

Offshore Wind Farm

ENVIRONMENTAL STATEMENT

Appendix 27.4 Traffic and Transport Consultation

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Glossary of Acronyms

AADT	Annual Average Daily Traffic
AAWT	Annual Average Weekday Traffic
AIL	Abnormal Indivisible Load
ATC	Automatic Traffic Count
DCO	Development Consent Order
DMRB	Design Manual for Roads and Bridges
EATM	Environmental Assessment of Traffic and Movement
EIA	Environmental Impact Assessment
ES	Environmental Statement
ETG	Expert Topic Group
HGV	Heavy Goods Vehicle
LCV	Light Commercial Vehicle
LV	Light Vehicle
OCTMP	Outline Construction Traffic Management Plan
PEIR	Preliminary Environmental Information Report
SRN	Strategic Road Network
TA	Transport Assessment
TEMPro	Trip End Model Presentation Programme
TTSA	Traffic and Transport Study Area
WCHAR	Walking, Cycling, and Horse Riding Assessment and Review

Glossary of Terminology

Haul road	The track along the onshore cable route used by construction traffic to access different sections of the onshore cable route.
Heavy Goods Vehicle (HGV)	HGV is the term for any vehicle with a Gross Weight over 3.5 tonnes. This is also used as a proxy for HGVs and buses / coaches recognising the similar size and environmental characteristics of the respective vehicle types.
Landfall	The location where the offshore export cables come ashore at Kirby Brook.
Light Vehicle (LV)	The term 'light vehicle' is used to describe the range of vehicles that would be used by construction employees, i.e. cars, vans, pick-ups, minibuses, etc.
Movement	A two-way trip (i.e. the arrival and departure from site) for the transfer of employees or goods.
National Grid connection point	The grid connection location for the Project. National Grid are proposing to construct new electrical infrastructure (a new substation) to allow the Project to connect to the grid, and this new infrastructure will be located at the National Grid connection point.
Onshore cable corridor(s)	Onshore corridor(s) considered at PEIR within which the onshore cable route, as assessed at ES, is located.
Onshore cable route	Onshore route within which the onshore export cables and associated infrastructure would be located.
Onshore substation	A compound containing electrical equipment required to transform and stabilise electricity generated by the Project so that it can be connected to the National Grid.
Onshore substation works area	Area within which all temporary and permanent works associated within the onshore substation are located, including onshore substation, construction compound, access, landscaping, drainage and earthworks.
Serious Collision	A collision resulting in serious injury for which a person is detained in hospital as an "in-patient", or any of the following injuries whether or not they are detained in hospital: fractures, concussion, internal injuries, crushing, burns (excluding friction burns), severe cuts, severe general shock requiring medical treatment and injuries causing death 30 or more days after the accident.
Slight Collision	A collision resulting in a slight injury of a minor character such as a sprain (including neck whiplash injury), bruise or cut which are not judged to be severe, or slight shock requiring roadside attention. This definition includes injuries not requiring medical treatment.
The Applicant	North Falls Offshore Wind Farm Limited (NFOW).
The Project Or 'North Falls'	North Falls Offshore Wind Farm, including all onshore and offshore infrastructure.
Traffic and Transport Study Area (TTSA)	Area where potential impacts from the Project could occur, as defined for each individual EIA topic.
Vehicle (HGV, Traffic) trips	A two-way trip (i.e. the arrival and departure from site) for the transfer of employees or goods.

1 Introduction

- 1. This appendix provides a full account of consultation received to date in relation to traffic and transport and sets out how the feedback has been addressed within the assessment of traffic and transport effects.
- 2. Consultation with regard to traffic and transport has been undertaken in line with the general process described in ES Chapter 6 EIA Methodology (Document Reference: 3.1.8). The key elements to date have included scoping and the ongoing technical consultation via the traffic and transport Expert Topic Group (ETG) meetings with the relevant highway authorities (Essex County Council and National Highways). The feedback received has been considered in preparing the ES. Table 1.1 provides a summary of how the consultation responses received to date have influenced the approach that has been taken.
- 3. Environmental Statement (ES) Chapter 27 Traffic and Transport (Document Reference: 3.1.29) has been updated following the consultation on the PEIR in order to produce the final assessment. Full details of the consultation process are presented in the Consultation Report (Document Reference: 4.1) as part of the DCO application.

Table 1.1 Consultation responses

Consultee	Date / Document	Summary of Comment	Response / where addressed in the ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) of the ES
Essex County Council	19/08/2021 Scoping Opinion	It is noted however that a number of key topics, not least as they relate to the statutory function of [Essex County Council] ECC including Highways and Transportation, and Economy and Skills have not been the subject of prior engagement. For example, ECC does not know how many vehicles will be needed to implement the proposal, what routes will be taken across what is essentially a restricted rural highway network to the coast. Hence it has meant it is difficult to consider the true impacts of the scheme across the board and to consider matters which have to be implemented to ensure the scheme can be delivered affectively, and any adverse impact can be mitigated.	Essex County Council's comments reflect the early stage of the Project's development. Following the submission of the Scoping Report, the Applicant has undertaken further consultation with Essex County Council and provided clarification on transport matters. This has included the submission of a Traffic and Transport Method Statement, Access Strategy Note and ETG meetings (summarised further within this table (Table 1.1)). Details of forecast traffic flows and routes are provided within Table 27.16 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29).
		there is scant detail on the highway's implications of this development both on its own and in combination with other proposals which will be taking place at the same time. ECC look forward to engaging with other Authority partners and the applicants on this.	Section 27.8 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) includes details of the cumulative effects with other developments.
		Essex County Council requested that the assessment of highway safety effects should include an assessment of construction traffic using narrow rural roads and the impact upon users of PRoW.	Section 27.4.3 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) outlines that no links are considered to be of constrained width. Section 27.6.1.4 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) includes an assessment of the effects of North Falls construction traffic upon Highway Safety of all road users
		Essex County Council requested that the assessment of Severance and Amenity effects should also consider the impact upon non-motorised users of the public highway including PRoW.	(including those of Public Rights of Way (PRoW)). Section 27.6.1 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) includes an assessment of the effects of North Falls construction traffic upon severance and amenity of all road users (including those of PRoW, as identified in Table 27.13 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29)).
		Essex County Council advised of sections of the Design Manual for Roads Bridges (DMRB) that may be relevant to the assessment.	Section 27.4.1 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) outlines the salient legislation, policy and guidance that have been utilised.

Consultee	Date / Document	Summary of Comment	Response / where addressed in the ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) of the ES
		Essex County Council provided details of data sources which show Public Rights of Way and National Cycle Routes.	Table 27.6 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) outlines the available sources of data that have been used to categorise the sensitive receptors within the Traffic and Transport Study Area (TTSA).
		Essex County Council provided detailed comments in in relation to PRoW.	Potential effects upon PRoW are assessed within ES Chapter 32 Tourism Recreation (Document Reference: 3.1.34).
		Essex County Council advised that further discussion would need to take place to agree the scope and content of the Transport Assessment (TA) to accompany the Environmental Impact Assessment (EIA).	Following the submission of the Scoping Report, the Applicant has undertaken further consultation with Essex County Council. This has included the submission of a Traffic and Transport Method Statement, Access Strategy Note and ETG meetings (summarised further within this table (Table 1.1)). A TA is provided as ES Appendix 27.1 (Document Reference: 3.3.64).
Planning Inspectorate	26/08/2021 Scoping Opinion	The ES should provide a robust justification as to how study areas have been defined and why the defined study areas are appropriate for assessing potential impacts.	Section 27.3.1 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) provides details of how the TTSA has been derived in consultation with the relevant highway authorities.
	Cooping Opinion	The Inspectorate notes specific receptors should be identified within the ES, alongside categorisation of their sensitivity and value.	Section 27.4.3.2.1 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) provides details of how traffic and transport receptors have been identified and their sensitivity and value categorised.
		The ES should include details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.	Section 27.4.6 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) outlines the salient assumptions that underpin the ES and limitations.
		The ES should include reference specific planning policy and legislation, where this has been used to inform the methodology used for assessment.	Section 27.4.1 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) outlines the salient legislation, policy and guidance that have been utilised.
		Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should also address how any mitigation proposed is secured, with reference to specific DCO requirements or other legally binding agreements.	Section 27.3.3 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) describes the mitigation measures that have been embedded into the design of the Project. Section 27.6.1 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) outlines the additional mitigation measures to be applied to manage the potential for significant effects during the construction of the Project.

Consultee	Date / Document	Summary of Comment	Response / where addressed in the ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) of the ES
		The Inspectorate considers that there is potential for likely significant traffic and transport effects to occur during operation, maintenance, construction and decommissioning of the project. The Inspectorate does not agree to scope these matters out of the ES. The Inspectorate advises that where the final selection of port(s) has not been determined at the time of any DCO submission, an assessment should be presented in the ES on the basis of parameters that establish the maximum significant adverse effects.	The preferred base port (or ports) for the offshore construction, operation and decommissioning of the Project is not known and any decision would not be expected until post-consent. Such facilities would be existing or would be provided or brought into operation by means of one or more planning applications or as port operations with permitted development rights. It has therefore been agreed with National Highways (at a meeting on the 7 June 2022) and Essex County Council (at a meeting on the 9 July 2021) to scope out of the assessment the onshore impacts of traffic and transport associated with offshore construction, operation and decommissioning activities. This approach has also been accepted by the Planning
			Inspectorate for other recently consented offshore wind farm projects, e.g. Norfolk Vanguard and Boreas, East Anglia Two, East Anglia One North and Hornsea Four.
		The Inspectorate agrees that significant effects are unlikely to occur during the operational phase of the onshore infrastructure and assessment of these matters can be scoped out of the ES. The Inspectorate however notes that the ES should clarify the anticipated number and routeing of road vehicle movements during the operational phase.	Section 27.6.2 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) includes details of the likely levels of operational traffic. The TA (ES Appendix 27.1 (Document Reference: 3.3.64)) includes details of the proposed access strategy for the operational phase.
		Paras 662 and 663 Rail network. The Scoping Report states that there is a branch of the East Coast Main Line (ECML) railway within the onshore scoping area, as well as a number of rail stations. No information is presented as to whether the Proposed Development may result in impacts to the operation of the rail network. The ES should include an assessment of the potential impact on the rail network, including the potential impacts of any construction or diversion activities on public transport, where significant effects are likely to occur.	Section 27.6 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) contains an assessment of the potential effects on the transport network associated with North Falls. No effects upon other transport services or infrastructure are anticipated.

