



NORTH FALLS

Offshore Wind Farm

PROGRESS WITH STATEMENTS OF COMMON GROUND (Tracked)

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7	23 July 2025	Deadline 8	NFOW	NFOW	NFOW

Contents

1.	Introduction	6
1.1	Purpose of this document.....	6
1.2	Engagement with stakeholders	6
1.3	Examining Authority's Procedural Decisions in relation to Statements of Common Ground.....	7
2.	List of statements of common ground	8
2.1	Introduction	8
2.2	Parties where SoCG is under discussion, in draft, or agreed	8
2.3	Parties where matters are intended to be addressed through Protective Provisions and/or Side Agreements	15
2.4	Parties where there is agreement that no SoCG is required	16
2.5	Parties where no response has been received	17
3.	Structure of statements of common ground	18
4.	Summary of Current position	20
4.1	Summary at Deadline 1 and 2	20
4.2	Summary at Deadline 3	20
4.3	Summary at Deadline 4	20
4.4	Summary at Deadline 5	21
4.5	Summary at Deadline 6	21
4.6	Summary at Deadline 7	21
4.7	Summary at Deadline 8	22
4.8	Introduction	22
4.9	Summary Table – Principal Areas of Disagreement.....	22
4.10	Overview of Matters Not Agreed	23

4.11	Status of all SoCGs	19
1.	Introduction	5
1.1	Purpose of this document	5
1.2	Engagement with stakeholders	5
1.3	Examining Authority's Procedural Decisions in relation to Statements of Common Ground	6
2.	List of statements of common ground	7
2.1	Introduction	7
2.2	Parties where SoCG is under discussion, in draft, or agreed	7
2.3	Parties where matters are intended to be addressed through Protective Provisions and/or Side Agreements	11
2.4	Parties where there is agreement that no SoCG is required	12
2.5	Parties where no response has been received	13
3.	Structure of statements of common ground	15
4.	Summary of Current position	17
4.1	Summary at Deadline 1 and 2	17
4.2	Summary at Deadline 3	17
4.3	Summary at Deadline 4	17
4.4	Summary at Deadline 5	18
4.5	Summary at Deadline 6	18
4.6	Summary at Deadline 7	18
4.7	Status of all SoCGs	19

Tables

<u>Table 2.1: Parties where SoCG is under discussion, in draft, or agreed</u>	<u>9</u>
<u>Table 2.2: Parties where matters are intended to be addressed through Protective Provisions and/or Side Agreements</u>	<u>15</u>
<u>Table 2.3: Parties where there is agreement that no SoCG is required</u>	<u>16</u>
<u>Table 2.4: Parties where no response has been received</u>	<u>17</u>
<u>Table 3.1 Position Status Key for SoCGs</u>	<u>18</u>
<u>Table 4.1 Overview of Matters Not Agreed</u>	<u>23</u>
Table 2.1: Parties where SoCG is under discussion, in draft, or agreed	8
Table 2.2: Parties where matters are intended to be addressed through Protective Provisions and/or Side Agreements	14
Table 2.3: Parties where there is agreement that no SoCG is required	15
Table 2.4: Parties where no response has been received	16
Table 3.1 Position Status Key for SoCGs	17

1. INTRODUCTION

1.1 Purpose of this document

- 1.1.1 This document was prepared by the North Falls Offshore Wind Farm Limited (NFOW) (as 'the Applicant') in support of the Application for a Development Consent Order (DCO) for the North Falls Offshore Wind Farm (herein referred to as 'North Falls' or 'the Project').
- 1.1.2 This document is intended to provide the Examining Authority (ExA) with an update as to the status of the discussions taking place with prescribed bodies and interested parties, as documented in the form of the Statements of Common Ground (SoCGs).
- 1.1.3 It is intended to act as a 'live' document and will be updated in accordance with the Examination Timetable.
- 1.1.4 A detailed description of the Project can be found in ES Chapter 5 Project Description **[APP-019]**.

1.2 Engagement with stakeholders

- 1.2.1 As set out in the Consultation Report **[AS-015]** submitted with the DCO application, the Applicant has sought to engage with a number of stakeholders throughout the development of the Project. Engagement with stakeholders has included the following activities:
 - Stage 1 (introductory) consultation was a non-statutory consultation on the Project's early proposals which took place between 25 October and 10 December 2021 (see Chapter 4 of the Consultation Report **[AS-015]**)
 - Stage 2 (pre-application) consultation was a non-statutory consultation on the Project's progress following its stage 1 (introductory) consultation and took place between 17 October and 9 December 2022 (see Chapter 5 of the Consultation Report **[AS-015]**)
 - Stage 3 (statutory) consultation was a statutory consultation focused on the Project's Preliminary Environmental Information Report (PEIR) which took place between 16 May and 14 July 2023 (see Chapter 6 - 10 of the Consultation Report **[AS-015]**).
 - Stage 4 (targeted) consultation focused on proposed localised changes to the Project's onshore PEIR boundary (as presented at the stage 3

(statutory) consultation) which took place between 14 March and 22 April 2024 (see Chapter 11 of the Consultation Report [**AS-015**])

1.3 Examining Authority's Procedural Decisions in relation to Statements of Common Ground

ExA's Procedural Decision - 28 November 2024

- 1.3.1 On 28 November 2024, the ExA issued a series of procedural decisions [**PD-005**] in relation to the Examination. The ExA made a Procedural Decision that the Applicant must enter into bilateral or multi-party Statements of Common Ground (SoCGs) with all the parties listed.
- 1.3.2 On the 2 December 2024 the Applicant notified, via email, all of the parties listed in the ExA's Procedural Decision [**PD-005**] in relation to SoCGs.
- 1.3.3 The Applicant has engaged and continues to engage proactively with all parties listed in [**PD-005**] to prepare SoCGs and agree matters where possible.

ExA's Rule 8 Letter – 4 February 2025

- 1.3.4 The Applicant notes the ExA's comments relating to SoCGs within Annex B of the Rule 8 Letter [**PD-008**] regarding the submission of updated and final SoCGs during Examination.

2. LIST OF STATEMENTS OF COMMON GROUND

2.1 Introduction

- 2.1.1 The Applicant is preparing SoCGs with a number of parties. Where possible, the Applicant has endeavoured to make early progress in preparing SoCGs with stakeholders such that draft and agreed SoCGs can be submitted in a timely manner into the Examination.
- 2.1.2 This section of the Progress with Statements of Common Ground (PrSoCG) **[9.11 (Rev 5)]** document is structured as follows:
- Parties where SoCG is under discussion, in draft, or agreed;
 - Parties where matters are intended to be addressed through Protective Provisions and/or Side Agreements;
 - Parties where there is agreement no SoCG is required; and
 - Parties where no response has been received.

2.2 Parties where SoCG is under discussion, in draft, or agreed

- 2.2.1 The parties with which the Applicant is in the process of pursuing SoCGs with are listed in Table 2.1 below, their status is categorised as ‘under discussion’, ‘in draft’, or ‘agreed’.
- 2.2.2 The Applicant notes that in some instances whilst a draft SoCG has been prepared and is with the party for review, in some cases the party has not yet provided comments on the draft SoCG ahead of Deadline 7.
- 2.2.3 Therefore, to provide each party with sufficient time for review and to ensure that any draft SoCG submitted into the Examination has been reviewed by the party and incorporates any comments the party may have (noting that the Applicant has prepared the first draft of all SoCGs) a number of draft SoCGs are intended to be submitted at Deadline8.
- 2.2.4 This approach will also ensure that any draft SoCG is representative of the party’s current view or position.

Table 2.1: Parties where SoCG is under discussion, in draft, or agreed

STAKEHOLDER	STATUS
<i>Parties where SoCG is under discussion</i>	
Aldeburgh Town Council	Awaiting outcome of council meeting that took place on 10 February 2025. No further correspondence has been received.
Ardleigh Parish Council	The Applicant has had no further response from Ardleigh Parish Council regarding the development of the SoCG. A Draft SoCG was provided to the Parish Council for discussion during their meeting held in February 2025
Essex Suffolk Norfolk Pylons (ESNP)	ESNP have advised the Applicant that there would be limited merit in discussing matters further given both parties' respective positions on the relevant issues, and therefore at this stage an SoCG is no longer being pursued. The Applicant has noted and responded to ESNP's relevant representations and Deadline 4 submission and is willing to engage with all stakeholders should they wish to at any point in the Project's lifecycle.
Frating Parish Council	The Applicant has had no further engagement with Frating Parish Council and awaits their response.
<u>Kent & Essex Inshore Fisheries Conservation Authority</u>	<u>The Applicant is awaiting a response from the Kent & Essex Inshore Fisheries Conservation Authority (KEIFCA) to an email sent on 07/07/2025 clarifying that the KEIFCA's concerns could be captured in the SoCG between the Applicant and the Commercial Fisheries Working Group (CFWG, of which KEIFCA is a member. The Applicant has noted and responded to key areas of concerns outlined by the KEIFCA, and asked whether they would like to submit their concerns as a formal response. No further correspondence has been received.</u>
Port of Felixstowe	The Applicant has had no further response from Port of Felixstowe.
<i>Parties where SoCG is in draft</i>	

STAKEHOLDER	STATUS
Anglian Water	Draft being prepared by the Applicant, expected for Examination at Deadline 8.
Babergh District Council	<p>The Applicant has not received a signed copy of the SoCG with Babergh District Council but did discuss matters with them via a meeting on the 16 July 2025, and prior to this meeting a draft copy of the SoCG was also shared with them. The, the- version of the SoCG submitted at Deadline 8 -was updated to reflect those discussions moving two items from 'in discussion' to 'not agreed'.</p> <p>Whilst the Applicant has not received a signed version of the SoCG from Babergh District Council, it is, to the best of the Applicant's knowledge, a fair and accurate representation of Babergh District Council's position that the two matters are 'not agreed'.</p> <p>If the Applicant receives a response prior to the close of Examination it will submit a signed version.</p> <p>In draft and with party for review and comment. Expected for Examination at Deadline 8.</p>
Suffolk and Essex Coast and Heaths National Landscape Partnership	Draft being prepared by the Applicant, expected for Examination at Deadline 8.
<i>Parties where SoCG is in draft and submitted into the Examination</i>	
Corporation of Trinity House of Deptford Strond	Updated Draft SoCG submitted into Examination at Deadline 5.
Commercial Fisheries Working Group	<p>Draft SoCG submitted into Examination at Deadline 5.</p> <p>The Commercial Fisheries Working Group (CWFVG) represents a number of the stakeholders who were seeking to agree a joint SoCG with the Applicant. The CWFVG includes:</p> <ul style="list-style-type: none"> • <u>Felixstowe Ferry Fishermen's Association;</u>

STAKEHOLDER	STATUS
	<ul style="list-style-type: none"> • <u>Harwich Harbour Fishermen's Association;</u> • <u>Kent and Essex Inshore Fisheries and Conservation Authority (KEIFCA);</u> • <u>Orford and District Fishermen's Association;</u> • <u>Southwold Fishermen's Association;</u> • <u>Fishermen from Lowestoft;</u> • <u>Thanet Fishermen's Association; and</u> • <u>West Mersea Fishermen's Association.</u> <p><u>The Applicant has been corresponding with the CFWG members since February 2025 on the preparation of a SoCG via email correspondence and an in person meeting.</u></p> <p><u>Updates were made to the SoCG submitted at Deadline 5 following feedback received from the CFWG members.</u></p> <p><u>On 21 July the Applicant received separate emails from CFWG members (Harwich Harbour Fishermen's Association and Thanet Fishermen's Association) stating that they will not be signing the SoCG.</u></p> <p><u>It is noted that the Harwich Harbour Fishermen's Association alongside other fishing stakeholders from the 'Commercial Fisheries Working Group' (CWFG). It is understood CWFG represent a number of the stakeholders as follows and they are seeking to agree a joint SoCG with the Applicant. The CWFG includes:</u></p> <p><u>Felixstowe Ferry Fishermen's Association;</u></p> <p><u>Harwich Harbour Fishermen's Association;</u></p> <p><u>Kent and Essex Inshore Fisheries and Conservation Authority (KEIFCA);</u></p> <p><u>Orford and District Fishermen's Association;</u></p>

STAKEHOLDER	STATUS
	<p>Southwold Fishermen's Association; Fishermen from Lowestoft; Thanet Fishermen's Association; and West Mersea Fishermen's Association.</p> <p>The CFWG associations represent approximately fifty fishing vessels. Most vessels are under 10m length and a large portion use multiple fishing methods.</p> <p>The Applicant notes that the MMO is part of the CFWG but there is a separate SoCG between the MMO and the Applicant.</p>
Environment Agency	Updated Draft SoCG submitted into Examination at Deadline 7.
Essex County Council (Joint with Tendring) Tendring District Council (Joint with Essex)	Updated Draft SoCG submitted into Examination at Deadline 7.
East Suffolk Council	Draft SoCG submitted into Examination at Deadline 7.
Harwich Haven Authority	Updated Draft SoCG submitted into Examination at Deadline 6.
London Gateway Port Ltd	Draft SoCG submitted into Examination at Deadline 6
Marine Management Organisation	Draft SoCG submitted into Examination at Deadline 4.
Maritime Coastguard Agency	Draft SoCG submitted into Examination at Deadline 7.
National Federation of Fishermen Organisations (NFFO)	Draft SoCG submitted into Examination at Deadline 6.
National Highways	Draft SoCG submitted into Examination at Deadline 4.
National Trust	Draft SoCG submitted into Examination at Deadline 3.

STAKEHOLDER	STATUS
Port of London Authority	Draft SoCG submitted into Examination at Deadline 7.
Port of Tilbury London Limited	Draft SoCG submitted into Examination at Deadline 4 (please note whilst the SoCG is signed items are still 'under discussion').
Royal Society for the Protection of Birds (RSPB)	Draft SoCG submitted into Examination at Deadline 7.
Suffolk County Council (SCC)	Draft SoCG submitted into Examination at Deadline 6.
UK Chamber of Shipping	Draft SoCG submitted into Examination at Deadline 4 (please note whilst the SoCG is signed items are still 'under discussion').
<i>Parties where SoCG is agreed</i>	
<u>Anglian Water</u>	<u>Signed by both parties and submitted into Examination at Deadline 8 (all matters are listed as 'agreed').</u>
<u>Corporation of Trinity House of Deptford Strond</u>	<u>Signed by both parties and submitted into Examination at Deadline 8.</u>
<u>Essex County Council (Joint with Tendring)</u> <u>Tendring District Council (Joint with Essex)</u>	<u>Signed by both parties and submitted into Examination at Deadline 8.</u>
<u>East Suffolk Council</u>	<u>Signed by both parties and submitted into Examination at Deadline 8.</u>
<u>Environment Agency</u>	<u>Signed by both parties and submitted into Examination at Deadline 8.</u>
Essex County Fire and Rescue Service	Signed by both parties and submitted into Examination at Deadline 5.
Essex Police	Signed by both parties and submitted at Deadline 1.
Essex Wildlife Trust	Signed by both parties and submitted at Deadline 6.

