not be agreed at this stage. The applicant is proposing to secure some form of agreement by inserting text into the OCTMP, which the Highway Authority can agree in principle, subject to the exact wordings to be agreed and submitted at Deadline 8.
10. Ecology/Biodiversity/BNG/HRA		
Q10.0.5	The Applicant NE IPs	Compensation – Schedule 15 wording It is the RSPB's view compensation measures should remain in place for as long as the project's adverse impacts on the SAC/SPA/Ramsar site continue. Typically, they state this has needed to be "in perpetuity" as impacts have been permanent. The lifetime of the development wording as proposed by the Applicant within Schedule 15, paragraph 8 in [REP3-008] may need to be adapted. (i) Applicant/NE – Should the length of time the compensation measures the DCO secures for this project be based on the combination of the lifetime of the development plus the time it will take the affected bird population to recover from the impacts? (ii) Applicant - Please provide your updated preferred without prejudice draft wording for Schedule 15 to cover (i). (iii) IPs make whatever comment you deem necessary.
Q10.0.5	TDC Response:	No further comments, will defer to NE to consider.

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ExQ3	Question to:	Question:
Q10.0.7	NE MMO NatureScot RSPB Essex Wildlife Trust Tendring Council The Applicant	Report on the Implications for European Sites (RIES) The ExA notes that the Report on the Implications for European Sites (RIES) was published 1 July 2025. The ExA requests that the series of questions featuring within the RIES are answered by the relevant parties. The questions within the RIES detail to whom each question is asked. All responses must be submitted by no later than Examination Deadline 7 which is 15 July 2025 .
Q10.0.7	TDC Response:	No further comments, will defer to NE and MMO etc. to consider and respond to.
11. Flood Risk, groundwater and surface water		
Q11.01	Environment Agency, ECC	Groundwater Risk Assessment and Management Plan The ExA notes the inclusion of the GRAMP in four parts [REP5-049 to REP5-052]. Please can the Environment Agency and LLFA confirm that this submission is to their satisfaction.
	ECC & TDC Response:	LLFA considered that the information provided is sufficient at this time, it should be explored in the drainage strategy if infiltration is a viable option for dealing with surface water at the sub-station.
Q11.02	Applicant, Environment Agency	Statement of Common Ground with Environment Agency The ExA notes that Item 3 of the SoCG has been updated to reflect the OHDD Method Statement and Construction Plan, based on discussions with the Environment Agency (and Natural England). The Environment Agency [REP5-088], however, has stated that it has not been contacted (as at Deadline 5). Please can both parties update on whether or not the EA's comments have now been incorporated to the satisfaction of both, and the position agreed.
Q11.03	Environment Agency	SoCG: Environment Agency position on Haul Roads SoCG Item 4 [REP5-076] suggests that the Haul Road Crossings (ref WX22A and WX23) are now agreed. Please can the Environment Agency expand or confirm as applicable.
Q11.04	Applicant	SOCG: Environment Agency - Bridges and Culverts In response to ExQ2 Q11.0.5 the EA has confirmed the adequacy of updated datasets submitted as [REP4-032] and [REP4-033]. At Appendix 2 of [REP5-088] the Environment

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ExQ3	Question to:	Question:
		Agency recommends that culverts are able to contain the 1% annual probability of flow + climate change. Further, that expansion to the bridge and culvert will be temporary at point 63, and subsequently reinstated. Please can the Applicant confirm these points.
12. Historic Environment & Archaeology		
Q120.1	Historic England, ECC	Archaeological Mitigation Strategy and Written Scheme of Investigation Please can HE and ECC confirm that they are now in agreement with the AMS (9.65 Archaeological Mitigation Strategy (Rev 0) Parts 1 to 3 [REP5-046 to REP5-048]) and 7.12 Onshore Outline Written Scheme of Investigation (Rev 1) Parts 1 to 3 [REP5-016, REP5-018, REP5-020]. Other IPs may, optionally, comment.
	ECC & TDC Response:	ECC are in agreement with the submitted Archaeological Mitigation Strategy and the Outline Written Scheme of Investigation.
Q120.2	Applicant. IPs	Public Benefit NPS EN-5, para 2.2.10 requires that public benefits should outweigh harm to heritage assets. Please can the Applicant elaborate on the public benefits which it considers will outweigh any harm. IPs are invited to comment.
	ECC & TDC Response:	The Councils will comment on the Applicant's response at Deadline 8.
Q120.3	Historic England, ECC. Other IPs, optionally.	Requirement 11 – Alignment with VEOWF The ExA notes that the Applicant states that Requirement 11 of the dDCO [REP5-008] now aligns with that of the equivalent for VEOWF. Please can Historic England and ECC (or other IPs, optionally) confirm that they have reviewed and are in agreement.
	ECC & TDC Response:	ECC have reviewed and are in agreement with the applicant that Requirement 11 of the dDCO is now in alignment with that for VEOWF.
Q120.4	Applicant, Historic England	Statement of Common Ground – Historic England The ExA notes that within the SoCG submitted at Deadline 5 [REP5-084], items 2,3 and 8 of the offshore impact, and item 2 of onshore impact, remain in discussion. Please can the Applicant and HE provide a further update in light of any changes following submission of the OOWSI and AMS.

