

## NORFOLK BOREAS examination

### Oulton Parish Council: Submission at Deadline 1

Summary of Issues raised and discussed in all OPC's Written Representations that were submitted to the examination of **Norfolk Vanguard**:

#### Rule 6 Response:

Cumulative impacts with Hornsea Project Three – a brief summary.

#### Deadline 1:

- Cumulative traffic: Vattenfall and Orsted sharing Link 68 and the B1149
- Vanguard/Boreas projects in isolation: cable drum issues – delivery, storage and return of empty drums
- Traffic issues – has competing agricultural traffic been assessed? What mitigation for the Railway Gatehouse?
- Has the recent dismissal of an Appeal for an Anaerobic Digester in Oulton, on grounds of HGV traffic and the Railway Gatehouse, been considered?

#### Deadline 2:

- Link 68 / MA7 / Cable Logistics Area
- - Link 75
- Cumulative traffic impact with Hornsea Three
- Old Railway Gatehouse

#### Deadline 3:

- Link 68 / Link 75
- Applicant commits to NOT routing traffic through northern end of Oulton Street
- OPC endorses Panel's request for 3 traffic impact scenarios to be submitted by Applicant: for Vanguard operating alone, for Vanguard operating simultaneously with Hornsea 3, and for Vanguard operating before Hornsea 3
- Appeal for an AD was dismissed in 2014 – access road the same as Link 68. Appeal ref: APP/K2610/A/14/2212257: **full Appeal Decision document appended to this submission**
- Core working hours, noise and light pollution
- Cable crossover point: concerns about EMF and Non-Disclosure Agreement

#### Deadline 4:

- Cumulative traffic impacts of Hornsea Three with Vanguard
- **VISSIM traffic modelling** (produced by Orsted) has significant implications for Vanguard
- VISSIM appears to demonstrate severe adverse impacts from combined traffic: **some VISSIM screenprints appended to this submission**
- Issues with AILS
- Has Vattenfall factored any of the detailed HGV and Abnormal Load information from Orsted into their estimates?
- Has Vattenfall conducted any similar traffic modelling of potential delays from cumulative traffic?
- OPC note that Norfolk Vanguard are NOT proposing to use trench-less crossing (HDD) at the point where the cable route crosses the B1149.

#### Deadline 5:

- OPC seeks clarification as to whether Vattenfall agrees to implement the whole road intervention scheme proposed by Orsted, if Vanguard moves into construction first.
- **OPC would prefer the management agreement between the two parties relating to the intervention schemes, and their decommissioning, to be part of the DCO.**
- Problems with the road intervention scheme for Link 68: inc. Railway Gatehouse
- Link 75: issues need to be assessed by the ExA – not “post-consent”
- Cable Logistics Area: lack of clarity re: the real status of the CLA - just for ‘buffer’ storage, or more general storage of cable drums?
- Issue of “conservative” estimates versus maximum-design worst-case scenarios
- Lack of clarity over whether there will be evening and/or night-time deliveries to MA7 and CLA
- **Appendix 1: Table of estimated Vattenfall HGV movements to/from the CLA.**

#### Deadline 6:

- **Copy appended of our full submission to Hornsea 3 ExA at D7 re: Orsted’s VISSIM traffic modelling**
- Although NV’s cable drums will be smaller, the relentless regularity of Hornsea Three’s competing AIL deliveries to their Oulton compound will have a major impact on the ability of Norfolk Vanguard to pass smoothly up and down the access route.
- Need for Vattenfall to conduct noise and vibration assessments at the Railway Gatehouse – especially since Orsted’s assessments were flawed.
- Urgent need for Vattenfall to conduct an air quality assessment at Railway Gatehouse – especially as Orsted never conducted one
- OPC notes that Vattenfall now commits to adopting in its entirety the Traffic Management Plan evolved by Hornsea Three for Link 68.
- OPC expresses concern that Vattenfall have conducted no independent assessment of Orsted’s highway intervention scheme for Link 68
- Request made for traffic numbers by type and function
- **APPENDICES: (1) Further VISSIM screenshots / Notes (2) Abnormal Indivisible Load (AIL) data**

#### Deadline 7:

- Continuing queries relating to the Cable Logistics Area – cable drum numbers: OPC seeks clarification as to whether the 360 cable drums required for the Norfolk Vanguard project would be repeated for the Boreas project, equating to a total of 720 cable drums to complete both phases?
- Consented hours: 12-hour working days with clear possibilities of 24-hour working at times
- Link 68: inadequacies of baseline traffic figures and dangerous reliance on already flawed data ‘borrowed’ from Orsted
- Trenchless crossing of B1149: Vattenfall still resisting HDD for this crossing, despite consistent opposition from NCC
- Link 75: deficiencies of Vattenfall’s OTMP re: uses of ‘pilot vehicles’ and vague references to ‘road widening’. NCC noted at ISH6 the dangers of leaving such important ‘details’ unresolved until post-consent

- Noise, Vibration and Air Quality assessments: deficiencies of Vattenfall's baseline assessments of these: desk-top surveys or data 'borrowed' from Orsted
- **APPENDICES 1 – 3: Air Quality data**

Deadline 8:

- Noise mitigation measures for the Railway Gatehouse: further exploration – and query as to whether Vattenfall intend to implement fully Orsted's commitment to certain measures
- Idling and accelerating HGVs in proximity to the Railway Gatehouse – full discussion of implications
- Air quality at Railway Gatehouse: OPC challenges Vattenfall's conclusion of "negligible" impact
- Trenching of B1149: OPC challenges feasibility of this, on both practical and highway safety grounds
- **Oulton Parish Council's Final Position Statement**

Deadline 9: In response to Applicant's D8 submission:-

- Noise assessment for Railway Gatehouse: OPC challenges Vattenfall's response at D8 – queries why noise has been 'averaged' over an 18-hour day
  - Observations on continuing flaws in OTMP for Link 68, including the fact that the cumulative effect of a new 30mph limit on the likely behaviour of the traffic of both projects has not been fully assessed or understood.
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**From:** [REDACTED]  
**To:** [Norfolk Vanguard](#)  
**Subject:** re Preliminary Meeting Norfolk Vanguard  
**Date:** 30 November 2018 15:29:39

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## Oulton Parish Council

[REDACTED]

Oulton Parish Council

[REDACTED]

Registration identification number is 20012656.

Oulton Parish Council is unable to attend the preliminary meeting or the open floor hearing on the 10<sup>th</sup> December due to other commitments.

However we would like the opportunity to highlight issues regarding Vattenfall's Norfolk Vanguard (Boreas) projects and its potential cumulative impact with Orsted Hornsea three projects, given their shared access route and impact on residential amenity and local roads.

Oulton Parish Council would wish to be included in any Issue Specific Hearings or written responses if it feels appropriate.

### **Cumulative Impact issues:**

**Vattenfall Norfolk Vanguard (Boreas)** will be accessing the cable route (**LINK 68**), mobilisation area (**MA7**) and their **Cable logistic area** from B1149 on to 'The Street' at the same time potentially as **Orsted Hornsea Three** will be using the same route to access their Main Construction Compound. Hornsea three Main Compound will be used for their entire project (8 years); therefore there will be conflict with traffic movements.

- There seems to have been very little in the way of information as to how the two projects will coordinate their traffic especially HGV's, but we understand they are in discussions. To date they have not shared with OPC their traffic plan for shared access. Currently the traffic numbers documented for both projects are:
- **NORFOLK VANGUARD:** Mobilisation area & ducting for Vanguard (& Boreas) 96 HGV's and 80 staff vehicle movements a day for 46 weeks.



- **NORFOLK VANGUARD/BOREAS:** cable pulling 65 HGV's/43 other vehicle movements a day for 2 years (+ Boreas 2 years).
- **HORNSEA THREE Main Compound:** 118 HGV's and 130 staff vehicle movements a day for 8 years
- **Orsted HOW3** proposes to make several changes to the 1km stretch of 'The Street', which is a rural road to be able to accommodate their HGV's; These will consist of a permanent modified road junction at the B1149/The Street with warning signs, extended passing places, widened bend, permanent smoothing of an old railway hump with priority signage.
- **Vattenfall** have not proposed any changes to this access route even though traffic numbers are nearly the same. As far as OPC are aware they haven't carried out any ATC surveys for 'The Street' or carried out a safety audit. OPC would like to know if Vattenfall propose to share Orsted's traffic scheme and costs.
- If Vattenfall propose to operate their own traffic scheme, how will this work with the combined traffic created by the two projects combined with the large numbers of existing agricultural vehicles and other traffic?
- **Vattenfall's** data for existing traffic along 'The Street' has been estimated only (ES Chapter 24 traffic & transport/ 1000 all vehicles). Orsted have recently carried out an ATC for 'The Street'. This highlights that Orsted & Vattenfall have documented differing existing traffic numbers; clarification is needed, as this will have implications on actual vehicle numbers using this stretch of road and its ability to cope with a significant increase in HGV's. The agricultural use of this road for harvesting and transporting of crops away will also influence the traffic numbers.
- There is one residential property '**The old Railway Gatehouse**' that will be exposed to the traffic from both projects as the property is located on 'The Street'. The increase in HGV's using the same route from the two projects over an extended period will impact hugely on this property's amenity. There is a need for this property to be assessed in respect of air quality, noise and vibration, and mitigation sought to reduce the cumulative impact.

Susan Mather, Oulton Parish Council

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**From:** Paul Killingback [REDACTED]  
**Sent:** 15 January 2019 16:30  
**To:** Norfolk Vanguard  
**Subject:** VATTENFALL NORFOLK VANGUARD - Registration identification number: 20012656

**Follow Up Flag:** Follow up  
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## Oulton Parish Council submission at Deadline 1.

Oulton Parish Council (OPC) welcomes the opportunity to make comments as part of Deadline 1 and also confirm its attendance at the Hearings on 5<sup>th</sup> to 7<sup>th</sup> February 2019, reserving the right to speak.

OPC requests the Panel make an Accompanied Site Visit to the Junction B1149/1 km length of The Street, Oulton, to consider the access route proposed by Vattenfall NV/Boreas, which is also to be used by Orsted Hornsea Project Three to access their Main Construction Compound nearby.

### 1. Cumulative Traffic: Vattenfall & Orsted

OPC has studied the HGV movements and timeframe for Norfolk Vanguard utilising **LINK 68/Mobilisation area (MA7) and Cable Logistic Area**, which includes the pre-ducting for Boreas. It is anticipated that the use of this site will generate **176 daily vehicle movements, of which 96 will be HGV.**

Additionally, Oulton will be affected by the HGV movements proposed for LINK 75 along the Blickling Road – **72 HGV movements daily**. This is a highly unsuitable road with narrow carriageway and sharp bends.

To date, no cumulative impact assessments have been published for the proposed shared access route **B1149/The Street** to be used by Vattenfall and by Orsted Hornsea Three to their Main Construction Compound. The development and use of Orsted's compound will have a significant impact on the Vattenfall project - especially as Orsted will be using their main construction compound at Oulton throughout the entire life of their project - potentially 2 x 4 years.

The key issues identified to date are: -

- Cable drum deliveries (Abnormal Loads). Orsted will transport from a port on low loaders as abnormal loads all of their cable drums (**1,121**) to Orsted's Main Construction compound. These will arrive by ship (**36 drums per ship**) and be transported at a rate of **8-12 a day over 3-5 days every 3-5 weeks**.
- These cable drums will then leave the Compound to the cable route periodically during the other weeks during construction. (Orsted are not proposing pre-ducting for cables, unlike Vattenfall)
- Although these deliveries to and from the Main Compound are part of Orsted's proposed 118 daily HGV movements, their size and frequency does raise the prospect that The Street will become unusable for all vehicles at some points during the day. This will directly affect Vattenfall's operations.
- OPC has concerns that traffic generated by various agricultural activities that use this route consistently, throughout multiple prolonged harvest periods, have not been adequately taken into account.
- OPC has recently met with Norfolk County Council Highways (NCC). NCC have concerns the cable drum sizes initially intended will not be able to be transported along the rural road network. As a result, Orsted

have proposed using smaller cable drums. OPC must assume smaller drums will hold less cable and therefore have the effect of increasing the number of HGV deliveries to maintain the volume of cable needed for the project.

- It is unclear if the empty cable drums are to be returned to the Compound prior to return to port, creating additional abnormal load movements.

## 2. Vattenfall: Norfolk Vanguard/Boreas projects.

Taking the Vattenfall Norfolk Vanguard/Boreas traffic in isolation without the cumulative impact of Orsted, OPC have a number of concerns. Vattenfall are proposing to send most of their cable drums directly to the cable routes and only occasionally store cable at the Cable Logistic Area but cable drums will nevertheless go down the **LINK 68 /cable route**.

- Will cable drum deliveries also be classed as abnormal loads?
- Do the traffic numbers include returning empty cable drums?
- What analysis of current traffic using this route has been done?
- How has the significant, seasonal, and crop-dependent agricultural traffic been assessed? The knock-on effect of significant highway dysfunction could be that existing local traffic and agricultural vehicles re-route through the residential settlement of Oulton Street to avoid the southern part of The Street to the B1149 junction. This would impact severely on residential properties that front directly onto the road, with no footpaths. It must be understood that residents of the settlement of Oulton Street have already almost reached breaking point in their ability to absorb the existing levels of continuous agricultural HGVs passing their homes, and any increase in such traffic would be intolerable.

OPC understand that Vattenfall are proposing a 'pilot vehicle' system for HGVs in and out of their site and are not proposing any modifications to The Street, to enable it to accommodate large vehicles along the access route, in particular low loaders / HGVs. This proposal would have significant implications for existing traffic (especially agricultural). For this to operate along a 1km length, OPC anticipate that significant 'held' traffic would queue back on to the B1149 junction, a clear highway safety issue.

- Has this proposal been discussed and agreed with NCC Highways?
- Has a safety audit been done on the B1149 junction with reference to the accident record? OPC would point out that a number of accidents have occurred at this point (most recent November 2018).

OPC doubt that such a system could work effectively. The residents of 'The Old Railway Gatehouse' (already affected by the cumulative traffic impacts of both projects) would be 'locked in' to a management system around them.

- What mitigation proposals do Vattenfall have in respect of this property and in respect of the road hump outside this property that could prevent the use of low loaders delivering to their cable storage site?
- What, if any, analysis has been carried out by Vattenfall on the planning history of the area, and in particular the Appeal Decision in respect of an Anaerobic Digester on the airfield site. (APP/K2610/A/14/2212257)? The use of the southern end of The Street for large numbers of agricultural/HGV traffic and potential highway dysfunction was the key consideration in rejecting that application. This was despite plans for improvements to the informal passing places – which are not in the Vattenfall proposal.

OPC still doubt the effectiveness of how Vattenfall will manage their traffic and whether the modifications proposed by **Orsted** for The Street are being relied upon by Vattenfall, and are in fact a key part – though undeclared - of their mitigation plans.

## 3. Statement of Common Ground

Due to other commitments, OPC have only recently been able to arrange a meeting in early February 2019 with Vattenfall representatives to discuss traffic and cumulative impacts as part of a working group. OPC

did meet with Vattenfall's traffic and construction engineers as part of the Boreas consultation, but work on a Statement of Common Ground has not been progressed.

OPC are however supportive of the use of ducting for the projects and the commitment to HVDC technology.

Paul Killingback  
Chair  
Oulton Parish Council

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To: [Norfolk Vanguard](#)  
Subject: VATTENFALL NORFOLK VANGUARD - Registration identification number: 20012656  
Date: 29 January 2019 21:13:43

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Oulton Parish Council submits these comments as part of the Examination of Norfolk Vanguard at Deadline 2.

## **1. LINK 68/MA7/Cable Logistic area**

**Vattenfall's response to NCC at deadline 1: -**

***The proposed use of The Street at Oulton is required to access a single mobilisation area (MA7) further east along Heydon Road. This access route is identified as Link 68 within the application. MA7 is only required to support the construction works in proximity to Oulton, and is not a main works compound.***

OPC would like to comment that LINK 68 is also the access route to the **Cable Logistic Area**. As OPC previously pointed out, the Cable Logistic Area is only mentioned on maps; there are no data in any documents specifically describing its location, function or reason for selection. This area was a late addition and **only appeared on final maps**.

Vattenfall have stated that ***“During cable pull phase, materials will be delivered directly to the joint locations or through the use of a Cable Logistics Area (existing hardstanding near Oulton) (Figure 5.4 map 5).”*** and in the draft SoCG that ***“Cable drums required for the cable pull will be delivered either directly to the joint locations or temporarily stored at the Cable Logistics Area prior to delivery to the joint locations.”***

OPC is very concerned that it appears the Cable Logistic Area is the only one for the whole project, and it is unclear whether the traffic figures submitted for LINK 68 also include cable drums going to the Cable Logistics Area. We seek clarification on whether this area is being utilised to store cable for other parts of the cable route and if this is factored into the final traffic numbers.

From OPC's discussions with Orsted (Hornsea Project Three), cable drum deliveries are classed as abnormal loads due to the width of the drums. With no changes to the local road system proposed by Vattenfall (specifically the B1149 junction and the road 'hump' outside The Old Railway Gatehouse) OPC doubt that such deliveries will be easily achieved. Clearly, the cumulative impact of Norfolk Vanguard with the Orsted project will also have further consequences, which do not appear yet to have been considered.

OPC also would like to ensure that any such deliveries are made only during the proposed working day and not at night or “out of hours”.

## **2. LINK 75**

It has come to OPC's attention that Oulton will also be impacted by **LINK 75** which will see 72 HGVs daily (Peak) travelling from Saxthorpe roundabout/Blickling Rd to the cable route between Blickling and Aylsham. This road is particularly narrow with several sharp bends, residential property at the roadside and a narrow (weight restricted) bridge. This route will mean that HGVs will pass Blickling Hall, a significant tourist location attracting car/caravan/coach traffic, all year round, but particularly during the summer months.

This route also sees a high volume of agricultural traffic, particularly between the junction with New Road, Oulton and the turn-off to the village of Itteringham. OPC would like the

applicant to demonstrate that this route has been adequately assessed for suitability and the volumes of additional traffic proposed.

### **3. CUMULATIVE TRAFFIC IMPACT**

**Vattenfall** have not produced plans as to how traffic travelling along The Street from B1149 to LINK 68/MA7/Cable logistic area can safely interact with existing traffic (agricultural/local) and the large volume of traffic generated by Hornsea Project Three.

**A vehicle Pilot Scheme** has been suggested but no further information on traffic management has been forthcoming. It is difficult to see how such an operation will work without the danger of held traffic queuing onto the busy B1145 junction. **Orsted Hornsea Three** have proposed a series of road modifications for 'The Street' to enable their traffic to access the Main Construction Compound. OPC cannot understand why similar proposals have not been put forward by Vattenfall, given the same route, type of vehicle and very similar traffic volumes. OPC assumes that some sort of arrangement will be negotiated if both projects progress and run concurrently, but **if Vattenfall are the first or only project** it is hard to understand why changes to the road are not being considered at this stage. OPC would like to know if a road safety audit or traffic surveys have been carried out for 'The Street'(Link 68) and Link 75.

### **4. THE OLD RAILWAY GATEHOUSE**

This property will be severely impacted by all of the Vattenfall traffic passing daily for a prolonged period. Vattenfall have failed to answer OPC's comments at deadline 1 regarding the impact on this property. OPC questions what assessments have been carried out regarding noise and vibration and whether any mitigation is proposed?

Paul Killingback  
Chair  
Oulton Parish Council

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**From:** [REDACTED]  
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**Subject:** VATTENFALL NORFOLK VANGUARD - Registration identification number: 20012656 Oulton Par  
**Date:** 13 February 2019 22:17:13  
**Attachments:** [20130860 AD Appeal Decision.pdf](#)

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**Oulton Parish Council (OPC) welcomes the opportunity to make the following comments at this stage of the Examination process:**

Since Deadline 2, the Parish Council has attended the Issue Specific Hearing on Onshore Environmental Matters (5/2/19) and held the first meeting of a Working Group (WG) with the Applicant, in Oulton (6/2/19). The WG meeting, which was attended by a lead construction engineer, was very helpful and allowed us to develop a more detailed understanding of the Applicant's construction process. We look forward to a further WG meeting, this time with a lead traffic engineer, at the Applicant's earliest convenience, as traffic and transport queries still remain.

The Parish Council has submitted detailed responses to the Norfolk Vanguard project at Deadlines 1 and 2; we shall restrict ourselves here to a brief summary of our current main concerns:

1. LINK 68: It is still unclear to us what volume of traffic will be using the Cable Logistic Area, over what period, whether empty cable drums will be delivered back to this site before return to the manufacturer, and whether any or all of this traffic - HGV and otherwise - has been **included** in the figures stated for Mobilisation Area 7 **or is in addition to it**.
2. LINK 75: We remain concerned about the feasibility of using the Blickling-Saxthorpe road for HGV traffic, but we are equally concerned that, should the idea of using LINK 75 be abandoned, this may well result in **those additional HGVs** being funnelled up the already congested LINK 68 towards MA7. We shall need clarification on this.
3. In any event, the Parish Council would like to point out very clearly at this early stage that any consideration in the OCTMP of a scheme involving HGV or staff vehicles being routed through the **residential settlement of the northern section of Oulton Street would be completely unacceptable**. At the WG meeting on 6/2/19, we welcomed reassurance on this point from the construction engineer who made a clear statement that such a route would never be considered.
4. OPC is obliged to reiterate its 2 major concerns about Vattenfall's overarching approach to traffic management on LINK 68 (The Street, Oulton) namely that: **(A) the cumulative impact** of Vattenfall's traffic with the large volumes of traffic generated by Orsted – and sharing the same access route – has not been adequately assessed or understood, and that conversely **(B) the implications of a scenario in which Vattenfall is the only project to go ahead** seem **also** not to have been understood. As no mitigation measures for the roadway are being promoted by Vattenfall then, in the event of a solo scenario, **significant problems will occur**, for instance at the junction of The Street with the B1149, and in negotiating “the hump” outside the Railway Gatehouse. OPC struggle to visualise how a ‘pilot scheme’ for all the Applicant's HGV traffic could possibly work, given the sheer volume of other traffic that will be competing for the use of 1km of that stretch of

road.