Consultee	Date / Document	Summary of Comment	Response / where addressed in the ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) of the ES
		Abnormal indivisible loads (AIL). The Inspectorate notes from information in Table 3.30 that an assessment of the suitability of access routes to accommodate abnormal loads will be undertaken. This assessment should consider the worst case number of abnormal loads and types of vehicles required. The outcome of this assessment should be reported in the ES, together with confirmation of any measures required to mitigate significant adverse effects arising from this matter, including consideration of delays to emergency services. If mitigation is required, it should be clear how this will be secured in the DCO. The Applicant should also consider whether use of existing river and rail connections for the transport of abnormal loads could represent an environmentally better outcome than road transport.	Section 27.4.3.1 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) contains details of the approach to the assessment of abnormal loads.
		Hazardous loads. The Scoping Report does not present any information about hazardous loads and whether there is potential for these to be required as part of the construction, operation or decommissioning of the Proposed Development. This should be clarified within the ES, and where there is potential for hazardous loads that could give rise to significant effects, an assessment should be undertaken and presented in the ES accordingly.	With the exception of potential fuel deliveries (for temporary generators) no hazardous loads are anticipated for the North Falls. Section 27.6.1.4 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) provides a detailed assessment of the highway safety baseline and identifies no significant issues in relation to the movement of Heavy Goods Vehicle (HGVs). Noting this and that the transportation of fuel is strictly controlled by existing legislation (Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations (Department for Transport, 2009)) no further assessment of hazardous loads is presented.
		Mitigation. The Scoping Report does not reference any potential mitigation that might be required to manage traffic and transport impacts during construction, eg a construction traffic management plan (CTMP) or PRoW management plan. The Inspectorate would expect drafts of these documents to be provided within any DCO submission, together with confirmation of how they would be secured through the DCO.	An Outline Construction Traffic Management Plan (OCTMP) (Document Reference: 7.16) is submitted with the DCO application. The OCTMP will include outline travel plan measures, which would be developed further in consultation with Essex County Council and National Highways prior to the commencement of the authorised Project.

Consultee	Date / Document	Summary of Comment	Response / where addressed in the ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) of the ES
Essex County Council	9 July 2021 ETG Meeting 1	 An initial meeting held with Essex County Council to discuss: The extents of the TTSA; Data collection; Impacts to be assessed and the assessment methodology; and Proposed DCO documents. Agreements were reached with regard to: Approach to capturing baseline traffic flows; The approach to scoping out the assessment of operational traffic and transport impacts; The approach to scoping out the assessment of onshore traffic movements associated with the offshore construction and operational phases; The impacts to be assessed within the EIA; The approach to the assessment of highway safety; The proposed DCO documents; The Traffic and Transport EIA Chapter should be supported by a separate TA; and The design of new accesses and crossings. 	The approach to data gathering is outlined within Section 27.4.2 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) and the accompanying TA (ES Appendix 27.1 (Document Reference: 3.3.64)). The assessment methodology and agreed impacts to be assessed are outlined within Section 27.4 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29). A TA (ES Appendix 27.1 (Document Reference: 3.3.64)) is provided in support of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29). The TA includes details of the proposed access strategy and approach to the design of new accesses and crossings.
Essex County Council	5 May 2022 ETG Meeting 2	A second ETG meeting was held with Essex County Council to discuss the proposed strategy to access the project during the construction phase. Agreements were reached with regards to the routeing of HGVs to some accesses.	A TA is provided as ES Appendix 27.1 (Document Reference: 3.3.64) of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29). The TA includes details of the proposed access strategy and outline designs of the new accesses and crossings.
National Highways	7 June 2022 Traffic and Transport Meeting	A meeting was held with National Highways to discuss: The potential to access from the A120; The extent of the TTSA; Approach to data collection; Impacts to be assessed; Proposed DCO documents. Agreements were reached with regard to: The approach to capturing baseline traffic flows; The approach to considering seasonality of baseline traffic;	The approach to data gathering is outlined within Section 27.4.2 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) and the accompanying TA (Appendix 27.1 (Document Reference: 3.3.64)). The assessment methodology and agreed impacts to be assessed are outlined within Section 27.4 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29).

Consultee	Date / Document	Summary of Comment	Response / where addressed in the ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) of the ES
		 The approach to scoping out the assessment of operational traffic and transport impacts; The approach to scoping out the assessment of onshore traffic movements associated with the offshore construction and operational phases; The impacts to be assessed within the EIA; The approach to the assessment of highway safety; The proposed DCO documents; The Traffic and Transport EIA Chapter should be supported by a separate TA; and The design of new accesses and crossings. 	A TA is provided as ES Appendix 27.1 (Document Reference: 3.3.64). The TA includes details of the proposed access strategy and outline designs of the new accesses and crossings.
National Highways	8 November 2022. Email	In response to consultation with National Highways upon a range of access options in the vicinity of the A120. National Highways advised that they wish to avoid any new access to the A120 and would prefer access to the project to be taken from the local highway network. National Highways also advised that where the projects cables cross the A120, they would prefer that the project uses 'thrust bore' to install the cables under the carriageway, or to cross over at a suitable height.	A TA is provided as ES Appendix 27.1 (Document Reference: 3.3.64). The TA includes details of the proposed access strategy. No access is proposed from the A120. Section 27.3.3 of the ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) describes the mitigation measures that have been embedded into the design of the Project. These measures include a commitment to install the Project's cables under the A120 using trenchless techniques.
Zoe Fairley (Ardleigh and Little Bromley District Councillor and affected landowner)	10 July 2023. Statutory Consultation Feedback	The traffic impact your documents indicate is completely unacceptable and will impact unacceptably on Little Bromley for road use by walkers, cyclists, horse riders and drivers alike. The level of traffic you estimate will work to sever Little Bromley from being able to use Bentley Road or to access the A120 safely at the Bentley Road/A120 junction for example. The cumulative traffic impact of all construction projects for sub stations and connections has not yet been assessed. I also understand the highway substructure is not designed for the weight or quantity of traffic movements you estimate. What conversations are being had with ECC Highways on traffic impact across the District and what will be the cumulative effect of all developments together on road use and road structure? This seriously impacts village amenity. What are your plans to mitigate this impact? Also what are your mitigation plans for any route impacts due to construction?	Table 27.2 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) includes details of an extensive package of mitigation measures to address comments in regard to the effects of construction traffic upon the users of Bentley Road. Section 27.6.1 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) provides an assessment of the impacts of the Projects construction traffic upon severance and amenity. Section 27.8 of the ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) includes a detailed assessment the potential for cumulative effects. An OCTMP (Document Reference: 7.16) is submitted with the DCO application. The OCTMP includes details of the approach to managing the highway condition.

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UK Health Security Agency	14 July 2023. Consultation Response Letter	We note the use of the Guidelines for the Environmental Assessment of Road Traffic (GEART) and welcome the ongoing discussions within the traffic and transport ETG meetings. The assessment uses GEART to screen and allocate sensitivity for the 42 separate highway sections known as links. This is reported within Table 27.17 Link screening. Link ID 5 reports a concentration of sensitive receptors along the link including residential properties, a public house and a shop. The link is also crossed by PRoW and has limited separation from traffic which is provided with a narrow footway only along some of the link. Route ID 5 is therefore assessed as having high sensitivity and reports a 12% increase in all vehicles' peak movements. GEART requires sensitive links that are showing greater than 10% increase in total traffic flows (or HGV component) should be screened in, yet Table 27.17 does not include this link for further assessment. Recommendation. The screening for Link 5 should be reviewed and further assessment completed in accordance with GEART	Table 27.16 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) identifies that Link 5 would experience a changes in traffic flows below Environmental Assessment of Traffic and Movement (EATM) screening thresholds. In accordance with EATM the link is therefore screened out of the assessment.
Tendring District Council	13 July 2023. Consultation Response Letter	With regard to the location of the proposed substations, Tendring District Council is still concerned about the potential land-take and height of these structures. The poor road access, via narrow country lanes will be irreversibly damaged during the construction process and will cause significant disturbance to a rural community where the road infrastructure is not designed to accommodate such activity. These concerns are magnified by the fact that the clustered option means two other substations, including the 400kV Norwich to Tilbury substation might also be located within close proximity – completely transforming the character and enjoyment of this relatively untouched part of Tendring's rural heartland. If the Council's objections to the scheme are ultimately unsuccessful, TDC insists on there being meaningful dialogue with the promoter – North Falls, to consider a Community Benefit Contribution package for the legacy of the project. There are several community projects that would benefit from funding. A priority for TDC will involve seeking reinforcements to the sea defences and the cycle routes for the affected areas. There are	Section 27.3.3 of the ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) outlines a package of embedded mitigation measures to reduce the impact of the Project's construction traffic to the onshore substation upon the most sensitive communities and to minimise travelling via narrow roads, including: • A temporary haul road from Bentley Road to the onshore substation, facilitated by new temporary crossings of narrow roads; • Widening of the junction of Bentley Road and the A120; • Widening of Bentley Road; and • Provision of a new temporary footway/cycleway along Bentley Road. Section 27.6 of the ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) outlines that with this package of

Consultee	Date / Document	Summary of Comment	Response / where addressed in the ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) of the ES
		also potential opportunities arising from the construction of servicing haul roads in affected areas – particularly in locations where such routes could be utilised and/or formalised to provide permanent highway re-enforcements – such as link roads or bypasses that could resolve long-standing traffic issues (for example congestion in Thorpe le Soken village). This would require further consultation with both TDC and Essex County Highways.	embedded mitigation measures there would be no significant residual traffic and transport effects.
Tendring District Council	6 July 2023. Consultation Response Letter	Tendering District Council have submitted comments to North Falls from consultation with residents and Councillors. The following comments are considered to be relevant to traffic and transport: Stones Green Road off the B1035 is part of the National Sustrans Cycle Network The Council request the B1035 is not used as an alternate route for traffic at any time.	Section 27.3.3 of the ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) outlines a package of embedded mitigation measures to reduce the effects of the Project's construction traffic upon the most sensitive communities and to minimise travelling via narrow roads. In particular this includes the use of a temporary haul road and vehicular crossovers to remove the requirement for any traffic to access from Stones Green Road and to reduce the number of HGV movements past sensitive communities located along the B1035, e.g. Tendring Green and Tendring.
Suffolk County Council	14 July 2023. Consultation Response Letter.	The County Council expects traffic and transport impacts to be fully assessed and mitigated, for Suffolk especially in regard to any potential construction traffic impacts on Suffolk's rural road network and the limited options for suitable HGV and Abnormal Intervisible Loads (AIL) routes once the East Anglia Green route alignment has been chosen. The County Council will need to be satisfied that there will be no disruption or delays cause by the project on the A12 or wider strategic right network which may then have an impact on	Section 27.3.1 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) details the extents of the TTSA as agreed with the relevant highway authorities. It can be noted that no links extend into the administration area of Suffolk County Council. Section 27.3.1 of the ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) further outlines that routes that extend outside of the TTSA are where construction traffic has dissipated and therefore, significant effects upon users of the highway network are unlikely.
		businesses in Suffolk. There should be an Outline Port Construction Management Plan provided to manage traffic impacts that arise at any port as a result of the offshore elements of the proposal.	The preferred base port (or ports) for the offshore construction, operation and decommissioning of the Project is not known and any decision would not be expected until post-consent. Such facilities would be existing or would be provided or brought into operation by means of one or more planning applications or as port operations with permitted development rights. It has therefore been agreed with National Highways (at a meeting on the 7 June 2022) and Essex County Council (at a meeting on the 9 July 2021) to

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			scope out of the assessment the onshore impacts of traffic and transport associated with offshore construction, operation and decommissioning activities.
			This approach has also been accepted by the Planning Inspectorate for other recently consented offshore wind farm projects, e.g. Norfolk Vanguard and Boreas, East Anglia Two, East Anglia One North and Hornsea Four.
		Decommissioning and removal routes also need careful consideration.	Section 27.6.3 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) includes details of the decommissioning assessment.
National Highways (AECOM)	7 July 2023. Consultation Response	AECOM on behalf of National Highways, provided comments on the Projects PEIR. These comments are detailed below.	National Highway's comments reflect the stage of the Project's development. Following the submission of the PEIR, the Applicant has undertaken further consultation with National Highways and provided clarification on transport matters. This has included multiple ETG meetings (summarised further within this table (Table 1.1)).
		The transport study area should include the full section of the A120 from A12 Junction 29 to Harwich, including A12 Junction 29.	The boundaries of the TTSA have been extended to include the A120 and A120/A12 junction. Section 27.3.1 of the ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) details the extents of the TTSA and that the TTSA has been agreed with National Highways on 5 September 2023 (summarised further within this table (Table 1.1)).
		Clarification should be provided to confirm that the junctions between links on the SRN [Strategic Road Network] (including all A120 junctions and A12 Junction 29) are included as part of the study area.	The Applicant has discussed this matter with National Highways at an ETYG meeting (5 September 2023) and where it was confirmed that all junctions are included in the TTSA.
		Detailed drawings of proposed construction accesses AC12a, AC12b, AC13 and AC14 should be provided to National Highways for review to determine whether the proximity of these accesses to the A120 will impact the SRN.	The Applicant has discussed this matter with National Highways at an ETG meeting (5 September 2023) (summarised further within this table (Table 1.1)). During this meeting it was confirmed that National Highways were content with the location of the proposed accesses and there would not be an interaction with the Strategic Road Network (SRN).

