

NORFOLK BOREAS

Oulton Parish Council's submission at Deadline 10

Oulton Parish Council (OPC) would like to state its final position on outstanding issues and make some concluding remarks.

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

Unresolved issues:

1) The Old Railway Gatehouse

OPC has been deeply disappointed that the Applicant has not seen fit to make any direct approach to the residents until a very few days ago. This has caused unnecessary distress and uncertainty for them and will now mean that discussions on suitable mitigation will be carried out under a severe time pressure.

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

We understand that the residents are concerned that the current measures on offer only include acoustic glazing and the construction of a wall around the part of the property to the **south**, but no mention is made of the need for protection from noise and emissions at the **northern** end of the property, where the need is just as acute.

It is hard to avoid the conclusion that the Applicant would have preferred to 'deal' with the residents of the Gatehouse post-consent, and therefore post-scrutiny.

However, OPC urges the ExA to ensure, in every way possible, that any mitigation measures are secured in the DCO and with a much higher status than "Optional". It is vital for instance that such measures should be firmly embedded with the rest of the Highway Intervention Scheme for Link 68, such that it is clearly understood that *whichever project goes ahead first (Hornsea Three or Vanguard/Boreas) the first developer is committed to carrying out those measures pre-construction on the Old Railway Gatehouse.*

In addition, we are obliged to point out that, if the very recently submitted further option for the HIS through Cawston, which includes moving MA6 from Salle to the B1149, is implemented then Bluestone Lodge and the two dwellings next to the humpback bridge on the Holt Road will be in dire need of similar mitigation.

2) Trenchless crossing of the B1149 Holt Road and HIS for Cawston High Street

OPC notes the submission to the ExA of a letter from NCC, as the Highways Authority, dated 27th April 2020. We are grateful for the depth and clarity of this letter, and feel that it lays out very fully before the ExA many of the highway matters that

remain – astonishingly – unresolved at this late stage in what is, after all, the *second* application by this same developer for the combined Vanguard/Boreas project.

Beyond the obvious issues of road-surface re-instatement, OPC agrees with NCC that the need that would be created by open-cut trenching for 24-hour traffic signals on the B1149 would have unacceptable impacts in terms of driver delay and the night-time noise of stopping and starting. It would also risk, at peak times, a dangerous backing-up of traffic towards the humpback bridge. In addition, BDC has already identified an unacceptable loss of hedgerow.

At the end of the Norfolk Vanguard examination, NCC states clearly that no agreement had been reached regarding the acceptability of the Cawston Highway Intervention Scheme (HIS). An update on the Cawston report and an update of the Road Safety Audit were due to be received by NCC on 3rd May 2019. Neither of these were received before the start of the Boreas examination – many months later - and, as stated in the letter: “the Applicants instead sought to progress the Cawston intervention scheme **during** the examination itself” (NCC’s emphasis).

This extraordinary and inefficient time-wasting on the part of the Applicant has caused great frustration to all Interested Parties and possibly to the ExA itself. It has certainly hampered the serious examination of the serious problems with the HIS for Cawston High Street and has created this lamentable situation at the very end of the examination where new schemes are still being introduced, with no possibility of proper assessment.

Again, it is hard to escape the conclusion that the Applicant might prefer to ‘deal’ with the intractable issue of Cawston *post-consent*, because this inevitably means *post-scrutiny by the ExA*.

The question has to be asked: if these critical matters relating to the crossing of the Holt Road and a feasible and safe method of getting HGV traffic through Cawston High Street are still being wrangled over at this very late stage - **is it because they are simply incapable of satisfactory resolution?**

If there is any doubt about this, then it would be dangerous for the ExA to permit this application to proceed into its post-consent phase without these matters having been resolved.

