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Subject: Registration Number 20010316 - Oulton Parish Council's submission to PINS at Deadline 8
Date: 22 March 2019 21:46:39
Attachments: [Orsted D8 Appendix 1 AIL delivery scenarios.xlsx](#)

Hornsea Project Three

Oulton Parish Council (OPC) would like to take this opportunity to comment on the Applicant's submissions at Deadline 7 and to make some concluding remarks.

OPC makes the following observations on Appendix 28 to DL7 (Cumulative Link Impact Assessment relating to Traffic: Oulton and Cawston March 2019):

(1) Appendix 28 uses the year 2022 to establish its future baseline traffic scenario, whereas the VISSIM modelling simulation uses the year 2028. We query the rationale behind the Applicant's choice of two different years for traffic baselines, which each generate important data for use by the ExA, since the outcomes from these two scenarios will of necessity be different.

(2) At 3.10, the assessment refers to the IEMA guidelines for assessing the significance of traffic effects. OPC makes the following observations:

- Severance of routes: Vattenfall have proposed not to use trenchless crossing for the B1149, and this may result in temporary closure of this route while construction is carried out. This would impact on the traffic for both projects and on existing traffic - especially agricultural HGVs, as they will be forced to seek an alternative route. OPC are extremely concerned that this, and other aspects of the highway dysfunction created by these projects will, over time, result in much of the HGV traffic generated by the existing large agribusiness (based at Street Farm immediately to the north of the Main Construction Compound site entrance) choosing to come north through the residential settlement of Oulton Street. At present, residents are only forced to tolerate about 50% of the traffic generated, but many fear that the dysfunction and congestion created by these projects on the southern end of The Street will force the agricultural HGVs to change their routes - and there is no mechanism to prevent them from doing so.
- Pedestrian delay/amenity: The Street (Link 208) does not have any footpaths; with increased traffic from both projects, anyone walking their dogs or cycling along the Street will find refuge difficult. The road interventions proposed will effectively remove a lot of the verge, to accommodate the upgraded passing places. It should be noted that the southern end of The Street is a favoured part of a cycle route for many regular cycling groups, who come through in packs both before work (around 7am) and after work.
- Accidents and road safety: OPC welcome the temporary reduction of the speed limit to 30mph for the duration of the project, but the increased traffic on The Street and the B1149 produces significant potential for increased accidents if large vehicles not associated with the projects misjudge the ability to pass one another at any point on the route.
- Hazardous, Dangerous and Abnormal Loads. OPC has worked hard to try to

extract from the Applicant a comprehensive and credible picture of the realistic pattern and density of Abnormal Indivisible Loads (AILs). Only at this eleventh hour is it finally and reluctantly emerging in the most recent documents that many – possibly all – of these loads will be delivered TO the compound in the evening and/or at night, and even now we are still having to base some of our conclusions on inference.

(3) Abnormal Load Deliveries to the compound at night:

In the Applicant's Appendix 24 to Deadline 7 (Construction Traffic Noise Assessment Clarification Note March 2019), the following statements appear:

“Appendix 23 to Deadline 6 submission – Construction Traffic Noise and Vibration Assessment at The Old Railway Gatehouse (REP6-037) scoped out the movement of abnormal loads at night ... However, following a request from Broadland District Council, this document provides an assessment of the potential for noise impacts from abnormal load deliveries in the early morning and late evening (23:00 – 07:00). The document considers the following scenarios:

- 50 % of abnormal load movements to occur during the daytime (07:00 – 23:00) and 50% of abnormal load movements at night (23:00 – 07:00) as a likely scenario; and
- 100% of movements at night (23:00 – 07:00) as a maximum design scenario.”

In light of this late information, OPC has produced a table providing an indicative illustration of how and when these AIL movements into and out of the compound might actually occur. Please see Appendix 1.

OPC is obliged to comment that the above scenarios make a complete nonsense of the core working hours: if deliveries of cable drums TO the main construction compound are permitted at night then, given the density and regularity of these deliveries over a 30-month period, the active working hours for the main construction compound are effectively 24 hours per day.

It is hard to see how the unloading of an enormous cable drum at the compound at night could be effected without noise, staff, and the need for adequate lighting. The Applicant is also failing to draw attention to the fact that the empty low loader, on leaving the compound at night and returning to the main road network, will ‘clatter’ past any unfortunate dwellings.

The implications therefore are that for the Railway Gatehouse there will be no respite at all, day or night, for two and a half years; for Manor Farm and other residents to the west of the compound there will be regular noise and light disturbance events at night; and for the settlement of Oulton Street there is the potential for noise and light pollution from the compound during many nights of every week.

This is a far worse outcome than the Parish Council or the residents of The Old Railway Gatehouse could ever have imagined.

Given that all residents of the parish already struggle to absorb the impact of the ever-increasing size, weight and number of agricultural vehicles throughout the year, it is hard for the community to contemplate these additional HGV increases and night-time

Abnormal Load deliveries with anything other than dread.

The Applicant's conclusion that, simply because of the introduction of a few passing places and the grading of a hump, the adverse effects of their additional traffic will be "negligible," is astonishing.

Summary:

Oulton Parish Council regrets indeed that by the closing stages of this Examination process, we have been unable to reach any satisfactory agreements with the Applicant.