In order to address these concerns about cumulative impacts and mitigations, the Parish Council would like to endorse the request made by the Panel at the ISH on 5/2/19, namely that the Applicant should submit three traffic impact scenarios:

- • for Norfolk Vanguard (NV) operating alone
  - 
  - • for NV operating simultaneously with Hornsea 3 and
  - 
  - • for NV operating before Hornsea 3.
5. The real and unacceptable problems generated by significant increases in HGV traffic on this section of rural lane were set out clearly **in 2014 when an Appeal for an Anaerobic Digester was dismissed by the Planning Inspector. We have attached a copy of the Appeal decision to this submission.**
  6. In this same Appeal decision, significant reference was made to the unacceptable severe adverse impacts that would be generated for the residents of **The Old Railway Gatehouse**. (A point of information - the ownership of The Old Railway Gatehouse has changed since the Appeal). OPC are as yet unaware of any proposals forthcoming from Vattenfall as to how these impacts are to be mitigated.
  7. In addition to the above traffic issues, the Parish Council remains concerned about the **core working hours** of the construction project, and the likelihood of **noise and light pollution** from both the Cable Logistics Area and the Mobilisation Area. OPC was disappointed at the ISH on 5/2/19 to hear that the Applicant is still requesting hours involving **a very long working day** and a 7am start, while appearing to prevaricate on the issue of **a mobilisation period** which would inevitably involve staff and HGV vehicle movements **outside those hours** at both ends of every day. Such arrangements would impact significantly and unacceptably on the residents of the north-eastern end of Link 68 ('Little Oaks' and Docking Farm Cottages on Heydon Road) and on The Old Railway Gatehouse.

Finally, whilst the Parish Council welcomes the early design decision by Vattenfall to proceed with HVDC transmission, we remain concerned about the possibility of Electro-Magnetic Field effects at the **cable crossover point** with the other project - especially if Orsted eventually settle on HVAC transmission. The fact that the design of the cable crossover point is currently covered by a Non-Disclosure Agreement between Orsted and Vattenfall would seem to be militating against proper scrutiny of these issues by the Examination process of both projects.

Paul Killingback  
Chair  
Oulton Parish Council





## Appeal Decision

Hearing held on 9 April 2014

Site visit made on 9 April 2014

**by Susan Holland MA DipTP MRTPI DipPollCon**

**an Inspector appointed by the Secretary of State for Communities and Local Government**

**Decision date: 11 June 2014**

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**Appeal Ref: APP/K2610/A/14/2212257**

**Oulton Airfield, The Street, Oulton, Norfolk**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
  - The appeal is made by Black Bridge Energy Ltd against the decision of Broadland District Council.
  - The application Ref 20130860, dated 28 June 2013, was refused by notice dated 6 November 2013.
  - The development proposed is an anaerobic digestion renewable energy facility, associated landscaping and vehicular access.
- 

### Procedural Matters

1. Notwithstanding the description of the proposed development as stated on the application form, the development is described on the Council's decision notice and on the Appeal form as a *biomass renewable energy facility*. It was confirmed at the Hearing that the development is designed and intended to process purpose-grown crops of maize and grass, and is neither designed nor adaptable to process food waste. The description given on the decision notice and on the notice of appeal is more accurately representative of the proposal, and the appeal is dealt with on the basis of the description as amended.

### Decision

2. The appeal is dismissed.

### Main Issues

3. The main issues are the effects of the proposed development (a) upon highway safety and convenience; and (b) upon the living conditions of neighbouring residents at The Old Railway Gatehouse with reference to noise and disturbance; in each case arising from the proposed vehicular movements to and from the site.

### Reasons

*Issue (a): Highway Safety and Convenience*

4. The appeal site is located on land to the rear (west) of an existing turkey farm comprising around a dozen large poultry houses, and to the south-west of a farm depot for crops (peas, beans, barley, wheat, potatoes, sugar beet, and carrots) grown on the surrounding agricultural land. These establishments have separate accesses to Oulton Street (the lane). The proposed biomass

- plant would have its own separate access to the lane, taken from an existing hard-surfaced track. Adequate new visibility splays at the access junction with the lane have recently been formed, by the repositioning of a hedge and fence.
5. In addition to the turkey farm and the agricultural depot, the lane serves the neighbouring residential settlement, also known as Oulton Street (Oulton Street), and the village of Itteringham to the north. For these settlements and for the existing enterprises, the lane serves as the means of access to the B1149 Holt Road. The appeal scheme would add, to the traffic generated by these sources, the traffic associated with the proposed biomass plant.
  6. The biomass plant would be fuelled principally by a purpose-grown maize crop – by a particular variety of maize grown for its properties as a fuel crop. Grass and rye would form alternative/additional feedstocks. This restricted range of material would ensure the required consistency of fuel input. The maize would take a place in the normal rotation of food and fodder crops grown on the 10 subscribing farms: the number sufficient to produce a regular harvest, each year, of the overall quantity required to fuel the anaerobic digestion plant. Harvested maize would be transported to the appeal site and stored in silage clamps. The by-products of the energy generation process, in the forms of solid digestate fertiliser and liquid fertiliser, would be returned to the subscribing farms and to the land.
  7. On an annual basis, 30,000 tonnes of input biomass would be delivered to the site, by tractor and 15-tonne trailer units. 17,500 tonnes of liquid biofertiliser would be transported from the site in 27-tonne tankers. Additional movements would be required for the removal of solid digestate fertiliser. Some removal of the solid digestate could take place in the empty trailers, so saving on movements; but the overlap would be limited, and outgoing movements would take place throughout the year. However, the maize harvest itself would be concentrated into a 2-month period of the year, in September-October, and the grass harvest, somewhat earlier, from June to early August. During the harvest period, tractor/trailer movements would be frequent, at about 8 trips per hour (4 in, 4 out) over a continuous 10hr-14hr day.
  8. Though 2 cars may pass each other, if driven with care, over much of the lane, the carriageway is not wide enough for a vehicle larger than a car to pass any other vehicle except at the existing informal 'passing places'. These have been formed over time by overrunning and consequent erosion of the low banks and grass verge. (There is no footway on the lane). Approximately halfway between the site access and the junction with Holt Road the lane bends sharply, preventing visibility between the passing places on either side of the bend. Elsewhere on this stretch, the lane runs straight and visibility is good. At the point where a former railway line crossed the lane, now marked by a broad elevation or 'hump' in the surface, stands the cottage known as The Old Railway Gatehouse.
  9. The proposal is to formalise several of the existing 'passing places', and to reposition and/or create others, to provide 6 individual passing places in all. The Highway Authority is satisfied that, subject to some repositioning, 6 passing places would meet the need; that opposing HGV tractor/trailer units would be able to pass each other at the new passing places; and that intervisibility between passing places would be adequate.

10. It is acknowledged that in this highly agricultural area, some movement of crops in large vehicles - tractor/trailer combinations, tankers, or other HGV - is 'normal' and to be expected by other road users. Nevertheless, the traffic movements generated by the appeal proposal would be problematic for the following reasons. Firstly, they would be very frequent and concentrated on this particular stretch of lane over a period of several months each year. Secondly, during that time the movements would continue at high frequency over a very long working day, extending from early morning until late evening, and into periods of dusk and darkness. Thirdly, the existing mix of traffic on the lane, revealed by the surveys submitted with the transport assessment, includes domestic cars, agricultural vehicles, tankers and other HGVs: the existing turkey farm and agricultural depot themselves generating HGV traffic.
11. Fourthly, each passing place proposed would not be long enough to contain more than 1 HGV at a time: so that the driver of any vehicle following one of the Appellant's tractor-trailer units would have to anticipate, accurately, the arrival of an opposing vehicle in order to avoid being left facing such a vehicle on the narrow part of the lane. In such cases the only option would be to reverse the length of the previous stretch, to gain refuge in the earlier passing place: a manoeuvre which would be difficult for some drivers and for the drivers of some large vehicles, including tractor-trailers, and particularly in conditions of poor light, dusk and darkness. The consequences of a mistake could be especially severe in the area around the passing place closest to the junction with the B1149 Holt Road. Here, northbound traffic positioned on the B1149 ready to turn right into the lane could be left stranded and exposed in that position while waiting for 2 HGVs to pass on the lane itself close to the junction, and would be unable to exit the B1149 whilst the first passing place was still occupied; or, worse, might turn into the lane unaware that a HGV was about to exit.
12. The proposed arrangement would markedly intensify and exacerbate the difficulties presented by the current arrangement, in which the drivers of vehicles are obliged to engage in a form of 'musical chairs' or 'running the gauntlet' on the narrow lane. The provision of more formal passing places would neither eliminate nor sufficiently ameliorate the consequences of the proposed increase in traffic movements of the most problematic form of vehicle and at the most problematic times.

*Conclusion on Issue (a)*

13. The conclusion is therefore that the proposed development would be likely to result in material harm to highway safety and convenience. The proposal would fail to comply with statutory saved Policy TRA14 of the Broadland District Local Plan Replacement 2006 in that it would *endanger highway safety [and] the satisfactory functioning of the highway network*; with companion Policy GS3(d) in respect of highway safety; and with the National Planning Policy Framework (the Framework) at paragraph 32, in that despite the proposed improvements to the highway network the cumulative impacts of the proposed development would be *severe*.

*Issue (b): Living Conditions at The Old Railway Gatehouse*

14. The current occupier of The Old Railway Gatehouse initially objected to the appeal proposal, but has since withdrawn her objections following receipt of an e-mail dated 4 April 2014, in which *Philipp Lucas, on behalf of Blackbridge*

*Renewable Energy Ltd, confirmed agreement to buying my property, should the above appeal be successful.* Firstly, however, no legal agreement has been submitted to ensure the purchase of the property, and it could not be made the subject of a condition on any planning permission that might be granted. Secondly, the factors relating to living conditions would apply no matter who might be the residential occupier of the property: and so the issue would be likely to continue to arise even after such purchase.

15. The Old Railway Gatehouse is a small, single-storey building positioned directly adjoining the verge at the carriageway edge, and immediately adjacent to the raised platform in the carriageway which marks the route of the former railway. The windows to all habitable rooms either, in the front elevation, face directly onto the carriageway or, in the side elevations to the dwelling, face up and down the lane at close quarters to the carriageway edge. The only window which faces the rear garden is a small window belonging to a bathroom. (There is also a skylight in the open roof to the main living-room/kitchen).
16. The existing windows are double-glazed. Even so, during the site visit the sound of each vehicle which passed the cottage was clearly audible indoors with the windows closed. These vehicles were cars. Sounds of the proposed tractor-trailer units, whether laden or not, would be likely to be louder and to be perceived as disturbances. Their frequent occurrence as separate bursts of loud sound, including vibration with passage over the 'hump' in the carriageway, over long periods of the day from early morning to late in the evening at harvest time, would be likely to be a source of genuine disturbance.
17. Whilst acknowledging that when superimposed upon the existing pattern of traffic movements on the lane, *noise from [up to 8 vehicle movements per hour] would be perceived as a series of separate events rather than a continuous noise*, the Appellant insists upon an approach which works by averaging surveyed noise levels over time. On the basis of an 18-hour average ( $L_{Aeq}$ ), the predicted increase is calculated to be 3dB(A) and so said to be 'minor'. The Council has followed an approach which emphasises peak flows, with the proposed 8 tractor-trailer movements per hour to be added to existing flows, and uses the  $L_{max}$  measure: in this way the Council calculates that there would be an increase of 7dB(A), which would be noticeable and intrusive. In assessing the magnitude of the noise impact, therefore, the Appellant and the Council disagree.
18. The Appellant's submitted noise evidence has been prepared using perfectly conventional measurements and numerical representations of noise. However, such representations inevitably incorporate some degree of statistical smoothing: and so in themselves understate the effects, upon the human receptor, of separate, sudden bursts of sound which conventional practice recognises to be potentially disturbing. Where such bursts of sound – as in the proposed passage of heavy tractor-trailer units – are not continuous but are frequent and regular, the human response is to expect, predict or anticipate the interruption, so that the anticipation itself adds to and prolongs the disturbance when it comes. Thus, the response is not only to the increased level of noise, but includes the anticipation of the increased noise. The presence of the hump in the road outside the Old Railway Gatehouse would intensify the bursts of sound and their suddenness.
19. Recently-issued national Planning Practice Guidance on noise does not rely upon numerical measures but on qualitative descriptors. *Noticeable* noise

ranges from *noticeable and intrusive* noise, which can be *mitigated*, to *noticeable and disruptive* noise, which should be *avoided*. The first *causes small changes in behaviour ... e.g. speaking more loudly; where there is no alternative ventilation, having to close windows for some of the time because of the noise*. The second *causes a material change in behaviour .. e.g. avoiding certain activities during periods of intrusion; where there is no alternative source of ventilation, having to keep windows closed most of the time because of the noise. ... Quality of life diminished due to change in acoustic character of the area*.

20. Having visited the interior of The Old Railway Gatehouse, listened to the sound of passing traffic on the lane, and observed the layout of the property, the nature and position of the windows, and the condition of the lane, I have no doubt that the levels and character of the traffic noise generated by the appeal proposal during periods of harvest would be at the very least *noticeable and intrusive*, and almost certainly, at times, *noticeable and disruptive* as perceived by any residential occupiers of the dwelling. The property already has double glazing: so that there is no mitigation which could be easily specified as part of a planning permission. It is possible that an alternative interior layout of the dwelling might provide appropriate mitigation: but such action is beyond the scope of conditions upon a planning permission and there is no evidence that it could be achieved.

#### *Conclusion on Issue (b)*

21. The conclusion is therefore that the proposed development would, on balance, be likely to result in material harm to the living conditions of residential occupiers of The Old Railway Gatehouse with reference to noise and disturbance. The proposal would fail to comply with the requirements of statutory saved Policy GS3(d) of the Local Plan that the surrounding highway network should be able to *accommodate the traffic likely to be generated without significant detriment to the amenity of nearby occupiers*.

#### **Other Matters**

##### *Noise (other sources) and Odours*

22. As part of the appeal site visit, the site of an existing biogas plant of similar construction, at Spring Farm, Taverham, was also visited. Odours are said to have been a problem at that site: however, it was not demonstrated that the biogas plant itself was the source. At the time of the visit the Spring Farm site was odour-free. The digestion process itself is contained within the dome of the tank; the gas produced is said to be odourless; and the silage clamps have a smell similar to other such installations on farms.
23. The turbines themselves are noisy, but they are contained within a well-insulated building. Extractor outlets also produce a noise which might carry; but the proposed layout would place buildings between these and any potential residential receptors in the settlement of Oulton Street.

##### *Character of the Area*

24. The surrounding area is rural and largely agricultural in character. The immediate surroundings include a number of extensive agricultural buildings, including the adjacent cluster of turkey sheds and, not far beyond, the buildings of the agricultural depot. From the site boundary, other large farm

buildings are visible. The proposed anaerobic digestion plant would be marginally higher than these, but any visual impact would be lessened by the adjacent tree belt and, from the available viewpoints, perspective would have the effect of reducing its apparent height.

25. The site occupies part of a former airfield. The National Trust claims that this is a heritage asset; and also cites links with the Grade 1 Listed Building of Blickling Hall. The Hall is separated from the site by several kilometres and by intervening woodland: so that the proposal would have no visual impact upon it. As for the airfield, though the turkey sheds have been built upon parts of it, the runway layout continues to be reflected in the arrangement of field boundaries and tracks, and is clearly visible in aerial photo representation. The appeal proposal would not interrupt that layout, but would occupy one of the fields. No evidence has been submitted sufficient to demonstrate that the appeal proposal would interfere irreparably with the historical authenticity of the airfield.

#### *Renewable Energy Policy*

26. The proposed biogas plant would generate clean, renewable energy from local biomass: sufficient energy (electricity) for around 4,000 homes. The Framework states clearly, at paragraph 97, that *to help increase the use and supply of renewable and low carbon energy, local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources;* and at paragraph 98 that *they should recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions.*
27. In this case the Council has, in its approach to the proposal, complied with the requirements of the Framework, and has acknowledged the contribution of the proposal to providing renewable energy. The Council has granted planning permission for other such developments locally, including those put forward and operated by the current Appellant. However, in stating that *local planning authorities should ... approve the application (unless material considerations indicate otherwise) if its impacts are (or can be made) acceptable,* the Framework necessarily and appropriately qualifies its encouragement for renewable energy development. The Council's refusal of the current proposal is based upon the impacts of the traffic generated by it, and to that extent the proposal would not comply with the provisions of the Framework.

#### **Overall Conclusion**

28. Whilst some relevant matters are in favour of the proposal or at least neutral in their effect upon it, these are both individually and collectively insufficient to outweigh the conclusion based upon consideration of the main issues: which is, on balance, that the appeal should be dismissed.

*S Holland*

INSPECTOR

## **APPEARANCES**

### **FOR THE APPELLANT:**

Mr Trevor Ivory	Solicitor, of Howes Percival, Norwich
Mr Alan Presslee	of Cornerstone Planning Consultants, Cringleford
Dr William Mezzullo	Associate Director, Project Development at Future Biogas
Mr Jon Myhill	of Future Biogas
Mr Adrian James	Noise Consultant, of Adrian James Acoustics Ltd, Norwich

### **FOR THE LOCAL PLANNING AUTHORITY:**

Ms Ruth Sainsbury	Senior Planning Officer, Broadland DC
Mr Graham Parry	Noise Consultant, Accon UK Ltd, Aldermaston
Mr John Shaw	Senior Highways Engineer, Norfolk County Council
Cllr Claudette Bannock	Councillor (Taverham South ward), Broadland DC

### **INTERESTED PERSONS:**

Mr Paul Killingback	Chair, Oulton Parish Council
Ms Alison Shaw	Former Chair, Oulton Parish Council
Mr Sam Booker	Local resident, Oulton Street
Ms Anne Roy	Local resident, of The Old Railway Gatehouse

## **DOCUMENTS**

### **Documents submitted by the Appellant**

- 1 Appeal Decision APP/K2610/A/13/2195384 Reepham Road, Felthorpe
- 2 Completed S106 Planning Obligation by Saltcarr Farms Ltd and Black Bridge Energy Ltd

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**Subject:** VATTENFALL NORFOLK VANGUARD - Registration identification number: 20012656 Oulton Parish Council  
**Date:** 12 March 2019 22:18:24  
**Attachments:** [Vattenfall Deadline 4 VISSIM screen prints.docx](#)

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OPC welcome the opportunity to give an update at Deadline 4 on potential cumulative impact issues from Hornsea Three and Norfolk Vanguard projects at Oulton.

### **Cumulative Impact**

OPC has recently been able to view a VISSIM modelling Video of potential traffic scenarios as put forward by Orsted Hornsea Three. This was produced by Traffic Consultants employed by Orsted. OPC has been able to comment on this at a recent Issue Specific Hearing for Orsted Hornsea Three in Norwich on 8<sup>th</sup> March 2019.

The VISSIM data formed part of a document that was submitted to PINS by Orsted (*EN010080-001638 Appendix 8 Main Construction Compound Access strategy VISSIM modelling update*)

It has become apparent that the scenario of existing traffic together with that from Hornsea Three and Norfolk Vanguard will have serious implications *even with* the road intervention schemes as proposed by Orsted. The VISSIM modelling was used to produce the data to demonstrate potential delays compared to the current situation caused by the increase in HGV's and other vehicles associated with both projects travelling along B1149/The Street.

OPC includes within this submission a few key screen prints to illustrate scenarios and some issues with the modelling. The gaps in the data used for the modelling and errors are being highlighted to Orsted and the PINS Panel but OPC believes that this modelling actually serves to demonstrate the likely *adverse* effects of two significant projects attempting to use The Street to access their respective compounds.

The worst traffic delays were when abnormal loads left the Hornsea Three Main Construction Compound along The Street to B1149 junction. In this scenario *all* traffic was stopped from travelling north along The Street whilst the abnormal load travelled south. Meanwhile, all traffic on the B1149 was *stopped in both directions*. The abnormal load exited onto the B1149 with the queue of traffic that had built up behind it. When all traffic from The Street had exited the held traffic on B1149 was released. The observed delay for traffic on B1149 was 5mins 42 seconds.

Orsted has proposed to store and then deliver all of their cable drums at their main Construction Compound some *1,121 cable drums over the 30 months of their active construction time* for the cable route. *OPC has been told that all of these cable drums will arrive and depart as abnormal loads.*

There are other scenarios that have been modelled and OPC strongly feel that even with the mitigation measures proposed by Orsted, there will be significant, regular delays, pinch points and potential dangers to all road users.

