



Planning Inspectorate
 c/o QUADIENT
 69 Buckingham Avenue
 Slough
 SL1 4PN

10 June 2026

Interested Party Reference: [REDACTED]
 VE Ref: 006977126-01

Dear Sir / Madam,

National Grid Norwich to Tilbury Project (EN020027) - Five Estuaries Offshore Wind Farm Deadline 5 Submission

This letter provides Five Estuaries Offshore Wind Farm Ltd’s (Five Estuaries) responses to the Examining Authority’s Written Questions 2 issued on 22 May 2026 and is its Deadline 5 submission for the Norwich to Tilbury Project (the Project) examination. Specifically Five Estuaries was asked to respond to GEN 2.4 and BIO 2.15.

Ref	Question Text	Five Estuaries Response
GEN 2.4	<p>Report on interrelationship with other infrastructure projects</p> <p>The ExA notes that the latest cut-off date for other existing and approved developments in the cumulative assessment is currently 31 January 2026 (Environmental Statement (ES) Chapter 17 - Cumulative Effects - Response Update [REP4-163], see also question GEN 2.5 below). However, the final version of the interrelationship report [REP4-296] should include, as far as possible, the most up-to-date position relating to the progress of other approved and pending development proposals in a summary ‘at a glance’ document.</p> <p>The applicant is asked to:</p>	<p>Five Estuaries has no comments to make on 8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP4-296].</p>

	<ul style="list-style-type: none"> ensure its final interrelationship report to be submitted at deadline 7 is consistent with ES chapter 17 and [REP4-163] include an indication of the location of Tasway Energy Park (DCO 17) in table 2.1 of the next version of the report (the ExA notes that this proposal is not included in the plans due to the infancy of its design development) and, if available, an indication of its submission date to the Planning Inspectorate. <p>All local authorities, and IPs who are listed in the interrelationship report, are asked to:</p> <ul style="list-style-type: none"> Review the interrelationship report [REP4-296] and confirm if the updated position on approved and proposed developments is, to the best of your knowledge, accurate and to provide any further comments if you wish. 	
<p>BIO 2.15</p>	<p>Impact of the proposed development on Five Estuaries and North Falls Offshore Wind Farms</p> <p>The ExA notes that the Order granting approval for the North Falls Offshore Wind Farm was made by the Secretary of State on 14 May 2026. As indicated by the applicant in Table 6.1 of the Report on Interrelationship with Other Infrastructure Projects [REP4-296] the proposed development would potentially impact on the mitigation/enhancement/BNG measures that have been proposed for some other projects. In relation to both Five Estuaries and North Falls Offshore Wind Farms the applicant states in Table 6.1 that “The Project interacts with the ... mitigation area, but sufficient coordination is secured between the two projects to minimise any impacts.” Five Estuaries and North Falls are requested to provide comments on this.</p>	<p>Five Estuaries is content that appropriate levels of cooperation are secured through a private tripartite cooperation agreement between the parties. This covers the proposed interactions of the Applicant’s proposed Ardleigh Road widening and operational drainage works on Five Estuaries’ mitigation and enhancement area. . Co-operation between Five Estuaries and the Norwich to Tilbury Project has taken place in line with good practice and the policy considerations in the Energy NPS’ particularly EN-5 which requires that “2.14.2 the construction planning for the proposals has been co-ordinated with that for other similar projects in the area on a similar timeline;”. Particularly, Five Estuaries, National Grid and the North Falls Offshore Wind Farm project have been co-operating since the announcement of the grid connection points in 2022 with the objectives of reducing cumulative impacts particularly in relation to traffic and transport (including for construction traffic and</p>

		<p>site access), landscape and visual and operational noise. Reciprocal protective provisions have been agreed between both parties and are included in the respective DCO's. These provisions provide each undertaker sufficient protection from overlapping development consent and compulsory acquisition powers providing sufficient assurance to each Examining Authority and the Secretary of State that each DCO can be granted as sought, as demonstrated by the granting of the Five Estuaries and North Falls DCOs.</p>
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Comments on Deadline 4 submissions

Five Estuaries notes that the Applicant has provided an agreed updated version of the Onshore Substations Operational Noise and Outline Noise Complaints Protocol (the Noise Protocol) (see Appendix B.2 of the Interrelationships Report [REP4-296].