Consultee	Date / Document	Summary of Comment	Response / where addressed in the ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) of the ES
		Any further details relating to the mitigation measures of relevance to the SRN (i.e. a OCTMP, details on delivery time restrictions, and a HGV access strategy) should be provided to National Highways for review as and when they are prepared.	An OCTMP (Document Reference: 7.16) is submitted with the DCO application. The OCTMP includes details of mitigation measures, delivery time restrictions and the access strategy. The OCTMP would be developed further in consultation with Essex County Council and National Highways prior to the commencement of the Project.
		Confirmation should be provided of the suitability of the SRN construction access junctions (A120/ B1035 Clacton Road, A120/ Bentley Road and A120/ Colchester Road) to accommodate the physical swept paths of the types of vehicles envisaged, without over-running kerb lines and/or adjacent traffic lanes. This should be provided in the form of swept path analysis drawings.	The TA (ES Appendix 27.1 (Document Reference: 3.3.64)) includes copies of swept path analysis drawings showing vehicles travelling between the A120 and Bentley Road and the A120 and B1035. No HGV traffic is forecast to travel between the A120 and Colchester Road.
		With regard to traffic counts, a validation exercise is required given that National Highways guidance at the time of data collection in June 2022 required that the effect of Covid-19 is screened from traffic survey results.	The Applicant has discussed this matter with National Highways at an ETG meeting (5 September 2023) (summarised further within this table (Table 1.1)). During this meeting it was agreed the approach to data collection was acceptable. The approach to data
		Manual classified turning counts should be undertaken at key A120 junctions. These should be scoped with ECC and NH, prior to being collected and presented within the Traffic and Transport ES Chapter and TA.	gathering is outlined within Section 24.5.2 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) and the accompanying TA (ES Appendix 27.1 (Document Reference: 3.3.64)).
		Justification for excluding the assessment of the traffic impact from the construction period of the offshore elements of the development should be provided, or the traffic impact of the construction of the offshore elements of the development should also be assessed.	The preferred base port (or ports) for the offshore construction, operation and decommissioning of the Project is not known and any decision would not be expected until post-consent. Such facilities would be existing or would be provided or brought into operation by means of one or more planning applications or as port operations with permitted development rights. It has therefore been agreed with National Highways (at a meeting on the 7 June 2022) and Essex County Council (at a meeting on the 9 July 2021) to scope out of the assessment the onshore impacts of traffic and transport associated with offshore construction, operation and decommissioning activities.
			This approach has also been accepted by the Planning Inspectorate for other recently consented offshore wind farm

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			projects, e.g. Norfolk Vanguard and Boreas, East Anglia Two, East Anglia One North and Hornsea Four.
		Driver delay assessment should be re-considered for the A120 portions of the study area due to the high sensitivity to such delay.	The Applicant has discussed this matter with National Highways at an ETG meeting (05 September 2023) summarised further within this table (Table 1.1). During this meeting it was confirmed that National Highways do not require capacity assessments. Further details are provided within Section 27.4.3 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29).
		The TEMPro growth factors should be provided for both the AM and PM peak periods. Further clarification regarding the parameters used to obtain the growth factors should be provided, such as the geography and the road type.	The TA (ES Appendix 27.1 (Document Reference: 3.3.64)) includes details of the approach to forecasting future traffic flows using growth factors from the Department for Transport Trip End Model Presentation Programme software (known as TEMPro).
		National Highways should take an ongoing role as a consultee regarding any potential measures, including within an OCTMP, that could have an impact on the use of the SRN.	An OCTMP (Document Reference: 7.16) is submitted with the DCO application. The OCTMP is secured by DCO requirement, which requires that National Highways be consulted on the final CTMP prior to the commencement of the Project.
		The consented container terminal development at Bathside Bay should be included as a committed development in the study, or justification for excluding it should be provided.	Table 27.38 of the ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) considers the potential for cumulative effects with the Bathside Bay Container Terminal (BBCT) and concludes that there is no potential for cumulative effects to occur between BBCT and North Falls.
		The significant increases in HGV flows on the A120, for the cumulative scenario, of up to 70%, merit further consideration and assessment in more detail at ES stage.	This matter was discussed with National Highways at an ETG meeting on the 5 September 2023 (summarised further within this Table 1.1). National Highways agreed to provide further explanation in regard to this comment if they considered further assessment (beyond that presented at PEIR) would be required. No further comments have been provided by National Highways.

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		Turning movements for each SRN junction in the study area should be provided in order to determine where junction capacity assessments are required on the SRN, unless further justification is provided for not doing so. For example, details of individual turning movements at the junctions concerned. This should be undertaken for all SRN junctions in the study area, including A12 Junction 29.	The Applicant has discussed this matter with National Highways at an ETG meeting (05 September 2023) summarised further within this table (Table 1.1). During this meeting it was confirmed that National Highways do not require capacity assessments. The supporting TA (ES Appendix 27.1 (Document Reference: 3.3.64)) provides details of hourly traffic flows in support of this agreed
		The maximum peak hour trip generation for the SRN should be provided for both the AM and PM peak.	approach. Further details are provided within Section 27.4.3 of the ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29).
		The figures within the table for distribution of local accommodation should be revisited and evidenced.	
		Where possible, a collaborative approach with the Five Estuaries Offshore Wind Farm project should be undertaken to reduce any impacts on the SRN.	Noted.
		Reference should be made to the latest DfT Circular 01/2022, and also to Highway's England (now National Highways) 'The SRN Planning for the future (A guide to working with Highways England on planning matters.'	Section 27.4.1 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) includes a review of all legislation, policy and guidance applicable to the Project (including DfT Circular 01/2022).
		Clarification should be provided regarding the reasoning for only including 12 months of the construction programme in the highway assessment, when the construction period is stated to be 18-24 months in the PEIR.	The TA (ES Appendix 27.1 (Document Reference: 3.3.64)) includes details of derivation of construction traffic demand for entire construction duration.
		An Abnormal and Indivisible Load report should be provided to National Highways for review.	An AlL study is provided as ES Appendix 27.2 (Document Reference: 3.3.65).
			It can be noted from ES Appendix 27.2 (Document Reference: 3.3.65) that National Highways have provided agreement in principle to this proposed route.
		The five year period for collision analysis should exclude periods of COVID-19 restrictions, specifically the period between 1st March 2020 and 31st August 2021.	The Applicant have discussed this matter with National Highways at an ETG meeting (05 September 2023) summarised further within this table (Table 1.1). During this meeting a revised approach to the collection of collision data (from that previously agreed with National Highways) was agreed. The approach to data gathering is outlined within Section 27.4.2 of ES Chapter 27 Traffic and

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			Transport (Document Reference: 3.1.29) and the accompanying TA (ES Appendix 27.1 (Document Reference: 3.3.64)).
		Sustainable travel measures should be explored and included within the OCTMP, such as promoting car sharing or the provision of staff minibuses.	Table 27.1 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) outlines that the traffic forecasts presented within this chapter have applied an employee to vehicle ratio (carshare) of 1.5 persons per vehicle.
			An OCTMP (Document Reference: 7.16) is submitted with the DCO application. The OCTMP includes outline travel plan measures, which would be developed further in consultation with Essex County Council and National Highways prior to the commencement of the Project.
		Within the distribution exercise, the proportion of traffic arriving from the A12 north of Junction 29 or west of Junction 29 should be defined, given the difference in potential final route to the site.	The TA (ES Appendix 27.1 (Document Reference: 3.3.64)) includes further details of distribution of traffic at Junction 29 in the form of turning count diagrams.
		Data sources in relation to accommodation per postcode should be stated and the percentage split between local and non-local workers should also be set out.	The Applicant have discussed this matter with National Highways at an ETG meeting (05 September 2023) summarised further within this table (Table 1.1). National Highways agreed that they would defer agreement of the approach to Essex County Council. The Applicant and Essex County Council have subsequently agreed an approach to the distribution of employee traffic. The agreed approach is detailed in the TA (ES Appendix 27.1 (Document Reference: 3.3.64)) includes further details of distribution of employee traffic.
Essex County Council	14 July 2023. Consultation Response Letter.	Essex County Council have provided comments on the Projects PEIR. These comments are detailed below.	Essex County Council's comments reflect the stage of the Project's development. Following the submission of the PEIR, the Applicant has undertaken further consultation with Essex County Council and provided clarification on transport matters. This has included multiple ETG meetings (summarised further within this table (Table 1.1)).
		It is also noted that whilst the landward development rests in Essex, the socio-economic and highway impacts of that inshore	Section 27.3.1 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) details the extents of the TTSA and that the

