



ESTUARIES

OFFSHORE WIND FARM

FIVE ESTUARIES OFFSHORE WIND FARM

10.19 APPLICANT'S COMMENTS ON DEADLINE 1 SUBMISSIONS

Application Reference:	EN010115
Document Number:	10.19
Revision:	A
Pursuant to:	Deadline 2
Eco-Doc Number:	005416679-01
Date:	22 October 2024



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In preparation of this document Five Estuaries Wind Farm Ltd has made reasonable efforts to ensure that the content is accurate, up to date and complete for purpose.

Revision	Date	Status/Reason for Issue	Originator	Checked	Approved
A	Oct 24	Deadline 1	VEOWF	VEOWF	VEOWF



ACRONYMS

Acronym	Definition
AIL	Abnormal Indivisible Load
CFWG	Commercial Fisheries Working Group
CSIP	Cable Specification and Installation Plan
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
ECC	Export Cable Corridor
EIA	Environmental Impact Assessment
FLCP	Fisheries Liaison Coexistence Plan
HGV	Heavy Goods Vehicle
IPMP	In Principle Monitoring Plan
ISH	Issue Specific Hearing
MCA	Maritime Coastguard Agency
MMO	Marine Management Organisation
OWF	Offshore Wind Farm
PADDS	Principle Area of Disagreement
PLA	Port of London Authority
SRN	Strategic Road Network
VE	Five Estuaries Offshore Wind Farm
WTP	Workforce Travel Plan



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1. INTRODUCTION

- 1.1. As per the Rule 8 Letter [PD-009] published by the Examining Authority on 25 September 2024, comments on any submissions received at Deadline 1 are to be included with submissions for Deadline 2.
- 1.2. This document has been prepared to set out the response of Five Estuaries Offshore Wind Farm Limited ('the Applicant') to submissions made at Deadline 1 with regards to the Five Estuaries Offshore Wind Farm Project ('the Project'), application reference: EN010115.
- 1.3. The Applicant has only responded to points where it believes it would be helpful to the ExA. Rather than copying across whole documents, the Applicant has presented the relevant text or a summary of the points made in the Deadline 1 submissions and then responded to them (while being mindful of the context of those excerpts and being careful not to lose context in summaries).
- 1.4. The absence of commentary on a submission should not be taken as implication that the Applicant supports its content.



2. RESPONSES TO DEADLINE 1 SUBMISSIONS

BABERGH DISTRICT COUNCIL [REP1-061]

Summary of Deadline 1 Submission	Applicant's Response
Babergh District Council provided a summary of their oral submissions from the hearings at Deadline 1.	The Applicant notes it has ongoing engagement with Babergh DC in relation to the concerns raised.

ESSEX COUNTY COUNCIL [REP1-062]

The Applicant notes that Essex County Council has raised a number of points on traffic and transport in its Deadline 1 response. Where the responses are simple clarifications, the Applicant has provided responses in the table below. Where further discussion with Essex County Council or more detailed consideration is required, the Applicant proposes to respond to these points, along with any necessary updates to documents at a later deadline.

Exert from Deadline 1 Submission	Applicant's Response
<p>There are three locations where the highway authority does not agree with the link sensitivity applied by the Applicant:</p> <ul style="list-style-type: none"> > A133 Clacton Road / Main Road (Link 19/20). There are services and facilities along this route, including local shops, a school, employment and a public house in Elmstead Market and Frating. > B1027 St John's Road / Colchester Road (Link 21/22). There are services and facilities along this route, including local shops and a public house in Alresford, and Thorrington Cross for information there is also a 7.5T weight limit due to a weak structure at Alresford viaduct on B1027. > B1035 South (Link 33). There are receptors on this route at Tendring Green and Tendring. 	<p>These highway links could be used by cars and LGVs associated with the construction of VE only i.e. workforce vehicles, not HGVs and therefore would be less sensitive for increases in traffic.</p> <p>The forecast percentage impact on baseline flows on the A133 Clacton Road / Main Road (Link 19/20) is 2.0% and 0.5% on the B1027 St John's Road / Colchester Road (Link 21/22), significantly below the minimum 10% threshold of an increase in total traffic for formal assessment under EIA Regulations and therefore the sensitivity level would not make a difference.</p> <p>Whilst no baseline traffic data was collected on the B1035 in the vicinity of Tendring Green / Tendring, the assessed percentage impact at the B1035 south of the A120 (which</p>



