



Norfolk Vanguard Offshore Wind Farm

Norfolk Vanguard Limited

Oulton Parish Council
Position Statement –
Reducing Impacts of
Construction Traffic

Applicant: Norfolk Vanguard Limited

Document Reference: ExA; AS; 10.D8.19

Date: 30 May 2019

Author: Royal HaskoningDHV

Photo: Kentish Flats Offshore Wind Farm





Date	Issue No.	Remarks / Reason for Issue	Author	Checked	Approved
29/05/2019	01D	First draft for Norfolk Vanguard Limited review	CJ/CC	RS	RS
29/05/2019	02F	Deadline 8 submission	СС	RS	RS





Table of Contents

1	Introduction		
_			
Statement o	of Common Ground as sent to Oulton Parish Council on 18 th April 2019	2	





Glossary

HVDC	High Voltage Direct Current	
OPC	Oulton Parish Council	
PC	Parish Council	
SoCG	Statement of Common Ground	





1 INTRODUCTION

- 1. The Applicant has been in on-going discussions with Oulton Parish Council (OPC) throughout the examination in order to progress matters of concerns as raised by the Parish Council (PC) in their Relevant Representations. In fact, the Applicant had been liaising with the PC, including through direct contact and presentations several months prior to the start of the examination process. Early exchanges covered Project updates and an exploration of matters of local interest and potential concern, including traffic matters.
- 2. A first draft of a Statement of Common Ground (SoCG) between the Applicant and OPC was submitted to the examination at Deadline 1 (Rep 1 SOCG 23.1).
- 3. Since this time, the Applicant and OPC have engaged through written communication and working group meetings (early February and again late March) on matters initially captured in the draft (SoCG) submitted at Deadline 1 (Rep 1 SOCG 23.1). The purpose of the most recent meetings was for the Applicant to hear directly from Oulton Parish Council their concerns about the Project and those of local residents, to explain the embedded mitigation contained within the Project, as well as to reflect together on issues which as a result of enhanced mutual understanding could be resolved, and to explore those issues which continued to concern Oulton PC. It was hoped remaining issues might be progressed with a view to reaching common ground. An updated version of the SoCG was subsequently sent to the PC on 18th April 2019, and forms Appendix 1 of this document.
- 4. While discussions were greatly appreciated by both parties, and Oulton PC acknowledge the Applicant's strategy to install ducts for both projects and the decision to commit to High Voltage Direct Current (HVDC) will reduce impacts to residents, there remain concerns among residents of Oulton Parish, with respect to the cumulative traffic from both projects, which representatives of OPC maintain will be "hugely impactful on the residents of The Old Railway Gatehouse and the wider community for a protracted period". Therefore, OPC have communicated that they do not wish to proceed with a joint SoCG with the Applicant
- 5. This document is therefore submitted by the Applicant as its position statement to note where significant efforts have been made by the Applicant to address concerns of OPC during the examination, however this document is not to be considered a joint document with OPC as noted above.
- 6. It is understood by the Applicant that OPC will be making a separate submission to the examination at Deadline 8.





STATEMENT OF COMMON GROUND AS SENT TO OULTON PARISH COUNCIL ON 18TH APRIL 2019





Norfolk Vanguard Offshore Wind Farm

Statement of Common Ground

Oulton Parish Council







Date	Issue No.	Remarks / Reason for Issue	Author	Checked	Approved
16/11/2018	01D	First draft for Norfolk Vanguard Limited review	СС	ST	JA
07/12/2018	02D	Draft for submission to Oulton PC	ST	JA	JA
16/04/2019	03D	Draft for submission to Oulton PC	JA	СС	RS





Table of Contents

1	Introduction	1
1.1	The Development	1
1.2	Consultation with Oulton Parish Council	2
2	Statement of Common Ground	5





Glossary

СоСР	Code of Construction Practice	
DCO	Development Consent Order	
EIA	Environmental Impact Assessment	
ES	Environmental Statement	
LVIA	Landscape and Visual Impact Assessment	
OCoCP	Outline Code of Construction Practice	
OLEMS	Outline Landscape and Environmental Management Strategy	
OWF	Offshore Wind Farm	
PEIR	Preliminary Environmental Information Report	
SoCG	Statement of Common Ground	