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		development are more widely spread and will also affect the local road network and communities within the wider region.	TTSA has been agreed with Essex County Council at a meeting on 5 September 2023.
		North Falls Offshore (NF) Traffic flows and vehicle speeds were obtained for 24 hours a day for seven days between the 9 June 2022 and 15 June 2022. NF state that previous traffic flows were obtained for 2019 and more recent 2020 data which were discounted due to the impact from the pandemic. It is currently estimated that the earliest date that construction could commence would be 2026. To consider a worst-case scenario, a reference year for background traffic of 2026 has been derived. ECC normally require traffic to be assessed based on application year and 5 years post application, however, this is not a permanent site, so this will be acceptable.	Noted. The TA (ES Appendix 27.1 (Document Reference: 3.3.64)) includes further details of the approach to deriving baseline traffic flows.
		The use of TEMPro 7.2 is acceptable, however, Dataset af15 has been used, which has been superseded by RTF018. It appears that average weekday and average day growth factors have been provided for the whole of Essex. This scheme is in Tendring so the Tendring district growth factors would be more specific or an average of the MSOA areas that the scheme is to be located. ECC also look at the peak hour derived from traffic counts, rather than average weekday or average day figures, to assess impact on the network. ECC have derived their own growth rates for the specified periods for Tendring and this results in lower growth from 2019 to 2022 but higher growth for 2022 to 2026 than that detailed in Appendix 27.1.2, Appendix 27.1.3 tabulates the application of the growth rate to the traffic counts for Average Daily traffic flows and Average weekday traffic flows. When looking at the peak hour, this growth should be based on AM and PM growth factors for the Tendring District.	The TA (ES Appendix 27.1 (Document Reference: 3.3.64)) includes details of the approach to forecasting these flows using growth factors from the Department for Transport TEMPro.
		No committed development in the area has been included, it may be necessary to assess the impact of specific sites if being constructed within the same time scale.	Section 27.8 of the ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) includes a detailed assessment of the potential for cumulative effects.
		There is detailed information provided in the TA and accompanying documents which clearly demonstrates how the indicative HGV and LGV trips have been derived for the North Falls construction. This	Noted. The TA (ES Appendix 27.1 (Document Reference: 3.3.64)) submitted with the DCO application continues to include details of

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		is results in a clear methodology to show how indicative trip generation figures have been arrived at.	how HGV and LGV trips have been derived for the construction of the Project.
		It should be noted that 'peak demand' as referred to in this document is the month in which there is peak demand for materials and employment. This is not peak demand in term[s] of network capacity assessment.	The Applicant has discussed this matter with Essex County Council at an ETG meeting (05 September 2023) summarised further within this table (Table 1.1). During this meeting it was confirmed that Essex County Council do not require capacity assessments.
		The HGV and LGV trips have not provided at in a format to assess the impact on the highway network and to determine the junctions affected. This only demonstrates the total number of movements generated by the site and the access point to which they are assigned. The information detailed for the trip generation for the construction is in a daily format. Annual average Daily traffic (AADT) flows should not be used to calculate daily flows as this is based on a 7-day average. Annual average weekday traffic (AAWT) flows based on a 5-day average, as presented in the document, can be used to calculate weekday flows.	Further details are provided within Section 27.4.3 of the ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29). Notwithstanding, the supporting TA (ES Appendix 27.1 (Document Reference: 3.3.64)) provides details of hourly traffic flows in support of this agreed approach.
		Peak network hours are not identified of either for the local road network or the site trip generation. Hours of operation for the site are not detailed in the document and there is no indication of peak network operation for the site.	
		All counts are link flows not junction counts, there are no junction counts. These link counts are traffic volumes but do not assess current network conditions. Therefore, no junctions have been assessed or the impact of the proposed flows on the routes identified. To understand existing network conditions and identify potential impacts caused by the development on the surrounding and wider road network is essential.	
		Identification of the proposed traffic-related study area including any key junctions on the existing road network that may be affected by traffic generated by the development. Consideration should be given to any deficiencies in the local highway network, existing access arrangements, existing road layout, existing carriageway widths, weight restrictions and existing speed limits.	

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		"Existing traffic flows into, out of, and around the site, and for the agreed junctions within the study area should be shown in traffic flow diagrams. All traffic surveys should be:	
		- Undertaken in neutral months during normal traffic flow and usage conditions	
		- In non-school holiday periods	
		- In typical weather conditions	
		- Based on data that is no more than three years old."	
		A description of the operation of the local network noting any junctions and links that experience congestion. Where junction modelling is to be undertaken, ECC recommends that junction models are validated against queue length observations to demonstrate their robustness. The methodology for the collection of queue length data should be agreed with ECC.	
		Daily profile of HGV trips and employee trip generation will be needed to assess impact on peak hour on corridors and junctions identified as being affected. There has been no comparison with actual flows and proposed trips to derive percentage impact on links for either daily flows or peak hours. HGV's have a considerably higher impact on capacity per vehicle than a car, this is why the increase in traffic modelling is assessed in PCU's.	
		There is no breakdown of the how the daily trips will be assigned to the network over the day.	
		The peak hours for the local network and the development operation in a minimum of hourly format should be provided to that is possible to see how the development traffic corresponds to the current network and peak hour. This could be demonstrated as staff shift times, of which there may be more than one e.g., early shift 7:00 to 16:00, main shift 8:00-17:00 etc. for both arrivals and departures. The same can be applied to construction traffic times. It is also possible that this may differ depending on the specific section of the site.	

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		Annex 27.1.12 Summary of HGV and LV assignment per link details in tabular format the average and peak flows per link based on 24HR AADT and 18Hr AAWT both for the construction peak and average. However, these trips should be based on the days and hours of operation of the site and not averaged over 24 hours or 18 hours for the purposes of assigning the indicative trips to a daily profile both for staff and construction traffic. This has not been presented on flow diagram format.	
		It should be noted that key links such as the A133 Main Road Frating and the B1027 St John's Road have not been identified in this document. These are important local corridors and routes both for gravel extraction sites e.g., TARS, Brett, Anglian and for key routes for staff from these areas. The A133 Main Road also forms the main diversion route for HGVs as an alternative route for the weak bridge on the B1027 at Alresford that has had a 7.5 tonne weight restriction introduced on it earlier this year.	The boundaries of the TTSA have been extended to include the A133 and B1027. Section 27.3.1 of the ES Chapter 27 Traffic and Transport (Document Reference: 3.3.64) details the extents of the TTSA and that the TTSA has been agreed with Essex County Council at a meeting on 5 September 2023.
		The existing capacity of the network has not been assessed or any key junctions. Capacity issues at Frating are important to understand due to the limited capacity on the non-dual section of the A133 between Frating and Weeley, the increases during holiday period that cause extensive queues back to the A120. This is important in terms of capacity and in respect of efficiency of construction traffic.	The Applicant has discussed this matter with Essex County Council at an ETG meeting (05 September 2023) summarised further within this table (Table 1.1). During this meeting it was confirmed that Essex County Council do not require capacity assessments. Further details are provided within section 27.4.3 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29). Notwithstanding, the supporting TA (ES Appendix 27.1 (Document Reference: 3.3.64)) provides details of hourly traffic flows in support of this agreed approach.
		Impact of transporting unusual loads and higher levels of HGV movements has not been detailed or how these would be accommodated on routes particularly via Clacton on the B1027 and B1032 or via Kirby Cross and Thorpe Le Soken.	Section 27.4.3.1 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) includes details of the approach to the consideration of abnormal loads.
		"Distribution methodology is not accepted by ECC. This is based on: To inform the potential distribution of construction employees for North Falls, the availability of local labour and rented	The Applicant has discussed this matter with Essex County Council at an ETG meeting (05 September 2023). The Applicant and Essex County Council have subsequently agreed an approach to the distribution of employee traffic. The agreed approach is detailed in

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		accommodation has been reviewed as part of the socio economics study to inform the potential employee distribution.	the TA (ES Appendix 27.1 (Document Reference: 3.3.64)) includes further details of distribution of employee traffic.
		The gravity model provided for distribution does not appear to be representative of the current patterns of employment that we would expect to see, there is a concern that this is not based on Census travel to work data that would normal data used. Distribution should be based on Census Journey to work to here from home. The site is located across several MSOA's Tendring including 003, 005, 007, 008. It is also likely that different areas may have different workforce catchments – with the north being more accessible directly from the A12, Horsley Cross from the A120 and the south directly from Clacton."	
		"Normally Census journey to work for the area in which the development is located is used to gain an understanding of where trips to the proposed development are to come from and go to. However, there are sites like this that may not fit with the normal process. It is also possible to use Census data from an alternative location that may be more appropriate for determining distribution patterns if the local area is not representative with local adjustment or a gravity model predicting origins based on population and proximity to the site or a hybrid methodology that combines approaches. Based on the information provided it is indicated that specific routes origins and destinations can be derived for the construction aspect. For the employment distribution this needs to be looked at in more detail in conjunction with the local MSOA data to capture the location specific characteristics combined with another dataset to represent the more strategic employment characteristics. Different parts of the site may be more accessible by public transport and sustainable modes than others, this should be	
		considered for employment." "Highways impact: Onshore substation access 16, vehicle routeing	Noted
		strategy: there are separate ongoing discussions regarding this	Noted

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		aspect of the project, and these are at an early stage and include National Grid, the Highway Authority and National Highways and this requires further work."	
		"Temporary Construction Accesses: For each temporary construction access joining the public highway it will be necessary to demonstrate that sufficient visibility would be provided within highway and/or land under the control of the applicant. The applicant will need to provide:	The TA (ES Appendix 27.1 (Document Reference: 3.3.64)) submitted with the DCO application includes details of the outline access designs (detailing visibility splays, measured speeds, highway boundary and signage) and copies of a Stage 1 Road Safety Audit.
		A scale drawing showing the full extent of the visibility splays proposed. The splays should be based on the posted speed limit or the 85th percentile vehicle speed ascertained from a speed survey. Extent of highway should be coloured (see item 3 below)	
		2. The results of a speed survey if one is conducted to establish the required visibility	
		3. The results of a formal extent of highway search (including the covering letter and/or email) as sourced from https://www.essexhighways.org/transport-and-roads/highwayschemes-and-developments/adoptions-and-land/highway-statusenquiries.aspx (any problems with online payment/filling in the form the applicant should email highway.status@essexhighways.org who process the requests)*	
		4. A stage 1 Road Safety Audit shall be provided for each access.5. Any temporary traffic management and/or temporary construction access signage on the approach shall be submitted on	
		a separate drawing."	
		"AIL: It is noted from information in Table 3.30 that anassessment of the suitability of access routes to accommodate abnormal loads will be undertaken. This assessment should consider the worst-case number of abnormal loads and types of vehicles required. The outcome of this assessment should be reported in the local Highway Authority (HA), together with confirmation of any measures required to mitigate significant adverse effects arising from these movements, it would be necessary pick up any structures along a designated route, possibly low structures/ routes with weight/ width restrictions in advance. The Applicant should	Section 27.4.3.1 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) includes details of the approach to the consideration of abnormal loads.

