



## Application by Five Estuaries Offshore Wind Farm Limited for the Five Estuaries Wind Farm

### The Examining Authority's written questions and requests for information

Issued on 8 November 2024

The following table sets out the Examining Authority's (ExA's) questions and requests for information and constitutes the ExA's second Written Questions (ExQ2).

**Responses to the questions and requests for information included in ExQ2 must be submitted at Deadline 4 (3 December 2024)**, in line with the Examination Timetable included in Annex A of the ExA's Rule 8 letter issued on 25 September 2024 [[PD-009](#)]. If necessary, the Examination Timetable enables the ExA to issue further rounds of written questions in due course.

Questions are set out using an issues-based framework derived from the Initial Assessment of Principal Issues provided as Annex C to the Rule 6 letter of 20 August 2024 [[PD-007](#)]. Questions have been added to the issue-based framework as they have arisen from representations and to address the assessment of the Application against relevant legislative provisions and policies.

Column 2 of the table indicates which Interested Parties (IPs) and other persons each question is directed to. The ExA would be grateful if all persons named could answer all questions directed to them, providing a substantive response, or indicating that the question is not relevant to them for a reason. This does not prevent an answer being provided to a question by a person to whom it is not directed, should the question be relevant to their interests.

Each question has a unique topic prefix identifier (capital letters), a reference number which starts with 2 (indicating that it is from the second round of written questions) and then a question number. For example, the first question on Navigation and Shipping issues is identified as NS.2.01. When you are answering a question, please start your answer by quoting the unique reference number.

An editable version of this table in Microsoft Word is available on request from the case team: please contact [fiveestuaries@planninginspectorate.gov.uk](mailto:fiveestuaries@planninginspectorate.gov.uk) and include Five Estuaries Wind Farm in the subject line of your email.



## Abbreviations used:

<b>AEoI</b>	Adverse Effect on the Integrity of the Site
<b>ANS</b>	Artificial Nesting Structure
<b>BMV</b>	Best and most versatile agricultural land
<b>CA</b>	Compulsory Acquisition
<b>CBRA</b>	Cable Burial Risk Assessment
<b>CEMP</b>	Construction Environmental Management Plan
<b>CoCP</b>	Code of Construction Practice
<b>dDCO</b>	Draft Development Consent Order
<b>DML</b>	Deemed Marine Licence
<b>Defra</b>	Department for Environment, Food and Rural Affairs
<b>DWR</b>	Deep Water Routes
<b>EACN</b>	Proposed National Grid East Anglia Connection Node
<b>EIA</b>	Environmental Impact Assessment
<b>EM</b>	Explanatory Memorandum
<b>ES</b>	Environmental Statement
<b>ECC</b>	Export Cable Corridor
<b>ExA</b>	Examining Authority
<b>FLCP</b>	Fisheries Liaison and Co-existence Plan
<b>FFC SPA</b>	Flamborough and Filey Coast Special Protection Area
<b>FRA</b>	Flood Risk Assessment
<b>GW</b>	Gigawatt



<b>HE</b>	Historic England
<b>HoTs</b>	Heads of Terms
<b>HRA</b>	Habitats Regulations Assessment
<b>IP</b>	Interested Party
<b>ISH</b>	Issue Specific Hearing
<b>LBBG</b>	Lesser Black Backed Gull
<b>LIR</b>	Local Impact Report
<b>LPA</b>	Local Planning Authority
<b>MCA</b>	Maritime and Coastguard Agency
<b>MDS</b>	Maximum Design Scenario
<b>MLS SAC</b>	Margate and Long Sands Special Area of Conservation
<b>MMO</b>	Marine Management Organisation
<b>MRF</b>	Marine Recovery Fund
<b>NE</b>	Natural England
<b>NERC</b>	Natural Environment Research Council
<b>NFOWFL</b>	North Falls Offshore Wind Farm Limited
<b>NGET</b>	National Grid Electricity Transmission Plc
<b>NH</b>	National Highways
<b>NSIP</b>	Nationally Significant Infrastructure Project
<b>OLEMP</b>	Outline Landscape and Ecological Management Plan
<b>OnSS</b>	Onshore substation
<b>OSP</b>	Offshore Substation Platform



<b>OWF</b>	Offshore wind farm
<b>PA2008</b>	The Planning Act 2008
<b>Proposed Development</b>	The proposed Five Estuaries Offshore Wind Farm
<b>RIAA</b>	Report to Inform Appropriate Assessment
<b>RR</b>	Relevant Representation
<b>RSPB</b>	Royal Society for the Protection of Birds
<b>SAC</b>	Special Area of Conservation
<b>SF6</b>	Sulphur Hexafluoride
<b>SoCG</b>	Statement of Common Ground
<b>SoR</b>	Statement of Reasons
<b>SoS</b>	Secretary of State
<b>SPA</b>	Special Protection Area
<b>SRN</b>	Strategic Road Network
<b>WR</b>	Written Representation
<b>WTG</b>	Wind Turbine Generator

## The Examination Library

References in these questions set out in square brackets (eg [APP-001, PD-001 etc]) are to documents catalogued in the Examination Library. The Examination Library can be obtained from the following link: [EN010115-000464-Five Estuaries OWF Exam Library.pdf](https://www.planninginspectorate.gov.uk/examination-library/EN010115-000464-Five-Estuaries-OWF-Exam-Library.pdf) ([planninginspectorate.gov.uk](https://www.planninginspectorate.gov.uk)). It will be updated as the Examination progresses.



