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Dear Sir/ Madam

Application by Orsted Hornsea Project Three (UK) Ltd for an order Granting Development Consent for the Hornsea Project Three Offshore Wind Fram. The ExA's Written Questions and Requests for Information NCC Identification No: 20020350.

Thank you for your letter of 9 October 2018.

Please find below answers to the highway elements of your request from Norfolk County Council in its capacity as Local Highway Authority. We have not made any reference or assessment of impact to Trunk Roads, for which you need to contact Highways England as strategic Highway Authority.

#### Qu 1.9.4 (page 63) - Reinstatement of public rights of way

The OCoCP states that: "Any PRoW (public right of way) affected during the construction phase will be reinstated following completion of the works to ensure that no permanent effects remain" (paragraph 6.1.8.20). This is an important and necessary commitment. We would suggest that a process is put in place whereby the County Council's PRoW officers are notified when paths have been re-instated following closure or diversion to a standard to be agreed prior to the works, which may be on a case by case basis and which may include work outside of the working corridor, and so can confirm that the paths have been returned to an appropriate condition or can request additional remedial measures if necessary.

In our experience, after works to reinstate paths, there is often a period of 'settling' of materials. This can result in a variety of problems, such as sinking of infilled areas, or localised compaction leading to surface water/flooding. Where re-seeding of paths is necessary, establishment of grass can take some time. Given this, NCC would suggest that the OCoCP includes a commitment to a one-off survey of affected PRoW at a period of 6 months after completion of works and, in consultation with PRoW Officers, to take any remedial actions necessary to address issues resulting from the works.

# Qu 1.11.1 (Page 70) - Methodology and baseline data used to assess traffic movements - including outstanding issues.

NCC have no specific points to raise in respect to planning policy, baseline or assessment methodology, however the following points still need to be addressed:-

- We are waiting for a report from the developer in relation to impact upon the A140/B1113 junction. At this stage NCC do not anticipate a significant impact sufficient to warrant a recommendation of refusal (see below for more details).
- NCC maintains a holding objection on highway safety grounds until safe
  visibility at the permanent access point to the onshore HVAC Booster Station is
  clarified. An earth embankment in private ownership needs to be re-profiled. The
  developers have indicated they have the landowners consent for the works but the
  land required falls outside the area covered by the application. Accordingly NCC will
  require a legal agreement to protect the visibility splay in perpetuity prior to consent
  being issued.
- Abnormal loads will have to be made to the booster station, in particular for the delivery
  of transformers. As yet no assessment has been made to show that it is physically
  possible to deliver the transformers to the site. NCC will need to see a detailed route
  assessment prior to any attempt being made to deliver the abnormal loads, which can
  form part of the requirements under the CTMP.

## **Oulton Compound**

- The developers still need to confirm any cumulative impacts arising from all three wind farm projects utilising the same access route to the main compound at Oulton.
- NCC have reviewed an access strategy submitted by the developer and confirm that a
  possible option utilising passing places would be acceptable subject to the findings of a
  Stage 1 Safety Audit (RSA). In the meantime, until the RSA has been reviewed,
  NCC maintains its holding objection on highway safety grounds. Obviously, if the
  location for the compound were to change, then the developer would need to
  re-assess the impact upon all of the highway links.
- If following submission of the RSA the off-site works are found to be acceptable, NCC will require any such scheme to the roadway to be temporary in nature with a commitment provided to (i) maintain the works for the duration of the project and (ii) remove and re-instate the land upon completion. However, NCC will require any works at junctions and the removal of a road hump (close to the residential property along The Street) to be permanent.
- Given highway improvement works will take place adjacent to a residential property
  which may affect drainage, we also require the developer to indemnity NCC against
  any compensation claims made against NCC arising from these works eg under part 1
  of the Land Compensation Act.

- NCC would NOT accept an access solution to the Oulton compound that involves
  routing traffic through the village of Oulton due to safety concerns eg pedestrians
  using narrow residential roads with a lack of pedestrian footways would come into
  conflict with HGV's.
- Following removal of the road hump, priority signage will be required along part of the route. The CTMP will need to make provision for this to be made permanent at the end of the construction period if found to be necessary. This will be reviewed at the end of the construction phase.

#### Qu 1.11.14 A140/B1113 signalised junction already operating at capacity

This was raised at the focused consultation stage. There are two elements for consideration:-

- 1. Traffic turning left from the A140 onto the B1113 at the signalised junction will increase queue lengths along the A140 in the AM peak.
- 2. Traffic turning right from the B1113 onto the A140 will increase queue lengths on the B1113 in the PM peak.

We expect to control construction deliveries through the CTMP. Long term we do not foresee any issue with operational traffic. The only issue relates to traffic movements associated with the construction staff travelling to work.

We are waiting for a report from the developer in relation to impact upon the A140/B1113 junction but at this stage NCC do not anticipate a significant impact sufficient to warrant a recommendation of refusal. We expect to reduce the impact to an acceptable level via the CTMP.

## Qu 1.11.22 - Traffic management measures at access points with limited visibility.

NCC are satisfied that during construction, safety at temporary accesses can be controlled and managed through the CTMP. Temporary signage will be required in accordance with Traffic Signs Regulations and General Directions (TSRGD) as well as Temporary speed limits via Temporary Traffic Regulation Orders (TTRO's). The exact details can be confirmed within the CTMP.

#### Qu 1.11.25 - Outline CTMP

We recognise it is not possible to produce a full CTMP until such time as a contractor has been chosen. Accordingly we have no objection in principle to the developer submitting an outline CTMP at this stage. Overall we are satisfied impacts can be managed via the submission of a detailed CTMP in due course.

With regard to additions - we have set out specific requirements within the response to the individual questions covered elsewhere within this letter as a whole.

## Qu. 1.13.21 - Roads used as temporary working areas

The CTMP needs to make provisions to ensure residential access is maintained at all times and also measures for the control of mud/site debris to prevent it from being deposited onto the highway.

## Qu 1.13.23 - Timescale for access approval

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

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

Yours sincerely



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