

ORSTED - HORNSEA PROJECT THREE

EXTRACT FROM OULTON PARISH COUNCIL'S RESPONSE AT DEADLINE 7:

2. Noise and Vibration Assessment at The Old Railway Gatehouse

2.1 At the ISH on 8th 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 8th 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 8th 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.