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ExQ3	Question to:	Question:
Q12.05	ECC, Historic England	<p>Temporary Effects</p> <p>ECC has stated that [REP5-090] significant effects arise from the construction works to several heritage assets along the Onshore Cable Route. ECC refers to: Ring Cottage and Tudor Cottage; Barker's Farmhouse; Hempstall's Farmhouse; Church of St Mary; Hannams Hall; The Old Rectory. ECC also stated that, following mitigation, Ring Cottage and Tudor Cottage would remain experiencing significant effects, and that the ExA is advised to take these into account when making a recommendation to the Secretary of State.</p> <p>The ExA notes that ES Chapter 26 Noise and Vibration [APP-040] concludes a negligible to minor adverse residual effect following embedded and additional mitigation, including for Ring Cottage and Tudor Cottage. Mitigation measures are set out in the OCoCP [REP5-022] and are secured via DCO Requirement 8 – Code of Construction Practice [REP5-008]. ECC's view appears to take the effects before the application of noise mitigation which would be secured by DCO Requirement. Please can ECC confirm whether or not, in its view, Ring Cottage and Tudor Cottage would remain experiencing significant effects following mitigation. Historic England is also invited to comment should they wish.</p>
	ECC & TDC Response:	<p>ECC have reviewed the mitigation measures that are set out in the OCoCP [REP5-022] which are secured by DCO Requirement 8 – Code of Construction Practice. The mitigation measures appear to largely relate to noise mitigation, opposed to vibration. However, it is noted in DCO Requirement 18 that protective works to buildings will provide sufficient mitigation for any potential vibration effects. ECC is satisfied that temporary effects can be sufficiently mitigated.</p>
13.	Human Health	
14.	Landscape and Visual	
Q14.0.1	Applicant	<p>Visual Mitigation at Substation</p> <p>The ExA notes the update to 9.30 Indicative Planting cross-sections at the onshore substation (Rev 2) [REP5-035] at Deadline 5. This confirms that planting would not be orchard planting but a series of woodland belts.</p>

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ExQ3	Question to:	Question:
		<p>i) Please can the Applicant elaborate, setting out timescales to maturity and at what point the screening will have taken full effect.</p> <p>ii) With regard to the Written Landscape Scheme, could the OLEMS clarify the details of trees, woodland and hedgerows, finished ground levels and bunding, and plant details including, where possible plant schedule will also be provided as drawings to illustrate the written details. Could boundary treatments also be included on the drawings for clarity.</p>
	ECC & TDC Response:	<p>i) The Councils understand that the applicant has estimated that the woodland/shelterbelt planting will reach approximately 6-8m after 15 years. The Indicative Planting cross-sections at the onshore substation (Rev 2) [REP5-035] and the visualisations supplied with the ES demonstrate that the proposed planting never fully conceals the substation.</p> <p>ii) The Councils are concerned that without appropriate scaled drawings being required to associate with the Final LEMS, the full intention of the proposed landscape strategy and its successful implementation at the delivery stage cannot be guaranteed.</p>
Q14.02	Applicant	<p>Screening at Substation: VEOWF</p> <p>REP4-038 (10.20.8 Technical Note - Screen planting options for Land Plot 17-024) submitted to the VEOWF Examination (see [REP4-038]) provides indicative cross sections to illustrate the potential mix of screening planting, as well as how this might mature over 5, 10 and 20 years. The planted woodland areas would screen the onshore substation, and provide a landscape feature. Please can the Applicant provide commentary on principle differences between the VEOWF proposals and those of NFOWF, and what further steps can be taken to align them.</p>
	ECC and TDC Response:	<p>Our understanding is that VEOWF and North Falls are in the process of aligning their proposals along the spatially broader lines of VEOWF landscape strategy, which we welcome. However, we would urge both parties to seek further enhancements in the wider landscape, particularly along the PROW to the north of the site, to provide landscape and visual mitigation and further the landscape and GI benefits.</p>
Q14.03	Natural England, Applicant and Local Authorities	<p>Natural England Risk and Issues Log: Landscaping and Outline Landscape and Ecological Management Strategy (OLEMS)</p> <p>Natural England states in its Risk & Issues Log [REP6-089] that it expects “<i>the landscaping requirements to also cover survey methods, monitoring requirements and the requirement to</i></p>

