



Q.5.4.0.1 Projects included in cumulative impact assessment

Provide any comments that you wish to make further to the Applicant's response to the ExA question at ISH5 [REP13-016, ref 8c)] and follow up from OFH2 [REP13-014, ref 4] in which the Applicant confirms that its response to WQ1 [REP2-021, response to Q4.0.1] stands regarding not including the Dudgeon and Sheringham Shoal extension project(s) in the cumulative impact assessment for the Proposed Development.

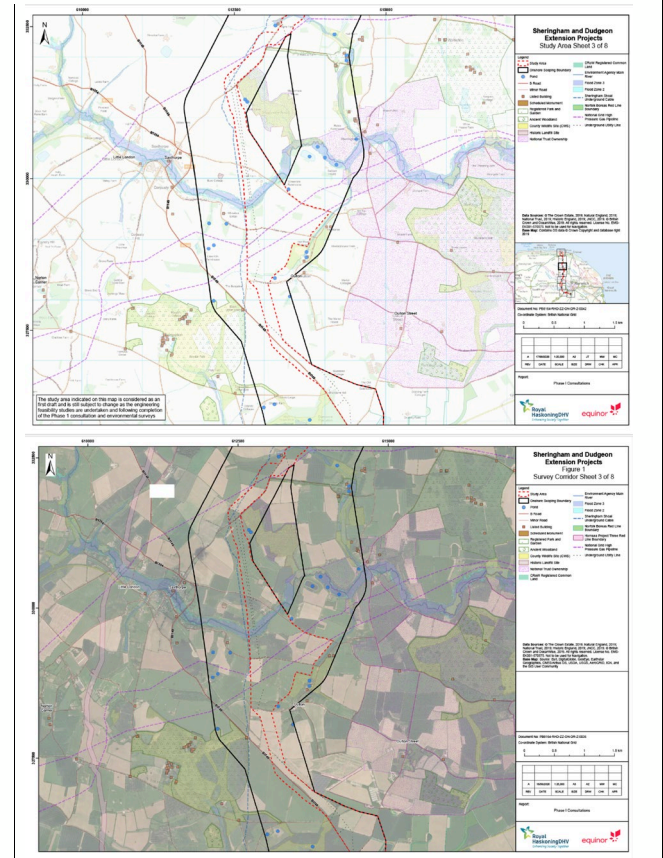
Answer 5.4.0.1 Oulton Parish Council

(OPC) and residents have recently received leaflets from Equinor along with a link to an online consultation page for the Sheringham & Dudgeon Extension Project (SEP/DEP). This online link has highlighted a revised cable route search area, part of which includes the Cawston & Oulton areas, and in particular the red dotted line study area, which takes in the B1149/The Street up to 'The Old Railway Gatehouse'.

OPC noted from watching the virtual ISH 5 & the ExA question that the applicant will not be considering cumulative impacts with Vanguard/Boreas Scenario 1/2 and the SEP/DEP extension project, due to "insufficient information" available. **OPC disputes this fact** as it is clear that the SEP/DEP cable route will be forced to cross, at a point near to Cawston/Oulton/B1149, with the Vanguard/Boreas cables. This is a serious technical issue.

OPC wish to submit into the Boreas Examination all of the material which is currently being used for public consultation, as SEP/DEP proposes a time-scale which overlaps with the construction of Norfolk Boreas. (see annex 1)

The HISs are currently in agreement for HOW3/Vanguard/Boreas, with the first project to construct implementing the HIS and the last decommissioning. In the case of SEP/DEP project this could involve Oulton Street's HIS, given the potential location of the cable route. There is also the potential cumulative traffic with Boreas Scenario 1 or Scenario 2 with SEP/DEP.