Terminology

Landfall	Where the offshore cables come ashore at Happisburgh South
Mobilisation area	Areas approx. 100m x 100m used as access points to the running track for duct installation. Required to store equipment and provide welfare facilities. Located adjacent to the onshore cable route, accessible from local highways network suitable for the delivery of heavy and oversized materials and equipment.
National Grid overhead line modifications	The works to be undertaken to complete the necessary modification to the existing 400kV overhead lines
Necton National Grid substation	The existing 400kV substation at Necton, which will be the grid connection location for Norfolk Vanguard
Offshore accommodation platform A fixed structure (if required) providing accommodation for offshore personnel. An accommodation vessel may be used instead	
Offshore cable corridor	The area where the offshore export cables would be located.
Offshore electrical platform	A fixed structure located within the wind farm area, containing electrical equipment to aggregate the power from the wind turbines and convert it into a more suitable form for export to shore.
Offshore export cables	The cables which bring electricity from the offshore electrical platform to the landfall.
Onshore cable route	The 45m easement which will contain the buried export cables as well as the temporary running track, topsoil storage and excavated material during construction.
Onshore project substation	A compound containing electrical equipment to enable connection to the National Grid. The substation will convert the exported power from HVDC to HVAC, to 400kV (grid voltage). This also contains equipment to help maintain stable grid voltage.





The OWF sites	The two distinct offshore wind farm areas, Norfolk Vanguard East and Norfolk Vanguard West.
Trenchless crossing zone (e.g. HDD)	Temporary areas required for trenchless crossing works.





1 INTRODUCTION

- This Statement of Common Ground (SoCG) has been prepared by the Applicant to set out the areas of agreement and disagreement with Oulton Parish Council in relation to the Development Consent Order (DCO) application for the Norfolk Vanguard Offshore Wind Farm (hereafter 'the project') based on consultation to date. Norfolk Vanguard Limited and Oulton Parish Council are continuing to engage through written communication and working group meetings with small numbers of each party.
- This SoCG comprises an agreement log which has been structured to reflect topics of interest to Oulton Parish Council in relation to the Norfolk Vanguard DCO application (hereafter 'the Application'). Points that are not agreed will be the subject of ongoing discussion wherever possible to resolve, or refine the extent of disagreement between the parties.

1.1 The Development

- 3. The Application is for the development of the Norfolk Vanguard Offshore Wind Farm (OWF) and associated infrastructure. The OWF comprises two distinct areas, Norfolk Vanguard (NV) East and NV West ('the OWF sites'), which are located in the southern North Sea, approximately 70km and 47km from the nearest point of the Norfolk coast respectively. The location of the OWF sites is shown in Chapter 5 Project Description Figure 5.1 of the Application. The OWF would be connected to the shore by offshore export cables installed within the offshore cable corridor from the OWF sites to a landfall point at Happisburgh South, Norfolk. From there, onshore cables would transport power over approximately 60km to the onshore project substation and grid connection point near Necton, Norfolk.
- 4. Once built, Norfolk Vanguard would have an export capacity of up to 1800MW, with the offshore components comprising:
 - Wind turbines;
 - Offshore electrical platforms;
 - Accommodation platforms;
 - Met masts;
 - Measuring equipment (LiDAR and wave buoys);
 - Array cables;
 - Interconnector cables; and
 - Export cables.
- 5. The key onshore components of the project are as follows:
 - Landfall;





- Onshore cable route, accesses, trenchless crossing technique (e.g. Horizontal Directional Drilling (HDD)) zones and mobilisation areas;
- Onshore project substation; and
- Extension to the existing Necton National Grid substation and overhead line modifications.