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		also explore alternative options to minimise the impact these movements will have on the local highway network. Ideally, these movements should be restricted to the Strategic Route network within the County's Route Hierarchy."	
		"Key Construction Routes: It is noted that in Chapter 27 Traffic and Transport report, any existing highway safety issues on designated construction routes will be discussed with Essex County Council to understand if, the HA have planned improvement works which may help to address inherent highway safety issues at key junctions, direct mitigation may be required in the form of a S278 Agreement or Minor Works Authorisation as a result of the significant uplift in vehicle movements as a result of this project at specific sites identified prior to commencement of these works."	Section 27.6.1.4 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) provides a detailed assessment of the highway safety effects of North Falls and also includes details of conversations with Essex County Council's Road Safety Team in regard to potential mitigation measures.
		"Minor Road Network: Under 27.8.3 Assessment of cumulative effects in the Traffic and Transport it is noted that there is a requirement to use Parsonage Lane and Wolves Hall Lane east of the B1035 (Tendring Green), Stones Green Road and Tendring Road (Tendring Green) plus Little Clacton Road these roads are not suitable to cater for a significant uplift in two-way vehicle movements, HGVs, in particular, as identified in the report. For example, Parsonage Lane is a narrow lane, no footways and is predominately a residential road serving several properties. Is there scope to use an internal haul road accessed via another temporary construction access point?	Following the publication of the PEIR access via these roads has been discounted. The supporting TA (ES Appendix 27.1 (Document Reference: 3.3.64)) provides details of proposed access strategy to avoid traffic travelling via these roads.
		The Highway Authority have not been able to undertake site visits of all roads that are proposed to access the works compounds and there are specific concerns regarding use of some minor routes. It is likely that if it is not possible to avoid use of the minor/rural road network by utilising internal haul roads then further mitigation should be investigated on roads where two HGVs cannot pass each by possible road widening or provision of passing bays."	
		Construction Management Plan: It is noted that this is referred to in Chapter 27 Traffic and Transport report. No construction work shall take place, including any ground works or demolition, until a Construction Management Plan has been submitted to, and approved in writing by, the local planning authority. The approved	An OCTMP (Document Reference: 7.16) is submitted with the DCO application. The OCTMP includes outline travel plan measures, which would be developed further in consultation with

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		plan shall be adhered to throughout the construction period. The Plan shall provide for but not restricted to: I. vehicle routing, II. the parking of vehicles of site operatives and visitors, III. loading and unloading of plant and materials, IV. storage of plant and materials used in constructing the development, V. wheel and underbody washing facilities. VI. Before and after condition survey to identify defects to highway in the vicinity of the access to the site and where necessary ensure repairs are undertaken at the developer expense when caused by developer.	Essex County Council and National Highways prior to the commencement of the Project.
		Workplace Travel Plan: It is noted that this is referred to in Chapter 27 Traffic and Transport report. Due to the scale of the project and prior to first occupation of the site, the applicant shall submit a workplace travel plan to the Local Planning Authority for approval in consultation with Essex County Council. Such approved travel plan shall be actively implemented for the duration of the project.	
		Whilst the DCO provides powers in respect of highway works the Highway Authority would wish all highway works to be delivered using its standard S278 Highways Act 1980 process and would seek early agreement from North Falls regarding this point. Additionally, the DCO provides powers regarding Streetworks and again the Highway Authority would wish to seek assurance that the Essex Permitting Scheme is used so that Essex County Council can properly manage North Falls proposed Streetworks in addition to that of other statutory undertakers/Highway Authority/developers, as well as Section 50 (Highways Act 1980) licences for private apparatus under the highway. It is noted that cumulative development has been addressed but will be subject to further assessment within the DCO submission. The Highway Authority obviously have concerns over similar offshore schemes occurring in the local area and every effort should be made for the schemes	The OCTMP (Document Reference: 7.16) outlines that all highway works would be delivered using a Section 278 agreement and Street Works would use the Essex Permitting Scheme (unless agreed otherwise with Essex County Council).

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		to work together to reduce impact and disruption to local communities.	
Ardleigh Parish Council	13 July 2023. Consultation Response Letter	There are particular concerns about the impact on the road and lane network in the areas around the new substations and of safety for all users but especially those on foot/ cycling or on horseback along the very narrow lanes, especially but not limited to lanes around the Burnt Heath area of Ardleigh which borders Litle Bromley and Great Bromley. Such concerns would be exacerbated if several substations were contiguously or closely located. If the existing lanes are used by construct traffic we struggle to see how mitigation could prevent a very significant and negaveti impact on local residents particularly those who use the lanes for leisure and could well be prevented from doing so if sharing with HGVs. In other words we fear a loss of village amenity. The North Falls development and associated facilities such as haul roads, temporary construction compounds and haul road access points will be highly disruptive to day-today community life. Quiet country roads and Public Rights of Way will be affected impacting residents, walkers, cyclists and horse riders. There are many farms which need access to their properties and fields at all times of year, and especially during harvest.	Section 27.6.1 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) presents an assessment of the effects of the Project on of severance, amenity, highway safety and driver delay. With the application of additional mitigation measures (as appropriate) the residual effects upon all receptors was assessed to be not significant in EIA terms, as shown in Table 27.42 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29).
Frinton and Walton Town Council	13 June 2023. Consultation Response E-mail	In addition to the feedback provided below, if the Minister is mindful of approving the National Grid East Anglia Green Proposal, our Members would like strong consideration given to making the proposed temporary road a permanent road, as this would aid congestion issues that have been long seen in the village of Thorpe le Soken but in having a permanent bypass road, the issues would be somewhat if not completely alleviated. Such disruption that this scheme would cause has to benefit our residents in some way	The haul road for North Falls is temporary and would be removed upon completion of construction.
Essex Fire and Rescue Service	July 2023. Consultation Response Letter	Consideration for road widths to be accessible whilst not impeding emergency service vehicle response through safe access routes for fire appliances including room to manoeuvre (such as turning circles).	ES Chapter 5 Project Description (Document Reference: 3.1.7) includes details in regard to the design of the Project's infrastructure.
		Access for Fire Service purposes must be considered in accordance with the Essex Act 1987 – Section 13, with new roads	

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		or surfaces compliant with the table below to withstand the standard 18 tonne fire appliances used by Essex County Fire and Rescue Service.	
		Implementation of a transport strategy to minimise the impact of construction and prevent an increase in the number of road traffic collisions. Any development should not negatively impact on the Service's ability to respond to an incident in the local area.	Section 27.6.1.4 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) includes a detailed assessment of the Project's construction traffic upon highway safety.
Suffolk and North East Essex ICB	14 July 2023. Consultation Response Letter.	It is clear from the PEIR that both the offshore and onshore construction works will result in road closures, diversions and substantial HGV traffic, all of which could severely impact on the ability of [East of England Ambulance Service Trust] EEAST, and other blue-light services, to respond to emergency or category 1 calls. Such situations could have a detrimental effect on patient health. 2. A full assessment, including mitigation measures, of the potential impact to EEAST is absent from the PEIR. Hence the ICB and EEAST are requesting that this be undertaken and included, in collaboration with appropriate representatives, as part of the ES and/or it forms a distinct part of the assessment on healthcare services referred to elsewhere in this response.	Noted. Detailed comments responded to below. Please also note that effects upon human health are considered within ES Chapter 28 Human Health (Document Reference: 3.1.30).
		On behalf of our client, East Suffolk and North Essex NHS Foundation Trust (ESNEFT), we write to provide our response to the North Falls Offshore Windfarm Project's Stage 2 Consultation. This letter comprises a review of, and comments on, the Preliminary Environmental Impact Report (May 2023) in respect of potential impacts arising from the proposed development on ESNEFT'S acute healthcare facilities and services.	Noted.
		Please note that the representations contained in this letter form part of an overall response from the Suffolk and North East Essex Integrated Care Board (ICB), which draws together comments from other healthcare providers on the likely impacts on their respective facilities and services arising from the proposed windfarm development. In response to the Stage 1 consultation, we note that Public Health England (PHE) identified a need to ensure that the ES provides further detail to the acknowledgement of the potential	

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		demand on healthcare services including Primary and Secondary Care (including mental health). In addition, we note that the North East Essex Clinical Commissioning Group (CCG) requested that a review of ambulance emergency and non-emergency patient transport services is undertaken, with particular regard to the influx of additional temporary residents.	
		ESNEFT has reviewed the Preliminary Environmental Impact Report (PEIR) published as part of the Stage 2 Consultation on the North Falls Offshore Windfarm Project and wishes to build on the previous consultation process and make the following comments.	
		The Trust welcomes this recognition that its services and facilities are likely to be affected by the project proposals and concurs that further work is required to ascertain the scope and scale of demand and the mitigation required to address the impacts.	Noted.
		This letter and Annexes provide the necessary 'project context' to assist the review of EEAST's specific concerns and should be read in conjunction with correspondence from its health and blue light partner organisations - incorporating Essex CC, Integrated Care Boards, Essex Police and Essex Fire & Rescue Service.	Noted.
		EEAST previously responded to the NFOWP (Non-Statutory) Stage 1 consultation on 9th December 2022 as part of the ICB response, and is pleased to update its position following review of the Preliminary Environmental Information Report (PEIR).	
		NFOWP would be located within two array areas to the west of the Galloper and Greater Gabbard Offshore Windfarms, approximately 22km off the East Anglian Coastline, occupying a seabed area of 150km2. Offshore and onshore cables would export power generated via off/on shore substations to the National Grid.	
		EEAST has reviewed the documentation on the NFOWP consultation portal and consider that the Project is likely to have a significant impact on its operations, service capacity and resources (i.e. staff, vehicle fleet and estate assets) requiring appropriate mitigation and management measures to be identified at an early stage, and secured and implemented either as DCO Requirements and/ or via a Planning Obligation or Deed of Covenant.	

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		 EEAST and its health and blue light partners therefore look forward to working with SSERWE, in order to; Determine the baseline service capacity position(s) Scope the likely type & extent of scheme impacts (effects) Identify an appropriate type(s) level & duration of mitigation & management measures, including communication & liaison procedures. This is necessary to ensure that EEAST can continue to meet its targets and deliver on its priorities as a key healthcare and emergency services provider. The relevant considerations from EEAST's perspective are summarised below The PEIR (Chapter 27 Traffic & Transport, Table 27.29) indicates 	The Applicant have made significant commitments to the use of
		that 8 x highway links are expected to incur highway network (driver) delay as a result of construction phase road closures for up to 6 weeks as follows; • Little Clacton Road –12-minute delay via alternative route • Ardleigh Road – 6-minute delay via alternative route • Swan Road – 5-minute delay via alternative route • Damant's Farm Lane – 3-minute delay via alternative route • Golden Lane – 3-minute delay via alternative route • Spratts Lane – 3-minute delay via alternative route • Barlon Road – 2-minute delay via alternative route • Wolves Hall Lane – 1-minute delay via alternative route. The methodology adopted by the PEIR indicates that the 'significance effect' of the delay on Little Clacton Road would be 'moderate adverse' with all other delays assessed as 'negligible'. Whilst this approach is designed to convey the severity of impact from an EIA perspective as assessed against the highway/ trip baseline, it would not be applicable to the effect upon EEAST's operations.	trenchless technology to ensure that the main roads remain open. Section 27.4.3.2.1 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) outlines that a total of 21 roads will be crossed by the Projects onshore cables and that of these roads, four minor roads could require a road closure with the remaining roads remaining open. Section 27.6.1.5 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) identifies that delays from road closures would be no greater than three minutes and this is assessed as negligible. The matter has further been discussed with EEAST at an ETG meeting on the 26 March 2024 and consequently the OCTMP (Document Reference: 7.16) also includes a commitment engaging with the emergency services and providing advanced notification of closures and diversion routes.

