

From: [Shaw, John R](#)
To: [Norfolk Vanguard](#)
Cc: [REDACTED]
Subject: Application by: - Norfolk Vanguard Limited for an Order Granting Development Consent for the Norfolk Vanguard Offshore Wind Farm Project
Date: 16 January 2019 16:37:19
Attachments: [image004.png](#)
[image006.png](#)
[image008.png](#)
[Response_EN010079.pdf](#)
Importance: High

Your Ref: EN010079
My Ref: 8/1/18/0088

Dear Sir/ Madam

**Application by:- Norfolk Vanguard Limited for an Order Granting Development Consent for the Norfolk Vanguard Offshore Wind Farm Project
The ExA's Written Questions and Requests for Information**

I refer to your written questions and requests for information issued on 19 December 2018.

Please find attached answers to the highway elements of your request from Norfolk County Council in its capacity as Local Highway Authority.

Regards

John Shaw, Senior Engineer

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Norfolk County Council



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Your Ref: EN010079
Date: 15 January 2019

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Dear Sir/ Madam

**Application by:- Norfolk Vanguard Limited for an Order Granting Development Consent for the Norfolk Vanguard Offshore Wind Farm Project
The ExA's Written Questions and Requests for Information**

I refer to your written questions and requests for additional information issued on the 19th of December 2018.

Please find below answers to the highway elements of your request from Norfolk County Council (NCC) in its capacity as Local Highway Authority (LHA).

Qu 11.1 (page 21)

(i) Methodology, baseline data, assumptions and predicted traffic movements used to assess traffic and transport impacts in Chapter 24 of the ES.

The LHA have no issues to raise other than the specific points identified below.

(ii) Mitigation measures

- **Outline Traffic Management Plan** – The LHA are **not** content with the mitigation and management measures proposed.

Link 68 (The Street at Oulton) which serves mobilisation area MA7 is identified as requiring traffic management measures. The Applicants intended solution is to use a pilot vehicle to guide traffic into passing places. However, no suitable passing places exist. Minor improvements are also required to aid forward visibility. Providing a pilot vehicle without addressing the narrowness of the road simply exacerbates the problem - the Applicants are just adding to the number of vehicles on the road which are then in turn also competing to pass.

The LHA draw your attention to the fact that traffic associated with the Hornsea 3 wind farm proposal also intends to utilise link 68 (albeit in a more intensive manner). The LHA supports a mitigation scheme proposed by Orstead (the Applicants for Hornsea 3) which we believe overcomes the issue of either Vanguard or Orstead using link 68 **independently of each other**. We are simply looking for Vanguard to provide the same package of temporary off-site highway works but they are reluctant to do so.

To put matters into context, the mitigation works sought by the LHA are mainly of a temporary nature and we believe them to be reasonable; necessary and to be in scale / proportion to the issue identified.

In addition to the above, the LHA also require an assessment of the cumulative effects resulting from Orstead; Vanguard and Boreas using link 68. **This work has not yet been undertaken.**

Given the LHA's preference for the mitigation to be temporary in nature, there also needs to be an agreement between Vanguard and Orsetead as to who would subsequently remove the mitigation works.

- **Outline Access Management Plan [APP-034]** – The LHA have no specific points to raise.
- **Outline Travel Plan [APP-033]** – The LHA have no specific points to raise. We note a commitment has been provided that all construction traffic associated with the onshore works, including that derived from relevant ports, will be included within the relevant final Travel Plan for each stage of the works.
- **Outline Code of Construction Practice [APP-025]** - No issues to raise.

(iii) Additional outstanding points: -

Temporary signage will be required in accordance with TSRGD as well as Temporary speed limits via Temporary Traffic Regulation Orders. The exact details to be confirmed via the final Traffic Management plan. We also require a commitment to remove temporary construction access other than those subsequently approved by the LHA.

The final Traffic management plan will also need updating to cover seasonal traffic sensitivity demands on coastal routes.

(iv) Definition of a single HGV movement

We believe this to be a matter for the Applicant to define. Nevertheless, the industry standard is that a vehicle travelling to a site counts as a single movement with the return trip travelling away from the site constituting a second movement - ie its one vehicle but making two movements.

Qu 11.2 (page 21)

(i) Traffic flows

The LHA have no specific points to raise.

(ii) Sensitivity receptors

The LHA have no specific points to raise.

Qu 11.9 (page 23)

Alleviation of Traffic resulting from the Northern Distributor Road

The northern distributor road opened in April. It has encouraged use of some of the distributor routes that connect to it, such that they are now busier. At this stage we do **not** believe it alleviates sufficiently to be able to negate a 147% increase in HGV traffic at this junction.

The LHA are nevertheless satisfied a solution can be found and accordingly we would be content for this issue to be addressed via the detailed Traffic Management Plan (TMP) post-consent provided **the outline TMP is updated by the Applicant to specifically provide a commitment to address the issue.**

Qu 11.10 (page 24)

(ii) Cumulative Impacts

The LHA note that Orstead indicated within their response to the Examining Authority's first written questions for Hornsea 3 (see Qu 1.11.9 for that specific hearing) that there may be cumulative impacts on a small number of shared road links with Norfolk Vanguard (and Boreas Ltd) during construction.

Further details are awaited from both Norfolk Vanguard and Orstead.