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ExQ3	Question to:	Question:
		<p><i>maintain, including the potential for re-planting due to plant failures. Further, we would expect to be consulted on the plans prior to their approval by the relevant LPA".</i> The ExA notes that the dDCO [REP6-005] was amended and now includes provision for consultation with the SNCB within Requirement 7.</p> <p>With reference to the Outline Landscape and Ecological Management Strategy [REP6-035], the ExA notes that it will form the basis for a final Written Landscape Scheme, which will both be prepared and submitted to the Local Planning Authority for approval prior to construction of the Project secured by DCO Requirement. It includes various survey methods and monitoring measures are referred to, for example:</p> <p><u>Survey Methods:</u></p> <p>Paragraph 12 sets out that the OLEMS has been drafted based on the findings of pre-consent surveys undertaken between 2021 and 2023. Further information and full survey results is found within the range of 17 documents listed, and informed by other documents e.g. Biodiversity Net Gain (BNG) Strategy [REP3-028] and Green Infrastructure Plan [APP-134].</p> <p><u>Monitoring requirements and a requirement to maintain, including potential for re-planting:</u></p> <p>Section 3.11 of the OLEMS [REP6-035] includes maintenance of landscape planting. It includes that "<i>The success of landscape planting will be monitored over a 10-year aftercare period after planting. During this period any plants which fail, die, are removed, or become seriously damaged or diseased, shall be replaced in the first available planting season with a specimen of the same species and size as that originally planted</i>" (see Paragraph 248 and following).</p> <p>Please can the IPs identified comment on, and respond to, the following:</p> <p>i) Does the OLEMS sufficiently cover survey methods, monitoring requirements and requirement to maintain, including potential for re-planting due to plant failures.</p>

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ExQ3	Question to:	Question:
		<p>ii) Whether or not, in their view, the associated Requirement 7 for a Written Landscape Scheme can rely on the detail within the OLEMS to address NE's concerns regarding landscaping requirements as set out above.</p> <p>iii) Regarding the replacement of failed planting, it is noted that the Applicants commit to the replacement of failed planting for a period of ten years. Given that the provided photomontages provide assessments of the effect of landscaping at 15 years, do you consider ten years to be long enough for this provision?</p>
	ECC & TDC Response:	<p>The OLEMS does include a number of surveys including Habitat, BNG, Marine Mammal, Benthic and Intertidal Ecology, Ornithological and Fish and Shellfish Ecology Surveys. The OLEMS outlines regular monitoring to ensure the success of planted vegetation and habitats. If any plants fail, the OLEMS specifies that re-planting will be carried out to maintain the intended ecological benefits. Green Infrastructure is not a statutory requirement, so OLEMS provide the outline guidelines and commitments that can secure the details for landscaping and GI via Requirement 7. The recent updates to OLEMS includes consideration of the Essex Local Nature Recovery Strategy, BNG and GI, which is welcomed.</p> <p>i) The Councils understanding is that any existing and proposed planting that contributes to the landscape and visual mitigation and enhancements within the red line of the proposed substation will necessarily be 'maintained' for the lifetime of the installation. We also understand that any planting that contributes towards the BNG calculation will necessarily be maintained for 30 years in any case. Our further understanding is that the 10-year aftercare period relates to the period of establishment for new planting and not to the long-term maintenance of the overall scheme.</p> <p>ii) We propose that some clarification of terms is included in the OLEMS for the avoidance of doubt and confusion.</p> <p>iii) The Councils would not accept that long-term management of the planting around the substation does not happen beyond Year 10 and propose that clarification of terms 'maintenance' and 'aftercare' and the long-term intent of the landscape, GI and BNG strategies are recognised and will be delivered for the lifetime of the substation. For</p>