1.2 Consultation with Oulton Parish Council

Table 1 Consultation with Oulton Parish Council to date

Date	Contact Type	Topic
Pre-Application		
17 th October 2016	Notification (via letter and email) sent to the Parish Council	At the commencement of the Phase I consultation period (Scoping), the Parish Council was written to and invited to participate and attend the public exhibitions. A newsletter was issued alongside this mailing to inform the area of the consultation.
18 th October 2016	Non-Statutory Consultation Event	A non -statutory consultation event was held in nearby Aylsham Town Hall (2pm to 6.30pm).
6 th March 2017	Notification (via letter and email) sent to the Parish Council	At the commencement of the Phase II consultation period, the Parish Council was issued a notification, which included an invitation to attend the public exhibitions.
22 nd March 2017	Non-Statutory Consultation Event	A non -statutory consultation event was held in nearby Aylsham Town Hall (1pm to 7pm).
14 th October 2017	Letter/email issued to Parish Council (SoCC)	A letter was issued to the Parish Council notifying them of the publication of the SoCC, including information on where to access a copy, and top-level information about the forthcoming statutory consultation.
16 th October 2017	Newsletter issued	Alongside the letter issued to the parish council regarding the publication of the SoCC, a newsletter was distributed to the Parish Council, and the wider area notifying of the SoCC publication and forthcoming statutory consultation.
27 th October 2017	Letter issued (Section 42 Statutory Consultation Letter)	The Statutory consultation letter issued under section 42 was posted on 27 th October 2017 to the Parish Council notifying them of the formal consultation, where to access the PEIR and relevant documents, as well as how to provide feedback.
9 th November 2017	Statutory Consultation event	A statutory consultation event was held in their nearby Aylsham Town Hall (1pm to 7pm).
5 th December 2017	Statutory Consultation response received from the Parish Council	Oulton Parish Council's Statutory Consultation response to the PEIR was received and logged by the project team.





Date	Contact Type	Topic
22 nd February 2018	Email issued to Parish Council	An email was issued to the Parish Council offering a meeting to provide an update on the project following the close of statutory consultation and in conjunction with the publication of the Interim Consultation Report (Hearing Your Views III).
26 th February 2017	Email from Oulton Parish Council	An email was received with numerous questions about the project raised by the Parish Council.
1 st March 2017	Email to Oulton Parish Council	An email was issued responding to the questions raised in the email sent on 26 th February. Confirmation of attendance at the Parish Council meeting on 17 th April was also provided.
17 th April 2018	Meeting	A meeting organised following the close of statutory consultation to present a project update to the parish council.
18 th April 2018	Email to Oulton Parish Council	An email was sent to the Parish Council following the meeting the day before. The email contained a copy of the presentation slides from the meeting and an update on the issue of broadband provision to the area.
25 th April 2018	FAQ document issued	Following a review of questions posed since the close of statutory consultation, the FAQ document was updated and issued to the Parish Council.
Post-Application		
12 th September 2018	Letter from Oulton Parish Council	Relevant representation on the DCO application.
14 th November 2018	Email to Oulton Parish Council	An email to Oulton Parish Council requesting that they display the Norfolk Vanguard offshore wind farm notices "notification of preliminary meeting" and "Notification of open floor hearing" on the parish notice board from Friday, November 16 th 2018.
23 rd October 2018	Parish Council Meeting	Presentation and update.
6 th February 2019	Working group meeting	Discussion covering a number of concerns raised by the Parish Council as well as an overview of the project in the local area.
27 th March 2019	Working group meeting	Discussion covering a number of traffic concerns raised by the Parish Council.

- 6. contains the consultation that has taken place with Oulton Parish Council to date.
- Oulton Parish Council provided a relevant representation to the Planning
 Inspectorate on 12th September 2018, outlining the concerns of the parish council.
 The following sections outline the specific matters that have been agreed, as well as those which have not yet been resolved.





8. A draft timetable for the Examination was provided in the Rule 6 letter for the project which was issued by the Planning Inspectorate on 9 November 2018. This noted the deadline for submission of SoCGs as Deadline 1 on Monday 14 January 2019.