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ExQ2 Responses by Deadline 4 (3 December 2024)

	Question to:	Question
<b>General and Cross-topic questions (GC)</b>		
GC.2.01	Applicant	<p><b>STATCOMS</b></p> <p>Reference to STATCOMs has been made in section 4.5 of the Technical Note for Onshore Civils and Electrical [REP2-030]. The abbreviation/acronym STATCOMs has not been defined in the Technical Note, what are they?</p>
GC.2.02	Applicant and National Grid Electricity Transmission (NGET)	<p><b>The role of the proposed East Anglia Connection Node (EACN) substation</b></p> <p>In paragraph 4.6.2 of the Applicant’s Technical Note for Onshore Civils and Electrical [REP2-030] it is stated that the EACN substation would not “... <i>solely serve the windfarms but is part of a wider project</i>”. What other projects would the EACN substation serve?</p>
GC.2.03	NGET	<p><b>Need for the EACN substation</b></p> <p>If both the Five Estuaries and North Falls projects were to be consented by the Secretary of State but for whatever reason neither were subsequently to proceed to implementation, would there be a need for the proposed EACN substation?</p>
GC.2.04	Essex County Council	<p><b>Landscape mitigation and habitat creation</b> (cross-cutting relating to Ecology, Farming and Visual Impact)</p> <p>In the Outline Landscape and Ecological Management Plan (OLEMP) [REP2-022] the plan for the onshore substation zone shows an area to the north and east of the proposed substations as a traditional orchard and meadows.</p> <p>At Issue Specific Hearing 3 you commented “<i>copses and small woodlands, which are more typical of the Tendring landscape</i>” and “<i>that using it for meadowlands ... for ecological mitigation/enhancement was not the best use of it</i>’.</p> <p>Elaborate on why you consider the planting proposals for the substation zone would not be appropriate.</p>

ExQ2 Responses by Deadline 4 (3 December 2024)

	Question to:	Question
GC.2.05	East Anglia Two Limited	<p><b>Wake Loss</b></p> <p>In your Deadline 2 written submission [REP2-079] you contend “... <i>The turbines associated with the current application will inevitably cause wake loss in the context of the East Anglia Two project arrays. Given the proximity, it is likely that the losses will be material</i>”.</p> <p>a) What evidence do you have to support the contention that the siting of the wind turbine generators forming part of the Proposed Development would interfere with the operation of the East Anglia Two Offshore Wind Farm?</p> <p>b) How much of East Anglia Two’s generating capacity do you consider would be impaired because of the proximity of the Proposed Development’s wind turbine generators?</p>
<b>Climate Change (CC)</b>		
CC.2.01	Applicant	<p><b>Nature of gas that might be used if the proposed onshore substation was to be gas insulated</b></p> <p>Clarify whether Sulphur Hexafluoride (SF6) would or would not be used if the proposed onshore substation was to be gas insulated. Should the applicant intend to use SF6, explain, as required by paragraphs 2.9.62 to 2.9.64 of National Policy Statement EN-5:</p> <p>a) why the use of SF6 could not be avoided, including giving details of the alternatives that have been considered and why those alternatives are technically infeasible or would require bespoke components that are grossly disproportionate in terms of cost; and</p> <p>b) the plan for the monitoring and control of fugitive SF6 emissions consistent with the Fluorinated Gas Regulation and its successors.</p>
CC.2.02	Applicant	<p><b>Carbon Emissions Assessment</b></p> <p>a) Advise as to whether the recent High Court judgement for Friends of the Earth Limited and South Lakeland Action on Climate Change versus Secretary of State Levelling Up Housing and Communities [2024] EWHC 2349 (Admin) has any implications for the assessment of carbon emissions undertaken in Climate Change section of the Environmental Statement (ES) [APP-093]. Most particularly, is any further analysis of carbon emissions downstream of the project necessary?</p>

ExQ2 Responses by Deadline 4 (3 December 2024)

	Question to:	Question
		b) Would consideration need to be given to other electricity generating sources producing direct carbon emissions when the Proposed Development following commissioning was not able to generate any electricity or was generating at reduced level of output?
CC.2.03	Applicant	<p><b>Waste Management</b></p> <p>Essex County Council and Tendring District Council in section 10.9 (Shoreline Management Plan) of their Local Impact Report (LIR) [REP2-043] make reference to the Hydrology, Hydrogeology and Flood Risk section of the ES [APP-088] in relation to the Essex and South Suffolk Shoreline Management Plan (SMP) and matters relating to the “Hold the Line” policy for the period up to 2055. The Councils consider that there is an opportunity to utilise the <i>‘material generated by horizontal drilling or other trenched excavations’ ‘for coastal protection or habitat creation in Essex’</i>.</p> <p>Has any engagement with stakeholders been undertaken in respect of utilising waste soils/sub-soils for the management of coastal change?</p>
<b>Draft Development Consent Order (dDCO)</b>		
<b>Note All references to the numbering of Articles and Schedules (including Requirements) refer to those used in the version of the dDCO submitted at Deadline 1 [REP1-008]</b>		
DCO.2.01	Applicant	<p><b>DCOs cited as precedents for the purposes of drafting the dDCO</b></p> <p>Paragraphs 4.3 and 4.4 of the Explanatory Memorandum [REP1-010] cite the following made DCOs as precedents for the purposes of drafting the dDCO:</p> <ul style="list-style-type: none"> <li>a) Awel y Môr Offshore Wind Farm Order 2023</li> <li>b) Hornsea Four Offshore Wind Farm Order 2023</li> <li>c) East Anglia ONE North Offshore Wind Farm Order 2022</li> <li>d) Hornsea Three Offshore Wind Farm Order 2020</li> <li>e) Norfolk Vanguard Offshore Wind Farm Order 2022</li> <li>f) Norfolk Boreas Offshore Wind Farm Order 2021</li> <li>g) Sheringham Shoal and Dudgeon Extensions Offshore Wind Farm Order 2024</li> </ul>



ExQ2 Responses by Deadline 4 (3 December 2024)