In the meantime, Oulton Parish Council is extremely concerned at the very recent *additions* to the number of options being considered now for an HIS for Cawston, including one which would move MA6 from Salle to the Holt Road. Whilst Oulton would never wish to stand in the way of an HIS that finally removed the dangers of increased HGV traffic from Cawston High Street, we object strongly to *the late arrival* of this new plan, and the fact that Oulton has had *no opportunity to study it in detail*, in discussion with NCC personnel. We have thus been deprived of the ability to assess properly its possible knock-on adverse impacts on *our* residents and we are concerned as to whether due process has been carried out.

3) Link 68

OPC are aware that NCC has accepted the Highway Mitigation Scheme for Link 68, but we would like it noted that the term used to describe it is only “adequate”. Since

it is largely an exercise based on the theoretical 'capacity' of a rural lane, we can only hope that their confidence will be justified.

Several of our concerns remain however, including our anxiety that the increased traffic on The Street and the B1149 will produce the significant potential for increased accidents if vehicles both large and small that are *not associated with the projects* misjudge the ability to pass one another at any point on the route. Driver understanding and judgement of how to operate the use of passing places on such a scale is notoriously unreliable. 'Passing places' as a traffic management solution to such a density of cumulative HGV traffic present their own problems in terms of driver compliance.

OPC would like to request that the ExA ensures that ***the removal of these passing places is secured in the DCO*** at de-commissioning stage, to prevent the legacy issues of a permanent industrialisation of our rural landscape.

Finally on this issue, the Parish Council remains concerned that the regular occurrence of highway congestion and dysfunction on Link 68 that will be created by the cumulative traffic generated by these projects will be entirely likely to displace large amounts of agricultural traffic from Street Farm and Saltcarr Farm and force them to choose over time ***to come north through the residential settlement of Oulton Street***. At present, residents are only forced to tolerate about 50% of the traffic generated by these agribusinesses, but many fear that the dysfunction and congestion created by these projects on the southern end of The Street will force the agricultural HGVs to change their routes - and there is no mechanism available to prevent them from doing so.

4) Link 75:

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 this narrow and tortuous rural road would be involved, which would be unrealistic.

Again, this sort of situation only serves to underline the point made by NCC Highways during ISH6 for the Hornsea Three project, 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*.

Summary:

In these closing stages of the Norfolk Boreas examination process, the following issues remain outstanding for the parish of Oulton and the surrounding area:

- clarity on the status, and even the possibility, of meaningful mitigation for the residents of the Old Railway Gatehouse
- concerns about lack of transparency and consultation over the very recent introduction of new plans to move MA6 to the Holt Road

- concerns about the continuing possibility of an open-cut crossing of the Holt road, leading to dysfunction and danger on that road
- continuing concerns about the feasibility and safety of the cumulative density of two-way HGV traffic on Link 68, given the real limitations of passing places as a solution
- serious concerns about the likelihood of large amounts of displaced agricultural HGV traffic coming through the residential end of The Street
- lingering misgivings about the real nature and function of the Cable Logistics Area.

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

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

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

Concluding Remarks:

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

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

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

OPC are of course acutely aware that the effects on this community are only a small consideration when compared to the potential benefits of this enormous offshore wind farm. We are also, however, acutely aware that many other issues with this project **appear to remain unresolved** at this late stage.

Some of these unresolved issues onshore, include:

- The number, enormity and siting of the substations at Necton and the total inadequacy of the mitigation proposed;
- The intractable problems surrounding an acceptable HIS for Cawston;
- The continuing concerns at Happisburgh about cliff erosion at the landfall site;
- The continuing concerns about the engineering of the cable crossover point between the two projects and its possible health effects;

- The enormous concerns expressed by NNDC about the disastrous effects on tourism

...and there are many more.

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

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

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

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

Co-ordinated *offshore* grid connection infrastructure can be constructed, which would entirely obviate the need for such devastating disruption of the environment, businesses and communities across the whole of Norfolk.

Finally, and notwithstanding the deep concerns we have expressed about the distortion of the past two months of this planning process by the coronavirus crisis, Oulton Parish Council would still like to take this opportunity to thank the Examining Authority for the rigour of its questioning throughout the examination.
