

**Application by Five Estuaries Offshore Wind Farm Limited for the Five Estuaries Wind Farm  
Essex County Council (ECC) & Tendring District Council (TDC) Joint Responses to ExQ3 by Deadline 7: 3 March 2025**

Development Consent Order (DCO) 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 5 [REP5-007]		
DCO.3.07	Applicant, Tendring District Council and Essex County Council	<p><b>Onshore collaboration with the Undertaker for the proposed North Falls Offshore Wind Farm</b></p> <p>a) Is there a need for a requirement, along the lines of Requirement 33 of the made DCO for Sheringham Shoal and Dudgeon Offshore Wind Farm extensions [section 8 (e-page1,885) in REP4-044] obliging the undertakers for the Proposed Development and the proposed North Falls Offshore Wind Farm to have collaborated with one another prior to their plans or documents being submitted to the relevant local planning authority for approval pursuant to relevant requirements?</p> <p>b) For Applicant - Submit, on a without prejudice basis, appropriate wording for a project collaboration requirement</p>
Response:	ECC & TDC	(a) The Councils fully support the inclusion of a Requirement in the DCO that obliges the adjacent undertakers of the Proposed Developments (FE, NFOW and National Grid EACN) to have collaborated with each other prior to the submission of documentation to the relevant planning authority for approval.
DCO.3.09	Affinity Water Limited, Cadent Gas Limited, Environment Agency, Essex County Council, London Gateway Port Limited, National Highways, Network Rail, North Falls Offshore Wind Farm Limited and Port of London Authority	<p><b>Protective Provisions</b></p> <p>With respect to negotiating Protective Provisions, advise on what the current position is with respect to agreeing a set of Protective Provisions in your favour with the Applicant. Where there is disagreement with the Applicant explain why that is the case and where any disagreement relates to matters of detailed drafting submit the version of your preferred text.</p>
Response:	ECC	<ul style="list-style-type: none"> <li>• <b>Highways Protective Provisions</b> ECC have recently shared both the PPs and the Framework Highways Agreement that we are seeking with the Applicant. Discussions are ongoing on both these documents.</li> <li>• <b>Drainage Protective Provisions</b> Ongoing discussions which are nearing completion, we are positive that the outstanding matters could be resolved.</li> </ul>

DCO.3.18	Tendring District Council	<p><b>Schedule 12 Part 1 (Tree Preservation Orders [TPO])</b></p> <p>Section 5 of the Arboricultural Report [APP-255] identifies trees T1, T2 and G2 subject of TPO 23/00005/TPO (between Stones Green Road and operational and maintenance access routes) as requiring mitigation. With no potential impacts for the other trees subject to TPO 23/00005/TPO on or the trees subject to TPO 21/00009/TPO.</p> <p>However, Part 1 of Schedule 12 of the dDCO seeks to extend the potential for impacting on all of the trees subject of TPO 23/00005/TPO and TPO 21/00009/TPO.</p> <p>Advise whether you are content with extending the potential for impacts on all trees subject of both TPO's cited in Part 1 of Schedule 12?</p>
Response:	TDC	<p>Part 1 of Schedule 12 of the draft Development Consent Order (dDCO) identifies additional harm to trees afforded formal legal protection by Tree Preservation Order (TPO) 23/00005TPO and 21/00009/TPO over and above that initially set out in Schedule 12 Part 1 (Tree Preservation Orders) {TPO}.</p> <p>In principle, the Councils are content with extending the potential impacts. In this regard, every effort should be made to avoid removal or harm of countryside trees and hedgerows. If any preserved or other trees are felled to implement the proposed development, then extensive mitigation planting should be carried out to remediate harm caused.</p>
<b>Ecology Onshore (EO)</b>		
EO.3.02	Essex County Council and Tendring District Council	<p><b>Essex Green Infrastructure (GI) Strategy and Essex GI Standards</b></p> <p>Have the proposals as set out in the outline Landscape and Ecological Management Plan (OLEMP) [REP2-022] sufficiently demonstrated that the guiding principles set out in the Green Infrastructure Delivery Plan have been applied?</p> <p>In section 10.5 of your Local Impact Report [REP2-043] reference is made to the emerging Greater Essex Local Nature Recovery Strategy (GELNRS).</p> <ol style="list-style-type: none"> <li>a) When is it expected that the GELNRS will be adopted?</li> <li>b) Provide extracts of the strategic opportunity maps that are relevant to the onshore elements of the Proposed Development.</li> </ol>
Response:	ECC & TDC	<p>In principle, the Outline Landscape and Ecological Management Plan (OLEMP) does align with the Essex Green Infrastructure (GI) Strategy objectives and Essex GI standards in several ways:</p> <ol style="list-style-type: none"> <li>1. <b>Protect: Improve: Integration of GI:</b> <ul style="list-style-type: none"> <li>○ The OLEMP includes measures to integrate GI into the Five Estuaries wind farm infrastructure, mitigating environmental impacts and enhancing biodiversity.</li> </ul> </li> <li>2. <b>Evidence – led</b> <ul style="list-style-type: none"> <li>○ The OLEMP incorporates baseline ecological surveys, stakeholder consultations, and adherence to national and local policies. It follows established planting and species guidelines and standards,</li> </ul> </li> </ol>