STAKEHOLDER	STATUS
Forestry Commission	Signed by both parties and submitted at Deadline 2. An updated version, Rev 1, is submitted at Deadline 3.
<u>Harwich Haven Authority</u>	<u>Signed by both parties and submitted into Examination at Deadline 8.</u>
Historic England	Signed by both parties and submitted at Deadline 6
<u>Maritime Coastguard Agency</u>	<u>Signed by both parties and submitted into Examination at Deadline 8.</u>
<u>Marine Management Organisation</u>	<u>Signed by both parties and submitted into Examination at Deadline 8.</u>
<u>National Highways</u>	<u>Signed by both parties and submitted into Examination at Deadline 8.</u>
<u>National Federation of Fishermen Organisations (NFFO)</u>	<u>Signed by both parties and submitted into Examination at Deadline 8.</u>
<u>National Trust</u>	<u>Signed by both parties and submitted into Examination at Deadline 8.</u>
<u>Royal Society for the Protection of Birds (RSPB)</u>	<u>Signed by both parties and submitted into Examination at Deadline 8.</u>
Royal Yachting Association	Signed by both parties and submitted at Deadline 4.
<u>Suffolk County Council (SCC)</u>	<u>Signed by both parties and submitted into Examination at Deadline 8.</u>
<u>Suffolk and Essex Coast and Heaths National Landscape Partnership</u>	<u>Signed by both parties and submitted into Examination at Deadline 8.</u>
<u>UK Chamber of Shipping</u>	<u>Signed by both parties and submitted into Examination at Deadline 8.</u>
UK Health Security Agency	Signed by both parties and submitted into Examination at Deadline 5.

2.3 Parties where matters are intended to be addressed through Protective Provisions and/or Side Agreements

- 2.3.1 The Applicant has been in discussion with and continues to engage with the parties listed in Table 2.2 to agree matters through the Protective Provisions to be included within the Draft Development Consent Order **[AS-022]** and/or Side Agreements. This is to provide specific protections to their infrastructure as is appropriate and common practice with statutory undertakers.
- 2.3.2 A summary of the status of negotiations with statutory undertakers can be found in the Applicant's Land Rights Tracker (submitted at Deadline 4) [8.4 (Rev 2)].

Table 2.2: Parties where matters are intended to be addressed through Protective Provisions and/or Side Agreements

STAKEHOLDER	STATUS	REFERENCE IN DRAFT DCO
Affinity Water Limited	Protective Provisions included within the Draft DCO submitted at Deadline 6 are now agreed between the parties.	Schedule 14 - Protective Provisions Part 10 – For the protection of Affinity Water
Anglian Water Services	Protective Provisions included within the Draft DCO submitted at Deadline 5 are now agreed between the parties.	Schedule 14 - Protective Provisions Part 9 – For the protection of Anglian Water
Cadent Gas Limited	Agreed Protective Provisions included within the Draft DCO	Schedule 14 - Protective Provisions - Part 12 – For the protection of Cadent Gas Limited
National Grid Electricity Transmission PLC	Agreed Protective Provisions included within the Draft DCO	Schedule 14 - Protective Provisions Part 11 – For the protection of National Grid Electricity Transmission

STAKEHOLDER	STATUS	REFERENCE IN DRAFT DCO
Network Rail Infrastructure Limited	Protective Provisions included within the Draft DCO but under discussion	Schedule 14 - Protective Provisions Part 5 – For the protection of Network Rail

2.4 Parties where there is agreement that no SoCG is required

2.4.1 Table 2.3 below lists the parties where it has been agreed that no SoCG is required, on the basis that the party has no substantive comments on the application, and in the interest of reducing unnecessary documentation.

Table 2.3: Parties where there is agreement that no SoCG is required

STAKEHOLDER	STATUS
Civil Aviation Authority	The Civil Aviation Authority confirmed via email to the Applicant on the 14 February 2025 they are not seeking to agree a SoCG with the Applicant in respect of the Project.
Ministry of Defence	The Ministry of Defence confirmed via email to the Applicant on the 11 February 2025 they are not seeking to agree a SoCG with the Applicant in respect of the Project.
National Air Traffic Services (NATS)	NATS have provided a written response via email to the Applicant on 24 January 2025 confirming that at this stage no SoCG is required. It is noted that an email from NATS to the ExA was issued on the 4 November 2024 removing their objection.
Suffolk and North East Essex Integrated Care Board	The Suffolk and North East Essex Integrated Care Board confirmed via email to the Applicant on the 20 February 2025 that at this stage no SoCG is required.
The Cruising Association	Following the issuing of a draft SoCG to the Cruising Association on the 12 February 2025, a response was received via email on the 23 February 2025, stating <i>“the Statement of Common Ground approach is not applicable to The Cruising Association as a voluntary organisation respondent in the</i>

STAKEHOLDER	STATUS
	<i>consultation and we will submit our comments in the normal way”.</i>
The Wildlife Trusts	The Wildlife Trusts confirmed via email to the Applicant on the 27 January 2025 that they will not be participating in the North Falls Examination and have stated that they anticipate Essex Wildlife Trust to engage directly on relevant matters.

2.5 Parties where no response has been received

- 2.5.1 Table 2.4 below lists the parties where no response has been received following notification and follow-up email communication regarding the ExA’s Procedural Decision **[PD-005]**.

Table 2.4: Parties where no response has been received

STAKEHOLDER	STATUS
Dedham Vale Society	No response received.
Kent & Essex Inshore Fisheries Conservation Authority	No response received.
Hertfordshire County Council	No response received.
Leiston-cum-Sizewell Town Council	No response received.
Little Bromley Parish Council	No response received.

3. STRUCTURE OF STATEMENTS OF COMMON GROUND

- 3.1.1 To ensure consistency in the approach taken to document matters agreed, matters subject to further negotiation, or matters not agreed, each of the SoCGs will adopt a standard format in order to provide clarity to other parties and the ExA.
- 3.1.2 Each SoCG will have the following structure:
- **Section 1:** provides an introduction to the SoCG and a description of its purpose.
 - **Section 2:** states the engagement that has occurred between the Applicant and the party (or parties).
 - **Section 3:** sets out any issues that have arisen, reporting on the status of each issue, i.e., whether it is agreed, still under discussion or not agreed, and any remaining actions.
- 3.1.3 Additional appendices may be provided in the SoCG containing any relevant documents or information that are referenced in the SoCG and do not otherwise form part of the DCO application.
- 3.1.4 In order to easily identify the position status in relation to a matter, the position status colour coding set out in Table 3.1 is used in the SoCGs.

Table 3.1 Position Status Key for SoCGs

Position Status	Position Colour Coding
Agreed. The matter is considered to be agreed between the parties.	Agreed
Not Agreed - no material impact The matter is not yet agreed between the parties however the outcome of the approach taken by either the Applicant and the stakeholder is not considered to result in a material impact to the assessment conclusions or the DCO application documents or Examination and the matter is considered to be closed for the purposes of this SoCG. Discussion on these matters have concluded.	Not Agreed- no material impact
Not Agreed - material impact The matter is not agreed between the parties and the outcome of the	Not Agreed- material impact

approach taken by either the Applicant and the stakeholder is considered to result in a materially different impact to the assessment conclusions or the DCO application documents or Examination. Discussions on these matters have concluded.	
In discussion 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 stakeholder)	In discussion

3.1 Status of all SoCGs

- 3.1.1 Table 2.1 above outlines the status for parties where an SoCG is under discussion, in draft, or agreed.
- 3.1.2 Table 2.2 above outlines the status for parties where matters are intended to be addressed through Protective Provisions within the Draft Development Consent Order **[AS-022]** and/or a Side Agreement.
- 3.1.3 Table 2.3 above outlines the status for parties where there is agreement that no SoCG is required.
- 3.1.4 Table 2.4 above outlines the status for where no response has been received.

4. SUMMARY OF CURRENT POSITION

4.1 Summary at Deadline 1 and 2

- 4.1.1 This section provides an overall summary as to the status of SoCGs and their progress. The status of the individual SoCG set out in previous sections should be referred to for the full detail on specific matters.
- 4.1.2 The Applicant and Essex Police have an agreed SoCG that is submitted at Deadline 1 to the Examination.
- 4.1.3 Aldeburgh Parish Council and Ardleigh Parish Council both held council meetings on 10 of February 2025, in order to discuss whether they wished to enter into a SoCG with the Applicant. No further response has been received by the Applicant in relation to the SoCGs.
- 4.1.4 It is noted that some parties do not appear familiar with the Examination process and have expressed a need for further information and or time to consider how best to engage with the Applicant in relation to SoCGs.
- 4.1.5 The Applicant remains committed to assisting all parties in the preparation of an SoCG and will continue to engage with all relevant parties.

4.2 Summary at Deadline 3

- 4.2.1 The Applicant has submitted a draft SoCG with National Trust into Examination at Deadline 3.
- 4.2.2 The Applicant has also submitted an updated version of the SoCG **[10.2 (Rev 1)]** with the Forestry Commission.

4.3 Summary at Deadline 4

- 4.3.1 The Applicant has submitted a draft SoCG at Deadline 4 with: the Essex Wildlife Trust; Marine Management Organisation; National Highways; Port of Tilbury London Ltd; and the UK Chamber of Shipping.
- 4.3.2 The Applicant has submitted an updated draft SoCG with the Environment Agency at Deadline 4.
- 4.3.3 The Applicant and the Royal Yachting Association have an agreed SoCG which has been submitted at Deadline 4.

4.4 Summary at Deadline 5

- 4.4.1 The Applicant has submitted a draft SoCG at Deadline 5 with: the Commercial Fisheries Working Group; Essex County Council and Tendring District Council; and Historic England.
- 4.4.2 The Applicant has submitted an updated draft SoCG at Deadline 5 with: Corporation of Trinity House of Deptford Strond; the Essex Wildlife Trust; and the Environment Agency.
- 4.4.3 The Applicant and the UK Health Security Agency have an agreed SoCG which has been submitted at Deadline 5.
- 4.4.4 The Applicant and Essex County Fire and Rescue have an agreed SoCG which has been submitted at Deadline 5.

4.5 Summary at Deadline 6

- 4.5.1 The Applicant has submitted a draft SoCG at Deadline 6 with: Suffolk County Council; Harwich Haven Authority; London Gateway Port Ltd; and the National Fishermen's Federation Organisation (NFFO).
- 4.5.2 The Applicant has submitted an updated draft SoCG at Deadline 6 with: Essex County Council and Tendring District Council.
- 4.5.3 The Applicant and Historic England have agreed an SoCG which has been submitted at Deadline 6.
- 4.5.4 The Applicant and the Essex Wildlife Trust have agreed an SoCG which has been submitted at Deadline 6.

4.6 Summary at Deadline 7

- 4.6.1 The Applicant has submitted a draft SoCG at Deadline 7 with: the Maritime Coastguard Agency; the Royal Society for the Protection of Birds (RSPB); the Port of London Authority; and East Suffolk Council.
- 4.6.2 The Applicant has submitted an updated draft SoCG at Deadline 7 with: Essex County Council and Tendring District Council; and the Environment Agency.

4.7 Summary at Deadline 8

4.7.4.8 Introduction

4.8.1 The parties with whom the Applicant continues to have unresolved matters; where the approach taken by either the Applicant or the stakeholder is considered to result in a materially different impact on the assessment conclusions, the DCO application documents, or the Examination; are listed in the Summary Table: Areas of Disagreement below.

4.9 Summary Table – Principal Areas of Disagreement

4.9.1 Please note this table intentionally does not include the following matters:

- Agreed
- Not agreed - not material

4.9.2 The table does include some items listed as 'in discussion' where appropriate and relevant such that the Applicant considers it to be a point of disagreement. Not all 'in discussion' items have been included.

4.9.3 The Applicant notes that discussions have been ongoing with a number of stakeholders and the Applicant has received some updates late on the 23 July 2025. The Applicant and IPs need additional time to review and consider matters that are in discussion.

4.9.4 The Applicant has listed these parties below where a signed SoCG is anticipated ahead of prior to the Close of Examination, but was not received in time for submission at Deadline 8. They are:

- London Gateway Port Limited – outstanding matters not included within the table
- Port of Tilbury London Limited – outstanding matters, not included within the table
- Port of London Authority – outstanding matters, not included within the table note 'not agreed' matters included within the table following email correspondence confirming the status of issues

4.84.10 Overview of Matters Not Agreed

Table 4.1 Overview of Matters Not Agreed

<u>PARTY</u>	<u>SoCG ID</u>	<u>TOPIC</u>	<u>ITEM</u>	<u>SUMMARY OF NOT AGREED MATTERS</u>	<u>APPLICANT COMMENT</u>
<u>Babergh District Council</u>					
<u>Babergh District Council</u>	<u>NF.BD.02</u>	<u>Landscape Visual Impacts</u>	<u>Impacts on the Dedham Vale National Landscape</u>	<u><i>The councils take this opportunity to register their concern in respect of the potential visual impacts of the onshore substation element of the project on the landscape of Babergh District Council, including the designated National Landscape, especially having regard to cumulative impacts with other projects in the area.</i></u>	<p><u>Relevant NPS EN-1 Paragraphs - 5.10.16 – 5.10.38</u></p> <p><u>ES Chapter 30 Landscape and Visual Impact Assessment [APP-044] recognises the potential for localised landscape and visual effects (including cumulative), associated with the proposed North Falls onshore substation. The impacts of the project on the landscape character of the study area are set out in detail in ES Chapter 30 Landscape and Visual Impact Assessment [APP-044].</u></p> <p><u>No significant effects are anticipated on National Landscapes (NL) (Dedham Vale) to the north of the proposed onshore. Viewpoint 8 (refer to ES Figure 30.2.8 [APP-083 to APP-088]), which is taken from a location on the southern edge of the NL (Essex Way, Dedham Road) represents some of the closest and potentially ‘worst case’ views from the NL. From this location hedgerow and woodland cover, across the relatively flat intervening landscape between the southern edge of the NL and the North Falls onshore substation, play a notable screening role.</u></p> <p><u>The Applicant’s position remains that the effects on the Dedham Vale National Landscape are not significant and that the Project accords with NPS EN-1.</u></p> <p><u>See the following application documents:</u></p> <ul style="list-style-type: none"><u>• ES Chapter 30 Landscape and Visual Impact Assessment [APP-044]</u>