OPC note that in ALL scoping reports there is mention of advice notes nine & seventeen, which is guidance on how to assess cumulative impacts from other projects. The item '**Projects on the Planning Inspectorate's Program of Projects**', highlighted in the list below, would seem to meet the criteria for the SEP/DEP project to be included in this Boreas Examination, as it appears on the Planning Inspectorate's list of projects - and Norfolk Boreas is still at the examination stage.

See extract below:

188. The Planning Inspectorate Advice Notes Nine and Seventeen provide guidance on plans and projects that should be considered in the CIA including:

- *Projects that are under construction;*
- *Permitted applications, not yet implemented;*
- *Submitted applications not yet determined;*
- **Projects on the Planning Inspectorate's Program of Projects;**
- *Development identified in relevant Development Plans, with weight being given as they move closer to adoption and recognising that much information on any relevant proposals will be limited; and*
- *Sites identified in other policy documents as development reasonably likely to come forward.*

Projects

The projects listed are those:

- Where the developer has advised the Planning Inspectorate in writing that they intend to submit an application to us in the future
- Where an application has already been made to the Planning Inspectorate and is undergoing the development consent process
- Where a proposal has been decided.

Project	Developer
Riverside Energy Park	Cory Riverside Energy
Rookery South Energy from Waste Generating Station	Covanta Rookery South Limited
Seabank 3 CCGT	SSE plc
Sheringham and Dudgeon Extension Projects	Equinor
South Hook Combined Heat & Power Station	QPI Global Ventures Ltd
South Humber Bank Energy Centre	EP Waste Management Limited
Southampton to London Pipeline Project	Esso Petroleum Company, Limited
SP Mid Wales (Electricity) Connections Project (SP Manweb)	SP Manweb
Sunnica Energy Farm	Sunnica Ltd
Tees CCGP	Sembcorp Utilities (UK) Limited

Equinor's SEP/DEP Ext project will include previous projects as part of their CIA but those projects (HOW3/Vanguard/Boreas) will not include the impacts from SEP/DEP. This means that consented DCOs will be missing potential cumulative impacts, which may significantly affect their Highway Intervention Schemes (HIS) and traffic movements and numbers, when ALL projects start construction, in overlapping timeframes.

OPC strongly suggest that there is both a procedural and a material case for covering this possibility in the DCO. The ExA for Vanguard decided not to consider some of the cumulative impacts of Boreas, and this mistake is already being challenged.

See extract below from Equinor's Scoping report.....

- *Projects identified as having a potential cumulative impact include Norfolk Vanguard, Norfolk Boreas and Hornsea Project Three, three offshore wind projects which make landfall on the North Norfolk Coast and have onshore cables routes leading to Necton and Norwich respectively. Agreement of the projects to be taken into account as part of the CIA will be undertaken during the subsequent stages of the EIA.*

Q5.4.0.7/Q5.4.0.8 Community liaison

The OCoCP sets out the role of a Community Liaison Officer [REP10-013, Section 2.4] and the role of an Agricultural Liaison Officer [REP10-013, Appendix B]. The OTMP sets out the role of a Traffic Management Plan Coordinator [REP10-017, Section 5.3]. The ExA notes that there is an indicative outline of the role description for the Traffic Management Coordinator.

a) Provide a fuller description of all three roles, including:

- *key responsibilities*
- *part time or full time;*
- *location;*
- *duration of contract;*

- *b) The ExA notes that there would be project wide Local Planning Authority investigation procedures [REP10-016, Section 5.2] and [REP10-012, Section 2.4] in place. Is the role of the proposed Community Liaison Officer to provide an on-the-ground, local presence to enable a rapid and effective response to community concerns, in locations such as Necton, Cawston, Oulton and Happisburgh?*

Answer to Q5.4.0.7/Q5.4.0.8

OPC would expect a liaison officer, given the number of projects affecting local communities and businesses. All would require a point of contact. It may even be that there is a need for an over-arching coordinator for ALL projects. The current cumulative impact from HGVs seems to have been the main focus, but projects would still need to take into consideration and manage effectively other traffic involved with the projects, as well as agricultural traffic and other road users.