	<p>includes HGVs between The A120 and AC-6 or AC-7), is 5.0%, significantly below the minimum 10% threshold.</p>
<p>The Core HGV delivery profile of traffic across the day is not identified. A flat profile is unlikely to be realistic and so might reduce the impact during any specific hour.</p>	<p>The highest number of two-way (the total of a vehicle arriving and then departing) HGV movements per hour on a link is 18 (Bentley Road), followed by 16 (A133) (with the majority of links under 10 two-way HGVs per hour).</p> <p>In the scenario whereby a greater number of HGVs might occur in one particular hour on Bentley Road and the A133, even if these doubled, the total two-way flow on the majority of links, the number would be much less than 30 two-way movements, used as a threshold for the consideration of undertaking a junction capacity assessment.</p>
<p>No evidence is submitted to support the car share proportion of 1.5 people per car. The Travel Plan does not offer meaningful assurance of the development achieving this level of car sharing through commitments.</p>	<p>The assumption of 1.5 workers per vehicle has been proposed from the start of engagement with Essex County Council (first proposed in the Traffic and Transport: Baseline Summary and EIA Screening Technical Note, November 2022) and the requirement for the justification of it has not been raised in any correspondence from Essex County Council during the Evidence Plan process to-date.</p> <p>The assumption of 1.5 workers per vehicle is considered a reasonable and achievable target (as shown in Table 3.1 in 9.26 Outline Workforce Travel Plan (WTP) [APP-259] for the average car occupancy for the VE construction workforce of those travelling in the highway peak hours (noting the proportion of which is likely to be very low and only during the winter months in the evening peak due to the availability of daylight hours).</p>



	<p>The Department for Transport (DfT)'s most recent policy in Decarbonising Britain: Plan A Better, Greener Britain (2021), is relevant to this approach, which states....</p> <p>“We need to move away from transport planning based on predicting future demand to provide capacity (‘predict and provide’) to planning that sets an outcome communities want to achieve and provides the transport solutions to deliver those outcomes (sometimes referred to as ‘vision and validate’).”</p> <p>Section 5.2 of 9.26 Outline WTP [APP-259] sets out how the anticipated construction vehicle movements assessed in 6.3.8 Traffic and Transport Chapter [APP-090] would be monitored and the mechanism for enforcement should breaches occur. These methods would be set out in greater detail in the final WTP(s).</p> <p>However, the Applicant would welcome further discussion with Essex County Council to update the Outline WTP [APP-259] with further controls, as necessary.</p>
<p>The result of the assessment method above means that a peak of 1,200 workers results in 95 peak hour car movements, which is a significant reduction in impact and does not indicate a robust assessment. There is little in the way of evidence or commitments that give confidence that this is a realistic assessment i.e. no controls on these work hours or car share proportions.</p>	<p>The Applicant would like to clarify that the peak number of workers per day in any month for all onshore works is 600, which equates to 1,200 two-way worker movements per day.</p> <p>The 95 peak hour car movements is calculated from the 1,419 two way worker movements per day, which is the sum of the peak number of workers per day for each onshore route section (and onshore substation), applying 50% for either the arrivals in the morning or departures in the evening, the 1.5 car occupancy target, and the 20% assumed to travel in the peak hour.</p>