	Question to:	Question
		The Applicant is requested to submit copies of the above listed made DCOs so that they can be added to the Examination Library and referred to by the ExA as may be necessary.
DCO.2.02	Applicant	<p><b>Potential requirement defining width parameters for an onshore cable corridor for the proposed Five Estuaries Offshore Wind Farm alone and for the proposed Five Estuaries Offshore Wind Farm in combination with the proposed North Falls Offshore Wind Farm</b></p> <p>Further to the discussions held during Compulsory Acquisition Hearings (CAH) 1 and 2 concerning the Compulsory Acquisition powers being sought to provide an onshore cable corridor for both the proposed Five Estuaries and North Falls Offshore Wind Farms and the information about cable corridor widths included in the Applicant's post CAH1 <i>Technical Note: Onshore Civils and Electrical</i> [REP2-030], the Applicant is requested to, on a without prejudice basis, submit wording for a potential requirement defining width parameters for an onshore cable corridor of sufficient width for the proposed Five Estuaries Offshore Wind Farm alone.</p>
DCO.2.03	Applicant Marine Management Organisation (MMO)	<p><b>Article 7 (Benefit of the DCO)</b></p> <p>a) <b>For the MMO</b> - identify any concerns you continue to have with respect to the drafting of Article 7 (Benefit of the Order). How do you consider those concerns would affect the MMO's ability to undertake its duties pursuant to Article 5 (Deemed marine licences under the 2009 Act) and Schedules 10 and 11 (the Deemed Marine Licences) included in the dDCO and explain how those concerns might be addressed?</p> <p>b) <b>For the Applicant</b> - explain why you consider the MMO's position is incorrect with respect to the operation of Article 7 and the DMLs and signpost any support for your position that might be found in the made DCOs to be submitted in response to ExQ 2 DCO.2.01?</p>
DCO.2.04	Tendring District Council	<p><b>Requirement 5 (Onshore substation works)</b></p> <p>Putting aside some 'legacy' drafting issues in the version of the dDCO submitted at Deadline 1 [REP1-008] following the merging of former Requirement 6 (Landscaping) with Requirement 5, which the Applicant has submitted it will be addressing when the next version of the draft DCO is submitted, do you consider Requirement 5 would provide an appropriate mechanism for determining the detailed design for the proposed onshore substation? If you consider that Requirement 5 is deficient in any way, explain why that is the case.</p>

## ExQ2 Responses by Deadline 4 (3 December 2024)

	<b>Question to:</b>	<b>Question</b>
DCO.2.05	Tendring District Council and East Suffolk Council	<p><b>Drafting of the proposed Articles and Schedules 1 and 2</b></p> <p>Do you have any concerns about the drafting of any aspects of the Articles and/or Schedules 1 and 2 in the dDCO? If you have any such concerns submit wording that you consider would address those concerns.</p>
DCO.2.06	Applicant	<p><b>Wording of the Force majeure conditions in Schedules 10 and 11</b></p> <p>Further to the Applicant's response to ExQ DCO.1.25, apart from adverse weather conditions, what other circumstances might cause the master of a vessel to deposit authorised deposits within or outside the Order Limits.</p>
DCO.2.07	Applicant and MMO	<p><b>Deemed Marine Licences (DML) Schedules 10 and 11</b></p> <p>A Site Integrity Plan does not form a standalone condition within the DMLs. On a without prejudice basis, submit wording that would secure the inclusion of a Site Integrity Plan within the DMLs.</p>
DCO.2.08	Applicant	<p><b>Condition 6(16) (Notifications and inspections) of Part 2 of Schedule 10 (Deemed marine licence – Generation Assets)</b></p> <p>What type of materially false or misleading information is being referred to in subparagraph (16) of condition of the DML for the generation assets?</p>
<b>Historic Environment including Marine Archaeology (HE)</b>		
No Questions at this time		

ExQ2 Responses by Deadline 4 (3 December 2024)

	Question to:	Question
<b>Land Rights (Compulsory Acquisition (CA) and Temporary Possession (TP) etc) (LR)</b>		
LR.2.01	National Highways	<p><b>Directional drilling and cable pulling activities under the A120</b></p> <p>During ISH4 the Applicant responded to a question from the ExA regarding NH's concerns in its Deadline 1 submission (section 6.1 in [REP1-066]) in respect of the Compulsory Acquisition powers sought with respect to the proposed trenchless cable crossing underneath the A120. The Applicant indicated that it had discussed the matter with NH and the plot in question was included in the Book of Reference (BoR) [REP1-012].</p> <p>a) Are you satisfied that the crossing point under the A120 has been included in the BoR?  b) Do you expect to reach an agreement with the Applicant in relation to land rights for the crossing point under the A120 by the close of the Examination?</p>
<b>Marine Ecology (ME)</b>		
<b>Benthic Ecology</b>		
ME.2.01	Applicant	<p><b>Without prejudice derogation case – Margate and Long Sands Special Area of Conservation (MLS SAC)</b></p> <p>A without prejudice derogation case [AS-003] has been submitted in respect of MLS SAC, with the preferred compensation measure being strategic compensation in the form of a new site designation or extension for Annex I sandbanks.</p> <p>Can any update be provided on the Defra-led strategic benthic compensation programme under which compensation for the MLS SAC would be delivered, including the expected timing of any guidance or statements? Can the Applicant also comment on what level of confidence the ExA can place on the delivery of this compensatory measure.</p>
ME.2.02	Natural England	<p><b>Technical Note – Methodology for Determining Maximum Design Scenario</b></p> <p>The Applicant has provided a Technical Note – Methodology for Determining Maximum Design Scenario (Offshore) [REP2-027]. Is Natural England content with what is stated in that technical note? If not, by Examination Deadline 4 identify any outstanding concerns and explain why you have those concerns.</p>

ExQ2 Responses by Deadline 4 (3 December 2024)

	Question to:	Question
ME.2.03	Natural England	<p><b>Margate and Long Sands Special Area of Conservation – conservation advice</b></p> <p>At E26 in [PD2-007] you have advised that the conservation advice package for MLS SAC was due to be updated as draft in autumn 2024. Can you provide an update on timescales for this forthcoming advice. Is there any relevant interim advice in its absence?</p>
ME.2.04	Natural England	<p><b>Seagrass habitat creation/restoration compensatory measure</b></p> <p>At F32 in [PD2-008] you have stated that you would submit further comment on the technical feasibility of the proposed seagrass habitat creation/restoration compensatory measure included within the Applicant’s without prejudice derogations case at Deadline 1. This does not appear to have been provided to date. Natural England should therefore submit this information by Deadline 4.</p>
ME.2.05	Applicant	<p><b>Technical Note - Methodology for Determining MDS (Offshore)</b></p> <p>The Applicant is requested to submit an updated version of its Technical Note - Methodology for Determining MDS (Offshore) [REP2-027] by Deadline 4. This must address the following:</p> <ul style="list-style-type: none"> <li>a) Paragraph 1.1.12 states that some information is not provided as the Applicant considers it to be confidential or propriety information that is sensitive. The ExA requests confirmation as to whether this information could be submitted on a confidential basis or in part. If not, the Applicant is requested to explain the level of confidence the ExA can have in the MDS used in the absence of full information.</li> <li>b) Paragraph 2.1.3 restates that the maximum number of cable crossings has been set at 56. The Applicant must present a detailed explanation of how this parameter has been established, including any assumptions made.</li> <li>c) Paragraph 2.2.2 refers to the potential for a very small volume of sediment being trapped within rock voids and/or accumulating on the updrift side of berms of the cable protection, if required. The Applicant is requested to quantify the volume or provide an estimate of the maximum expected volume of such sediment.</li> <li>d) Paragraph 2.2.4 states that monitoring and observation of operational offshore wind farms shows that large scale morphological features are not affected by the presence of assets (cable protection) and that scour impacts would be very small. The Applicant is requested to</li> </ul>