Table 1 Consultation with Oulton Parish Council to date

Date	Contact Type	Topic
Pre-Application		
17 th October 2016	Notification (via letter and email) sent to the Parish Council	At the commencement of the Phase I consultation period (Scoping), the Parish Council was written to and invited to participate and attend the public exhibitions. A newsletter was issued alongside this mailing to inform the area of the consultation.
18 th October 2016	Non-Statutory Consultation Event	A non -statutory consultation event was held in nearby Aylsham Town Hall (2pm to 6.30pm).
6 th March 2017	Notification (via letter and email) sent to the Parish Council	At the commencement of the Phase II consultation period, the Parish Council was issued a notification, which included an invitation to attend the public exhibitions.
22 nd March 2017	Non-Statutory Consultation Event	A non -statutory consultation event was held in nearby Aylsham Town Hall (1pm to 7pm).
14 th October 2017	Letter/email issued to Parish Council (SoCC)	A letter was issued to the Parish Council notifying them of the publication of the SoCC, including information on where to access a copy, and top-level information about the forthcoming statutory consultation.
16 th October 2017	Newsletter issued	Alongside the letter issued to the parish council regarding the publication of the SoCC, a newsletter was distributed to the Parish Council, and the wider area notifying of the SoCC publication and forthcoming statutory consultation.
27 th October 2017	Letter issued (Section 42 Statutory Consultation Letter)	The Statutory consultation letter issued under section 42 was posted on 27 th October 2017 to the Parish Council notifying them of the formal consultation, where to access the PEIR and relevant documents, as well as how to provide feedback.
9 th November 2017	Statutory Consultation event	A statutory consultation event was held in thein nearby Aylsham Town Hall (1pm to 7pm).
5 th December 2017	Statutory Consultation response received from the Parish Council	Oulton Parish Council's Statutory Consultation response to the PEIR was received and logged by the project team.
22 nd February 2018	Email issued to Parish Council	An email was issued to the Parish Council offering a meeting to provide an update on the project following the close of statutory consultation and in conjunction with the publication of the Interim Consultation Report (Hearing Your Views III).





Date	Contact Type	Topic
26 th February 2017	Email from Oulton Parish Council	An email was received with numerous questions about the project raised by the Parish Council.
1 st March 2017	Email to Oulton Parish Council	An email was issued responding to the questions raised in the email sent on 26 th February. Confirmation of attendance at the Parish Council meeting on 17 th April was also provided.
17 th April 2018	Meeting	A meeting organised following the close of statutory consultation to present a project update to the parish council.
18 th April 2018	Email to Oulton Parish Council	An email was sent to the Parish Council following the meeting the day before. The email contained a copy of the presentation slides from the meeting and an update on the issue of broadband provision to the area.
25 th April 2018	FAQ document issued	Following a review of questions posed since the close of statutory consultation, the FAQ document was updated and issued to the Parish Council.
Post-Application		
12 th September 2018	Letter from Oulton Parish Council	Relevant representation on the DCO application.
14 th November 2018	Email to Oulton Parish Council	An email to Oulton Parish Council requesting that they display the Norfolk Vanguard offshore wind farm notices "notification of preliminary meeting" and "Notification of open floor hearing" on the parish notice board from Friday, November 16 th 2018.
23 rd October 2018	Parish Council Meeting	Presentation and update.
6 th February 2019	Working group meeting	Discussion covering a number of concerns raised by the Parish Council as well as an overview of the project in the local area.
27 th March 2019	Working group meeting	Discussion covering a number of traffic concerns raised by the Parish Council.





2 STATEMENT OF COMMON GROUND

9. Oulton Parish Council has made a number of submissions throughout the examination covering a range of topics. The issues raised within these submissions have been captured in the table below to provide an understanding of the current position of both parties. The final column identifies the final position of the parties.