<u>PARTY</u>	<u>SoCG ID</u>	<u>TOPIC</u>	<u>ITEM</u>	<u>SUMMARY OF NOT AGREED MATTERS</u>	<u>APPLICANT COMMENT</u>
					<ul style="list-style-type: none"> <u>Landscape and Visual Impact Assessment Viewpoints and the Dedham Vale National Landscape Plan (Rev 0) [REP4-045]</u> <u>Onshore Substation Zone of Theoretical Visibility and Viewpoint Locations with Dedham Vale National Landscape (Rev 0) [REP4-047]</u>
<u>East Suffolk Council</u>					
<u>East Suffolk Council</u>	<u>N/A</u>	<u>Seascape and Landscape Visual Impacts</u>	<u>Impacts on Suffolk Coast and Heaths National Landscape (SECHNL)</u>	<p><u>ESC's initial seascape visual impact concerns have been significantly reduced following the removal of the northern array of wind turbines, together with the overall reduction in proposed maximum turbine heights to below 400m at a distance of approximately 42km offshore. We therefore do not consider that the statutory purposes for designation of the National Landscape are compromised to an extent that justify grounds for objection.</u></p> <p><u>This conclusion is based on the currently submitted proposals, should these change at any stage, ESC would need to revisit our position in terms of seascape visual impacts. ESC will continue to monitor this throughout the examination period and engage where necessary to support our position in relation to possible impacts on the seascape. Should the current project proposals change, potentially resulting in a significant impact being identified, we will seek appropriate mitigation and if necessary, compensation.</u></p> <p><u>ESC recognises that discussions between the Applicant and the statutory body are ongoing, however we note that agreement is yet to be reached. ESC wishes to see agreement reached between the parties, with the statutory body's concerns being addressed.</u></p>	<p><u>Relevant NPS EN-1 Paragraphs - 5.10.16 – 5.10.38</u></p> <p><u>The Applicant's full position with regards to potential impacts on the Suffolk and Essex Coast and Heaths National Landscape is described in response to RR-316 as contained within the Applicant's Response to Relevant Representations from statutory consultees and non-prescribed consultees [REP1-045].</u></p> <p><u>ES Chapter 29 Seascape, Landscape and Visual Impact Assessment [APP-043] concludes in Table 29.1 that there will be no significant impacts on the special qualities of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (now defined at the Suffolk and Essex Coast and Heaths National Landscape). The ES chapter sets out the following reasoning:</u></p> <ul style="list-style-type: none"> <u>Taking a precautionary approach to the assessment, the scale of change on certain perceptual aspects of the SECHNL special qualities is judged to be medium, although other special qualities will be entirely unchanged.</u> <u>The geographical extent of the change will be small, limited to coastal areas within around 40km of the Offshore Above-sea Development, between Bawdsey Manor and Orford Ness.</u> <u>This will affect a very localised area of the coastal edge, in the context of this large-scale designation.</u> <u>Effects will also be limited to days with clear weather.</u> <u>For the vast majority of the NL, which is largely beyond 40km from the Offshore Above-sea Development, and due to the increased distance and the reduced visibility from inland areas, the scale of change will be small or negligible.</u>

<u>PARTY</u>	<u>SoCG ID</u>	<u>TOPIC</u>	<u>ITEM</u>	<u>SUMMARY OF NOT AGREED MATTERS</u>	<u>APPLICANT COMMENT</u>
					<ul style="list-style-type: none"> • <u>On clear days, operational wind farms including East Anglia One, Greater Gabbard and Galloper will also be visible. The Offshore Above-sea Development will be seen in the context of these offshore wind farms.</u> • <u>The Offshore Above-sea Development will intensify the effects associated with offshore wind farm development that influence certain perceptual special qualities of the NL.</u> • <u>The contribution of offshore turbines to the seascape horizon is acknowledged in the special qualities of the NL, where it is acknowledged that they divide opinion.</u> • <u>The Offshore Above-sea Development will not greatly extend the spread of turbines across the horizon. It will introduce turbines into an area of the skyline which has already been altered by offshore wind farm development.</u> • <u>The project will also contribute to the “developing story of the Suffolk’s Energy Coast”.</u> • <u>Overall, the magnitude of impact to the special qualities of the NL will be locally low along the coast, and negligible further inland.</u> • <u>This is not judged to translate into significant effects on the special qualities of the SECHNL.</u> <p><u>In addition, to the above [APP-043] 3.1.31 Environmental Statement Chapter 29 Seascape, Landscape and Visual Impact Assessment records the assessment of impacts on the communities along the Suffolk coast. Table 29.14 (page 54) to Table 29.19 records (page 61) the magnitude of visual effect on coastal communities. Generally, the visual impacts are low to medium.</u></p> <p><u>See the following application documents:</u></p> <ul style="list-style-type: none"> • <u>Environmental Statement Chapter 29: Seascape, Landscape and Visual Impact Assessment [APP-043]</u> • <u>Assessment of the Special Qualities of the Suffolk and Essex Coast and Heaths National Landscape and Suffolk Heritage Coast - Technical Note [REP5-038]</u>

<u>PARTY</u>	<u>SoCG ID</u>	<u>TOPIC</u>	<u>ITEM</u>	<u>SUMMARY OF NOT AGREED MATTERS</u>	<u>APPLICANT COMMENT</u>
					<ul style="list-style-type: none"> Position Statement on various issues relating to National Landscapes [REP5-068] .
<u>Suffolk and Essex Coast and Heaths National Landscape Partnership</u>					
<u>Suffolk and Essex Coast and Heaths National Landscape Partnership</u>	<u>6</u>	<u>SLVIA</u>	<u>Effects on the SECHNL</u>	<p><u>ES Chapter 29 concludes that the Proposed Development will not cause significant impacts on the special qualities of the SECHNL, with effects being localised, limited to clear weather days, and seen in the context of existing offshore wind farms. The updated Technical Note [REP5-038] supports this conclusion.</u></p> <p><u>The Partnership consider the main issues and impacts are:</u></p> <p><u>i) The impacts of the proposals on the nationally designated Suffolk Coast & Heaths Area of Outstanding Natural Beauty, in particular the defined characteristics of the area as described in Natural Beauty and Special Qualities documents.</u></p>	<p><u>Relevant NPS EN-1 Paragraphs - 5.10.1 – 5.10.38</u></p> <p><u>The Applicant considers that the assessment of effects on the SECHNL, presented in Table 29.21 of ES Chapter 29 Seascape and Landscape Visual Impact Assessment [APP-043] and supplemented by the Assessment of the Special Qualities of the Suffolk and Essex Coast and Heaths National Landscape and Suffolk Heritage Coast - Technical Note [REP3-044] (SECHNL TN) is robust, as set out in the Applicant's previous response to Natural England (see Applicant's Response to Relevant Representations from Natural England [REP1-044], Applicant's ref NE-42). The Applicant considers that the assessment of effects on the SECHNL referred to above combined with the assessment of effects on landscape character presented in Section 29.6.3.2.1 of ES Chapter 29 Seascape and Landscape Visual Impact Assessment [APP-043] and supplemented by the SECHNL TN, is a sufficient basis on which to conclude that effects on the Suffolk Heritage Coast will not be significant.</u></p> <p><u>The Applicant's position remains as above and asserts that the methodology of the assessment is in accordance with the NPS and relevant GLVIA guidance.</u></p> <p><u>See the following application documents:</u></p> <ul style="list-style-type: none"> <u>Environmental Statement Chapter 29: Seascape and Landscape Visual Impact Assessment [APP-043]</u> <u>Assessment of the Special Qualities of the Suffolk and Essex Coast and Heaths National Landscape and Suffolk Heritage Coast - Technical Note [REP6-062]</u>
<u>Suffolk and Essex Coast and Heaths</u>	<u>7</u>	<u>SLVIA</u>	<u>Duty to seek to further the purpose of conserving and</u>	<u>The Applicant acknowledges the updated legal duty under the CRoW Act to seek to further the purpose of conserving and enhancing natural beauty of the National Landscapes, referencing</u>	<p><u>Relevant NPS Paragraphs:</u></p> <p><u>NPS EN-1 Section 5.10 and</u></p>

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<u>National Landscape Partnership</u>			<u>enhancing the natural beauty of the area</u>	<p>recent Defra guidance. The Project has been sensitively designed and the Applicant assets that further measures are not proportionate.</p> <p>The SECHNL Partnership considers this an active duty applying to all relevant authorities, including the Applicant, and stresses the need for full compliance with national and local policy.</p>	<p>NPS EN-3 Paragraphs 2.8.204 -2.8. 217.</p> <p>The Applicant disagrees and maintains its position that the Applicant has discharged the Duty in respect of the Project and that the Secretary of State can be confident that the Duty can be discharged when determining the DCO Application without the need to impose additional compensatory measures or requirements.</p> <p>See the following application documents:</p> <ul style="list-style-type: none"> • <u>Position Statement on various issues relating to National Landscapes (Rev 0) [REP5-068]</u> . • <u>Applicant's Response to ExA's Request for further information (Rule 17) - National Landscapes (Rev 0) [REP6-062]</u>
<u>Suffolk and Essex Coast and Heaths National Landscape Partnership</u>	<u>8</u>	<u>SLVIA</u>	<u>Draft National Landscape Enhancement Scheme principles</u>	<p>The SECHNL Partnership maintain that the without prejudice draft principles contained in the Applicant's Response to ExA's Request for further information (Rule 17) - National Landscapes [REP6-062] are Nnot agreed.</p>	<p>NPS EN-1 Section 5.10 and NPS EN-3 Paragraphs 2.8.204 -2.8. 217.</p> <p>A technical note (the Applicant's Response to ExA's Request for further information (Rule 17) - National Landscapes [REP6-062]) has been prepared in response to the Examining Authority's Rule 17 Request for Further Information [PD-014], dated 6 June 2025. This asked the Applicant to consider specific additional measures to further the purposes of the SECHNL, in line with the duty set out in the Levelling Up and Regeneration Act 2023.</p> <p>The Rule 17 Request further asked the Applicant to consider without prejudice "principles to form the basis for the development and delivery of a National Landscape Enhancement Scheme". These have been provided and the document updated at Deadline 8 to reflect discussions held with the partnership [Document ref: 9.89, (rev 1)].</p> <p>The Applicant's position remains that it has discharged the duty and that the Scheme remains without prejudice to this position.</p> <p>See the following application documents:</p>

<u>PARTY</u>	<u>SoCG ID</u>	<u>TOPIC</u>	<u>ITEM</u>	<u>SUMMARY OF NOT AGREED MATTERS</u>	<u>APPLICANT COMMENT</u>
					<ul style="list-style-type: none"> Applicant's Response to ExA's Request for further information (Rule 17) - National Landscapes [REP6-062] and [Document ref: 9.89, (rev 1)]/
<u>Commercial Fisheries Working Groups CFWG</u>					
<u>Commercial Fisheries Working Groups CFWG</u>	<u>1</u>	<u>Commercial Fisheries</u>	<u>Baseline</u>	<p>The Applicant considers that sufficient data has been gathered to appropriately characterise the commercial fisheries baseline for the EIA, as presented in ES Chapter 14 [APP-028].</p> <p>However, the Commercial Fisheries Working Group (CFWG) position remains that the data does not adequately reflect their fishing activity.</p>	<p>NPS EN-3 Paragraphs 2.8.152 – 2.8.164.</p> <p>The Applicant notes that the Commercial Fisheries Working Groups have opposed in principle the applicant's methodology, data, and conclusion on the assessment of effects relating to commercial fisheries.</p> <p>Whilst the Applicant has sought to engage with all parties equally it has found it challenging to get feedback or discuss issues with the CFWG in such a way that any progression on matters can be demonstrated.</p>
<u>Commercial Fisheries Working Groups CFWG</u>	<u>2</u>	<u>Commercial Fisheries</u>	<u>Methodology</u>	<p>The Applicant considers the impact assessment methodology used in Chapter 14 Commercial Fisheries [APP-028] to be appropriate.</p> <p>However, the Commercial Fisheries Working Group (CFWG) does not agree with the methodology used to inform the assessment.</p>	<p>The Applicant's position remains that the effects recorded in ES Chapter 14 Commercial Fisheries are not significant and that the Project is consistent with the requirements of NPS EN-3.</p> <p>See the following application documents:</p>
<u>Commercial Fisheries Working Groups CFWG</u>	<u>3</u>	<u>Commercial Fisheries</u>	<u>Conclusions</u>	<p>The Applicant considers the conclusions on construction, operation, and decommissioning impacts in Section 14.6.1 to 14.6.3 of Chapter 14 Commercial Fisheries [APP-028] to be appropriate.</p> <p>However, the Commercial Fisheries Working Group (CFWG) does not believe the EIA reflects the nature of their vessels or businesses, and therefore mutual agreement on the conclusions is currently not possible.</p>	<ul style="list-style-type: none"> Environmental Statement Chapter 14: Commercial Fisheries [APP-028] Environmental Statement Chapter 14: Figures [APP-059] -Environmental Statement Appendix 14.1: Commercial Fisheries Technical Report [APP-105] -Environmental Statement Chapter 11: Fish and Shellfish Ecology [APP-025]
<u>Commercial Fisheries Working Groups CFWG</u>	<u>5</u>	<u>Commercial Fisheries</u>	<u>Cumulative Methodology</u>	<p>The Applicant considers the cumulative impact assessment methodology appropriate and consistent with the Project-Alone approach.</p> <p>However, the Commercial Fisheries Working Group (CFWG) is not content with the Project-Alone methodology and, as a result, also</p>	<ul style="list-style-type: none"> -Environmental Statement Chapter 11: Figures [APP-056] -Environmental Statement Appendix 11.1: Fish and Shellfish Ecology Technical Report [APP-095]

<u>PARTY</u>	<u>SoCG ID</u>	<u>TOPIC</u>	<u>ITEM</u>	<u>SUMMARY OF NOT AGREED MATTERS</u>	<u>APPLICANT COMMENT</u>
				disagrees with the cumulative assessment methodology.	
<u>Commercial Fisheries Working Groups CFWG</u>	<u>6</u>	<u>Commercial Fisheries</u>	<u>Cumulative Conclusions</u>	<p>The Applicant considers the conclusions in Section 14.7.3 of Chapter 14 Commercial Fisheries [APP-028] appropriate, stating the Project will not significantly contribute to cumulative impacts due to its location and characteristics.</p> <p>However, the Commercial Fisheries Working Group (CFWG) disagrees, citing concerns with the cumulative assessment methodology and highlighting that the Inner and Outer Thames region is already heavily spatially restricted, with increasing adverse effects on the regional and wider fishing industry.</p>	
<u>Commercial Fisheries Working Groups CFWG</u>	<u>8</u>	<u>Commercial Fisheries</u>	<u>Embedded Mitigation</u>	<p>The Applicant considers the embedded mitigation measures outlined in Section 14.3.3 of Chapter 14 Commercial Fisheries [APP-028] and Table 4.1 of the Outline Fisheries Liaison and Coexistence Plan [APP-244] to be effective in reducing impacts on commercial fishing. These measures have been factored into the assessment of impact significance.</p> <p>The CFWG is concerned that the target minimum burial depth is not sufficient, and believe that the cables will become exposed, as appears to be common in the Outer Thames Estuary.<i>[CFWG to comment/provide specific input]</i></p>	
<u>Commercial Fisheries Working Groups CFWG</u>	<u>9</u>	<u>Commercial Fisheries</u>	<u>Embedded Mitigation (Relocation of Static Gear and Multi-Method Fishing Impacts)</u>	<p>The Applicant states that, where relocation of static fishing gear is necessary, procedures in the Fisheries Liaison and Coexistence Plan (FLCP), aligned with FLOWW guidance, will be followed.</p> <p>However, the Commercial Fisheries Working Group (CFWG) notes that all its represented vessels are multi-method (using both static and mobile gear) with limited operational ranges,</p>	