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ExQ3	Question to:	Question:
		example, in the event of a severe weather event in Year 15, it needs to be required that the landscape, visual and ecological benefits of the proposals would be restored.
Q14.0.4	Applicant, SCC, other IPs	<p>Duty to Enhance National Landscape</p> <p>The Applicant's response to ExQ2 Q14.0.1 confirmed that the Applicant is a statutory undertaker as defined in s85 of the CRow Act, and that it is therefore a relevant authority for the purposes of the Act. The Applicant set out its position within its Position Statement [REP5-068], as well as [REP5-055] and in further information submitted at Deadline 6, in response the ExA's Rule 17 request dated June 6 2025 [PD-014].</p> <p>In summary, the response [REP6-062] considers, on a without prejudice basis, specific additional compensatory measures that could be applied to enable the Applicant and the Secretary of State to discharge the Duty should the Secretary of State consider that such measures are required, including consideration of principles to form the basis for the development and delivery of a National Landscape Enhancement Scheme (or similar) together with a list of projects identified and a mechanism for securing such a scheme [REP6-062].</p> <p>The Applicant considers that the effects on the SECHNL are visual in nature only. Environmental Statement (ES) Chapter 29 Seascape, Landscape and Visual Impact Assessment (SLVIA) [APP-043] concludes that there will be significant effects on views from locations along the southern coastal edge of the SECHNL, between the River Deben and Orford Ness. There will be no significant effects on landscape character, and no significant effects on the special qualities of the SECHNL [REP5-038].</p> <p>The ExA now seeks views from IPs on the response [REP6-062] including the without prejudice Requirement and the content of the National Landscape Enhancement Strategy. Further specific questions are also set out below.</p>

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Essex County Council (ECC) and Tendring District Council (TDC) Joint Response to ExQ3 issued on 1 July 2025

ExQ3	Question to:	Question:
	ECC & TDC Response:	<p>Whilst the Councils are not significantly impacted in LVIA terms by the proposed <u>offshore</u> elements of the North Falls proposals we have concerns regarding the approach to the 'Duty' is interpreted by the applicant. We wish to make the following points:</p> <ul style="list-style-type: none"> The project types focus closely on promotion of the National Landscape through access rather than '<i>contribute to the conservation and enhancement of the natural beauty, special qualities, and key characteristics of Protected Landscapes</i>' identified in the Government guidance: Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes¹, published 16 December 2024. Projects should more closely help to deliver landscape restoration that delivers visual benefits, rather than mainly physical access projects. The scope of the enhancement scheme should more closely align with the scale of the impact i.e. <u>significant</u> visual impacts over a 16km odd length of the coast (taken from the mouth of the Deben to Orford Ness). £10K appears a derisory sum.
Q14.05	IPs, Applicant	<p>National Landscape Enhancement Scheme Principles: Mechanism for Delivery</p> <p>The ExA notes the Applicant's suggested wording for a Requirement to deliver the National Landscape Enhancement Scheme (below), submitted on a without prejudice basis at Deadline 6 [REP6-062]:</p> <p>National Landscape Enhancement Scheme</p> <p>(1) <i>Work No. 1 and Work No. 2 must not be commenced until a National Landscape Enhancement Scheme has been submitted to and approved by the discharging authority in consultation with Suffolk & Essex Coast & Heaths National Landscape Partnership.</i></p> <p>(2) <i>The National Landscape Enhancement Scheme must accord with the principles and fund size set out in the National Landscape Enhancement Scheme principles document.</i></p> <p>(3) <i>The National Landscape Enhancement Scheme must be implemented as approved.</i></p> <p>(4) <i>In this Requirement "the National Landscape Enhancement Scheme principles document" means the principles set out in Table 1 of Applicant's Response to ExA's Request for further information (Rule 17) - National Landscapes.</i></p>

