

From: [REDACTED]
To: [Hornsea Project Three](#)
Subject: Registration Number 20010316 - Oulton Parish Council's submission at Deadline 4
Date: 14 January 2019 22:30:09

Dear Sirs,

Oulton Parish Council (OPC) welcomes this opportunity to comment on the current status of the planning issues in relation to the Main Construction Compound at Oulton.

Since Deadline 3 the Parish Council has met with NCC Highways and has had some significant email exchanges of information with the Applicant. OPC has also read the updated Appendix 20 to Deadline 1 – Main Construction Compound Briefing Note, now re-named as Appendix 1 to Deadline 3.

The comments that follow are based on information gathered from these sources.

1. In a very recent email from the Applicant, their current position on the access route to the Main Construction Compound was stated thus:

“Given the feedback from NCC and landowners, the availability of an existing road, the potential environmental impacts associated with any of the Option ‘R’ scenarios and the interaction with other cumulative projects, we maintain our position that, Option 1: Passing Places remains the preferred access option to the main construction compound.”

OPC is forced to conclude from this that the range of alternative possibilities within Option R is no longer being seriously pursued, and so we must engage actively with the issues raised by Option 1: Passing Places.

2. In Appendix 1 to Deadline 3 we are provided with significant details about the pattern of cable drum deliveries to the Oulton compound, over a period of (at least) 2 years and 6 months. Over this period a total of 1,121 cable drums will be required to be delivered to Oulton, arriving at the port in shipments of 36 at a time, at 3-5 week intervals. They will then be delivered - each on its own low-loader – at a rate of 8-12 a day, over the subsequent 3 – 5 days. During the intervening weeks, before the next delivery week starts, these 36 cable drums will then have to leave the Oulton compound, again each on its own low-loader, and make its way to an appropriate work front on the cable corridor. This density of cable drum abnormal load traffic will continue, week after week, over the 2 years and 6 months of the active onshore construction period. This of course is in addition to the other 94 HGV traffic movements projected to be going in and out of the compound daily.

It should be noted that, if delivery is every 5 weeks, the project would over-run the 30 months construction period.

Orsted has never mentioned to us how, and when, the empty drums are to be transported back to Oulton and then, probably, back to the port for return to the manufacturer. These would be HGV movements over and above any that we are aware of in the documentation.

The sheer density of low-loader deliveries, in and out, and then out again to the cable corridor, is going to be relentless, and given the nature of these abnormal loads, is going to cause maximum disruption to all other road users on the southern end of Oulton Street. This of course will all be happening ‘alongside’ all the other daily

construction traffic HGV movements anticipated by the project, not to mention the similar cable drum traffic generated by the Vattenfall project - and of course all existing agricultural, commuter and other traffic. This scenario is going to be worse even than we imagined, and it is hard to conceive of how the residents of the Old Railway Gatehouse will survive.

OPC must state that the relentless intensity of this cable drum –and other – HGV traffic has come as a considerable shock. Whilst references are made throughout the documents to the possibility of a 2 x 4 year “construction window” for the project, if delivered in 2 phases, the Applicant is now stressing to OPC that the “active” construction period would only ever be over a period of 30 months, whether phased or not.

It is hard to imagine how the impact of the compression of all these cable drum deliveries and HGV traffic into that timeframe can be absorbed locally.

3. As they indicated at Deadline 3, the Applicant has now produced a VISSIM traffic simulation, modelling traffic flows on the southern end of Oulton Street, including the construction traffic generated by Hornsea Project Three. We hope that this also includes the projected traffic generated by Vattenfall’s Norfolk Vanguard - and Boreas.

OPC has not yet had sight of this simulation, but its initial findings were discussed at our meeting with NCC. On the basis of that discussion, OPC would like to make the following observations:

(a) It was indicated that the simulation had generated an “average 32-second delay” in journey time, over the existing time taken to travel the southern end of Oulton Street. OPC would like to know how this “average” has been derived e.g. whether it has been assessed over a 24-hour, 5-day or 7-day period. The only average with any meaningful use at all would be an average achieved by considering only traffic numbers and types using the road on weekdays and during daytime hours that include the full range of commuter and agricultural harvest traffic - as well as factoring in the vehicles generated by the Vattenfall project. Including any quiet times (e.g. nights) would only exacerbate the distortion necessarily created by any reference to an average.

(b) We would also question the very limited usefulness of using the concept of an “average” delay at all. No human receptor - be they tractor driver or commuter car driver - actually ever *experiences* an “average” delay to their journey. What they *actually experience* is, say, a 15-minute complete stoppage while the road is closed to let 3 low-loaders carrying cable drums through, or a 5-minute delay in trying to get onto the Holt Road because of a backing-up on Oulton Street while several HGVs (construction and agricultural) are trying to turn off the Holt Road, across the stream of traffic. The sheer variety of different farming operations (local and contracted), residential and commuter traffic, construction traffic from 2 major projects, and vehicles generated by local businesses, services and significant summer tourism means that Orsted will never be able to choreograph this traffic in a way that will be able to smooth out regular and *frustrating* inconvenience to other road users.

(c) In addition, it must be established whether Orsted have factored into their data inputs for the VISSIM the introduction of a (temporary, for several years) 30 mph speed restriction, as was discussed at our meeting with NCC. Such a speed limit is deemed necessary by Highways in order to cope safely with the different skid resistances arising from the mixed surface provided by creating lengthy Grasscrete passing places directly alongside a single-lane standard roadway.

In current conditions, it is entirely possible for a passenger car to drive down the southern end of Oulton Street, from Saltcarr Farm to the Holt Road in 55 - 60 seconds. This allows for slowing to 30 mph to cope with the 'hump' and the bend, and passing safely the occasional oncoming car. It allows for safely driving at 50 mph where possible. If one drives that same road at a maximum of 30 mph, then it adds approx. 20 seconds to the total journey time.

Have Orsted factored into their inputs for the VISSIM therefore, that every single journey for any PCU will take 20 seconds longer, whether it is delayed by additional construction traffic or not?

(d) At our meeting with NCC, we were surprised to learn that the Applicant had that morning submitted to them an entirely new suggestion viz: a reduction in the size and therefore the width of the cable drums, from 4.4m to 3.5m. With reduced drum size comes less cable. We pointed out that this would inevitably entail, given that the length of the cable corridor remains constant, an increase in the number of cable drums requiring delivery to Oulton. This was agreed, and NCC will be requesting therefore new figures from Orsted, on the increased number of low-loader deliveries that will now be needed. This revision will also necessitate a change to the VISSIM.

(e) We have gone into detail on these issues in an attempt to illustrate 2 simple points:

- <!--[endif]-->that only with *accurate* input data will anything like useful information come out of such a model;
- <!--[endif]-->that statistical smoothing necessarily distorts the real experience of traffic congestion and dysfunction on the ground.

4. On other matters, OPC remains highly concerned about:

- <!--[endif]-->the core working hours for the compound;
- <!--[endif]-->generators and lighting;
- <!--[endif]-->the lack of commitment to pre-ducting for a phase two.

5. Finally, OPC is forced to observe that the number and scope of the continuing changes to Orsted's "plans" for this project are breathtaking. It is hard for us to have confidence in a situation like this, where the "facts" change beneath our feet, seemingly on a weekly basis, and we can develop **no stable picture of the construction process** that is about to impact severely on our community, whether we like it or not, over a period of many years

Paul Killingback

Chair

Oulton Parish Council

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