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Subject: Oulton Parish Council registration no: 20012656 deadline 8
Date: 29 May 2019 16:27:02
Attachments: [Oulton Parish Council NV deadline 8 response.docx](#)

Please find attached Oulton Parish Council submission at deadline 8.

Regards,
Susan Mather
pp
Paul Killingback Chair
Oulton Parish Council

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Oulton Parish Councils response at deadline 8 to applicants deadline 7 submissions

Noise mitigation Measures at The Old Railway Gatehouse Position Statement Issue Specific Hearing 6 action point 14,

AND

Air quality assessment for Old railway Gatehouse Position Statement Issue Specific Hearing 6 action point 15,

And the recent

Technical Note Responding to Norfolk County Council's Request for Trenchless Crossings of the A1067 and B1149

Noise Mitigation Measures

Oulton Parish Council notes the adoption of the Road Mitigation Scheme by Vattenfall as proposed by Orsted Hornsea Three. This will form continuity if both projects are granted their DCO's. However OPC is still unclear how the proposed mitigation plans will be transferrable if HOW3 does not proceed with its DCO. Vattenfall have not produced their own set of plans as part of their DCO. OPC raises the issue of copyright/liability if designed by a third party for HOW3 but used by Vattenfall.

Further mitigations were proposed by HOW3 for the Old Railway Gatehouse, OPC questions the commitment to honour these proposals by Vattenfall given their response at deadline 7....

'These measures include installation of double glazing along the façade closest to The Street, or the provision of a wall along the garden of the property. Hornsea Project Three state that these options would be taken forward should residents wish; however they are not essential to mitigate the potential noise effects (Hornsea Project Three, Deadline 6 submission: Appendix 23 – Construction Traffic Noise and Vibration Assessment at The Old Railway Gatehouse).'

'The Applicant is in the process of discussing these optional mitigation measures with the owner of The Old Railway Gatehouse and a further update will be given at Deadline 8.'

Applicants Noise Assessment – Idling and Accelerating HGVs in Proximity to The Old Railway Gatehouse

OPC observe that the applicant has made the assumption that with the proposed mitigation of road regrading and 30mph speed limit/Priority signage this will reduce noise impacts from HGV's passing The Old Railway Gatehouse. The mitigations will reduce the impact of vibrations and some noise along the regraded hump; however it is unclear how engine noise will be reduced from traffic approaching the Old Railway Gatehouse, as it will still be audible on the approach to, stopping by and on leaving the regraded road section.

In close proximity to The Gatehouse is the entrance to HOW3 compound and Heydon Rd route to MA7/Cable logistics area. Traffic will have to stop to assess whether they can proceed onto The Street and would then have to stop to give way according to what is proceeding along the priority signed stretch of road at the Gatehouse. This would account for at least 4 scenarios for stopping and starting.

The applicant has gone onto assessing the impact of traffic waiting in the lay-by (Passing place) and stated in the **Noise mitigation Measures** document that: **10% of HGV traffic would be required to wait in the lay-by until the carriageway was passable;**

This scenario has been used to re-run the Noise Assessment.

However on reading the Air Quality Assessment which has also been re-run, OPC note that there was another scenario of **25% of HGV traffic waiting** in the Lay-by (Passing place), this second scenario used in the air quality assessment seems to have been overlooked in the Noise Assessment.

Air Quality assessment: 12. Only a small proportion of passing vehicles would be required to stop at the proposed passing place at The Old Railway Gatehouse. For the purpose of this note, two scenarios have been tested, based on professional judgement:

- **Low scenario - that during the daytime 10% of the cumulative HGVs along Link 68 would have to stop at the passing place.**
- **High scenario - that during the daytime 25% of the cumulative HGVs along Link 68 would have to stop at the passing place.**

Using the 10% or 25% scenarios of HGV traffic waiting in the Lay-By (Passing place), this equates to 21/53 daily (NV/HOW3 only HGV's) or 1 / 4 an hour (over 12 hour day). This does not take into account agricultural traffic/existing HGV's.

The assessment of HGV's has steered away from the issue of other traffic associated with both projects and an assumption that cars and vans will not be noticeable. There will be 210 HOW3/NV project related vehicles daily (peak) as well as the combined 214 HGV's (peak), excluding existing traffic.