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				and will be impacted by survey and cable installation works regardless of gear type.	
<u>Commercial Fisheries Working Groups CFWG</u>	<u>10</u>	<u>Commercial Fisheries</u>	<u>Fisheries Liaison and Coexistence Plan</u>	<p>The measures outlined in the Outline Fisheries Liaison and Coexistence Plan [APP-244] are appropriate for liaison and consultation with the fishing industry throughout the lifetime of the Project.</p> <p>The CFWG has highlighted points of concern regarding the Outline FLCP [APP-244], including questioning the Developer's experience in the Outer Thames Estuary and the consultation methods employed.</p>	
<u>Commercial Fisheries Working Groups CFWG</u>	<u>13</u>	<u>Commercial Fisheries</u>	<u>Fishing vessel movements</u>	<p>It is the Applicant's position that the commitment for vessels to give way to mobile fishers operating in the area during surveys will minimise disruption to vessels actively engaged in fishing. However, it is not practicable for this commitment to extend into the construction phase.</p> <p>The CFWG believe that during survey and construction works, fishing vessels actively engaged in fishing should be given priority over survey vessels using towed survey equipment, unless COLREGs need to be applied for safety reasons.</p>	
<u>Essex County Council and Tendring District Council</u>					
<u>Essex County Council and Tendring District Council</u>	<u>Table 2.1 ID 5</u>	<u>Site Selection and Assessment of Alternatives</u>	<u>Cumulative impact of substations near Ardleigh</u>	<p>North Falls has selected its site based on the assessment in ES Chapter 4 Site Selection and Assessment of Alternatives [APP-018]. By locating the onshore substation close to the National Grid East Anglia Connection Node (EACN) substation, it reduces the amount of equipment required, particularly reactors and harmonic filters conditioning the power being transferred to the national grid.- If a different location for the onshore substation would have been selected, further away from the EACN substation, the equipment would need to get larger and thereby have more impact on the</p>	<p>Relevant NPS Paragraphs:- NPS EN-3 2.8.11 - -2.8.13</p> <p>This approach is consistent with NPS EN-1 (2.8.48) and NPS EN-3 (Paragraph 2.8.63) which sets the expectation that greater coordination of offshore-onshore transmission infrastructure is likely to reduce the cumulative environmental impacts and impacts on coastal communities by installing a smaller number of larger connections.</p> <p>The Applicant selected the substation location based on a detailed alternatives assessment as outlined in ES Chapter 4 [APP-018]. As noted in ES Chapter 4,</p>

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				<p>local community. -Please refer to paragraph 78 of ES Chapter 4 Project Description [APP-018] for further information.</p> <p><u>ECC and TDC have raised serious objection to the N2T DCO proposal, part of which is of particular relevance to North Falls, in that the proposed connection point provided by N2T would be in Ardleigh. The Councils are of the view that there are clear and demonstrable reasons why this location is completely unacceptable in what is a flat, open rural landscape. By North Falls NF constructing its own independent substation, linking to the current proposed Grid connection point at Ardleigh, it would contribute to the cumulative effects both during the construction phase and when built. In the Councils' view, North Falls NF as a project seeks consent for its own substation before connection to the Grid substation, this will result in the provision of significantly harmful industrial type infrastructure in an open, tranquil rural area from from N2T, North Falls and in addition from Five Estuaries, another similar DCO proposal.</u></p>	<p>paragraph 78 [APP-018], a more distant location would require larger equipment, increasing effects on the local community.</p> <p>See the following application documents:</p> <ul style="list-style-type: none"> • <u>-Environmental Statement Chapter 4: Site Selection and Assessment of Alternatives (see paragraph 78) [APP-018]</u> • <u>Environmental Statement Chapter 5: Project Description [APP-019]</u> • <u>-Environmental Statement Chapter 27: Traffic and Transport [APP-041]</u> • <u>-Environmental Statement Chapter 30: Landscape and Visual Impact Assessment [APP-044]</u> • <u>-Environmental Statement Chapter 22: Land Use and Agriculture [APP-036]</u> • <u>Co-ordination Report (Rev 2) [REP1-004]</u>
<u>Essex County Council and Tendring District Council</u>	<u>Table 2.5 ID 9</u>	<u>Onshore Archaeology and Cultural Heritage</u>	<u>Assessment of Archaeological Impacts and Mitigation Strategy</u>	<p><u>ECC/TDC's position is that the current level of investigation is insufficient to fully understand the significance of affected heritage assets. ECC calls for further assessment to ensure impacts on known and unknown archaeological remains can be effectively managed.</u></p>	<p><u>Relevant NPS EN-1 Paragraphs 5.9.9 – 5.9.21.</u></p> <p><u>The Applicant considers that the archaeological assessment presented in ES Chapter 25, Section 25.6 [APP-039] is proportionate and robust. It draws on an evidence base which has informed a clear understanding of the archaeological potential and underpins the mitigation strategy set out in the Outline Onshore Written Scheme of Investigation.</u></p> <p><u>While the Applicant acknowledges that some uncertainty is inherent in archaeological assessment, the approach taken aligns with best practice and provides a sound basis for managing both known and potential heritage assets. Further investigation and mitigation will be secured through the WSI and implemented post-consent in consultation with relevant authorities.</u></p>

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					<p>The Applicant's position remains that the approach to the assessment is compliant with the NPS EN-1 and potential impacts on the significance of the assets will be appropriately managed through the DCO Requirements.</p> <p>These points notwithstanding, during the DCO Examination the Applicant has subsequently agreed to 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. This is contained within an Archaeological Mitigation Strategy [REP5-046 to REP5-048], an updated the Outline Onshore WSI [REP5-016 to REP5-021], and amendments to the Draft DCO [REP7-008], wording with regards to Requirement 11 to ensure that pre-construction mitigation will adhere to the Archaeological Mitigation Strategy, all of which were submitted into the Examination at Deadline 5. Following consultation on these documents with ECC and Historic England, it has been agreed between the parties that these documents and the Draft DCO amendments are sufficient to ensure that adequate baseline data is collected for the Project prior to the commencement of construction. The residual point of disagreement therefore remains only about whether the baseline presented in the ES originally was sufficient.</p> <p>See the following application documents:</p> <ul style="list-style-type: none"> • <u>Environmental Statement Chapter 25: Onshore Archaeology and Cultural Heritage [APP-039]</u> • <u>Archaeological Mitigation Strategy [REP5-046 to REP5-048]</u> • <u>Outline Onshore Written Scheme of Investigation [REP5-016-21]</u>
<u>Essex County Council and Tendring District Council</u>	<u>Table 2.6 ID 7</u>	<u>Noise and Vibration</u>	<u>Scope of High Impact Construction Activities</u>	<u>The Applicant defines "high impact" activities in Section 1.3.1 of the OCoCP [REP7-025] as including piling, breaking out, vibratory compaction, and use of hydraulic hammers—excluding general construction equipment like excavators, cranes, saws, sanders, and grinders. This definition will be revisited in the</u>	<p>Relevant NPS Paragraphs: EN-1 Section 5.12.13 – 5.12.16.</p> <p>The Applicant notes ECC's request to expand the definition of "high impact" construction activities. As stated in the Outline Code of Construction Practice [REP7-025], this definition will be revisited during development of the</p>

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				<p>final CoCP (secured under Requirement 8 of the dDCO [REP7-008]) once a Principal Contractor is appointed.</p> <p>The Councils request that the definition be expanded to include noise-intensive machinery such as excavators and grinders to better protect local amenity.</p>	<p>final CoCP, secured under Requirement 8 of the dDCO [REP7-008], once a Principal Contractor is appointed. The Applicant remains committed to ensuring appropriate mitigation measures are in place to protect local amenity.</p> <p>The Applicant's position remains that such details can be adequately dealt with via the Requirement 8 of the DCO and that the detail provided at this stage is sufficient to understand the likely effects from noise including the adequacy of mitigation secured through the CoCP.</p> <p>See the following application documents:</p> <ul style="list-style-type: none"> -Outline Code of Construction Practice (Rev 5) [REP7-025] Draft Development Consent Order (Rev 8) [REP7-008]
<u>Essex County Council and Tendring District Council</u>	<u>Table 2.6 ID 8</u>	<u>Noise and Vibration</u>	<u>Construction Working Hours and Noise Mitigation</u>	<p>The Applicant states that all noise and vibration mitigation measures are secured through the Draft DCO and that working hours (7am–7pm) are clearly defined in the Outline Code of Construction Practice (OCoCP) [REP7-025].</p> <p>TDC objects, preferring 8am–6pm hours due to cumulative impacts from multiple NSIPs. TDC also raises concerns about vague exceptions for “emergency” works, lack of caps on out-of-hours activities, and unclear complaint procedures—especially in distinguishing between overlapping projects. TDC maintains that the current approach fails the NPPF tests of reasonableness and precision.</p>	<p>Relevant NPS Paragraphs: EN-1 Section 5.12.13 – 5.12.16.</p> <p>The Applicant has provided a response at Deadline 7 in response to ExQ3 Q1.0.2 within the Applicant's Response to ExA's Third Written Questions (ExQ3) [REP7-051] providing information to justify the proposed construction working hours and how they accord with the six tests relating to planning conditions (as relevant to the Requirements) such that there is sufficient controls contained within the DCO.</p> <p>See the following application documents:</p> <ul style="list-style-type: none"> Outline Code of Construction Practice (Rev 5) [REP7-025] Applicant's Response to ExA's Third Written Questions (ExQ3) [REP7-051]
<u>Essex County Council and Tendring District Council</u>	<u>Table 2.7 ID 9</u>	<u>Noise and Vibration</u>	<u>Operational Noise Complaints Protocol</u>	<p>The Applicant has submitted an updated Outline Noise Complaints Protocol [REP5-036] developed jointly with Five Estuaries and National Grid, outlining timeframes for investigating operational noise complaints.</p>	<p>Relevant NPS Paragraphs: EN-1 Section 5.12.13 – 5.12.16.</p> <p>While ECC and TDC request a joint accountability mechanism and faster timeframes, the Applicant considers the current protocol appropriate and notes that the retention of an acoustic consultant is secured for 18</p>

<u>PARTY</u>	<u>SoCG ID</u>	<u>TOPIC</u>	<u>ITEM</u>	<u>SUMMARY OF NOT AGREED MATTERS</u>	<u>APPLICANT COMMENT</u>
				<p>However, ECC and TDC concerns are that the protocol lacks a joint accountability mechanism across the three operators and that the proposed investigation timeframes are too long. They advocate for a faster, more coordinated response, including pre-arranged contracts with acoustic consultants to expedite investigations.</p>	<p>months post-commissioning. Further details will be finalised post-consent in consultation with the relevant authorities including ECC and TDC, as secured through Requirement 17(2) of the Draft DCO [REP7-008].</p> <p>The Applicant's position remains that the noise protocol is sufficient to address any operational noise complaints and that committing to shorter timeframes brings with it technical challenges to establish the source of noise issues. This accounts for instructing a noise specialist to undertake the technical assessment and allow for a window in which there are sufficient climatic conditions for noise testing to be accurate.</p> <p>See the following application documents:</p> <ul style="list-style-type: none"> Onshore Substations Operational Noise and the Outline Noise Complaints Protocol (Rev 1) [REP5-036] Environmental Statement Chapter 26: Noise and Vibration [APP-040] Outline Code of Construction Practice (Rev 5) [REP7-025]
<u>Essex County Council and Tendring District Council</u>	<u>Table 2.8 ID 3</u>	<u>LVIA</u>	<u>Barn Lane and National Landscape Viewpoints</u>	<p>The Applicant's selected viewpoints, including new Viewpoint 9 along Barn Lane, are considered appropriate for baseline assessment. However, TDC and ECC's position is that even with proposed hedgerow mitigation, the substation will remain visible—especially in winter—resulting in a loss of openness and rural character. They also note that cumulative visualisations omit the Norwich to Tilbury pylons. The Councils request additional visualisations from within the National Landscape to assess cumulative impacts and ensure alignment with statutory landscape protection duties.</p>	<p>Relevant NPS EN-1 Paragraphs - 5.10.1 – 5.10.38</p> <p>The Applicant acknowledges that Viewpoint 9 (Barn Lane – Grange Road) shows significant effects at Year 1, reducing to moderate by Year 15. While visibility through hedgerows in winter is recognised, this viewpoint lies outside the Dedham Vale National Landscape. Viewpoint 8 [APP-088] is provided as a representative view from within the National Landscape.</p> <p>The Applicant has addressed visibility and cumulative effects in ES Chapter 30 and in responses to ISH1 and ISH2 [REP4-036]. The N2T pylons are not visible from Viewpoint 9 due to existing vegetation.</p> <p>See the following application documents:</p> <ul style="list-style-type: none"> New visualisation (VP9) from Barn Lane - Grange Road [REP6-065/66]

<u>PARTY</u>	<u>SoCG ID</u>	<u>TOPIC</u>	<u>ITEM</u>	<u>SUMMARY OF NOT AGREED MATTERS</u>	<u>APPLICANT COMMENT</u>
					<ul style="list-style-type: none"> • <u>Onshore Substation Zone of Theoretical Visibility and Viewpoint Locations with Dedham Vale National Landscape (Rev 0) [REP4-047]</u> • <u>Landscape and Visual Impact Assessment Viewpoints and the Dedham Vale National Landscape Plan (Rev 0) [REP4-045]</u> • <u>Environmental Statement Chapter 30: Landscape and Visual Impact Assessment [APP-044]</u>
<u>Essex County Council and Tendring District Council</u>	<u>Table 2.8 ID 7</u>	<u>LVIA</u>	<u>Onshore Substation and Effectiveness of Mitigation</u>	<p><u>ECC notes that the open, rural landscape around Ardleigh and Lawford is highly sensitive, and even with mitigation, significant residual visual and landscape effects are expected—especially when considered cumulatively with Five Estuaries, N2T, and the Tendring Colchester Borders Garden Community. Their concern is that the proposals introduce industrial features into a flat, arable landscape, with long-term impacts on character and amenity.</u></p>	<p><u>Relevant NPS EN-1 Paragraphs - 5.10.1 – 5.10.38</u></p> <p><u>Landscape impacts are assessed in ES Chapter 30 [APP-044], with mitigation outlined in the Design Vision [REP5-004] and Outline Landscape and Ecological Management Strategy [REP5-024]</u></p> <p><u>While some residual effects are expected, particularly in the open landscape around Ardleigh and Lawford, the proposed mitigation is considered appropriate. The substation location is driven by the N2T connection point, and cumulative impacts have been considered. Further detail will be developed post-consent in consultation with the discharging authority.</u></p> <p><u>See the following application documents:</u></p> <ul style="list-style-type: none"> • <u>Environmental Statement Chapter 30: Landscape and Visual Impact Assessment [APP-044]</u> • <u>Design Vision (Rev 1) [REP5-004]</u> • <u>Outline Landscape and Ecological Management Strategy (Rev 64) [REP7-027]</u> • <u>New visualisation (VP9) from Barn Lane - Grange Road [REP6-065/66]</u> • <u>Onshore Substation Zone of Theoretical Visibility and Viewpoint Locations with Dedham Vale National Landscape (Rev 0) [REP4-047]</u>