Local communities will need to be informed of when construction will start, where there might be diversions and road closures, along with clear maps of alternative routes well ahead of time and for how long. Agricultural businesses would also need to know how road closures and diversions will impact their access to fields, and planting and harvesting schedules, as well as best or alternative routes during construction.

OPC is still fearful that this will result in all of the agricultural traffic coming through the residential end of Oulton Street because of delays or restrictions at the southern end of The Street. As well as traffic issues there may be noise issues which the community may need to raise as a concern during the construction phase, again requiring a dedicated contact point. There should also be clear project identification of vehicles using shared construction routes so there is no confusion between projects.

- ***Respond to this question in light of the representations during OFH3.***
- *c) Where and how are these details secured?*
- ***d) Other Interest Parties may wish to comment.***

The Parish Councils need to be a point of contact, and liaison officers should be required to attend PC meetings when asked to do so, so that information can be posted on parish noticeboards and websites or via residents' contact lists.

Q5.16.0.1 SoS Decisions and letters regarding other NSIPs

The Applicant has set out its view on the implications on the Proposed Development of the Norfolk Vanguard decision and the SoS Hornsea Three letter [REP13-025]. Points were also made at ISH5 [EV14-004].

- *a) Provide the ExA with any views you have which do not accord with the Applicant's opinion as set out in the above document and particularly Appendix 2, which sets out the relevance of the SoS Norfolk Vanguard decision on the Proposed Development, topic by topic.*
- *b) Any other matters arising as a result of the SoS Decisions and letters regarding other NSIPs, which you wish to draw to the ExA's attention should be set out here, stating implications and actions you would wish to see.*

Answer to 5.16.0.1

a) OPC notes with concern the force, manner and content of the Applicant's views as set out in REP13-025 and ISH5 [EV14-004]. Of course the principle of consistency in planning decisions must be upheld by decision-makers, but the NSIP planning process is surely not a simple matter of an ExA recommending to the Secretary of State that he approve a major project *because he approved a very similar one recently*. This would make a mockery of the whole process and would risk bringing the Planning Inspectorate into disrepute. And yet this is virtually what REP13-025 is strenuously insisting.

If the Applicant wished for their two projects – Vanguard and Boreas – to be treated as so very similar, then maybe they should have submitted them together as 2 phases within one application. However, they chose not to do that and, in addition, they requested that some aspects of the cumulative impacts of the two projects (e.g. the increased number of substations at Necton) should be considered by this *Boreas* ExA – and not at the Vanguard stage. They claimed this was reasonable on the grounds of insufficient detail being available at the time, and yet the full Boreas application was submitted to PINS on *the very day after the Vanguard Examination closed*. The details of these Boreas substations were well known at the time. This Applicant should not be allowed to have their cake and eat it too.

There are genuine and significant cumulative impacts arising from Norfolk Boreas and these merit careful consideration when weighed in the planning balance – precisely because Norfolk Vanguard has been approved. The decision to approve Vanguard means that, if Boreas is also approved, then there will definitely be 4 enormous substations (as well as the national grid extensions to their substations) at Necton – instead of 2 - and these are not a “temporary” impact.

There are further issues that remain unresolved, even after *three* ExAs have attempted to get them resolved - the most obvious of which is the impact of traffic through Cawston. The SoS decision letter on Vanguard is extremely unsatisfactory on this particular issue, and simply leaves the matter to be specified in the DCO to be resolved at a future date, with the agreement of NCC Highways and Broadland DC. This is a shocking example of passing the buck to authorities who will have no leverage in these future negotiations, as construction imperatives – post consent - will become paramount.

Cawston and Oulton PCs have had many meetings with both these authorities and we are well aware of their misgivings about the eventual ‘solution’ that *they will be forced to agree to*. At best, it will be a very risky and very destructive dog’s breakfast.