The extract below* *From page 3 UK Noise Association (2009) Speed and Road Traffic Noise – The role that lower speed could play in cutting noise from traffic.*

**The traffic mix is an important factor in both overall noise and noise peaks. Heavy vehicles, mopeds and motorcycles are disproportionately noisy. At 30 km/h (19mph) one heavy vehicle can emit as much noise as 15 cars.*

This would seem to suggest that traffic mix is important to the types of noise experienced, and suggests that 1 HGV could sound like 15 cars. This would mean in sound terms the residents could experience the combined traffic equivalent of 3,420 cars passing daily.

It goes on to state...

However, light vehicles dominate traffic noise because they account for most of the traffic. Even on roads where there is a greater percentage of heavy traffic, cars will still usually dominate noise levels because of their higher speeds.

There is no guarantee that cars will uphold the speed restrictions, with a reduced gradient on the old railway hump some traffic will be tempted to go faster. This has always been a concern to OPC that the smoothing of the hump will remove an effective speed hump.

Air Quality – The Old Railway Gatehouse

The applicant has concluded that the Air Quality Assessment will result in a negligible impact. The assessment methodology used, ***as set out in section 26.4.1.2 of Environmental Statement Chapter 26 Air Quality.***

OPC note that their query regarding Intensive farming was investigated and emissions from ammonia were put to one side. However the applicant did acknowledge that ammonia emissions can result in secondary particulate matter and goes on to say

'Particulate matter has health-based Objectives, and the contribution from secondary particulate matter formation is included within the Defra mapped background data used in the assessment. It is not possible to calculate the proportion of secondary particulate'

OPC would point out that the intensive turkey farm has a permit from the Environment Agency which monitors the annual discharge of PM10 and is subject to control of those emissions. The screen shot **Table 1** shows the Environment Agency permit information (*environment agency 'what's in your back yard'*) for emissions up to 2012.....

Table 1 PM10 emissions from 2007 - 2012

Particulates (PM10) (Grid reference: X: 614,803.79; Y: 326,942.67)

This table shows the amount of substance released, for each authorisation in the area you chose. Largest releases are shown first.

Page 1 of 1 (6 results for selected location)

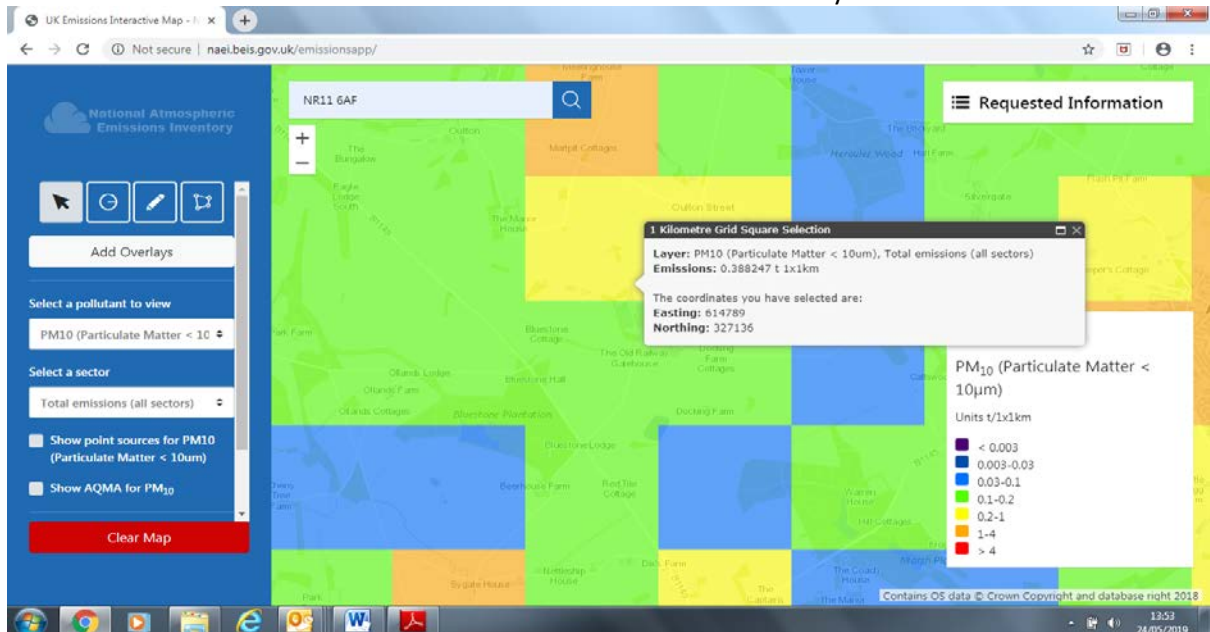
Operator name	Site address	Year	Quantity released (tonnes)
Bernard Matthews Foods Limited	Oulton Poultry Farm The Street The Old Airfield Oulton Norfolk	2012	27.2919
Bernard Matthews Foods Limited	Oulton Poultry Farm The Street The Old Airfield Oulton Norfolk	2011	35.4585
Bernard Matthews Foods Limited	Oulton Poultry Farm The Street The Old Airfield Oulton Norfolk	2010	38.3019
Bernard Matthews Foods Limited	Oulton Poultry Farm The Street The Old Airfield Oulton Norfolk	2009	29.2575
Bernard Matthews Foods Limited	Oulton Poultry Farm The Street The Old Airfield Oulton Norfolk	2008	29.7339
Bernard Matthews Foods Limited	Oulton Poultry Farm The Street The Old Airfield Oulton Norfolk	2007	28.366