<u>PARTY</u>	<u>SoCG ID</u>	<u>TOPIC</u>	<u>ITEM</u>	<u>SUMMARY OF NOT AGREED MATTERS</u>	<u>APPLICANT COMMENT</u>
					<ul style="list-style-type: none"> <u>Landscape and Visual Impact Assessment Viewpoints and the Dedham Vale National Landscape Plan (Rev 0) [REP4-045]</u>
<u>Essex County Council and Tendring District Council</u>	<u>Table 2.8 ID 8</u>	<u>LVIA</u>	<u>Dedham Vale National Landscape</u>	<p>No significant effects are predicted on the special qualities of the Dedham Vale National Landscape (NL). The reasoning for this is set out at Section 30.5.3.2 of ES Chapter 30 Landscape and Visual Impact Assessment [APP-044].</p> <p>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> <p>The North Falls project by itself is potentially visible from additional points other than VP8, either within the NL or within its setting. The visual impacts will be escalated in combination with Five Estuaries, the East Anglian Connection Node (EACN) and the overhead lines and pylons of N2T.</p>	<p>Relevant NPS EN-1 Paragraphs - 5.10.1 – 5.10.38</p> <p>The Applicant's position remains that no significant effects are predicted on the Dedham Vale National Landscape.</p> <p>Hedgerow and woodland cover, across the relatively flat intervening landscape between the southern edge of the NL and the North Falls onshore substation, play a notable screening role (See Viewpoint 8, ES Figure 30.2.8 [APP-088])</p> <p>See the following application documents:</p> <ul style="list-style-type: none"> <u>Environmental Statement Chapter 30: Landscape and Visual Impact Assessment [APP-044]</u>
<u>Essex County Council and Tendring District Council</u>	<u>Table 2.8 ID 9</u>	<u>LVIA</u>	<u>Cumulative Impacts of the substation</u>	<p>The Applicant's position is that placing the North Falls substation near the National Grid EACN reduces infrastructure needs and local impact. Mitigation measures, including long-term planting schemes outlined in the Design Vision [REP5-004] and Outline Landscape and Ecological Management Strategy (Rev 6) [REP7-027], both of which aim to soften visual effects over time.</p> <p>However, the location—dictated by the N2T connection point—sits within a flat, open, arable landscape highly sensitive to change. Essex and Tendring Councils warn that the cumulative presence of multiple substations (North Falls, Five Estuaries, EACN, and Tarchon Interconnector) and associated pylons</p>	<p>Relevant NPS EN-1 Paragraphs - 5.10.1 – 5.10.38</p> <p>It is acknowledged that no screen planting can fully conceal a development of this nature. This planting will continue to grow beyond 15 years, over the operational life of the project, providing increased screening. Should the North Falls project gain consent, the landscape mitigation plans will be developed with further detail in line with the Outline Landscape and Ecological Management Strategy [REP7-027] which will be subject to the approval of the discharging authority.</p> <p>The Applicant's position remains that the site selection process, design, and landscape mitigation, are consistent with ensuring the visual effects of the substation are acceptable.</p>

<u>PARTY</u>	<u>SoCG ID</u>	<u>TOPIC</u>	<u>ITEM</u>	<u>SUMMARY OF NOT AGREED MATTERS</u>	<u>APPLICANT COMMENT</u>
				will result in significant, long-term industrialisation of a tranquil rural area, with residual adverse impacts on landscape character and visual amenity.	<p>See the following application documents:</p> <ul style="list-style-type: none"> • <u>Environmental Statement Chapter 30: Landscape and Visual Impact Assessment [APP-044]</u> • <u>Design Vision (Rev 1) [REP5-004]</u> • <u>Outline Landscape and Ecological Management Strategy (Rev 6) [REP7-027]</u>
<u>Essex County Council and Tendring District Council</u>	<u>Table 2.9 ID 1</u>	<u>Socioeconomics</u>	<u>Community Impacts of the North Falls Onshore Transmission Network</u>	<p>North Falls is proposed to connect to the onshore transmission network at National Grid Electricity Transmission's (NGET) proposed East Anglia Connection Node (EACN), situated north east of Little Bromley, by way of buried cables from the landfall location near Kirby Brook. ES Chapter 31 Socio-economics [AS-010] sets out the expected employment and business benefits that will be realised during North Falls' construction and while the wind farm is operational.</p> <p>ECC and TDC state that the Addendum of OSEP [REP7-057] only summarised the suggestions from the Councils, SCC and Interested Parties, but failed to provide a firm commitment or even some minimum targets of measures in relation to skills and employment. It still failed to address the Councils' concerns raised at the ISHs. There is currently nothing in the DCO submission to ensure that sufficient mitigations will be provided and transform into the claimed employment and business benefits. It is disappointing that the Applicant is unwilling to commit, before the close of examination, to some minimum targets which the Councils could begin to influence partners to start initial preparation, considering operational details and speed up their delivery.</p>	<p>Relevant NPS Paragraphs: NPS EN-1 5.13.1 – 5.13.12.</p> <p>The Applicant is maintaining a comprehensive log of all comments and proposals to ensure that feedback and requests associated with the Outline Skills and Employment Plan [APP-253] are fully captured and considered in the preparation of the final Skills and Employment Plan, which will be developed post-DCO consent. This comments log has been submitted into Examination in the Addendum to the Outline Skills and Employment Plan [REP7-057] at Deadline 7.</p> <p>At this stage of the project, detailed information, particularly regarding procurement decisions, is not yet available to provide a more granular forecast of workforce and labour demands. As noted in the Addendum to the Outline Skills and Employment Plan [REP7-057], this level of detail will be developed post-DCO consent and will inform the final Skills and Employment Plan accordingly.</p> <p>The Applicant's position remains that consultation during the development of the final Skills and Employment Plan secured under Draft DCO Requirement 18 [REP7-008] provides sufficient opportunity to include more granular information.</p> <p>See the following application documents:</p> <ul style="list-style-type: none"> • <u>Outline Skills and Employment Plan [APP-253]</u> • <u>Addendum to the Outline Skills and Employment Plan [REP7-057]</u>

<u>PARTY</u>	<u>SoCG ID</u>	<u>TOPIC</u>	<u>ITEM</u>	<u>SUMMARY OF NOT AGREED MATTERS</u>	<u>APPLICANT COMMENT</u>
<u>Essex County Council and Tendring District Council</u>	<u>Table 2.9</u> <u>2</u>	<u>Socioeconomics</u>	<u>Commitments</u>	<p>The Applicant recognises the importance of delivering social value and has prepared an Outline Skills and Employment Plan (OSEP) [APP-253], with an addendum [REP7-057], outlining themes for local employment, training, and supply chain benefits. A full Employment and Skills Plan will be secured through a DCO Requirement if consent is granted.</p> <p>ECC and TDC remain concerned by the lack of firm commitments, measurable targets, or district-specific provisions. They argue the OSEP does not adequately address economic disparities or support workforce development. The Councils request clearer labour forecasts, stronger commitments (e.g. a Skills and Innovation Fund), and reference to local initiatives like the Harwich Green Energy Hub. They are disappointed that no minimum targets have been committed to before the close of examination.</p>	<p>Relevant NPS Paragraphs: NPS EN-1 5.13.1 – 5.13.12.</p> <p>The Applicant has set out, why more detailed information including minimum targets are not appropriate at the outline stage in response to comments on ECC/TDC's response to ExQ3 16.0.3.</p> <p>Within Table 2.1 of the Addendum to the Outline Skills and Employment Plan [REP7-057], the Applicant acknowledges several interested parties' comments regarding workforce and skills projections. These include requests for more detailed, phase-by-phase workforce demand profiles by occupation, using Standard Occupational Classification codes, along with forecasts of timing, skill levels, and indicative geographic sourcing. Interested parties also asked for estimates of the non-local workforce based on supply chain and contractor commitments, as well as assessments of labour mobility and accommodation needs by role type. In response to concerns about workforce competition, the Applicant notes that strategies will be developed in collaboration with Interested parties.</p> <p>The Applicant maintains that further details are not available at this stage of the Project's design development, however, as the Project progresses and more detailed design and procurement data become available, a more granular breakdown of workforce and skills projections will be possible and will be shared with interested parties once known. A key next step in reaching this point involves further discussions with Five Estuaries to ensure coordination and alignment between the two projects where practicable.</p> <p>See the following application documents:</p> <ul style="list-style-type: none"> • <u>Outline Skills and Employment Plan [APP-253]</u> • <u>Addendum to the Outline Skills and Employment Plan [REP7-057]</u> • <u>Environmental Statement Chapter 31: Socio-economics [AS-010]</u>

<u>PARTY</u>	<u>SoCG ID</u>	<u>TOPIC</u>	<u>ITEM</u>	<u>SUMMARY OF NOT AGREED MATTERS</u>	<u>APPLICANT COMMENT</u>
<u>Essex County Council and Tendring District Council</u>	<u>Table 2.10</u> <u>ID 1</u>	<u>Tourism and Recreation</u>	<u>Impacts</u>	<p>ES Chapter 32 Tourism and Recreation [APP-046], in particular Section 32.5.6, discusses a wide range of evidence about the impacts of offshore wind farm construction and operation on tourism and finds no evidence to indicate a relationship between construction and an overall reduction in visitor numbers and spending. Recognising that the sector is a key part of Tendring's economy and that of the wider area, it assesses the impact as minor, adverse, which is not significant in EIA terms.</p> <p>The assessment considers the potential impacts of temporary closures or diversions of rights of way, air quality, noise and vibration, construction road traffic and visual impacts, noting that the combination of mitigation measures proposed by the applicant and the temporary duration of the construction process would limit the impacts to short-term changes in behaviour in the local area (see Section 32.6.1, ES Chapter 32 Tourism and Recreation [APP-046])</p> <p>While the Councils acknowledged that the impacts on tourism are not significant in EIA terms to warrant refusal of the DCO on its own, they consider it does not mean the development itself does not impose detrimental impacts on the district's tourism, in particular during construction stage of the project itself as well as the cumulatively with other NSIPs in the area.</p>	<p>Relevant NPS Paragraphs: NPS EN-1 5.13.1 – 5.13.12.</p> <p>As set out in ES Chapter 32: Tourism and Recreation [APP-046] and reiterated in the Applicant's Response to REP6-081 o [REP7-053], the assessment concluded that the Project would not result in significant effects on tourism. Therefore, no additional mitigation or compensation measures are proposed.</p> <p>While the Applicant acknowledges the importance of tourism to the local economy, meaningful monitoring would require complex, long-term studies. One-off surveys are unlikely to yield reliable data. In the absence of evidence contradicting the ES findings, the Applicant maintains that further tourism-specific measures are not justified.</p> <p>See the following application documents:</p> <ul style="list-style-type: none"> • <u>Environmental Statement Chapter 32: Tourism and Recreation [APP-046]</u>
<u>Essex County Council and Tendring District Council</u>	<u>Table 2.11</u> <u>ID 1</u>	<u>Cumulative Effects Assessment</u>	<u>Dependency on EACN</u>	<p>North Falls is an independent project but relies on the unconsented EACN, part of National Grid's N2T scheme, for grid connection. While the Applicant outlines alternative options in ES Chapter 4 [APP-018], ECC argues the project is premature without certainty over EACN's delivery. ECC calls for a phasing (Grampian-style) requirement to ensure North Falls and Five Estuaries proceed only if EACN is</p>	<p>Relevant NPS Paragraphs: NPS EN-3 2.8.11 - 2.8.13</p> <p>The Applicant acknowledges that the EACN scheme is currently unconsented. However, the Applicant holds a signed grid connection agreement with NESO, which allows for connection via EACN or an alternative.</p> <p>The proposed Grampian-style requirement is not considered necessary, introducing delays and risk to the</p>

<u>PARTY</u>	<u>SoCG ID</u>	<u>TOPIC</u>	<u>ITEM</u>	<u>SUMMARY OF NOT AGREED MATTERS</u>	<u>APPLICANT COMMENT</u>
				<p><u>approved. Concerns include delays to N2T, legal risks, and lack of a coordinated approach across multiple NSIPs.</u></p>	<p>Project's delivery timeline. Accordingly, the Applicant submits that a Grampian-style requirement fails to meet the relevant legal tests for a DCO Requirement. The Applicant notes that Responsibility for securing grid connection lies with NESO, and the Applicant has assessed all reasonable alternatives in ES Chapter 4 [APP-018].</p> <p>See the following application documents:</p> <ul style="list-style-type: none"> • <u>Cable Statement (Rev 1) [REP4-015]</u> • <u>Environmental Statement Chapter 4 Site Selection and Assessment of Alternatives [APP-018]</u> • <u>Applicant's Response to ExA's Second Written Questions (ExQ2) [REP5-054]</u> • <u>Applicant's Response to ExA's Third Written Questions (ExQ3) [REP7-051]</u> • <u>Applicant's Response to Deadline 6 Submissions [REP7-053] and other similar response documents.</u>
<u>Essex County Council and Tendring District Council</u>	<u>Table 2.11 ID 2</u>	<u>Cumulative Effects Assessment</u>	<u>Offshore Transmission Coordination and Exploration of Alternatives</u>	<p><u>North Falls has actively engaged in the Offshore Transmission Network Review (OTNR) and the Offshore Coordination Support Scheme (OCSS), but no third party is currently promoting a coordinated offshore cable solution for its grid connection Option 3 has come forward.</u></p> <p><u>ECC / TDC assert that developers have not provided comprehensive evidence that offshore alternatives have been fully explored to reduce the impact of onshore infrastructure in Essex. They support an integrated offshore approach to help meet the UK's net zero targets.</u></p>	<p><u>Relevant NPS Paragraphs: NPS EN-3 2.3.1-2.3.9</u></p> <p><u>North Falls has actively participated in the Offshore Transmission Network Review (OTNR) and the Offshore Coordination Support Scheme (OCSS). While Option 3—an offshore grid connection—remains within the Project's design envelope, no third party is currently promoting a coordinated offshore solution that would be viable within the required delivery timeframe.</u></p> <p><u>The Applicant acknowledges ECC and TDC's support for a coordinated offshore approach and their concerns about onshore impacts. However, all reasonable alternatives have been assessed in ES Chapter 4 [APP-018], and the current grid connection strategy reflects the needs of the Project for viable and deliverable onshore connection.</u></p> <p>See the following application documents:</p> <ul style="list-style-type: none"> • <u>Co-ordination Report [REP1-004]</u>