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OPC urges the ExA to remain true to their professional instincts and to continue with their stringent and independent analysis of the costs and benefits of this application

Finally, in addition to the above, the ExA is probably aware that a concerned Norfolk resident has filed with the Administrative Court an application for permission to proceed to a substantive Judicial Review on the Norfolk Vanguard decision.

Answer to 5.16.0.1

b) Requirement 16. trench-less crossing of B1149

OPC feels there is still some confusion as to whether the new requirement for a trench-less crossing is only required if Hornsea Three proceeds to construction, or if the requirement is irrespective of HOW3.

In the S of S decision letter it seemed to specify the requirement was for a trench-less crossing - it did not specifically mention Hornsea Three.

Requirement 18: providing for a trench-less crossing at the B1149 (and consequential changes later in the DCO);

The ExA recommendation report did however mention Hornsea Three...

4.77The ExA's consideration of the issues led it to conclude that the B1149 should be subject to trench-less crossing for the onshore cable route. However, the ExA does make the point that the need for trench-less crossing of the B1149 would be avoided if the Hornsea Project Three development was not granted consent as it would be easier to manage the traffic from the single development. [ER 4.7.110 et seq]

set out here, stating implications and actions you would wish to see.

OPC noted that during the ISH5 the trench-less crossing was discussed and consequently the **updated draft DCO** has been amended to..

(t) In circumstances where the Hornsea Three Off-shore Wind Farm Development Consent Order is made and its development commences, there shall be trench-less crossing of the B1149 (Work No. 6).

The implication here is that trenchless crossing might NOT be required if HOW3 does not go ahead.

OPC query the wisdom of this, as it was **NCC** who were concerned about the integrity of the road, post trenching work, under any circumstances.

If HOW3 does not proceed there remains an issue of very large agricultural traffic regularly using the B1149 during trenching work, which would have difficulty manoeuvring around the road works (combines, potato harvesters, pea viners etc.).

Norfolk Boreas is still proceeding with Scenarios 1&2 so there is still the need to consider Vanguard/Boreas Scenario 1 or Scenario 2 as well as Boreas Scenario 1 with SEP/DEP. The Applicant has consistently under-estimated the importance of the B1149 as a radial route from Norwich to the coast, and OPC feel that the trench-less crossing should be included in the DCO, regardless of whether it is in combination with HOW3 or is a standalone project.

In any case, NCC Highways has always strenuously maintained that it would be ill-advised to disturb the integrity of the substructure of the road by trench-cutting as, given the volume of heavy and agricultural traffic, the road surface would be liable to subsidence thereafter.

See extract below:

NCC (REP5-066) Deadline 5 Submission - Response to the Applicant's clarification note on trench-less crossings.

Long-Term Maintenance Liability Review

The issue of long term maintenance liability remains a concern, particularly given the potential for other future large scale projects and their associated HGV load movements. Rural road structure can vary greatly and with an increasing volume of base level traffic, notwithstanding the additional loading from these HGV movements. Any weakening of the surface construction derived from breaking open the bound and sub-grade layers will greatly increase the risk of carriageway failure in years to come when it has reverted to local authority responsibility.

Q5.16.0.3

*The Applicant;
Other Interested Parties*

Need

As it is now over a year since the application for the Proposed Development was submitted, set out any points additional to those in your application, on the need for the Proposed Development that you consider would be important and relevant to the planning balance case for the SoS decision. Other parties may wish to comment.

OPC's comments on Q5.16.0.3

In terms of climate change, the need for renewable energy has only grown during the year since this application was submitted.

However, and for this very reason, the need has also grown for the planning and implementation of an integrated offshore transmission network to connect **all** these wind farms to the grid, thus obviating the need for destructive and repeated disruption to the onshore environment.

OPC therefore requests of the ExA that it recommends to the SoS that **Norfolk Boreas be included in the remit of the Offshore Transmission Network Review**, launched by BEIS on July 15th this year.