

NORFOLK BOREAS

Oulton Parish Council's submission at Deadline 16

Oulton Parish Council (OPC) would like to make the following observations and comments at D16 and request clarification on outstanding issues.

1. Cumulative effects of cable drum deliveries through Cawston

The Parish Council notes the submission by Orsted at deadline 14 of the document "Response to Norfolk Boreas Deadline 14 Submission - Technical Note" (REP14-043).

Although the document above relates to the Cawston HIS and the functionality of HP3 abnormal loads cumulatively with traffic associated with Norfolk Vanguard/Boreas, Oulton PC would like to highlight some of the issues of traffic flows associated with cable drum deliveries which came to light as part of Orsted's examination for Hornsea Project 3 (HP3). OPC's intention in submitting this information is to share with the Boreas ExA what we have learned during the examination of HP3 in regard to the density and inflexibility of Orsted's cable drum deliveries, and the highway disruption that they will cause – ***as many of these features will be replicated in Cawston.***

At **Table 1** below is a screenshot of a scenario of an abnormal load travelling 1km southwards along Oulton Street towards the B1149 (Holt Road), for delivery to Orsted's cable corridor. This screenshot was submitted to the Boreas examination as part of OPC's deadline 1 response (REP1-054).

OPC watched this scenario on a VISSIM traffic modelling video, generated entirely by Orsted. The video was not submitted or played as part of the HP3 examination, but was offered to OPC during a joint meeting with Orsted and NCC. However, amongst many other scenarios, the video demonstrates an abnormal load (cable drum) proceeding along The Street under escort.

OPC observed that:

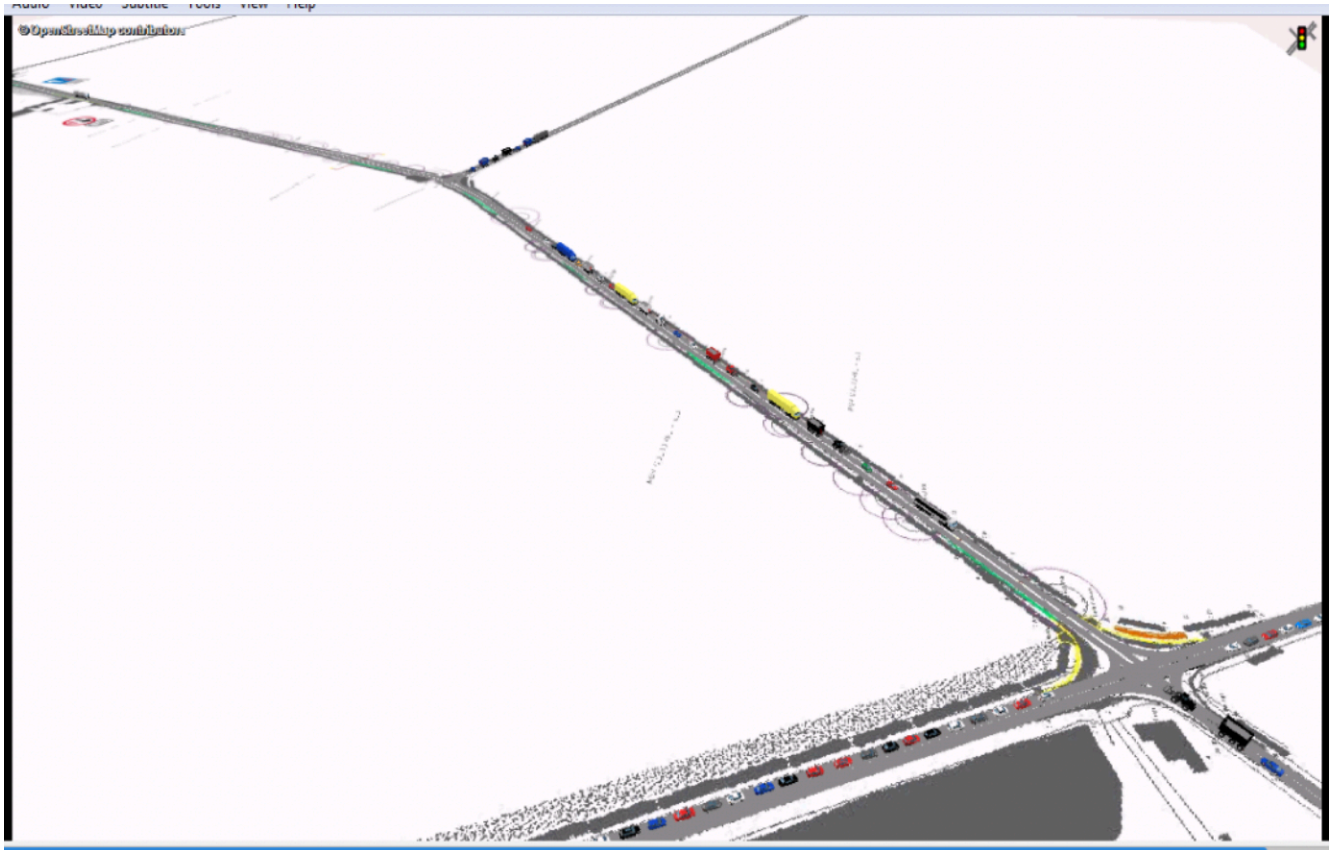
1. The traffic on the B1149 was halted (traffic control) *in both directions* while the abnormal load proceeded towards the B1149.
2. Traffic during this procedure was also not allowed to travel north along 'The Street' and traffic travelling south followed behind the abnormal load.
3. The data inputs for the model were sourced from traffic numbers as submitted by Orsted and were indicative of potential traffic patterns, including existing traffic, HP3 and Vanguard movements.
4. The delay time as observed by OPC was 5 mins 42 seconds on the B1149 in **both** directions. OPC also observed that 43 cars & 1 tractor/trailer were held up from the Saxthorpe direction, and 37 cars & 3 HGVs *from the humpbacked bridge direction* on the B1149.