<u>PARTY</u>	<u>SoCG ID</u>	<u>TOPIC</u>	<u>ITEM</u>	<u>SUMMARY OF NOT AGREED MATTERS</u>	<u>APPLICANT COMMENT</u>
<u>Essex County Council and Tendring District Council</u>	<u>Table 2.11 ID 3</u>	<u>Cumulative Effects Assessment</u>	<u>Project Integration</u>	<p>A detailed cumulative effects assessment (CEA) has been carried out and reported on within each ES chapter [APP-033 to APP-047]. Both the Five Estuaries Offshore Wind Farm ('Five Estuaries') and the Norwich to Tilbury project have been considered within the CEA for each chapter. Full details of how the Applicant has co-ordinated with other developers can be found in the Co-ordination Report [AS-006].</p> <p>ECC /TDC assert that the Cumulative Impacts of this and two other associated Nationally Significant Infrastructure Projects – Five Estuaries and EACN as part of the Norwich to Tilbury upgrade - have not been fully considered. Greater integration on all these projects could negate the need for onshore transmission. The onshore elements of Tarchon Interconnector should be included in the CEA.</p>	<p>Cumulative impacts from North Falls, Five Estuaries, and other relevant NSIPs have been assessed across the Environmental Statement [APP-033 to APP-047], with coordination efforts detailed in the Co-ordination Report [REP1-004].</p> <p>For further information, please refer to the Applicant's Common Response – 004 in the Applicant's Response to Relevant Representations Received from Members of the Public [REP1-048], which details how the Applicant has coordinated with other developers.</p> <p>See the following application documents:</p> <ul style="list-style-type: none"> • <u>Co-ordination Report [REP1-004]</u> • <u>Environmental Statement [APP-033 to APP-047]</u>.
<u>Essex County Council and Tendring District Council</u>	<u>4Table 2.11 ID 4</u>	<u>Cumulative Effects Assessment</u>	<u>Securing Ongoing Coordination Between North Falls and Other NSIPs</u>	<p>The Applicant highlights that ongoing coordination with other projects—particularly Five Estuaries—is secured through the Draft DCO (Requirements 19 & 20), ES Chapter 5, and certified management plans (e.g. Design Vision, CTMP, LEMS). These documents embed collaborative construction and mitigation strategies.</p> <p>ECC and TDC's position is that the Co-ordination Report [REP1-004] is the only overarching document explicitly outlining the Applicant's responsibility to coordinate with other NSIPs and stakeholders. They maintain it should be certified within the DCO to ensure binding, long-term collaboration from design through to decommissioning.</p>	<p>Relevant NPS Paragraphs: NPS EN-3 2.3.1-2.3.9</p> <p>Coordination with other NSIPs, including Five Estuaries, is secured through the Draft DCO (Requirements 19 & 20) [REP7-008], ES Chapter 5 [APP-019], and certified documents such as the Design Vision [REP5-004], OCTMP [REP7-031], and OLEMS [REP7-027]. These embed collaborative construction and mitigation strategies.</p> <p>The Co-ordination Report [REP1-004] itself is a document which is looking retrospectively at the co-ordination and collaboration undertaken to date to inform the project design which forms the basis of the North Falls DCO application. It is not a document which secures forward looking co-ordination – this is secured through the dDCO and the certified documents outlined above. The role of certification is to identify the correct version of a document referred to in the draft DCO. Therefore certification of the Co-ordination Report [REP1-004] would not achieve the desired outcome for ECC and TDC.</p>

<u>PARTY</u>	<u>SoCG ID</u>	<u>TOPIC</u>	<u>ITEM</u>	<u>SUMMARY OF NOT AGREED MATTERS</u>	<u>APPLICANT COMMENT</u>
					<p>While ECC and TDC request certification of the Co-ordination Report [REP1-004], the Applicant's position remains that coordination commitments are already <u>effectively secured through certified documents and DCO provisions</u></p> <p>See the following application documents:</p> <ul style="list-style-type: none"> • <u>Co-ordination Report [REP1-004]</u> • <u>Environmental Statement Chapter 5: Project Description [APP-019]</u> • <u>Outline Construction Traffic Management Plan [REP7-031]</u> • <u>Outline Landscape and Ecological Management Strategy [REP7-027]</u> • <u>Design Vision [REP5-004]</u> • <u>draft Development Consent Order (Rev 8) [REP7-008]</u>
<u>Harwich Haven Authority</u>					
<u>Harwich Haven Authority</u>	<u>3 (note item is in discussion)</u>	<u>Shipping and Navigation</u>	<u>Future Case Scenario</u>	<p>The NRA [APP-106], [APP-107], [APP-108] and ES Chapter [APP-029] have assessed a worst-case future scenario. Mitigation measures for cable installation, burial, and protection ensure impacts are reduced to <u>ALARP (As Low As Reasonably Practicable)</u>.</p> <p>HHA have not commented directly.</p>	<p>Relevant NPS EN-3 Paragraphs 2.8.178 – 2.8.195.</p> <p>The Applicant's position is that the NRA was robust and the Applicant has agreed to install cables to the depths requested by HHA in the Sunk Pilotage area.</p> <p>See the following application documents:</p> <ul style="list-style-type: none"> • <u>Navigational Risk Assessment Volumes 1–3 [APP-106], [APP-107], [APP-108]</u> • <u>Environmental Statement Chapter 14: Shipping and Navigation [APP-029]</u>
<u>Harwich Haven Authority</u>	<u>5b</u>	<u>Shipping and Navigation</u>	<u>Concurrent Working</u>	<p>The Applicant considers the commitment to concurrent working sufficiently secured in the Outline Navigation and Infrastructure Plan [REP6-040].</p>	<p>Relevant NPS EN-3 Paragraphs 2.8.178 – 2.8.195.</p> <p>The Applicant confirms that its commitment to concurrent working is secured within the certified Outline Navigation and Installation Plan [REP6-040], which includes coordination measures relevant to the Sunk area. These</p>

<u>PARTY</u>	<u>SoCG ID</u>	<u>TOPIC</u>	<u>ITEM</u>	<u>SUMMARY OF NOT AGREED MATTERS</u>	<u>APPLICANT COMMENT</u>
				<p>HHA requests that specific limitations on concurrent operations near the Sunk area be formally included within the DCO's Protective Provisions, rather than in associated documentation.</p>	<p>provisions are subject to MMO approval and enforceable under the DML.</p> <p>The Applicant considers this approach sufficient and proportionate. Embedding further detail within the DCO's Protective Provisions would duplicate existing controls and is therefore unnecessary.</p> <p>See the following application documents:</p> <ul style="list-style-type: none"> • <u>Outline Navigation and Installation Plan (Rev 2) [REP6-040]</u>
<u>Harwich Haven Authority</u>	<u>7b</u>	<u>Shipping and Navigation</u>	<u>Concurrent Working</u>	<p>The Applicant considers the commitment to concurrent working, as set out in the Outline Navigation and Installation Plan [REP6-040], to be sufficiently secured.</p> <p>HHA requests that specific controls be included in the DCO to prevent overlapping Restricted Ability to Manoeuvre (RAM) operations in the Sunk area, particularly in coordination with the Five Estuaries and National Grid Sea Link projects.</p>	<p>Relevant NPS EN-3 Paragraphs 2.8.178 – 2.8.195.</p> <p>The Applicant confirms that its commitment to concurrent working is secured within the certified Outline Navigation and Installation Plan [REP6-040], which includes coordination measures to avoid overlapping Restricted Ability to Manoeuvre (RAM) operations in the Sunk area.</p> <p>The Applicant considers this approach sufficient and enforceable under the DML, and does not consider it necessary to duplicate these controls within the DCO's Protective Provisions.</p> <p>See the following application documents:</p> <p>—<u>Outline Navigation and Installation Plan (Rev 2) [REP6-040]</u>—</p>
<u>Harwich Haven Authority</u>	<u>7c (note item listed as in discussion)</u>	<u>Shipping and Navigation</u>	<u>Exclusion Zones and Access</u>	<p>The Applicant confirms it cannot impose formal exclusion zones but may apply advisory safe passing distances, to be discussed with ports through HAZOPs as outlined in [REP6-040]. Harwich Haven Authority responded that no exclusion zones should be established in the Sunk area or channel that could restrict continuous vessel access or pilot boarding operations.</p> <p>HHA assert that the Exclusion zone(s) must not be put in place in the Sunk area or channel</p>	<p>Relevant NPS EN-3 Paragraphs 2.8.178 – 2.8.195.</p> <p>The Applicant refers to the MCAs comments in [REP7-081], where the MCA states that “The Applicant will not have the authority to establish mandatory exclusion zones in the Sunk area or channel. Exclusion zones are established under separate legislation e.g. Merchant Shipping Act 1995, therefore it is not necessary to include it within the DCO.”</p> <p>See the following application documents:</p>

<u>PARTY</u>	<u>SoCG ID</u>	<u>TOPIC</u>	<u>ITEM</u>	<u>SUMMARY OF NOT AGREED MATTERS</u>	<u>APPLICANT COMMENT</u>
				that would restrict 24/7/365 vessel access requirements or pilot boarding operations etc.	<ul style="list-style-type: none"> • <u>Outline Navigation and Installation Plan (oNIP, Rev 2) [REP6-040]</u> • <u>Maritime and Coastguard Agency Responses to ExQ3 [REP7-081]</u>
<u>Harwich Haven Authority</u>	<u>7d (note item listed as in discussion)</u>	<u>Shipping and Navigation</u>	<u>Safety Zones</u>	<p><u>The Applicant confirms that statutory safety zones are limited to wind turbines and substations, and will not overlap with Deep Water Routes or pilot boarding areas. Advisory safe passing distances will be used and discussed with ports via HAZOPs, as outlined in [REP6-040]. HHA responds that safety zone must not interfere with vessel movements or pilot operations in the Sunk area.</u></p> <p><u>HHA assert that Safety zone(s) must not impede vessel traffic movements within the Sunk area or normal operations such as pilot boarding</u></p>	<p><u>Relevant NPS EN-3 Paragraphs 2.8.178 – 2.8.195.</u></p> <p><u>The Applicant refers to the MCAs comments in Responses to ExQ3 [REP7-081], where the MCA states that “safety zones may be established around wind turbines which will be outside the Sunk Precautionary Area, and therefore they will not impede vessel movements and pilot operations in the Sunk area.”</u></p> <p><u>See the following application documents:</u></p> <ul style="list-style-type: none"> • <u>Outline Navigation and Installation Plan (Rev 2) [REP6-040]</u> • <u>Maritime and Coastguard Agency Responses to ExQ3 [REP7-081]</u>
<u>Marine Management Organisation (MMO)</u>					
<u>MMO</u>	<u>1</u>	<u>DCO</u>	<u>Article 5 Benefit of the Order</u>	<p><u>The Applicant’s position is that the scope and drafting in article 5 (Benefit of the Order) of the draft DCO is appropriate.</u></p> <p><u>The MMO understands that this is drafted in a similar way to previous consents granted by the Secretary of State (SoS), however the MMO has major concerns over the wording.</u></p>	<p><u>The Applicant provided a response on this matter at Deadline 1 in the Applicant’s Responses to Relevant Representations Received from Statutory Consultees and Non Prescribed Consultees [REP1-044], Applicant’s Response to ExA’s Second Written Questions (ExQ2) [REP5-054] and response REP7-080 a1 of the the Applicant’s Response to Deadline 7 submissions (Document Reference 9.226, Rev 0).</u></p> <p><u>The MMO responded on this matter in Comments on Pre-Examination Procedural Deadline Submissions, comments on the updated DCO/ Deemed Marine Licences (DMsL) and comments on the Statement of Common Ground [REP2-043] in their Additional Submission ([AS-051], ref MMO-83), and Responses to ExQ2 [REP5-054], Responses to ExQ3 [REP7-051], Comments on the ExA’s schedule of changes to the dDCO [REP7-035] and Comments on any submissions received at the previous deadline [REP7-080].</u></p>

<u>PARTY</u>	<u>SoCG ID</u>	<u>TOPIC</u>	<u>ITEM</u>	<u>SUMMARY OF NOT AGREED MATTERS</u>	<u>APPLICANT COMMENT</u>
					<p>See the following application documents:</p> <ul style="list-style-type: none"> • <u>draft Development Consent Order (Rev 8) [REP7-007]</u> • <u>Explanatory Memorandum [AS-024]</u>
<u>MMO</u>	<u>7</u>	<u>DCO</u>	<u>Fisheries Seasonal Restriction</u>	<p><u>The Applicant does not consider it necessary to condition the fisheries restriction in the DML, as the PEMP is appropriately secured in the DML and the Outline PEMP addresses the seasonal restriction, and is a certified document under the dDCO and which the PEMP will accord with.</u></p> <p><u>The MMO believes that any project restriction should be on the face of the DML as this is a clear commitment at this stage.</u></p> <p><u>The MMO does not agree that it is duplication if it is already secured within a plan, a restriction should be clear to all parties and some parties may not have access to the PEMP. The MMO notes this is now for the SoS to decide.</u></p>	<p><u>The seasonal restriction mitigation is agreed in principle (see Section 2.6, ID1 for the MMO SOCG [10.19, Rev 1].</u></p> <p><u>The Applicant maintains that conditioning the fisheries seasonal restriction within the PEMP is sufficient, which as it is secured under the DML and certified in the dDCO, is sufficient and enforceable. The Outline PEMP clearly sets out the restriction and is a certified document under the DCO which, and the final PEMP must accord with, which will be approved by the MMO, ensuring regulatory oversight.</u></p> <p><u>Duplicating this restriction in the DML is unnecessary. The certified Outline PEMP is publicly available, and the final version will be accessible to relevant stakeholders. The Applicant considers this approach proportionate and consistent with established practice. The matter is now appropriately for the Secretary of State's determination.</u></p> <p>See the following application documents:</p> <ul style="list-style-type: none"> • <u>Applicant's Response to ExA's Second Written Questions (ExQ2) [REP5-054]</u> • <u>draft Development Consent Order (Rev 8) [REP7-007]</u> • <u>Explanatory Memorandum [AS-024]</u> • <u>Outline Project Environmental Management Plan (Rev 2) [REP6-027]</u>
<u>National Federation of Fishermen's Organisations</u>					

<u>PARTY</u>	<u>SoCG ID</u>	<u>TOPIC</u>	<u>ITEM</u>	<u>SUMMARY OF NOT AGREED MATTERS</u>	<u>APPLICANT COMMENT</u>
<u>National Federation of Fishermen's Organisations</u>	<u>10</u>	<u>Commercial Fisheries</u>	<u>Outline Fisheries Liaison and Coexistence Plan</u>	<p>The Applicant's commitment to burying offshore export cables where practicable to a target minimum burial depth of 0.6m is sufficient for minimising potential interactions between fishing gear and cables.</p> <p>The NFFO is not content that a target minimum burial depth of 0.6m is sufficient for minimising potential interactions between fishing gear and cables</p>	<p>Relevant NPS EN-3 Paragraphs 2.152 – 2.8.164</p> <p>The Applicant's position remains that 0.6m is sufficient from a technical perspective and that this depth is consistent with other wind farm developments.</p> <p>See the following application documents:</p> <ul style="list-style-type: none"> • <u>Environmental Statement Chapter 14 : Commercial Fisheries [APP-028]</u> • <u>Environmental Statement Chapter 14: Figures [APP-059]</u> • <u>Environmental Statement Appendix 14.1: Commercial Fisheries Technical Report [APP-105]</u> • <u>Environmental Statement Chapter 11: Fish and Shellfish Ecology [APP-025]</u> • <u>Environmental Statement Chapter 11: Figures [APP-056]</u> • <u>Environmental Statement Appendix 11.1: Fish and Shellfish Ecology Technical Report [APP-059]</u>
<u>National Trust</u>					
<u>National Trust</u>	<u>2</u>	<u>LBBG Compensation</u>	<u>Removal of Lantern Marshes</u>	<p>The National Trust notes the inclusion of a 4-hectare Lesser Black-backed Gull (LBBG) compensation site at Lantern Marsh in the Outline CIMP [REP6-011/012], based on Natural England's guidance. The Trust has stated that a site of this size would not support the conservation objectives for Lantern Marshes and does not reflect its strategic aims for the area.</p>	<p>Relevant NPS Paragraphs: NPS EN-1 5.4.39 – 5.4.55</p> <p>In light of the National Trust's position confirmed at Deadline 7, Lantern Marshes will be removed from the Outline LBBG CIMP at Deadline 8. This option has been withdrawn on that basis, although the item is listed as 'not agreed' in the SoCG on the basis that the Applicant still considers it an appropriate compensation site.</p> <p>See the following application documents:</p> <ul style="list-style-type: none"> • <u>Lesser Black Backed Gull Compensation Document [REP6-011]</u>