	<p>The Applicant notes these comments and welcomes further discussion with Essex County Council to update the Outline CTMP (Revision B) [REP1-043] and the Outline WTP [APP-259] with further controls and monitoring mechanisms, as necessary.</p>
<p>ECC do not agree with the absence of an assessment of the hour of greatest change, as per GEATM guidance. The assessment is based on daily traffic flows; consideration is needed towards assessing the hour of greatest change, which is considered to be a requirement based on the following text, which is taken from paragraph 1.22 of the IEMA guidance ‘Environmental Assessment of Road Traffic and Movement’:</p> <p>“Traffic and movement assessments for EIA and non-statutory environmental assessments, present the impact of traffic and movement on people and the environment – which are initially undertaken with reference to daily traffic flows prior to assessing the time period with the highest potential impact (i.e. degree of change from baseline conditions), which may not be the same as the time period with the highest baseline traffic flows”.</p> <p>The large proportion of traffic impact is likely to be in a short specific time frame (as a result of shift patterns), and only assessing the 12-hour impact dilutes this impact against a greater baseline of traffic</p>	<p>The worst case hour would be between 06:00 and 07:00, whereby a worst case of 100% of workers arrive on site before 07:00. Also, whilst HGV deliveries have been assessed between 07:00 to 19:00, there may be some already on the network before 07:00 and therefore 50% of the hourly HGV movements forecast have could be assumed.</p> <p>With the above VE construction vehicles (at the peak of construction) added to the baseline traffic flows between 06:00 and 07:00, with the exception of Bentley Road, Waterhouse Lane, Little Bromley Road/Ardleigh Road where baseline flows are very low, the total traffic flow would be between 35% and 75% (lower than 50% apart from the B1035 Tendring Road) of the maximum hourly traffic flow during the day on the links on the local road network. Therefore, the forecast hour with likely greatest change in vehicle movements associated with the construction of VE, would not lead to any different conclusions about the significance of impact.</p>
<p>ECC have separately raised a number of points with the Applicant relating to the absence of some information within the submitted material. These include:</p> <ul style="list-style-type: none"> > That Figure (8.12) showing the Peak Hour construction workforce numbers is not included. 	<p>The Applicant has now addressed these inconsistencies in the following documents:</p> <ul style="list-style-type: none"> > 6.3.8 Traffic and Transport chapter - Revision B [REP1-018];



<ul style="list-style-type: none"> > There appears to be an error in the calculations for total vehicle numbers at Table 8.44 for Link 32. > There appears to be an error in the calculations for total vehicle numbers at Table 8.45 for Links 9 and 10. > There appears to be an error in the calculations for total vehicle numbers at Table 8.46 for Links 1, 2, 6, 8, 9, 10, 14 and 15. > The HGV reduction factor applied based on Table 6-1 and Table 62 of the Traffic and Transport Baseline Report – Part 1 [APP-172] > Some inconsistencies with Appendix U Traffic and transport Baseline Report – Part 2 [APP-173]. > The Council could not identify that General Arrangement drawings for all the accesses and haul road crossings have been included. <p>ECC have raised the potential errors with the Applicant, who we understand has addressed verbally and is looking to submit an updated chapter to address. The Applicant has separately supplied the Council with materials showing these issues being addressed</p>	<ul style="list-style-type: none"> > 6.6.8.1 Traffic and Transport Baseline Report - Part 1 - Revision B [REP1-026]; and > 6.6.8.2 Traffic and Transport Baseline Report - Parts 2 to 6 - Revision B [REP1-027 to REP1-032].
<p>AILs</p> <p>There is no reference to cable drum AILs within the Traffic and Transport chapter [APP-090], but it became clear at ISH1 that there is a requirement for these to access the proposed accesses on the rural road network. There are concerns around the routes for AILs for these cable drums associated with all of the accesses on the route, particularly the number and frequency. Clarity is sought on what assessment has been undertaken of the routes, including whether a structural assessment has been undertaken to ensure the deliverability of their routes i.e. can the local road</p>	<p>The Applicant has prepared an Abnormal Indivisible Load (AIL) Technical Note, which is being submitted at Deadline 2. This includes swept path analyses of the largest likely cable drum delivery vehicle on the highway network.</p> <p>There would be an estimate of 280 to 290 cable drum vehicle movements, which are included in the forecast construction vehicle movements set out in the Traffic and Transport chapter [REP1-018].</p>



network accommodate these movements. If an assessment has not been undertaken of the routes, it may be that they are not deliverable, and so would have to use alternative routes with different impacts. This presents a risk to the project. We would request that swept path drawings are provided at key junctions along these routes, and structures pinpointed along the designated routes with assessments undertaken of those structures.