¹ [Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes - GOV.UK](#)

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ExQ3	Question to:	Question:
		Comments from IPs are specifically sought in relation on the wording of above suggested Requirement, submitted on a without prejudice basis.
	ECC & TDC Response:	No comment.
Q14.06	IPs, Applicant	<p>National Landscape Enhancement Scheme Principles: Scope of Projects</p> <p>The scope of projects is set out in Table 1 of [REP6-062], with a focus on projects and initiatives relating to enjoyment of the coast and coastal views and those in line with the objectives of the Suffolk & Essex Coast & Heaths National Landscape Management Plan 2023-2028. Projects could include (but would not be limited to) enhancements to car parking, access or visitor facilities at coastal locations; footpath enhancements including to coastal paths; beach surveys and clean ups. These would be delivered as part of the National Landscape Enhancement Scheme will be selected at the discretion of the Suffolk & Essex Coast & Heaths National Landscape Partnership.</p> <p>The ExA requests IPs comments on the scope of projects.</p>
	ECC & TDC Response:	<p>Whilst the Councils are not impacted directly in LVIA terms by the proposed offshore elements of the North Falls proposals, we have concerns regarding the approach to the scope of projects in that they focus closely on promotion of the National Landscape through physical access rather than '<i>contribute to the conservation and enhancement of the <u>natural beauty, special qualities, and key characteristics of Protected Landscapes</u></i>' (our underlining) identified in the Government guidance: Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes², published 16 December 2024.</p> <p>Although the significant impacts are visual, the intervisibility of the offshore infrastructure impacts indirectly on the character of the landscape. Landscape has a perceptual element. The gradual incremental closing down of the natural horizon with man-made structures gives the increasing effect of a tamed seascape rather than a perpetual natural</p>

² [Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes - GOV.UK](#)

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ExQ3	Question to:	Question:
		element. This change has occurred rapidly this century. With this in mind, projects could more directly deliver landscape restoration that in turn delivers visual benefits, rather than just enabling physical access. Access could also be understood in terms of interpreting the change through art, music or writing.
Q14.07	IPs, Applicant	<p>National Landscape Enhancement Scheme Principles: Spatial Scope</p> <p>The spatial scope of the projects is set out in Table 1 of [REP6-062], and focuses on the area likely to be affected by views of the Project, ie. the coastal edge between the River Deben and Orford Ness. Table 1 states that “<i>All projects and initiatives must therefore be located within this area</i>”.</p> <p>The ExA requests IPs comments on the spatial scope, and the suggestion that initiatives must be within the area between the River Deben and Orford Ness.</p>
	ECC & TDC Response:	Whilst it would be preferable that projects are limited to areas that are directly significantly visually impacted, we judge that it could be impractical in delivery terms to be so constrained and that some broader criteria or parameters may be required.
Q14.08	IPs, Applicant	<p>National Landscape Enhancement Scheme Principles: Fund Size</p> <p>The fund size of £10,000 is set out in Table 1 of [REP6-062]. The ExA requests IPs comments on the Applicant’s proposed fund size, and whether or not the measures and fund size can be considered to be proportionate to the type and scale of development as it affects the National Landscape, reasonably related to the identified residual adverse effects, and sufficient to allow for the discharge of the statutory duty by both the Applicant and by the Secretary of State.</p>
	ECC & TDC Response:	Whilst the Councils are not impacted directly in LVIA terms by the proposed offshore elements of the North Falls proposals, we have concerns regarding the scope of the enhancement scheme and suggest it should more closely align with the scale of the impact i.e. <u>significant</u> visual impacts over a 16km odd length of the coast (taken from the mouth of the Deben to Orford Ness). £10K appears a derisory sum.
Q14.09	IPs, Applicant	National Landscape Enhancement Scheme Principles: Fund Timing