In light of the cumulative impact projections, OPC questions how Vattenfall Norfolk Vanguard will be able operate effectively along The Street with *no* mitigation measures similar to those proposed by Orsted, without significant highway disfunction.



Have Vattenfall factored any of the detailed HGV and Abnormal Load information from Orsted into their estimates?

Have Vattenfall conducted any similar traffic modelling of potential traffic delays from cumulative traffic impact data?

Finally, OPC note that Vattenfall Norfolk Vanguard are **NOT** proposing to use trench-less crossing (HDD) at the point where the cable route crosses the B1149. OPC believes that section of the road is not wide enough to create single lane-controlled traffic movements safely. It is a busy well used route to and from Norwich. Given that the traffic for both projects will be accessing this section of road how will this be managed without serious traffic delays affecting the wider road network?

There was a suggestion that if both projects were working beside each other at the same time where both projects cross or share access routes then one or other would halt their work to let the other progress by agreement. This doesn't take into consideration the effect on existing traffic which will include farm traffic, especially at harvest times throughout the year. Only recently, Street Farm, Oulton secured planning permission (BDC ref 20180491) for a 2200 tonne boxed potato store that will generate significant additional HGV traffic along The Street. Tourist traffic and residents would be inconvenienced by lengthy detours if there are road closures at this point.

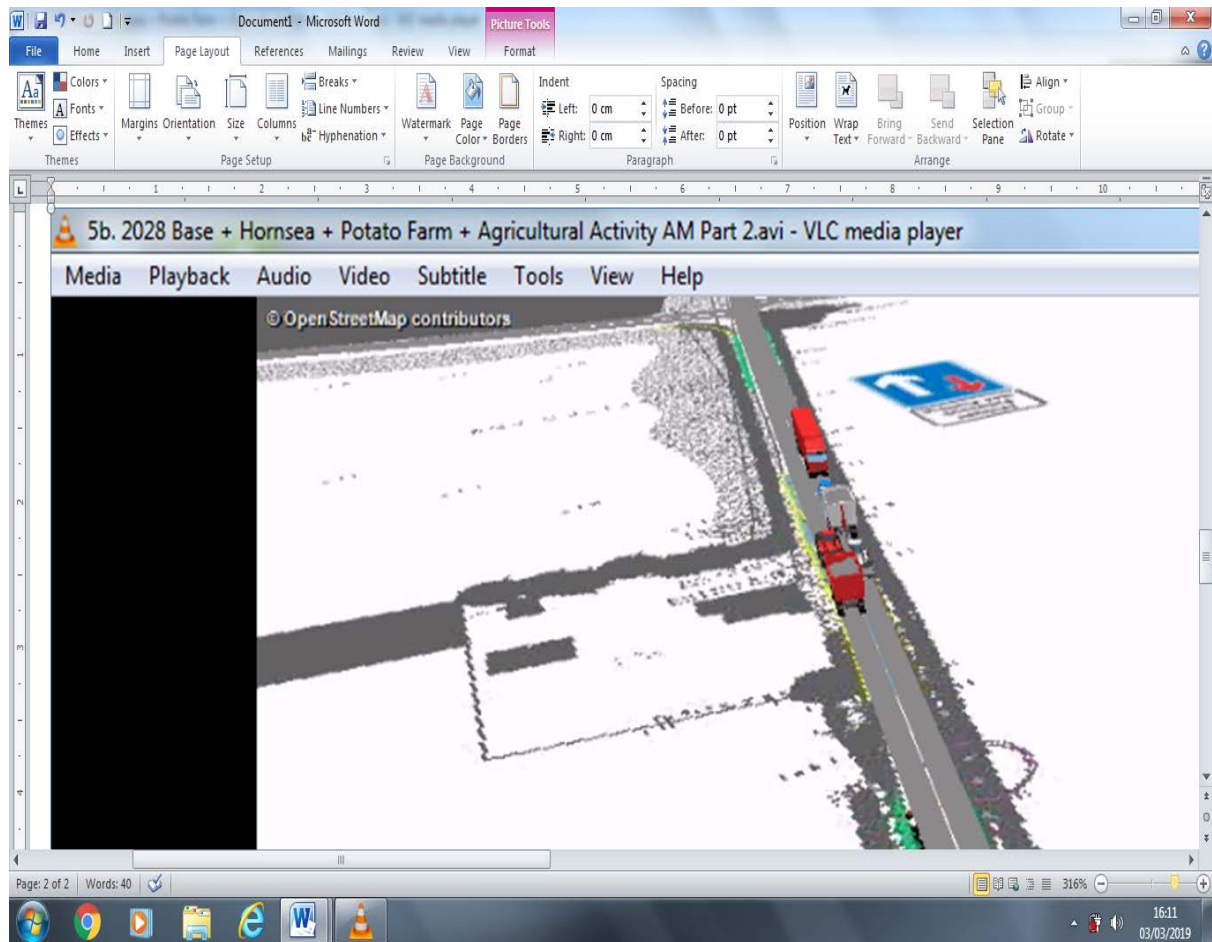
OPC would urge the applicant to reconsider this decision not to use HDD at this location and understand that NCC Highways are also very concerned about this aspect.

Paul Killingback

Chair

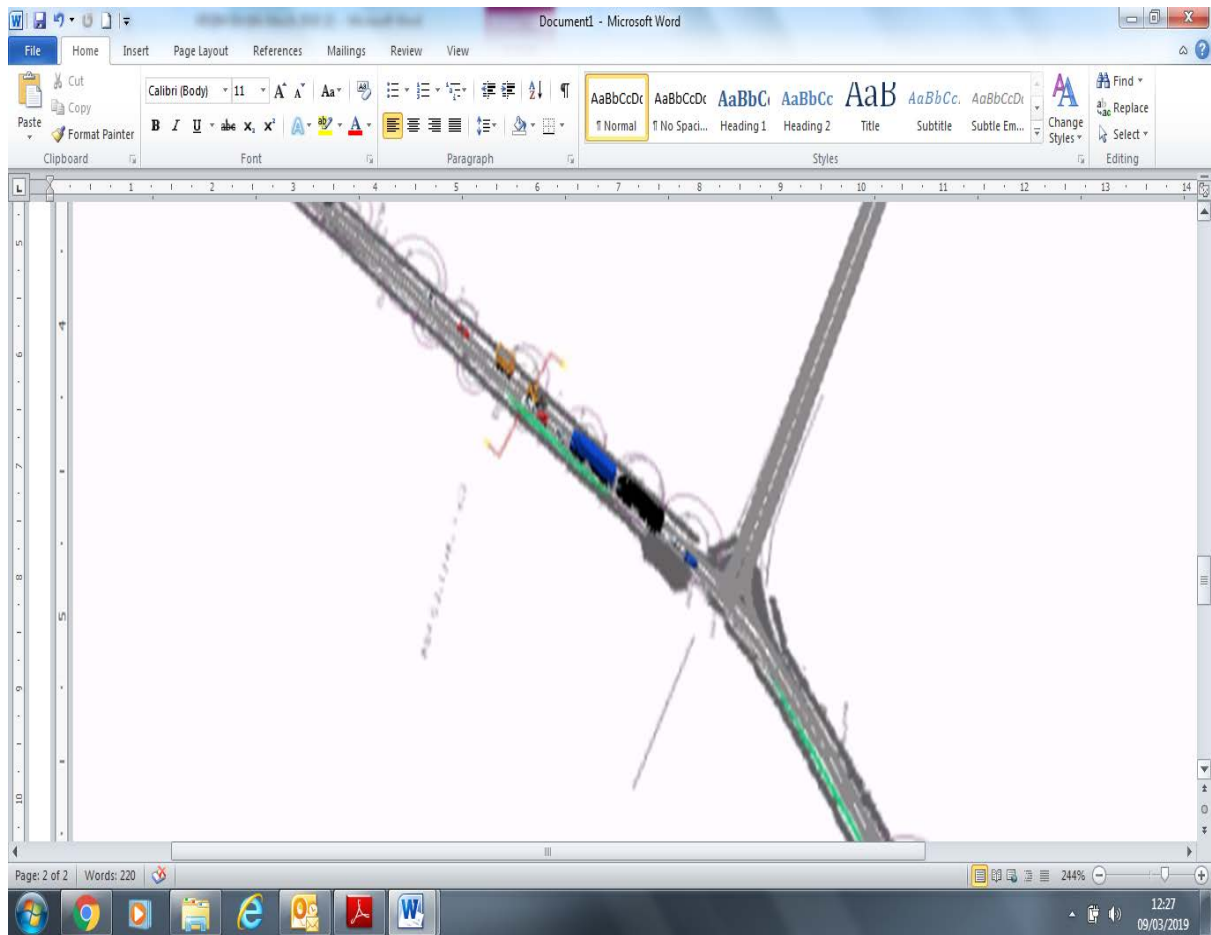
Oulton Parish Council

## VISSIM modelling screen prints.



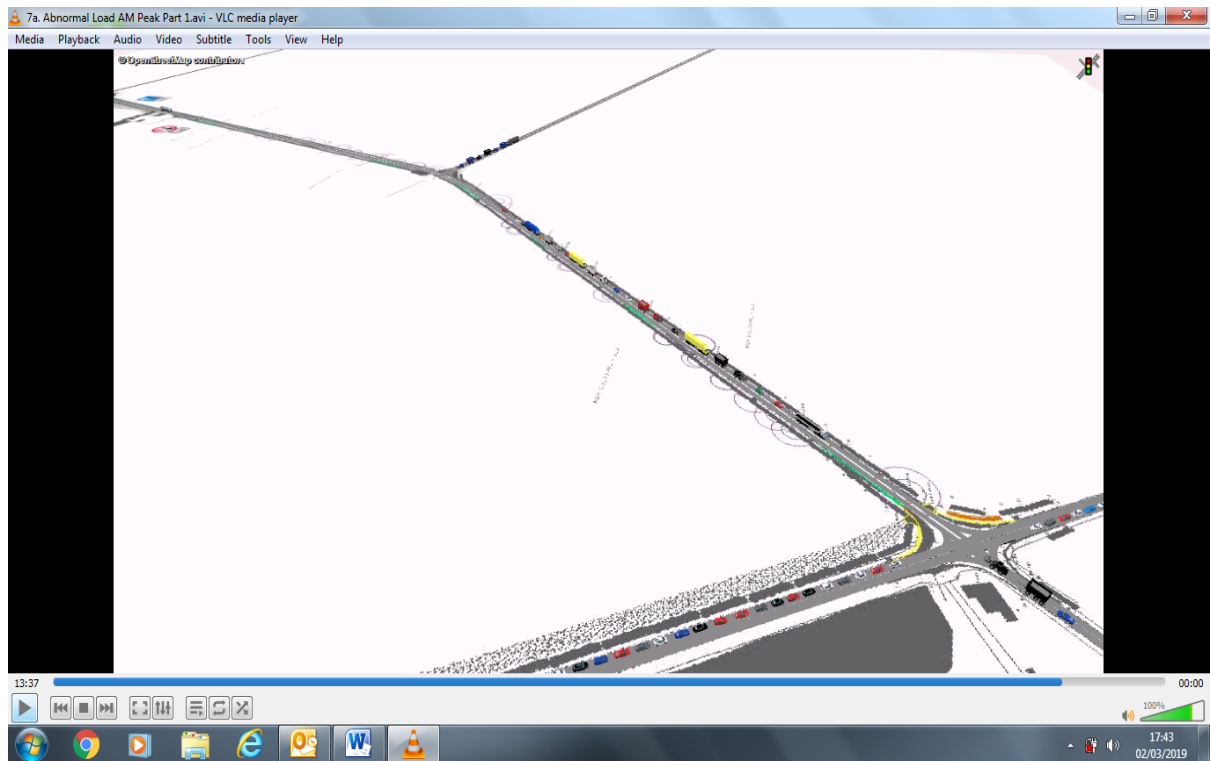
**(Screen print 1)** Traffic did not adhere to the road intervention schemes.

Location shown- The Old Railway Gate House. Orsted propose the road hump is graded with one-way priority signage. In this illustration traffic has ignored priority signs and tried to pass at the old railway hump. This part of the road is very narrow and is impossible for two vehicles to pass each other. Vattenfall have not proposed any changes to this location and OPC wonders how cable delivery vehicles will cope with this hazard.



(Screen print 2) Location shown – The Street at the entrance to Docking Farm. Passing places to be constructed by Orsted (shown in green) unable to accommodate all traffic if there were several vehicles following each other.

Vattenfall have not proposed any changes to the road. The amount of existing traffic together with the Orsted volumes would make the Vattenfall 'pilot vehicle' approach unrealistic.



(Screen print 3) Abnormal load leaving **Orsted Hornsea Three's** Main construction compound along 'The Street' to B1149. NOTE: - Traffic held on B1149 in both directions for well over 5 minutes, with significant highway safety implications [bottom of screen print]. Traffic tailing back in an easterly direction towards a hump back bridge where the stationary traffic will not be seen by approaching fast moving traffic. This is also the part of the road that Vattenfall propose NOT using HDD to cross it thus adding to disfunction and danger.

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**Subject:** VATTENFALL NORFOLK VANGUARD - Registration identification number: 20012656 Oulton Parish Council  
**Date:** 20 March 2019 15:55:03  
**Attachments:** [Appendix 1 D5 PKVattenfall traffic numbers.xlsx](#)

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## Vattenfall Norfolk Vanguard

### **Oulton Parish Council's submission at Deadline 5**

Oulton Parish Council (OPC) wish to comment on the Deadline 4 responses received by PINS, as part of its Deadline 5 submission, in relation to traffic and transport issues generated by the project in and near the parish of Oulton.

OPC agrees with the view of Broadland District Council (BDC) in regard to the Planning Inspectorate Appeal Decision for the AD plant in 2014 (PINS ref: APP/K2610/A/14/2212257) and its relevance to this project. OPC maintain that the traffic numbers proposed by Vattenfall and Hornsea Three will have serious implications for the flow of traffic along The Street, even with the proposed road intervention schemes.

Hornsea Three have put forward a road intervention scheme which OPC understand that NCC is requesting should be implemented by either Norfolk Vanguard (NV) or Hornsea Three (HOW3) depending on which project goes first. OPC seeks clarification from NV as to whether it agrees to implement the whole road intervention scheme proposed by Hornsea Three, if indeed it is NV that moves into construction first.

### **OPC would prefer the management agreement between the two parties relating to the intervention schemes, and their decommissioning, to be part of the DCO.**

There are however problems with the road intervention scheme which, although allowing HGVs and Abnormal Loads to access The Street, fails to remove the existing pinch points along the 1km stretch of road, given the higher volume of traffic. This was clearly illustrated in OPC's Deadline 4 submission with VISSIM screen-prints.

1. **The Old Railway Gatehouse 'hump'**. The applicant has stated that they will implement the same road intervention schemes and the mitigation for the Old Railway Gatehouse as proposed by Orsted Hornsea Three, but to date have not documented this.

There needs to be clarification on what road intervention measures will be included if only Vattenfall proceeds. The applicant originally did not propose any road scheme, only a localised 'pilot vehicle management' approach.

OPC would want to ensure that The Old Railway Gatehouse would still obtain full mitigation measures given that the traffic produced for Vattenfall in isolation would still contribute a substantial increase to existing traffic on The Street.

After the re-grading and smoothing of the hump, the road will remain the same width with priority signage. Only one vehicle will be able to cross at a time. The re-surfacing of the road has been put forward as mitigation by Orsted as a residential amenity issue to reduce the noise levels at The Old Railway Gatehouse but it should be noted that the smoothing of the hump is also to prevent grounding of HGV low loaders.

It remains unclear whether the re-grading of the road hump is only to facilitate site access rather than improving residential amenity, given that the priority signage could easily lead to *increased* noise events for the residents, due to traffic - specifically HGVs - slowing, stopping and starting within close proximity of the Gatehouse.

Clearly, OPC seeks continuity of approach where two projects are accessing the same routes with similar volumes of traffic and timescales, especially given the higher percentage of HGVs. OPC understand that there is continuing dialogue between Orsted & Vattenfall but it is still unclear how each project will interact at a

number of points along The Street. The crossroads of Heydon Road with The Street, to be used by both Vattenfall and Orsted's Main Construction Compound entrance, is a key pinch point.

The section of road immediately to the south of this crossroads is extremely narrow. Will there be some sort of traffic control at the crossroads to allow for large HGVs to turn onto The Street safely before travelling south to B1149?

OPC have not seen any evidence that Vattenfall has taken competing agricultural traffic into consideration. The large adjacent agribusinesses (Street Farm, Saltcarr Farm, Hook2Sisters poultry farm) produce an enormous amount of harvest and HGV activity. Has Vattenfall completed any sort of traffic analysis on the local road network and specifically during the sequential harvest periods of cereals, beans, potatoes, maize, carrots and sugar beet? These harvesting processes continue relentlessly throughout the months from July until after Christmas.

2. **LINK 68:** OPC still question how each project will interact with each other's traffic. It is noted that the B1149 is the main route to Link 68. Vattenfall are not proposing trench-less crossing (HDD) at the point where it crosses the B1149. OPC maintain that the B1149 is not wide enough for a single lane closure and traffic control, therefore an open trench crossing would generate a road closure scenario. NCC and other interested parties have indicated strongly the need to use trench-less crossing at that point. Given the cumulative traffic using this route to Link 68 and HOW3 Main construction compound, how will this section be managed if there is a need to close the B1149? Where will traffic be diverted to?
3. **Link 75:** Vattenfall are proposing a 'pilot scheme' along the Blickling Road.

**11.39 (Applicants response to ExA written questions)**

***The OTMP (document reference 8.8), Section 1.7.1. sets out the principles for managing construction HGVs on minor routes where two-way HGV traffic is constrained. Link 75 (B1354 – Blickling) is identified as one of these constrained routes and a 'pilot vehicle' strategy is identified to manage the peak demand of 4 HGV movements an hour. The final traffic management plan (TMP) will be produced post-consent which will accord with the principles set out in the OTMP. This is secured through Requirement 21.***

This link is of some considerable length with few obvious off road pull-ins or turning spaces. OPC queries how a 'pilot vehicle' strategy will work along this heavily used link road between Aylsham and North Norfolk. There are a number of large agribusinesses operating along this route and it is a significant feeder route to Blickling Hall. The Blickling Road is notorious for consistent and numerous accidents along it, not all reported, but noted by local residents. So far in the 3 months of this year there have been two, one near to The Tower on the Blickling 'bends' and the other at Blickling Church, demolishing (yet again) the church graveyard wall.

The Applicant's statement above that " the final traffic management plan (TMP) will be produced post-consent " *is entirely unsatisfactory*. The use of Link 75 needs to be thoroughly assessed during the Examination process and the results scrutinised by the ExA.

#### 4. Cable Logistics area

**11.39 (Applicant's response to ExA written questions):**

***The Applicant refers to its response to first written questions Q11.25 (ExA; WQ; 10.D1.3) which details the purpose of the Cable Logistics Area. It is the Applicant's preferred strategy to deliver cable drums and associated materials directly to the joint locations from the supplier, and that the cable logistics area will seek to provide 'buffer' storage only should delivery or installation issues arise. For context, if 100% of the cable drums had to be delivered to the Cable Logistics Area prior to installation, and all cables are installed within a single year (single phase cable pulling as the worst case), this would represent an average of***

***two cable drum deliveries per day (four HGV movements)***

OPC are concerned that the applicant has given a scenario above of 100% of all cable drums going to the Cable Logistics Area. This is not what we have been told so far, and OPC seeks clarification on whether or not the Cable Logistic Area is about to become a central hub for all cable deliveries?

***Q:11.39 (applicant's response to ExA written questions)***

***The Cable Logistics Area will also include a temporary site office, welfare and space for the storage of other materials associated with cable jointing such as cable joint kits and cement bound sand.***

***For the cable pulling phase, a conservative assumption of three HGV deliveries per day (six HGV movements) is considered for these requirements. Therefore, for context, the total daily HGV deliveries (cable drums and associated material) based on a conservative worst case can be considered to be up to 5 per day (10 HGV movements per day). A conservative assumption of up to 20 employee vehicles per day at the Cable Logistics Area is also provided for context.***

OPC is surprised by the use of the term “conservative” three times in the extract above. Is it not a *maximum design* worst case scenario that the ExA should be scrutinising - not one based on “conservative” estimates?

For the cable pulling phase OPC were given numbers of HGV movements that have been tabulated (see attached **Appendix 1**). OPC seeks clarification as to whether these HGV traffic numbers are included in overall traffic numbers within Link 68, or in addition?

5. Finally, OPC would like to revisit an as yet unanswered point in its Deadline 3 submission: Point 7 (Core Working Hours). OPC have been recently made aware that Orsted appear to be proposing **evening and night-time deliveries to their compound** – outside of core working hours. OPC is seeking clarification on this important point, but would like to know if Vattenfall also will be making any ‘out of hours’ deliveries to and from the Cable Logistics Area (for example, cable drum deliveries).

**Appendix 1 - Table of estimated Vattenfall HGV Movements to/from Cable Logistic area.**

Paul Killingback

Chair  
Oulton Parish Council







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**Subject:** Fwd: VATTENFALL NORFOLK VANGUARD - Registration identification number: 20012656 Oulton Parish Council  
**Date:** 05 April 2019 15:45:16  
**Attachments:** [OPCPINS\\_OrstedDeadline 7- P.pdf](#)

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## **Oulton Parish Council's submission at Deadline 6**

VATTENFALL: Norfolk Vanguard

Since the last deadline, Oulton Parish Council (OPC) has attended an Accompanied Site Inspection (ASI) on March 25th, an Issue Specific Hearing on March 27<sup>th</sup> and a Working Group meeting with the Applicant in Oulton, also on March 27<sup>th</sup>.

