

From: [REDACTED]
To: [Norfolk Boreas](#)
Subject: Oulton Parish Council response at deadline 3/registration no: 20022619.
Date: 19 December 2019 16:28:43
Attachments: [BOREAS-OPC submission at Deadline 3.docx](#)

Dear Sir/Madam

Many apologies Oulton Parish Council is resending an earlier email as the registration number was omitted.

Please find attached Oulton Parish Councils response at deadline 3.

OPC would like to request an additional Open Floor Hearing to be included as part of the examination after the decision date for Hornsea Three DCO 31st March 2019.

The decision will have implications on Cawston & Oulton and Norfolk Vanguard/Boreas.

OPC would also like to attend & speak at future Issue Specific Hearings relating to onshore matters.

Regards

Susan Mather

PP Oulton Parish Council

NORFOLK BOREAS

Oulton Parish Council's response at Deadline 3

to the Applicant's "Clarification note-Cable Logistics Area" and to the Applicant's response to written questions at Deadline 2

1. Clarification note - Cable Logistics Area

'The cable logistics area is a single location of existing hardstanding to allow the temporary storage of cable drums and associated cable jointing and pulling materials (e.g. pre-moulded joints, winches, cable runners) close to the cable route. This facility may also accommodate a site office, welfare facilities and associated temporary infrastructure to support the cable pulling works.'

Oulton Parish Council (OPC) notes that the Applicants have reiterated that their preference is to deliver cable drums directly to the jointing pits, and have suggested that the Cable Logistics Area (CLA) would only be used for 'buffer' storage if needed. However, the CLA is in effect *the only storage facility for the entire project* during the cable pulling phase and it is clear that both cable drums and other "associated materials" will be distributed from there to other parts of the cable route. The 'just in time' nature of construction suggests that there will always be a rolling reserve of cable drums and associated materials in storage, ready for delivery in case of mishap to any part of the cable route.

The Applicant's Cable Logistics Area - just like Hornsea Three's Main Construction Compound, also in Oulton - is a convenient location for a *central distribution compound for the whole project*, and will be used as such.

In view of the above, and to avoid the creeping expansion of the function of the CLA over time, OPC seeks assurance that requirements will be secured in the DCO to stipulate that "associated materials" that might be stored at the CLA, during either Scenarios 1 or 2, *will never include* aggregate, soils or any general building materials.

In addition, OPC notes an omission at Point 22 in the Clarification Note. This point states: *"Norfolk Boreas Limited is committed to ongoing engagement with Norfolk Vanguard Limited, Hornsea Project Three, Broadland District Council, Cawston Parish Council and NCC to finalise the scheme design post-consent and is committed to adopting the preferred mitigation scheme option for Norfolk Boreas under both scenarios, to ameliorate the potential traffic impacts."*

We respectfully request that Oulton Parish Council be included in the above list, and that the Applicant's commitment to post-consent consultation be secured in the DCO.

2. Traffic issues

2.1 Heydon Road section of Link 68

From Cable Logistics Area: Clarification Note:

"3.1 Norfolk Boreas Traffic Mitigation

17. The Heydon Road section of Link 68 has been identified in the OTMP (REP1-022) as requiring mobile traffic management (pilot vehicles). Table 4.3 in the OTMP (REP1-022)

highlights that “some localised carriageway widening may be required”, i.e. the introduction of passing places where required.”

It is noted that – for the first time – mention is made here above of a requirement for some localised road widening (passing places) on *the Heydon Rd section* of Link 68. OPC have not seen any plans indicating the precise location of these passing places. We have concerns as to whether this would impact the residents of Heydon Rd, and as to whether these modifications are to be temporary. It is also noted that, with the road modifications on the rest of LINK 68 ‘The Street’ for HOW3/Vanguard/Boreas, this further extends the impacts on local residents’ ability to use the local roads without coming upon HGVs, temporary road closures or diversions, or having to be escorted down 1 - 1.5km of road by pilot vehicles in a convoy.

2.2 Cumulative cable drum deliveries IN and OUT

OPC have noted that the Applicants are intending to use ‘pilot vehicles’ along Link 68 and we understand that they will be using smaller cable drums, delivered by smaller low loaders, which count as an ‘ordinary’ HGV, rather than as an Abnormal Indivisible Load (AIL). However, Hornsea Three are committed to using AILs to deliver their cable drums to Orsted’s Main Construction Compound, owing to their use of larger cable drums. The subsequent departure of each AIL to deliver to the cable route will involve the holding back of traffic along Link 68 ‘The Street’ while each Abnormal Load (1,121 in total) proceeds to the B1149 Holt Road junction. The same will happen in reverse when their cable drums are delivered to the Main Compound.

