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Our Ref: [REDACTED]
PINS Ref: EN010119
Date: 20 March 2026
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By Email only

Dear Mr. John Wheadon,

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010

Application by North Falls Offshore Wind Farm Limited (“the Applicant”) for an Order granting Development Consent for the proposed North Falls Offshore Wind Farm (“the Proposed Development”)

I refer to your letter dated 18 February 2026 (the letter) in which the Secretary of State (SoS) invites all Interested Parties to comment on responses received to the previous request for further information (dated 28 January 2026), regarding the above Development Consent Order (DCO) application. In response, Essex County Council (ECC) in conjunction with Tendring District Council (TDC) [jointly referred as “the Councils”] would like to provide the following comments.

Response to Secretary of State Consultation 3 - 11.9 Applicant's Response to Secretary of State's Letter dated 28 January 2026 (Rev 0)

2.7 Applicant's Response to Design - Ref. 24

The Councils are still in discussions with the promoters of North Falls and Five Estuaries Windfarms on the Joint Design Guide (JDG). It is expected that the JDG will be finalised in May 2026.

2.7 Applicant's Response to Design - Ref. 25

The Councils continue to hold significant concerns regarding the cumulative impacts of the proposed road widening works associated with the Norwich to Tilbury (N2T) DCO in the context of the joint North Falls and Five Estuaries onshore substations site. At present, it remains unclear how the proposed works of the three projects will be coordinated spatially or temporally, and what the combined implications may be for the substations' layout, the

delivery of Biodiversity Net Gain (BNG), and the integrity of their respective landscape mitigation strategies.

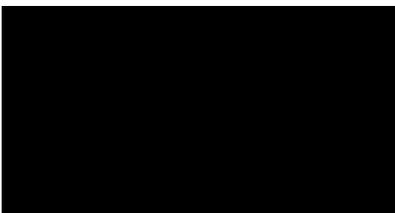
The applicant states that they are “confident that the proposed road widening works will not directly interfere with the proposed joint visual and landscaping planting along the northern side of the road, or the proposed landscape and ecological enhancement area of the North Falls and Five Estuaries projects, and therefore will not affect the conclusions on the ES.” However, no evidence has been provided to substantiate this assertion.

Based on a desktop assessment undertaken by the Councils, the potential encroachment associated with the proposed Ardleigh Road widening could affect a strip of land approximately 325 m in length and up to 25 m in depth. This equates to more than 8,000 m² of landscaping and planting area. The potential loss of land on this scale would amount to a substantial reduction from that shown in the outline landscape and ecological mitigation strategy/plan, and could materially affect the extent of BNG deliverable on-site.

Until detailed work plans and up to date landscape proposals from all three projects are overlaid and assessed together, supported by revised BNG calculations, the Councils cannot agree with the applicant’s position that the proposed road widening works would have no implications for the conclusions of the Environmental Statement. In the absence of such evidence, it is reasonable for the Councils to question whether the applicant can secure the level of BNG indicated in the DCO submissions. For this reason, it remains essential that the required BNG uplift is secured within the wording of the Requirements, to avoid the risk of significant deviation during later detailed design stages.

Furthermore, the current version of the JDG does not clearly confirm whether the proposed road widening strip, approximately 325 m in length and up to 25 m in depth, has been taken into account within the latest Landscape and Ecology Masterplan. There also appears to be a degree of conflation between the drainage easement requirements for the Norwich to Tilbury project and the land needed specifically for Ardleigh Road widening. As previously raised, these uncertainties mean that the Councils cannot be confident that the implications of these works would not affect the conclusions of the Environmental Statement.

Yours sincerely,



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