As a result, OPC would like to make the following points:

1. Because of time constraints during the ASI, the Panel were unable to visit the whole length of Link 75 – the Blickling/Saxthorpe road. OPC would like to suggest that, on another occasion, the Panel travel the whole length of Link 75 from Aylsham to Saxthorpe, in order to observe at first hand the pinch points, narrow sections of roadway, right-angle bend and weak bridge. During the active construction period of the project, it is proposed that 72 additional HGV movements will occur daily along this highly unsuitable stretch of rural road.

2. During the ISH on March 27<sup>th</sup>, the ExA requested that the Applicant submit at Deadline 6 the VISSIM Appendix 8 – Main Construction Compound Access Strategy document that was submitted for the Hornsea Project Three (HOW3) examination process. Although we are aware of already having raised some issues arising from this VISSIM exercise at an earlier deadline for Norfolk Vanguard (NV), we submit at Appendix 1 (attached below) a copy of our *full* submission for Hornsea Project Three at their Deadline 7.

2.1 We attach this document because it contains a detailed description of the inadequacies of the baseline data used to construct the modelling of the access road in the simulation, and the serious nature of the inaccuracies that flow from that. We are forced therefore to challenge the validity of the data and conclusions that Hornsea Project Three have chosen to extrapolate from that simulation.

2.2. OPC's Hornsea Three submission at Deadline 7 also contains our analysis of the traffic implications of the Abnormal Indivisible Loads (AILs) that will be generated by HOW3 as their cable drums travel up and down the access route, shared with Norfolk Vanguard on Link 68. Although NV's cable drums will be smaller, the relentless regularity of Hornsea Three's competing AIL deliveries to their Oulton compound will have a major impact on the ability of Norfolk Vanguard to pass smoothly up and down the access route.

3. In view of Action Point 9 from the ISH ("mitigation measures for noise and vibration for the Old Railway Gatehouse"), Appendix 1 may also be of interest to the ExA as it contains – at Section 2 – OPC's comments on HOW3's Noise and Vibration Assessment at the Old Railway Gatehouse. Cross-reference is made to the comments on this issue by the Planning Inspector in 2014, when dismissing the Appeal for an AD.

3.1 OPC is unaware of any independent noise and vibration assessment carried out by NV

and queries whether it is safe or reasonable to rely on another project's flawed assessments.

4. The Parish Council is similarly concerned about the apparent lack of an air quality assessment. Neither project has seen fit to carry out such an assessment for the residents of the Old Railway Gatehouse, who will be severely impacted by HGV particulate emissions for the entire duration of both projects – **with the anticipated cumulative HGV traffic increase estimated between 487% and 548% by the two project teams.**

4.1 OPC raised the point at the ISH on 27<sup>th</sup> March 2019 that an air quality assessment had not been carried out for LINK 68. The applicant replied that this *had* been carried out and detailed in the cumulative impact assessment, which was submitted at Deadline 5.

OPC would like to point out that *LINK 68 has been omitted* and did not feature either in previous air quality assessments or in the updated CIA for deadline 5. If we are mistaken, then we seek clarification from the Applicant and request that they direct us to the appropriate documentation.

4.2 The data for the updated CIA was based upon the earlier air quality assessments, as stated in the latest CIA deadline 5: -

*“The methodology for the assessment was as presented in the Norfolk Vanguard Environmental Statement. Traffic associated with Hornsea Project Three has been included in the ‘with project’ scenario, to consider the overall cumulative impacts that may be experienced at receptors should the peak construction periods of both projects occur concurrently. Cumulative traffic flows have been considered on the road links shared by both projects. Impacts have been considered at sensitive receptors identified in the original assessment presented in Environmental Statement Chapter 26 Air Quality.”*  
(our emphasis)

4.3 The nearest receptor in the assessments referred to above, and in the current CIA was R79, which is on the B1149 (Holt Road). The Street, Oulton - including The Old Railway Gatehouse - *has not been assessed*. It would be assumed that an air quality assessment should have been carried out at The Old Railway Gatehouse as a sensitive receptor, as there would be the cumulative impact of 214 HGVs daily and the property is within only 2 or 3 metres of the highway.

4.4 The criteria used by HOW3 for judging the necessity for assessment of air quality at a specific site was the IAQM guidance (IAQM, 2014). This states that a detailed assessment is required where there are human receptors within 350m of the site boundary and/or within 50m of the route(s) used by construction vehicles on the public highway, up to 500m from the site entrance(s).

The Old Railway Gatehouse qualifies for a “detailed assessment” of air quality when judged by these criteria, but was not so assessed by HOW3.

4.5 The Old Railway Gatehouse has been assessed by HOW3 (**though not by NV**) for *noise and vibration* due to road traffic increases, especially HGVs. As a result of that noise and vibration assessment, a road intervention scheme has been proposed as mitigation to reduce potential noise impacts. However, it should also have been necessary to assess *air quality* at this property, given the close proximity of the house to the road, and the increase in proposed HGVs.

OPC would maintain that it is unacceptable for a developer to consider that, because of the road intervention scheme introduced to mitigate *noise and vibration* effects at the Gatehouse, this should somehow obviate the need for an *air quality assessment* at the same time. *The two issues are entirely separate, and the level of emissions caused by the*

*increase in all traffic will need to be evaluated and mitigated for separately.*

4.6 In conclusion, given that HOW3 did not assess the Gatehouse for air quality, and that the Examination process for Hornsea Three has now closed, *with this matter unresolved*, OPC calls upon Vattenfall to carry out a cumulative air quality assessment for the Old Railway Gatehouse, as a matter of urgency.

5. Oulton Parish Council welcomes assurances, given both at the ISH and at the Working Group meeting later that day, that the Applicant has now decided to adopt, in its entirety, the Traffic Management Plan evolved by Hornsea Project Three for Link 68 - NV's shared access to its Cable Logistics Area and MA7.

This information is documented in Table 1.23 (p. 34) of the Cumulative Impact Assessment: "Oulton – Proposed Highway Mitigation Scheme". The various measures are itemized there (e.g. 8 passing bays, using Grasscrete...) but OPC notes that this table is merely a verbal list.

The Applicant seems to be relying heavily on the assessment work and earlier detailed planning carried out by HOW3 – at least in relation to the mitigation and alterations to the roadway along the southern section of Oulton Street.

OPC remains concerned about the apparent lack of independent production *by Vattenfall* of any detailed technical drawings of the highway intervention scheme, and seeks clarification as to exactly the degree of "cooperation" that is being envisaged over some sort of future "sharing" of detailed construction plans.

This is vital in the event that the NV project proceeds in isolation or before HOW3 as such information would be crucial in providing contractors with sufficient information to tender and complete the works required.

## **Appendix 1.**

### **OPC Orsted Deadline 7 submission**

Paul Killingback

Chair

Oulton Parish Council

**From:** [REDACTED]  
**To:** [Hornsea Project Three](#)  
**Cc:** [Sarah Drljaca](#)  
**Subject:** Registration Number 20010316 - Oulton Parish Council's submission to PINS at Deadline 7  
**Date:** 14 March 2019 11:16:39  
**Attachments:** [Orsted Deadline 7 APPENDIX 1-VISSIM screenshots.docx](#)  
[Orsted Deadline 7 Appendix 2-AIL Table.xlsx](#)

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## Hornsea Project Three

Oulton Parish Council (OPC) welcomes this opportunity to comment on the current status of traffic and environmental issues since Deadline 6, the ASI on March 5<sup>th</sup> and the Issue Specific Hearing on March 8<sup>th</sup>.

### 1. VISSIM

Since Deadline 6, the Parish Council has had sight of the VISSIM traffic modelling scenarios in video format and the council would like to thank the Applicant for making this possible. These are the “large video files” referred to by the Applicant at 3.21 in Appendix 8 (Main Construction Compound Access Strategy VISSIM Modelling Update) containing the models that sit behind the data that have been received by the ExA and by NCC Highways.

At 4.6 in Appendix 8, the conclusion is reached that:

*“VISSIM model for future scenario shows that the entire study network including The Street/B1149 junction would operate satisfactorily with delays of only 38 seconds to the journey from The Street to the B1149.”*

Please note: a range of screenshots from the VISSIM, with explanatory captions, has been attached in Appendix 1, at the end of this submission.

OPC would like to make the following observations on the scenarios we have studied:

1.1 We are obliged to observe that there are significant inaccuracies in the baseline data used to construct the model of the southern section of The Street, Oulton, such that it renders almost all the data produced as a result of the simulation unreliable at best, and invalid at worst.

1.1.1 The width of the roadway all along its length, from the junction with the B1149 to the site entrance at Saltcarr Farms, appears to have been modelled as if 2 cars, and even a car and an HGV, can pass each other without slowing down. This is quite simply not the case. If it were the case, then there would be very little need for passing bays at all.

Although the width of The Street does vary a little here and there, there is no point along its entire length where a white line has been placed down the middle of the carriageway. This indicates in itself that NCC Highways is of the opinion that the roadway is not wide enough for 2 cars to pass safely without slowing down. This is especially true of the very narrow section immediately to the north of the Old Railway Gatehouse.

### 1.1.2 Many inaccuracies flow from this baseline modelling error:

- Many of the cars are shown passing each other at speed, thus invalidating the “average delay” data generated by the model;
- Scenarios frequently occur where a car and an HGV pass each other with ease, away from a passing bay. Since this is impossible, “average delay” data is further invalidated;
- Further scenarios occur where 2 HGVs pass each other away from passing bays. Since this is impossible, this also and very significantly – would impact on the “average delay” data generated.

1.1.2 Vehicle response to the priority signage at the “hump” beside the Railway Gatehouse appears very frequently to malfunction in the VISSIM, such that cars are shown passing each other on the hump, a car and an HGV are shown passing each other on the hump, and even sometimes 2 HGVs are shown passing each other on the hump. These scenarios are neither possible in real life (given the width of the road) nor are they considered to be desirable by the applicant.

1.1.3 The Parish Council is mystified as to how these major inaccuracies can have been allowed to persist within the modelling, but we must stress that the “average delay” data will be significantly distorted because of them. We are obliged therefore to challenge the validity of the Applicant’s statement, quoted above, that:

*“VISSIM model for future scenario shows that the entire study network including The Street/B1149 junction would operate satisfactorily with delays of only 38 seconds...”*

This has not been proven.

1.2 Even with these baseline inaccuracies, which obviously help to ‘improve’ vastly the apparent flow of all types of traffic along The Street, the VISSIM still generates some pinch points and dysfunction e.g. where too many vehicles are shown following behind each other to be adequately contained in a passing bay when meeting oncoming traffic. Please see Appendix 1 below for a sample screenshot.

1.3 Notwithstanding the above, there is one scenario demonstrated by the VISSIM that does yield some useful information, as it does not involve 2-way competing traffic. A screenshot of this scenario is in Appendix 1 attached below.

1.3.1 The scenario in question is of an Abnormal Indivisible Load (AIL) – in this case a cable drum – leaving the compound, travelling south down The Street and entering the B1149. In this scenario *all* traffic was stopped from travelling north along The Street whilst the abnormal load travelled south. Meanwhile, all traffic on the B1149 was *stopped in both directions*. The abnormal load exited onto the B1149 with the queue of traffic that had built up behind it. When all traffic from The Street had exited, the held traffic on B1149 was released. The observed delay for traffic on B1149 was 5 mins 42 seconds. More alarming even than this, however,

is that during that time, depending on the time of day, the tailback of traffic on the B1149 was between 37 and 67 vehicles, *in each direction*, always including several HGVs.

Clearly, it could never be safe to allow that sort of tailback to build up, so close to the unsighted humpback bridge on the B1149.

**[OPC recommend that NCC Highways view the video format of this AIL scenario in the VISSIM at their earliest opportunity.]**

1.3.2 Please note: this southbound AIL scenario is not, to our knowledge, referred to at all in the Appendix 8 document. At 4.7 in App. 8, reference is made only to an AIL travelling “in a northbound direction” - when of course the traffic is only held back further up The Street, but is NOT held back on the B1149, thus producing a much less dangerous scenario. We should hardly need to point out, however, that what goes into the compound must also come out.

It would seem that, in Appendix 8, the southbound AIL scenario has been “scoped out” – much as the noise of the AILs has been “scoped out” of the Noise and Vibration Assessment that will be discussed later.

1.3.3 OPC has to assume that the Applicant is aware that the southbound peak time AIL scenario presents so many dangers to other road users that it would never be permitted, but the council would have appreciated that fact being drawn to our attention, so that we could have had a frank discussion, while NCC were also present, about the likelihood of Abnormal Loads being regularly delivered during the evening and at night. Given the sheer numbers of loads involved, it would probably not be possible to fit them all in to ‘quieter’ periods of the day.

1.4 OPC seeks, at this late stage, absolute clarification on the exact time-periods being referred to in the various scenarios of “off-peak”, “outside normal working hours”, “evening” and “night-time” in relation to the movement of Abnormal Indivisible Loads.

1.4.1 We should also not be confused by the word “abnormal” into thinking that these AIL movements will be exceptional or occasional. On the contrary, given the scale of the project (1,121 cable drums = 1,121 AILs) it will be the ***norm*** that several of them will have to be moved, either separately or in convoys, most weeks, day and/or night, throughout the whole two and a half years.

1.5 The Parish Council would like to draw the ExA’s attention at this point to the Table in Appendix 2, attached to this submission. This table has been created by OPC in an attempt to represent, as an indicative illustration, the real density and regularity of these Abnormal Load movements, constrained as they will have to be into the 30-month “active construction period”.

The pattern of AIL movements portrayed is based on information provided by the Applicant. 36 cable drums will be delivered to the port every 3 – 5 weeks; the Table illustrates the median scenario of a delivery every 4 weeks. [See Appendix 2]

1.6 In view of all of the above, the Parish Council is now significantly concerned that NCC Highways will be forced, because of the traffic dysfunction that would

otherwise be created, to conclude that this density of AIL movements over such a long period, will have to be permitted only in the evenings and at night. Such a conclusion would have disastrous consequences for the restful sleep of the residents of the Railway Gatehouse, and of hamlets and villages all over North Norfolk as these Abnormal Loads criss-cross the county from port to compound to cable corridor work front.

If the Applicant responds with: “but not all cable drums will go to the Main Construction Compound...”, then this will still afford little comfort to the residents disturbed all along the direct route from the port to a particular section of cable corridor. In any case, the Applicant has offered, and we have to consider here, in common with all planning processes, the worst-case scenario.

#### 1.7 Conclusion of this section:

To our great consternation, the Parish Council is finding that the more we learn about the real nature of the types, volumes and movement patterns of the construction traffic for Hornsea Project Three, the more alarmed we are becoming.

How these narrow lanes and small communities can be expected to absorb the sustained impact of the intensity of it – spread throughout a long working day, and probably several nights, for 6 days of every week, and for two and a half years - is barely comprehensible.

## 2. Noise and Vibration Assessment at The Old Railway Gatehouse

2.1 At the ISH on 8<sup>th</sup> March, OPC sought clarification on the issue of the rationale behind the averaging of daily construction traffic noise over an 18-hour period, even though the additional traffic created by Hornsea Three is proposed to be confined to a shorter working day of 11 hours (excluding mobilisation). The council may have to accept that this is some sort of “standard measure” but is keenly aware that averaging anything over a longer period always conveniently brings the average down.

2.2 The further point made by OPC at the Hearing was that human receptors never actually experience “average” noise but only individual or grouped noise “events”, interspersed with silence or lower background noise.

2.3 Both these points were addressed by the Planning Inspector in 2014, when dismissing the Appeal for an AD that proposed to use this same stretch of road as its access route, and to the same site as the compound.

[Ref:APP/K2610/A/14/2212257]

At point 18 in the Appeal Decision, the Inspector challenges the relevance of using “statistical smoothing” in situations such as this, stating that this approach “understates the effects upon the human receptor of separate, sudden bursts of sound which conventional practice recognises to be potentially disturbing.” She goes on to refer to the recently-issued national Planning Practice Guidance on noise, stating that “it does not rely upon numerical measures but on qualitative descriptors”. She continues (point 20) that at harvest time “the traffic noise

generated by the appeal proposal would be at the very least *noticeable and intrusive* and...at times *noticeable and disruptive* as perceived by any residential occupiers of the dwelling.”

The Inspector concludes (point 21) that the passing of the HGV tractor/trailer combinations would “be likely to result in **material harm** to the living conditions of residential occupiers of the Old Railway Gatehouse, *with reference to noise and disturbance.*”

2.4 The response of this Applicant appears to be that because each passing HGV generated by the Hornsea Three proposal will not (on average) be individually more noisy than existing individual HGVs, the project therefore introduces no (or a very low) increase in traffic noise. This approach completely ignores the fact that the increase in total daily *numbers* of HGV traffic movements will be substantial (+118), as will the increase in car movements (+130). *Each* of these additional daily movements will be experienced by the residents as *a separate and additional daily noise disturbance.*

2.5 Perhaps of even more concern is the fact that, at point 4.25 of Appendix 23 to Deadline 6, the Applicant has chosen to “scope out of this assessment” entirely *the noise generated by Abnormal Indivisible Loads (AIL) at night.* The rationale provided for such an omission is given as the fact that, within the OCTMP, the Applicant will have to agree such movements in advance with NCC and that they will commit to notifying OPC and the residents of the Old Railway Gatehouse “of any known night-time AIL movements to minimize the disturbance.”

***Knowing in advance that one is going to be severely disturbed during the night, is not the same as having a restful night's sleep.*** OPC is again mystified, and struggles to understand how the applicant can allow itself to conflate these two situations.

2.6 In addition - knowing what we now know about AIL movements, as detailed in Section 1 above - it is becoming clear that ***noticeable and intrusive*** AIL movements are almost certainly going to be passing right next to the Railway Gatehouse ***on many nights of every week, of every year, for two and a half years.***

2.7 Mitigation: the Applicant has proposed as mitigation for the residents of the Gatehouse:

- that the grading of the “hump” outside their house (which will avoid the grounding of Hornsea Three low-loaders) should be finished with a special surface that reduces both traffic noise and vibration;
- and that there will be priority signage on either side of the hump, so that only one vehicle at a time will ever pass right next to their house.

At the Hearing on 8<sup>th</sup> March, we were informed, during the discussion about Cawston, by the EHO from BDC, that the special road surface referred to was only effective in reducing noise and vibration when vehicles were travelling at *more* than 30 mph. In this case, there will be a speed limit of 30 mph introduced for the duration of the construction period, which will negate the beneficial effect of the



road surface.

As to the priority signage, this may well create *more* disturbance for the residents, with the constant braking and transmission noises of HGVs stopping and starting.

2.8 At the Hearing on 8<sup>th</sup> March, reference was made by the Applicant to an “offer” of further mitigation measures for the residents. The residents pointed out that such an offer had not yet been made.

2.9 OPC also believes that it would be wise for a structural survey to be carried out on the current condition of the Railway Gatehouse, so that the baseline situation in terms of potential vibration effects can be established.

### 3. Traffic numbers by type and function

At the Hearing on 8<sup>th</sup> March, the Applicant was asked by the ExA to provide at Deadline 7 a detailed breakdown of the vehicle numbers so far provided for the daily movements generated by the compound.

The suggestion of the ExA was that such a breakdown might include the numbers of vehicles carrying, for example:

- aggregate
- sand
- ducting
- cable (AILs)
- other HGVs
- all other vehicles e.g. cars and vans

- and that separate numbers should be clearly provided for IN and OUT movements.

At the end of the Hearing, the Applicant demurred and indicated that it would be unable to provide such figures.

OPC is obliged to comment that it can in no way understand why such a breakdown of figures should be so difficult for the Applicant, for two reasons:

- this developer is not a novice in the field and has constructed cable corridors before;
- the Applicant has consistently provided to OPC over many months now the daily vehicle movement figures for the compound as 118 HGVs and 130 staff vehicles.

If the Applicant is unable to break these numbers down into different vehicles by

type and function then what are we to understand by this?

Have these numbers not been derived from detailed planning by their construction engineers - and, if not, are they therefore meaningless?

Oulton Parish Council would hope that the ExA will persist in encouraging the Applicant to make sense of its own figures, and to share this understanding with stakeholders.