OPC have never been given a satisfactory answer from either developer as to how traffic from each project will orchestrate the interaction between these particular traffic movements (regular pilot vehicle convoys versus regular AIL road ‘closures’), especially as it would be Hornsea Three’s Abnormal Loads which would have to be given priority, to prevent traffic backing up on the B1149 Holt Road with dangerous consequences.

OPC seeks clarification – yet again - as to the real-life feasibility of these two NSIP projects sharing the use of this same narrow lane as the access route to their two main compounds for their HGV traffic in both directions, over many years.

3. Applicant’s response to written questions at deadline 2

3.1 Cumulative impacts

The Applicants were asked about whether they have considered the cumulative impacts from the Sheringham & Dudgeon Extensions Project, which has recently submitted its scoping report to PINS. Their response could be summarised as a statement that the Vanguard/Boreas project “came first” and so it is not their responsibility to take the Sheringham and Dudgeon project into consideration. They claim that the cumulative impact of these Extension projects will only have to be considered after they in their turn submit for DCO.

This argument sounds superficially plausible, but only serves to highlight the deficiencies of the current planning practice of operating Chinese walls between separate planning applications, when considering projects of this magnitude. OPC appreciates that taking into

consideration other large projects that are only just entering planning may be inconvenient and unwieldy, *but the inconvenience to all onshore communities of NOT considering them will be disastrous by comparison.*

From another perspective, this situation also serves to underline the urgent need for central government **to plan and coordinate this massive and necessary expansion of offshore wind farms**, to eliminate the current folly of allowing the unnecessary repeated destruction of the onshore environment in this irrational and piecemeal fashion.

Future offshore projects have the potential to impact the same areas onshore over and over again.

OPC understands that the Applicant is not in a position to say *in any detail* how this new project may impact Norfolk Boreas, owing to limited information e.g. regarding the final location of the cable route. However, some acknowledgement must be made by the present Examination process of the existence of this new project in the pipeline, especially given the timeline shown below, including our addition of the final entry.

The timeline below, as put forward by the Applicants in their response to written question 4.1.1, illustrates the potential for overlapping cumulative impacts:

Timeline for projects

HOW3 cable installation single phase ...2021/2-2024

HOW3 cable installation two phases... 2027-2028

Norfolk Vanguard....duct installation.....2023-2024?

Norfolk Vanguardcable pulling.....2025-2026?

BOREAS SCENARIO 1....cable pulling..... 2026-2027

BOREAS SCENARIO 2...duct installation... 2023-2024

BOREAS SCENARIO 2...cable pulling ...2025-2026

**plus SHERINGHAM & DUDGEON EXTENSIONS ...onshore construction start 2023*

*(*this is the date given to OPC by Equinor's Project Engineer at a consultation meeting at Aylsham Town Hall 28/10/19)*

Given current knowledge about the status of several major offshore wind farm projects gearing up to enter the planning process, consideration *has to be given* by the Planning Inspectorate to the potential for other imminent and overlapping projects to have cumulative impacts. The need for this consideration is acute in view of the particular selection of onshore grid connections considered by the developers and National Grid. The choice of grid connection points seems to have been dictated *entirely by economic considerations*, with no regard given to the severe *onshore* environmental impacts of these choices.

Source:

[ES Appendix 4.3] "17. Furthermore, as part of the economic assessment, the whole life cost of the connection was considered by assessing both the capital and projected operational costs to the onshore network (over the design life of the project) to determine the most economic and efficient design option. National Grid produces the connection offer based on the result of the assessment, which is agreed by all parties involved."

3.2 The consideration of an alternative construction traffic route

From the Applicant's response to Written Questions at deadline 2:

Q.14.0.8:

Were other construction traffic routes considered, that would eliminate the need for construction traffic to go through the settlements of Cawston and Oulton Street?

Applicant's Response:

"...In conclusion, the impacts related to the requirement of major infrastructure works required to Sankence Lane and the use of restricted byways and crossing of Marriott's Way by HGV construction traffic were considered to potentially introduce significant environmental impacts and Link 68 would be a more viable route."

OPC were unaware that an alternative route (Sankence Lane) had been considered as an access to MA7 and the CLA, but we agree that such a route would be completely unfeasible for a great many reasons.

It is noted however that the final choice of route for Link 68 has nonetheless necessitated the need for a similarly extensive road intervention scheme for the 1km length of The Street. This scheme will require: the creation of a junction upgrade with B1149/The Street, the formalisation of passing places, road widening at the bend, smoothing of 'the hump' and priority signs, and the introduction of a 30mph speed limit along the entire 1km route. Interventions on this scale – and of course the density and size of the traffic that will use it - will completely transform this quiet rural lane into a noisy and congested industrial access road for an indeterminate period of many years.

Furthermore, we reiterate that for the first time there is mention of the creation of *further passing places* on a section of Link 68 - Heydon Road. OPC seeks assurances as to whether NCC Highways have agreed to this new development.