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		From EEAST's perspective, any form of network delay which leads to a Category 1 (life threatening) call mean arrival time of >7 minutes, could have a significant adverse impact on a patient health event outcome. It would also constitute a failure to achieve mandated National Quality Requirements leading to EEAST being issued with a Contract Performance Notice which could ultimately lead to a financial penalty being applied. Any road closure/ delay associated with the Project also increases the probability of any additional unforeseen delay (encountered on the network) triggering a cumulative 7-minute delay overall. Both these EEAST outcomes would be akin to a 'Major Adverse' effect in EIA terms, requiring avoidance and/or mitigation, as detailed below.	
		Similarly, the forecasted trip generation for construction phase impacts on the local road network in the vicinity of the NFOWP Project, is considered to be appreciable (and significant) from EEAST's perspective. 17 x links exceed the Guidelines for Environmental Assessment of Traffic (GEART) screening thresholds, with the following increases of particular note identified: • Link 4: Bentley Road from A120 to Little Bromley – 432 (1,457%) increase in HGV's per day • Link 17: Colchester Road south of the A120 – 62 (293%) increase in HGV's per day • Link 35: B1035 north of B1033 to Whitehall Lane – 62 (284%) increase in HGV's per day • Link 37: B1035 north of Whitehall Lane to Swan Road – 62 (284%) increase in HGV's per day. Whilst the EIA methodology assigns a 'negligible' (insignificant) effect to Links 4,17,35 and 37, the reduced network capacity (particularly if combined with a Project HGV breakdown or other incident) could contribute to a >7minute Category 1 Call mean arrival time - giving rise to a significant impact on EEAST's operations warranting mitigation.	The Traffic Management Act 2004 places a Network Management Duty on the highway authority to "manage their road network' in a way that secures 'the expeditious movement of traffic" Section 27.4.3 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) outlines an agreement with National Highways and Essex County Council in their role as Network Managers to ensure that the arrival and departure profile of North Falls traffic is managed, thereby ensuring the expeditious movement of all traffic (including emergency services). The matter has further been discussed with EEAST at an ETG meeting on the 26 March 2024 and consequently the Outline Code of Construction Practice (Document Reference: 7.13) also includes a commitment to establishing a line of communication with EEAST and providing updates and detail on the Project (as required) to allow them to plan and manage their activities.

Consultee	Date / Document	Summary of Comment	Response / where addressed in the ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) of the ES
		Construction Access & Haul Road Crossings The PEIR indicates that there would be 16 x construction accesses, along with 7 x Temporary Construction Compound locations requiring access to the road network. A banks person may be deployed to direct construction vehicles in and out of construction access points in association with other traffic management measures, as required. 22 x haul road crossings with entry/ exit points are also identified which would require safety measures to be employed such as: • Additional temporary signage to warn road users of heavy plant crossing the highway • Additional temporary traffic calming measures for highway users at the crossing point • Pedestrian arrangements at the crossing points • Road sweeping operations in the vicinity of the crossing points. The 16 x proposed construction access points and 22 x haul road crossings with the associated traffic management measures are likely to lead to highway network delays. EEAST's operational standards & thresholds, which include Contract Performance Notice penalties in association with specified delays, are set out for information in Annex 2. Artificial [Abnormal] Indivisible Loads (AIL) It is noted that the construction of the onshore substation would require transportation of components via Articulated [Abnormal] Indivisible Loads (AIL's) which are likely to lead to highway network delays, including the use of police escort facilities as necessary.	Section 27.4.3.1 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) includes details of the approach to the consideration of abnormal loads. The matter has further been discussed with EEAST at an ETG meeting on the 26 March 2024 and consequently the Outline Code
		The PEIR for the 5 Estuaries Windfarm Project forecasted 2-4 transformers on 20-24 axle frame trailers and 8-12 items of plant (such as shunt reactors) to be delivered by AIL's. Review of the NFOWP Traffic & Transport Chapter and TA within the PEIR does not, however, seem to identify AIL movements, and this area therefore ought to be assessed in the forthcoming ES.	of Construction Practice (CoCP) (Document Reference: 7.13) also includes a commitment to notifying EEAST of the timing and routeing of any abnormal load movements.

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		It is evident that a major level of onshore construction works incorporating cable corridors, trenchless crossings, new highway access points, works compounds, heavy construction plant road crossings and haul roads, requiring road closures, route diversions and related traffic management measures - along with significant HGV (and an unspecified number of additional AIL) traffic movements are envisaged. This would take place as part of the extensive 4-5 year construction phase program, required to implement the North Falls Offshore Windfarm Project. Information to determine the effects arising from the construction phase of the Project and likely impact on EEAST's operational capacity, efficiency and resources (including the likely highway disruption and delay) is currently absent from the PEIR documentation and its proposed mitigation and management measures. This information therefore needs to be presented and assessed, either as part of the ES or in accompanying documentation, with any necessary mitigation and management measures secured and implemented through DCO Requirements, and/ or via a Section 106 planning obligation or Deed of Obligation, as part of any Development Consent Order (DCO) approval.	Section 27.11 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) outlines that with the application of mitigation measures (as required) residual traffic and transport impacts upon all road users would not be significant. These mitigation measures are captured within the OCTMP (Document Reference: 7.16) which is secured by DCO Requirement. The Applicant therefore considers that a Section 106 planning obligation or Deed of Obligation is not required.
		Transport, Community Safety, Health & Wellbeing Working Group In the light of the above, EEAST recommend that appropriate Terms of Reference, Membership and a Communications Strategy for a Transport, Community Safety, Health and Wellbeing Working Group is established, as soon as practicable, and in advance of the Examination.	
		This would help to inform and assist the management of relevant aspects of the Project requiring a coordinated response from 'health and blue light partners', incorporating representatives from EEAST, NHS Suffolk & North East Essex ICB, East Suffolk North Essex Foundation Trust, Essex Partnership University Trust, Essex Police, Essex Fire & Rescue Service, Essex & Herts Air Ambulance and HM Coastguard.	

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		EEAST is an INTERESTED PARTY in this planning process, operating in close association with the Integrated Care Boards across the East of England, along with blue light partner organisations, such as Essex CC and Essex Police and Essex Fire & Rescue.	
		EEAST welcomes the opportunity to respond to the Stage 2 (statutory) consultation for the North Falls Windfarm Project, and following review of the PEIR documentation raises Points of Concern, due to its omission to address EEAST's principal areas of interest and concern outlined above.	
		EEAST considers that the Project is likely to have a significant impact on its operational capacity, efficiency and resources (incorporating its staff, vehicle fleet and estate assets) which have not been baselined or sufficiently assessed in the PEIR and associated documentation to date.	
		The Project is therefore considered to adversely affect EEAST's ability to meet and deliver its targets and priorities (statutory duties) as a key healthcare and emergency services provider.	
		Information including identified impacts arising from the development should therefore be presented and assessed, either as part of the ES or in accompanying documentation, with necessary mitigation and management measures secured and implemented through DCO Requirements, and/ or via a Section 106 planning obligation or Deed of Obligation, as part of any DCO approval.	
		It is recommended that an agreed approach is then reflected in a future Statement of Common Ground, to clarify the position reached and inform the Examination process.	
		The measures ought to include a process to assist EEAST and its health and blue light partners to plan for and implement co-ordinated responses to construction phase (and any operational and decommissioning phase) Scheme impacts and incidents arising, to optimise patient outcomes.	
		Early information exchange and liaison is therefore important to ensure an effective scheme design is developed, and robust EIA	

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		and related technical assessments are carried out, in order to inform the basis for mitigating and managing the impacts arising on EEAST and its health and blue light partners.	
		We trust this is of assistance and look forward to working with SSERWE in order to address the points raised.	
Little Bromley Parish Council	Consultation Response Letter	Construction Traffic - The predicted HGV traffic during the construction period is exceptionally high with, for North Falls traffic alone, a growth of 1,457% growth from today on Bentley Road (257 HGV's per day at peak). With a 12 hour work day this would indicate an average of 21 HGV movements per hour, or one every 3 minutes. If you include traffic flows for Five Estuaries as well the HGV traffic growth on Bentley Road is 2,959% with peak traffic of 503 HGV's per day. This equates to a 42 HGV movements every hour, or one every 1.5 minutes. Bentley Road and all roads in the parish of Little Bromley are not designed for such traffic volumes and size. It is not possible for two HGV's to pass on most roads without one of the vehicles mounting the road verge, with subsequent verge damage. The roads themselves are in poor repair, and with this volume of HGV's will deteriorate further and faster. LBPC would like to understand how North Falls will mitigate these highway problems.	Table 27.2 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) includes details of an extensive package of mitigation measures to address comments in regard to the effects of construction traffic upon the users of Bentley Road. An OCTMP (Document Reference: 7.16) is submitted with the DCO application. The OCTMP includes details of the approach to managing the highway condition.
		Construction Traffic Management - LBPC understand that the current traffic management plan is essentially for traffic to be removed from the public highways onto haul roads. It has not been made clear how access of North Falls traffic into and out of haul roads will be achieved - will this be by traffic light control for example - as this could cause delays in the local road network. With predicted traffic volumes for Bentley Road if access is poorly implemented then significant traffic delays and problems could be created. LBPC would also like to understand how North Falls will ensure and police that HGV's and other development traffic does not route through the village of Little Bromley and surrounding single track roads.	An OCTMP (Document Reference: 7.16) is submitted alongside this DCO application and will be further developed and agreed with stakeholders prior to construction. The OCTMP provides details of the proposed approach to managing and monitoring of traffic movements associated with North Falls.

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		Route Disruption - LBPC believe the impact on the local road network around Little Bromley parish will be high. Bentley Road, Paynes Lane, Spratts Lane, Barlon Road, Ardleigh Road and Grange Road will all be crossed by the Export Cable Corridor and Haul Roads. LBPC understand that Bentley Road will be crossed using HDD and we have been advised that the other roads listed will be open trenched. With all these roads affected there will be major disruption to village, farm and business traffic flows, with the key access into the A120 severely restricted. LBPC believe that there is a real risk of Bentley Road effectively being unusable by local traffic, such that the village and surrounding towns main link to the A120 will be severed.	Section 27.6.1.5 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) presents an assessment of the effects of road closures upon driver delay.
		Loss of Village Amenity - The North Falls development and associated facilities such as haul roads, temporary construction compounds and haul road access points will be highly disruptive to day-today village life. Quiet country roads and Public Rights of Way will be affected impacting residents, walkers, cyclists and horse riders. There are many farms which need access to their properties and fields at all times of year, and especially during harvest. Annual events such as the Little Bromley 10k race and the Corbeau Seats Rally use many of the roads and areas of the parish that will be affected by the development. Both these events raise significant funds for local charities. An important village social gathering point is St Marys Church (Grade II* Listed by National Heritage), which will have the underground cabling and haul road passing close and have major development close by. St Marys is maintained by the Church's Conservation Trust, with many events organised by the Friends of Little Bromley Church. Services are still carried out on an occasional basis at the Church. The village bus service runs down Bentley Road, and school buses run daily during term time to take local children to their schools.	Section 27.6.1.3 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) presents an assessment of the effects of the Project upon amenity. Section 27.6.1.5 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) presents an assessment of the effects of road closures upon driver delay. The OCTMP (Document Reference: 7.16) includes details of measures to manage the Projects traffic movements during planned events, such as the Bromley 10k race.
Network Rail	13 July 2023. Consultation Response Letter	Consideration will need to be given to the potential increase in Pork Lane level crossings usage due to large construction vehicles. The level crossing at Pork Lane may not be directly affected. However, road closures within the area may lead to increased traffic and uncontrollable risks at level crossings on the diversion route.	Discussions are ongoing with Network Rail with regards to protective provisions and crossing of Network Rail assets.