At page 24 of Chapter 8: Traffic and Transport [APP-090] the Applicant sets out that the preferred base port for the offshore construction, operation and maintenance activities is not known and would be decided post consent, and importantly that port activity would be within the envelope assessed when the existing approvals for the port were considered. However, there is currently not any evidence submitted that supports this position. An Outline Port Construction Management Plan [REP11-024] was submitted as part of the East Anglia One North Development Consent Order. This included a commitment to review the localised impacts of the port traffic, as well as site specific travel planning at that time. A commitment towards a similar approach here appears to be sensible.

This was addressed by the Applicant under Agenda item 3.7 of ISH1 and in [REP1-059]. With reference to the East Anglia One North DCO mentioned by ECC, it is not clear to the Applicant why a management plan would be required. These documents are forms of mitigation, however the Applicant is not proposing any development at a port, and therefore has not assessed impacts and accordingly has no need for mitigation. The same would apply to any other ancillary facility, factory or other location (e.g. a waste disposal site) where vehicles that may support the project would use, but which would be managed under consents and any required traffic management plans associated with those sites. Such sites, including any port, will have assessed traffic impacts associated with the use of their facility as part of their consent, and there is no reason why project-related traffic should be considered any differently or cumulatively to any other user of an existing port.



HARWICH HARBOUR FISHERMENS ASSOCIATION [REP1-063]

Summary from Deadline 1 Submission	Applicant's Response
<p>Positive discussions between the Applicant and local fisheries have been held via the working group, but concerns about impacts of the project on commercial fishing remain (see rows below).</p>	<p>The Applicant has held several Commercial Fisheries Working Group (CFWG) meetings with the local fishermen's associations since the Pre-Application phase and will maintain this dialogue throughout the lifetime of the project. To date engagement has been positive and constructive, and the Applicant welcomes further feedback from Harwich Harbour Fishermen's Association.</p> <p>The concerns of the CFWG have been recorded and considered in undertaking the commercial fisheries impact assessment for Five Estuaries, and in developing the outline Fisheries Liaison and Co-existence Plan (FLCP) Revision B [REP1-035].</p> <p>The Applicant notes that a number of concerns expressed in the Harwich Harbour Fishermen's Association response reflect experiences resulting from other offshore projects. The Applicant has been and remains keen to learn from these experiences, noting that Five Estuaries is committed to a number of project-specific measures to manage potential impacts on commercial fisheries.</p>



MARINE MANAGEMENT ORGANISATION [REP1-064]

Summary of Deadline 1 Submission	Applicant's Response
<p>The MMO raised a number of detailed points in their Deadline 1 submission</p>	<p>These are under consideration by the Applicant. Revisions to the 3.1 Draft Development Consent Order [REP1-008] made at Deadline 1, address some of these points. The Applicant has sent a draft Statement of Common Ground to the Marine Management Organisation and is continuing to engage with them. The Applicant will respond in more detail at Deadline 2.</p>

MARITIME AND COASTGUARD AGENCY [REP1-065]

Exert from Deadline 1 Submission	Applicant's Response
<p>The Marine Coastguard Agency (MCA) have submitted their Written Representation at Deadline 1. Their response covers the following points:</p> <ul style="list-style-type: none"> > Navigable sea room > Shipping and navigation mitigation measures > Layout design > Marking and lighting > Emergency response and search and rescue > Construction scenarios > Cable routes and cable protection > Safety zones > Comments on the draft Development Consent Order (DCO) 	<p>The Applicant acknowledges, and welcomes the Written Representations submitted by the MCA. The Applicant notes that the Deadline for further Written Representations from IPs is Deadline 2, and therefore will respond to all submitted Written Representations collectively at Deadline 3.</p>



NATIONAL HIGHWAYS [REP1-066]

