Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects

The Applicant's comments on Oulton Parish Council's Deadline 5 Submission

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Title: **Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects Examination submission** **The Applicant's comments on Oulton Parish Council's Deadline 5 Submission**		
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1. This document presents the Applicant's response to Oulton Parish Council's Deadline 5 Submission [REP5-077].

Table 1 The Applicant's comments on Oulton Parish Council's Deadline 5 Submission

ID	Stakeholder Comment	Applicant Response
Oulton Parish Council (OPC) response at Deadline 5		
1	OPC note the Applicant's response to the ExA's Written Questions 2, and the Applicant's Deadline 4 responses. OPC also note the ExA's Written Questions 3. However, OPC feel that there are still some outstanding issues which need to be addressed. OPC note in particular the following in reference to HDD and night time work at Oulton, along with issues concerning managing the access from the B1149 to ACC25 and ACC25B.	Please refer to the Applicant's responses below.
ACC25/ACC25B		
2	OPC have read with interest the Applicant's explanation as to how these two accesses will operate and the following is OPC's observations on the information to date. It should be remembered at all times that the B1149 (the Holt Road), although classified as a "B" road, is readily acknowledged by NCC Highways as **a major distributor route for traffic** – including tourist traffic – travelling from Norwich to the North Norfolk coast and is in effect a B road forced to act as an A road. It is much narrower than the A140, for instance, and yet traffic routinely travels very fast along it, especially on the straight stretch from the Cawston roundabout to the entry to Corpusty. Both ACC25 and ACC25b are proposed to be situated on exactly this stretch of road.	Please refer to the Applicant's responses below.
3	**Re: *Q.2.23.5.5.*** The Applicant has answered the question which relates to ACC25B to Bluestone Cottage and access to the property. OPC have queries which relate to the proposed use of traffic signals for	It is anticipated that ACC25 will be utilised for a period of 6 months by construction traffic and ACC25b will be utilised for a period of 2 months by construction traffic. There will be a short duration (up to two months) where the accesses will be utilised at the same time. The applicant has agreed a traffic management strategy for ACC25 and ACC25b with Norfolk County Council to minimise disruption for highway

ID	Stakeholder Comment	Applicant Response
	ACC25 temporary compound and ACC25B cable route and HDD works. OPC note from the revised OCTMP (APP-301 revision C) submitted at Deadline 3, that there is mention of temporary traffic lights at ACC25B, along with plans (*pages 50-52*) for the traffic signalling and swept path information at this location. However, there are also plans for traffic lights at ACC25 (*pages 53-55*) which gives access to the temporary compound from B1149. The Applicant has not indicated whether ACC25 will be in operation at the same time as ACC25B. OPC would seek clarification on how the two sets of traffic lights will interact and how long the temporary compound will be needed for, and whether ACC25 traffic lights have the same restrictions as ACC25B? OPC can find no reference to time frames for temporary compounds. It was OPC's understanding that both accesses would not be in use at the same time.	users. It entails simultaneous operation of traffic signals for a short duration, restricted operating hours and manual control for ACC25b. Full details of the agreed traffic management strategy are contained in the Applicant's Deadline 5 Submission, **Outline Construction Traffic Management Plan (Revision D) (Tracked)** [REP5-028], Section 4.4 and agreement confirmed in the **Draft Statement of Common Ground with Norfolk County Council (Revision D)** [REP5-033], Section 2.3, ID 24.
Extract from the OCTMP (APP-301 revision C):		
4	**4.4 Accesses and Road Crossings** 68. A suite of outline access and road crossing concept designs have been developed for SEP and DEP and are detailed within **Annex B Outline Access Designs**. 69. It has been agreed with NCC and National Highways that these outline access and crossing concepts can be refined post consent, to be included in the final CTMP. 70. Following the submission of the DCO application, additional controls have been also agreed with NCC for access ACC25b. These measures include: • Limiting the duration of use of access ACC25b; • Ensuring the temporary traffic signals at ACC25b do not operate between the hours of 07:30 to 09:00 and 16:30 to 17:30; and	Please refer to the Applicant's response to ID3 and to Q3.23.5.2 in **The Applicant's response to the Examining Authority's Third Written Questions** [REP5-049].