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		Details of any proposed road closure should be provided and assessed as necessary.	The Applicant offers the following clarifications with regards traffic movements for the Project's construction:
		The planned route for HGVs is via the B1033 through Thorpe-le-Soken and Kirby Cross, then to the B1032 towards Great Holland. The railway over bridge at Kirby Cross has a restricted height below the usual standard (16ft 6in/5m) at just 13 feet 3 inches, or 4.04 metres. If the large HGV tipper trucks and, or low-loaders conveying plant, which are likely to be used, may not pass under the bridge, they will likely use Pork Lane, the narrow country lane which has an Automatic Half Barrier (AHB) level crossing. The layout of the AHB and approach roads are not suited to multiple large HGVs as the roads are narrow, and a sharp curve can cause blocking back if two large vehicles meet simultaneously. The crossing has a height restriction of 16ft 6in/5m and is subject to a risk of grounding, requiring all long low and slow vehicles to call the signallers for permission to cross. Page 85 of the report states that the expected HGV traffic on Pork Lane in 2026 is expected to be 154, with the works having a daily increase of 104 HGVs. The most recent 9-day traffic survey undertaken in June 2022 by IDASO recorded just 25 HGVs per day, most of which are ECC/viola waste trucks servicing the newly constructed recycling centre and which do not fit under the bridge at Kirby Cross. Therefore, the projected increase by the works of HGVs traverses would be over 200%. The mentioned matters are not included in the transportation report and should be evaluated and raised as a risk. The developer would need to provide Network Rail with a more detailed map of the construction traffic proposed routes. Mitigation measures may be required to address any adverse impact on the level crossing. North Falls Limited will therefore need to engage with Network Rail regarding the proposed scheme and associated transport report	 The extents of the TTSA are detailed in Section 27.3.1 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29). It can be noted from Section 27.3.1 that no traffic is proposed to be routed via Pork Lane. Section 27.6.1.5 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) includes an assessment of potential road closures and does not identify Pork Lane as a possible diversion route. Section 27.3.3 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) describes the proposed access strategy and identifies that HGV traffic travelling to the accesses on the B1032 will be routed from the south, i.e. avoiding the level crossing at Kirby Cross to the north.
Essex County Council	11 August 2023 ETG Meeting 4	An ETG meeting held with Essex County Council to discuss the proposed access locations and designs. During the meeting outline access and crossing designs were shared and agreements were reached with Essex County Council in regard to the location and	The TA (ES Appendix 27.1 (Document Reference: 3.3.64)) includes details of the agreed access and crossing location designs and a copy of the Stage 1 Road Safety Audit (and Designer's response).

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		design of the accesses and crossings. This agreement was subject to the accesses and crossings being subject to an independent Stage 1 Road Safety Audit.	
Essex County Council and National Highways	5 September 2023 ETG Meeting 5	 An ETG meeting held with Essex County Council and National Highways to: Provide an update on the Projects; and Discuss National Highways and Essex County Council's Section 42 comments and the approach to the DCO application documents. Agreements were reached/ reconfirmed with regard to: Approach to capturing baseline traffic flows; The approach to scoping out the assessment of operational traffic and transport impacts; The approach to scoping out the assessment of onshore traffic movements associated with the offshore construction and operational phases; The impacts to be assessed within the EIA; The approach to the assessment of highway safety; The proposed DCO documents; The access strategy, National Highways confirmed they did not need to comment further; The extent of the TTSA; Capacity assessments; The approach to capturing baseline road safety data; The approach to the distribution of HGV traffic; The use of an employee to vehicle ratio of 1.5 persons per vehicle; and The consideration of non-special order abnormal load movements post determination. 	The agreed approach to data gathering is outlined within Section 27.4.2 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) and the accompanying TA (ES Appendix 27.1 (Document Reference: 3.3.64)). The assessment methodology and agreed impacts to be assessed are outlined within Section 27.4 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29). A TA (Appendix 27.1 (Document Reference: 3.3.64)) is provided. The TA includes details of the proposed access strategy and approach to the design of new accesses and crossings. The agreed extents of the agreed TTSA is outlined in Section 27.3.1 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29). The agreed approach to managing potential capacity effects is outlined in Section 27.4.3 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29). The agreed approach to the distribution of HGV traffic and application of the employee to vehicle ratio are provided within the TA (ES Appendix 27.1 (Document Reference: 3.3.64)).
Essex County Council and National Highways	30 October 2023 ETG Meeting 6	An ETG meeting held with Essex County Council and National Highways to discuss the proposed works to Bentley Road and the A120. During the meeting outline designs were shared and agreements were reached with Essex County Council in regard to the location and design of the accesses and crossings. This	The TA (ES Appendix 27.1 (Document Reference: 3.3.64)) includes details of the agreed access and crossing location designs and a copy of the Stage 1 Road Safety Audit (and Designers response).

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Eggay County	11 January 2024	agreement was subject to the accesses and crossings being subject to an independent Stage 1 Road Safety Audit. National Highways raised objections to the proposal to remove the safety barrier in the centre of the A120 to facilitate AIL movements from the A120 to Bentley Road.	The TA also includes details of the proposed temporary footway/cycleway and Bentley Road improvement works. The OCTMP (Document Reference: 7.16) outlines that all highway works would be delivered using a Section 278 agreement. As part of this agreement the future liability for the road widening and footway/cycleway would be agreed. At this stage, following the
Essex County Council and National Highways	11 January 2024 ETG Meeting 7	 An ETG meeting held with Essex County Council and National Highways to discuss the proposed works to Bentley Road and the A120 and review the responses to the Road Safety Audits for the accesses and crossings. Agreements were reached with regard to: A summary of the Stage 1 Road Safety Audit findings were shared. No concerns were raised by Essex County Council in relation to the Road Safety Audit. the implementation of a temporary 40mph speed limit along Bentley Road for the duration of the construction phase. the Bentley Road widening and any land (outside of the highway) being handed to ECC to maintain as highway following completion of construction. During the meeting, Essex County Council were asked if following completion of construction they would wish to retain the offroad footway/cycleway along Bentley Road as a future legacy benefit. Essex County Council advised that at this stage they would not look to maintain the route but would consider the matter further. National Highways restated concerns with the proposal to temporarily remove the safety barrier in the centre of the A120 to facilitate AIL movements from the A120 to Bentley Road. An alternative of contraflowing along the A120 was proposed and National Highways confirmed they would support this option. 	completion of construction it is proposed that the road widening would be retained and transferred to Essex County Council and the footway/cycleway removed. Section 27.4.3.1 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) provides details of the assessment of abnormal loads and confirms the proposals to use of a contraflow arrangement to move between the A120 and Bentley Road. An AIL study is also provided as ES Appendix 27.2 (Document Reference: 3.3.65) of the ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) which confirms that National Highways have provided agreement in principle to this proposed route.
East of England Ambulance Service (EEAST)	26 March 2024 ETG Meeting	An ETG meeting held with EEAST to provide an update on the Projects and discuss their Section 42 comments in regard to traffic and transport and human health and the approach to the DCO assessment. With regard to traffic and transport matters, EEAST raised comments/concerns in regard to delays to ambulances from: • road closures; • use of narrow roads by construction traffic;	With regard to the matters raised by EEAST it was clarified that: <i>Road closures</i> The Applicant have made significant commitments to the use of trenchless technology to ensure that the main roads remain open. Section 27.4.3.2.1 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) outlines that a total of 21 roads will be crossed by the Projects onshore cables and that of these roads,

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	at compounds and accesses due to turning traffic; and movement of abnormal loads. EEAST also requested the road safety assessment and collision locations were shared.	four minor roads could require a road closure with the remaining roads remaining open. Section 27.6.1.5 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) identifies that delays from road closures would be no greater than three minutes and this

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			establishing a line of communication with EEAST and providing updates and detail on the Project (as required) to EEAST to plan and manage their activities.
			Abnormal Loads
			The matter was discussed with EEAST at the meeting and its was agreed that the CoCP (Document Reference: 7.13) should include a commitment to notifying EEAST of the timing and routeing of any abnormal load movements. The CoCP (Document Reference: 7.13) and OCTMP (Document Reference: 7.16) include details of the approach to notifying EEAST of abnormal load movements. Section 27.4.3.1 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) includes details of the approach to the consideration of abnormal loads.
			Road Safety Section 27.6.1.4 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) provides a detailed assessment of the highway safety effects of North Falls and also includes details of conversations with Essex County Council's Road Safety Team in regard to potential mitigation measures.
Babergh and Mid Suffolk Council	17/04/2024 Consultation response to targeted consultation	Babergh and Mid Suffolk district councils remain interested in the impact of the project on tourism, jobs and socio-economics, highways and traffic flows, the operation of Felixstowe Freeport and particularly having regard to the cumulative impacts of the projects with other significant developments in the region and how these might interact and affect the communities and environments of the districts. The focussed consultation does not change the councils' previously stated position.	A detailed assessment of the Projects' traffic and transport impacts (including cumulative impacts of major projects and interactions) is provided within ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) of the ES.
East Suffolk Council	28/03/2024 Consultation response to targeted consultation	It is understood that the targeted consultation is focussed on proposed localised changes to the project's onshore PEIR boundary within the District of Tendring, Essex. We note the proposed changes are in relation to additional land requirements in vicinity of the substation, locations where additional land is required to accommodate the onshore cable corridor, locations identified for access points for operating and maintaining the project over the operational lifespan, areas relating to construction traffic visibility splays and temporary construction compounds, and improvements /	Noted.

