



**National
Trust**

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7th November 2018

The Planning Inspectorate
Via email: HornseaProjectThree@pins.gsi.gov.uk

Dear Sir/Madam

Reference: EN010080

**Application by Orsted Hornsea Project Three (UK) Ltd for an Order Granting
Development Consent for the Hornsea Project Three Offshore Wind Farm**

Written Representation

Set out below is a Written Representation from the National Trust in respect of the above application.

The National Trust's Land Ownership & Interest

The National Trust was founded in 1895 as an independent charity to hold and manage, in perpetuity for the benefit of the nation, countryside and historic buildings in England, Wales and Northern Ireland. The Trust fulfils its statutory responsibilities as laid down in the National Trust Acts, through ownership and direct management of the properties in its care. It is within the remit of the National Trust to comment where development proposals affect our land or property, or other special places.

The proposal would not impact directly on land owned or managed by the National Trust, but the proposed main construction compound at Oulton Airfield would abut land owned by the National Trust. Copies of maps have been enclosed with this letter. The National Trust has significant landholdings in Norfolk which attract large numbers of visitors each year who come to enjoy the heritage, wildlife and leisure opportunities that they provide. In the vicinity of the proposed construction compound the National Trust owns part of Oulton Airfield, the Grade I Listed Blickling Hall and its Grade II* Registered Park & Garden. Blickling Hall is a hugely popular tourist visitor destination. The Trust's ownership also extends to the wider Blickling estate which includes land and property at Oulton Street village. Within the parish of Oulton the National Trust owns land to the north and east of the old airfield and lets a number of residential properties in the village including the Grade II Listed Malthouse

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Regional Chairman: Inga Grimsey
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Registered charity number 205846

Farmhouse. At Malthouse Farm the National Trust also provides accommodation for several small businesses including the National Trust Textile Conservation Studio. Concerns regarding the proposed compound are set out below.

Land at Oulton Street – Highway Impacts

It is understood that the main compound at Oulton Street would operate as a central logistics base for the onshore construction works, and would house the central offices, welfare facilities, and provide a security hub, central health and safety monitoring, and equipment stores, as well as acting as a staging post and secure storage for equipment and component deliveries.

It is noted that three other sites for the construction compound were discounted due to the adequacy of the access for heavy goods vehicles, distance from the strategic road network and absence of hardstandings. The Oulton Airfield location was put forward and chosen as the preferred option following the publication of the Preliminary Environmental Information Report (PEIR). It is stated that the chosen site has direct access from the B1149.

The airfield is located on 'The Street' which is accessed from the B1149, however, this is a rural road and the National Trust questions the appropriateness of this for use by the construction traffic. Information within the application estimates the potential number of vehicle movements at the main compound at Oulton Street, would equate to a peak of 130 daily staff vehicle movements and a peak of 118 daily HGV movements. The applicant also acknowledges that this is a "narrow single carriageway". Furthermore, as indicated in the submission, it is located approximately 3.5 km to the east of the main ECR.

The proposal may therefore result in a significant number of transport movements, including heavy goods vehicles, in a single day. Furthermore, construction could last a number of years. The submission indicates that under a two-phase programme scenario, the sum of the durations of each phase would not exceed eight years assuming gaps between the phases of up to 3 years. Under a single-phase construction programme, the total duration of the onshore cable corridor construction would not exceed six years. The increase in traffic and duration is likely to have an adverse impact upon the character of this narrow, rural road and result in disruption which would adversely impact upon the amenities of those who live in the village.

The applicant acknowledges that there are concerns regarding the use of this site specifically in terms of access but considers that these can be overcome through suitable traffic management measures. Details of such measures have not been included at this stage. It is stated that these measures will be developed as part of the subsequent Construction Traffic Management Plans (CTMPs) secured prior to the commencement of works and activities at the main compound, when the scope of the use of the main construction compound by the principal contractor is known. It is also stated that the traffic management measures may involve diversion routes. The National Trust is concerned about the impacts that the level of traffic using this rural road and the impacts the traffic

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management measures could have on its tenants, staff and visitors who use this road. The lack of detail and uncertainty at this stage about the traffic management measures gives cause for concern. The proposal also has the potential to cause disruption for a number of years.

