



**NORTH FALLS**

*Offshore Wind Farm*

## Statement of Common Ground

National Highways (Tracked)

Document Reference: 10.7  
Volume: 10  
Date: ~~April~~ July 2025  
Revision: 01



**NORTH FALLS**

*Offshore Wind Farm*

<b>Project</b>	North Falls Offshore Wind Farm
<b>Document Title</b>	Statement of Common Ground – National Highways <u>(Tracked)</u>
<b>Document Reference</b>	10.7
<b>Supplier</b>	Royal HaskoningDHV
<b>Supplier Document ID</b>	PB9244-RHD-ZZ-ZZ-RP-ON-0332

This document and any information therein are confidential property of North Falls Offshore Wind Farm Limited and without infringement neither the whole nor any extract may be disclosed, loaned, copied or used for manufacturing, provision of services or other purposes whatsoever without prior written consent of North Falls Offshore Wind Farm Limited, and no liability is accepted for loss or damage from any cause whatsoever from the use of the document. North Falls Offshore Wind Farm Limited retains the right to alter the document at any time unless a written statement to the contrary has been appended.

<b>Revision</b>	<b>Date</b>	<b>Status/Reason for Issue</b>	<b>Originator</b>	<b>Checked</b>	<b>Approved</b>
0	April 2025	Deadline 4	RHDHV	NFOW	NFOW
<u>1</u>	<u>July 2025</u>	<u>Deadline 8</u>	<u>RHDHV</u>	<u>NFOW</u>	<u>NFOW</u>

## Contents

1	Introduction .....	5
1.1	Introduction .....	5
1.2	Consultation with the National Highways .....	5
1.3	Summary of Agreed, Not Agreed and In Discussion.....	6
2	Statement of Common Ground .....	7
2.1	Traffic and Transport.....	7
3	Signatures.....	14

## Table of Tables

Table 1.1	Topics included in the SoCG .....	5
Table 1.2	Position status key.....	6
Table 2.1	Summary of Consultation with National Highways .....	7
Table 2.2	Topics agreed, in discussion or not agreed in relation to Traffic and Transport .....	9

## Glossary of Acronyms

DCO	Development Consent Order
EPP	Evidence Plan Process
ETG	Expert Topic Group
HGV	Heavy Goods Vehicle
NFOW	North Falls Offshore Wind Farm Limited
OCTMP	Outline Construction Traffic Management Plan
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground
SRN	Strategic Road Network
TEMPro	Trip End Model Presentation Programme

## Glossary of Terminology

Bentley Road improvement works	Works involving the widening and improvement of the carriageway along Bentley Road, required to facilitate heavy goods vehicle and abnormal indivisible load access to the onshore cable route and the onshore substation.
Onshore cable route	Onshore route within which the onshore export cables and associated infrastructure would be located.
Onshore substation	A compound containing electrical equipment required to transform and stabilise electricity generated by the Project so that it can be connected to the National Grid.
The Applicant	North Falls Offshore Wind Farm Limited (NFOW).
The Project or 'North Falls'	North Falls Offshore Wind Farm, including all onshore and offshore infrastructure.

# 1 Introduction

## 1.1 Introduction

1. This Statement of Common Ground (SoCG) has been prepared by North Falls Offshore Wind Farm Limited (NFOW) (the Applicant) and National Highways. It identifies areas of North Falls Offshore Wind Farm (hereafter 'the Project' or 'North Falls') where matters are agreed, not agreed or that remain under discussion between the parties.
2. The Applicant has had regard to the Planning Inspectorate (2024) guidance regarding Statements of Common/Uncommon Ground for Hearings and Inquiries when compiling the SoCG.
3. This SoCG has been structured to reflect topics of the application which are of interest to National Highways. The applicable matters considered within the SoCG apply to National Highways' statutory and non-statutory remit.
4. Table 1.1 presents the topics included in the SoCG with the Applicant and National Highways.

**Table 1.1 Topics included in the SoCG**

Topic/Chapter	DCO Document Reference
Traffic and Transport	APP-041

5. Topic specific matters agreed, not agreed, and matters that remain under discussion between the Applicant and National Highways are included within this SoCG. Matters that are not yet agreed will be the subject of ongoing discussion between the Applicant and National Highways to reach agreement on each matter wherever possible or refine the extent of disagreement between parties.
6. Throughout the SoCG the phrase "Agreed" identifies any point of agreement between the Applicant and National Highways. The phrase "Not Agreed" identifies any point that is not agreed between the Applicant and National Highways.