<u>PARTY</u>	<u>SoCG ID</u>	<u>TOPIC</u>	<u>ITEM</u>	<u>SUMMARY OF NOT AGREED MATTERS</u>	<u>APPLICANT COMMENT</u>
					<ul style="list-style-type: none"> • <u>Lesser Black Backed Gull Compensation Implementation and Monitoring Plan [REP6-013]</u>
<u>Royal Society for the Protection of Birds (RSPB)</u>					
<u>RSPB</u>	<u>4</u>	<u>Offshore Ornithology</u>	<u>HRA – Red-throated Diver and Outer Thames Estuary SPA</u>	<p>The Applicant's position is that an adverse effect on integrity of red throated diver from the Outer Thames Estuary SPA can be ruled out for North Falls alone and in-combination, as described in the RIAA Part 4 [APP-178].</p> <p>The Applicant provided a response to the RSPB Relevant Representation on this matter at Deadline 1 in the Applicant's Responses to Relevant Representations Received from Statutory Consultees and Non Prescribed Consultees ([REP1-0145], Section 2.17, Applicant's Ref RSPB-09).</p> <p>The RSPB considers that an adverse effect on site integrity cannot be ruled out for the impact of distributional change on the rRed-throated Diver population, arising from vessel movement during construction, decommissioning and operations and maintenance.</p>	<p>Relevant NPS EN-3 Paragraphs 2.8.136 – 2.8.146</p> <p>The Applicant maintains that the area within the SPA that could be subject to displacement from North Falls is already subject to displacement from existing infrastructure and activities, therefore North Falls' contribution would not be material.</p> <p>While this matter is not agreed, the Applicant and RSPB will continue to engage post-consent, should compensation be required for RTD.:-</p> <p>See the following application documents:</p> <ul style="list-style-type: none"> • <u>Applicant's Responses to Relevant Representations Received from Statutory Consultees and Non-Prescribed Consultees [REP1-045]</u> • <u>Habitats Regulations Assessment – Part 4 Offshore Ornithology [APP-178]</u> • <u>Habitats Regulations Assessment Annex 3A Outline Red-Throated Diver Compensation Implementation and Monitoring Plan (Rev 1) [REP6-0174-023]</u> • <u>Habitats Regulations Assessment Appendix 3 Red Throated Diver Compensation Document (Rev 1) [REP6-0154-024]</u>
<u>RSPB</u>	<u>6</u>	<u>Offshore Ornithology</u>	<u>HRA – Kittiwake in-combination Mortality and Compensation</u>	<p>The RSPB considers that the in-combination assessment should include the collision risk values for offshore wind farms which has been consented based on a derogation case.</p> <p>The Applicant's position is that, as derogation requires the impact of these wind farms to be fully compensated, there is a resulting null impact. However, the in combination assessment for kittiwake at FFC presented in</p>	<p>Relevant NPS EN-3 Paragraphs 2.8.136 – 2.8.146</p> <p>It is the Applicant's position that all required information on the in-combination assessment is provided.</p> <p>Furthermore, compensation is provided for kittiwake from the FFC SPA. While the matter relating to the in-combination totals is not agreed, the Applicant and RSPB</p>

<u>PARTY</u>	<u>SoCG ID</u>	<u>TOPIC</u>	<u>ITEM</u>	<u>SUMMARY OF NOT AGREED MATTERS</u>	<u>APPLICANT COMMENT</u>
				<p>the RIAA Part 4 [APP-178], (section 4.4.4.5.3.2) considers the in combination totals including and excluding the predicted collision mortality of kittiwake at OWF that have been consented subject to compensation measures, so all relevant information is available in Examination.</p> <p>At paragraphs 17 and 18 in APP-192 (Habitats Regulations Assessment Appendix 4, Kittiwake Compensation Document), the Applicant reduces the annual in-combination total of Kittiwake mortalities on the basis that consented offshore wind farms have been compensated for. It also presents compensated impacts as a separate scenario. The RSPB strongly disagrees with the approach of excluding “compensated for” projects from the in-combination assessment</p>	<p>will continue to engage post-Examination regarding the compensation.</p> <p>See the following application documents:</p> <ul style="list-style-type: none"> Habitats Regulations Assessment – Part 4 Offshore Ornithology [APP-178] Annex 4A Outline Kittiwake Compensation Implementation and Monitoring Plan (Rev 2) [REP6-021] Appendix 4 Kittiwake Compensation Document (Rev 2) [REP6-019]
<u>RSPB</u>	<u>7</u>	<u>Offshore Ornithology</u>	<u>HRA – Kittiwake Displacement and Distributional Effects</u>	<p>The Applicant has followed guidance provided by Natural England during the Evidence Plan Process, which does not identify kittiwake as a species at risk of displacement effects from OWFs.</p> <p>The RSPB disagrees with Natural England and the Applicant and considers that displacement should be assessed.</p>	<p>Relevant NPS EN-3 Paragraphs: 2.8.136 – 2.8.146</p> <p>Having followed Natural England’s advice, the Applicant’s position is that all required information has been provided.</p> <p>Furthermore, compensation is provided for kittiwake from the FFC SPA. While the matter relating to displacement is not agreed, the Applicant and RSPB will continue to engage post-Examination regarding the compensation.</p> <p>See the following application documents:</p> <p>— Offshore In-Principle Monitoring Plan (Rev 2) [REP7-023]</p> <ul style="list-style-type: none"> Environmental Statement Chapter 13: Offshore Ornithology [APP-027] Habitats Regulations Assessment – Part 4 Offshore Ornithology [APP-178] Annex 4A Outline Kittiwake Compensation Implementation and Monitoring Plan (Rev 2) [REP6-021]

<u>PARTY</u>	<u>SoCG ID</u>	<u>TOPIC</u>	<u>ITEM</u>	<u>SUMMARY OF NOT AGREED MATTERS</u>	<u>APPLICANT COMMENT</u>
					<ul style="list-style-type: none"> Appendix 4 Kittiwake Compensation Document (Rev 2) [REP6-019]
<u>RSPB</u>	<u>8</u>	<u>Offshore Ornithology</u>	<u>HRA – Northern Gannet Collision Risk and Macro-avoidance</u>	<p>The Applicant's position is that aAn adverse effect on integrity of Northern Gannet from the FFC SPA can be ruled out for North Falls alone and in-combination, as described in the RIAA Part 4 [APP-178].</p> <p>The RSPB considers that an adverse effect on site integrity cannot be ruled out for the impact of combined collision and displacement mortality on the Northern Gannet population on the Flamborough and Filey Coast SPA. The application of a macro-avoidance correction factor to predicted Northern Gannet collision mortalities is a key concern of the RSPB</p>	<p>Relevant NPS EN-3 Paragraphs: 2.8.136 – 2.8.146</p> <p>As stated in the Applicant's Responses to Relevant Representations Received from Statutory Consultees and Non Prescribed Consultees [REP1-045], Section 2.17, Applicant's Ref RSPB-07, the Applicant has followed guidance provided by Natural England during the Evidence Plan Process, regarding the application of macro-avoidance for gannet.</p> <p>Natural England has further stated, in their response to the ExAQ1 [REP2-054], that at North Falls, reducing gannet densities considered in CRM was appropriate and that Natural England agrees an AEOI can be ruled out for gannet from North Falls alone and in-combination.</p> <p>See the following application documents:</p> <ul style="list-style-type: none"> RIAA Part 4 Offshore Ornithology Birds Directive Annex 1 and Migratory Species [APP-178] Applicant's Response to Relevant Representations from Statutory Consultees and Non Prescribed Consultees (Rev 0) [REP1-045]
<u>RSPB</u>	<u>10</u>	<u>Offshore Ornithology</u>	<u>HRA – Razorbill Mortality and Compensation at FFC SPA</u>	<p>It is the Applicant's position that Aan adverse effect on integrity of the FFC SPA can be ruled out for North Falls alone and in-combination, as described in the RIAA Part 4 [APP-178] with regards to razorbill.</p> <p>The RSPB considers there will be an adverse effect on site integrity on the Flamborough and Filey Coast SPA including the impact of mortality arising from distributional change on the Razorbill population. The RSPB considers compensation measures would be required for razorbill.</p>	<p>Relevant NPS EN-3 Paragraphs: 2.8.136 – 2.8.146</p> <p>†The Applicant responded on this matter at Deadline 1 in the Applicant's Responses to Relevant Representations Received from Statutory Consultees and Non Prescribed Consultees [REP1-0145], Section 2.17, Applicant's Ref RSPB-13 and RSPB-14.</p> <p>The Applicant notes that, in consenting the Hornsea Four Project, SEP&DEP and Rampion 2, the Secretary of State disagreed with RSPB's position regarding razorbill at FFC SPA and concluded that AEOI could be ruled out for those projects, alone and in-combination. Noting that the recently consented Rampion 2 has similarly small and comparable predicted impact levels to North Falls, and that North Falls was included in the Rampion 2 in-combination assessment, the Applicant considers there is substantial evidence and precedent from previous decisions of the Secretary of State</p>

<u>PARTY</u>	<u>SoCG ID</u>	<u>TOPIC</u>	<u>ITEM</u>	<u>SUMMARY OF NOT AGREED MATTERS</u>	<u>APPLICANT COMMENT</u>
					<p><u>to support ruling out AEOI beyond reasonable scientific doubt.</u></p> <p><u>The Applicant has provided without-prejudice compensation proposals for razorbill at the FFC SPA. While the matter of the conclusion of the RIAA is not agreed with regards to razorbill, the Applicant and RSPB will continue to engage post-consent, should compensation be required.</u></p> <p><u>See the following application documents:</u></p> <ul style="list-style-type: none"> <u>• RIAA Part 4 Offshore Ornithology Birds Directive Annex 1 and Migratory Species [APP-178]</u> <u>• Annex 5A Outline Guillemot and Razorbill Compensation Implementation and Monitoring Plan (Rev 2) [REP6-025]</u> <u>• Appendix 5 Guillemot and Razorbill Compensation Document (Rev 2) [REP6-023]</u> <u>— Habitats Regulations Assessment Annex 5A Outline Guillemot and Razorbill Implementation and Monitoring Plan (Rev 1) [REP1-029]</u> <u>• Habitats Regulations Assessment Appendix 5 Guillemot and Razorbill Compensation Document (Rev 1) [REP1-027]</u>
<u>RSPB</u>	<u>11</u>	<u>Offshore Ornithology</u>	<u>HRA – LBBG Compensation Site Selection and Securing Measures</u>	<p><u>Gedgrave Marshes could provide an appropriate location for lesser black backed gull compensation. Development of this site will be informed by further surveys and consultation with the LBBG compensation steering group, including RSPB.</u></p> <p><u>The RSPB has commented on the suitability of Gedgrave Marshes as a compensation site in our Written Submission (see paragraphs 6.23-6.24 REP4-089). Briefly, they regard other proposed sites to have greater potential and lesser constraints.</u></p> <p><u>They consider more detail is required about the location, design, implementation, monitoring</u></p>	<p><u>Relevant NPS EN-3 Paragraphs: 2.8.136 – 2.8.146</u></p> <p><u>Discussions will continue post-Examination to inform the development of the compensatory measure.</u></p> <p><u>See the following application documents:</u></p> <ul style="list-style-type: none"> <u>• Applicant's Response to Deadline 5 Submissions [REP6-060]</u> <u>• Annex 2A Outline Lesser Black-backed Gull Compensation Implementation and Monitoring Plan (Rev 2) [REP6-013]</u>

<u>PARTY</u>	<u>SoCG ID</u>	<u>TOPIC</u>	<u>ITEM</u>	<u>SUMMARY OF NOT AGREED MATTERS</u>	<u>APPLICANT COMMENT</u>
				and review of any proposed compensatory measures in order to provide the Secretary of State with the necessary confidence as to whether those measures can be secured and implemented with a reasonable guarantee of success so as to protect the coherence of the National Site Network.	<ul style="list-style-type: none"> Appendix 2 Lesser Black-backed Gull Compensation Document (Rev 2) [REP6-011] Habitat Regulations Assessment Lesser Black-backed Gull Compensation - Gedgrave Marshes Impact Assessment (Rev 0) [REP5-072]
<u>RSPB</u>	<u>12</u>	<u>Offshore Ornithology</u>	<u>HRA – LBBG Compensation Site Suitability and Environmental Risk</u>	<p>It is the Applicant's position that Outer Trial Bank could provide an appropriate location for lesser black backed gull compensation. Development of this site will be informed by further surveys and consultation with the LBBG compensation steering group, including RSPB.</p> <p>The RSPB has raised concerns over the suitability of Outer Trial Bank as a compensation site in our their Written Representation (see paragraphs 6.25-6.26 REP4-089). They consider there is considerable uncertainty remains over this location, both in terms of its suitability and the likely effectiveness of compensation measures there as well as their direct and indirect impacts on the wider environment, including designated sites.</p>	<p>Relevant NPS EN-3 Paragraphs: 2.8.136 – 2.8.146</p> <p>Discussions will continue post-Examination to inform the development of the compensatory measure.</p> <p>See the following application documents:</p> <ul style="list-style-type: none"> Annex 2A Outline Lesser Black-backed Gull Compensation Implementation and Monitoring Plan (Rev 2) [REP6-013] Appendix 2 Lesser Black-backed Gull Compensation Document (Rev 2) [REP6-011]
<u>RSPB</u>	<u>13</u>	<u>Offshore Ornithology</u>	<u>HRA – Collaborative LBBG Compensation and Additionality</u>	<p>The Five Estuaries (VE2) site could provide an appropriate location for lesser black backed gull compensation in collaboration with Five Estuaries. Final site selection will be discussed with the LBBG compensation steering group, including RSPB.</p> <p>The RSPB's position is that compensatory measures must be additional to measures necessary to site management of the affected SPA e.g. to restore a designated feature to favourable status (see paragraphs 5.7-5.8 of RSPB Written Submission [REP4-089]). The RSPB considers measures to restore the LBBG population of the Alde-Ore Estuary SPA should be considered as site management. This is consistent with its position on previous</p>	<p>Relevant NPS EN-3 Paragraphs: 2.8.136 – 2.8.146</p> <p>Discussions will continue post-Examination to inform the development of the compensatory measure.</p> <p>See the following application documents:</p> <ul style="list-style-type: none"> Annex 2A Outline Lesser Black-backed Gull Compensation Implementation and Monitoring Plan (Rev 2) [REP6-013] Appendix 2 Lesser Black-backed Gull Compensation Document (Rev 2) [REP6-011]