Should this location be considered acceptable as a construction compound it is important that any construction traffic accessing this compound is aware that it should be accessed from the B1149 and not from a northerly direction where it would pass through the village and could adversely impact upon amenities.

Land at Oulton Street – Heritage Impacts

The National Trust's landholdings in the vicinity of the construction compound site are outlined above. In addition, Oulton Street village is within the designated boundary of the Blickling Conservation Area and as a key land and property owner the National Trust therefore plays an important role in upholding the historic integrity of the village as a designated heritage asset.

The compound would be located on part of the former RAF Oulton airfield which was one of 16 wartime built airfields in Norfolk used by the RAF during WWII. The former RAF Oulton is inextricably linked with Blickling Hall (Grade 1 Listed), which provided further accommodation for the RAF and was perhaps the most impressive country house in the county to serve as a mess site for an operational airfield. Within the estate stand a number of "temporary" buildings that provided accommodation for personnel including barrack blocks and the station cinema and gymnasium. Blickling also houses a museum dedicated to the units at RAF Oulton and is a pilgrimage for those that served there and their families. Many more people also visit the RAF Oulton museum at Blickling Hall each year and are interested to see more of what remains of the air base. The airfield is therefore already a valued heritage asset, albeit undesignated, and it is more than possible that appreciation of its significance will continue to increase over time. Appreciation of the value of heritage changes over time and WWII sites are still relatively undesignated despite representing a fascinating memorial to a hugely significant period of the history of our Country.

Unusually the three intersecting concrete runways of Oulton remain substantially intact, as does the perimeter track which encompassed them and provided access for the aircraft. With the exception of Foulsham near Fakenham, the runways and tracks at Oulton are the most complete surviving examples of a wartime built RAF airfield in the county. In terms of its surviving buildings again a similar number survive to those elsewhere including hangars. Operationally too, Oulton was unusual in that during 1944 a combined RAF and USAAF unit operated radio countermeasures from there.

Today only the fragmentary remains of RAF wartime built airfields survive, across East Anglia. None survive intact, but the Oulton airfield site, along with its domestic accommodation provides sufficient tangible evidence to appreciate the scale, and ingenuity of their construction and the operations undertaken from them.

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Oulton Airfield is therefore a significant if undesignated heritage asset and should be recognised as such. The airfield should not be looked upon as a negative influence on the overall character of the area but is an important part of the history of Oulton and Blickling.

Unfortunately the significance and character of the airfield, its historic relationship to the village and the Blickling estate and thus the contribution it makes to the setting of the Blickling Conservation Area have not been acknowledged within the application. The operation of this site as the main compound with the level of facilities and transport movements outlined above should be considered in the context of the historic environment but is absent from any assessment in Volume 3, Chapter 5 (Historic Environment) of the Environmental Statement.

There is reference to the comments of Norfolk County Council which states The extended accesses area includes the only surviving aircraft dispersal area associated with former Royal Air Force Oulton Airfield. The surviving Second World War concrete hard-standings should be retained and their form not altered. The same is true of the section of former runway intended for storage. The response to this by the applicant was that 'The comment is noted'. There is no evidence to suggest that the applicant has carried out a thorough appraisal to ensure any harm caused to the heritage asset of the airfield is minimised.

The National Trust is supportive of the need for renewable energy but in this particular case, we are concerned that the site chosen for the compound would cause harm to the undesignated heritage asset of the airfield and erode the ability to appreciate the contribution of the airfield to the historic environment, including its link with Blickling Hall. The proposed use of the site and scale of the operation would neither preserve nor enhance the character of designated Conservation Area. Furthermore, concern is raised that the B1149 is not capable of accommodating the transport movements proposed without an adverse impact upon other users of this road and the character of the area.

I would be grateful if the issues set out above would be taken into consideration when determining the application.