ID	Stakeholder Comment	Applicant Response
	• No SEP and/or DEP traffic movements should travel to access ACC25b between 07:30 to 09:00 and 16:30 to 17:30. OPC have recently emailed NCC Highways to seek clarification on their understanding as to how the two accesses ACC25/ACC25b will operate: in particular whether they will be in operation at the same time. NCC has answered that it initially had concerns that traffic lights could not operate together, if they were within 200m of each other. The distance between the traffic lights has now been established as 800m apart and these accesses will be required to operate simultaneously, to enable efficient construction of the cable route.	
5	It is OPC's understanding that ACC25 will be in operation for 6 months and ACC25b will be in operation for two months, with both accesses in operation simultaneously for approximately 2 months.	
6	OPC are unaware of this having been explained in the OCTMP. The Applicant will therefore need to explain the operational design for ACC25(temporary compound) with ACC25b (cable route/HDD), along with any cumulative impacts of traffic lights near to the junction of the B1149 with The Street and Link 131 (SEP/DEP), Link 68 (Vanguard/Boreas) Link 208 (Hornsea Three Main Construction Compound).	
7	Will traffic held at the traffic lights along the B1149 cause any tailback that might result in a blockage to the junction of the B1149 with The Street (Links 131/68/208 referred to above)?	
8	This could result in backups for traffic entering and exiting the junction or cause backups further along the B1149 at Cawston roundabout or Saxthorpe roundabout, especially in light of the huge increase in HGVs along this section of road, caused by the NSIPs, together with seasonal agricultural vehicles, and tourist traffic.	

<table>
<tr><th>ID</th><th>Stakeholder Comment</th><th>Applicant Response</th></tr>
<tr><td>9</td><td>In conclusion, Oulton PC note and endorse the ExA’s written question 3 below:<table><tr><td>Q3.23. 5.2</td><td>Applicant
Norfolk County Council</td><td>Accesses ACC25 and ACC25b

The most recent draft SOCG [REP4-021] with NCC notes that matters associated with access ACC25 and ACC25b and mitigation measures are still in discussion. Provide an update on these discussions.</td></tr></table></td><td></td></tr>
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Table 2 The Applicant's response to Oulton Parish Council's Comments on the Applicant's Second Written Question responses

PINS Question Number	Question	Applicant Response	Oulton Parish Council Comment	Applicant Response
ExA Q 2.20.2.3: HDD at Oulton:				
Q2.20.2.3	**HDD at Oulton:** "Further to discussions at ISH3 [EV-036] [EV-041], Applicant confirm, as a worst-case scenario, whether the use of HDD under the solar farm at Oulton would result in the need for night time works/drilling."	*A worst-case scenario could occur requiring night time working for the HDDs at the Solar Park. The triggers for requiring night time working would be the same as those indicated for* ***Q2.20.4.2 c) HDD Restrictions and Emergency Works*** *however mitigation measures such as the following could be used to minimise the likelihood that night-time working will be required.* • Commence works on each bore and each phase of reaming etc at the start of the shift with adequate planning to ensure that each phase of work is completed in a single shift. • Manage the programme to ensure that no bores are started with the potential to not be completed before the end of the working week.	OPC note that the Applicant has not ruled out the possibility of night-time working at **CCR16B** and/or **CCR16C**. The Applicant has given at **Q2.20.2.3** an answer which describes in some detail how they propose to minimize the likelihood of the occurrence of the scenarios that might trigger overnight drilling, but they have not chosen to specify at all the exact methods by which they intend to mitigate the adverse impacts of such working, once it has become necessary. This is a telling failure and OPC begs to suggest that it arises from the fact that effective mitigation is simply impossible to achieve. Seeking refuge in a blizzard of references as to how "The exact methodology will be set out within a Construction Method Statement which will form part of the Code of Construction Practice…" etc. etc. should not be accepted by the ExA	Adverse impacts from HDD working at night will be minimised using the mitigation methods identified in Section 10.1.1, and any further mitigation, if deemed necessary, identified in Section 10.1.2, of the **Outline Code of Construction Practice (Revision E)** [REP5-029] (**OCoCP**). For the reasons set out in response to Oulton Parish Council's comment on ExA Question Number Q2.20.4.1, the Applicant does not consider that any specific mitigation is required for night-time working beyond that set out in Section 10.1.1 and Section 10.1.2 of the **OCoCP (Revision E)**. Regarding Oulton Parish Council's point about dialogue with residents, the Applicant is committed to keeping local residents informed post-consent and having clear mechanism in place to facilitate dialogue in the construction phase. Section 2.4 of the **OCoCP (Revision E)** [REP5-029] states that "A designated Local

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		• Maintain discussions with Docking Solar Park and exchange designs and, where possible, reduce the length of the trenchless crossings ensuring that each activity can be completed in a normal shift. • Undertake crossings in flat formation, reducing risk and number of operations required for the installation of each duct. The exact methodology will be set out within a Construction Method Statement which will form part of the Code of Construction Practice, which will be based on the Outline Code of Construction Practice (Revision C) [document reference 9.17] submitted at Deadline 3. The Code of Construction Practice is secured under Requirement 19 of the draft DCO (Revision F) [document reference 3.1]. Similarly, the Construction Noise (and Vibration) Management Plan, which also will form part of the Code of Construction Practice will set out appropriate noise mitigation specific to the site.	as a sufficient substitute for detailed work on this issue **now**. In any case, OPC requests that, as well as discussing the minimizing of overnight activity with the developers of the solar farm (as the Applicant suggests above), there should also be dialogue with the residents, who will be directly impacted by this work at such extremely anti-social hours. The Applicant's response does not give full details of the impact at Oulton in their response to Q2.20.2.3. However, it is noted that at **Q 2.20.4 / Q 2.20.4.1** information is provided on the magnitude of the proposed HDD work and the potential for night-time work at this location. There is mention of 600m being the longest drill, and in the Applicant's crossing schedule (APP-179), 600m refers to the proposed solar farm at Oulton.	Community Liaison Officer will respond to any public concerns, queries or complaints in a professional and diligent manner as set out by a project community and public relations procedure which will be submitted for comment to the relevant planning authority."
Applicant's response to ExA Q 2.20.4.1 (OPC's emphasis):				