Table 2 Key issues raised in the relevant representation

Norfolk Vanguard Limited Position	Oulton Parish Council Position	Final Position
Project Description		
The co-location of Norfolk Vanguard and Norfolk Boreas, and the construction strategy to install Norfolk Boreas ducts during construction of Norfolk Vanguard, as well as the selection of High Voltage Direct Current (HVDC) technology, reduces the length of time of construction at any one area. If both projects progress; this will reduce the construction time for the projects and the impact on residents.	Agreed	It is agreed by both parties that the strategy to install ducts for both projects and the decision to commit to HVDC will reduce impacts to residents.
The first stage of onshore construction works is cable duct installation, which will be conducted in a sectionalised approach in order to minimise impacts via mobilisation areas (see Appendix 1).	The Cable Logistic Area is only mentioned on maps, no data in any documents specifically describing its location, function or reason for selection. This area was a late addition and only appeared on final maps.	
Following the completion of the cable duct installation, mobilisation areas will be removed and the land reinstated. To support the subsequent cable pulling phase a cable logistics area will be located on Heydon Road, Oulton. This is an area of existing hard standing that will be utilised during the cable pulling phase. Cable drums required for the cable pull will be delivered either directly to the joint locations or temporarily stored at this cable logistics area prior to delivery to the joint locations.		
The cable logistics area would have the capacity to store approximately 20 cable drums. The Applicant confirmed with Oulton Parish Council on 27 March 2019 that the construction methodology requires cable drums to be delivered directly to the cable joints. A number of cable drums may be stored at the cable logistics area to act as a buffer however the intention is for the majority of cable drums to be delivered directly to the joint locations. The total number of cable drums required for the entire onshore cable route is approximately 360 which is set out in Appendix 24.4 of ES Chapter 24 Traffic and Transport.		
A description of the cable logistics area is provided within ES Chapter 5 Project Description at section 5.5.4, which provides sufficient information regarding the need for, and location of, the cable logistics area.		





Norfolk Vanguard Limited Position	Oulton Parish Council Position	Final Position
The consented working hours are 7am to 7pm Monday to Friday (a single 12 hour shift), and 7am to 1pm on Saturdays, which is secured through Requirement 26. Outside of these hours, compounds (mobilisation areas) will effectively be locked and will not accept HGVs. To prevent HGVs arriving at a locked compound (outside of the consented hours) control of HGV deliveries is set out at Section 1.6.3 of the Outline Traffic Management Plan (OTMP) (document reference 8.8). Control measures include: • HGV booking system - the booking system will enable a daily profile of deliveries to be maintained and allow the contractor to ensure that the required deliveries are regularly forecast and planned. Suppliers will be informed of the working hours and their booking slot and their supplier contracts will be based on adhering to these conditions. • Suppliers will be warned that HGVs will be refused access and turned away if they arrive outside of their allocated time slot. This is proposed as a deterrent to ensure suppliers adhere to this control mechanism. • A small number of daily slots will be reserved to accommodate any unplanned deliveries. • The contractor will be required to keep an up to date record of deliveries and exports from the project, this will take the form of delivery receipts. • Supply chain vehicles will display a unique identifier in the cab of the vehicle. Should there be any occasion where a supplier does not adhere to these requirements then enforcement action, through the supplier's contract, will be taken to prevent any further breach.	OPC are concerned about the potential for out of hours deliveries using Link 68.	
The Applicant has identified these control measures to give suppliers clear instruction that they are not to attempt to deliver to site outside of the consented working hours. The control measures are to ensure that delivery profiles remain within the agreed assessed parameters to manage construction traffic flows on the road network. If there are reports of vehicles arriving at site early and waiting nearby then enforcement action, through the supplier's contract, will be taken with that supplier. This procedure is set out in section 1.9.4 (Potential Plan Breaches) and section 1.9.5 (Corrective Process) of the OTMP, which is secured through Requirement 21 of the dDCO. Beyond this, the Applicant has also committed to a Communication Plan and a local liaison officer for any local residents who wish to raise concerns in relation		