Yours faithfully

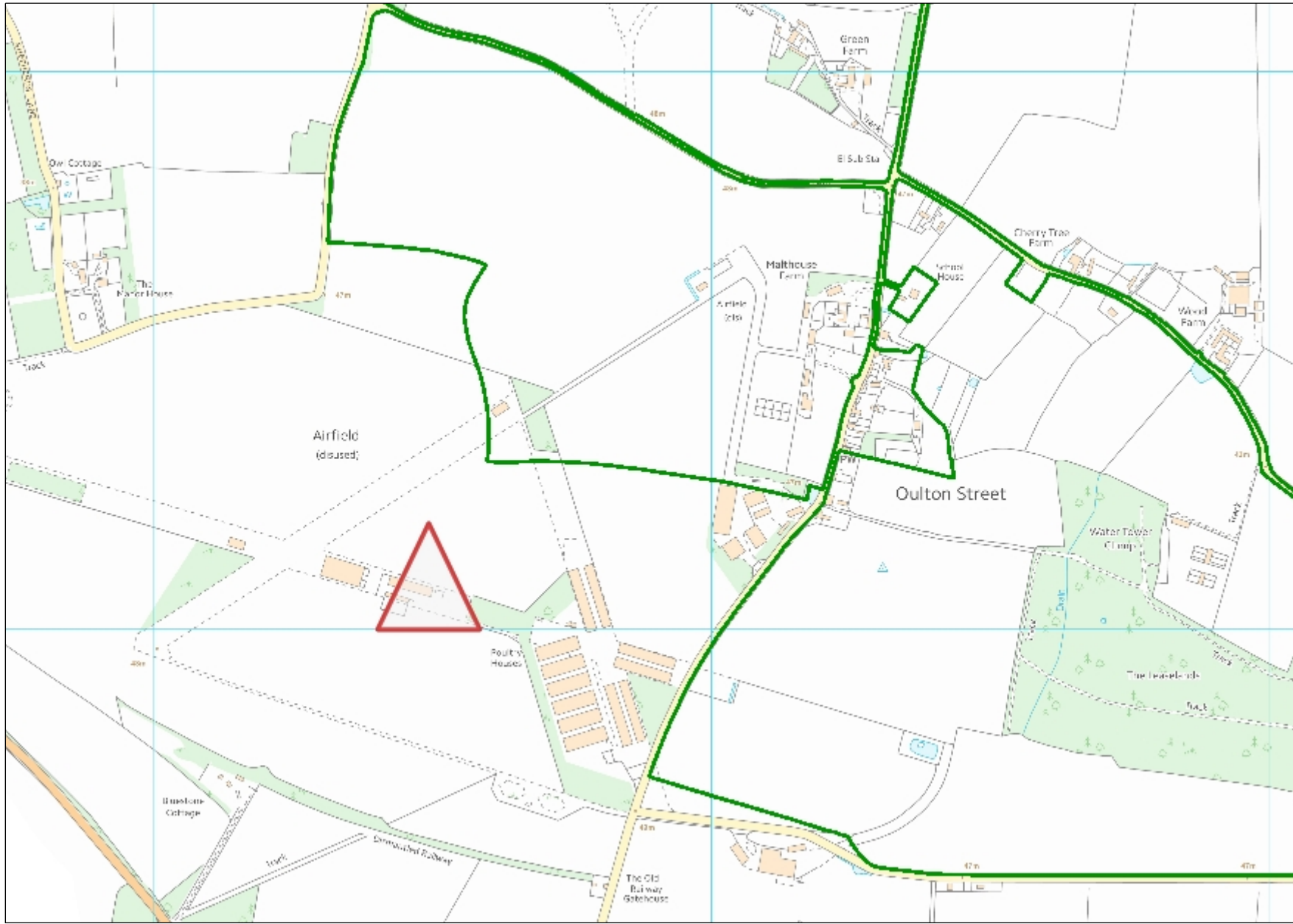
Nina Crabb

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Oulton Airfield & Blickling Estate



Legend

- ▲ Definitive Properties (GB)
- NT Ownership (GB)
- NT Leasehold (GB)
- △ Oulton Airfield