Summary of Deadline 1 Submission	Applicant's Response
<p>National Highways submitted a summary of their position at Deadline 1. The principal concerns to National Highways relate to impacts on the SRN during construction and can be summarised as follows:</p> <ol style="list-style-type: none">1. Traffic modelling queries.2. Demonstration of the adequacy of mitigation works proposed at the junction of the A120 and Bentley Road.3. Outstanding risks associated with the Abnormal Indivisible Loads proposals.4. Protective Provisions	<p>The Applicant acknowledges, and welcomes the submission from National Highways. There are ongoing discussions between the Applicant and National Highways to seek to find an agreed position on the items raised.</p>



NATURAL ENGLAND [REP1-067]

Exert from Deadline 1 Submission	Applicant's Response
<p>Natural England's Deadline 1 Submissions Natural England has reviewed the documents submitted by the Applicant at Deadline 1. An update of Natural England's position regarding documents relevant to our remit is provided in Annex 1, including anticipated timing of responses. Natural England is also submitting the following detailed responses, signposted from Annex 1: EN010115 486669 Five Estuaries Appendix L – Natural England's Risk and Issues Log</p>	<p>The Applicant welcomes Natural England's update on their position to recent submissions.</p>
<p>Relevant and Written Representations In the interests of issue resolution Natural England combine our Relevant Representations and Written Representations which were submitted on 21 June 2024 (then formatted and re-submitted on 13 August 2024, as requested by the Examining Authority). This combined approach aims to provide the detail on all issues as early as possible to allow more time for discussion and resolution. As advised in the cover letter of our Relevant Representations, Natural England will, if required and appropriate, develop these points through further Written Representations or in response to Examiner's questions.</p>	<p>This is noted, and the Applicant's response to Natural England's combined relevant and written representations can be found at 10.4.1 Applicant's response to Natural England's Relevant Representations [REP1-051].</p>
<p>Risk and Issues Log Natural England has submitted a Risk and Issues Log, password protected in Excel format to allow ease of use. We highlight within the Log where assessments can be improved upon, and commitments made by the Applicant to help inform the ExA and SoS in their determinations. It is anticipated that the Risk and Issues Log will be updated and submitted alongside our submissions during Examination at each deadline to reflect any progress in issue resolution during examination.</p>	<p>The Applicant notes that Natural England has submitted a risk and issues log. The Applicant will primarily use the PADDs as the tool to reflect agreements (where possible) on key topics with Natural England.</p>



<p>Natural England wishes to highlight that the focus of our engagement during Examination will be on reviewing relevant updated documents/outline plans or thematic clarification notes submitted by the Applicant only. We will not be responding to commentary on our representations, other interested parties' representations or to comments from the Applicants or other stakeholders on the Risk and Issues Log, unless the ExA questions direct us to do so. The Risk and Issues Log will be used to track issue progress, and we will signpost to our advice where applicable. Likewise, if the Applicant wishes to provide a signposting document that directs us and the ExA to where they address our concerns in the various plans/docs/assessments, then that would be most welcomed.</p>	
<p>Principal Areas of Disagreement Summary Statement (PADSS) Natural England will provide updates to our PADSS from Deadline 2 onwards, this will address the request, by the Examining Authority, in their Procedural Decision letter (dated 23 July 2024). This will be captured within our Risk and Issues Log. Thereafter, we will work on the basis that the PADSS will be updated at each subsequent Examination deadline. We hope this will be of assistance to the ExA in understanding Natural England's current outstanding issues and on demonstrating progress on issue resolution.</p>	<p>The Applicant notes that Natural England will update their PADSS from Deadline 2 onwards. The Applicant will respond to any updates to the PADSS at subsequent Deadlines.</p>
<p>Issue Specific Hearings (ISHs) As set out in Natural England's Rule 6 response letter (23 August 2024), we will only attend hearings by exception, targeting those ISHs that have the greatest likelihood of resolving significant environmental risks. In such instances our attendance will be virtual. Our non-attendance at hearings should not be construed as a lack of concern on outstanding issues, or a lack of</p>	<p>This is noted by the Applicant and welcome further engagement with Natural England.</p>