Quite apart from the delays and dangers at *Oulton*, this sort of scenario will be replicated in *Cawston*, whenever abnormal loads travel through the village. This will be true of Orsted's traffic, whether Boreas generates abnormal loads or not. The cable drum width proposed by Orsted has now been reduced to 3.3m, but *this is still wider than the width of a low loader* and therefore will still require a similar stopping of traffic. Given the narrow nature of the historic Cawston High

Street, the bends in the road, and the negotiating of the two bridges along the B1145, this will require traffic to be stopped over a very significant distance to allow for the cable drum transporters to negotiate the village safely. *The cumulative impact of Orsted's major disruption to traffic flows through Cawston will have to be given major consideration.*

At **Table 2** below, OPC have provided an indicative timetable of cable drum deliveries (REP1-054) which will arrive and depart from HP3's Main Construction Compound at Oulton. This table was produced by OPC but was not challenged by Orsted. The sheer density of this pattern of deliveries is breathtaking, but is inevitable because of Orsted's insistence on a 30-month construction window. All 1,121 cable drums (**2,242 in & out**) would have to fit into that 30-month period. [OPC understands that the 30-month construction period has the potential to be in two phases, and there may be a period of inactivity between phases.]

Table 1



(Screen print) Abnormal load leaving Orsted Hornsea Three's Main Construction Compound travelling southwards along Oulton Street to B1149. NOTE: - Traffic held on B1149 in both directions for nearly 6 minutes, with significant highway safety implications [bottom of screen print]. Traffic tailing back in an easterly direction towards a hump back bridge [offscreen] which will prevent this stationary traffic being seen by approaching fast-moving traffic.

See **Table 2** below:

TABLE SHOWS				
1,121 Cable drums are needed for the project.				
36 cable drums arrive at a port and are delivered to the Main Construction Compound.				
The 36 cable drums are delivered TO the Main Construction Compound at a rate of 8-12 a day over 3-5 days				
The cable drums are then delivered to the cable route FROM the main compound over three week before the next shipment arrives				
This is a 4 week scenario to fit 1,121 cable drum delivery into the 30 month active construction period.				
week 1	week 2	week 3	week 4	week 5
36 cable drums IN	12 c/drums OUT	12 c/drums OUT	12 c/drums OUT	36 cable drums IN
week 6	week 7	week 8	week 9	week 10
12 c/drums OUT	12 c/drums OUT	12 c/drums OUT	36 cable drums IN	12 c/drums OUT
week 11	week 12	week 13	week 14	week 15
12 c/drums OUT	12 c/drums OUT	36 cable drums	12 c/drums OUT	12 c/drums OUT
week 16	week 17	week 18	week 19	week 20
12 c/drums OUT	36 cable drums IN	12 c/drums OUT	12 c/drums OUT	12 c/drums OUT
week 21	week 22	week 23	week 24	week 25
36 cable drums IN	12 c/drums OUT	12 c/drums OUT	12 c/drums OUT	36 cable drums
week 26	week 27	week 28	week 29	week 30
12 c/drums OUT	12 c/drums OUT	12 c/drums OUT	36 cable drums IN	12 c/drums OUT
week 31	week 32	week 33	week 34	week 35
12 c/drums OUT	12 c/drums OUT	36 cable drums IN	12 c/drums OUT	12 c/drums OUT
week 36	week 37	week 38	week 39	week 40
12 c/drums OUT	36 cable drums IN	12 c/drums OUT	12 c/drums OUT	12 c/drums OUT
week 41	week 42	week 43	week 44	week 45
36 cable drums IN	12 c/drums OUT	12 c/drums OUT	12 c/drums OUT	36 cable drums IN
week 46	week 47	week 48	week 49	week 50
12 c/drums OUT	12 c/drums OUT	12 c/drums OUT	36 cable drums	12 c/drums OUT
week 51	week 52 (1yr)	week 53	week 54	week 55
12 c/drums OUT	12 c/drums OUT	36 cable drums IN	12 c/drums OUT	12 c/drums OUT
week 56	week 57	week 58	week 59	week 60
12 c/drums OUT	36 cable drums IN	12 c/drums OUT	12 c/drums OUT	12 c/drums OUT
week 61	week 62	week 63	week 64	week 65
36 cable drum IN	12 c/drums OUT	12 c/drums OUT	12 c/drums OUT	36 cable drums IN
week 66	week 67	week 68	week 69	week 70
12 c/drums OUT	12 c/drums OUT	12 c/drums OUT	36 cable drums IN	12 c/drums OUT
week 71	week 72	week 73	week 74	week 75
12 c/drums OUT	12 c/drums OUT	36 cable drums IN	12 c/drums OUT	12 c/drums OUT
week 76	week 77	week 78	week 79	week 80
12 c/drums OUT	36 cable drums IN	12 c/drums OUT	12 c/drums OUT	12 c/drums OUT
week 81	week 82	week 83	week 84	week 85
36 cable drums IN	12 c/drums OUT	12 c/drums OUT	12 c/drums OUT	36 cable drums
week 86	week 87	week 88	week 89	week 90
12 c/drums OUT	12 c/drums OUT	12 c/drums OUT	36 cable drums IN	12 c/drums OUT
week 91	week 92	week 93	week 94	week 95
12 c/drums OUT	12 c/drums OUT	36 cable drums	12 c/drums OUT	12 c/drums OUT
week 96	week 97	week 98	week 99	week100
12 c/drums OUT	36 cable drums IN	12 c/drums OUT	12 c/drums OUT	12 c/drums OUT
week 101	week 102	week 103	week 104/2nd Yr	week 105
36 cable drums IN	12 c/drums OUT	12 c/drums OUT	12 c/drums OUT	36 cable drums IN
week 106	week 107	week 108	week 109	week 110
12 c/drums OUT	12 c/drums OUT	12 c/drums OUT	36 cable drums IN	12 c/drums OUT
week 111	week 112	week113	week 114	week 115
12 c/drums OUT	12 c/drums OUT	36 cable drums IN	12 c/drums OUT	12 c/drums OUT
week 116	week 117	week 118	week119	week120
12 c/drums OUT	36 cable drums IN	12 c/drums OUT	12 c/drums OUT	12 c/drums OUT
week 121	week 122	week 123	week 124	week 125
36 cable drums IN	12 c/drums OUT	12 c/drums OUT	12 c/drums OUT	36 cable drums IN
week 126	week 127	week 128	week 129	week 130/6mth
12 c/drums OUT	12 c/drums OUT	12 c/drums OUT	//////////	30 MONTHS

On January 4th 2019, at Deadline 4 for the HP3 examination, OPC made the following comment:

*“At our meeting with NCC, we were surprised to learn that the Applicant had that morning submitted to them an entirely new suggestion viz: a reduction in the size and therefore the width of the cable drums, from 4.4m to 3.5m. **With reduced drum size comes less cable.** We pointed out that this would inevitably entail, given that the length of the cable corridor remains constant, **an increase in the number of cable drums requiring delivery to Oulton.** This was agreed, and NCC will be requesting therefore new figures from Orsted, on the increased number of low-loader deliveries that will now be needed.”*

OPC’s observation that a reduction in cable size would necessitate *an increase in number of deliveries* is borne out in the recent submission by Orsted to the Boreas ExA (REP14-043), in the tables which show numbers of deliveries for 3.3m and 2.75m cable drums:

3.3m Cable drums...

Construction Vehicle Movements by Cable Route Section	Section 8	Section 9	Section 10	Total (9+10)
Cable and ducting deliveries				
m of Cable	78,660	34,830	29,880	64,710
Number of cable drums - m/cable roll	127	56	49	105
HGV loads	127	56	49	105
m of ducting	78,660	34,830	29,880	64,710
Number of duct loads	105	47	40	87
2-way HGV moves	464	206	178	384

2.75m cable drums...

Construction Vehicle Movements by Cable Route Section	Section 8	Section 9	Section 10	Total (9+10)
Cable and ducting deliveries				
m of Cable	78,660	34,830	29,880	64,710
Number of cable drums - m/cable roll	161	72	62	134
HGV loads	161	72	62	134
m of ducting	78,660	34,830	29,880	64,710
Number of duct loads	105	47	40	87
2-way HGV moves	532	238	204	442

These numbers of low-loader deliveries cannot, by any stretch of the imagination, or the wishful thinking of an Applicant, be discounted as negligible. And neither are they feasible or acceptable.

At the risk of repetition, Oulton PC would like to observe that the nexus of Oulton and Cawston – being so close to the crossover of the cables from all projects and hosting several major construction compounds - will be *massively* impacted by the cumulative traffic generated by the construction of all 3 major projects, *for years and years.*

NCC has tried its best to mitigate the traffic impacts at Oulton, and has now decided, reluctantly, to agree with the Applicants that the HIS for Oulton is probably ‘feasible’.

Oulton PC would like to register again, at this late stage, that much of the baseline data used to reach this conclusion is flawed, and that we strenuously disagree with NCC’s position.

Meanwhile, throughout the public examinations of *three successive major projects* – HP3, Norfolk Vanguard and Norfolk Boreas – NCC Highways has worked hard, in active consultation with all three Applicants, to try to sign off an HIS for Cawston that would be acceptable, functional and safe. Here, at this eleventh hour in the examination of the last of these three projects, such a resolution has still not been achieved. ***The traffic implications for Cawston High Street remain an unresolved and still intractable problem.***

However, NCC has decided to adopt the position that, although no workable solution has yet been found, they believe that, in theory, a solution is “possible”.

OPC urges the ExA to request of NCC Highways that they *share the evidence* on which they are basing this statement. If the problems of Cawston High Street have been intractable for the duration of three NSIP Examinations - then what exactly do they expect will change?

Oulton PC fears that the only thing that will change is that, once consent is granted, then the construction imperatives of these projects will *force* NCC Highways to accept a far from acceptable “solution”.

2. The Sheringham and Dudgeon Extension Project consultation process

It has come to OPC’s attention that Vattenfall have made comments on the Sheringham & Dudgeon Extension project (SEP/DEP) as part of Equinor’s public consultation.

Although Vattenfall have stated that they would not comment on the SEP/DEP project as part of the Boreas Examination due to “limited information”, the current status of public information relating to the SEP/DEP project *would fall within the scope of PINS Advice Note 17.*

OPC believes that the ExA should be made aware of what is a public comment and of relevance to the Boreas Examination, as the Applicant themselves are highlighting here serious issues of the potential cumulative impacts and construction conflicts generated by both projects operating within the same area.

The main portion of the text of their consultation response to Equinor is quoted below:

“Vattenfall has reviewed the Dudgeon and Sheringham Shoal Offshore Wind Farm Extension Projects (DEP/SEP) Extension to Scoping Area document (dated 2 July 2020) and has the following comments / observations.

“... The original DEP/SEP scoping corridor over-lapped with a 1km stretch of the Norfolk Vanguard and Norfolk Boreas onshore cable route, and the proposed extension to the SEP/DEP scoping area increases this area of overlap to approximately 1.5km.

...The extended scoping area now overlaps with a construction access required by Norfolk Vanguard and Norfolk Boreas. This access is required to undertake a trenchless crossing of the B1149 in the event that Hornsea Project Three also progresses, and represents the only means of access to the east of the B1149 to undertake this trenchless crossing outside of the wider duct installation programme. This access is also required for cable pulling operations for both Norfolk Vanguard and Norfolk Boreas post duct installation. We would therefore want assurances that any proposed routing of the DEP/SEP cables would not impact our construction programmes for either Norfolk Vanguard or Norfolk Boreas; both at this construction access and across the onshore cable route.

The proposed DEP/SEP onshore cable route crosses the Norfolk Vanguard and Norfolk Boreas onshore cable route approximately 1km to the north-east of Cawston. The main distributor roads in this area are the B1145 and B1149. The extension to the DEP/SEP scoping area suggests a potential crossing of the B1149 (by DEP/SEP) closer to B1145/B1149 junction. Equinor should be mindful of construction traffic commitments made by Norfolk Vanguard and Norfolk Boreas along both

the B1149 and B1145, as well as cumulatively with Hornsea Project Three, when they are developing their plans in this location. **With this in mind Equinor should ensure that Norfolk Vanguard and Norfolk Boreas are appropriately considered within the DEP/SEP cumulative impact assessments [our emphasis] and, should any additional cumulative impacts be identified, mitigation would need to be pro-posed and secured by Equinor.**

Vattenfall would also encourage Equinor to discuss protective provisions for the benefit of the Norfolk Vanguard and Norfolk Boreas projects to ensure that these are appropriately captured within their draft DCO...”

Here we see the Applicant assiduously promoting and protecting their own future interests, while denying elsewhere that there is any merit in considering the cumulative impacts on communities, of a future project **which might well be developed during the same timescale as their own.**

If Advice Note 17 does not properly allow the ExA to consider the cumulative impacts of the SEP/DEP projects, which will be constructed contemporaneously with Vanguard/Boreas, then this only serves to underline the crippling deficiencies of the current NSIP process.

As stated by several Interested Parties during this and the other Examinations, it is understood by everyone now that this urgent transition away from fossil fuels towards renewable energy is a *national* transition, and on an unprecedented scale. And yet the remit of the NSIP process is – inappropriately – that it cannot treat these separate applications in the round, and cannot fully consider the cumulative impacts of all the projects – both simultaneous and sequential – taken together.

OPC fervently hopes that the ExA will comment on the damaging and unreasonable consequences of this deficiency, in its Report to the Secretary of State.

3. The Applicant's late response to OPC at deadline 15

3(i) Use of the Cable Logistics Area

On 9th September 2020, the Applicant responded to a query from OPC relating to the exact use of the Cable Logistics Area (CLA) in the following terms:

“The Applicant would like to clarify that when referring to ‘works which affect communities in Broadland District are associated with the onshore cable route construction’ this included all works along the onshore cable route not just the cable installation activity and as such includes the use of the HP3 MCC and the CLA.