1: 10,000



0.4 0 0.20 0.4 Kilometers

British_National_Grid

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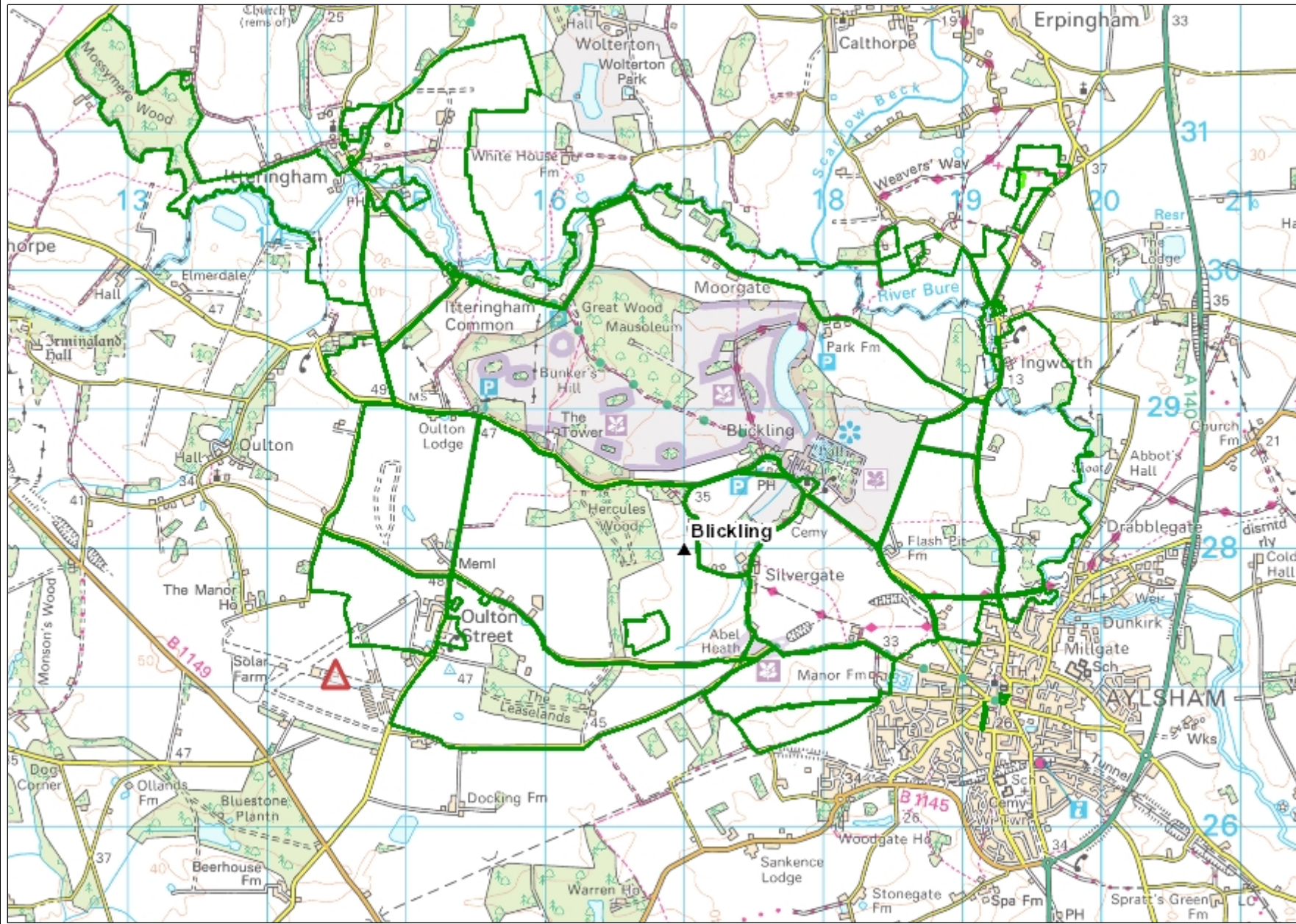
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Notes

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Oulton Airfield & Blickling Estate



Legend

- ▲ Definitive Properties (GB)
- NT Ownership (GB)
- NT Leasehold (GB)
- ▲ Oulton Airfield