Originally, the Applicant conducted an assessment of Weston Longville as the site for its Main Construction Compound but eventually concluded that there were intractable problems. The site at Oulton former airfield was suddenly offered to the project by the landowner at a late stage in the consultation process and – crucially – no detailed assessment of the site and its access was undertaken pre-application. OPC contacted the Applicant as soon as it understood that a change had occurred but, apart from (eventually) attending one parish council meeting, the Applicant was reluctant for several months at pre-application stage to engage actively with the parish.

A better outcome might have been achieved if some of the above had not been the case.

As real engagement with the Applicant eventually got underway, and 'facts' gradually emerged, OPC has gone to some lengths to try to offer modifications to the plans (e.g. Option 'R') in an attempt to facilitate the use of the compound, while limiting the damage caused by this project to our community.

However, in these closing stages of Hornsea Project Three's Examination process, the following issues remain outstanding for the parish of Oulton and the surrounding area:

- clarity on the real patterns of Abnormal Load deliveries to and from the main construction compound;
- clarity on the real nature of the other HGV movements to and from the compound by type and function;
- clarity on the real extent of the active working hours of the compound;
- clarity on the status, and even the possibility, of meaningful mitigation for the residents of the Old Railway Gatehouse.

It is now the opinion of OPC that to leave the arrangements for the Construction Traffic Management Plan, and for compliance with the Code of Construction Practice, to be settled post consent would be extremely dangerous.

Once consent is granted, the construction imperatives of the project and its national significance will become overriding and will place NCC as the Highways Authority in an impossible position in their on-going negotiations over the safe and functional operation of the highway network throughout North Norfolk for a minimum period of two and a half years.

In addition, the District Councils – for the same reasons - will be completely powerless to protect the residential amenity of the people and communities of North Norfolk in any meaningful way.

Concluding Remarks:

Oulton Parish Council has expended a huge amount of time and effort over more than a year now in meetings with the Applicant and other stakeholders, attending Hearings, and in reading, analysing and responding to vast amounts of paperwork generated by this Applicant in pursuit of their Development Consent Order.

In our attempts to form a realistic picture of the cumulative impacts of two wind farm projects on this and neighbouring parishes, we are simultaneously going through the same process with the developers of the other project, Vattenfall.

We reach now a point where we are considerably more alarmed at the end of this process than we were at the beginning.

OPC are of course acutely aware that the effects on this community are only a small consideration when compared to the potential benefits of this enormous offshore wind farm. We are also, however, acutely aware that several much bigger issues with this project appear to remain unresolved at this late stage, and that the Rochdale envelope must be bursting at the seams in order to accommodate this fact.

Some of the larger unresolved issues, that we are aware of, appear to include:

- the choice between HVAC or HVDC as a transmission system;
- the acceptability of the choice of HVAC in terms of its severe consequences onshore;
- the engineering of the cable crossover point between the two projects and its possible health effects;
- the refusal to commit to pre-ducting at phase 1 for a phase 2...

...and there will be many more.

The whole purpose of the planning system is to weigh in the balance the costs and benefits of future developments. This is true whether at local or nationally significant level.

Oulton Parish Council would like to re-state at this point its support for offshore wind as part of the UK's lower-carbon energy mix.

We are forced to conclude however that – in terms of its impacts onshore - the benefits of this project are significantly outweighed by the severe and unacceptable costs.

In order to protect, therefore, the significant benefits represented by this project in terms of renewable energy, the only suggestion that we, as a small parish council, can possibly offer is that the grid connection arrangements for this project be re-considered, and moved offshore.

Finally, Oulton Parish Council would like to take this opportunity to thank the Examining Authority for the rigour of its questioning and the fairness of its handling of this Examination process.

Appendix 1 - AIL Delivery Scenarios.

Paul Killingback
Chair
Oulton Parish Council

Oulton Parish Council - Deadline 8 Submission.				
Appendix 1. Abnormal Load Delivery Likely Scenarios.				
Week 1	Week 2	Week 3	Week 4	Week 5
36 cable drums from port to Main Compound	12 Cable drums delivered to cable route	12 Cable drums delivered to cable route	12 Cable drums delivered to cable route	36 cable drums from port To Main Compound
Night deliveries (23.00-07.00)**	07.00-23.00	07.00-23.00	07.00-23.00	Night deliveries (23.00-07.00)**
Originally advised by Orsted 8-12 a day/3-4 days	Outside of peak hours 07.45-08.45/17.15-18.15	Outside of peak hours 07.45-08.45/17.15-18.15	Outside of peak hours 07.45-08.45/17.15-18.15	Originally advised by Orsted 8-12 a day/3-4 days
LIKELY Scenario 7/8 a night over 5 days	3 a day /4 days##	3 a day/4 days##	3 a day/4 days##	LIKELY Scenario 7/8 a night over 5 days
8 hours window	14 hour window	14 hour window	14 hour window	8 hours window
**Night time deliveries will be the most intensive when the 36 cable drums are delivered TO the Main Compound in one week resulting in 7/8 a night over 5 days.				
##Week 2,3,4 deliveries FROM the main compound TO the cable route would be 3 a day over 4 days, which would mean a potential delay of 5mins 42 seconds, 3 times a day, for the B1149 dependent on time of day.				
**This scenario would be repeated until 1,121 cable drums had been delivered <u>TO</u> the Main Construction Compound and then <u>OUT</u> again to the cable route in the 30 month active construction period				