Five Estuaries notes a number of concerns raised in their deadline 4 responses by Tendring District Council – [REP4-337] Pages 10 to 13 and Essex County Council [REP4-328] Item 4 para 5.11 to 5.13 on the approach proposed through the complaints procedure particularly in relation to the time taken to investigate a breach following a complaint.

Five Estuaries notes that the Noise Protocol is an outline document and the draft DCO Requirement requires a final protocol to be submitted to and approved by the discharging authority. The outline is not a document intended to inform the public, it is intended to guide the production of the final protocol which will be submitted. The criticisms made by the Councils that it is too technical are therefore considered to be inappropriate and misconceived. This is not an FAQ for the public, it is a technical control document and it is appropriate that the content reflects that.

The final version of the Noise Protocol will include timeframes that are approved by the discharging authority and considered achievable by each substation operator. The Applicant does not consider it necessary to finalise these details prior to DCO consent, as the primary purpose of the Noise Protocol will be to identify the method by which a complaint would be investigated.

Five Estuaries also notes that the operational noise level limits proposed by the projects are very low; substation noise is unlikely to be audible inside any residential dwelling, and there is no evidence that noise exposure at this level could cause annoyance. Hence, occurrence of complaints regarding normal substation operations are considered extremely unlikely. As compliance with these limits will be a legal requirement ensured through the substation design process, the noise should only exceed its limits if a fault has developed in one or more items of plant.

Section 6.4 of the Noise Protocol identifies that the first stage in the process would be to undertake a site walkaround to identify any equipment operating incorrectly, within 48 hours of receipt of a complaint. All three substations will be unmanned; hence this timeframe is the minimum that would

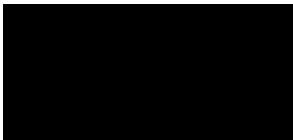
be achievable. It is considered extremely likely that the initial site walkaround would identify any equipment faults, and Section 6.5 of the Noise Protocol states that initial remedial measures must be considered.

Therefore, the likely timeframe for resolution of the issue would depend on how quickly it can be fixed, without the need to resort to the measurement protocol and associated timeframes. The alternative scenario is much less likely, i.e. in the case that the complainant has detected a fault with the plant that the site walkaround could not identify. For the fault to be undetectable by a site operative, it would need to be a very small breach of the consented noise level and therefore unlikely to cause an unreasonable disturbance. This is the only scenario under which the measurement procedures and timeframes described in Section 6.6 of the Noise Protocol [Appendix B.2 of the Interrelationships Report [REP4-296]] are considered likely to apply.

The timeframes identified in Section 6.6 of the Noise Protocol recognise the likely technical complexity of such a scenario and the high degree of individual expertise and equipment precision required to undertake such an investigation. Such resources are of limited availability; hence there can be delays to mobilisation. Following appointment, surveys must only be undertaken when weather conditions are appropriate, so undertaking them at short notice can be challenging in a variable climate such as the UK. The identified timeframes are based on extensive professional experience of how long these activities take; for example, cost-benefit analysis of mitigation options requires information from equipment and mitigation suppliers and the timeframe for providing this is outside of the operator's control. However, these timeframes are the expected maximum and every effort will be made to expedite the process. It may be possible to complete the work quicker than specified when resources are available and weather conditions are appropriate.

Five Estuaries note that there is currently no Institute of Acoustics good practice guide for substations, however comparing the time periods against the [Good Practice Guide](#) for onshore wind turbines¹, the proposed timescales put forward in the proposed timings in the tripartite noise protocol are considerably shorter. For example, the Guidance provides for 21 days for an operator to employ a consultant to investigate a complaint (see example planning condition (c)), but the outline protocol provides 10 working days for the same process. It is therefore not accepted that the drafting or the timescales of the outline protocol are not suitable as has been asserted by the Councils. Rather, Five Estuaries maintains that the outline protocol follows suitable available guidance (there being none specific to co-located substations), and provides shorter timescales for the operators to respond than the timescales set out in that guidance.

Yours faithfully,



Project Lead
Five Estuaries Offshore Wind Farm

¹ A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise