

NORFOLK BOREAS

Oulton Parish Council's submission at Deadline 15

Oulton Parish Council (OPC) wish to comment on the Applicant's responses at deadline 14, especially with regard to issues relating to Oulton.

1. Cumulative adverse effects over time in Broadland District

ExA Q5.4.0.3: Cumulative adverse effects over time in Broadland District

At OFH3, the ExA heard submissions that there would be 11 years of cumulative construction stage adverse effects relating to traffic, noise and vibration, air quality, onshore heritage, health and visual would be felt by communities in Broadland District if the Order was consented.

*Confirm what the worst case scenario would be (duration of specific construction activities and number of years in total) for Cawston, **Oulton** and the crossing north of Reephams, based on the projects included in your cumulative assessment.*

Applicant's response to Q5.4.0.3.....

The construction works which affect communities in Broadland District are associated with the onshore cable route construction. That is the duct installation and cable pulling works for Norfolk Boreas and Norfolk Vanguard, and the works referred to by HP3 as the onshore cable corridor construction, comprising the installation of the onshore export cables for HP3. Prior to these works there would be some pre- construction works such as environmental surveys. However, for the purpose of this worst case, commencement refers to the start of the main construction works on the onshore cable route.

OPC note that the Applicant is referring to the cable route only and has *not included* either HP3's Main Construction Compound (MCC) or Norfolk Vanguard/Boreas's Cable Logistics Area (CLA) as part of the cumulative adverse effects in Oulton. OPC feel the need to point out yet again that there will be two storage areas sited at Oulton, which are centralized, specific storage areas for each project, and that storage areas of this kind *do not appear anywhere else along the cable routes* for any of these projects.

The Applicant also seems to suggest that because work *on the cable route* is for a limited period at any given location, the adverse effects are temporary and transient. However, Oulton has additional and prolonged disruption from traffic going in and out of the compounds - which include Boreas's CLA, and with HP3's Main Construction Compound being the worst-case scenario, as in the traffic mix there will be hundreds of Abnormal Loads (ALs).

The timelines, which the applicant has included in their recent response, appear to bring the construction period down to 6 years, as opposed to OPC's understanding of 8+ years. This is the first time all three projects' timelines have been set out, and this timeline is also dependent on each project being successful in the CfD auctions. It is unclear whether these start dates include pre-construction work and *commissioning works* at the end of construction. For instance, Oulton PC's understanding of 8 – 10 years of potential disruption from the Main Construction Compound for HP3 is based on Orsted's statement to us that their project would be constructed in 2 phases of up to 3 years each, with a 2/3-year interval in between (to accommodate the next CfD), and finally

a 2-year commissioning phase. For all of this time their Main Compound at Oulton would be required.

OPC have put together their own timeline table (see below), which highlights the cumulative impacts for Oulton, both in terms of extended construction and traffic impacts but also the impact from potential road closures and diversions at any given time. OPC are aware that not all of these access routes will be closed or diverted at the same time, but it does highlight the rolling impact on communities that are at the centre of so many projects in the same area. The complexity of these multiple projects has the potential to sometimes leave Church Lane as the only road available as a route out of Oulton. This is a very narrow lane, used regularly by agricultural vehicles, and with very few opportunities for traffic to pass in two directions.

In addition, there is the possibility that, if *SEP/DEP start their construction in 2024, then the western part of Oulton becomes another restricted area, as Oulton has been identified by the SEP/DEP project for their cable route search area. This would necessitate Church Lane itself being crossed at some point, creating a further road closure and diversion.

OULTON	Timelines for projects	Cumulative construction impacts on Oulton	Cumulative traffic impacts on Oulton
		<i>HP3 Main Compound/ MA7/ Cable Logistics Area/ Cable route</i>	<i>HP3/ NV/NB: Scenarios 1 or 2.</i>
HP3 2022-2028/30 Main Construction Compound	2022-2024: Phase 1 2024-2026: Potential 3 year gap 2026-2028: Phase 2 2028-2030: Commissioning phase	Main Compound for the entire HP3 project in situ 2022-2028/30 NV: MA7/Cable Logistics Area/cable route	2022-2024 HP3/NV - traffic peak - 214 HGVs <i>Staff other/ 210 daily.</i> 2026-2028 HP3/NB <i>153 HGVs/other traffic130 HP3 +NV?</i>
Norfolk Vanguard 2022-2027	2022-2024.....2 year duct installation 2025-2026cable pulling NV	HP3 Main Compound 2022-2028/30 NV: Cable Route/Cable Logistics Area/MA7	2022-2024 HP3/NV <i>214 HGVs</i> <i>Other project traffic 210 daily.</i> 2025-2027 NV/HP3 <i>HP3/NV 183 HGVs</i>
Norfolk Boreas Scenario 1 2026-2028	2026-2028: cable pulling	HP3 Main Compound 2022-2028 NB: Scenario 1 cable pulling - Cable Logistics Area	2026-2028 HP3/NB Scenario 1 <i>Traffic 183 HGVs + other traffic 130+ ?</i>
OR: Norfolk Boreas Scenario 2 2023-2028	2023-2026: 4 years of ducting & cable pulling	HP3 Main Compound 2022-2028 NB Scenario 2 MA7/Cable Logistics Area	2023-2026 HP3/NB Scenario 2 <i>Traffic: 183 HGVs + other traffic 130 +?</i>
*SEP/DEP Ext project	Potential Start 2024 2 Phases		

Potential road closures and diversions affecting North /East /South of Oulton Parish

- a) Oulton/Oulton Street via Link 75 Blickling Rd.....trenching road works on Aylsham Road....access to Aylsham will require a long diversion.
- b) Oulton Street via Aylsham Rd.....cable route crosses this section.....diversion required for access to Aylsham.
- c) Link 68.....Heydon Rd.....Cable route crosses this section.....diversion required for access to Aylsham.
- d) Link 68 'The Street' via B1149.....Currently trench-less crossing is only being proposed if HP3 proceeds. If NV/Boreas Scenario 1 or Boreas Scenario 2 proceeds without HP3, then the B1149 road works and traffic control will result in significant potential delays.
- e) *SEP/DEP potential road closures or diversions.....Church Lane, Blickling Rd.
- f) HP3.....Although Oulton is not on the cable route, the Main Construction Compound will see the arrival and departure of **1,121 cable drums** and will require traffic to stop while the AILs travel the 1km to and from B1149, as well as traffic control on the B1149 (see HP3 VISSIM information REP1-054).

2. Assessment of community effects.

----- ExA Q5.4.0.5:

It is unclear to the ExA where the overall effects on communities such as Cawston and Oulton are set out in the assessment when taking into account cumulative effects from other projects and inter-relationships [APP-219, para 40] (also referred to as intra project effects in the human health assessment [APP-240]).

Applicant response...(extract)

As the footprint for environmental impacts is restricted to the areas adjacent to the cable route, the Applicant assessed communities along the route as a population...

The Applicant conducted a cumulative impact assessment with other proposed wind farm development where sufficient information was available to do so, namely Norfolk Vanguard and HP3. Both Norfolk Vanguard and HP3 also concluded in their own ES's that project level or cumulative noise, air quality, human health, socio-economics impacts to the local community would not be significant.

It is clear from the HP3, Vanguard and Boreas project and cumulative impact assessments that there is a common conclusion that project and cumulative impacts on local communities following mitigation are non-significant.

The Applicant goes on to state ...

A community by community assessment was not deemed proportionate, borne out through comprehensive and ongoing consultation with the relevant statutory public health bodies.

OPC wish to point out that, in all of the three wind farm project examinations so far, there has had to be extra requests for assessments at Oulton, especially at The Old Railway Gatehouse. The

early ESs were only assessed at selected points on the B1149: it was the ExA's requests for further information that have prompted clarification notes in all of these cases. Specific data were not put forward, but had to be requested. It is also noted that Norfolk Boreas still has unresolved issues, even at this stage of an extended examination process.

Regarding the Applicant's statement that their cumulative impact assessment was carried out "where sufficient information was available": in the case of Norfolk Boreas that has been information from HP3 and Norfolk Vanguard. OPC has attended all three examinations and it has noted that the information available has evolved during each examination and the Applicants have often failed to provide full details by the close of their examination. OPC are not aware of any other circumstances in the UK where three projects will cross each other, or where such huge traffic impacts will be generated from three national infrastructure projects.

The assessment process seems to be limited to the cable route only - an approach which then excludes consideration of the impacts to the wider area. No serious consideration is given to traffic travelling along routes from ports, or the delivery of materials associated with construction, but not close to the cable routes. Traffic will have to access a wide area of Norfolk's road networks; with three projects potentially coming onshore North and East, then travelling South and West, the whole of Norfolk as a county will be impacted.

OPC remain very concerned that there are still communities in Norfolk that have no awareness of these projects or have realized their potential impacts too late. One reason for this has been highlighted by the recent consultation for the Sheringham & Dudgeon Extension Project, where consultation leaflets were not delivered to every household in some communities. This is because the developers are adopting a very selective approach, only consulting those within the cable route search areas. As a result, OPC and NNDC have requested extra leafleting to a wider area, which has now been carried out.

It is also noted that traffic impacts do not form part of the consultation process until the PEIRs are published. Then, at phase two consultations, there is still only limited information. Therefore there is often considerable ignorance on the part of communities as to the real impact of these projects - especially if (as often happens) they only attend the phase 1 consultation.

3. Community Liaison

ExA Q5.4.0.8

Community Liaison

The ExA is not clear whether the Community Liaison Officer, Agricultural Liaison Officer and Traffic Management Plan Coordinator are to be a shared resource with the Norfolk Vanguard OFW project and Hornsea Project Three if it were consented.

- a) *Explain the relationship of each post to all three projects.*
- b) *What measures are proposed to provide a single point of contact for community liaison in the event of concurrent construction periods if the Proposed Development and Hornsea Three OFW were to both be consented and have concurrent construction periods.*

Applicant's response.....

a) It is most likely that under Scenario 1, the Community Liaison Officer, Agricultural Liaison Officer and Traffic Management Plan Coordinator are to be a shared resource with the Norfolk Vanguard OFW project, should both Vattenfall projects proceed to construction.

These roles would not be a shared resource with HP3. Under both Scenario 1 and Scenario 2, HP3 and its representatives are a stakeholder, and each of the roles outlined above would equally ensure that HP3 is aware of the Applicant's programmed activities,

and that relevant views and activities of HP3, are considered during planning and implementation of the Applicant's schedule of works, including communication and engagement.

OPC welcomes the use of a community liaison officer, but notes that the Applicant does not appear to be prepared to share a role with HP3. This will be problematic at Oulton where shared access routes, over a long period, will require coordination with other projects and activities in the area, especially during harvest periods (6 months of any year) and Blickling events. Each individual project simply informing the other of their construction activities as they unfold will be totally inadequate - they will have to liaise actively with each other to avoid dysfunction and gridlock.

OPC would also like there to be a commitment to dedicated vehicle identifications for each project, thus helping the community to know whose vehicles are operating when and where, if there are issues of compliance.

4. The Old Railway Gatehouse

ExA Q5.14.2.1 The Old Railway Gatehouse.

Confirm the steps that have been made to seek approval from the residents of Old Railway Gatehouse for the proposed additional mitigation [REP10-016]?

Applicant's response....

*As noted in REP11-007, the Applicant spoke with the residents of Old Railway Gatehouse on the 7th May 2020 and a summary of the call was sent to the residents on the 8th May 2020 as a record of that discussion. The Applicant acknowledged the views of the residents in relation to the project, **and a key outcome of the discussion was that the Applicant agreed to consider extending the physical alterations to include the northern side of the property(our emphasis)** and acoustic glazing of all windows, including the skylight windows. The Applicant committed to continue to engage with the residents to reach a mutually acceptable form of enhanced measures.*

The Applicant provided further clarification on the effect that the proposed measures would have in terms of noise reduction experienced by the residents of the Old Railway Gatehouse on the 8th July 2020. On the 31st July 2020, the Applicant visited the Old Railway Gatehouse to discuss the proposed measures in further detail.

Following this visit the Applicant proposed that the measures discussed were included in a revised version of the OTMP. The Applicant met with the residents of Old Railway Gatehouse on the 18th August 2020 and has agreed this approach. The measures agreed are:

- *Acoustic glazing throughout all windows on the property*
- *2m acoustic barrier to the east and south of the property.*
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In addition, the Applicant has engaged with Hornsea Project Three to explain the measures proposed and to request that Hornsea Project Three also commit to these measures, such that the residents can be assured, that whatever the order of construction of the projects the agreed measures will be implemented at the property. The updated Norfolk Boreas OTMP with the agreed proposals has been submitted at Deadline 14.

OPC, although relieved that the Applicant has finally engaged with the residents of The Old Railway Gatehouse, note that they have *not* committed to providing an acoustic barrier to the Northern side of the property. It is surely irrational to expect that traffic proceeding north-south past the eastern boundary of this property will not generate exactly as much noise, vibration and emissions at the *northern* end as at the southern. OPC hopes that, whether the residents have

been forced to agree to this reduced mitigation or not, the ExA will exercise its right to ask the Applicant to explain *exactly why* it has not offered a fuller acoustic barrier protection to this property, and then encourage the Applicant to change its mind and do the right thing.

OPC also wish to note that the very fact of the need for these measures is an indication of the severe impacts faced by the residents of this property.

5. The Outline Traffic Management Plan

Finally, in the Applicant's Outline Traffic Management Plan (OTMP) Version 6, submitted at D14, Point 136 states:

"In addition to the above, Norfolk Boreas Limited has committed to not routing HGV construction traffic along Oulton Street north of the junction between the Street and Heydon Road."

This commitment, welcome as it is, represents *only half* of the commitment that was offered to the OPC Working Party when it met several times with the Applicant.

The *full* commitment was not only to exclude all HGV construction traffic from the northern end of Oulton Street, but also **to exclude all project traffic of any type e.g. vans, sub-contractors, private staff vehicles etc.** It is vital that this fuller commitment be secured within an updated OTMP, as otherwise the residents of Oulton Street, with houses directly abutting the road, will be woken up every morning from 6 am by staff vehicles arriving to start their day, for the entire duration of the project. It should be clearly stated that ALL project traffic of any type must approach MA7 and the Cable Logistics Area from the B1149 (Holt Road).