Norfolk Vanguard Limited Position	Oulton Parish Council Position	Final Position
to traffic and construction management. This is set out at Section 2.4 of the Outline Code of Construction Practice (CoCP) (document reference 8.1) and is mirrored in section 1.9.2 of the OTMP. This identifies a mechanism by which complaints received during construction related to HGV deliveries can be responded to and, where required, enforcement action taken, through the supplier's contract. "A dedicated Norfolk Vanguard Limited local community liaison officer will respond to any public concerns, queries or complaints in a professional and diligent manner. Enquiries will be dealt with in an expedient and courteous manner. Any complaints will be logged, investigated and, where appropriate, rectifying action will be taken." Requirement 26 does allow for some works to take place beyond the consented construction hours for essential continuous activities, such as concrete pouring or cable pulling. For example, once drilling has begun it may not be appropriate to stop the drilling process until the installation is complete due to drill head pressures and other technical requirements. Any works that are identified as potentially requiring out of hours working will require prior agreement with the relevant planning authority, which is secured through Requirement 26(3). Any application for out of hours working would need to set out potential traffic requirements and expected noise levels at the nearest residential properties and appropriate mitigation as required.		
Traffic and Transport Cumulative Impact Assessment (CIA)		
Appendix 1 of this SoCG provides a summary of the information presented as part of the application, specifically in relation to construction activities and construction traffic near Oulton. The proposed use of The Street (up to the southern end of Oulton Street) and Heydon Road at Oulton (Link 68) is required to access a single mobilisation area (MA7) and is also required during the cable pulling phase. MA7 is only required to support the duct installation works in proximity to Oulton, and will be removed and the land reinstated following the completion of that phase. Duct installation works are programmed to last for 37 weeks in 2022 and 18 weeks in 2023, although peak traffic numbers on Link 68 are limited to 16-22 weeks during this period (see Appendix 1.). Baseline traffic using Link 68 was estimated for the assessment submitted for Norfolk Vanguard. Automatic Traffic Count (ATC) data was subsequently	Link 68 only seems to refer to traffic to Mobilisation Area and cable route - traffic to and from Cable Logistic Area is not mentioned in DCO documents. One residential property in particular will be impacted directly by both Norfolk Vanguard and Hornsea Project Three, being next to the entrance to Saltcarr Farm and directly alongside the proposed shared access route for both projects - the southern end of Oulton Street. This impact has not been assessed. This property was highlighted in a planning appeal, alongside the	





Norfolk Vanguard Limited Position	Oulton Parish Council Position	Final Position
collected by Hornsea Project Three along this Link 68. The Applicant has reviewed this dataset and can confirm that the numbers reported from the ATC survey do not significantly differ from the estimates used within the Applicant's assessment.	unsuitability of 'The Street' to cope with large volumes of HGVs. Appeal Ref: APP/K2610/A/14/2212257 .	
Construction traffic associated with the cable logistics area is considered as part of the cable pulling works. During this phase cable drums will be delivered directly to each cable joint location (approximately every 800m along the onshore cable route). Cable drums required for the cable pull will be delivered either directly to the joint locations or temporarily stored at this cable logistics area prior to delivery to the joint locations (further details in earlier rows of this table). During the cable pull peak traffic demand along Link 68 is up to 64 daily HGV movements for approximately 10 weeks during 2024.		
Construction traffic impacts along the Street (up to the southern end of Oulton Street) are fully considered for Norfolk Vanguard alone within the application documents. The Applicant has subsequently undertaken a cumulative impact assessment of the combined construction traffic from Norfolk Vanguard and Hornsea Project Three along Link 68, which was submitted to the examination at Deadline 5 (ExA; ISH1; 10.D5.3). This includes an assessment of noise, vibration and air quality impacts.		
The scheme of mitigation proposed by Hornsea Project Three (and agreed with Norfolk County Council) on Link 68 includes re-grading the road surface and introducing a temporary speed limit, which also serves to provide noise reductions. This mitigation scheme has been reviewed by the Applicant and will reduce traffic related noise impacts to negligible in the cumulative scenario. The Applicant has therefore committed to also adopt this scheme of mitigation. The first project to proceed to construction would deliver the full scheme of mitigation and the second project would be responsible for removing the measures once both projects' construction phases are complete.		
The construction traffic numbers reported on Link 68, as defined in Appendix 24.7, include both traffic for the duct installation works and the cable pulling phase (including use of the cable logistics area) and represent a robust basis for the assessment of potential impacts on Link 68. Peak traffic demand for both the duct installation and cable pulling phases is presented within Appendix 24.7 of ES Chapter 24 Traffic and Transport (DCO document 6.2).		
Road safety was assessed following a two-stage approach:	Vattenfall PIC (Personal Injury Collison) data did not include B1149. Orsted Hornsea Three used	