<u>PARTY</u>	<u>SoCG ID</u>	<u>TOPIC</u>	<u>ITEM</u>	<u>SUMMARY OF NOT AGREED MATTERS</u>	<u>APPLICANT COMMENT</u>
				<p>offshore wind farms adversely affecting the LBBG feature of the Alde-Ore Estuary SPA.</p> <p>Without prejudice to the overarching position, the RSPB remains in discussion with the Applicant as to the suitability of VE2 as a compensation location for LBBG.</p> <p>They note NE's comments regarding projected or collaborative delivery of compensation measures in the context of VE2 (see Ref 1, Table 4, [REP4-060]) and support their comments.</p>	
<u>RSPB</u>	<u>14</u>	<u>Offshore Ornithology</u>	<u>HRA – Red-throated Diver Compensation Measures and Securing Success</u>	<p>Compensation, if required for red-throated diver, could be delivered by rafts and/or peatland habitat management in Scotland. Development of this measure (if it is required) will be informed by further surveys and consultation with the RTD compensation steering group, including RSPB. Interim information on surveys in 2025 was provided in the Red Throated Diver Compensation Document [REP6-015/016].</p> <p>The RSPB has set out in its Written Representation (see paragraphs 6.30-6.40, [REP4-089]) its position on these measures. They consider that more detail is required about the location, design, implementation, monitoring and review of any proposed compensatory measures in order to provide the Secretary of State with the necessary confidence as to whether those measures can be secured and implemented with a reasonable guarantee of success so as to protect the coherence of the National Site Network.</p>	<p>Relevant NPS EN-3 Paragraphs: 2.8.136 – 2.8.146</p> <p>Discussions will continue post-Examination to inform the development of the compensatory measures.</p> <p>See the following application documents:</p> <ul style="list-style-type: none"> • Applicant's Responses to Relevant Representations Received from Statutory Consultees and Non-Prescribed Consultees [REP1-045] • Habitats Regulations Assessment – Part 4 Offshore Ornithology [APP-178] • Habitats Regulations Assessment Annex 3A Outline Red-Throated Diver Compensation Implementation and Monitoring Plan (Rev 1) [REP6-017] • Habitats Regulations Assessment Appendix 3 Red Throated Diver Compensation Document (Rev 1) [REP6-015]
<u>RSPB</u>	<u>16</u>	<u>Offshore Ornithology</u>	<u>HRA – Guillemot Compensation via Disturbance Reduction</u>	<p>The Applicant considers the compensation proposals for disturbance reduction at breeding colonies in the south-west is appropriate compensation for displacement of guillemot. Development of this measure will be informed by surveys being undertaken in 2025 and</p>	<p>Relevant NPS EN-3 Paragraphs: 2.8.136 – 2.8.146</p> <p>Discussions will continue post-Examination to inform the development of the compensatory measures.</p> <p>See the following application documents:</p>

<u>PARTY</u>	<u>SoCG ID</u>	<u>TOPIC</u>	<u>ITEM</u>	<u>SUMMARY OF NOT AGREED MATTERS</u>	<u>APPLICANT COMMENT</u>
				<p>consultation with the compensation steering group, including RSPB.</p> <p>The RSPB has set out in its Written Representation (see paragraphs 6.9-6.17, [REP4-089]) its position on these measures. They consider that more detail is required about the location, design, implementation, monitoring and review of any proposed compensatory measures in order to provide the Secretary of State with the necessary confidence as to whether those measures can be secured and implemented with a reasonable guarantee of success so as to protect the coherence of the National Site Network.</p>	<ul style="list-style-type: none"> Annex 5A Outline Guillemot and Razorbill Compensation Implementation and Monitoring Plan (Rev 2) [REP6-025] Appendix 5 Guillemot and Razorbill Compensation Document (Rev 2) [REP6-023]
<u>RSPB</u>	<u>17</u>	<u>Offshore Ornithology</u>	<u>HRA – Razorbill Compensation via Disturbance Reduction</u>	<p>The Applicant considers the without prejudice compensation proposals for disturbance reduction at breeding colonies in the south-west is appropriate compensation for displacement of razorbill.</p> <p>The RSPB position stands as above in ID 16.</p>	<p>Relevant NPS EN-3 Paragraphs: 2.8.136 – 2.8.146</p> <p>Discussions will continue post-Examination to inform the development of the compensatory measures.</p> <p>See the following application documents:</p> <ul style="list-style-type: none"> Annex 5A Outline Guillemot and Razorbill Compensation Implementation and Monitoring Plan (Rev 2) [REP6-025] Appendix 5 Guillemot and Razorbill Compensation Document (Rev 2) [REP6-023]
<u>Suffolk County Council</u>					
<u>Suffolk County Council</u>	<u>Table 2.3</u> <u>ID 1</u>	<u>SLVIA</u>	<u>Landscape and National Landscape Area Assessment</u>	<p>The Applicant concludes there are no significant effects on the SECHNL, citing a robust methodology aligned with best practice.</p> <p>SCC have raised concerns about how medium-scale changes to special qualities were judged to result in low overall impact. SCC also disputes the Applicant's approach relating to localised impacts in the context of the AONB.</p>	<p>Relevant NPS Paragraphs : NPS EN-3 2.8.204 – 2.8.207</p> <p>The Applicant's position is maintained that there are no likely significant effects on the Suffolk and Essex Coast and Heaths National Landscape.</p> <p>The Applicant asserts that the methodology used in ES Chapter 29 Seascape, Landscape and Visual Impact Assessment [APP-043] and Assessment of the Special Qualities of the Suffolk and Essex Coast and Heaths National Landscape and Suffolk Heritage Coast –</p>

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					<p>Technical Note [REP5-038] are robust and are in accordance with Guidelines for Landscape and Visual Impact Assessment (GLVIA3) and best practice.</p> <p>See the following application documents:</p> <ul style="list-style-type: none"> Environmental Statement Chapter 29: Seascape, Landscape and Visual Impact Assessment [APP-043]
<u>Suffolk County Council</u>	<u>Table 2.3</u> <u>2.1</u>	<u>SLVIA</u>	<u>Discharging the updated duty in s85 CRow Act 2000 duty</u>	<p>The Applicant's maintains it has fulfilled its duty under s85 of the CRow Act 2000 by taking sufficient steps to reduce impacts on the <u>Suffolk and Essex Coast and Heaths National Landscape (SECHNL)</u>.</p> <p>SCC's position differs and they assert that the Applicant has not demonstrated the necessary steps to <i>further</i> the conservation and enhancement of natural beauty under the duty. SCC highlights the lack of enhancement measures and questions the adequacy of the Applicant's approach.</p>	<p>The relevant NPS Paragraphs: NPS EN-1 5.10.8 – 5.10.9</p> <p>The Applicant has provided a full and detailed response in relation to the Applicant's position with respect to discharging the duty in the updated s85 CRow Act 2000.</p> <p>The Applicant has set out its position in multiple responses that actions taken by the Applicant to reduce impacts on the relevant National Landscapes and to give due consideration to those National Landscapes are sufficient to enable the discharge of the relevant duty by the Applicant and the Secretary of State in respect of the Project without the need for additional measures.</p> <p>The Applicant refers to the following documents which, among others, set out its position on this issue:</p> <ul style="list-style-type: none"> Position Statement on various issues relating to National Landscapes (Rev 0) [REP5-068] Applicant's Response to ExA's Request for further information (Rule 17) - National Landscapes (Rev 0) [REP6-062]; and Applicant's Response to Deadline 6 Submissions [REP7-053]. Applicant's Closing Statement [9.107 (Rev 0)]
<u>Suffolk County Council</u>	<u>2.2</u>	<u>SLVIA</u>	<u>Landscape and National Landscape Area Visual Impact of Onshore Substation on DVNL</u>	<p>The Applicant provided updated visualisations and a Zone of Theoretical Visibility (ZTV) analysis, concluding limited visibility from Dedham Vale.</p> <p>Viewpoint 8 was used for consistency, though SCC argues a closer, more exposed location</p>	<p>The Applicant has submitted a plan showing the Onshore Substation Zone of Theoretical Visibility and Viewpoint Locations with Dedham Vale National Landscape [REP4-047] at Deadline 4. The Applicant also submitted updated versions of the visualisations provided in ES Chapter 30 Figures [APP-083] to [APP-088], which show the developments considered within the cumulative effects</p>

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				<p><u>within the 2km study area was overlooked. SCC maintains that even minor visual impacts must be assessed under the s85 CRoW Act duty to conserve and enhance natural beauty, regardless of significance thresholds.</u></p>	<p><u>assessment in ES Chapter 30 Landscape and Visual Impact Assessment [APP-044], at Deadline 4. Please refer to [REP4-029] and [REP4-030]. The Applicant's position on the CRoW Act duty is set out in [REP5-068].</u></p> <p><u>Viewpoint 8 was originally identified by the Five Estuaries project as a representative viewpoint from the southern edge of the Dedham Vale National Landscape (DVNL). The North Falls team agreed to use the same viewpoint for consistency with the Five Estuaries assessment (see Five Estuaries VP9, APP-194). It is acknowledged that the North Falls ZTV indicates greater visibility along the Essex Way to the south-west. However, it is unlikely that actual visibility from this area would be significantly greater. The ZTV indicates visibility of the tallest part of the proposed development (18m lightning masts), and therefore shows theoretical visibility for locations where these elements would be visible but not the main part of the substation (maximum 13m height). Views from the areas suggested by SCC are unlikely to be more open than those from VP8, due to trees, houses and glasshouses along the A137 Harwich Road and along Hungerdown Lane. These would limit views towards the proposed development, and effects on receptors at this location are considered unlikely to be any greater than those experienced at VP8.</u></p> <p><u>The Applicant's position remains unchanged that views from the areas suggested by SCC are unlikely to be more open than those from VP8.</u></p> <p><u>See the following application documents:</u></p> <ul style="list-style-type: none"> <u>Environmental Statement Chapter 30: Landscape and Visual Impact Assessment [APP-044]</u> <u>Environmental Statement Chapter 30 : Figures [APP-083 – APP-088]</u>
<u>Suffolk County Council</u>	<u>3</u>	<u>SLVIA</u>	<u>Proposed Phasing Requirement</u>	<p><u>The Applicant's position is that any phasing restriction of the nature proposed it's unnecessary, unreasonable, and lacks precedent, potentially delaying critical infrastructure. Accordingly, the proposed phasing restriction fails the relevant legal tests</u></p>	<p><u>The Relevant NPS Paragraphs is NPS EN-3 2.8.61</u></p> <p><u>Suffolk County Council has proposed a DCO Requirement that imposes a phasing restriction on undertaking works to construct the offshore turbines until it is clear that the East Anglian Connection Node (EACN) has been consented</u></p>

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				<p><u>for a DCO Requirement and should not be imposed.</u></p> <p><u>SCC maintains the requirement meets legal tests and would not hinder early-stage works, ensuring compliance with planning policy and network readiness. SCC propose a DCO requirement to delay offshore turbine construction until the EACN is confirmed via a Grampian style phasing restriction.</u></p>	<p><u>and is to be delivered as part of the Norwich to Tilbury project. The Applicant considers that a DCO Requirement as proposed by Suffolk County Council fails the relevant legal tests for a Requirement because it is not necessary and is unreasonable:</u></p> <ul style="list-style-type: none"> <u>• There is a presumption in favour for granting consent for the Norwich to Tilbury project as set out in the relevant NPSs because it is critical national priority infrastructure. The Applicant has a connection agreement with NESO pursuant to which it is required to provide a connection and NESO has identified the EACN as the connection point.</u> <u>• The Applicant is not aware of any precedent for the imposition of a requirement of this sort and considers that there is no basis to consider the Project as ‘exceptional’ such that a requirement of this type would be justified here even though it is not normally regarded as necessary and not supported by policy in the NPS.</u> <u>• It is unreasonable to require the Applicant to wait until the proposed requirement can be discharged because this would create a significant delay to the Project making its delivery by 2030 unachievable.</u> <u>• The Applicant also has a series of decisions to make when preparing its bid for CfD, engaging with the supply chain and placing orders that would be adversely affected if it could not rely on its DCO as enabling implementation to proceed without such a restriction. This is likely to delay the implementation of urgently needed critical national priority renewable energy infrastructure and/or hamper its delivery.</u> <u>• The precedent effect of a decision to impose a condition of this type could also have wider consequences for the rapid delivery of offshore wind and the ability of the sector to meet the urgent need for increased generating capacity set out in the NPSs.</u>

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					<ul style="list-style-type: none"> The Applicant has set out in its oral submissions at ISH2 that there are many precedents for generating stations being consented at a point when the associated grid connection project was further back in the consenting process. This includes Hinkley Point C for which development consent was granted a year before the application for the related connection project was submitted. No equivalent requirement was imposed on the Hinkley Point C DCO. <p>The Applicant considers that the proposed phasing restriction does not meet the legal tests for a Requirement and therefore cannot be considered necessary to follow the requirements of the mitigation hierarchy to avoid, reduce, mitigate or compensate for adverse impacts.</p> <p>See the following application documents:</p> <ul style="list-style-type: none"> ES Chapter 29 Seascape, Landscape and Visual Impact Assessment [APP-043] Applicant's Response to ExA's Second Written Questions (ExQ2) [REP5-054] Applicant's Response to ExA's Third Written Questions (ExQ3) [REP7-051] Applicant's Response to Deadline 6 Submissions [REP7-053] and other similar response documents.
<u>Suffolk County Council</u>	<u>2</u>	<u>Socioeconomics</u>	<u>Named Consultee Request</u>	<p>SCC supports the Outline Skills and Employment Plan (OSEP) and acknowledges the Applicant's engagement. However, SCC seeks to be a <i>named</i> consultee under Requirement 18 to ensure procedural fairness and adequate consultation time. This is not sought as mitigation but to secure a formal role in shaping employment and skills outcomes in Suffolk, given its coordinating role in the region.</p>	<p>Relevant NPS Paragraphs are NPS EN-1 5.13.1 – 5.13.12</p> <p>SCC has been engaged multiple times throughout the development of the Outline Skills and Employment Plan (OSEP) [APP-253] and continues to be engaged by the Applicant in the further evolution of the SEP. This includes a request to be named as a consultee to the discharging authority for the Skills and Employment Plan. Currently, as the host authority, ECC is the discharging authority for the Skills and Employment Plan.</p>

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					<p>The Applicant is aware that SCC coordinates the various employment skills matters and activity within Suffolk, which would feed into the SEP.</p> <p>See the following application documents:</p> <ul style="list-style-type: none">• <u>Outline Skills and Employment Plan [APP-253]</u>• <u>ES Chapter 31 Socio Economics [AS-010]</u>



NORTH FALLS

Offshore Wind Farm



HARNESSING THE POWER OF NORTH SEA WIND

North Falls Offshore Wind Farm Limited

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