4. Appendices.

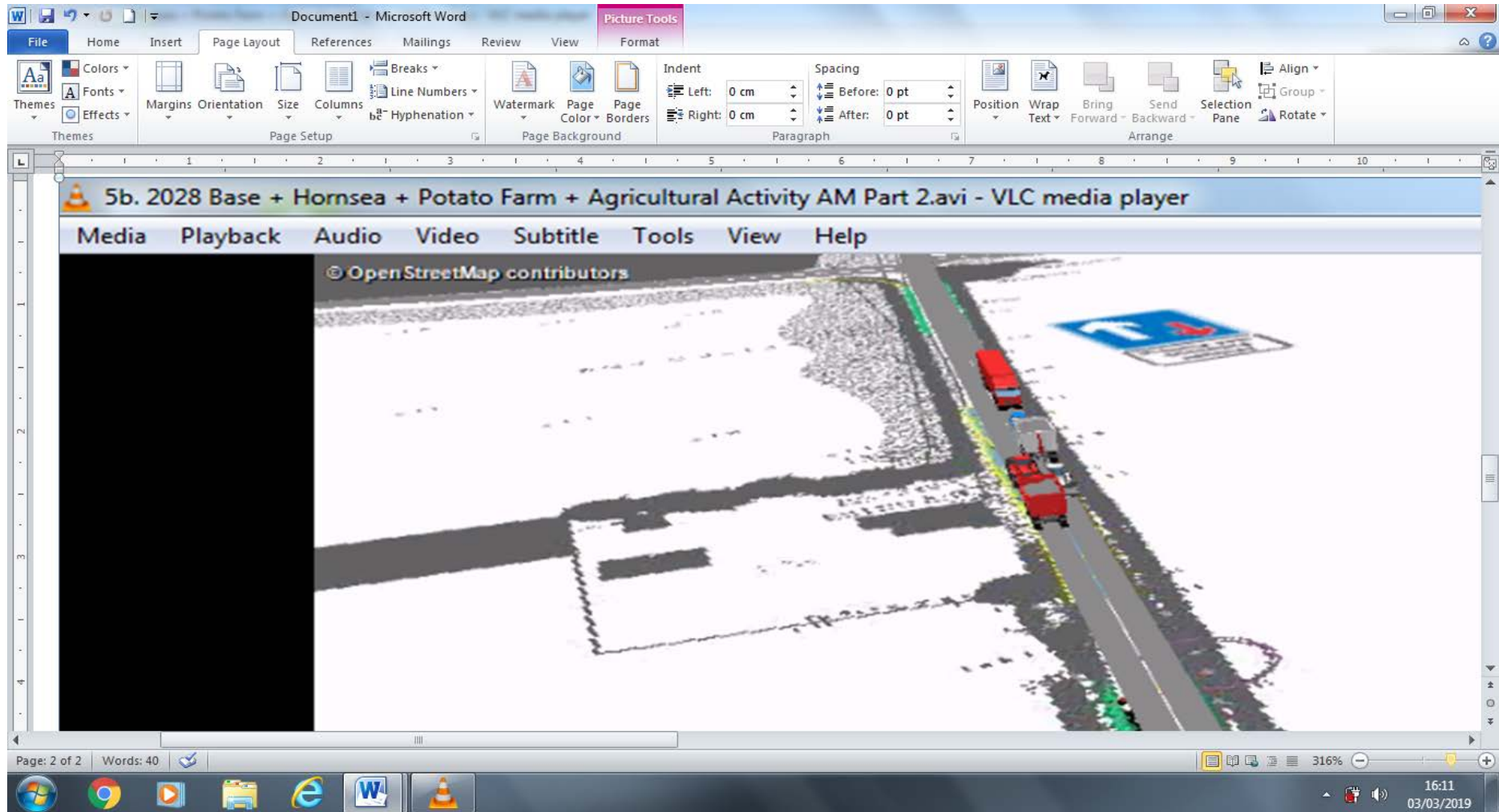
Appendix 1. VISSIM Screenshots/notes.

Appendix 2. Abnormal Indivisible Load (AIL) Data.

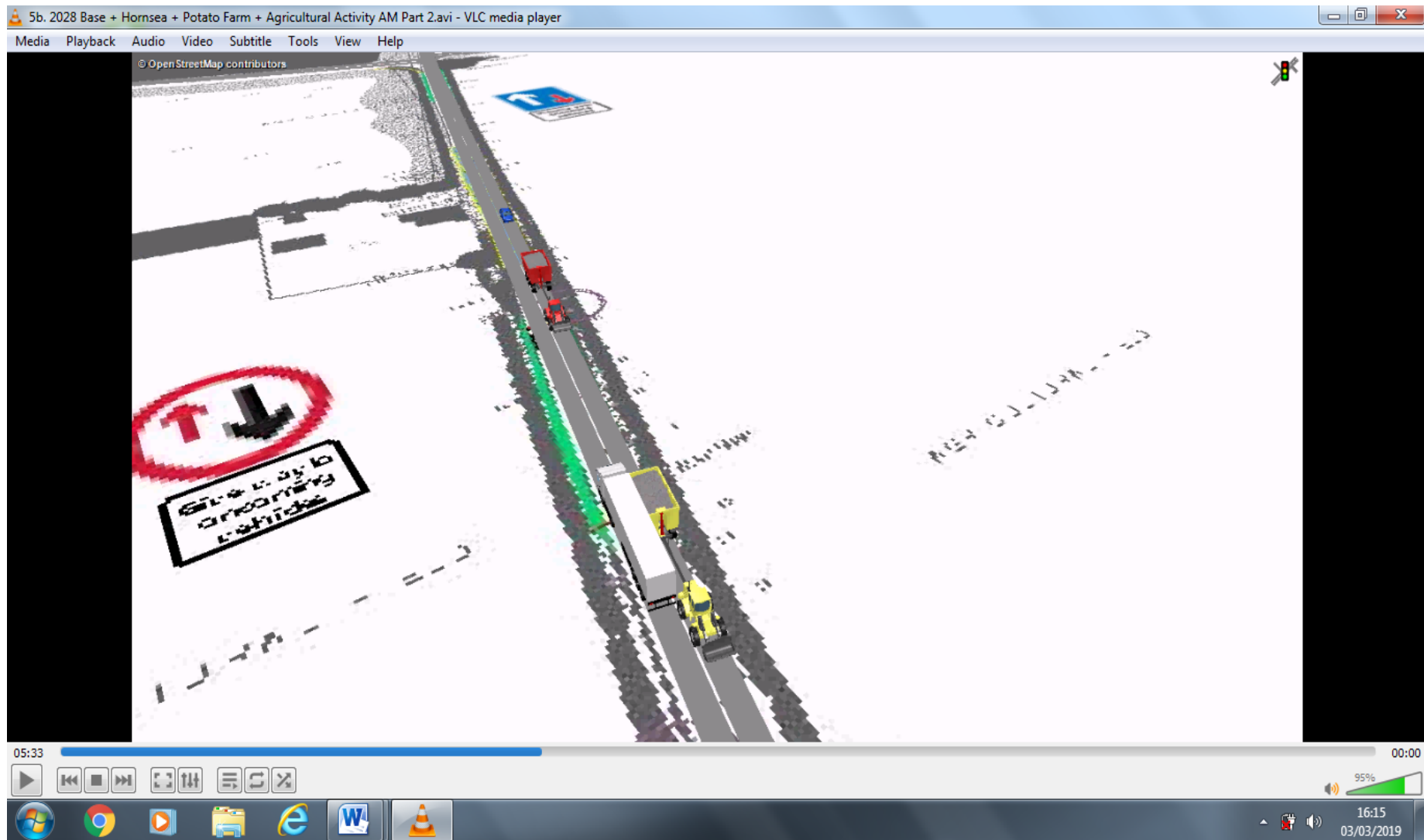
Paul Killingback

Chair

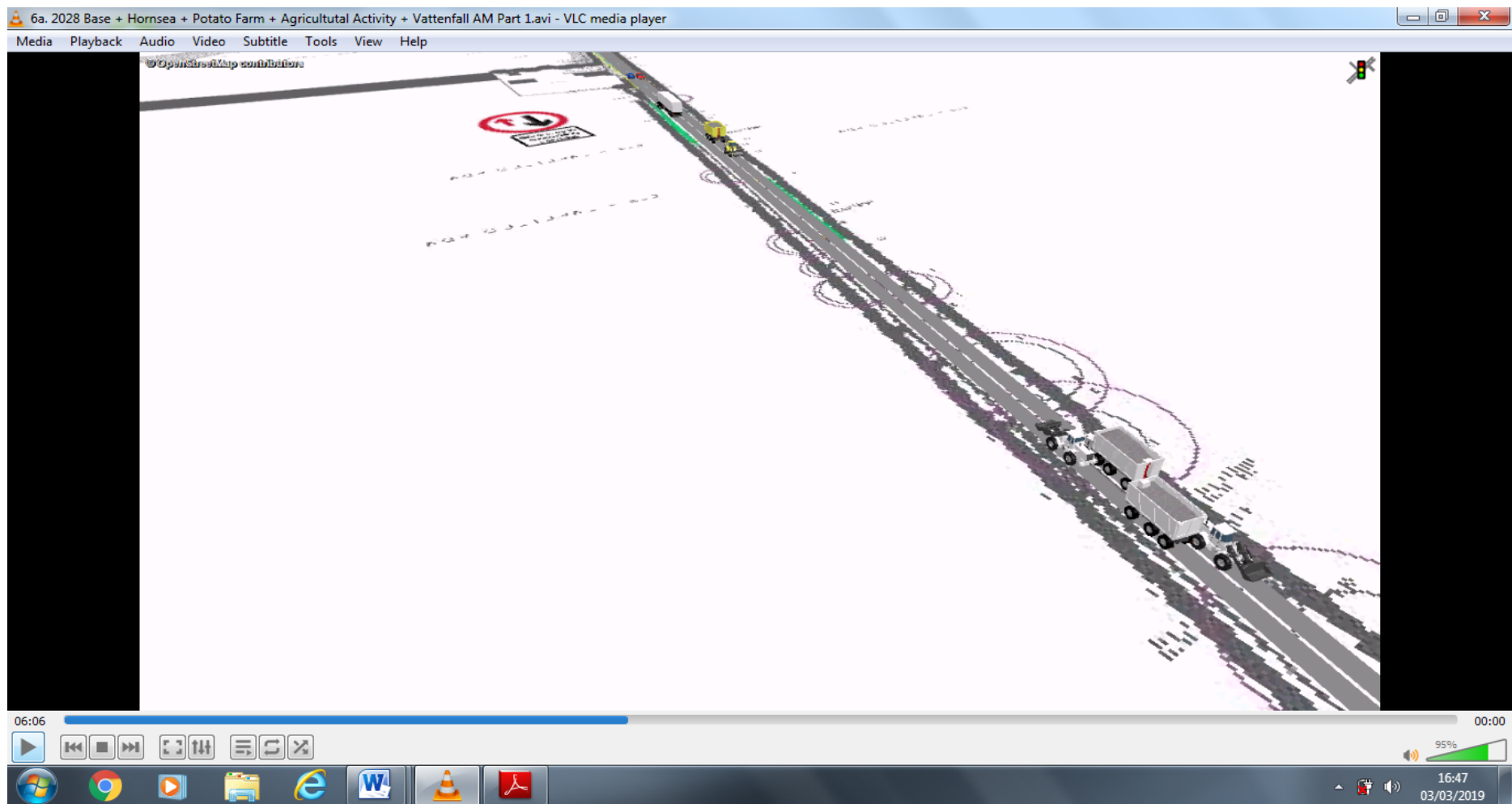
Oulton Parish Council



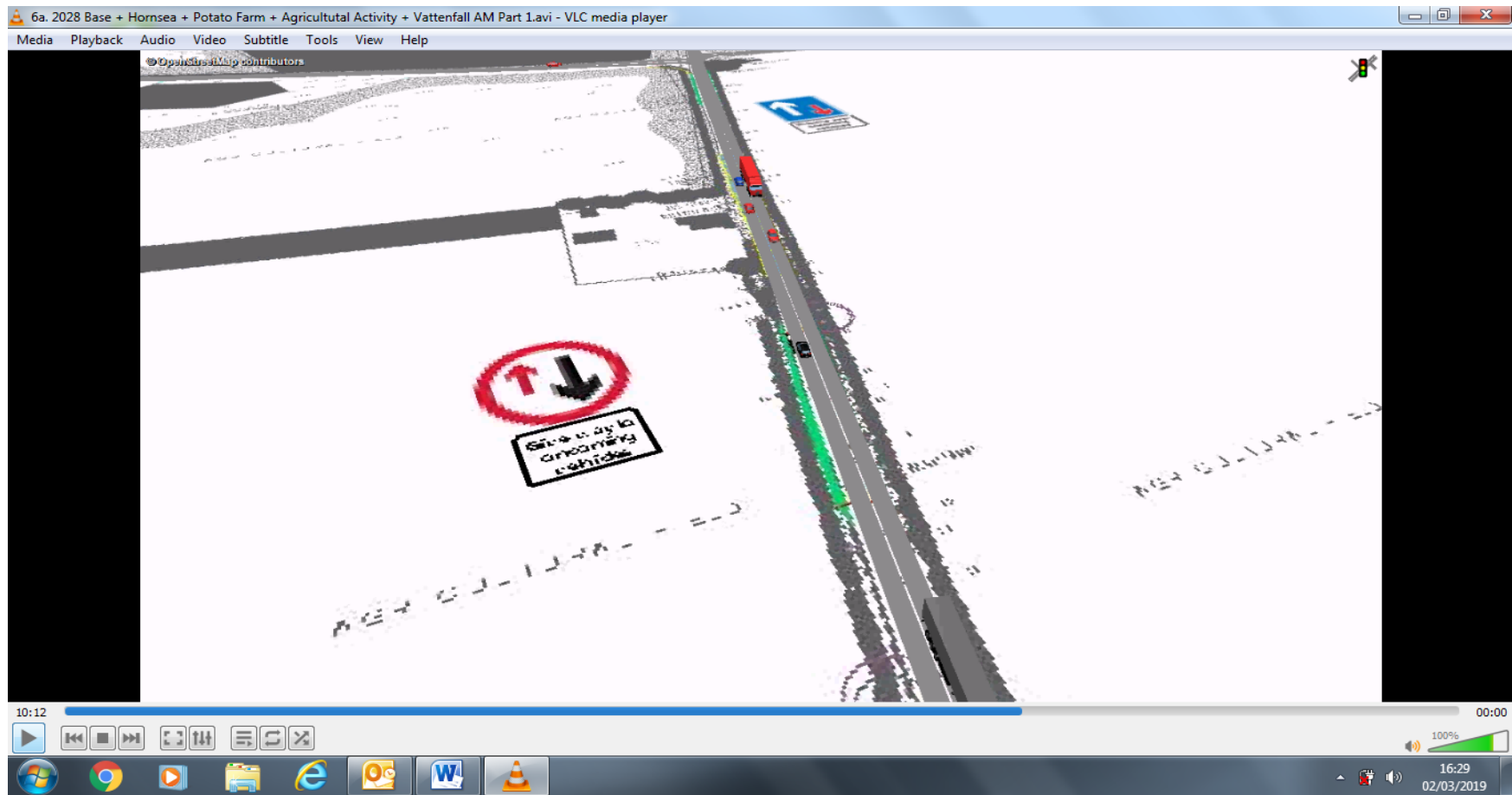
\*Priority signs at the hump next to the Railway Gatehouse not working: it would not be possible for two tractor/trailers or HGVs to pass at this point. The road width at this point is planned to be the same as currently.



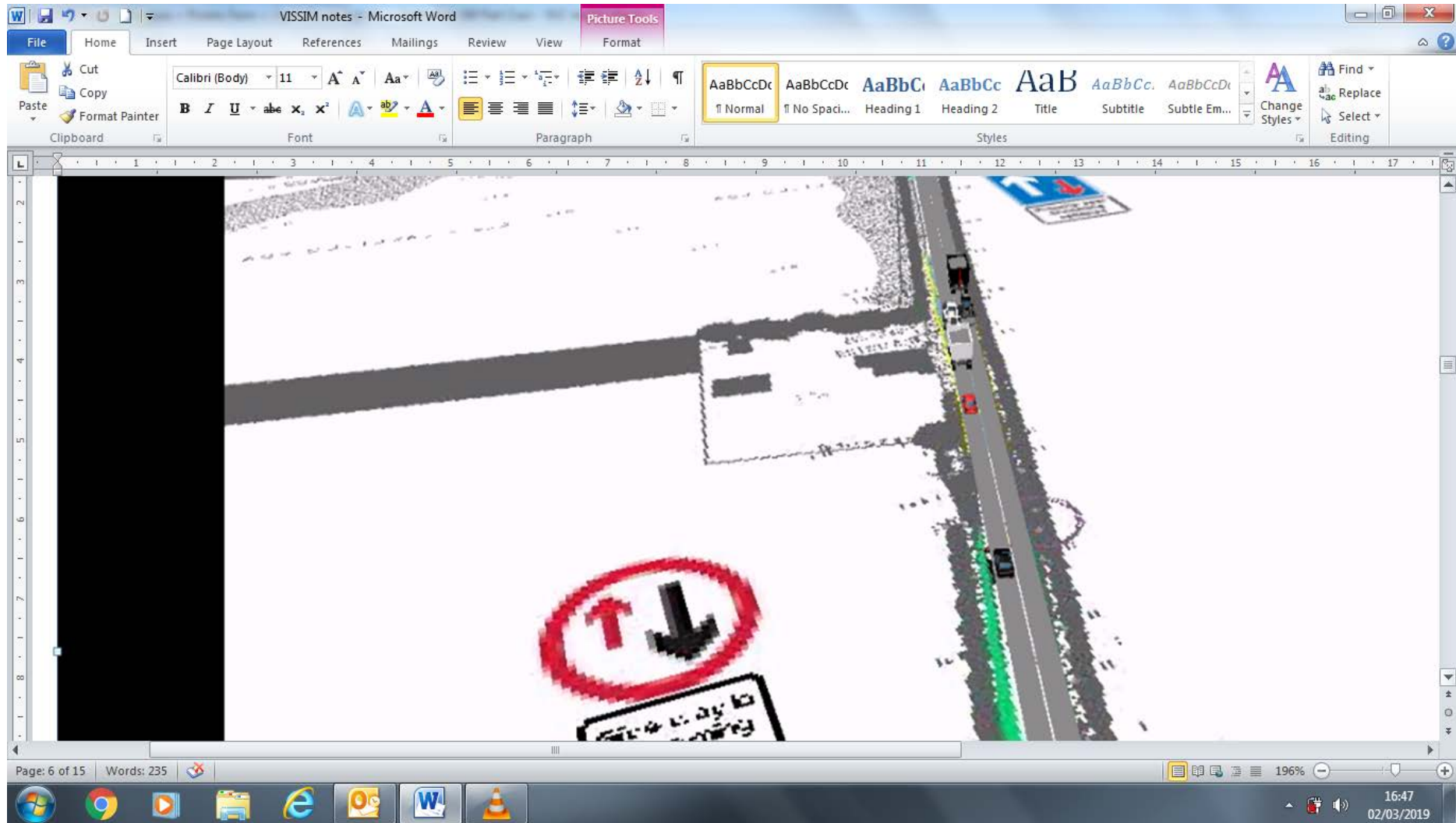
Data input error: one HGV and one tractor/trailer passing each other without use of passing place. This is impossible - the road is too narrow.



Two tractor trailers passing outside of passing places – this is impossible.  
[6a 2028 Base + Hornsea + potato Farm + agricultural activity + Vattenfall AM part 1.]

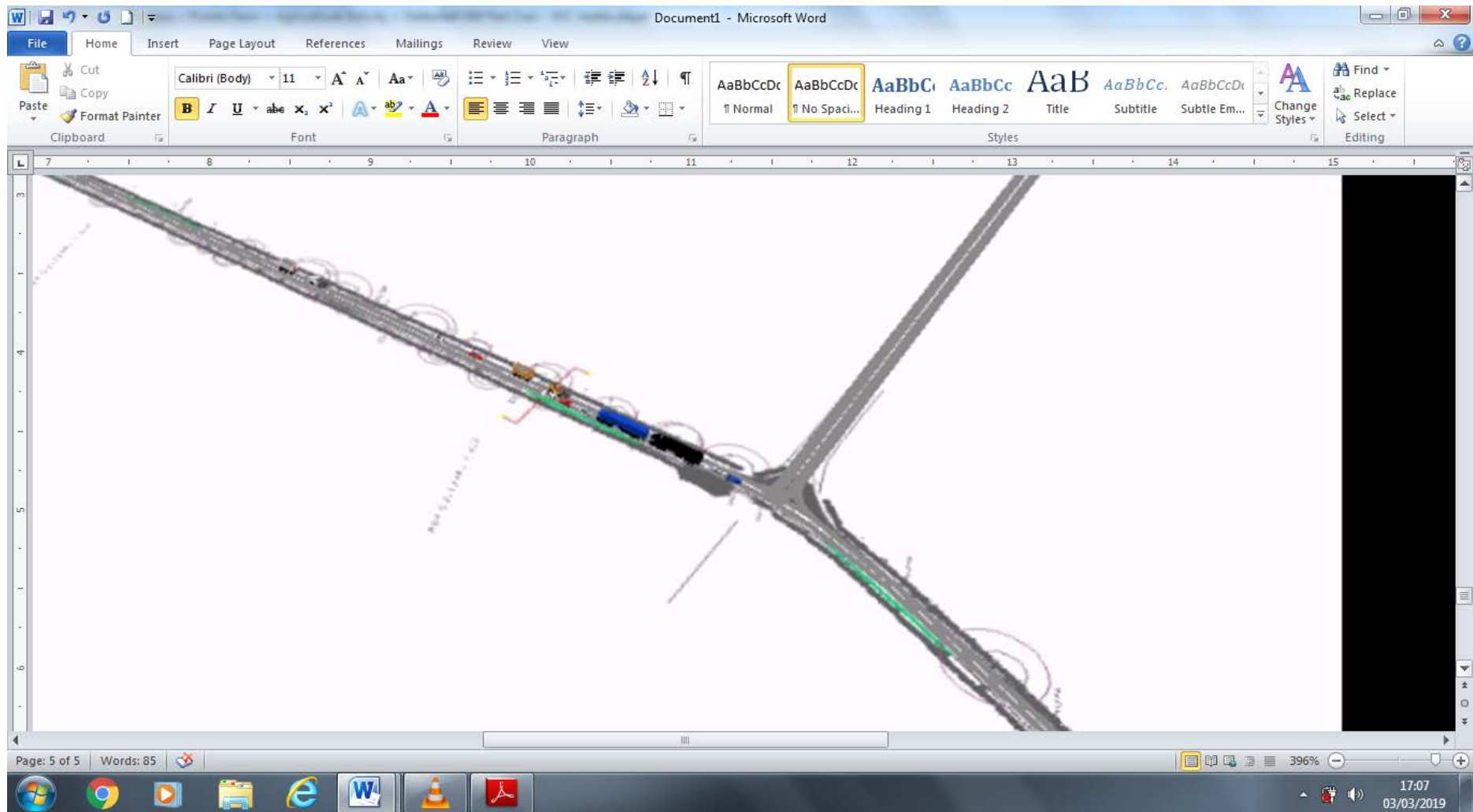


Priority signs not working at the hump: it is impossible for an HGV and a car to pass at that location.