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		widening of highway areas needed to facilitate the project's construction. As all of the proposed onshore changes relating to the onshore order limits boundary are entirely within the district of Tendring, with no onshore infrastructure proposed within East Suffolk, we have no further comments to make at this time.	
Essex County Fire and Rescue Service	04/2024 Consultation response to targeted	Essex County Fire and Rescue Service raised a number of points for consideration during the continued development of North Falls Offshore Wind Farm. The salient traffic and transport comments are detailed below:	Noted.
	consultation	Implementation of vision zero principles where there are introductions of or changes to the road network. Consideration should be given to the provision of road safety measures, especially in proximity to places of significant footfall and assembly such as school, health centres, halls and shops.	ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) outlines that an access strategy has been developed that seeks to reduce the impact of construction traffic upon the most sensitive communities and to minimise travelling via narrow roads. The access strategy would be facilitated by the following embedded mitigation measures to minimise the traffic impact on local roads:
			 The construction of a temporary haul road along the onshore cable route; The creation of vehicle crossovers; and Controls on vehicle routing.
			Section 27.6 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) outlines the assessed traffic and transport impacts upon all users for the impacts of, pedestrian and cycle severance and amenity (including PRoW), road safety, and driver delay (capacity) and concludes that effects would not be significant in EIA terms.
		Consideration for road widths to be accessible whilst not impeding emergency service vehicle response through safe access routes for fire appliances including room to manoeuvre (such as turning circles).	Section 27.4.3 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) outlines that no links are assessed to be of constrained width for HGVs. There is therefore considered to be 'adequate 'road space' for emergency vehicles.
		Access for Fire Service purposes must be considered in accordance with the Essex Act 1987 – Section 13, with new roads or surfaces compliant with the table below to withstand the standard 18 tonne fire appliances used by Essex County Fire and Rescue Service. Also, Implementation of a transport strategy to minimise the impact	Chapter 5 Project Description (Document Reference: 3.1.7) includes details the design of the Project's infrastructure. The design of access roads will be undertaken in compliance with the relevant design and construction standards during detailed design, as detailed in the OCoCP (Document Reference: 7.13). This

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		of construction and prevent an increase in the number of road traffic collisions.	includes design of the access roads in compliance with Essex Act 1987 Section 13.
			Section 27.6.1.4 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) includes a detailed assessment of the Project's construction traffic upon highway safety. The OCTMP (Document Reference: 7.16) includes details of the Project's construction traffic management to minimise any impacts upon highways safety.
			The Project has also committed to preparing a Stakeholder Communications Plan, which will include requirements for communications with all blue light services prior to and during construction. Further details on the plan can be found in the OCoCP (Document Reference: 7.13).
		Any development should not negatively impact on the Service's ability to respond to an incident in the local area.	The Traffic Management Act 2004 places a Network Management Duty on the highway authority to "manage their road network' in a way that secures 'the expeditious movement of traffic"
			Section 27.4.3 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) outlines an agreement with National Highways and Essex County Council in their role as Network Managers with regard to how driver delay (capacity) impacts should be assessed and mitigated and that the arrival and departure profile of North Falls traffic would be managed during peak periods, thereby ensuring the expeditious movement of all traffic (including emergency services).
			The OCTMP (Document Reference: 7.16) includes a commitment engaging with the emergency services and providing advanced notification of closures and diversion routes.
			Section 4.10 of the OCTMP (Document Reference: 7.16) also includes details Incident Management Measures reduce the potential for the Projects construction traffic to have an adverse effect upon the highway network during planned and unplanned events e.g. major incidents on the highway.
Tendring Parish Council	04/2024 Consultation response to	There are some concerns about the suitability of the Operations and Maintenance routes along Wolves Hall Lane as vehicles will have to pass through an area of residential housing to reach the route, whilst a small vehicle will cause no problems if the need arises for	With regard to operation and maintenance of the Project, Section 27.6.2 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) outlines that inspections / maintenance of the onshore cable route will be infrequent and subject to very low

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	targeted consultation	larger plant machinery then access for residents will be compromised. This is also true of the single track road that constitutes Wolves Hall Lane.	vehicle demand and consequently, no significant traffic and transport effects are anticipated during the Project's operational phase.
		Our concerns for the Operation and Maintenance route along Lodge Lane are also similar in that large vehicles will cause accessibility issues for residents and emergency vehicles should they be needed. An additional concern for Lodge lane is the suitability of the bridge for heavy plant vehicles. We would hope that the vehicles using the temporary construction compound at Swan Lane do not use the B1035 through the Village to access the A120 and that operational times are strictly adhered to. The B1035 through the Village is unsuitable for large vehicles, this is also true for Crow Lane. Five Estuaries have agreed this restriction and can operate under these parameters.	With regard to the access to the temporary construction compound, an OCTMP (Document Reference: 7.16) is submitted with the DCO application which addresses this matter. The OCTMP (Document Reference: 7.16) includes details of measures to manage, monitor and enforce the routes that would be used by HGVs. The OCTMP (Document Reference: 7.16) outlines that no HGVs would be permitted to route through Tendring village and Crow Lane. The OCTMP also includes details on measures to manage, monitor and enforce delivery time restrictions.
Little Bromley Parish Council	21/04/2024 Consultation response to targeted consultation	Little Bromley Council provided an extensive response to the targeted consultation, the following provides details of traffic and transport matters.	-
		You mention that in order to do widening works you are proposing traffic lights at each end of Bentley Road and closures. This would have a major impact on residents and businesses as it is the main entrance to the village.	To ensure the safety of road users during the construction of the improvements works there will be a requirement for the implementation of temporary traffic management, e.g. temporary traffic signals.
			The OCTMP (Document Reference: 7.16) outlines that details of the temporary traffic management would need to be developed in liaison with Essex County Council. Traffic Management measures would be developed to minimise disruption to the travelling public and would be subject to approval by Essex County Council using their statutory duties.
		In addition, the impact on the local road network around Little Bromley parish will be high. Bentley Road, Paynes Lane, Spratts Lane, Barlon Road, Ardleigh Road and Grange Road will all be crossed by the Export Cable Corridor and Haul Roads. With all these roads affected there will be major disruption to village, farm and business traffic flows, with the key access into the A120 severely restricted. There is a real risk of Bentley Road effectively being unusable by local traffic, such that the village and surrounding towns main link to the A120 will be severed.	ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) outlines that an access strategy has been developed that seeks to reduce the impact of HGV traffic upon the most sensitive communities and to minimise travelling via narrow roads. The access strategy would be facilitated by the following embedded mitigation measures to minimise the traffic impact on local roads: The construction of a temporary haul road along the onshore cable route;

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		Quiet country roads and Public Rights of Way will be affected impacting residents, walkers, cyclists and horse riders. There are many farms which need access to their properties and fields at all times of year, and especially during harvest. We can foresee fatal accidents happening when being faced with heavy HGVs. In addition, the village bus service runs down Bentley Road, and school buses run daily during term time to take local children to their schools. Bentley Road is used by many running and cycling clubs and the annual Tour de Tendring event. You propose a cycling and walking track along Bentley Road but this will not be continuous as there are properties obstructing the development of this.	 The creation of vehicle crossovers; and Controls on vehicle routing. The TA (provided as ES Appendix 27.1 (Document Reference: 3.3.64)) includes details of the proposed access strategy. It can be noted from the TA, that no access for construction traffic is proposed from six of the seven roads listed by the Parish Council (Paynes Lane, Spratts Lane, Barlon Road, Ardleigh Road and Grange Road). To facilitate this strategy is it proposed that all HGV traffic would be routed via Bentley Road toward the A120, thus avoiding the requirement for HGV traffic to travel north through the village of Little Bromley or the six narrow roads listed above. Section 27.6 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) outlines the assessed traffic and transport impacts upon all users of Bentley Road for the impacts of, pedestrian and cycle severance and amenity (including PRoW), road safety, and driver delay (capacity) and concludes that effects would not be significant in EIA terms. Section 4.10 of the OCTMP (Document Reference: 7.16) includes details Incident Management Measures reduce the potential for the Projects construction traffic to have an adverse effect upon the highway network during planned and unplanned events e.g. planned local events, e.g. bike races.
		We fear that the longer term impact of widening Bentley Road will increase traffic for people who would have previously used the B1035 as it will become a cut through. Have you carried out any investigation into the long term impact and anticipated changes to traffic behaviour based on the widening of Bentley Road?	ES Chapter 5 Project Description (Document Reference: 3.1.7) includes details of the proposals to widen Bentley Road for approximately 1.1km from the A120 to the proposed access to the temporary haul road. The remaining 4.3km of Bentley Road/Bromley Road north of the temporary haul road toward the A137/B1352 would remain unaltered. The proposals would increase the width of this short section of Bentley Road from approximately 5.0m – 5.5m in width to 6.5m in width to facilitate the safe passing of two HGVs (a HGV is approximately 2.5m wide) to the temporary haul road, no HGVs for the Projects would arrive/depart to the north. There is an existing 7.5tonne environmental weight limit in place along Bentley Road to prevent HGVs 'cutting through' from the A120 to the A137 and

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			therefore the widening of Bentley Road would not be expected to induce additional HGV traffic. With regard to all other traffic categories, journey time is the metric that can induce motorists to choose alternative routes. The existing width of Bentley Road is not a constraint to the passage of two cars/vans etc and as such widening Bentley Road would not be expected to materially reduce journey times and therefore is unlikely to induce additional traffic movements.
		Also, have you carried out any investigations on the cumulative impact of traffic movement considering NG's and FE's proposed access and is there a combined traffic impact assessment for NF/FE/NG all together?	Section 27.8 of this ES (ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29)) includes details of the assessment of cumulative effects with other developments (including Norwich to Tilbury and Five Estuaries Offshore Wind Farm ('Five Estuaries')).
National Highways	21/04/2024 Consultation response to targeted consultation	AECOM on behalf of National Highways, provided comments on the Projects targeted consultation. These comments are detailed below.	-
Tilgriways		It is recommended that drawings of the proposed construction access to the TCCs should be provided to National Highways for review to determine whether construction access to the TCCs will impact the SRN. AECOM recommend that visibility splays would need to be	The Applicant haves discussed this matter with National Highways at ETG meetings (5 September 2023, 30 October 2023, and 11 January 2024) (summarised further within this table (Table 1.1). During these meetings details of the accesses, visibility splays and road safety audit findings were shared with National Highways who confirmed that they were content with the location of the proposed
		undertaken where there are proposed changes to the junction layout of the SRN (i.e. at A120 / B1035 (Horsley Cross) roundabout and at A120 / Bentley Road junction).	accesses and there would not be an interaction with the SRN. The targeted consultation has not introduced further points of access beyond those previously shared and agreed with National Highways at the ETG meetings listed.
			The TA (ES Appendix 27.1 (Document Reference: 3.3.64)) submitted with the DCO application includes details of the outline access designs (detailing visibility splays, measured speeds, highway boundary and signage) and copies of a Stage 1 Road Safety Audit.
		Proposals to modify the junction of Bentley Road with the A120 to facilitate construction traffic movements should be supported by a Stage 1 Road Safety Audit, and Walking, Cycling, and Horse Riding Assessment and Review (WCHAR), and take account of the potential use of this junction by abnormal loads. It is emphasised	The TA (ES Appendix 27.1 (Document Reference: 3.3.64)) submitted with the DCO application includes details of the outline design of the A120 and Bentley Road junction improvements. Section 27.4.3.1 of ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) provides details of the assessment of abnormal

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		that the current layout of the junction, including a central barrier on the A120, is the result of a road traffic collision reduction measure."	loads and confirms the proposals to use of a contraflow arrangement to move between the A120 and Bentley Road. An AIL study is also provided as ES Appendix 27.2 (Document Reference: 3.3.65) of the ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) which confirms that National Highways have provided agreement in principle to this proposed route.
		The PEIR Addendum states that the proposed Bentley Road improvement works would require temporary traffic management measures to be installed, which is to be discussed with Essex County Council. As this would impact the operation of the SRN, National Highways should be included in these discussions.	Section 4.7 of the OCTMP (Document Reference: 7.16) outlines that to ensure the safety of road users and minimise delays during the construction of the accesses, crossings and offsite highway works there will be a requirement for the implementation of temporary traffic management. The OCTMP outlines that details of the temporary traffic management would need to be developed in liaison with Essex County Council (and National Highways where appropriate). The OCTMP is secured by DCO requirement, which requires that National Highways be consulted on the final CTMP prior to the commencement of the Project.





HARNESSING THE POWER OF NORTH SEA WIND

North Falls Offshore Wind Farm Limited

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