Norfolk Vanguard Limited Position	Oulton Parish Council Position	Final Position
 Stage 1 - Personal Injury Collision (PIC) data was obtained from open source data (www.crashmap.co.uk) covering the most recent three-year period (2014-2016). Collision clusters were identified following a threshold approach. The threshold was defined according to Norfolk County Council's criteria of "five PICs occurring within a three-year period in a 50m radius for built up areas and 100m radius for non-built up areas" Stage 2 – Further detailed accident data was obtained from Norfolk County Council at each of these clusters. This approach was agreed with Norfolk County Council as Highways Authority and is set out in detail within ES Chapter 24 Traffic and Transport section 24.6.4 (DCO document 6.1). 	PIA (Personal Injury Accident) data, which included sections of B1149, indicating that accidents were 25% higher than the national average. It would appear that the two projects, although accessing the same road routes, are neither assessing the same data, nor in the same way.	
Data for the B1149 approaching Oulton was obtained at Stage 1, however, the total number of collisions did not exceed the criteria as defined by Norfolk County Council. The Applicant has subsequently undertaken a cumulative impact assessment of the combined construction traffic from Norfolk Vanguard and Hornsea Project Three, which was submitted to the examination at Deadline 5 (ExA; ISH1; 10.D5.3). This includes an updated assessment of collision risk associated with cumulative traffic.		
The Applicant has undertaken a cumulative impact assessment of the combined construction traffic from Norfolk Vanguard and Hornsea Project Three along Link 68, which was submitted to the examination at Deadline 5 (ExA; ISH1; 10.D5.3). This includes an assessment of noise, vibration and air quality impacts. The scheme of mitigation proposed by Hornsea Project Three (and agreed with Norfolk County Council) on Link 68 includes re-grading the road surface and introducing a temporary speed limit, which also serves to provide noise reductions. This mitigation scheme has been reviewed by the Applicant and will reduce traffic related noise impacts to negligible in the cumulative scenario. The Applicant has therefore committed to also adopt this scheme of mitigation. The first project to proceed to construction would deliver the full scheme of mitigation and the second project would be responsible for removing the measures once both projects' construction phases are complete. The Applicant acknowledges that the cumulative air quality impact assessment submitted at Deadline 5 was based on the previously agreed air quality receptors in proximity to the	OPC are still unaware of how Norfolk Vanguard's cable route/mobilisation zone/cable logistic area and Orsted Hornsea Three Main Construction Compound at Oulton will interact with each other, given that they will be using the same access route B1149/The Street. The cumulative impact from traffic created by the two projects and its interaction with existing agricultural traffic, local businesses, tourists going to Blickling Hall and local residents has not been assessed. The rural road network in Oulton is already stretched almost to breaking point with the very large scale (both in vehicle size and volume) of existing agricultural traffic.	





Norfolk Vanguard Limited Position	Oulton Parish Council Position	Final Position
shared road links and did not explicitly include a property along The Street. The Applicant has re-run the air quality model separately for this property and can confirm that based on the worst case cumulative construction traffic numbers potential air quality impacts from vehicle emissions are negligible along The Street. The Applicant is happy to share the detail of this assessment with Oulton Parish Council. The submitted cumulative impact assessment for Link 68 represent a robust basis for the assessment of potential impacts on Link 68.	Vattenfall has used Orsted Hornsea Three PEIR [Preliminary Environmental Information Report] documents to assess cumulative impacts, but Oulton's Main Compound did not appear in those PEIR documents. (Orsted have still not fully assessed this area nor put together a CTMP [Construction Traffic Management Plan].) There is a lack of information on the cumulative impact of Norfolk Vanguard and Orsted Hornsea Three projects on residents of Oulton regarding noise, traffic, air quality etc.	
A Communication Plan will be developed and included as part of the final CoCP submitted post-consent and secured in the DCO. The outline approach is set out in the Outline CoCP (document reference 8.1) which states that Norfolk Vanguard Limited will ensure effective and open communication with local residents and businesses that may be affected by noise or other amenity aspects caused by the construction works. Communications will be co-ordinated on site by a designated member of the construction management team. A proactive public relations campaign will be maintained, keeping local residents informed of the type and timing of works involved, paying particular attention to potential evening and night time works and activities which may occur in close proximity to receptors. A combination of communication mechanisms such as posters and parish meetings will be employed to keep local residents informed.	OPC want the Applicant to confirm that communication with Orsted and affected businesses will take place. With particular refence to agri-businesses that are present in the area such as EF Harrold and Aylsham Growers.	
The Communication Plan will also set out the process of continued engagement between the Norfolk Vanguard, Hornsea Project Three and the Local Highway Authority. This will ensure that as construction programmes are refined post-consent that this information is regularly shared between parties, particularly traffic demand on shared road links and that commitments to manage cumulative construction traffic demand are fully delivered; for example on a given road the two projects may have committed to programme works that ensure each scheme's peak traffic does not overlap. With these commitments in place there will be sufficient control to ensure that		
that ensure each scheme's peak traffic does not overlap. With these commitments in place there will be sufficient control to ensure that disruption to the road network can be mitigated to a tolerable level.		