## 1.2 Consultation with the National Highways

7. The Applicant has engaged with National Highways on the project during the pre-Application process, both in terms of informal non-statutory engagement and formal consultation carried out pursuant Section 42 of the Planning Act 2008.
8. During statutory (Section 42) consultation, National Highways provided comments on the Preliminary Environmental Information Report (PEIR) by way of letter dated 14<sup>th</sup> July 2023.
9. Further to the statutory Section 42 consultation, several meetings were held with National Highways through the Evidence Plan Process (EPP). These are detailed throughout the SoCG, Consultation Report **[APP-215]** and minutes of the meetings.

10. In addition, following DCO submission National Highways provided a Technical Note (TN02) outlining AECOMs retained technical review of the salient traffic and transport documents.
11. Details of the consultation held with National Highways through the DCO process are detailed in Table 2.1.

### 1.3 Summary of Agreed, Not Agreed and In Discussion

12. In order to easily identify whether a matter is 'agreed', 'not agreed', or 'in discussion' the position status colour coding system set out in Table 1.2 is used in the SoCG.
13. Details of specific topics that are 'agreed', 'not agreed', or 'in discussion' between the Applicant and National Highways are presented in Table 2.2

**Table 1.2 Position status key**

Position Status	Position Colour Coding
<p>Agreed.</p> <p>The matter is considered to be agreed between the parties.</p>	Agreed
<p>Not Agreed- no material impact</p> <p>The matter is not yet agreed between the parties however the outcome of the approach taken by either the Applicant and National Highways <b>is</b> not considered to result in a material impact to the assessment conclusions and the matter is considered to be closed for the purposes of this SoCG. Discussion on these matters have concluded.</p>	Not Agreed - no material impact
<p>Not Agreed- material impact</p> <p>The matter is not agreed between the parties and the outcome of the approach taken by either the Applicant and National Highways is considered to result in a materially different impact to the assessment conclusions. Discussions on these matters have concluded.</p>	Not Agreed - material impact
<p>In discussion</p> <p>The matter is neither 'agreed' nor 'not agreed' and is a matter where further discussion is required between the parties (e.g. where the documents are yet to be shared with the National Highways).</p>	In discussion

## 2 Statement of Common Ground

14. A summary of the consultation undertaken to date with National Highways and the matters agreed or not agreed between the Applicant and National Highways (based on discussions and information exchanged between the Applicant and National Highways) are set out below.

### 2.1 Traffic and Transport

**Table 2.1 Summary of Consultation with National Highways**

Date	Contact Type	Topic
<b>Pre-Application</b>		
7 June 2022	Expert Topic Group(ETG) Meeting	<p>The following topics were discussed during the ETG meeting:</p> <ul style="list-style-type: none"> <li>• The potential to access from the A120;</li> <li>• The extent of the TTSA;</li> <li>• The approach to data collection;</li> <li>• Impacts to be assessed; and</li> <li>• Proposed DCO documents.</li> </ul> <p>Further details regarding discussions and agreements are provided within Environmental Statement (ES) Appendix 27.4 Traffic and Transport Consultation <b>[APP-168]</b>.</p>
14 July 2023	PEIR response	Section 42 responses provided by National Highways.
05 September 2023	ETG Meeting	<p>The following topics were discussed during the ETG meeting:</p> <ul style="list-style-type: none"> <li>• Study area;</li> <li>• Capacity assessments;</li> <li>• Distribution and assignment of HGV traffic; and</li> <li>• Employee to vehicle ratio.</li> </ul> <p>Further details regarding discussions and agreements are provided within ES Appendix 27.4 Traffic and Transport Consultation <b>[APP-168]</b>.</p>
30 October 2023	ETG Meeting	A meeting held with Essex County Council and National Highways to discuss the proposed works to Bentley Road and the A120. Further details regarding discussions and agreements are provided within ES Appendix 27.4 Traffic and Transport Consultation <b>[APP-168]</b> .
11 January 2024	ETG Meeting	A meeting to discuss the proposed works to Bentley Road and the A120 and review the responses to the Road Safety Audits for the accesses and crossings. Further details regarding discussions and agreements are provided within ES Appendix 27.4 Traffic and Transport Consultation <b>[APP-168]</b> .
<b>Post-Application</b>		
18 October 2024	Relevant Representation	National Highways response to the relevant representation consultation.
26 November 2024	ETG Meeting	A meeting to discuss National Highways Relevant Representation. Further details of the matters discussed are summarised within Table 2.2.

