

From: [REDACTED]
To: [Hornsea Project Three](#)
Cc: [REDACTED]
Subject: EN010080 Hornsea Project Three - Oulton Parish Council's Response to Deadline 3
Date: 14 December 2018 21:43:33

Dear Sirs,

In the temporary absence of the Chair, I am forwarding here below Oulton Parish Council's submission at Deadline 3.

Regards,

Alison Shaw

Oulton Parish Councillor

Hornsea Project Three

Registration Number 20010316 - Oulton Parish Council

Oulton Parish Council's submission at Deadline 3

Oulton Parish Council (OPC) has attended four of the five Hearings convened by the Examining Authority(ExA) during the week beginning 3rd December 2018 and has conducted one further meeting of the Orsted/OPC Working Group (WG) on 11th December.

The comments that follow are based on information gathered at these meetings and from emails exchanged with the applicant.

1. Choice of Access route to the Main Construction Compound at Oulton:

(a) Plans outlining the current status of the applicant's exploration of the alternative options for a dedicated access route, represented within Option "R", were only available to OPC at midnight on Wed. 5th December, i.e. midway through the week of Hearings.

For the sake of clarity:

Option R now contains 3 possible access options, as follows:

--[if !supportLists]-->• <!--[endif]-->Option 'A': uses the existing junction between

the southern end of Oulton Street and the Holt Road (B1149), but then creates a new access into a field to the west at a point approx. 190m up The Street. A dedicated access route directly to the compound would then be constructed across private land, following field boundaries and keeping well away from the Railway Gatehouse.

--[if !supportLists]-->• <!--[endif]-->Option 'C1': creates a new access directly off the Holt Road approx. 2.4km northwest of the existing junction with The Street. A dedicated access route to the compound would then be constructed across private land.

--[if !supportLists]-->• <!--[endif]-->Option 'C2': similarly, would create a new access approx. 1.9km to the northwest along the Holt Road, and then cross private land, involving quite a short distance.

(b) It is clear from these plans, from the Hearings, and from the subsequent WG meeting that the applicant's discussions with all stakeholders about these options, within Option R, **are still at a very incomplete stage**.

These stakeholders include:

<!--[if !supportLists]-->• <!--[endif]-->NCC Highways,

<!--[if !supportLists]-->• <!--[endif]-->Broadland DC,

<!--[if !supportLists]-->• <!--[endif]-->all relevant landowners and,

<!--[if !supportLists]-->• <!--[endif]-->equally importantly - Vattenfall.

On 28 Nov 2018, the applicant emailed to the WG:

"If NCC are supportive of Option R and if the landowners are amenable, we will try to get this package of information accepted into the Examination at a future Deadline. However, the project will maintain its position that it can make use of The Street."

Further, in an email on 5th December, the applicant outlined to the WG that:

"Three 'Option R' scenarios were tabled with NCC... along with the results of safety audits for each option. *These audits indicate that the Option R scenarios can, with some minor amendments, meet NCC's highways design and safety requirements. NCC have taken the Option R document away to review and will provide feedback in due course.*" (our emphasis)

NCC Highways has meanwhile indicated informally to OPC that, were the two Vattenfall windfarm projects (also locating 2 important construction compounds in the immediate vicinity), NOT considering sharing the same access route as this applicant, then **Highways would prefer one of the routes suggested within Option R**. It is only the danger of allowing, over time, the eventual emergence of a situation where there might be *two* significant HGV accesses onto the Holt Road, that is causing them to hesitate in what would otherwise be their promotion of Option R.

Oulton PC is currently arranging a meeting with NCC early in the New Year, to discuss and clarify this precise point.

(c) This situation highlights the enormous importance of *accurately* estimating the real cumulative impact of these two separate projects **at this early stage**. No sensible decisions about the access route can be made without such a process having been carried out.

In the interests of furthering realistic discussion of this problem, OPC suggested to the applicant at the Working Group meeting on 11th Dec. that they introduce Vattenfall as soon as possible to the notion that Orsted and Vattenfall should consider **joining forces on the issue of this cumulative impact**, and commit to **sharing** a dedicated access route across private land.