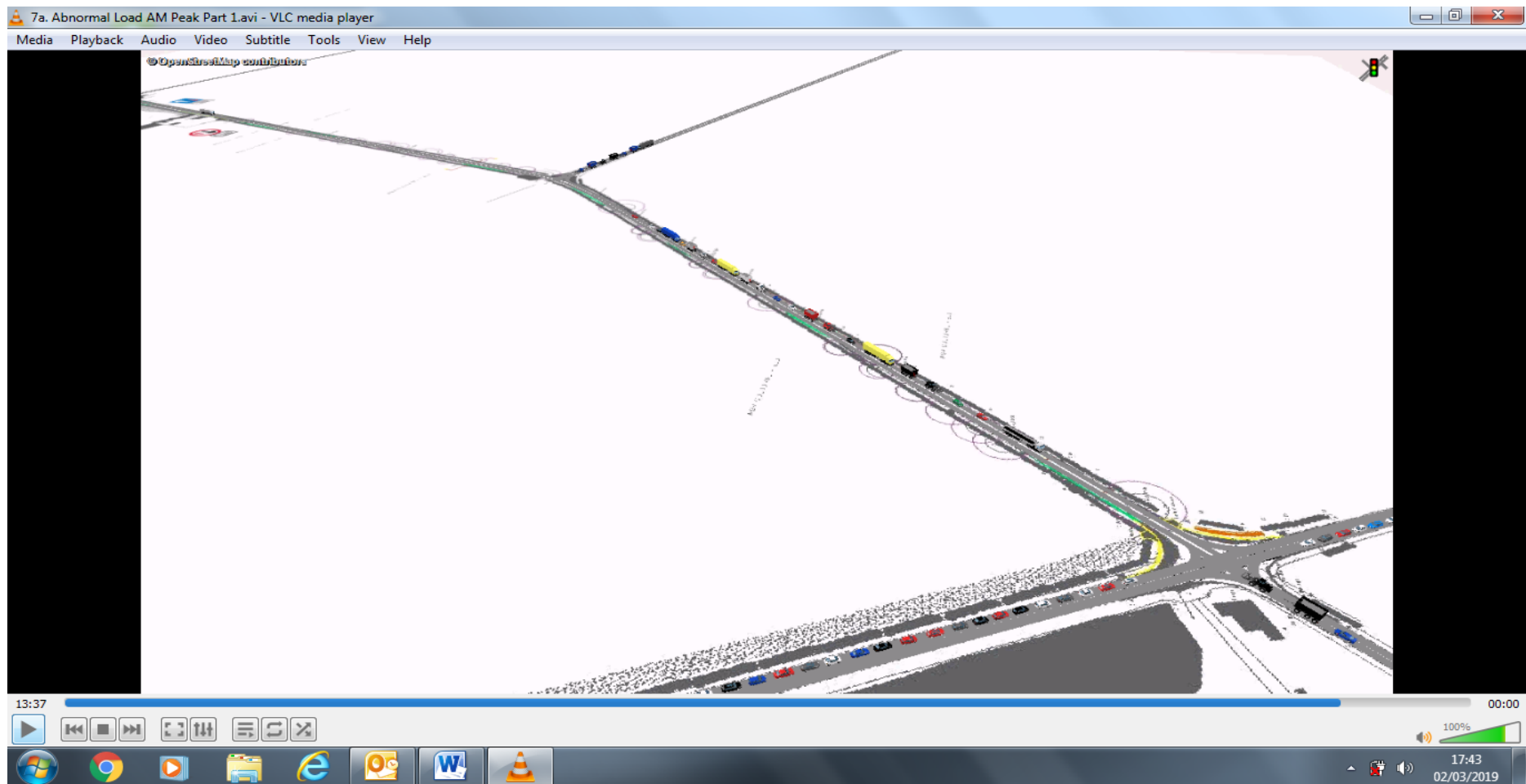
(ABOVE) Two tractors outside old railway gatehouse, potential for vehicles to overrun side of road and, in any case, the road width proposed makes such a passing impossible.





( Above) Enlarged view of bend. [6b 2028 Base + Hornsea + Potato Farm + Agricultural activity + Vattenfall AM part 2]...shows 2 cars 1 HGV in passing place 1 HGV & 2 Cars outside of passing place at bend, waiting for oncoming traffic.(3.33sec)





**(7a AM) Screenshot above:** Abnormal Load (cable drum on low-loader) having left Main Compound travelling SOUTH, as it approaches the B1149 traffic halted on The Street (then allowed to follow AL) and traffic halted on the B1149. Traffic was stopped at 9.50 on video still waiting at end of video(15.00sec).....5.10secs plus part two of video which ran for a further 32seconds before traffic on B1149 was allowed to move off having waited for traffic exiting The Street behind the abnormal load. Total wait time was 5min 42 seconds. Tailbacks on Holt Road: 43 cars/1tractor/trailers in queue from Saxthorpe direction....37 cars /3 HGVs in queue from Cawston roundabout (Humpback Bridge).

**(7d PM)** This showed an abnormal load leaving the Main Compound peak PM, traffic stopped at the Northern end of 'The Street' and on the B1149 in both directions. Similar timescale as for AM for traffic waiting on the B1149 but observed the traffic in the queue was greater.

Observed 63 cars/6 HGV's from Saxthorpe direction & 67 cars/ 8 HGV's from Cawston roundabout direction.

TABLE SHOWS				
1,121 Cable drums are needed for the project.				
36 cable drums arrive at a port and are delivered to the Main Construction Compound.				
The 36 cable drums are delivered TO the Main Construction Compound at a rate of 8-12 a day over 3-5 days				
The cable drums are then delivered to the cable route FROM the main compound over three week before the next shipment arrives				
This is a 4 week scenario to fit 1,121 cable drum delivery into the 30 month active construction period.				
week 1	week 2	week 3	week 4	week 5
36 cable drums IN	12 c/drums OUT	12 c/drums OUT	12 c/drums OUT	36 cable drums IN
week 6	week 7	week 8	week 9	week 10
12 c/drums OUT	12 c/drums OUT	12 c/drums OUT	36 cable drums IN	12 c/drums OUT
week 11	week 12	week 13	week 14	week 15
12 c/drums OUT	12 c/drums OUT	36 cable drums	12 c/drums OUT	12 c/drums OUT
week 16	week 17	week 18	week 19	week 20
12 c/drums OUT	36 cable drums IN	12 c/drums OUT	12 c/drums OUT	12 c/drums OUT
week 21	week 22	week 23	week 24	week 25
36 cable drums IN	12 c/drums OUT	12 c/drums OUT	12 c/drums OUT	36 cable drums
week 26	week 27	week 28	week 29	week 30
12 c/drums OUT	12 c/drums OUT	12 c/drums OUT	36 cable drums IN	12 c/drums OUT
week 31	week 32	week 33	week 34	week 35
12 c/drums OUT	12 c/drums OUT	36 cable drums IN	12 c/drums OUT	12 c/drums OUT
week 36	week 37	week 38	week 39	week 40
12 c/drums OUT	36 cable drums IN	12 c/drums OUT	12 c/drums OUT	12 c/drums OUT
week 41	week 42	week 43	week 44	week 45
36 cable drums IN	12 c/drums OUT	12 c/drums OUT	12 c/drums OUT	36 cable drums IN
week 46	week 47	week 48	week 49	week 50
12 c/drums OUT	12 c/drums OUT	12 c/drums OUT	36 cable drums	12 c/drums OUT
week 51	week 52 (1yr)	week 53	week 54	week 55
12 c/drums OUT	12 c/drums OUT	36 cable drums IN	12 c/drums OUT	12 c/drums OUT
week 56	week 57	week 58	week 59	week 60
12 c/drums OUT	36 cable drums IN	12 c/drums OUT	12 c/drums OUT	12 c/drums OUT
week 61	week 62	week 63	week 64	week 65
36 cable drum IN	12 c/drums OUT	12 c/drums OUT	12 c/drums OUT	36 cable drums IN
week 66	week 67	week 68	week 69	week 70
12 c/drums OUT	12 c/drums OUT	12 c/drums OUT	36 cable drums IN	12 c/drums OUT
week 71	week 72	week 73	week 74	week 75
12 c/drums OUT	12 c/drums OUT	36 cable drums IN	12 c/drums OUT	12 c/drums OUT
week 76	week 77	week 78	week 79	week 80
12 c/drums OUT	36 cable drums IN	12 c/drums OUT	12 c/drums OUT	12 c/drums OUT
week 81	week 82	week 83	week 84	week 85
36 cable drums IN	12 c/drums OUT	12 c/drums OUT	12 c/drums OUT	36 cable drums
week 86	week 87	week 88	week 89	week 90
12 c/drums OUT	12 c/drums OUT	12 c/drums OUT	36 cable drums IN	12 c/drums OUT
week 91	week 92	week 93	week 94	week 95
12 c/drums OUT	12 c/drums OUT	36 cable drums	12 c/drums OUT	12 c/drums OUT
week 96	week 97	week 98	week 99	week100
12 c/drums OUT	36 cable drums IN	12 c/drums OUT	12 c/drums OUT	12 c/drums OUT
week 101	week 102	week 103	week 104/2nd Yr	week 105
36 cable drums IN	12 c/drums OUT	12 c/drums OUT	12 c/drums OUT	36 cable drums IN
week 106	week 107	week 108	week 109	week 110
12 c/drums OUT	12 c/drums OUT	12 c/drums OUT	36 cable drums IN	12 c/drums OUT
week 111	week 112	week113	week 114	week 115
12 c/drums OUT	12 c/drums OUT	36 cable drums IN	12 c/drums OUT	12 c/drums OUT
week 116	week 117	week 118	week119	week120
12 c/drums OUT	36 cable drums IN	12 c/drums OUT	12 c/drums OUT	12 c/drums OUT
week 121	week 122	week 123	week 124	week 125
36 cable drums IN	12 c/drums OUT	12 c/drums OUT	12 c/drums OUT	36 cable drums IN
week 126	week 127	week 128	week 129	week 130/6mth
12 c/drums OUT	12 c/drums OUT	12 c/drums OUT	//////////	30 MONTHS

**From:** [REDACTED]  
**To:** [NorfolkVanguard@pins.gsi.gov.uk](mailto:NorfolkVanguard@pins.gsi.gov.uk)  
**Cc:** [REDACTED] [Parish Clerk:](#)  
[courtney.clemence@vattenfall.com](mailto:courtney.clemence@vattenfall.com); [catrin.jones@vattenfall.com](mailto:catrin.jones@vattenfall.com)  
**Subject:** VATTENFALL NORFOLK VANGUARD - Registration identification number: 20012656 Oulton Parish Council  
**Date:** 02 May 2019 09:42:00  
**Attachments:** [OPC Vattenfall Deadline 7 submission.docx](#)

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**Oulton Parish Council's submission at Deadline 7**

Please find attached Word document.

Paul Killingback  
Chair  
Oulton Parish Council

## Norfolk Vanguard

### Oulton Parish Council's submission at Deadline 7

Oulton Parish Council (OPC) welcomes the opportunity to respond at Deadline 7.

The Parish Council's response consists of queries arising from updated written information received from the Applicant since Deadline 6, and issues raised at ISH 6 Environmental Matters on 24<sup>th</sup> April.

#### 1. Cable Logistics Area: cable drum numbers

**Applicant:** *The Cable Logistics Area would have the capacity to store approximately 20 cable drums. The Applicant confirmed with Oulton Parish Council on 27 March 2019 that the construction methodology requires cable drums to be delivered directly to the cable joints. A number of cable drums may be stored at the cable logistics area to act as a buffer. However, the intention is for the majority of cable drums to be delivered directly to the joint locations. The total number of cable drums required for the entire onshore cable route is approximately 360 which is set out in Appendix 24.4 of ES Chapter 24 Traffic and Transport.'*

**OPC:** The Cable Logistics Area has the ability to store up to 20 cable drums if needed. OPC still maintains that this has the potential to generate additional HGV movements as the need to store is an unknown quantity. The HGV numbers for the cable pulling phase for Link 68 can only relate to this work section, whereas stored cable drums are not necessarily for this section of the cable route, but may be needed elsewhere. If the need to store cables was only required occasionally, it is hard to understand the need for the acquisition of a specific area unless it was to be utilised regularly as a secure cable storage area for the whole project. OPC anticipates, therefore, that cable drums will go into the cable logistics area and out again to various parts of the cable route.

We have learned from our discussions with Orsted that *their* cable drums will arrive in 'batches' of 36 at the port, and be delivered as a batch to their Main Construction Compound in Oulton, for onward delivery to the cable route when needed. OPC seeks clarification as to whether Vattenfall anticipates *its* cable drums arriving at port in batches of, say, 20 - which may well need to be brought straight to Oulton, if sufficient work sections along the cable route are not yet ready?

OPC also assumes that the Cable Logistic Area will remain in situ for 'Boreas', which we believe will take up to 2 years for the cable pulling phase, as pre-ducting for that project would have been carried out during NV's construction.

OPC seeks clarification as to whether the 360 cable drums required for the Norfolk Vanguard project would be repeated for the Boreas project, equating to a total of 720 cable drums to complete both phases?

#### 2. Consented Hours

**Applicant:** *The consented working hours are 7am to 7pm Monday to Friday (a single 12 hour shift), and 7am to 1pm on Saturdays, which is secured through Requirement 26. Outside of these hours, compounds (mobilisation areas) will effectively be locked and will not accept HGVs. To prevent HGVs arriving at a locked compound (outside of the consented*

hours) control of HGV deliveries is set out at Section 1.6.3 of the Outline Traffic Management Plan.

Requirement 26 then goes on to state...

**Applicant:** Requirement 26 does allow for some works to take place beyond the consented construction hours for essential continuous activities, such as concrete pouring or cable pulling. For example, once drilling has begun it may not be appropriate to stop the drilling process until the installation is complete due to drill head pressures and other technical requirements. Any works that are identified as potentially requiring out of hours working will require prior agreement with the relevant planning authority, which is secured through Requirement 26(3). Any application for out of hours working would need to set out potential traffic requirements and expected noise levels at the nearest residential properties and appropriate mitigation as required.

**OPC:** So it appears that, although the imperative to operate only within the consented hours is secured through Requirement 26, yet Requirement 26 *simultaneously allows for work to be carried on outside of those hours*. The Applicant highlights at least three significant construction operations where working outside of consented hours may be needed: pouring concrete, horizontal drilling and cable pulling. OPC seeks clarification regarding Requirement 26, as to exactly what working hours will apply for MA7. We are surprised and alarmed to see "cable pulling" included in the list of activities requiring continuous working - especially as cable pulling forms a very significant part of the latter half of NV's construction phase - and almost the entirety of its sister project, Boreas. On behalf of our residents, we seek clarification therefore as to whether night-time (continuous) working is actually going to be a **major feature** of Vattenfall's construction methodology.

It should also be noted that (as demonstrated at ISH 6) NCC Highways is still strongly requesting trenchless crossing for the B1149: would this involve working outside of consented hours, and additional HGV traffic?

If this is the case, then Oulton will experience night-time noise nuisance from both Orsted HOW3 operating night-time AIL deliveries to their Main Construction Compound and the potential for long periods of out-of-hours work on the cable route from Norfolk Vanguard's operations. As the consented hours already allow for a very long (12-hour) working day, this would effectively grant permission for Vattenfall to work both night and day.

### **3. Link 68 traffic assessment**

**Applicant:** Baseline traffic using Link 68 was estimated for the assessment submitted for Norfolk Vanguard. Automatic Traffic Count (ATC) data was subsequently collected by Hornsea Project Three along this Link 68. The Applicant has reviewed this dataset and can confirm that the numbers reported from the ATC survey do not significantly differ from the estimates used within the Applicant's assessment.

**OPC** have commented at previous deadlines on our objections to the inadequacies of these baseline traffic figures, and Vattenfall's dangerous reliance on already flawed data 'borrowed' from the Orsted project. Numbers of existing agricultural HGVs have been severely under-estimated by Orsted's ATC, and Vattenfall are compounding the felony by failing to carry out their own independent assessments of baseline traffic, and are instead basing their projections on Orsted's discredited data-set and their own *estimated* traffic data for Link 68.

#### **4. Trenchless crossing of B1149**

**Applicant:** *'Where the onshore cable route crosses any roads using open cut trenching methods, traffic management would be employed. Where appropriate, single lane operation of roads would be utilised during installation with signal controls to allow movements to continue. Whilst the width of the B1149 is less than 7.2m kerb to kerb (required for single lane traffic management) the Applicant will introduce temporary widening at this location to ensure that single lane operation can be implemented during the road crossing.'*

OPC: It is noted that the applicants have acknowledged that the B1149 is not wide enough to have single lane traffic control, but we are surprised to see they are now suggesting widening the road to be able to accommodate single-lane use. This would seem to be counterproductive since to widen the road would require additional land and road closures during its construction. Concerns by NCC about the potential for the road surface to fail because of trenching would be aggravated by the road widening process. We understand from ISH 6 that NCC is still wishing to pursue trenchless crossing. The B1149 will be a main route **for both projects** and, with current proposals for some alternative routes to avoid Cawston and utilise Heydon Road, then the B1149 will need to be operational at all times.

#### **5. Link 75: Blickling Rd**

**Applicant:** *'Link 75 has been identified in the Outline Traffic Management Plan (OTMP) (DCO doc: 8.8) as requiring mobile traffic management (pilot vehicles). The OTMP highlights that "some localised carriage widening may be required", i.e. the introduction of passing places where required to facilitate the proposed approach.'*

OPC: It is noted that the Applicant's approach to Link 75 seems to have developed from 'pilot vehicles' to road widening and passing places. There surely would be a need to know exactly where and how this will be achieved as the narrowest points along Link 75 are where there are:

1. Houses within a few metres of the road (sensitive receptors).
2. Banked road sections.
3. Verges where the road drops into a field culvert.
4. A narrow bridge with weight restrictions, requiring vehicles over 3 tonnes to keep to the centre of the bridge.
5. A listed building (Oulton Lodge), again at a narrow section of road.
6. No pavements or adequate verges.

There is a further listed building on Link 75 (Blickling Hall), owned by the National Trust, which is a magnet for thousands of tourists regionally, all the year round.

OPC challenges the possibility of the applicant being able to implement any meaningful "localised carriage widening" on the scale needed to actually improve matters. The whole length of the road would be involved, which would be unrealistic.

This sort of situation only serves to underline the point made by NCC Highways during ISH 6, namely that when traffic issues are left unresolved until after Examination or post-consent, then Highways are at a disadvantage in future negotiations with the developer.

OPC therefore urges the ExA to resolve these traffic issues in as much detail as possible *within the DCO*.

## **6. Noise & Vibration, and Air Quality assessments**

The basis for the applicant's air quality assessment was likely to be monitoring from local authorities at specific locations usually in urban areas or on major roads.

Norfolk Vanguard and Hornsea Three's cable route and road links will be accessing rural areas. We therefore query whether the baseline data are relevant to locations like The Railway Gatehouse.

As an example, agriculture was responsible nationally for over 80% of ammonia emissions in 2017: has the applicant allowed for the existence *in the immediate vicinity of The Gatehouse* of a large intensive poultry farm and an outdoor and indoor pig rearing enterprise on the airfield? (**See Appendix 1**)

Furthermore, **all** agricultural vehicles run on diesel, with its dangerous emissions of PM 2.5. Has that fact been taken into account in the baseline data and added, along with the projects' cumulative impact of HGVs, in terms of air quality emissions? (**See Appendix 2**)

In this regard OPC are fully aware of a submission made in the closing stages of the Examination process for Orsted, by a research fellow of the London School of Hygiene and Tropical Medicine, who is also a resident living on the B1149. Professor Barnett has become increasingly concerned about the lack of appropriate consideration being given to the public health effects of both these projects, especially in relation to particulate emissions from HGV traffic, which will affect residents throughout the county.

He has raised with Orsted's Examination some very detailed questions relating to these effects, which OPC would like to submit to Vattenfall's Examination for the Panel's consideration at deadline 7.