Following the Farms change of ownership...latest information applied for from environment agency, freedom of information request. (See Appendix 1) Unfortunately does not give more recent annual emissions for PM10 but does indicate that the farm applied to increase production of up to 132,000 turkeys from 2010

Table 2 map <http://naei.beis.gov.uk/emissionsapp/>

Shows current emissions for the area around the turkey farm it also highlights that PM10 varies across this area. This could mean areas not assessed could be exposed to higher emission dispersion along and beyond access routes.

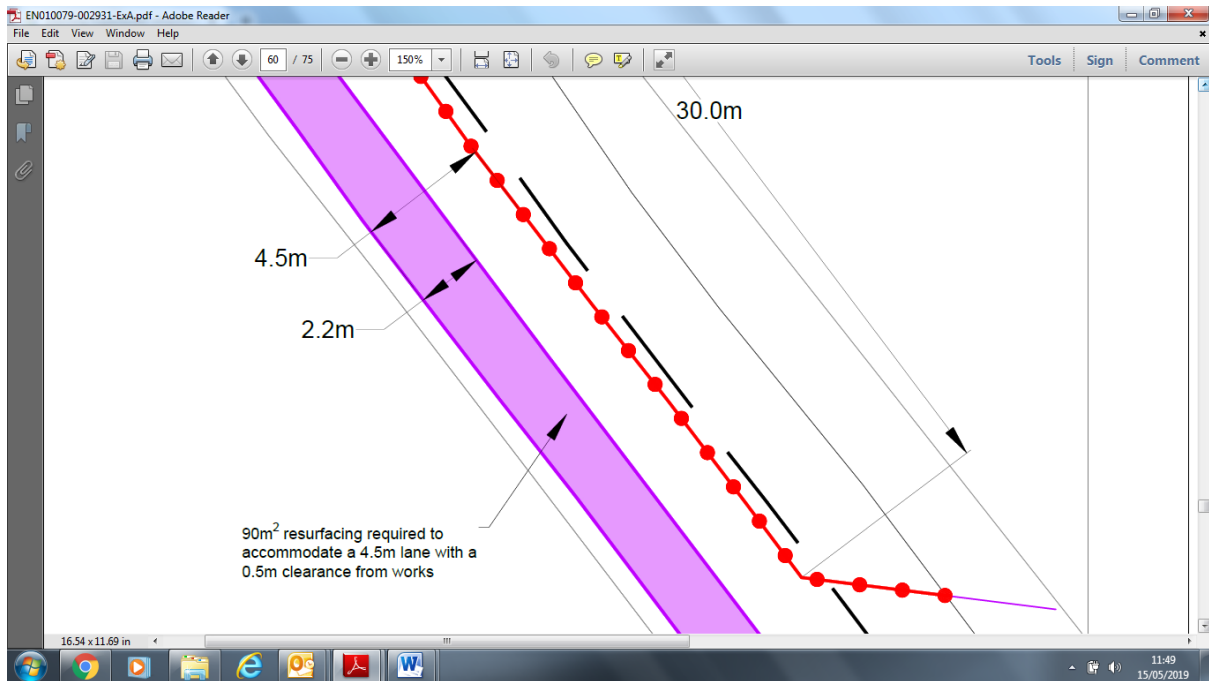
Table 2 shows PM10 emissions for the Turkey farm



OPC questions whether the levels of PM10 emissions from the intensive turkey farm, plus the addition of assessed cumulative traffic and dust from construction materials would be within the objective of annual PM10 40 µg/m3?