Date	Contact Type	Topic
23 December 2024	Technical Note 02 (TN02)	National Highways submitted a Technical Note (TN02) outlining AECOMs retailed technical review of the salient traffic and transport documents.
05 February 2025	Applicant's response to TN02	The Applicant provided a detailed response to TN02 as a precursor to a meeting of the 7 February 2025 where these matters could be discussed.
07 February 2025	ETG Meeting	A meeting was held with National Highways to discuss TN02 and the Applicant's response.
15 April 2025	ETG Meeting	A meeting was held with National Highways to discuss the Update to TN02 and the Applicant's response.
<a href="#"><u>28 March 2025</u></a>	<a href="#"><u>Briefing Note 03 (TN02)</u></a>	<a href="#"><u>Briefing Note prepared by AECOM on behalf of National Highways to review the Applicant's response to AECOM Technical Note TN02.</u></a>
<a href="#"><u>23 June 2025</u></a>	<a href="#"><u>ETG Meeting</u></a>	<a href="#"><u>Meeting to discuss peak hour assessments and junction modelling results.</u></a>
<a href="#"><u>02 July 2025</u></a>	<a href="#"><u>Technical Note 05 (TN02)</u></a>	<a href="#"><u>Technical Note prepared by AECOM on behalf of National Highways to conclude the assessment of the junction modelling provided by the Applicant.</u></a>



**Table 2.2 Topics agreed, in discussion or not agreed in relation to Traffic and Transport**

ID	The Applicant's Position	National Highways Position	Position Summary
1	<p><b>Traffic and Transport Study Area</b></p> <p>The extent of the traffic and transport study area (TTSA) presented within ES Chapter 27 Traffic and Transport [APP-041] is acceptable.</p> <p>National Highways confirmed at a meeting on the 26/11/2024 that they agreed with the extent of the TTSA presented and reconfirmed within TN02 that this matter is agreed.</p>	National Highways is content that this matter is agreed.	Agreed
2	<p><b>Baseline Traffic Flows</b></p> <p>The ES Chapter 27 Traffic and Transport [APP-041] adequately characterises the baseline traffic flows.</p> <p>The approach to capturing baseline traffic flows was agreed with National Highways at a meeting on the 07/06/2022 and reconfirmed at an ETG on the 05/09/2023. National Highways did not raise any issues on this subject within their Relevant Representation. It was also agreed at a meeting on the 07/02/2025 that turning counts undertaken for the junction sensitivity modelling were appropriate.</p>	National Highways received traffic flow diagrams and a revised Annex 27.1.3 on 16 April 2025, <del>and these are being reviewed by our technical consultants, Aecom.</del> <u>AECOM have reviewed the information provided and all outstanding issues have been resolved.</u>	<del>In discussion</del> Agreed
3	<p><b>Assignment of HGV Traffic</b></p> <p>The approach to distribution and assignment of all HGV traffic is acceptable.</p> <p>It was agreed at a meeting with National Highways on the 05/09/2023 that the assessment would assume all HGV traffic is assigned to the A120 with a sensitivity test of 100% of HGV traffic being assigned east on the A120 to Harwich and 100% west toward the A12. National Highways have not raised any concerns on this matter within the Relevant Representation or TN02.</p>	This is dependent on review of traffic flow diagrams and National Highway will confirm its position on completion of <del>Aecom's</del> <u>AECOM's</u> review.	<del>In discussion</del> Agreed
4	<p><b>Assignment of Employee Traffic</b></p> <p>The approach to distribution and assignment of employee traffic is acceptable.</p> <p>The approach to the assignment and distribution of employee traffic was discussed at a meeting on the 05/09/2023. National Highways sought clarification of</p>	<del>AECOM is currently reviewed the traffic flow diagrams on National Highways' behalf. As a consequence, National Highways is content with the Applicant's approach to the assignment and distribution of employee traffic. National Highways will confirm its position on completion of Aecom's review.</del>	<del>In discussion</del> Agreed