1: 40,000



1.6 0 0.80 1.6 Kilometers

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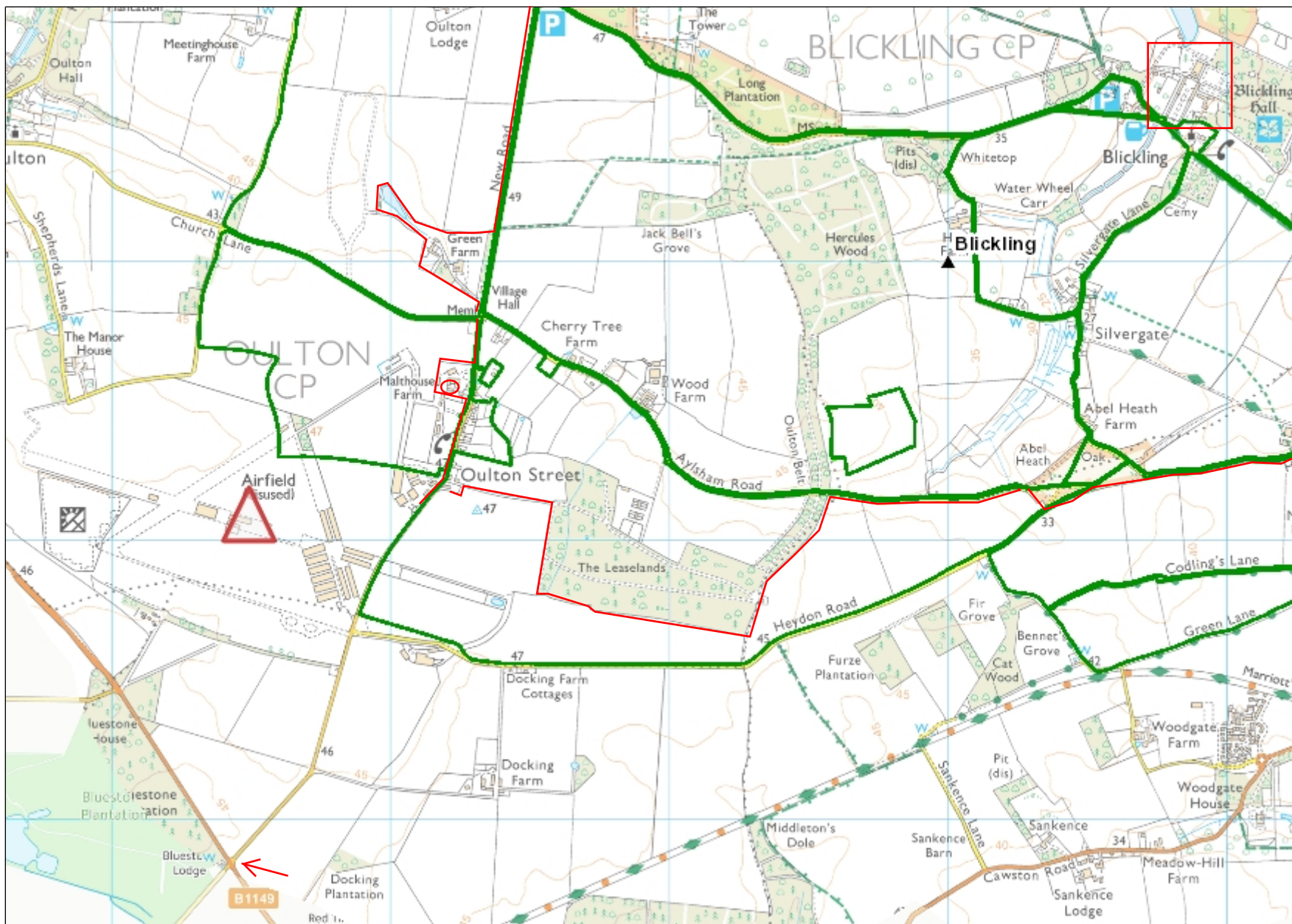
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Oulton Airfield & Blickling Estate



Legend

- ▲ Definitive Properties (GB)
- NT Ownership (GB)
- NT Leasehold (GB)
- △ Oulton Airfield
- Malthouse Farmhouse Grade II listed
- Blickling Hall Grade I listed
- ↖ Acces from B1143
- Conservation Area boundary

1: 20,000



0.8 0 0.40 0.8 Kilometers

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