ExQ2 Responses by Deadline 4 (3 December 2024)

	Question to:	Question
		<p>submit evidence in support of this assertion and to clarify the predicted maximum distance of impacts based on this evidence.</p> <p>e) Paragraph 2.4.2 states that a 50% assumption has been applied to sediment disturbed from fluidised material dispersed during cable trenching. This information seems to contradict the Applicant's response at Deadline 1 [REP1-051] that an assumption of 100% of material is fluidised and displaced. The Applicant is requested to clarify what has been considered in the assessment. The ExA notes that Table 2.8 in [APP-071] states that a sensitivity check on 100% of material ejected in local areas was undertaken. The Applicant is requested to confirm where this is presented in the Application documentation.</p> <p>f) A full response to the matters raised by Natural England in items B13 [PD2-004] and E6 and E7 in [PD2-006] should be provided in terms of how seabed disturbance from operational cable repairs and replacement has been calculated drawing on experience (including analysis from operational offshore wind farms) and ground type information.</p>
ME.2.06	Applicant	<p><b>Adverse Effect on the Integrity of the MLS SAC</b></p> <p>Can any examples be provided where a conclusion of no Adverse Effect on Integrity has been reached by the relevant Secretary of State following the loss or disturbance of habitat on a scale similar to that predicted for MLS SAC as a result of this Proposed Development?</p>
ME.2.07	Applicant	<p><b>Margate and Long Sands Special Area of Conservation Benthic Mitigation Plan</b></p> <p>In response to Natural England's comments regarding potential for impacts for Section 41 Natural Environment Research Council habitats and species (Items E5 and E17 in [PD2-007]), a commitment has been added to Margate and Long Sands Special Area of Conservation Benthic Mitigation Plan – Revision B [REP2-020] regarding the use of micro siting.</p> <p>Would this mitigation be effective for each of the habitats and species identified by Natural England in the aforementioned Relevant Representation? If so, what level of confidence can be placed on the mitigation and why?</p>
ME.2.08	Applicant	<p><b>Geotechnical surveys</b></p> <p>In its response to ExQ1 ME.1.08 in [REP2-039] the Applicant has stated that soil data currently held is sufficient to confirm that the cable could be buried and that further geotechnical surveying</p>

ExQ2 Responses by Deadline 4 (3 December 2024)

	Question to:	Question
		is not required prior to any consent. Have any other comparable developments followed a similar approach in relation to the timing of geotechnical surveys?
<b>Migratory Bats</b>		
ME.2.09	Applicant	<p><b>Habitats Regulation Assessment Screening Report – Zone of Influence</b></p> <p>Paragraph 3.6.1 of the Applicant’s HRA Screening Report [APP-042] states that there are no European sites designated for bat features within 25km of the on-shore export cable corridor.</p> <p>Noting the comments of the German Government at [RR-035] has the Applicant considered a zone of influence for European sites in the UK designated for bat features that could be affected by off-shore pathways? If so, can the Applicant confirm the zone of influence used, and reasons why, and if any bat features of sites within the zone are migratory. If this assessment has not been performed, can the Applicant explain why that is the case?</p>
ME.2.10	Natural England	<p><b>Effects on migratory bats</b></p> <p>It is noted that Natural England’s response to ExQ1 ME. 1.15 at [REP2-058] states that matters in relation to migrating bats are for Statutory Nature Conservation Body to consider. Nevertheless, as the Government’s advisor, the ExA requires Natural England to clarify its own position in this regard so that the ExA can inform the Secretary of State when it submits its recommendation following the conclusion of the Examination.</p> <p>As such, can Natural England confirm whether or not it considers that the Proposed Development would result in any adverse effects on migratory bats. If not, why not? If so, what mitigation would be required?</p>

ExQ2 Responses by Deadline 4 (3 December 2024)

	Question to:	Question
<b>Compensatory Measures – Ornithological Species</b>		
ME.2.11	Applicant	<p><b>Marine Recovery Fund (MRF)</b></p> <p>As a result of possible effects on the kittiwake, guillemot and razorbill features of the Flamborough and Filey Coast Special Protection Area, it would appear that the Applicant proposes (without-prejudice) the option to participate in Defra’s strategic compensation via the MRF.</p> <p>What strategic compensation projects does the Applicant envisage that the Proposed Development could contribute to under the MRF if chosen as an option? What would be the timescales for the delivery of such projects?</p>
ME.2.12	Applicant	<p><b>Compensatory measure delivery</b></p> <p>a) Explain which compensatory measures for various bird species require landowner consent and update the ExA in relation to any relevant on-going discussions in that regard.</p> <p>b) Noting that some compensatory measures would not be in the Order Limits, and without prejudice to the Secretary of State’s decision, what are the mechanisms that could be incorporated into a made Order to secure these compensatory measures?</p>
ME.2.13	Applicant	<p><b>Guillemot and Razorbill Implementation and Monitoring Plans</b></p> <p>It would appear that the Applicant is still in discussion with relevant stakeholders regarding the updated Guillemot and Razorbill Implementation and Monitoring Plans [REP2-016]. How would stakeholder participation be secured and through what mechanism? Could a draft agreement be submitted into the Examination?</p>
<b>Habitats Regulations Assessment</b>		
ME.2.14	Applicant	<p><b>Screening Matrices</b></p> <p>The Applicant should submit updated Habitats Regulation Assessment Screening Matrices [APP-043] that are consistent with the outcome of its screening assessment and European sites, qualifying features and impact pathways considered at appropriate assessment in [REP1-016] by Deadline 5.</p>

ExQ2 Responses by Deadline 4 (3 December 2024)