Qu 11.11 (page 24)

(i) Simultaneous Construction

As per question 11.10 above - Further details are awaited from Norfolk Vanguard and Orstead.

Qu 11.12 (page 24)

Use of the Street at Oulton

Please see our detailed comments within our response to question 11.1 above and question 11.18 below.

Until this issue is resolved, NCC maintains its holding objection.

Qu 11.13 (page 25)

Horizontal direct drilling

The LHA note the Outline Access Management Plan gives a commitment to trenchless crossing techniques at key sensitive features.

Given the sensitivities surrounding Link 68 identified within this letter and the fact this crossing is located in close proximity to that access route, **the LHA support the Parish Councils request that the Applicant gives a firm commitment to horizontal direct drilling for this crossing.**

Qu 11.15 (page 25)

Severance

The impact from traffic upon residential amenity is a District Council issue, nevertheless a commitment should be given to set up local stakeholder involvement group/s to enable any traffic issues arising during the construction phase to be discussed and resolved. The final TMP will need to give a commitment to allow access to residential properties.

Qu 11.16 (page 26)

Issues identified by Cawston Parish Council

As a result of detailed discussions with Orstead, it has now become apparent the bridge at Cawston may not be able to cater for abnormal loads both in terms of weight and width. The LHA has asked Orstead to undertake a bridge inspection and submit an assessment report along with a technical structures approval submission.

If it assists the ExA, the abnormal loads for Orstead relate to cable drums which we now understand measure some 4.5m high x 4.14m wide and have a weight of 32.7 tonnes. Using a stretched 4 axle low loader and drive train with additional weight of circa 19 tonnes, the maximum expected load for each cable drum to be transport is 51.7 tonnes.

With the above in mind, we would now ask Vanguard to clarify the nature of any abnormal loads they intend to pass through Cawston together with an indication of the size of their expected cable drums.

Qu 11.18 (page 26)

(i) Holding Objection

It has subsequently been clarified that whilst Orstead propose to use link 68 to gain access to their main compound, Vanguard intend to use this link in a less intensive manner as access to a mobilisation area. Nevertheless, our assessment has still been made against the Applicants stated traffic figures and our concerns remain as set out within our response to Qu 11.1 above.

The LHA's assessment is based on the following traffic figures as submitted by the Applicant. During duct installation the peak traffic demand is 96 daily HGV movements, during a 16-week period in 2022 and a further 6 weeks at 88 daily HGV movements also in 2022. During the cable pull peak traffic demand is 64 daily HGV movements for approximately 20 weeks during 2024.

(ii) Options

Providing a pilot vehicle as proposed by the Applicant simply exacerbates the problem rather than resolving it. (see Qu 11.1 above).

The Applicants intention is that a "...pilot vehicle would exit the access and travel to a designated layby/passing place. The pilot vehicle would then temporarily stop oncoming traffic and radio to the HGV driver to exit the site and traverse to the designated passing place. **However, there are no suitable passing places. Accordingly, the Applicants solution simply cannot work.**

Our profession advice is that whichever project comes along first needs to deliver a scheme of mitigation works to provide passing provision. However there also needs to be (i) an assessment of cumulative impacts and (ii) an agreement between Vanguard and Orsetead as to who will subsequently remove the mitigation works and re-instates the highway.

We believe there is a realistic and proportionate solution. We are simply looking for Vanguard to provide the same package of mitigation works as Orstead but they are reluctant to do so. **In the circumstances we have no option but to maintain our holding objection with a view to upgrading that to a full recommendation of refusal if the issue is not addressed.**

Qu 11.19 (page 26)

A47(T) access options

Traffic assessments for the A47(T) are issues for Highways England to comment upon and not NCC. Nevertheless, NCC would express concern should an access strategy be adopted that does not comply in full with the Design Manual for Roads and Bridges.

Qu 11.21 (page 27)

Dualling of the A47(T)

NCC is not objecting to the proposed cable routes.

We understand the Statement of Common Ground between Hornsea Three and Highways England is to be updated and submitted (at Deadline 4 to that hearing) to include an agreement between those parties in respect to the interaction with the A47 road dualling. **At this stage we would be content for Vanguard to provide a similar commitment.**

Qu 11.31 (page 27)

(i) OTMP – delivery times

The control of delivery times is expected to be site specific. The LHA would be content for this to be written into the final TMP.

(ii) Abnormal loads

This needs to be written into the final TMP, with proposals for specific indivisible loads so we can assess route suitability.

Notwithstanding the above, please also see our response to Qu 11.16 above relating to abnormal loads at Cawston and the size / weight of potential cable drums.

Qu 20.17 (page 66)

Temporary stopping up of streets

This accords with the general principles for TTROs for closures etc. There is no requirement for vehicle access to property to be maintained, only pedestrian access. However, consideration must be made for emergency vehicles, and access for things such as medical supplies/services. Similarly access to businesses (farms etc) must be made, or alternatives agreed.

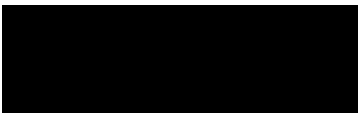
Qu 20.20 (page 67)

28 day approval period

We are able to confirm 28 days is an acceptable time scale to us.

If I can be of further assistance then please let me know.

Yours sincerely



Senior Engineer - Highways Development Manager
for Executive Director for Community and Environmental Services