‘To clarify, the CLA for Norfolk Boreas/ Norfolk Vanguard will only be in use during the cable pulling works (up to 2 years per project) [our emphasis], and the time period for these works has been included in the worst case elapsed time presented in the response to ExA Q5.4.0.3 [REP14-036].

Oulton Parish Council took note of this clarification, and derived a little comfort from the certainty expressed in the sentence by the Applicant above, namely that the CLA would **“only be in use during the cable pulling works”** – even though this represents a period of up to 4 years.

OPC was therefore both surprised and concerned to receive the email below *only 5 days later* – on 14th September – from Vattenfall referring to imminent site investigations all along the cable route and informing OPC that the Cable Logistics Area will be in use shortly as a **‘central works compound’** during these works.

From: <susan.falch-lovesey@vattenfall.com>

Date: Mon, 14 Sep 2020 at 19:41

Subject: OULTON Parish Council Update from Vattenfall

To: <oultonpc@gmail.com>, <Cllr.Greg.Peck@broadland.gov.uk>

Dear Lloyd

I hope this finds you well, I wanted to make contact ahead of your forthcoming Parish Council meeting next week as you may notice some additional activity for a short while associated with our advanced studies. These will feed into detailed design - the next phase of project development, post consent.

As you will be aware, much early work, including aerial photography, non-penetrative geophysics, an initial campaign of drill sampling to ground truth existing and new data commissioned by us, and all the feedback from stakeholders including local residents has already fed-into refining our understanding and determining the most appropriate and sensitive local for infrastructure installation.

This next round of works is a further progression of that, adding even greater detail to our design process and involves additional "ground truthing"/checking up with real samples, what our extensive data-set is telling us. The works are ongoing offshore as well as starting onshore too. Onshore, the site investigations will begin in the vicinity of the onshore project substation, then move to landfall, then progress along the onshore cable corridor. For these works, which will continue for appropriately 8 weeks, **we require a location for a welfare facility and a temporary storage container. It has been agreed with the relevant landowner that we will use the future Cable Logistics Area near Oulton for the purposes of a central works compound** [*our emphasis*] relating to the onshore SI campaign. For clarity, this is at The Hanger, off Heydon Road, Oulton NR11 6QZ – and shown in the attachment....

Please do be in contact if you have further questions.

Kind Regards

Sue

This email would appear to directly contradict the so-called "clarification" received from Vattenfall on 9th September at D15, that the Cable Logistics Area "**will only be in use during the cable pulling works**".

At this very late stage in the Examination, Oulton Parish Council is left once more confused and alarmed about the real use of the CLA by both the Vanguard and Boreas projects.

We are especially alarmed to read of the Cable Logistics Area (CLA) being referred to in this way, as a "central works compound", *supporting work along the whole length of the cable corridor*, right at the outset of the Applicant's sister project - even before construction has started. This only serves to confirm our longstanding anxiety that the "Cable Logistics Area" is in fact a Main Construction Compound hiding behind another, more innocuous-sounding, name.

We have no recollection of this pre-construction, "central works compound" use of the Hangar site being mentioned during the Norfolk Vanguard Examination and similarly no such reference, until now, during the Boreas Examination. Certainly no such use is referred to in the document submitted by the Applicant at Deadline 2: "Clarification Note – Cable Logistics Area" [REP2-027]. This document *has no other purpose* except to describe and explain, fully and transparently, for the benefit of the ExA as well as of Oulton parish, the precise nature and use of the Hangar site.

In fact, whenever we have expressed our concerns, we have been 'reassured' by the Applicant that the CLA site would only be used at the cable-pulling phase.

This 'reassurance' would now appear to be at best misleading and at worst false. The Parish Council cannot help but feel that, in these very closing stages of their two NSIP examinations, this Applicant is *still* not being transparent with us.