includes provisions for long-term monitoring and management. The OLEMP states that as the mitigation proposals are further developed post consent, the process will be informed by the nine GI Standards. It is recommended as the OLEMP develops to consult the Essex LNRS.

**3. Improve, Create, connectivity: Multifunctionality**

- The plan proposes extensive planting of trees, hedgerows, and understorey shrubs to create effective visual screens and green corridors, connecting existing habitats and enhancing the landscape character.
- It outlines the creation and enhancement of S41 priority habitats, including lowland meadow, species – rich grasslands, ponds, and broadleaved woodlands, contributing to biodiversity net gains and ecosystem resilience.
- The plan also includes the use of SuDS to manage surface water, with proposals to retain temporary SuDS features for biodiversity benefits, aligning with the Essex GI Standards for sustainable water management.

**4. Early and ongoing stakeholder engagement, Managing Different Expectations**

- The plan emphasises stakeholder engagement in the development and implementation of the LEMP, ensuring alignment with local needs and priorities.

**5. Health and Wellbeing and Social Equity**

- The OLEMP aims to enhance the PRoW by providing visual screening and planting adjacent to roads, PRoWs, and properties to improve aesthetics, and the creation of green corridors to connect existing habitats, promoting a pleasant walking experience.

**6. Strong wording and commitment**

- The commitment to requirement 12 LANDSCAPE AND ECOLOGY MANAGEMENT PLAN that “(1) *No stage of the onshore works may commence until for that stage a written landscape and ecological management plan in accordance with the outline landscape and ecology management plan as appropriate for the relevant stage, has been submitted to and approved by the relevant planning authority.*”

**7. Sustainability: Stewardship**

- The OLEMP commits to long-term monitoring and management of created habitats to ensure they meet biodiversity and green infrastructure objectives.

**Essex Local Nature Recovery Strategy**

- a) The Essex Local Nature Recovery Strategy is set to be published and adopted in July 2025.
- b) The maps have not been published and as a result of the consultation it is understood that there may be minor edits to the mapping, but you can email [nature.partnership@essex.gov.uk](mailto:nature.partnership@essex.gov.uk) or contact Elias Watson - Local Nature Recovery Coordinator [elias.watson@essex.gov.uk](mailto:elias.watson@essex.gov.uk) to provide further details.

In summary the Essex LNRS includes two main types of maps:

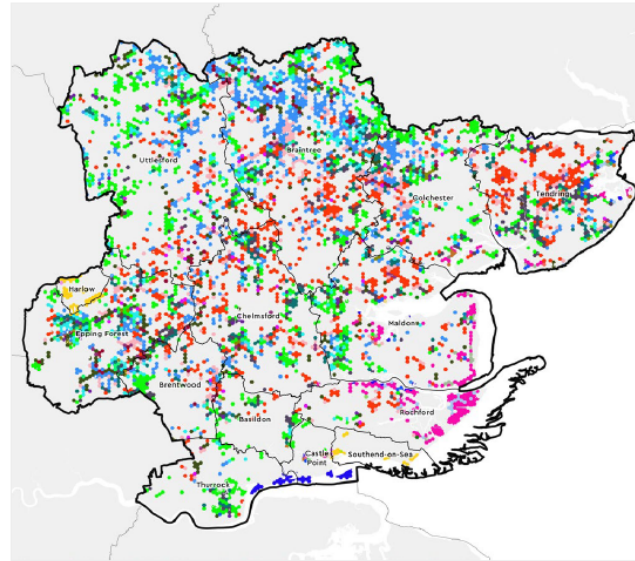
- **Areas of Particular Importance for Biodiversity (APIB) Maps:** These maps highlight national conservation sites, local nature reserves, local wildlife sites, and irreplaceable habitats in Essex, covering a total of 56,226.27 hectares, which is 14% of the county.
- **Opportunity Maps:** These maps identify areas in Essex that could become important for biodiversity and help connect existing habitats. They outline potential measures to create larger, better-connected habitats in line with biodiversity priorities.

