



**National  
Trust**

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7<sup>th</sup> 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**

**Responses to ExA's Written Questions**

Set out below are the responses from the National Trust to the relevant ExA's Written Questions.

**Q1.8.8**

**Applicant, the National Trust (NT)**

**The NT [RR-056] refers to Oulton Airfield as a non-designated heritage asset.**

**Does the Applicant agree that Oulton Airfield is a non-designated heritage asset?  
Please can the Applicant and NT provide their respective assessments of the heritage  
significance of Oulton Airfield (including its association with the Grade I listed  
Blickling Hall) and the effects of the proposed construction compound on that  
significance.**

A construction compound is proposed at Oulton Street, which abuts the boundary of land owned by the National Trust. 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 the Grade 1 Listed Blickling Hall and its Grade II\* Registered Park & Garden. Blickling Hall is a hugely popular tourist visitor destination. The Trust's ownership extends to the wider Blickling estate which includes land and property at Oulton Street village. The National Trust owns part of Oulton Airfield and within the parish of Oulton the National Trust owns land to the north and east of the old airfield and lets a

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number of residential properties in the village including the Grade 2 Listed Malthouse Farmhouse. At Malthouse Farm the National Trust provides accommodation for several small businesses including the National Trust Textile Conservation Studio.

Due to the scale of the plan (No.35) within the 'Onshore Historic or Scheduled Monument Sites Plan' (PINS Document Reference: A2.8.2) the designated heritage assets close to the proposed compound are not identified or shown. The National Trust has included a map showing these with its Written Representation.

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 a valued heritage asset, albeit undesignated, and it is 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. Oulton has an interesting history being one of the few RAF airfields where RAF and USAAF units operated together.

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 set out 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.

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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 of the airfield is minimised.

The airfield should not be looked upon as a negative influence on the overall character of the area but as an important part of the history of Oulton and Blickling. The proximity of the airfield to the Blickling Estate contributes to the appreciation of the historic significance and is a tangible connection to the Estate. The significance of Oulton Airfield can be found in its historic interest. The Historic Environment Good Practice Advice in Planning: 2 states that “Historic interest is an interest in what is already known about past lives and events that may be illustrated by or associated with the asset” (Historic England, 2015). The use of the site as a compound, the associated infrastructure and the significant amount of transport movements would erode the ability to appreciate the contribution of Oulton Airfield to the historic environment. The use of the airfield in this way would mask the historic relationship and significance between the two places. Having regard to the construction period, this is likely to occur for a significant period of time.

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 heritage asset (undesigned) of the airfield which has strong links with Blickling Hall and the wider Blickling estate. The use of Oulton Airfield as a construction compound would neither preserve nor enhance the historic environment; it would only erode the ability to understand the historic connection.

Finally, there is a high potential for prehistoric settlement and ceremonial activity and also medieval activity associated with the early history of the local villages in this area. Should the proposal include any below ground activity in connection with the compound, a programme of archaeological work should be secured and any discoveries appropriately recorded. This would help to inform predictions for archaeological remains on the Blickling Estate, which will be of great importance in conjunction with the large piece of land being disturbed within the estate by the Norfolk Vanguard windfarm project.

#### **Q1.8.9**

**Applicant, Broadland District Council (BDC), NT**

**NT [RR-056] and BDC [RR-057] refer to the impact of the main construction compound on the Blickling Conservation Area.**

**The applicant, NT and BDC are requested to provide their respective assessments of the impact of the construction compound proposals on the setting and significance of the Blickling Conservation Area.**

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**Please can BDC also provide a plan showing the boundary of the conservation area.**

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 Conservation Area was designated on 1991 and extended in 2007 to include Malthouse Farm.

A conservation area is an area which has been designated because of its special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. The 'Blickling Conservation Area Character Appraisal' (Broadland Council, 2007) describes Blickling as one of a number of park or estate landscapes which occupy a belt between the rivers of Wensum and Bure North West of Norwich. It describes the surrounding land use as predominately arable with sinuous plantations around the park. It also states that the most historically interesting building in Oulton Street is Malthouse Farm (Grade II listed) and is one of the earliest surviving buildings in the area. The farmstead was absorbed into the Blickling Estate in the eighteenth century. In addition, it states that the character of the Conservation Area is heavily influenced by the presence of Blickling Park.

Whilst the proposed compound would be located outside of the Conservation Area, the transport route would be the B1149 which leads in to Oulton Street and the Conservation Area from a southerly direction. The significant increase in vehicular movements to and from Oulton Street by construction traffic would impact the way in which the Conservation Area is experienced.

It is understood that the main compound 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. This is likely to involve a significant amount of infrastructure and traffic movements.

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. The 'Blickling Conservation Area Character Appraisal' indicates that settlements within the Conservation Area have a small, linear character. This is true of Oulton Street. It also states that the Conservation Area has a 'strong rural character'. 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". This number of vehicle movements would have an adverse impact upon the rural character of the Conservation Area.

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  
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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 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 management measures could have on its tenants, staff and visitors who use this road and the impact this would have on the character of the Conservation Area. As stated by the applicant, the scope of the use of the compound is not yet known; therefore it is difficult to fully assess the impacts upon the Conservation Area.

It is considered that the scale and nature of activity indicated (notably the on-site infrastructure and large amount of transport movements) within the submission is likely to be significant, and the concentration of this activity on the edge of the Conservation Area would be harmful to the setting of the small, linear character identified in the Conservation Area Appraisal.

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 Conservation Area.

#### **Q1.8.14**

**Applicant, NT**

**The NT [RR-056] outlines what it considers to be the archaeological interest of the North Norfolk coast in the area of the proposed cable landfall.**

**The applicant and NT are requested to provide further assessments of such archaeological interest together with further details of any mitigation that would be required in this regard.**

The landfall for the proposal would be at Weybourne to the west of land within the National Trust's ownership. This section of coastal land is important as there may be military defences within the coastal zone and also very old activity associated with deeper geological layers. The landfall area will see a large area of groundworks and would be very detrimental to archaeological remains.

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The Early and Middle Pleistocene deposits around Weybourne (the Cromer forest bed formation) are known for their association with ancient human occupation. Later activity in the area could include Roman fortifications and port settlements such as Branodunum (Brancaaster) to the west, which is land owned by the National Trust. More abundant, but still of significance are the military fortifications, structures and earthworks. Given the National Trust's knowledge of the abundance of these on the Sheringham Estate, it is considered important that such investigations are carried out.

As the coastal regions erode, it is important to understand and record any information on archaeological remains. We request that appropriate mitigation is in place to investigate and record this information. Information about the geological and archaeological potential and the Roman coastal archaeology from this site will enable the National Trust to more accurately predict the archaeological potential of its to the west and east at Sheringham.

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

Yours faithfully

*Nina Crabb*

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