In addition, we are now concerned that this type of “general” use of the site might be unregulated, and **we therefore request, as a matter of urgency, that the Applicant should draw our attention to where exactly this use of the site is described and secured in the DCOs for both Norfolk Vanguard and Norfolk Boreas.** *We request that we are not only provided with a list of the numbers of the documents where these references might appear, but are also provided with the full relevant extracts from the text.*

We currently believe that this use of the site as a “central works compound” may fall outwith the safeguards secured within the DCO, and we therefore have immediate concerns about the Hangar site, during these pre-construction works, as follows:

- 1) What will be the hours of operation of the site?
- 2) Will Vattenfall direct **all** site traffic, large or small, to **only** access the site via the B1149 Holt Road and never come through the northern end of Oulton Street?
- 3) How will this be monitored and enforced?
- 4) How will individual project vehicles be identified and will this identifier be communicated to the Parish Council, so that residents can be informed?
- 5) What are the **dates** for when this site investigation work is due to start and finish?
- 6) Has the Applicant appointed a Community Liaison Officer and, if so, can OPC be informed of a contact number?
- 7) Will Vattenfall communicate all relevant information about this new situation *directly* to the residents of The Old Railway Gatehouse?
- 8) What is the **next use** of this site that Vattenfall has in mind?

In the email from Vattenfall above, dated 14th September, we now note with concern the use of the phrase:

“It has been agreed *with the relevant landowner* that we will use the future Cable Logistics Area near Oulton for the purposes of a central works compound...”

Reflecting on this otherwise harmless sentence, the Council has become concerned about whether this perhaps reveals a special status relating to the use of land *leased* by these projects from private landowners, *as opposed to land that has been compulsorily acquired.*

OPC now urgently seeks clarification from both the ExA and the Applicant as to whether such leasing arrangements are viewed by the planning process as private, in such a way that activities on these sites might be unregulated and uncontrolled by any of the safeguards within the relevant DCOs.

3(ii) The Old Railway Gatehouse

OPC welcomes the continuing commitment to keep dialogue open with regard to the mitigations proposed for this property but notes that Vattenfall are still excluding acoustic barriers to the North of the property, as they consider this to be only relevant to *Orsted's* entrance to their Main Construction Compound.

OPC disagrees with the Applicant's position on this matter and still maintains that cumulative traffic noise from *all* of the projects will be audible from the northern end (junction with The Street, Main Entrance to HP3 compound and Heydon Rd) due to HGVs *from all projects* waiting to proceed along the southern end of The Street. Moreover it is also undeniable that, since *all* Vattenfall's traffic, as it has to proceed in a (roughly) north/south orientation past the property, will be bound to impact – at least on the roadside boundary – *as much to the north of the property as to the south.*

OPC believes it to be ungenerous in the extreme for this Applicant not to provide an acoustic barrier on the roadside to the north, and then continue this for at least several metres along the northern boundary leading away from the road. This would not be excessive, and would only mirror the mitigation they have already agreed to provide on the southern boundaries of the property.

3(iii) Outline Traffic Management Plan

OPC welcomes the new inclusion of the traffic routing commitment in the Norfolk Boreas OTMP paragraph 136:

“To clarify, the OPC Working Party referred to, was a meeting attended by representatives from Norfolk Vanguard in February 2019. The Applicant understands that Norfolk Vanguard did subsequently make a commit in response to the ExA further written questions [NV REP4-040] Q11.39 that ‘No construction traffic associated with Norfolk Vanguard will be routed along Oulton Street (residential area north of the junction between The Street and Heydon Road).’ Therefore, the Applicant is prepared to make the same commitment and the OTMP paragraph 136 has been updated to the following;

‘In addition to the above, Norfolk Boreas Limited has committed to not routing HGVs or any construction traffic along Oulton Street north of the junction between the Street and Heydon Road.’ An updated OTMP will be submitted at Deadline 18.”

However, while we are relieved that this commitment is now being carried over from the Vanguard examination into the updated version of the OTMP for Boreas, the Parish Council notes that this has only occurred *because of our specific request*, when this should have been automatic.

OPC therefore requests immediate clarification from the Applicant as to whether *all* the safeguards and commitments agreed by Norfolk Vanguard in relation to their proposed activities in Oulton have been carried over and secured in the DCO for Norfolk Boreas.

It should not be the responsibility of small parish councils to have to work so hard to ensure that these reasonable safeguards are not conveniently ‘lost’ from one sister project to the next.