Norfolk Vanguard Limited Position	Oulton Parish Council Position	Final Position
Where the onshore cable route crosses any roads using open cut trenching methods, traffic management would be employed. Where appropriate, single lane operation of roads would be utilised during installation with signal controls to allow movements to continue. Whilst the width of the B1149 is less than 7.2m kerb to kerb (required for single lane traffic management) the Applicant will introduce temporary widening at this location to ensure that single lane operation can be implemented during the road crossing.	There are concerns over the B1149 where the cable route crosses the road. Vattenfall have said they will not be using trenchless crossing (horizontal directional drilling) but will dig up the road to install their cabling. Orsted Hornsea Three will be using B1149 at potentially the same time. How will a CTMP work around this?	
The detailed installation method for each crossing utilising traffic management would be agreed with the Norfolk County Council as highways authority prior to works beginning. An OTMP (DCO document 8.8) has been submitted with the DCO application and will form the basis for the final, detailed Traffic Management Plan (TMP), which will be submitted and approved by the local planning authority in consultation with Norfolk County Council as Highways Authority. These commitments are secured through Requirement 21 and 22 of the draft DCO respectively.		
The B1149 was not identified as a road that required a trenchless crossing based on existing and proposed traffic flows, however, Norfolk County Council (NCC) has subsequently requested that trenchless crossing techniques be considered. The Applicant is undertaking an exercise reviewing the proposed traffic flows on that link to inform whether an open cut trench solution is still appropriate in this location. This exercise also considers the design specification of the reinstated road taking into account the temporary increase in cumulative construction traffic on the reinstated surface, which was also raised as a concern by NCC. The Applicant is engaging NCC's Pavement Laboratory to analyse the current condition of the B1149 to inform a specification for future reinstatement.		
With these commitments in place there will be sufficient controls to ensure that disruption to the road network will be mitigated to a tolerable level.		
Link 75 has been identified in the Outline Traffic Management Plan (OTMP) (DCO doc: 8.8) as requiring mobile traffic management (pilot vehicles). The OTMP highlights that "some localised carriage widening may be required", i.e. the introduction of passing places where required to facilitate the proposed approach.	OPC queries how a 'pilot vehicle' strategy will work along this heavily used link road between Aylsham and North Norfolk. This link is of some considerable length with few obvious off road pull-ins or turning spaces. There are a number of large agribusinesses operating along this route and it is a significant feeder route to Blickling	





Norfolk Vanguard Limited Position	Oulton Parish Council Position	Final Position
	Hall. The Blickling Road is notorious for consistent and numerous accidents along it, not all reported, but noted by local residents.	
Archaeology and Cultural Heritage		
Potential impacts on Blickling Conservation Area are considered in full within ES Chapter 28 Onshore Archaeology and Cultural Heritage, and its location is shown on Figure 28.1.	Blickling Conservation Area is missing from map 'Policies and designations (map 4)' within the land use and agriculture chapter.	



The undersigned agree to the provisions within this SOCG

	·
Signed	
Printed Name	
Position	
On behalf of	Oulton Parish Council
Date	

Signed	
Printed Name	Rebecca Sherwood
Position	Norfolk Vanguard Consents Manager
On behalf of	Norfolk Vanguard Ltd (the Applicant)
Date	10/01/2019