Such a joint commitment would solve many serious problems at a stroke, namely:

• highway dysfunction and significant environmental degradation of trees and hedges on the southern end of The Street for many years,

• serious loss of quality of life for residents of The Old Railway Gatehouse,

• the prevention of an ‘accidental’ development over time of *two* HGV construction accesses along one short stretch of the Holt Road, and

• the legacy dangers to the whole community of Oulton parish from the unintended consequences of those aspects of the plans in Option 1 (Passing Places) which NCC will insist on retaining permanently.

(d) OPC would hope, and have reason to believe, that at least one of the routes suggested within Option R could be achieved by negotiation with relevant landowners. However, in case consented powers might be necessary, it is vital that decisions on the access route are kept **within the bounds of the DCO** and this Examination process.

2. Timing of the choice of Access Route

While much useful information has recently been exchanged, OPC is now seriously concerned about the issue of timing.

At this week’s meeting of the Working Group, the applicant referred to the fact that they would like to reach a decision on the access route “by Deadline 4” (15th January 2019). OPC considers that reaching a decision at that time would be highly **premature**.

The stakeholders, referred to in the list above, who are still to be conferred with by the applicant, are also still in discussion with OPC. We are currently seeking a meeting date with NCC Highways in early January, and we would like to follow this up by meeting with Broadland DC and Vattenfall.

As Christmas will inevitably now intervene, there is no way that these meetings can take place, and information arising out of them be digested and discussed in a meaningful way with the applicant, before Deadline 4.

With respect, OPC would therefore like to suggest to the ExA that the applicant should be encouraged to **defer their final choice on the access route** (while actively exploring the feasibility of Option R) until, say, **Deadline 6** (8th Feb. 2019).

It is our belief that, as the details of the Main Construction Compound are a discrete piece of work within the project, we would hope that such a deferment would have no negative impact on the general progress of the examination of the application as a whole. Please advise us if this understanding is incorrect.

3. Other remaining issues

(a) **Core working hours on the compound:**

OPC was disappointed by the applicant's verbal response at ISH4 on 7th Dec. to close questioning from the Panel about the necessity for a 7am start to construction activities – with a 6am “mobilisation period” to allow for vehicular arrivals at the compound. There is a similar issue at the *end* of a very long working day.

The applicant's reply seemed to us to be inappropriately curt and dismissive of any residential amenity considerations – giving as its only justification for such long working hours a desire on the applicant's part to ‘get the job done and get out’. Given the extremely long timescale of this project, by whatever measure (this seems to change unpredictably at a moment's notice), residents of this parish will have to pace themselves over a long period, to absorb the negative repercussions of highway dysfunction, traffic noise, generators and lights - and a long working day will unreasonably exacerbate the severity of these impacts.

OPC hopes that our comments, and those of Broadland DC in regard to this issue, will be taken into account by the ExA in formulating core working hours, especially as the experience of residents close to the applicant's compound at Holton le Clay gives us little comfort as to the respect that may be shown for such conditions.

(b) OPC are still concerned about the possible use of **generators** on the compound site, which would grossly inconvenience the closest residents to the northwest, and also the 22 households to the northeast, in the settlement of Oulton Street, depending on the wind direction. Similarly, the situation is still unclear to us as to the necessity for continuous **security lighting** on and/or around the site at night. OPC requests that such lighting should be movement-sensitive only, as the residents already have experience of the intrusive nature of security lighting, when used some years ago on the same site for a much shorter project.

(c) Finally, OPC noted with concern at the Open Floor Hearing on 3rd Dec. the oral submission made by a resident of Salle, whose property lies within 80m of the crossover point of Orsted's cable corridor with Vattenfall's. This was the first knowledge we had of the existence of a Non-Disclosure Agreement between the two projects, covering the crossover point and possibly other elements of both projects.

OPC is concerned about the issues that this raises, viz:

--[if !supportLists]-->• <!--[endif]-->can the ExA properly scrutinise a controversial, unproven and potentially dangerous component of a project, when it is not privy to the details?

--[if !supportLists]-->• <!--[endif]-->is it appropriate for a private developer seeking access to public subsidy, as in this case, to be allowed to “hide” part of the plan from the public gaze? Can this be in the public interest?

--[if !supportLists]-->• since Vattenfall has already committed to HVDC, then the fact of the crossover point in itself dictates that Orsted must also opt for HVDC - in order to make the crossover safe with regard to the interaction of Electro-Magnetic Fields.

OPC respectfully seeks reassurance on the matters above at 3(c).

Paul Killingback

Chair

Oulton Parish Council

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