ID	The Applicant's Position	National Highways Position	Position Summary
	<p>matters via TN02. The Applicant provided clarification at a meeting on the 07/02/2025 and shared native excel files to allow National Highways to audit the distribution (noting this is harder to achieve from the pdf files). National Highways have agreed to review these files and revert.</p>	<p><u>Further, the car share ratio will be monitored along with (most significantly) the hourly vehicle numbers and National Highways is confident that if this is exceeded a mechanism will be in place to mitigate this exceedance, prior to start the construction. Aecom is currently reviewing the traffic flow diagrams on National Highways' behalf. National Highways will confirm its position on completion of Aecom's review.</u></p>	
5	<p><b>Road Safety Assessment</b></p> <p>The assessment of highway safety set out in ES Chapter 27 Traffic and Transport [APP-041] is appropriate.</p> <p>The road safety assessment methodology was agreed with National Highways at a meeting on the 07/06/2022 and the approach to road safety data collection was agreed on the 05/09/2023 and reconfirmed at a meeting on the 26/11/2024.</p> <p>TN02 raised comments regarding a number of identified collision clusters and the Applicant has provided detailed clarifications to these matters during a meeting on the 07/02/2025. National Highways have advised that they have no further comments on these matters. It is therefore considered by the Applicant that this matter is agreed.</p>	<p><u>National Highways raised a potential concern regarding identified collision clusters on the A120.</u></p> <p><u>This matter is now considered by National Highways to be superseded due to its plans to implement a 50 mph speed limit and average speed cameras to the east of Horsley Cross, which is expected to improve safety on the route. National Highways raised three recommendations, which were included in Aecom's latest Briefing Note (BN 03), ID 14, 15 and 16.</u></p>	<p><del>In discussion</del>Agreed</p>
6	<p><b>Severance, amenity and road closures</b></p> <p>The conclusions of the assessment of likely significant effects in ES Chapter 27 Traffic and Transport [APP-041] are appropriate for the impacts of severance, amenity and driver delay (road closures).</p> <p>National Highways requested clarifications in their TN02 and the Applicant have provided detailed clarifications during a meeting on the 07/02/2025. It is considered that this matter is agreed.</p>	<p>National Highways is content that this matter has been resolved.</p>	<p>Agreed</p>
7	<p><b>Capacity</b></p> <p>The conclusions of the assessment of likely significant effects in ES Chapter 27 Traffic and Transport [APP-041] are appropriate for the impact of driver delay (capacity).</p>	<p><u>AECOM, on behalf of National Highways, have completed a review of the junction modelling undertaken by the Applicant's transport consultants, and are content that these models demonstrated that the impact on these junctions from the proposed development would not be severe. Therefore, there</u></p>	<p><del>In discussion</del>Agreed</p>

ID	The Applicant's Position	National Highways Position	Position Summary
	<p>Outline Construction Traffic Management Plan <b>[APP-251]</b> (which is secured by Requirement 9 of the draft DCO <b>[REP3-008]</b> includes a commitment to ensuring 80% of employees would arrive before network peak hour and depart before or after the pm peak.</p> <p>Following the submission of the DCO, at a meeting on the 26/11/2024 National Highways have confirmed that they wish to see capacity modelling at two particularly sensitive junctions to test the effects of the residual traffic (Horsley Cross and Bentley Road).</p> <p>The Applicant has presented initial findings at a meeting on the 07/02/2025 demonstrating that the junctions would continue to operate with spare capacity with the application of the Projects peak traffic. The Applicant has provided copies of the modelling to National Highways and National Highways have agreed to review and revert. It is therefore considered that this matter is not yet agreed and remains in discussion.</p>	<p><del>are no capacity concerns regarding the A120 SRN junctions and this matter is now closed. Aecom is currently reviewing the models of Horsley Cross and Bentley Road junctions. National Highways will confirm its position following completion of this review and will advise whether the results indicate that further modelling of other junctions is required</del></p>	
8	<p><b>A120/Bentley Road improvements</b></p> <p>The design of the A120/Bentley Road improvements and the approach to securing the future detailed design through the Outline Construction Traffic Management Plan (OCTMP) is appropriate.</p> <p>National Highways have requested copies of the final design and Road Safety Audit for the A120/Bentley Road mitigation within the Relevant Representation and TN02. Copies of the final design and RSA have been provided to National Highways for a meeting on the 07/02/2025. National Highways agreed that they were content with the designs and findings of the RSA.</p>	<p>National Highways is satisfied that the current design is acceptable, subject to the detailed design.</p>	Agreed
9	<p><b>Abnormal loads</b></p> <p>The conclusions of the assessment of likely significant effects in ES Chapter 27 Traffic and Transport <b>[APP-041]</b> are appropriate for the impact of abnormal loads.</p> <p>National Highways confirmed within their Relevant Representation that it supports the proposed strategy to transport transformers from the Port of Harwich along the</p>	<p><u>National Highways is satisfied that all AIL issues have been addressed appropriately for this stage of the project.</u></p> <p><u>The final agreed route for AILs is subject to approval by National Highways via the Electronic Service Delivery for Abnormal Loads (ESDAL) system before operation. The</u></p>	<del>In discussion</del> Agreed

