

Norfolk Vanguard Offshore Wind Farm

Norfolk Vanguard Limited

North Norfolk District Council
Position Statement - HGV
Waiting Areas and Cart Gap
seawall

Document Reference: ExA; ISH4; 10.D6.8

Deadline 6

Date: 05 April 2019

Photo: Kentish Flats Offshore Wind Farm



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1 POSITION STATEMENT

1. During the Issue Specific Hearing on Environmental Matters (ISH4) on the 27 March 2019, the Examining Authority (ExA) requested an update from the Applicant regarding a request from North Norfolk District Council (NNDC) to identify suitable waiting areas for Heavy Goods Vehicles (HGVs) and wording associated with start-up / shut down (Action Point 12); as well as an update of any discussions related to Cart Gap sea wall (Action Point 11).
2. The Applicant has subsequently spoken with North Norfolk District Council on these matters.

1.1 Waiting Areas

3. The Applicant has provided detailed reasoning at further question 12.15 submitted at Deadline 4 (ExA; Further WQ; 10.D4.6) explaining the preference to manage HGV delivery profiles through supplier contracts and enforcement of delivery timing restrictions, rather than introduce measures that may encourage suppliers to ignore these timings. The approach to delivery management is also set out in the Outline Traffic Management Plan (DCO doc: 8.8). NNDC advised that suppliers should be provided with details of existing waiting areas and that Hornsea Project Three had made a similar commitment to identify these areas.
4. The approach proposed by Hornsea Project Three includes a commitment to advise drivers of approved lorry parks, motorway services or other designated parking areas between the source of the delivery and the site compound. This will assist drivers when they may be running early / late in relation to set delivery timeslots to avoid instances where drivers arrive outside of their timeslot and attempt to wait nearby. The Applicant has reviewed Hornsea Project Three's Construction Traffic Management Plan and will commit to adopting a similar approach. This will be captured within an update to the Norfolk Vanguard Outline Traffic Management Plan.

1.2 Start-up / shut down

5. The Applicant provided typical start up and shut down activities in response to Q13.14 of the Examiner's second written questions (ExA; Further WQ; 10.D4.6). During ISH4, NNDC requested further details of the types of activities that may occur during start-up and shut down and associated timings. NNDC advised that Hornsea Project Three included more details and timings of start-up / shut down activities within their Outline Code of Construction Practice and NNDC would expect Norfolk Vanguard to follow the Hornsea Project Three approach.

6. The Applicant has subsequently reviewed the Hornsea Project Three documentation and will adopt the same approach. This will be captured within an update to the Norfolk Vanguard outline Code of Construction Practice (document reference 8.1), which will be submitted to the Examination at Deadline 7.

1.3 Cart Gap sea wall

7. The position of NNDC and the Applicant in respect of Cart Gap and reusing materials was set out across pages 7-9 within the Statement of Common Ground (SoCG) submitted by the Applicant at Deadline 4 (REP4-016). During discussion at Issue Specific Hearing 4 concerning whether this matter should be secured within the DCO, NNDC indicated that this was part of the soil management process and should be captured within the Requirements. The Applicant referred to the response provided at Deadline 5 (REP5-004) in particular in relation to Q16.32 which suggested the matter should fall outside the scope of the DCO. The ExA asked both parties to undertake further discussions and provide an update for Deadline 6 as Action Point 11.
8. Following a teleconference to discuss this matter between the Applicant and NNDC, the position agreed between the parties is that the use of clean spoil from the project in relation to coastal defence matters at Cart Gap can be explored further outside of the DCO process.
9. In coming to this view the parties recognised that there are a range of factors that will need to be considered in taking this separate project forward outside of the DCO process. These include, amongst other things, understanding:
 - how much clean spoil is likely to be generated;
 - how much traffic this will take off the wider network (in terms of delivering positive benefits)
 - how or where the soil will be deposited;
 - How access will be gained to cliffs (noting Happisburgh PC comments at ISH 4 about there being no access);
 - how damage to cliffs will be minimised; and
 - any EIA/Habitats Regulations issues from these activities, which would need to form the basis of any separate application/consent or licence.
10. At this early stage, discussions centred on understanding the types of materials likely to arise from Norfolk Vanguard that could be re-used, including options to capture material within 'geobags' or 'geocubes' to increase its effectiveness for coastal applications. The Applicant has agreed to provide estimates of volumes and materials to NNDC.

11. A future application for consent will be explored between both parties and relevant landowners, at the appropriate time outside of the DCO process. Both parties recognise there are benefits in exploring this project further: for the Applicant in reducing the cost of transporting and disposing of materials off site and for NNDC through reducing traffic movements and allowing clean spoil to be used for coastal defence purposes. However these benefits are not necessary to address any of the impacts of the Norfolk Vanguard DCO application. In essence, it may provide additional benefit, but it is not a matter which the ExA can or should factor into its decision-making.
12. The Cart Gap project is also not necessary to address coastal erosion (although it is hoped it would provide a sensible additional benefit, with the aim of reducing coastal erosion). The Applicant's response to Q2.1 in its Deadline 4 Response to the ExA's Further Written Questions (REP4-040) sets out the position in relation to landfall (pgs 6-7). This is informed by the Coastal Erosion Study carried out as part of the Environmental Impact Assessment and includes the employment of Horizontal Directional Drilling. The parties agree that this, combined with a monitoring requirement, adequately addresses the issue of coastal erosion.