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ExQ3	Question to:	Question:
		<p>The fund timing is set out in Table 1 of [REP6-062], which suggests a single one-off payment made by the Applicant to the Suffolk & Essex Coast & Heaths National Landscape Partnership prior to the commencement of construction of Work No. 1 or Work No. 2. The timing of projects and initiatives benefited by the fund would then be at the discretion of the Suffolk & Essex Coast & Heaths National Landscape Partnership.</p> <p>The ExA requests IPs comments on the fund timing.</p>
	ECC & TDC Response:	<p>The Councils have no objection for the National Landscape Partnership to administer the fund based on their initiatives and timing. Given the proposed funding size, it is likely that additional funding sources may be required for the delivery of specific enhancement projects. The fund should be ring-fenced for Suffolk & Essex Coast & Heaths National Landscape.</p>
Q14.0.10	Applicant	<p>Cumulative Landscape Effects</p> <p>The Applicant has submitted visualisations [REP4-029 and REP4-030] showing the Norwich to Tilbury pylons in blue, modelled at between 48m and 60m in height. In its response to ExQ2, NGET [REP5-101] has stated that <i>“The first six or seven pylons are expected to be in the order of 50m height with individual heights responding to factors including span length between pylons, terrain etc. Taller pylons, in the order of 60m height, would be expected to be required to achieve necessary clearances of the railway”</i>.</p> <p>Please can the Applicant confirm its position regarding the impact of the 50-60m pylon modelling in combination with VEOWF and NFOWF substations.</p>
Q14.0.11	Applicant, Natural England, ECC, SCC, SECHNLP	<p>Impact on LCTs</p> <p>In response to ExQ2 14.0.5 the Applicant confirmed that in its view, at a distance of over 40km from any onshore LCT (Landscape Character Type), that it is satisfied that <i>“the magnitude of change is correctly recorded as ‘low’”</i> in each case.</p> <ol style="list-style-type: none"> Please can the Applicant confirm what, if any other criteria than distance have been used to estimate the magnitude of change. Please can NE (and others, optionally) comment on factors other than distance which they consider would contradict the Applicant’s assertion regarding the 40km distance to any onshore LCT.

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ExQ3	Question to:	Question:
	ECC & TDC Response:	Intervisibility is a critical element of landscape character and seascape assessment. Although the significant impacts are described as visual, the intervisibility of the offshore infrastructure impacts indirectly on the character of the landscape. Perception of change in landscape or seascapes is therefore an important factor in assessing change. The gradual incremental closing down of the open horizon with man-made structures, no matter how far distant, gives the increasing effect of a tamed seascape rather than an unchanging natural element. This change has occurred rapidly this century. This could also be said to impact on tranquillity which has a sensual not just an audible and visual element.
Q14.0.12	Natural England	<p>Natural England: Risk and Issues Log</p> <p>NE's advice in its Risk & Issues Log [REP6-089] I-Seascape has remained unchanged throughout. Deadline 6 submission states that NE will not be responding further on these issues unless new information is forthcoming, or the Applicant's conclusions change.</p> <p>Following the submission of the Applicant's without prejudice response [REP6-062] to the ExA's Rule 17 [PD-014] request, please can NE update this advice and risk log in respect of those issues to which [REP6-062] relates.</p>
Q14.0.13	Applicant, Natural England	<p>Underestimation of Effects</p> <p>NE has stated that, in its view, the ES underestimates the effects of the proposed development in landscape and seascape terms on the National Landscape. The Applicant's response to ExQ2 14.0.6 refers to its technical note [REP3-044] and states that it does not consider that NE's precise steps to overcome this are necessary or appropriate.</p> <p>Please can the Applicant</p> <ul style="list-style-type: none"> i) Summarise how it considers that effects have not been underestimated. And ii) Please can NE set out specifically which of the effects have been underestimated, including by reference to specific points set out in the ES.
Q14.0.14	SCC, Applicant, other IPs optionally.	Suffolk County Council Comments on submissions received at Deadline 5