	Question to:	Question
<b>Marine Mammals</b>		
ME.2.15	Natural England	<p><b>Marine noise policy paper</b></p> <p>Issue H10 of Natural England’s risk and issues log [REP2-058] states that a marine noise policy paper is due to be published soon, to take effect from January 2025. Can Natural England update the ExA on the timescale for the publication of this document.</p>
<b>Ecology Onshore (EO)</b>		
EO.2.01	Tendring District Council (TDC) and Applicant	<p><b>TPO Trees and Veteran Trees</b></p> <p>Table D Tree Preservation Orders (TPOs) in Arboricultural Report [APP-255] provides only a reference number, with a broad description identifying only the number of trees present. Appendix B (Tree Constraints Plans), Drawing Number 2 Sheets 28 of 47 and 37 of 47 illustrate the presence of TPO trees with a non-specific Tree Preservation Order Location (yellow star) or Tree Preservation Order Tendring District Council 2023 (cross-hatched yellow).</p> <p>a) <b>For TDC</b> - in respect of Sheets 28 and 37 only, provide drawings at a scale 1:500 identifying any specific trees, by identification number/mark, which are likely to be impacted or subject to mitigation.</p> <p>b) <b>For TDC</b> – in respect of Sheets 28 and 37 only, are any of the trees identified as Veteran?</p> <p>c) <b>For Applicant</b> - where impacts are likely to occur on the TPO trees referenced above, whether in the form of pruning, lopping, root reduction or felling, provide reasons/justification for these actions and details of mitigation proposals to minimise the level of impact likely to occur.</p>



ExQ2 Responses by Deadline 4 (3 December 2024)

	Question to:	Question
<b>Navigation and Shipping (NS)</b>		
NS.2.01	Harwich Haven Authority	<p><b>Update with regards to the Statutory Harbour Authority’s views about the submitted application</b></p> <p>Further to the submission of your Relevant Representation [RR-043], update the ExA as to whether the Statutory Harbour Authority considers for the construction and/or operation of the proposed Five Estuaries Offshore Wind Farm there would or would not be adverse effects for:</p> <ul style="list-style-type: none"> <li>a) The safe navigation and passage for ships in the Sunk area.</li> <li>b) The safe navigation and passage for ships within the Harwich Haven Authority’s harbour limits.</li> <li>c) The safe navigation and passage for ships within the approaches to the Harwich Haven Authority’s harbour limits.</li> <li>d) The safe navigation and passage for ships within waters adjacent to the Harwich Haven Authority’s harbour limits.</li> <li>e) The safe and continued operation of the pilot boarding and landing stations within the Sunk area.</li> </ul> <p>If the Statutory Harbour Authority considers there would be any adverse effects, it should explain why that is the case and indicate whether such effects could be alleviated by any mitigation measures, including through the incorporation of Protective Provisions in favour of the Authority. Should the Harwich Haven Authority consider Protective Provisions would address any concerns it might have then it should submit wording for any such Protective Provisions.</p>
NS.2.02	Applicant	<p><b>Speed of cable burial within the export cable corridor</b></p> <p>During the discussion relating cable burial within the export cable corridor under agenda item 3.3 of Issue Specific Hearing 3 the Applicant intimated that the deeper the burial of cables the more time that is required and that there is a balance to be struck between the speed and depth of cable burial. Provide an indication of how much additional time is required for each additional metre of burial depth.</p>

## ExQ2 Responses by Deadline 4 (3 December 2024)

	Question to:	Question
NS.2.03	Applicant	<p><b>Fisheries Liaison and Coexistence Plan (FLCP)</b></p> <p>Further to the concerns expressed by the National Federation of Fishermen’s Organisations in their Deadline 2 submission [REP2-088] regarding the outline FLCP [REP1-037] respond to those comments, explaining your reasoning if you do not agree with any of the points and for those points you agree with, how and when you will update the FLCP to address them?</p>
NS.2.04	Applicant	<p><b>Cable Burial Risk Assessment (CBRA)</b></p> <p>Further to the concerns expressed by the National Federation of Fishermen’s Organisations in their Deadline 2 submission [REP2-088] that the outline CBRA [APP-239] is lacking in detail on how the risk associated with cables and fishing will be addressed, do you intend to update the CBRA? If so, when will an updated version of the CBRA be submitted?</p>
NS.2.05	East Anglia Two Limited	<p><b>Assessment of shipping and navigation risk</b></p> <p>Your Deadline 2 submission [REP2-079] notes that you are still evaluating the potential consequences of any navigational risks created by this project. When can the ExA expect to see your analysis, noting that we are almost a third of the way through the six month Examination period?</p>
NS.2.06	All IPs with a navigation and shipping interest	<p><b>Depth of cable burial within the export cable corridor (ECC)</b></p> <p>There appears to be a consensus of opinion between all parties in this Examination that where the ECC crosses the Sunk and Trinity Deep Water Routes (DWRs) the cables would need to be installed and maintained at a depth that would allow for the DWRs to be dredged and deepened in the future to a depth of at least 22 metres below Chart Datum. Does any party disagree that 22 metres depth is appropriate? If yes, please explain why?</p>
<b>Socio Economic Effects (SEE)</b>		
SEE.2.01	Tendring District Council and Essex County Council	<p><b>Vibration impacts from HGV construction traffic</b></p> <p>Vibration impacts from HGV construction traffic have been scoped out of the assessment undertaken by the Applicant in [Table 9.11, page 36 in APP-091]. Given Applicant’s intention to use Bentley Road as a route for Abnormal Indivisible Loads of up to 400 tonnes, do you consider the scoping out of vibration impacts from HGV construction traffic is appropriate for Bentley Road? If you do not agree with the scoping out of that effect from the Applicant’s assessment, explain</p>

ExQ2 Responses by Deadline 4 (3 December 2024)