The opportunity maps in the Essex Local Nature Recovery Strategy (LNRS) are divided into two types:

- **All Creation Opportunities Maps:** These maps show all locations of particular importance for biodiversity, including areas that overlap with Areas of Particular Importance for Biodiversity (APIB).
- **Strategic Creation Opportunities Maps:** These maps highlight the top locations within all available opportunities that have the greatest potential to benefit nature and the environment. These strategic sites, selected by Local Authorities, are eligible for a 15% uplift on standard biodiversity units and do not overlap with APIBs. They cover 119,172.53 hectares (30.18% of Essex) and aim to increase green and blue infrastructure to 25% of Essex by 2030.

Screen shot below of the All Creation Opportunities maps taken from the consultation document:

### 5.3 Opportunity maps



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### Map 3: Combined Strategic Creation Opportunities

Areas that could become of particular importance – 'strategic' combined habitat creation opportunities.

Analysis results presented as a generalised 0.25km<sup>2</sup> hexagonal grid and categorised by habitat type. All combined 'strategic' habitat creation opportunities cover 30% of the Greater Essex LNR region. APIBs removed. ABIPs removed from all categories, apart from 'Strategic Sites selected by Local Authority'.

#### Key

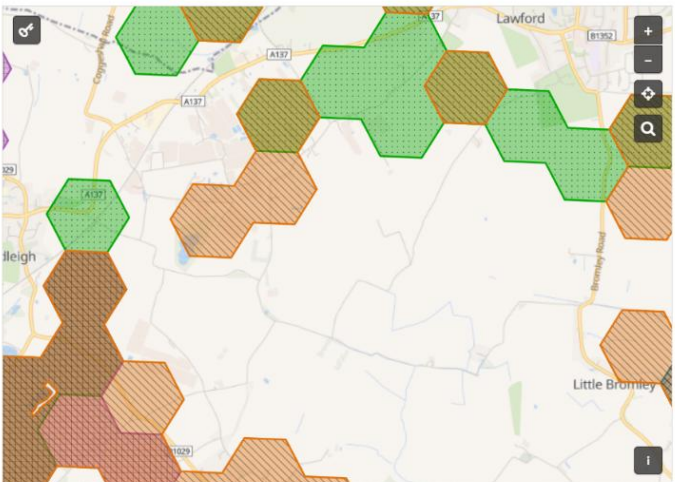
- Woodland Only (1)
- Grassland Only (1)
- Freshwater Standing Water Only (1)
- Freshwater River Buffer Only (1)
- Coast Only (1)
- Marine Only (1)
- Strategic sites selected by Local Authority only (1)
- Woodland and Grassland (2)
- Woodland and Freshwater Standing Water (2)
- Woodland and Freshwater River Buffer (2)
- Woodland and Coast (2)
- Grassland and Freshwater Standing Water (2)
- Grassland and Freshwater River Buffer (2)
- Grassland and Coast (2)
- Grassland and Strategic sites selected by Local Authority (2)
- Freshwater Standing Water and Freshwater River Buffer (2)
- Freshwater Standing Water and Coast (2)
- Freshwater River Buffer and Coast (2)
- Marine and Strategic sites selected by Local Authority
- Woodland, Grassland and Freshwater Standing Water (3)
- Woodland, Grassland and Freshwater River Buffer (3)
- Woodland, Grassland and Coast (3)
- Woodland, Freshwater Standing Water and Freshwater River Buffer (3)
- Woodland, Freshwater Standing Water and Coast (3)
- Grassland, Freshwater Standing Water and Freshwater River Buffer (3)
- Grassland, Freshwater Standing Water and Coast (3)
- Grassland, Freshwater River Buffer and Coast (3)
- Grassland, Coast and Marine (3)
- Freshwater Standing Water, Freshwater River Buffer and Coast (3)
- Woodland, Grassland, Freshwater Standing Water and Freshwater River Buffer (4)
- Woodland, Grassland, Freshwater Standing Water and Coast (4)
- Woodland, Grassland, Freshwater River Buffer and Coast (4)
- Woodland, Freshwater Standing Water, Freshwater River Buffer and Coast (4)
- Grassland, Freshwater Standing Water, Freshwater River Buffer and Coast (4)
- Grassland, Freshwater Standing Water, Freshwater River Buffer and Strategic sites selected by Local Authority (4)
- Woodland, Grassland, Freshwater Standing Water, Freshwater River Buffer and Coast (5)