**Applicant:** *The Applicant has undertaken a cumulative impact assessment of the combined construction traffic from Norfolk Vanguard and Hornsea Project Three along Link 68, which was submitted to the examination at Deadline 5 (ExA; ISH1; 10.D5.3). This includes an assessment of noise, vibration and air quality impacts.*

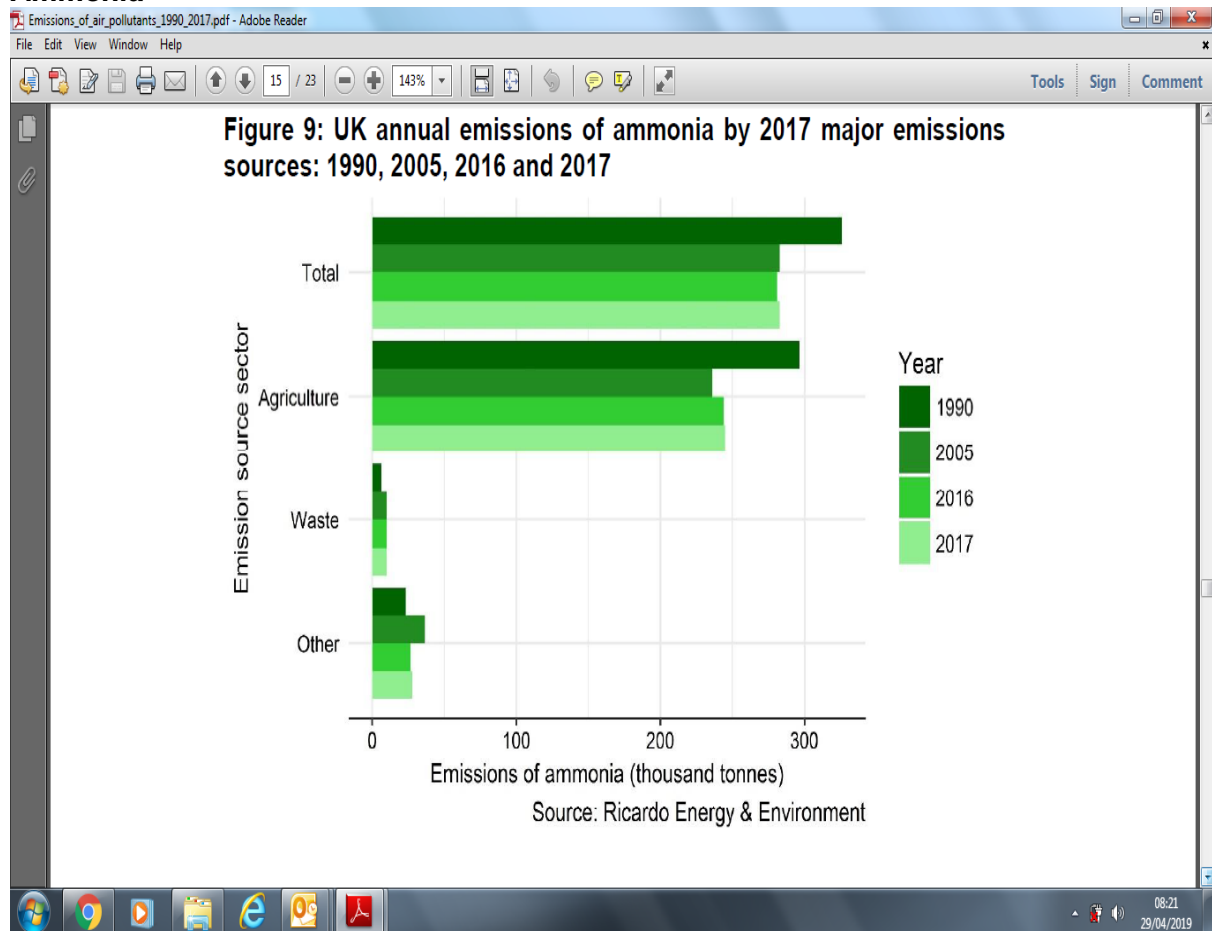
**OPC:** Noise, vibration and air quality assessments carried out for Link 68 and 'The Old Railway Gatehouse' appear to have been only desk-top surveys or data acquired from HOW3's assessments. The residents of The Gatehouse are not aware of any physical monitoring assessments carried out by Vattenfall at or near their property.

The issue of air quality was raised at ISH 6. The baseline data which appears to have been used for air quality is sourced from the local authorities and all of their data is urban-based, according to where monitoring equipment has been placed, usually on city roads or main A roads; there are no monitoring sites on rural roads. (**See Appendix 3**)

## Appendix 1

**'There was an increase of 0.7 per cent in emissions of ammonia between 2016 and 2017. Increases since 2013 go against the trend of steady overall reduction observed from 1998 to 2013. Agriculture accounted for 87 per cent of emissions from ammonia in 2017.'**

### Data from DEFA National Statistics Release: Emissions of Air Pollutants in the UK 1970 - 2017 Ammonia





## Appendix 2.

### Data from DEFA National Statistics Release: Emissions of Air Pollutants in the UK 1970 - 2017

#### PM10

Emissions\_of\_air\_pollutants\_1990\_2017.pdf - Adobe Reader

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19 / 23 100%

Tools Sign Comment

**Table 6: UK annual emissions of PM<sub>10</sub> by emissions source: 1990, 2005, 2016 and 2017**

Sector	Year							
	1990		2005		2016		2017	
	Emissions ('000 tonnes)	% of total emissions	Emissions ('000 tonnes)	% of total emissions	Emissions ('000 tonnes)	% of total emissions	Emissions ('000 tonnes)	% of total emissions
Energy Industries	74.3	20	11.8	6	4.5	3	4.2	2
Manufacturing Industries and Construction	37.4	10	21.3	11	19.3	12	21.0	12
Road transport	34.8	9	30.6	15	20.0	12	19.3	11
Non-road transport	18.0	5	11.6	6	3.9	2	3.9	2
Domestic combustion	44.2	12	29.2	14	46.2	28	44.9	27
Other small stationary combustion & non-road mobile sources and machinery	16.2	4	7.7	4	2.6	2	2.5	1
Other mobile combustion (military aircraft and naval shipping)	1.2	0	0.6	0	0.2	0	0.2	0
Fugitive emissions	6.2	2	3.0	1	2.0	1	1.9	1
Industrial processes and use of solvents	100.2	27	63.9	32	48.1	29	50.2	30
Agriculture	33.3	9	16.7	8	16.8	10	17.1	10
Waste	7.3	2	4.7	2	4.0	2	4.0	2
Other	0.0	0	0.0	0	0.0	0	0.0	0
<b>NATIONAL TOTAL</b>	<b>373.1</b>		<b>201.1</b>		<b>167.7</b>		<b>169.3</b>	
Memo Items*	83.9		72.5		50.8		50.1	

Source: National Atmospheric Emissions Inventory

19

#### PM2.5

Emissions\_of\_air\_pollutants\_1990\_2017.pdf - Adobe Reader

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**Table 7: UK annual emissions of PM<sub>2.5</sub> by emissions source: 1990, 2005, 2016 and 2017**

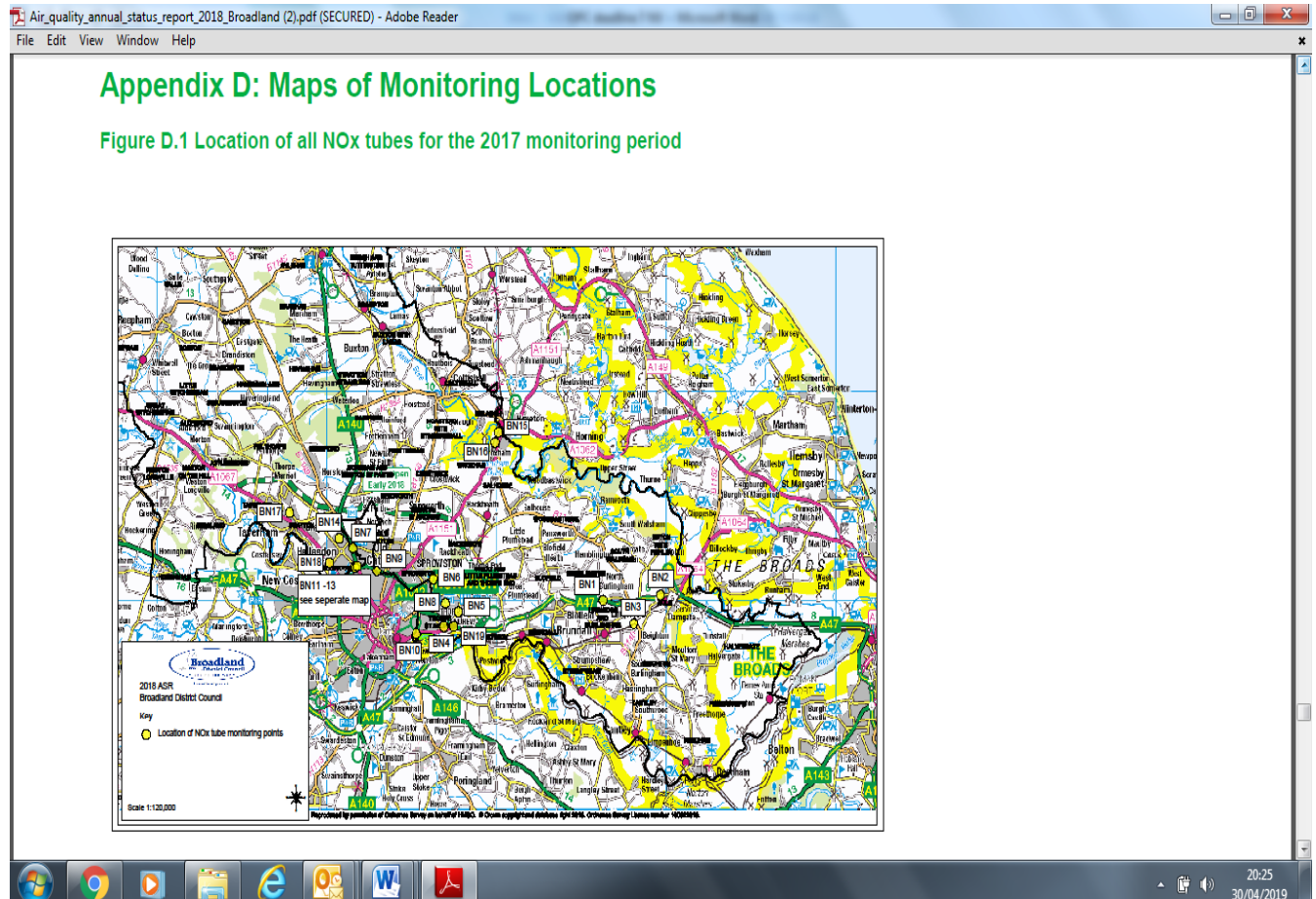
Sector	Year							
	1990		2005		2016		2017	
	Emissions ('000 tonnes)	% of total emissions	Emissions ('000 tonnes)	% of total emissions	Emissions ('000 tonnes)	% of total emissions	Emissions ('000 tonnes)	% of total emissions
Energy Industries	34.4	15	7.4	6	3.6	3	3.3	3
Manufacturing Industries and Construction	34.5	15	20.4	16	18.7	18	20.4	19
Road transport	29.4	13	24.3	20	13.5	13	12.8	12
Non-road transport	17.1	7	11.0	9	3.7	4	3.7	3
Domestic combustion	43.4	19	28.5	23	45.2	43	43.9	41
Other small stationary combustion & non-road mobile sources and machinery	15.5	7	7.5	6	2.5	2	2.5	2
Other mobile combustion (military aircraft and naval shipping)	1.1	0	0.6	0	0.2	0	0.2	0
Fugitive emissions	1.6	1	1.4	1	1.2	1	1.2	1
Industrial processes and use of solvents	30.5	13	15.9	13	10.9	10	11.4	11
Agriculture	18.3	8	2.9	2	2.8	3	2.9	3
Waste	6.8	3	4.3	3	3.6	3	3.6	3
Other	0.0	0	0.0	0	0.0	0	0.0	0
<b>NATIONAL TOTAL</b>	<b>232.7</b>		<b>124.3</b>		<b>106.0</b>		<b>105.9</b>	
Memo Items*	64.8		50.5		28.6		27.6	

Source: National Atmospheric Emissions Inventory

20

### Appendix 3.

The map below (Taken from Air Quality Annual Status Report 2018 – Broadland District Council) shows the monitoring locations grouped around Norwich. No rural monitoring identified.



**From:** [REDACTED]  
**To:** [NorfolkVanguard@pins.gsi.gov.uk](mailto:NorfolkVanguard@pins.gsi.gov.uk)  
**Cc:** [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [courtney.clemence@vattenfall.com](mailto:courtney.clemence@vattenfall.com); [catrin.jones@vattenfall.com](mailto:catrin.jones@vattenfall.com); [John.R.Shaw@norfolk.gov.uk](mailto:John.R.Shaw@norfolk.gov.uk); [martin.dixon@norfolk.gov.uk](mailto:martin.dixon@norfolk.gov.uk); [matthew.rooke@broadland.gov.uk](mailto:matthew.rooke@broadland.gov.uk)  
**Subject:** Oulton Parish Council registration no: 20012656 deadline 8  
**Date:** 29 May 2019 16:27:02  
**Attachments:** [Oulton Parish Council NV deadline 8 response.docx](#)

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Please find attached Oulton Parish Council submission at deadline 8.

Regards,  
Susan Mather  
pp  
Paul Killingback Chair  
Oulton Parish Council

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This email has been scanned by the Symantec Email Security.cloud service.  
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## Oulton Parish Councils response at deadline 8 to applicants deadline 7 submissions

*Noise mitigation Measures at The Old Railway Gatehouse Position Statement Issue Specific Hearing 6 action point 14,*

AND

*Air quality assessment for Old railway Gatehouse Position Statement Issue Specific Hearing 6 action point 15,*

And the recent

*Technical Note Responding to Norfolk County Council's Request for Trenchless Crossings of the A1067 and B1149*

### Noise Mitigation Measures

Oulton Parish Council notes the adoption of the Road Mitigation Scheme by Vattenfall as proposed by Orsted Hornsea Three. This will form continuity if both projects are granted their DCO's. However OPC is still unclear how the proposed mitigation plans will be transferrable if HOW3 does not proceed with its DCO. Vattenfall have not produced their own set of plans as part of their DCO. OPC raises the issue of copyright/liability if designed by a third party for HOW3 but used by Vattenfall.

Further mitigations were proposed by HOW3 for the Old Railway Gatehouse, OPC questions the commitment to honour these proposals by Vattenfall given their response at deadline 7....

*'These measures include installation of double glazing along the façade closest to The Street, or the provision of a wall along the garden of the property. Hornsea Project Three state that these options would be taken forward should residents wish; however they are not essential to mitigate the potential noise effects (Hornsea Project Three, Deadline 6 submission: Appendix 23 – Construction Traffic Noise and Vibration Assessment at The Old Railway Gatehouse).'*

*'The Applicant is in the process of discussing these optional mitigation measures with the owner of The Old Railway Gatehouse and a further update will be given at Deadline 8.'*

### Applicants Noise Assessment – Idling and Accelerating HGVs in Proximity to The Old Railway Gatehouse

OPC observe that the applicant has made the assumption that with the proposed mitigation of road regrading and 30mph speed limit/Priority signage this will reduce noise impacts from HGV's passing The Old Railway Gatehouse. The mitigations will reduce the impact of vibrations and some noise along the regraded hump; however it is unclear how engine noise will be reduced from traffic approaching the Old Railway Gatehouse, as it will still be audible on the approach to, stopping by and on leaving the regraded road section.

In close proximity to The Gatehouse is the entrance to HOW3 compound and Heydon Rd route to MA7/Cable logistics area. Traffic will have to stop to assess whether they can proceed onto The Street and would then have to stop to give way according to what is proceeding along the priority signed stretch of road at the Gatehouse. This would account for at least 4 scenarios for stopping and starting.

The applicant has gone onto assessing the impact of traffic waiting in the lay-by (Passing place) and stated in the *Noise mitigation Measures* document that: **10% of HGV traffic would be required to wait in the lay-by until the carriageway was passable;**

This scenario has been used to re-run the Noise Assessment.

However on reading the Air Quality Assessment which has also been re-run, OPC note that there was another scenario of **25% of HGV traffic waiting** in the Lay-by (Passing place), this second scenario used in the air quality assessment seems to have been overlooked in the Noise Assessment.

*Air Quality assessment: 12. Only a small proportion of passing vehicles would be required to stop at the proposed passing place at The Old Railway Gatehouse. For the purpose of this note, two scenarios have been tested, based on professional judgement:*

- **Low scenario - that during the daytime 10% of the cumulative HGVs along Link 68 would have to stop at the passing place.**
- **High scenario - that during the daytime 25% of the cumulative HGVs along Link 68 would have to stop at the passing place.**

Using the 10% or 25% scenarios of HGV traffic waiting in the Lay-By (Passing place), this equates to 21/53 daily (NV/HOW3 only HGV's) or 1 / 4 an hour (over 12 hour day). This does not take into account agricultural traffic/existing HGV's.

The assessment of HGV's has steered away from the issue of other traffic associated with both projects and an assumption that cars and vans will not be noticeable. There will be 210 HOW3/NV project related vehicles daily (peak) as well as the combined 214 HGV's (peak), excluding existing traffic.

The extract below\* *From page 3 UK Noise Association (2009) Speed and Road Traffic Noise – The role that lower speed could play in cutting noise from traffic.*

***\*The traffic mix is an important factor in both overall noise and noise peaks. Heavy vehicles, mopeds and motorcycles are disproportionately noisy. At 30 km/h (19mph) one heavy vehicle can emit as much noise as 15 cars.***

This would seem to suggest that traffic mix is important to the types of noise experienced, and suggests that 1 HGV could sound like 15 cars. This would mean in sound terms the residents could experience the combined traffic equivalent of 3,420 cars passing daily.

It goes on to state...

***However, light vehicles dominate traffic noise because they account for most of the traffic. Even on roads where there is a greater percentage of heavy traffic, cars will still usually dominate noise levels because of their higher speeds.***

There is no guarantee that cars will uphold the speed restrictions, with a reduced gradient on the old railway hump some traffic will be tempted to go faster. This has always been a concern to OPC that the smoothing of the hump will remove an effective speed hump.

### **Air Quality – The Old Railway Gatehouse**

The applicant has concluded that the Air Quality Assessment will result in a negligible impact. The assessment methodology used, ***as set out in section 26.4.1.2 of Environmental Statement Chapter 26 Air Quality.***

OPC note that their query regarding Intensive farming was investigated and emissions from ammonia were put to one side. However the applicant did acknowledge that ammonia emissions can result in secondary particulate matter and goes on to say

***'Particulate matter has health-based Objectives, and the contribution from secondary particulate matter formation is included within the Defra mapped background data used in the assessment. It is not possible to calculate the proportion of secondary particulate'***

OPC would point out that the intensive turkey farm has a permit from the Environment Agency which monitors the annual discharge of PM10 and is subject to control of those emissions. The screen shot **Table 1** shows the Environment Agency permit information (*environment agency 'what's in your back yard'*) for emissions up to 2012.....

Table 1 PM10 emissions from 2007 - 2012

Particulates (PM10) (Grid reference: X: 614,803.79; Y: 326,942.67)

This table shows the amount of substance released, for each authorisation in the area you chose. Largest releases are shown first.

Page 1 of 1 (6 results for selected location)

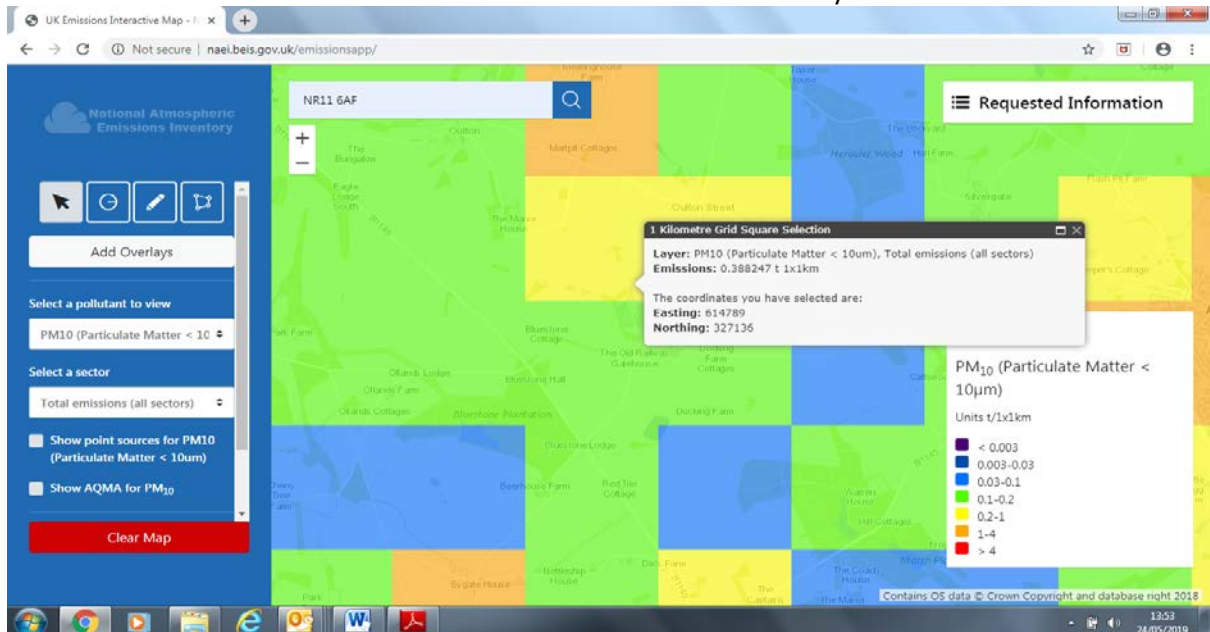
Operator name	Site address	Year	Quantity released (tonnes)
Bernard Matthews Foods Limited	Oulton Poultry Farm The Street The Old Airfield Oulton Norfolk	2012	27.2919
Bernard Matthews Foods Limited	Oulton Poultry Farm The Street The Old Airfield Oulton Norfolk	2011	35.4585
Bernard Matthews Foods Limited	Oulton Poultry Farm The Street The Old Airfield Oulton Norfolk	2010	38.3019
Bernard Matthews Foods Limited	Oulton Poultry Farm The Street The Old Airfield Oulton Norfolk	2009	29.2575
Bernard Matthews Foods Limited	Oulton Poultry Farm The Street The Old Airfield Oulton Norfolk	2008	29.7339
Bernard Matthews Foods Limited	Oulton Poultry Farm The Street The Old Airfield Oulton Norfolk	2007	28.366

Following the Farms change of ownership...latest information applied for from environment agency, freedom of information request. (See Appendix 1) Unfortunately does not give more recent annual emissions for PM10 but does indicate that the farm applied to increase production of up to 132,000 turkeys from 2010

Table 2 map <http://naei.beis.gov.uk/emissionsapp/>

Shows current emissions for the area around the turkey farm it also highlights that PM10 varies across this area. This could mean areas not assessed could be exposed to higher emission dispersion along and beyond access routes.