	Question to:	Question
		why that is the case and advise on what you consider the Applicant should do to address this matter.
SEE.2.02	Tendring District Council and Essex County Council	<p><b>Mitigating construction noise via the submitted Code of Construction Practice (CoCP)</b></p> <p>Do you consider adequate measures for mitigating construction noise to an acceptable level would be available within the proposed CoCP [REP1-041] and could be secured through the provisions of the draft Development Consent Order [REP1-008]? If you consider the noise mitigation measures included in the CoCP would be inadequate, what additional measures do you consider should be included in the CoCP or secured by other means in any made DCO for the Proposed Development?</p>
SEE.2.03	Tendring District Council	<p><b>Cumulative construction noise effects in Bentley Road</b></p> <p>In paragraph 9.12.26 of the Airborne Noise and Vibration assessment [APP-091] the Applicant has acknowledged that the cumulative construction traffic noise in Bentley Road may not be adequately mitigated by the implementation of the proposed 40mph speed limit and that further mitigation in the form of: a speed limit below 40mph, the re-routing of HGV construction traffic; and undertaking sound insulation works for the affected dwellings.</p> <p>How practical and/or effective do you consider the implementation of additional mitigation measures such as lowering the speed limit below 40mph, the re-routing of HGV construction traffic; and undertaking sound insulation works would be?</p>
SEE.2.04	Tendring District Council and Essex County Council	<p><b>Assessment of cumulative operational noise for the Proposed Development onshore substation and the substations proposed for North Falls and the East Anglia Connection Node</b></p> <p>With respect to the assessment of cumulative operational noise from all three proposed substations, are you content that the Applicant has used suitable data and undertaken an appropriate assessment to reach the conclusion in paragraph 9.12.33 of [APP-091] that there would be a “<i>minor effect</i>” that would not be significant for noise sensitive receptors?</p>
SEE.2.05	Harwich Harbour Fishermen’s Association	<p><b>Outline Fisheries Liaison and Co-existence Plan</b></p> <p>Do you consider the measures included in the Outline Fisheries Liaison and Co-existence Plan [APP-247] would or would not be effective. If you consider the Co-existence Plan would be</p>

ExQ2 Responses by Deadline 4 (3 December 2024)

	Question to:	Question
		ineffective explain why that is the case and could any changes be made to the Liaison and Co-existence Plan to make it more effective?
<b>Seascape, Landscape and Visual (SLV)</b>		
SLV.2.01	Applicant	<p><b>Seascape - difference between the installation of 41 large or 79 small wind turbines</b></p> <p>With respect to seascape effects, explain what differences there might be between an offshore development of either 41 “large” or 79 “small” wind turbine generators.</p>
SLV.2.02	NGET	<p><b>Cumulative effects for the proposed onshore substations for Five Estuaries, North Falls and the East Anglia Connection Node</b></p> <p>What would be the likely height of any pylons supporting overhead wires transmitting electricity to and from the proposed East Anglia Connection Node substation and how would the height of those pylons compare with any existing NGET and UK Power Networks pylons in the area?</p>
SLV.2.03	Applicant	<p><b>Screen planting for the proposed onshore substation</b></p> <p>Further to the discussion relating to the screen planting proposals for the proposed onshore substation at Issue Specific Hearing 3, submit indicative cross sections for the screen planting for the proposed substation.</p>
SLV.2.04	Applicant and North Falls Offshore Wind Farm Limited (NFOWFL)	<p><b>Differences in approach to designing the onshore substation zone</b></p> <p>The ExA has become aware through the submission of the Written Representation from T Fairley and Sons Limited, Robert Fairley Limited and T and R Fairley Farming Partnerships [REP2-095] that the Applicant and NFOWFL in submitting their respective applications have taken different approaches for the onshore substation zone, with North Falls, amongst other things, relying on less land take. Explain:</p> <ul style="list-style-type: none"> <li>a) the rationale for the differences in approach that have been taken to designing the onshore substation zone that have arisen through the submission of the respective applications; and</li> <li>b) how any issues of incompatibility between the different designs could be reconciled were two DCOs to be made and both projects were to be implemented.</li> </ul>

ExQ2 Responses by Deadline 4 (3 December 2024)

	Question to:	Question
SLV.2.05	Essex County Council and Tendring District Council	<p><b>Approach to identifying landscape value within the vicinity of the proposed substation zone</b></p> <p>In your Local Impact Report [paragraph 9.1.2 in REP2-043] you have expressed concerns about the Applicant's approach to identifying landscape value within the vicinity of the proposed substation zone, ie within Landscape Character Area 7a Bromley Heaths. Clarify what your concerns are in this regard and if you do not agree with the medium landscape value attributed to this area by the Applicant explain why that is the case.</p>
<b>Terrestrial Transport and Traffic (TT)</b>		
TT.2.01	Suffolk County Council and Applicant	<p><b>Use of roads within Suffolk</b></p> <p>a) <b>For Suffolk County Council</b> – 1) Identify the roads which would be of concern to the Council if they were to be used by traffic associated with the construction of the Proposed Development and 2) explain why their use would be of concern.</p> <p>b) <b>For the Applicant</b> – Identify which: 1) ports other than the Port of Harwich that could potentially be used during the construction phase for the Proposed Development; and 2) any roads within Suffolk that might need to be used in association with the use of the ports identified under part 1) of this question.</p>

ExQ2 Responses by Deadline 4 (3 December 2024)

	Question to:	Question
TT.2.02	Applicant	<p><b>Outstanding concerns of National Highways</b></p> <p>National Highways (NH) in its Deadline 2 submission [REP2-062] set out the following six outstanding concerns in relation to the Transport Assessment:</p> <ul style="list-style-type: none"> <li>i) A summer sensitivity test must be assessed for all junction assessments.</li> <li>ii) The vehicular impact of the construction activity must be assessed based on a worst-case scenario at each junction individually as opposed to a network wide likely worst-case scenario.</li> <li>iii) Evidence is required that explains why a workforce occupancy rate of 1.5 people per car is a realistic assumption.</li> <li>iv) The method used to assign the vehicular trips to the Strategic Road Network (SRN) should be clarified. When assigning the trips to the network, the temporary construction compounds must be used as a destination to inform the trip assignment.</li> <li>v) A junction capacity assessment must be undertaken at the A120/Harwich Road junction, the A120/Bentley Road junction, the A120/B1035 junction and any other A120 junctions experiencing over 30 additional vehicle movements during the peak hour. Additionally, should the required changes to the trip assignment result in greater impacts at other SRN junctions (over 30 vehicles), these should also be assessed through junction capacity assessments.</li> <li>vi) Peak period growth rates should be used in the assessment of any junctions.</li> </ul> <p>Provide an update on the progress that is being made to address each of the six issues of concern to NH.</p>
TT.2.03	Applicant	<p><b>Assessment of cumulative effects</b></p> <p>At paragraph 8.12.16 of the Traffic and Transport chapter (Revision B) of the Environmental Statement [REP1-018] in relation to the National Grid Norwich to Tilbury Reinforcement Project you state: <i>“To inform the cumulative Traffic and Transport assessment, National Grid has provided some indicative HGV and construction workforce vehicle movements...”</i></p> <p>Can you confirm that the vehicle movement information you were provided is consistent with that set out in the Norwich to Tilbury Preliminary Environmental Information Report (Appendices 16.1 to 16.3) published by National Grid for consultation between 10 April and 18 June 2024?</p>