ID	The Applicant's Position	National Highways Position	Position Summary
	<p>A120 and via Bentley Road. National Highways' abnormal loads team (responsible for approving abnormal load movements on behalf of the Secretary of State for Transport) have also provided agreement in principle on the 17 July 2024 to the proposed route and no concerns had been raised.</p> <p>The Relevant Representation for National Highways has raised concerns with regard to the condition of the concrete road at the A120 Wix bypass (the A120 between Colchester Road and Harwich Road to the north of the village of Wix).</p> <p>The Applicant has provided additional clarifications to National Highways and agreed to include amendments to the OCTMP to incorporate the requirement to survey and agree mitigation measures prior to movement.</p> <p><u>A draft version of the updated OCTMP (Rev3) incorporating these requested changes has been shared with National Highways and will be submitted at Deadline 4.</u> This matter is therefore noted as agreed.</p>	<p><u>Applicant will need to allow sufficient time for this process to be completed.</u></p> <p><del>National Highways is still reviewing the draft OCTMP and expect this to be resolved shortly</del></p>	
10	<p><b>DCO wording</b></p> <p>The draft DCO <b>[REP3-008]</b> wording, including Requirement 9 'Construction Traffic Management Plan' and Protective Provisions for National Highways are appropriate and acceptable.</p> <p>National Highways did not raise any issues in relation to the Requirement wording within their Relevant Representation or TN02 but the Applicant understands that National Highways are still considering the Protective Provision wording. It is considered that this matter remains in discussion.</p>	<p><u>The Outline Construction Traffic Management Plan has been agreed. The final CTMP will be addressed at a later stage, prior to commencement of construction.</u></p> <p><del>National Highways has agreed the Protective Provisions with the Applicant and is content that the Strategic Road Network is sufficiently protected by these in combination with a side agreement, which together are sufficient to prevent serious detriment arising to National Highway's statutory undertaking. the Applicant's lawyers, who are seeking instruction from the Applicant.</del></p> <p><del>National Highways has not yet agreed to the proposed Protective Provisions and remains in discussion with Applicant on this matter</del></p>	<u>In discussion</u> Agreed
11	<p><b>OCTMP</b></p> <p>The measures contained within the Outline Construction Traffic Management Plan (OCTMP) (<b>document reference 7.16 [Rev3]</b>) (which is secured by Requirement 9 of the</p>	<p><u>National Highways is satisfied with the changes made to the draft OCTMP concerning monitoring, mitigation and controls, as submitted at Deadline 4. As advised at Deadline 5, this was subject to the conclusions of National Highways' assessment of</u></p>	<u>In discussion</u> Agreed

ID	The Applicant's Position	National Highways Position	Position Summary
	<p>draft DCO <b>[REP-008]</b> to manage the potential for significant effects upon the Strategic Road Network (SRN) are adequate and appropriate.</p> <p>National Highways requested clarifications in TN02 and the Applicant have provided these during a meeting on the 07.02.2025 and National Highways have agreed that these matters are resolved.</p> <p>National Highways have however also asked for additional measures/controls for employee and abnormal load movements.</p> <p><u>A draft version of the updated OCTMP (Rev3) incorporating these requested changes has been shared with National Highways and will be submitted at Deadline 4.</u> This matter is therefore noted as agreed.</p>	<p><u>the additional junction modelling, which is now complete and satisfactory. Therefore, this matter is now closed.</u><del>National Highways received the draft OCTMP on 14 April 2025 and it remains under review</del></p>	

### 3 Signatures

15. The above SoCG is agreed between the Applicant and National Highways on the day specified below.

Signed: \_\_\_\_\_



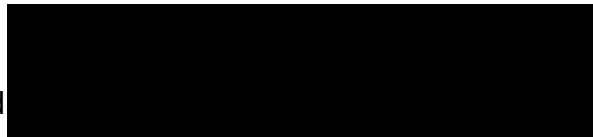
Print Name: Kelly Milburn

Job Title: Spatial Planning Manager (East)

Date: 23 July 2025

Duly authorised for and on behalf of National Highways

Signed \_\_\_\_\_



Print Name: CORMAC ROONEY

Job Title: Consents Manager

Date: 23/07/2025

Duly authorised for and on behalf of the Applicant



**NORTH FALLS**

*Offshore Wind Farm*



**RWE**

## **HARNESSING THE POWER OF NORTH SEA WIND**

*North Falls Offshore Wind Farm Limited*

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

*To contact please email [contact@northfallsoffshore.com](mailto:contact@northfallsoffshore.com)*

© 2024 All Rights Reserved

***NorthFallsOffshore.com***