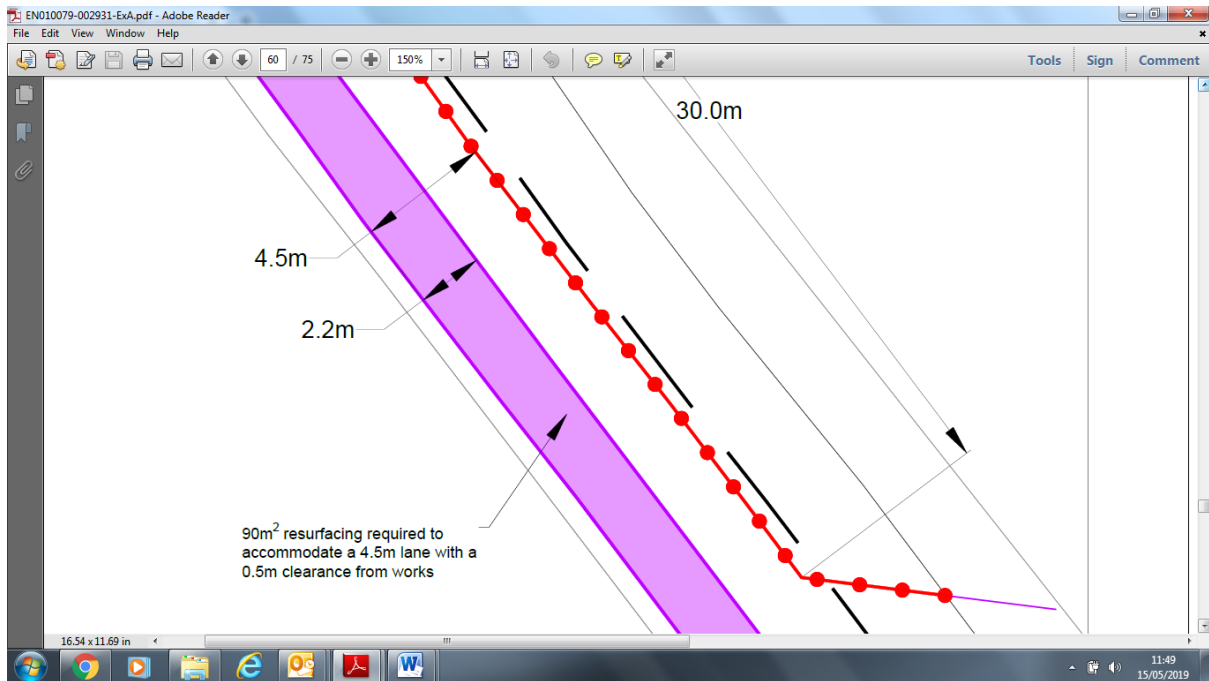
Table 2 shows PM10 emissions for the Turkey farm



OPC questions whether the levels of PM10 emissions from the intensive turkey farm, plus the addition of assessed cumulative traffic and dust from construction materials would be within the objective of annual PM10 40 µg/m3?

## Trenching of B1149

OPC note that the applicants propose to create a single lane width of 4.5m this is to accommodate abnormal loads. To achieve this 2.2m will be needed to widen the road. This appears to give 0.1m margin for error as the cable drums for HOW3 will be 4.4m wide; this also does not take into consideration large and wide agricultural vehicles.



### Extract from: Hornsea Three Appendix 28 to DL7 - Cumulative Link Impact Assessment Relating to Traffic: Oulton and Cawston March 2019

*The temporary impact of the construction work may affect hazardous, dangerous and abnormal indivisible loads as stated in paragraphs 7.11.2.73 and 74 of the ES, it is expected that, for Hornsea Three, some Abnormal Indivisible Loads (AILs) would be associated with cable drum movements to the onshore cable corridor and Oulton Compound. ....**Regarding Link 208, the total number of cable drum movements associated with the construction of Hornsea Three is 1,121, which would affect The Street twice as they would enter the compound from source and then leave again to the relevant cable section. The maximum number of abnormal loads for Link 208 is therefore 2242 total abnormal load movements***

Then goes on to state.....

#### **Sensitivity of the Receptor**

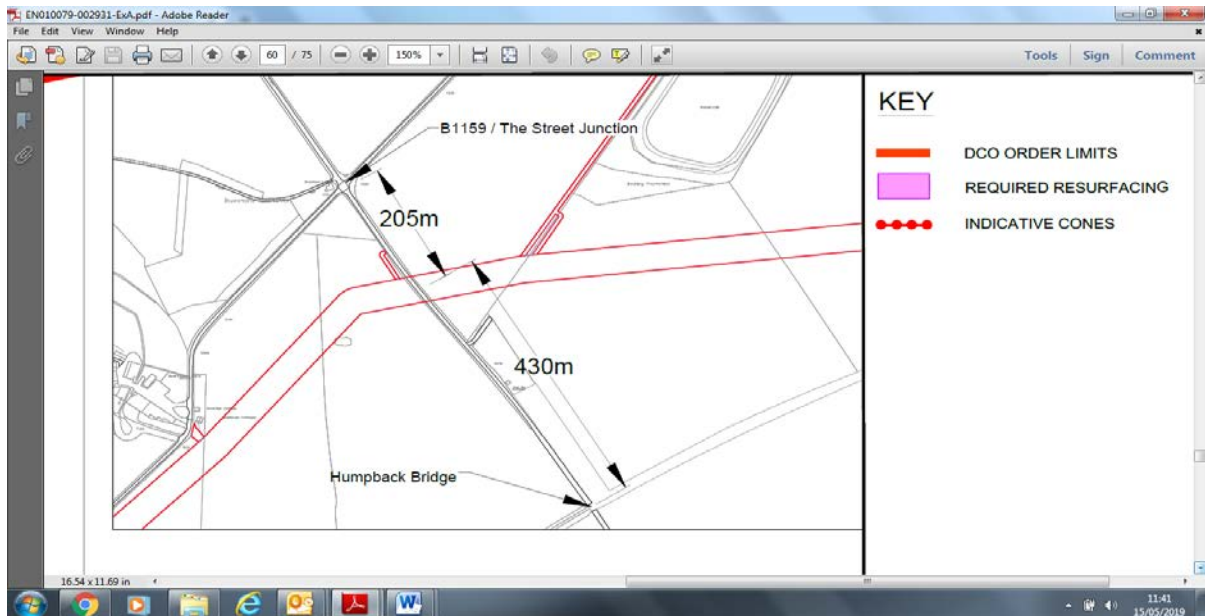
*The access used by the abnormal indivisible load would be access to ensure the route is of a standard to accommodate the transport delivery vehicles. Any restrictions would also necessarily be removed to accommodate the transport delivery vehicles and they would travel under controlled environments. The passage of abnormal indivisible loads would, however, lead to some limited driver delay as the loads would move slowly.*

OPC questions whether the passage of AIL's would have to be curtailed during roadworks as it may be seen as a 'Restriction' and therefore deemed an unsuitable route?

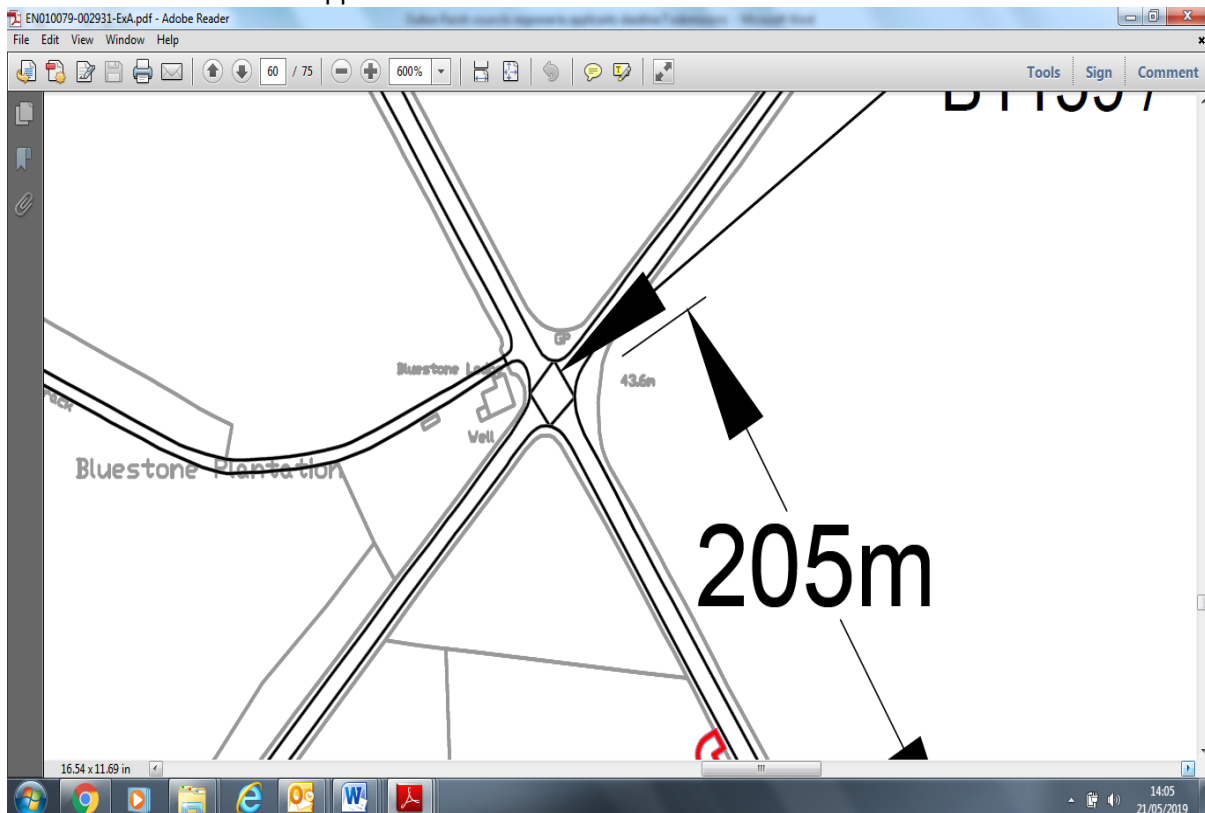
The road layout below shows that there will be 205m between the Junction B1149/The Street and the road works. OPC observe that the road intervention scheme widening of the junction will result in a reduced distance due to the Bellmouth entrance at the junction. It appears that the plan used



does not include the modifications. OPC also question whether the traffic works during trenching will result in tail backs at the junction and to the hump back bridge on B1149 especially if there are ALL arriving and departing from HOW3 Main Compound. OPC have already highlighted this issue in regard to the VISSIM modelling and the very real dangers this would present.

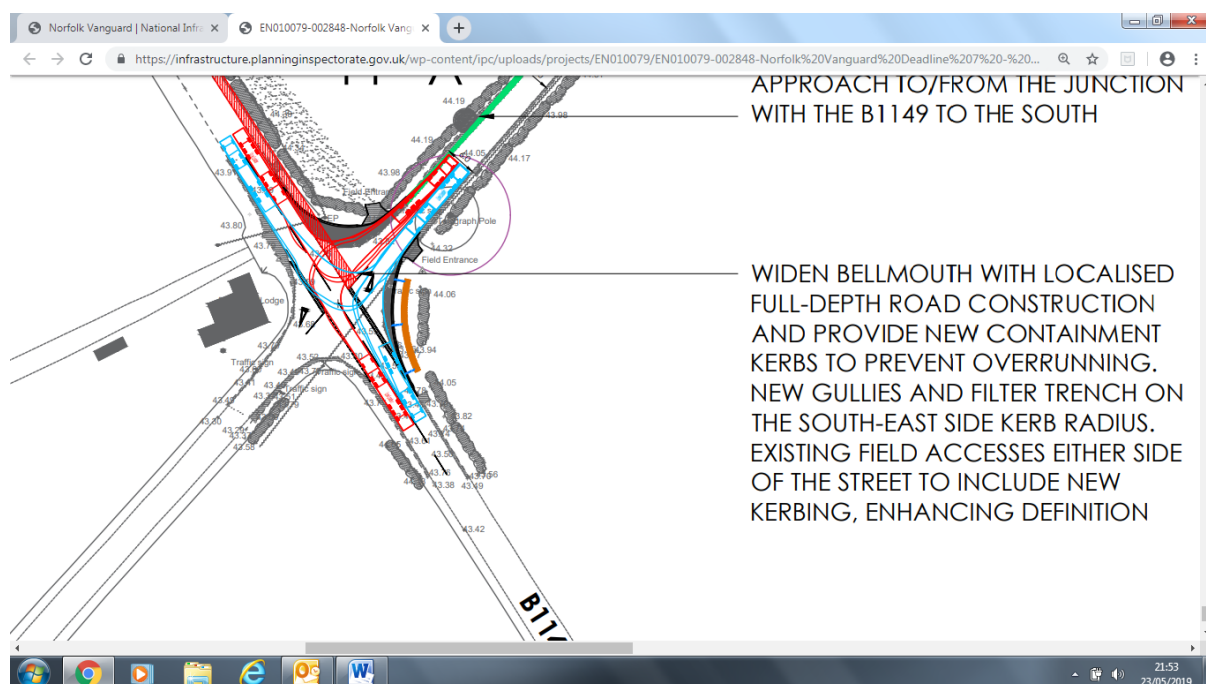


Junction appears to be shown without the bellmouth modifications.





## Road intervention scheme bellmouth junction The Street/B1149



### **Conclusion and OPC position re Statement of Common Ground (SOCG)**

OPC have participated in all aspects of the examination process and believe they have highlighted the very real concerns and issues. These have been acted upon by the ExA and the applicants in an effort to seek clarification. Oulton finds itself in the unique position of not just one project but two projects which will impact one property directly as well as the wider community. Oulton will be impacted by both Link 68, the villages' access to The Street/B1149 Holt and Norwich, and Link 75 the villages access to Blickling Road and Aylsham.

OPC reiterate that they support offshore wind but that the current onshore disruption proposed by Vattenfall & Orsted by construction traffic and cable routes crossing Norfolk and the way in which National Grid allocates connection points needs to be fundamentally reviewed. These two projects highlight the problem of connection points. A more direct route needs to be found, such as the use of an offshore ring main. The increasing need to add offshore wind to the UK energy mix appears to be aimed disproportionately at the East coast of England. Norfolk therefore can expect further disruption in the future unless better solutions can be found. Is it reasonable to expect that one part of the country should experience so much disruption?

Oulton Parish Council have also determined that signing any form of SOCG with the applicant does not add anything meaningful to the planning process, and could, in future be misinterpreted as it having reached an acceptance of the project, should it proceed. The council have therefore declined to do so and have advised the applicant of its decision.

Appendix 1 current permit details for Intensive Turkey Farm.....

DP3632YL Variation and Consolidation.pdf - Adobe Reader

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Tools Sign Comment

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**Status log of the permit**

Description	Date	Comments
Application EPR/HP3033UW/A0001	Duly made 29/01/07	Application for an intensive farming poultry installation permit.
Schedule 4 Notice response received	25/05/07	
Schedule 4 Notice response received	18/06/07	
Additional information received	16/07/07	
Permit determined EPR/HP3033UW	24/08/07	Permit issued to Bernard Matthews Foods Limited.
Application reference EPR/HP3033UW/V002	Duly made 22/10/10	Application to vary the permit to increase the animal numbers up to 132,000 turkey places.
Variation issued EPR/HP3033UW	02/11/10	Varied permit issued.
Application reference EPR/HP3033UW/V003	Duly made 18/11/13	Application to vary the permit to include biomass boilers.
Variation issued EPR/HP3033UW/V003	10/12/13	Varied and consolidated permit issued in modern condition format.

1305  
27/05/2019

**From:** [REDACTED]  
**To:** [NorfolkVanguard@pins.gsi.gov.uk](mailto:NorfolkVanguard@pins.gsi.gov.uk)  
**Cc:** [REDACTED] [Parish Clerk](#)  
**Subject:** Oulton Parish Council deadline 9 submission - registration no: 20012656  
**Date:** 06 June 2019 10:56:15  
**Attachments:** [Oulton Parish Council deadline 9.docx](#)

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Please find attachment of Oulton Parish Councils deadline 9 response.

Regards,

Susan Mather

PP

Paul Killingback Chair

Oulton Parish Council

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**Oulton Parish Council's observation on Applicants response at deadline 8 re Noise Assessment for The Old Railway Gatehouse and OTMP (deadline 8) for Link 68**

Oulton Parish Council (OPC) wish to reiterate their ongoing concerns in regard to how the Noise Assessments have been carried out in respect of the cumulative impact of Norfolk Vanguard and Hornsea Project Three both constructing at the same time and using the same access routes.

The Noise Assessment and the use of 18hrs as the methodology to produce the final results has assumed that the routes will be used in the same way as existing traffic, and that inputs to produce a noise model would be a generic mix of vehicles as currently exists, spread out over those 18hrs (day time). The model for NV/HOW3 is different as there are known numbers of vehicles, type and operating times.

The averaging of traffic noise over 18 hours gives the wrong outcome when the majority of the construction traffic will pass The Old Railway Gatehouse over a **12 hour** period and if Peak delivery time restrictions are imposed for HGV's on LINK 68 as well as other routes this will further impact by adding to the hourly rate of traffic movements over a reduced **10.5 hour** working day; the assumption is that the same number of vehicles will still have to run daily to meet the demands of the construction process or the construction process will need to be extended.

***E.g. NV 96 HGV's 12 hour day = 8 an hour (Peak) or with peak time restrictions 10.5 hour day = 9 an hour (Peak)***

***Cumulative with HOW3 214 HGV's 12 hour day = 17 an hour (Peak) or with peak time restrictions =20 an hour***

The outcome for traffic noise at any given point along a route is governed by the project working hours, imposed peak time delivery restrictions, the speed of traffic and a roads ability to function exactly as assessed; this is not what happens in reality. **The reality of Noise generated over a concentrated 12 hour day (or 10.5 hours if peak time delivery restriction is imposed) will be different from the 18 hrs as in the Noise Assessment and will be noticeable.**

The measured speed by HOW3 of 69kh (42mph) and 96.6kh (60mph) as used by Vattenfall to form the Noise Assessment is flawed as the whole of 'The Street' will be subject to a speed restriction of 30mph. This means the data input into the noise assessment is not correct for the projects lifetime.

Both projects have used the reduction in speed as a form of mitigation. OPC have with both projects tried to point out that with a speed reduction comes a build-up of vehicles along this route, especially with HOW3 Abnormal Indivisible Load's (AIL) whose speed will be below 30mph. During the delivery of HOW3 AIL's there will be the need to stop traffic movements along 'The Street' this will further constrict the flow of traffic.

Both projects have accounted for the numbers of their construction HGV's and along with the formation of passing places to accommodate two HGV's an assumption is that this will result in a steady traffic flow. Both projects have only produced a snap shot of traffic over a few weeks by the use of ATC or estimation of traffic numbers. Other traffic in the form of agricultural vehicles and HGV's is an unknown quantity and this will vary over the course of the year, dependant wholly on where and when a specific harvest is and the time of year. Harvest periods are now longer due to the more varied crops produced. OPC are still of the opinion that these factors have not been fully understood. In the OTMP the delivery management measures propose to liaise with local groups re harvests etc. in order to seek a managed delivery without impacting on construction work. OPC question how this will be achieved when taking account of how many farms will be impacted and how this will be coordinated during busy harvest periods without further condensing construction delivery hours?

The combined construction work from two projects working across Norfolk at the same time on multiple routes is something the methodology used to assess noise (and air quality) has not been adequately accounted for. The use of mitigation to reduce noise levels to an acceptable 'minor adverse' on paper is speculative and remains to be proven.

Susan Mather  
PP  
Paul Killingback Chair  
Oulton Parish Council