ExQ2 Responses by Deadline 4 (3 December 2024)

	Question to:	Question
TT.2.04	Applicant	<p><b>Use of Little Bromley Road and Ardleigh Road by construction traffic</b></p> <p>In the updated Chapter 8 of the ES (Traffic and Transport) [REP1-018] reference is made to Little Bromley Road and Ardleigh Road being used by construction traffic. During the course of ISH3 you explained that the use of those roads would be required so that the Proposed Development's construction traffic could avoid passing through the construction site for the proposed East Anglia Connection Node's substation. In order to make use of Little Bromley Road and Ardleigh Road it appears construction traffic would also need to make use of other roads (links) in order to get to or from any of the A class roads in the area.</p> <p>Chapter 8 of the ES does not provide details of the intended entire route between any of the A roads in the area and Little Bromley Road and Ardleigh Road, accordingly the Applicant should:</p> <ul style="list-style-type: none"> <li>a) submit a plan showing the entirety of the proposed construction traffic route that would utilise Little Bromley Road and Ardleigh Road;</li> <li>b) provide daily construction traffic movement projections for the entirety of this proposed construction traffic route; and</li> <li>c) explain whether it would or would not be possible for the construction sites within the proposed substation zone to be designed so as to avoid the need for the Proposed Development's construction traffic to route through the site for the proposed East Anglia Connection Node.</li> </ul>
TT.2.05	Suffolk County Council and Applicant	<p><b>Cumulative effects of other projects</b></p> <ul style="list-style-type: none"> <li>a) <b>For Suffolk County Council</b> - in your Local Impact Report (LIR) at paragraph 8.12 of [REP2-046] you highlight that the A12 Major Road Network scheme, a programme of improvement works between the A12/A14 junction at Seven Hills and the A12/A1152 junction at Woods Lane in Suffolk, may overlap temporally with the Five Estuaries project and therefore should be included in the assessment of cumulative effects. Could you confirm your understanding of the timetable for the A12 Major Road Network scheme?</li> <li>b) <b>For the Applicant</b> – do you consider that A12 Major Road Network scheme should be included in the assessment of cumulative effects for the Five Estuaries project? If not explain why that is the case.</li> </ul>

ExQ2 Responses by Deadline 4 (3 December 2024)

	Question to:	Question
TT.2.06	Applicant	<p><b>Use or otherwise of the A137 within Suffolk</b></p> <p>Suffolk County Council in its Local Impact Report [REP2-046] highlights that special order vehicular movements across the A137 Ostrich Creek bridge require a temporary structure, the installation and removal of which creates significant disruption to local traffic.</p> <p>Given this concern from Suffolk County Council, can the Applicant confirm that it will not use the A137 within Suffolk for transporting Abnormal Indivisible Loads?</p>
TT.2.07	Suffolk County Council and Applicant	<p><b>Vehicle movements associated with the Lesser Black-Backed Gull compensation area</b></p> <p>a) <b>For Suffolk County Council</b> - In your LIR [REP2-046] you set out concerns that duration and intensity of vehicular activity at Orford Ness associated with the Lesser Black-Backed Gull compensation area is not known. What volume of traffic generation do you consider would cause an adverse effect in this location?</p> <p>b) <b>For the Applicant</b> - Do you have a view on this matter?</p>
Onshore Water, Hydrology and Flood Risk (WE)		
WE.2.01	Environment Agency and Essex County Council as Lead Local Flood Authority	<p><b>Infiltration/Soakaway Testing</b></p> <p>Table 6-12 in [APP-088] states '<i>The detailed (post-consent) design of the surface water drainage scheme would be based on a series of infiltration/soakaway tests carried out on site and the required attenuation volumes will be outlined in the supporting OnSS FRA. The tests will be undertaken prior to construction and in accordance with the BRE Digest 365 Guidelines in order to determine the suitability of ground for accepting a drainage discharge</i>'.</p> <p>a) Are BRE Digest 365 Guidelines the most appropriate for a project of this scale, both individually and cumulatively with other proposed projects in and around the proposed Onshore substation?</p> <p>b) If BRE Digest 365 Guideline are not appropriate for this project individually or in combination with other proposed projects what would be the most appropriate test or tests to accommodate, to date unknown, attenuation volumes?</p>
WE.2.02	Environment Agency	<p><b>Hydraulic Conductivity</b></p> <p>The Environment Agency (EA) in [RR-026] in referring to [APP-088] commented "<i>If dewatering</i></p>



ExQ2 Responses by Deadline 4 (3 December 2024)

	Question to:	Question
		<p><i>during construction requires a licence a more rigorous approach to assessing hydraulic conductivity will likely be required”.</i></p> <p>The applicant responded in [PD4-006] <i>“following completion of the water features survey, ground investigation and groundwater monitoring (as proposed within Section 4.3 of the assessment) it is considered that there is likely to be a need for dewatering and to obtain an abstraction transfer licence then further location specific site investigations would be completed (pump test or slug tests, as considered appropriate) to allow for further refinement of the hydraulic conductivity in the vicinity of the proposed works.”</i></p> <p>The EA provided further comment in [RR-026] stating that <i>“The applicant has submitted a thorough list of potentially impacted abstractions (licensed and unlicensed) and risk assessments to those abstractions. Those that have been deemed potentially impacted by trenched and trenchless cable replacement and substation have been noted and steps to improve the impact assessment have been added in 4.3.1 Water Features Survey. We look forwards to seeing the results of this survey and subsequent risk Assessment.”</i></p> <p>The EA in [RR-026] in referring to the Code of Construction Practice [APP-253, which was extant at the time] states that <i>“the earlier the risks can be assessed in the event an abstraction licence is required for these works.”</i></p> <p>In the absence of survey, ground investigation and monitoring data relating to actual hydraulic conductivity in and around the Proposed Development, are you content that that adequate mitigation measures could be put in place to control ground water flow? If not explain why that is the case and advise on how your concern could be addressed.</p>