Below is a zoomed-in view of the Combined Strategic Habitats creation maps. While there are no strategic opportunities identified for the substation area that are eligible for a 15% uplift on standard biodiversity units, the maps do show nearby habitats such as freshwater and grassland connectivity opportunities. The all creation opportunities map may offer a broader scope of habitat opportunities for the area.

Essex Local Nature Recovery St. | consultations.essex.gov.uk/rc/20796d64/

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### Combined Strategic Habitat Creation Opportunities



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In relation to landscape and visual issues, the OLEMP [REP2-022] now firmly references the guiding principles of the Essex Green Infrastructure Delivery Plan in Section 2.4.

In relation to whether the proposals demonstrate delivery of those principles:

- We welcome inclusion of the proposed woodland buffer to the east of Normans farm that extends the GI into the wider countryside providing a wider connected GI network (Section 2.4.2.)
- Whilst the proposals provide visual mitigation for local residents and visiting public, there are no direct active benefits of the GI as no additional permissive or other pedestrian access has been provided as part of the GI.

OLEMP Section 2.4.5 identifies the proposals will meet the following key objectives of the GI Delivery Plan: ‘... improve existing green infrastructure so it is better functioning for people and wildlife; create more high-quality multi-functional green infrastructure, especially in areas of deficiency; and improve the connectivity of green infrastructure for people and wildlife.’ However, it is still unclear how the proposals will actually improve the existing green infrastructure, beyond its ecological role, rather than just mitigating the effects of the development proposals.

Seascape, Landscape and Visual (SLV)		
SLV.3.01	Applicant, Tendring District Council, Essex County Council, North Falls Offshore Windfarm Limited (NFOWL) and National Grid Electricity Transmission (NGET)	<p><b>Detailed design within the onshore substation zone</b></p> <p>The ExA notes that under sub-paragraph 5(b) of Requirement 10 of the made DCO for the Sheringham Shoal and Dudgeon Extensions Offshore Wind Farm the detailed design for the onshore substations for that project must be subject to a design review to be undertaken by an independent design review panel prior to seeking detailed design approval from the relevant planning authority's approval [e-page 1,876 in REP4-044]. Having regard to the Applicant's, NFOWL's and NGET's intention that there would be three onshore substations in close proximity with one another:</p> <ul style="list-style-type: none"> <li>a) Should the detailed design for the substations within the onshore substation zone be subject to review by an independent design review panel? In answering this question if you consider there should not be an independent design review process explain why that is the case.</li> <li>b) For the Applicant – submit wording for an independent design review mechanism, for incorporation into Requirement 5 (Onshore substation works etc) of the dDCO (on a without prejudice basis should you not be agreeable to there being a design review by an independent panel).</li> </ul>
Response:	ECC & TDC	<p>The Councils support an independent review of the detailed designs for all substations within the substation zone. Scrutiny of the collective projects is required in order to ensure that the landscape and visual vision for the three projects is coherent and appropriate and fulfils the requirements of the respective LVIA's. The current proposals in 9.4 onshore Substation Design Principles Document – Revision B (REP6-018) require clarity on who, how and where the Design Champion / s and the members of the Design Review Panel will be appointed. As such, we propose the Essex Quality Review Panel or similar independent body which would be agreed by the relevant Planning Authority, are approached for their input.</p> <p>It is noted in REP6-018 para 2.2.1 reference is made to a collaborative design approach including National Grid Electricity Transmission's East Anglian Connection Node (EACN). This is not reflected in the current dDCO (REP6-007) where Work No. 16 refers to the National Grid substation, for clarity the Councils propose 'the new National Grid substation' as stated in Work No.16 (a) or reference to the 'proposed National Grid Electricity Transmission's East Anglian Connection Node (EACN)'.</p>
SLV.3.02	TDC & ECC	<p><b>Visual mitigation within the substation zone</b></p> <p>With respect to the visual mitigation within the substation zone, most particularly the northern elevations of the proposed substations for the Proposed Development and the North Falls Offshore Wind Farm. How effective do you consider orchard planting combined with hedgerows and hedgerows with trees (shown on Drawings 2 and 3 in the OLEMP [REP2-022]) would be, having regard to the likely height of the proposed substations and their proximity to Grange Road? Would planting other than orchard planting be more effective?</p>
Response	ECC & TDC	We do not consider that orchard planting would successfully deliver visual impact mitigation along the northern border, although acknowledge potential ecological and social benefits could accrue. We have previously suggested

