

NORFOLK VANGUARD

Please find attached below a summary of Oulton Parish Council's response at Deadline 9 to the public examination of Norfolk Vanguard. This response was submitted to PINS on 6th June 2019.

Oulton Parish Council's observations on the Applicant's response at deadline 8:

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, when both are constructing at the same time and sharing the same access routes.

The Noise Assessment, including the use of a day-length 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 Norfolk Vanguard as distinct from HOW3 is different, as there are known numbers of vehicles, types and operating times.

The averaging of traffic noise over 18 hours produces an incorrect and misleading result, given that the majority of the construction traffic will pass The Old Railway Gatehouse over a 12-hour period. In addition, if peak-time delivery restrictions are imposed for HGVs on Link 68, as well as on other routes, this will have further impact by adding to the hourly rate of traffic movements over a reduced 10.5 hour working day, presuming that the same number of vehicles will still have to run daily to meet the demands of the construction process or else the construction process itself will need to be extended.

e.g. Norfolk Vanguard: 96 HGVs over 12-hour day = 8 an hour (Peak) or with peak time restrictions 10.5 hour day = 9 an hour (Peak)

Cumulative with HOW3: 214 HGVs over 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, peak-time delivery restrictions (imposed by NCC Highways), the speed of traffic, and the ability of a road to function exactly as assessed. The reality of noise generated over a concentrated 12-hour day (or 10.5 hours if peak-time delivery restrictions are imposed) will be different from an "average" noise generated over 18 hours (as in the Noise Assessment) - and it will be noticeable and adverse.

The speeds of traffic measured by HOW3 of 69kh (42mph) - and 96.6kh (60mph) as used by Vattenfall - to form the Noise Assessment are flawed, as the whole of this section of The Street will be subject to a speed restriction of 30mph (imposed by NCC

Highways). This in itself means that the data input into the noise assessment is unhelpful.

Both projects have used the reduction in speed as a form of mitigation. OPC have, with both projects, tried to point out that a speed reduction will produce a build-up of vehicles along this route, especially when incorporating HOW3 Abnormal Indivisible Loads (AILs), whose speed will be *below* 30mph. During the delivery of HOW3's AILs (1121 in all) there will be the temporary need to stop traffic movements altogether along The Street, which will further concentrate the flow of traffic afterwards.

Both projects have provided the traffic movement numbers of their construction HGVs and, by proposing the formation of longer passing places to accommodate two HGVs at a time, they presume that this will result in a steady traffic flow. Both projects have only produced a snapshot of baseline traffic over a few weeks by the use of an ATC (Orsted), or by an *estimation* of traffic numbers (Vattenfall). The pattern of additional traffic in the form of agricultural vehicles and other HGVs is an unknown quantity, as this will vary over the course of the year, dependent wholly on where and when a specific harvest takes place, and the time of year. Harvest periods are now longer due to the more varied crops produced. OPC are still of the opinion that both Applicants are persistently failing to understand these important additional traffic factors.

In the OTMP the delivery management measures propose a liaison with local groups and farmers 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 intense and extended harvest periods without further condensing construction delivery hours – or extending the construction period?

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 adequately accounted for.

The effectiveness of mitigation to reduce noise levels to an acceptable 'minor adverse' on paper is speculative and remains to be proven.

Susan Mather^{[L]_{SEP}}

pp^{[L]_{SEP}} Paul Killingback
Chair, Oulton Parish Council