<p>willingness to engage. As detailed above we are committed to proactively engaging with parties on this project and to gaining the best possible outcome. Natural England would be pleased to respond to any questions from the ExA that arise from the hearings at a subsequent deadline.</p> <p>Natural England’s advice for all hearings is that we request a detailed agenda be provided by the Planning Inspectorate at least 7 days in advance, with timing, themes, and specific aspects of those themes for discussion. Based on our experience from other NSIPs, it would be helpful to Natural England and our specialists if the ISH agendas could be focused on specific questions from the ExA.</p>	
<p>In-Principle Monitoring Plan (IPMP) Natural England will review the IPMP at Deadline 2, by which time we hope to have received further information from the Applicant on their proposed monitoring.</p>	<p>The Applicant welcome further comments from Natural England at Deadline 2 on the updated 9.32 Offshore In Principle Monitoring Plan – Revision B (Clean) [REP1045].</p>

PORT OF LONDON AUTHORITY [REP1-069]

Summary of Deadline 1 Submission	Applicant’s Response
<p>The use of Deep Water Routes and the need for cables to be buried sufficiently to allow the ongoing and future operation of these routes.</p>	<p>The Applicant held meetings with PLA, London Gateway and Port of Tilbury on 4th October and 21st October on this matter. It is accepted that deeper cable burial, at least 22m below chart datum (CD) will be required over the Deep Water Routes. Positive progress has been made in defining the area over which this commitment is required, and the Applicant continues to work with the PLA and other stakeholders to agree this. It is expected that agreement will be possible by the close of examination.</p>



<p>Temporary impacts due to construction vessels and concurrent working with other projects.</p>	<p>The Outline Navigation and Installation Plan (NIP) – Revision B [REP1-040] submitted at Deadline 1 provides further details on concurrent working, with areas defined where this will be avoided for certain activities. The Applicant notes that the NIP only covers vessels under the Applicant’s control, and that the similar commitments should be requested by the PLA for potentially overlapping projects, to ensure the potential for impacts from concurrent working are minimised. The Outline NIP sets out the details that will be provided to the various interested parties (including the PLA) but these can only be provided closer to the time, once contracts are placed and vessels secured. The Outline NIP therefore secures the level of information that will be provided and sets out the communication and planning required to minimise impacts. The NIP is intended to be a live document, updated as construction progresses, nonetheless the need to seek agreement from the interested parties has been included on the request of the PLA and other stakeholders, whilst approval can only be granted by the MMO as regulator.</p> <p>An updated version (Revision C) has been provided to IPs including the PLA, and is under discussion between the parties.</p>
<p>Impacts from the location of Offshore Substation Platforms</p>	<p>The Applicant has addressed this concern through an update to the Works Plan - Offshore [REP1-006] submitted at Deadline 1.</p>
<p>Concerns regarding the ability to dispose of sediment in the Deep Water Routes</p>	<p>The Applicant recognises this concern and commits to not disposing of sediment in the Deep Water Routes. The method of securing this commitment is currently being worked on, and may be provided in an update version of the Outline CSIP or in a separate sediment disposal plan.</p>



<p>Protective Provisions for onshore assets and offshore navigation</p>	<p>As noted in the PLA's Deadline 1 submission, the Applicant is in discussion with the PLA on protective provisions. Those for the onshore assets are understood to be well advanced, whilst negotiation is continuing on the scope of the offshore provisions. It should be noted that it is agreed in principle the offshore protective provisions for the benefit of the PLA will replace those for the benefit of London Gateway in a future submission of the dDCO.</p>
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ROYAL SOCIETY FOR THE PROTECTION OF BIRDS (RSPB) [REP1-070]

Exert from Deadline 1 Submission	Applicant's Response
<p>The Royal Society for the Protection of Birds (RSPB) submitted a summary of their Relevant Representations.</p>	<p>The Applicant notes that this is a summary of the RSPBs relevant representations response. The Applicant has responded to the RSPBs full relevant representations at Deadline 1 and can be found in 10.4 Applicant's Response to Relevant Representations (Clean) [REP1-049].</p>

SUFFOLK COUNTY COUNCIL [REP1-071]