ExQ2 Responses by Deadline 4 (3 December 2024)

	Question to:	Question
WE.2.03	Applicant	<p><b>Springs</b></p> <p>In the Applicant’s response in [PD4-004] to Environment Agency’s [RR-026] you have stated “A walkover of the route by a hydrologist and a review of Ordnance Survey mapping was undertaken to identify any marked springs, none were identified within the 250m search radius.”</p> <p>a) During which months of the year were the walkovers by a hydrologist undertaken?</p> <p>b) If the answer to a) is during the summer period what certainty can there be in the “marked springs” not being evident during the winter months?</p>
WE.2.04	Applicant	<p><b>Abstraction – Horizontal Directional Drilling (HDD)</b></p> <p>The EA in [RR-026] has stated “The HDD process will require a supply of water - the applicant suggests wither tinkering or abstracting surface water for this purpose ...Please check the local Abstraction Licensing Strategy for current water availability in the relevant catchments.”</p> <p>a) What is wither tinkering?</p> <p>b) Has the Abstraction Licensing Strategy been checked and does it confirm currently that there is sufficient availability at the locations where HDD is proposed?</p>
WE.2.05	Environment Agency	<p><b>Hydraulic continuity</b></p> <p>The EA in [RR-026] has made reference to “a request for inclusion of an assessment of any works at the landfall stage will not create any hydraulic continuity between the sea and underlying strata ... and ... the implied possibility of hydraulic continuity between the two is not mentioned for the jointing bays or HDD”. The Applicant has stated in [PD4-006] that ‘The assessment notes that the geology at this location is alluvial silts and clays with little or no groundwater and no risk to the SSSI is identified.</p> <p>Has the Applicant’s response addressed the EA’s concern or does the EA consider there is a need for any further assessment?</p>

ExQ2 Responses by Deadline 4 (3 December 2024)

	Question to:	Question
WE.2.06	Applicant	<p><b>Flood Risk Assessment (FRA)</b></p> <p>The EA in [RR-026] has stated “<i>to comply with national policy the application is required to pass the Sequential [test] and be supported by a site specific Flood Risk Assessment (FRA)</i>’.</p> <p>Will a site-specific FRA be produced and submitted, before completion of the Examination, in respect of all areas subject to fluvial and tidal Flood Zone 3a?</p>
WE.2.07	Essex County Council as the Lead Local Flood Authority	<p><b>Other Flood Risk</b></p> <p>The EA in [RR-026] has stated “<i>the site may be within an area at risk of flooding from surface water, reservoirs, sewer and/or groundwater</i>”.</p> <p>Has the Applicant adequately addressed matters relating to risk of flooding from sources that are not under the EA’s jurisdiction?</p>
Land Use and Agriculture (LU)		
LU.2.01	Farming Interested Parties and Applicant	<p><b>Cable laying depth with the onshore cable corridor</b></p> <p>Multiple Interested Parties who are farmers in their Relevant Representations and/or subsequent written submissions and during ISH3 have contended that it would be more appropriate within the onshore cable corridor for cables to be buried at a depth of not less than 1.2 metres rather than 0.9 metres as proposed by the Applicant.</p> <p>a) <b>For Farming Interested Parties</b> - Explain why you consider a cable depth of 1.2 metres would be necessary;</p> <p>b) <b>For the Applicant</b> - explain why an indicative minimum soil cover of 0.9 metres above the buried cable rather than 1.2 metres has been identified for the Proposed Development; and</p> <p>c) <b>For the Applicant</b> - advise on whether you would be prepared to bury cables at a minimum depth of 1.2 metres and if not explain why that is the case.</p>

	Question to:	Question
LU.2.02	Applicant	<p><b>Temporal Impacts – Export Cable Corridor (ECC)</b></p> <p>In paragraph 3.1.12 of [REP2-030] it is stated “enabling works such as site preparation and access are conducted, then the trenches are excavated, the ducts are installed, the backfilling is conducted (but not all the topsoil), the cables are pulled (potentially by a separate contractor than the trenching), testing &amp; commissioning are completed (but this must occur after the OnSS is complete), then final topsoil and reinstatement is conducted”.</p> <p>Paragraph 3.1.13 in [REP2-030] goes onto state “The cables may only be installed and connected immediately in advance of the project energization and therefore cable ducts for all sections needs to be installed in advance of this and access to joint bay locations within all sections retained for cable installation. As noted within paragraph 1.4.10 of the Onshore Project Description [AS-004] within some area’s reinstatement can occur as soon as cable ducts are installed, such as between joint bays.</p> <p>In paragraph 3.1.14 of [REP2-030] it is concluded “Seasonal restrictions for works in particular areas may be identified due to ecological or other receptors and avoidance of working within wet weather windows may be required (for example to protect soils). Therefore, the construction sequence of the works would also need to take account of these restrictions.’ That statement is to an extent ameliorated by what is stated in paragraph 4.4.6 of [REP2-030] “the equipment for conducting the HDDs, trenching and ducting is likely to be similar. It is hence efficient for the projects to conduct this work on each other’s behalf and will result in lower level of impact as the various equipment is only being moved to site and used once”. However, continuing in paragraph 4.4.9 the Applicant has stated “... the programme and timing of cable installation would be different for the two Projects”.</p> <p>Consequently, there is potential that any delays in cable pulling and construction of the proposed onshore substation could result in large areas of exposed soils and open trenches bisecting agricultural land, which could be further compounded by the need to test and commission the installed cables.</p> <p>a) For clarity, could substantial sections of the export cable corridor (ECC) only be backfilled with sub-soil, pending commissioning as suggested above?</p>

**ExQ2 Responses by Deadline 4 (3 December 2024)**

	<b>Question to:</b>	<b>Question</b>
		<p>It was stated during ISH3 in relation to time scales that the trenching and ducting would take “<i>six to nine months</i>”.</p> <p>b) Does that timescale relate to each discrete section of the ECC i.e. between joint bays and the works to engineer the joint bays, trench and install the ducts?</p>