Trenching of B1149

OPC note that the applicants propose to create a single lane width of 4.5m this is to accommodate abnormal loads. To achieve this 2.2m will be needed to widen the road. This appears to give 0.1m margin for error as the cable drums for HOW3 will be 4.4m wide; this also does not take into consideration large and wide agricultural vehicles.



Extract from: Hornsea Three Appendix 28 to DL7 - Cumulative Link Impact Assessment Relating to Traffic: Oulton and Cawston March 2019

*The temporary impact of the construction work may affect hazardous, dangerous and abnormal indivisible loads as stated in paragraphs 7.11.2.73 and 74 of the ES, it is expected that, for Hornsea Three, some Abnormal Indivisible Loads (AILs) would be associated with cable drum movements to the onshore cable corridor and Oulton Compound.**Regarding Link 208, the total number of cable drum movements associated with the construction of Hornsea Three is 1,121, which would affect The Street twice as they would enter the compound from source and then leave again to the relevant cable section. The maximum number of abnormal loads for Link 208 is therefore 2242 total abnormal load movements***

Then goes on to state.....

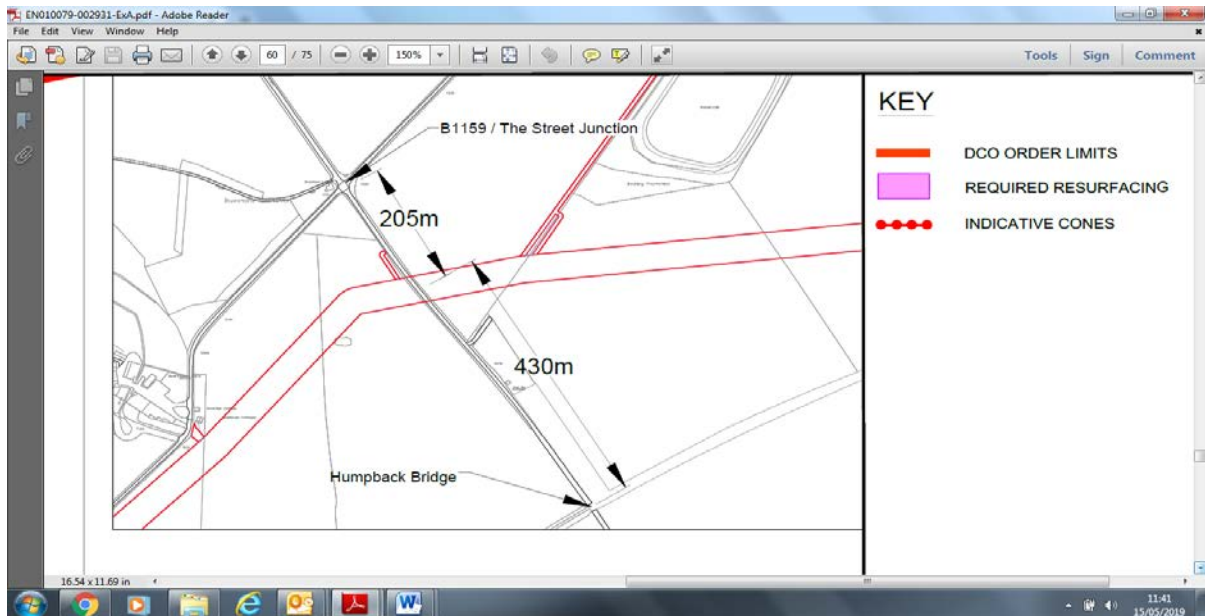
Sensitivity of the Receptor

The access used by the abnormal indivisible load would be access to ensure the route is of a standard to accommodate the transport delivery vehicles. Any restrictions would also necessarily be removed to accommodate the transport delivery vehicles and they would travel under controlled environments. The passage of abnormal indivisible loads would, however, lead to some limited driver delay as the loads would move slowly.