		that similar benefits could be obtained by planting hazel coppice that would be easier to manage. However, we judge that a hybrid of orchard trees or coppice hazel with the addition of woodland buffers that reinforce the existing field boundary system, and where this is deliverable in operational terms, would provide the optimum solution.
Terrestrial Transport and Traffic (TT)		
TT.3.01	Tendring District Council and Essex County Council	<p><b>Outline Public Access Management Plan</b></p> <p>The Applicant has submitted a revised Outline Public Access Management Plan (Revision B) [REP5-037] at Deadline 5. Does this address any concerns you might have regarding the interaction with Public Rights of Way during the construction of the onshore cable corridor, or are there any outstanding matters of concern? If there are any outstanding concerns, how might they be addressed by the Applicant?</p>
Response	ECC & TDC	<p>The Council have made comments that the naming of the PRoW should align with the actual names, ensuring clarity on the location and affected PRoW. The Public Access Management Plan (PAMP) has been updated at [REP5-037] and includes specific reference to the affected parish at Table 3.1. Whilst this is helpful, it still relies on reviewers moving between different documents and as a result makes interrogation and understanding more difficult for a complex project. The aim of a DCO should be for it to be as accessible and transparent as reasonably possible.</p> <p>The Council note that the OLEMP has been updated at [REP6-026] and includes the commitment to “<i>Ensure there is a minimum of 3m distance between screening planting on any PRoWs. This ensures that planting will not obstruct the use of the PRoW, even if it is not properly maintained by the landowner/site operator</i>”. On this basis, this issue is considered resolved.</p> <p>The Council requested that a final version of the management plan be included on the Applicant’s website. It is noted that there is now a commitment at Section 2.3 [REP5-037] which commits to engagement by the Applicant. On this basis, this issue is considered resolved.</p> <p>Paragraph 3.1.12 sets out the approval process for the final PAMP. This is acceptable; however, it is requested that an amendment is made so that any changes to the plan, also require approval by the highway authority, so it is clear that this process will be followed. Subject to this change the matter can be considered to be resolved.</p> <p>The Council had raised concerns regarding management of heavy vehicles at PRoW crossing points. It is noted that additional text has been added at 3.2.13 and 3.2.14 of [REP5-037], which includes provision of suitable visibility at crossing points and depending on the use of the ProW, the use of banksmen.</p>
TT.3.02	National Highways, Essex County Council and Suffolk County Council	<p><b>Projects considered within cumulative assessment of traffic effects</b></p> <p>As agreed during ISH3, please confirm that the projects set out in Section 8.12 of the Traffic and Transport Chapter of the Environmental Statement (ES) (current draft version of which is found at Appendix 3 of the Applicant’s response to ISH3 Action Points [REP3-023]) can be treated as a finalised list of projects scoped in or out of assessment at the close of this Examination. If there are any new projects not currently captured in the above, please provide sufficient detail of the project(s) such that the Applicant can consider whether or not they should be added into a finalised version of the cumulative assessment of traffic effects.</p>