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ExQ3	Question to:	Question:
		<p>SCC has submitted comments on Deadline 5 submissions [REP6-092] as a response to the Applicant's Deadline 5 (D5) submissions and representations made by other interested parties at D5, as appropriate. Within this context, please can SCC explain how items 1f - Application of Duty and 1g - Discharge of Duty are sufficiently separate considerations, and are not, in effect, double counting a similar issue.</p> <p>Other IPs and the Applicant may also comment, optionally.</p>
	ECC & TDC Response:	No comments.
Q14.0.15	Applicant, ECC/ other IPs	<p>New visualisation (VP9) from Barn Lane - Grange Road</p> <p>In response to ExQ2 14.04, the Applicant stated that it would be providing an additional photomontage visualisation from Grange Road, to be submitted at Deadline 6. The selected viewpoint is immediately north of the proposed onshore substation works area. The ExA notes [REP6-065] and [REP6-066] provide new visualisations for new Viewpoint VP9.</p> <p>This appears to currently be absent of corresponding narrative, such as that which accompanies VPs 1 to VP8 within Chapter 30 of the ES (see Tables 30.21 to 30.28).</p> <ul style="list-style-type: none"> i) In the interest of consistency and completeness, please can the Applicant provide an update to VP9, or signpost to where this information is contained by Deadline 7. ii) IPs are invited to comment on VP9 photomontages at this stage, and following Deadline 7, to comment further on the accompanying narrative.
	ECC & TDC Response:	<p>The Year1 photograph indicates the extent of the impact which will occur during construction and on completion. The viewpoint plan is at such a small scale it is hard to tell exactly if this VP is exactly at the junction of Barn Lane and Grange Road. Assuming that it is, then the proposed mitigation is a hedgerow, and it is shown in full leaf in summer. It can be assumed that for up to ten years, there will remain the chance that users of Barn Lane will have a view over the top and that even in Year 15 that in winter that the substations will be visible through the hedgerow, as most native hedgerow plants are deciduous. The cumulative views do not show the N2T pylons. The baseline image demonstrates the openness of the current landscape and therefore the loss of this experience to the users of the PRow.</p>

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ExQ3	Question to:	Question:
Q14.0.16	Applicant, IPs	Tranquillity The ExA notes the Applicant's response to ExQ2 14.0.8 and the updated technical document on special qualities [REP5-038]. Please can IPs including SCC and SCHNLP respond to this update.
	ECC & TDC Response:	See comment in relation to tranquillity at Q14.0.11.
15.	Navigation & Shipping	
16.	Socio-economic Effects	
Q16.0.3	The Applicant	<p>The Statement of Common Ground with Essex CC and Tendring DC [REP5-082] sets out the concerns of the Councils in particular the comments in section 2.9 relating to the commitments to education, training and employment. The Councils also raise points regarding the Harwich Green Energy Hub and the contribution the Proposed Development will make to research and the development of construction, renewable and sustainable sectors. Tourism is also specified as important to the local economy and the Council wish to have a dialogue to ensure contributions to improvement projects.</p> <p>What progress has been made with the Councils in respect of the requirements they have set out in relating to socio-economic and tourism impacts.</p>
Q16.0.3	ECC and TDC Response:	<p>Following the discussions with the applicant on 11 July 2025, it is agreed between the parties that the applicant would provide an Addendum to the OSEP, outlining some quantifiable minimum targets of measures committed by the applicant in relation to skills and employment, which could be further elaborated in the final SEP. Additional measures could be further explored during the development of the final SEP with continual dialogue with stakeholders to identify other potential projects within Essex as well as wider geographical area in East of England.</p> <p>In view of the significant shortage of professionals and labour in the relevant industries and the growth agenda within Essex as well as Suffolk, the Councils also requested the applicant to provide more details on the labour forecast by types for the next few years, in addition to those already provided within the OSEP. These are essential for the Councils to assist in workforce development and training as well as to minimise labour competition among other NSIPs and</p>

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ExQ3	Question to:	Question:
		strategic developments. These estimated figures will allow the Councils to strategically plan ahead to allow resources to be appropriately allocated, staggering project timelines to avoid peak demand overlaps and commence early dialogue with local employers, education sectors and skills providers to invest in upskilling and promoting sector growth.
17.	Terrestrial Transportation and Traffic	
Q17.01	Applicant	Outline Construction Traffic Management Plan (OCTMP) With reference to ECC's Comments on any submissions received at the previous deadline [REP6-081], ECC has proposed the following statement for inclusion in the final CTMP: "The final CTMP will set out the details of how employee vehicles arriving before 7AM will be managed". Could the Applicant confirm whether they accept this statement and propose to include it in the final OCTMP?
	ECC & TDC Response:	ECC has agreed with the Applicant on the additional text to be included in para. 60 of the OCTMP and expects those to be included in their Deadline 7 submission.