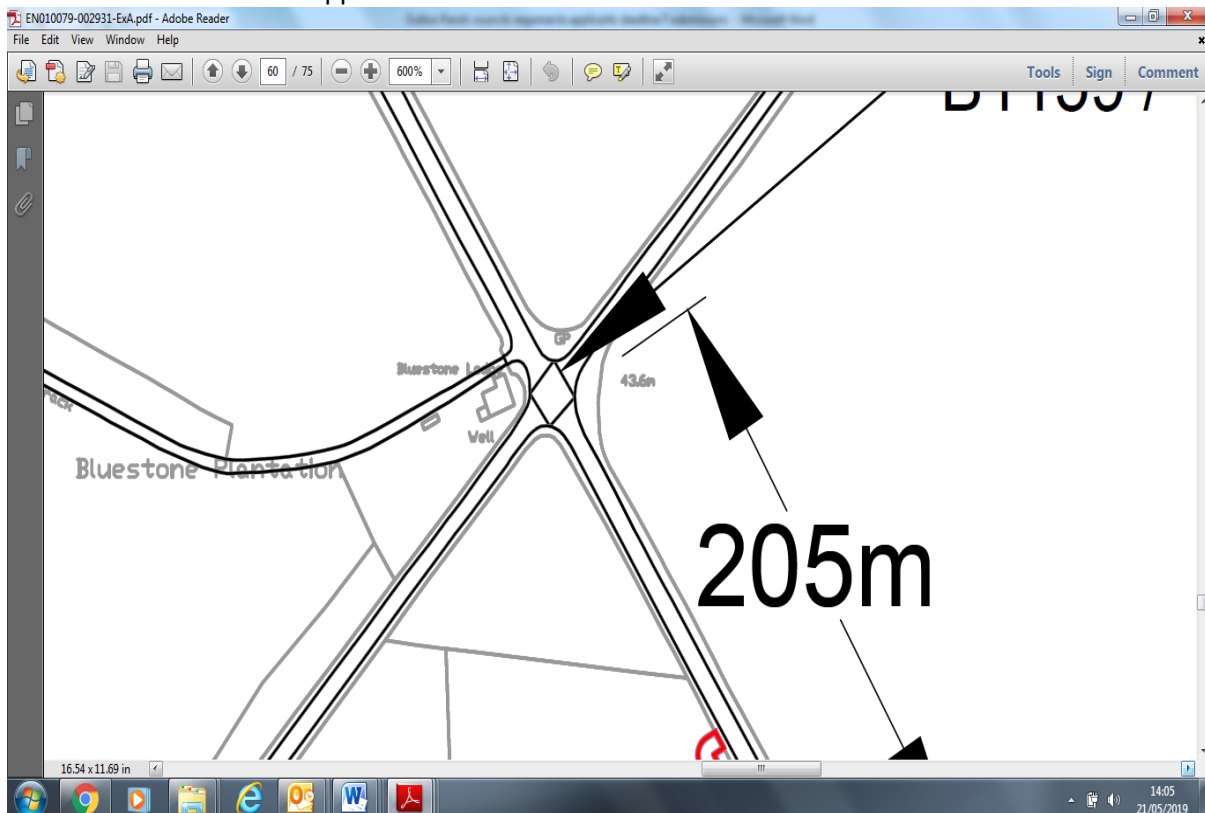
OPC questions whether the passage of AIL's would have to be curtailed during roadworks as it may be seen as a 'Restriction' and therefore deemed an unsuitable route?

The road layout below shows that there will be 205m between the Junction B1149/The Street and the road works. OPC observe that the road intervention scheme widening of the junction will result in a reduced distance due to the Bellmouth entrance at the junction. It appears that the plan used