Exert from Deadline 1 Submission	Applicant's Response
<p>In terms of the suggested transport routes for heavy goods vehicles (HGVs), there is the inclusion of a corridor of part of the A12, but only up to as far as Junction 29 (the Ardleigh Crown Interchange). There does not appear to have been any assessment of traffic movements outside this Study Area or this one HGV route. SCC is, therefore, concerned that there has not been clear enough explanation as to why there will not be some traffic impacts, particularly in terms of construction, on the Suffolk road network</p>	<p>The Applicant has updated Table 8.17 in 6.3.8 Traffic and Transport chapter - Revision B [REP1-018] to show the split of the distributed workforce vehicles from the A12 North that are forecast to arrive from / depart to the A12/ A14 Copdock Roundabout for those living in Ipswich (4.4%, which equates to 8 in the peak hour for Five Estuaries (VE) or 10 for VE and North Falls Offshore Wind Farm (NF OWF)). This is based on the agreed distribution with Essex County Council and National Highways.</p>



	<p>The remaining 14.4% of workforce vehicles originating from the A12 North are assumed to originate from Babergh District (6.0%) Mid-Suffolk District (1.0%), Suffolk Coastal (1.4%) which would be dissipated on the local road network within Suffolk.</p> <p>The remaining 6% is attributed to other locations other further than Ipswich; however, as workers are unlikely to travel greater than 45 minutes, it is assumed this proportion of workers would arrive from the locations listed above which would be dissipated on the local road network within Suffolk.</p> <p>HGVs would originate from the A14 west or east, which is the strategic road network (SRN). Some may originate from the A12 north, which is in the jurisdiction of Suffolk County Council; however, it is likely these would be limited and have no material impact.</p> <p>Given the above, it is not expected there would be any significant traffic and transport effects on the local road network in Suffolk.</p>
<p>SCC welcomes the reference to the use of Harwich and the A120 for the corridor to achieve AILs for the substation sites. If this were to be secured, there would be no AIL implications for Suffolk. However, although this corridor is referred to in the Outline Construction Traffic Management Plan, this document also states that other options may be considered at the detailed design stage, post-consent [Paragraph 4.1.15, APP-257]. From SCC's perspective, this is not satisfactory as it leaves open the possibility of the use of other corridors.</p>	<p>9.24 Outline Construction Traffic Management Plan [APP-257], which has been superseded by Revision B [REP1-043] states at Paragraph 4.1.15:</p> <p>“Whilst the above proposal has been agreed in principle by NH, additional options may be considered during the detailed design stage, should the DCO be approved.”</p> <p>This is in relation to the method of the Abnormal Indivisible Load (AIL) manoeuvre between the A120 and Bentley Road and not the consideration of another port.</p>
<p>As the location of the chosen port is unknown, SCC considers there to be the need for an Outline Port Construction</p>	<p>This was addressed by the Applicant under Agenda item 3.7 of ISH1 and in [REP1-059]. With reference to the other DCOs</p>



Management Plan. SCC notes that the development consent orders (DCOs) made in 2022 for East Anglia ONE North (EA1N) and East Anglia TWO (EA2) both contained requirements for an outline port construction management plan to manage port traffic associated with the construction of the relevant windfarms, and SCC would be looking for the same in relation to this proposal.

mentioned by SCC, it is not clear to the Applicant why a management plan would be required. These documents are forms of mitigation, however the Applicant is not proposing any development at a port, and therefore has not assessed impacts and accordingly has no need for mitigation. The same would apply to any other ancillary facility, factory or other location (e.g. a waste disposal site) where vehicles that may support the project would use, but which would be managed under consents and any required traffic management plans associated with those sites. Such sites, including any port, will have assessed traffic impacts associated with the use of their facility as part of their consent, and there is no reason why project-related traffic should be considered any differently or cumulatively to any other user of an existing port.

The logo for Five Estuaries features the word 'FIVE' in a large, sans-serif font. The letter 'I' is grey, 'V' is purple, and 'E' is pink. To the right of 'FIVE' are three wavy lines representing water, colored blue, green, and yellow from top to bottom. Below 'FIVE' is the word 'ESTUARIES' in a large, grey, sans-serif font, and below that is 'OFFSHORE WIND FARM' in a smaller, grey, sans-serif font.

FIVE
ESTUARIES
OFFSHORE WIND FARM

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