		<p><b>For the Applicant</b> – please confirm that you will be submitting a final version of the ES Traffic and Transport Chapter, and any supporting documents into the Examination incorporating the changes in [REP3-023] and any further necessary amendments by no later than Deadline 8.</p>
Response	ECC & TDC	<p>From a transport and traffic perspective the Councils are content with the projects included in the scope of the cumulative assessment.</p> <p>The above being said, the Councils have undertaken an up-to-date review, as it was considered helpful to identify any further developments that are in the local area that may have been appropriate to consider. In all cases, it was considered reasonable to either scope them out of the assessment, due to how developed the proposals are, or the timeframe for delivery of the schemes, or that they are on the fringes of the assessed network, or that their impacts would be picked up in background growth.</p> <p><b>Navy Yard Wharf Kings Quay Street Harwich Essex CO12 3JJ:</b>  <b>Planning Application: 19/01837/FUL</b> - Hybrid Application consisting of: Full Planning Permission for demolition of existing car park, pitched roof warehouse, brick office building and associated structures. Erection of new flood defences and mixed-use development comprising of 139 class C3 dwellings (125 homes and 14 flats), 971m2 (GIA) of commercial space (Class E, Classes F1 and F2 and Hot Food Takeaway) with associated refuse and recycling storage facilities. Outline Planning for redevelopment of remainder of the site for Class E, Classes F1 and F2, and Class B8 uses, including site access (excluding internal roads/routes) with all other matters (appearance, landscaping, layout, and scale) reserved.  ECC Comments: Application is awaiting a decision. On that basis, it is considered reasonable to scope out.</p> <p><b>Hartley Gardens – Clacton on Sea (north of St Johns Road):</b>  Local Plan site, residential development, circa 1,870 dwellings which represents the allocation of 1,700 plus a 10% addition)  ECC Comments: Currently not submitted yet (it is still at pre-app. stage). On that basis, it is considered reasonable to scope out.</p> <p><b>Land East of Pond Hall Farm Stour Close Harwich Essex</b>  One committed development, planning applications: 14/01431/OUT/ 20/00385/OUT- Outline approval for development of site to create employment units, cafe / restaurant units, public house, drive thru restaurants, cinema, hotel, up to 297 dwellings, landscaping, open space &amp; associated means of access, internal estate roads &amp; car parking. Full approval for the creation of retail shop units, foodstore, petrol filling station, associated highway works &amp; improvements including a new roundabout off the A120 &amp; link road, earthworks, service infrastructure &amp; other associated works &amp; improvements.</p>

		ECC notes that, on the National Highways network, there is a commitment to construct a new roundabout off the A120 to the north of the development, which will form the main access to the development, although no timescales at present. Considered reasonable to scope out.
Onshore Water, Hydrology and Flood Risk (WE)		
WE.3.01	Essex County Council (Local Lead Flood Authority)	<b>Flood Evacuation Plan</b> Would the provisions within Section 4.8 of the Code of Construction Practice (CoCP) [REP5-033] accord with the provisions of Policy PPL 1 (Development and Flood Risk) of Section 2 of the Tendring District Local Plan 2013-2033 (adopted January 2022)? If you consider there would be conflict with Policy PPL 1, how might the CoCP be amended to achieve accord with Policy PPL 1?
Response	ECC & TDC	<p>Having regard to the provisions of Section 4.8 of the CoCP, TDC's Emergency Planning Team's view is that the document has failed to demonstrate compliance with Policy PPL1 because the section appears generic and not specific to the District and area concerned. Section 4 and (also relevant) Section 6 of the CoCP fail to provide any meaningful information on Flood Management and Response and Emergency Response Procedures and Contacts.</p> <p>In particular, Section 4 (Flood Management and Response): There is no reference to the coastal flood warning area that some of this operation is happening in. There is no reference in respect of what action would be taken on receipt of 'flood alert, flood warning, severe flood warning, in the event of a breach', and receipt of 'no longer in force'. There is also no information on what action will be taken on receipt of a severe weather warning for 'rain/thunderstorm/snow', all of which could lead to flooding (surface water). There is reference to a contractors Emergency Response Plan (ERP), where it is anticipated that some of our previous comments may be answered, but it is unclear when TDC will have sight of this plan including any opportunity to provide feedback. There is also a reference to a contractors flood warning and evacuation plan, however it is unclear when TDC will have an opportunity to review this document.</p> <p>Section 6 Emergency Response Procedures (ERP) and Contacts: Again the ERP is mentioned, but no clarity of position on when TDC will be able to review and provide feedback on this plan. The principal contractor should also liaise with the District Council Emergency Planning team, not just the "blue light" services. It is unclear as to whether the Emergency Response Procedures and Contacts includes HM Coastguard as one of their blue light services. There is reference to an UXO plan, but no clarity of position on when TDC will be able to review and provide feedback on this plan.</p> <p>The Councils have conveyed the above to the applicant and expect that the CoCP will be updated to address the above concerns.</p>