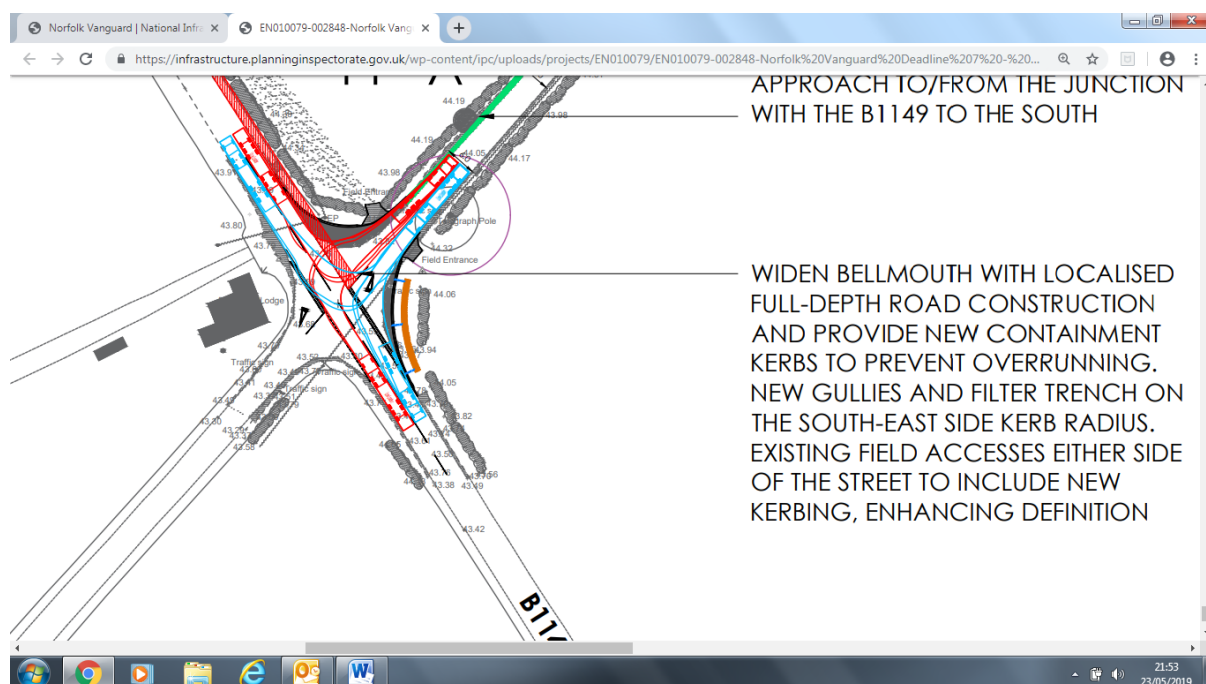
does not include the modifications. OPC also question whether the traffic works during trenching will result in tail backs at the junction and to the hump back bridge on B1149 especially if there are ALL arriving and departing from HOW3 Main Compound. OPC have already highlighted this issue in regard to the VISSIM modelling and the very real dangers this would present.



Junction appears to be shown without the bellmouth modifications.



Road intervention scheme bellmouth junction The Street/B1149



Conclusion and OPC position re Statement of Common Ground (SOCG)

OPC have participated in all aspects of the examination process and believe they have highlighted the very real concerns and issues. These have been acted upon by the ExA and the applicants in an effort to seek clarification. Oulton finds itself in the unique position of not just one project but two projects which will impact one property directly as well as the wider community. Oulton will be impacted by both Link 68, the villages' access to The Street/B1149 Holt and Norwich, and Link 75 the villages access to Blickling Road and Aylsham.

OPC reiterate that they support offshore wind but that the current onshore disruption proposed by Vattenfall & Orsted by construction traffic and cable routes crossing Norfolk and the way in which National Grid allocates connection points needs to be fundamentally reviewed. These two projects highlight the problem of connection points. A more direct route needs to be found, such as the use of an offshore ring main. The increasing need to add offshore wind to the UK energy mix appears to be aimed disproportionately at the East coast of England. Norfolk therefore can expect further disruption in the future unless better solutions can be found. Is it reasonable to expect that one part of the country should experience so much disruption?

Oulton Parish Council have also determined that signing any form of SOCG with the applicant does not add anything meaningful to the planning process, and could, in future be misinterpreted as it having reached an acceptance of the project, should it proceed. The council have therefore declined to do so and have advised the applicant of its decision.

Appendix 1 current permit details for Intensive Turkey Farm.....

DP3632YL Variation and Consolidation.pdf - Adobe Reader

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Status log of the permit

Description	Date	Comments
Application EPR/HP3033UW/A0001	Duly made 29/01/07	Application for an intensive farming poultry installation permit.
Schedule 4 Notice response received	25/05/07	
Schedule 4 Notice response received	18/06/07	
Additional information received	16/07/07	
Permit determined EPR/HP3033UW	24/08/07	Permit issued to Bernard Matthews Foods Limited.
Application reference EPR/HP3033UW/V002	Duly made 22/10/10	Application to vary the permit to increase the animal numbers up to 132,000 turkey places.
Variation issued EPR/HP3033UW	02/11/10	Varied permit issued.
Application reference EPR/HP3033UW/V003	Duly made 18/11/13	Application to vary the permit to include biomass boilers.
Variation issued EPR/HP3033UW/V003	10/12/13	Varied and consolidated permit issued in modern condition format.

1305
27/05/2019