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Q 2.20.4.1		*"Emergency 24-hour drilling works would constitute the rescue of a drill head and completion of that drill profile; drilling would be at a rate of 80m per day.* ***The longest proposed drill is approximately 600m; hence, the absolute maximum duration of night-time emergency HDD works is 6.25 days,*** *unless multiple drills fail which is extremely unlikely. In any event, two drill failures (and the subsequent need for night-time working) would be separated by a period of daytime only working.* ***On that basis, night-time emergency HDD works is not anticipated to last for more than 10 days in any 15 consecutive days****. Therefore, in accordance with the criteria presented in Section 23.4.3.3 of* ***Chapter 23 Noise and Vibration*** *[APP-109],* ***the associated noise effects will be not significant."***	The statement above regarding noise effects being "not significant" is astonishing, given that it would almost certainly be impossible to sleep through continuous night-time HDD drilling, for the residents of Bluestone Cottage and The Old Railway Gatehouse. In addition, the reference to such an event being "not anticipated to last for more than 10 days in any 15 consecutive days' – if it is being put forward as acceptable mitigation – shows a shocking lack of imagination on the part of the Applicant. Furthermore, it would appear to directly contradict their own statement (see below) that there is a "High effect magnitude" at this location for night-time work (CCR 16B / CCR16C):	The high effect magnitude referenced by Oulton Parish Council is based on the calculated noise levels reported in **ES Volume 3 Appendix 23.3 Construction Noise Assessment** [APP-266] which included an assumption that the entry pit will be located as close as possible to Bluestone Cottage (CCR16B) and The Old Railway Gatehouse (CCR16C), on the edge of the redline boundary. The assumed distances from the HDD works to the properties were 61m to CCR16B and 80m to CCR16C. The Applicant submitted a potential design for the HDD under the Solar Park in **Appendix A – Supporting Figures for the Applicant's Responses to the Examining Authority's First Written Questions** [REP1-037], which shows that the predicted HDD locations will be further from the nearby properties than assumed in the calculations reported in the Environmental Statement. The minimum distance from the properties to the drilling works will depend on the direction which the drilling takes place. Updated calculated noise levels have been

PINS Question Number	Question	Applicant Response	Oulton Parish Council Comment	Applicant Response
				identified based on these revised distances, as follows: • Drilling east to west: CCR16B will be around 140m from the works, calculated construction noise levels are 55 dB L_{Aeq}, equating to an effect magnitude of high during night-time working, CCR16C will be around 450m away, calculated construction noise levels are 42 dB L_{Aeq} which is a negligible effect. • Drilling west to east: CCR16B will be around 725m away, calculated construction noise levels are 37 dB L_{Aeq} which is a negligible effect, CCR16C will be around 105m away, calculated construction noise levels are 58 dB L_{Aeq} which is a high effect during night-time working. The predicted construction noise effects are based on guidance in BS 5228-1, which is an accepted approach as industry best practice in the UK Acoustics industry. Based on the criteria in BS 5228-1 the effects of night-time noise are assessed as not significant.

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				For further context, BS5228-1 uses evidence taken from the WHO publication Night Noise Guidelines for Europe (NNG) for its night-time noise level criteria. The WHO NNG guidance sets thresholds in terms of outdoor annual average night-time noise levels to avoid potential health effects because sleep is being disturbed over a long period of time. Sleep disturbance is typically classified by the number and type of awakening events, noting that there are various kinds of awakening as follows: • Behavioural awakening - equivalent to the everyday understanding of conscious 'awakening', when the subject is usually aware of being conscious at the time and can often recall being 'awake' the next day; • Physiological awakening - defined by changes in sleep stages which the subject may not be aware of at the time or recall the next day; and

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				• The onset and degree of 'motility' i.e. body movements which the subject may not be aware of at the time or recall the next day. Hence, it is not correct to suggest that "it would almost certainly be impossible to get to sleep" if outdoor noise levels exceed 55dB L_{Aeq}, rather, that, over a long period of time, health-related effects may occur due to noise-associated awakenings. The adopted criterion is designed to avoid significant sleep disturbance effects without requiring residents to close their windows. The WHO guidance assumed windows were partially open and an outdoor to indoor noise level difference of 15dB; thereby implying an indoor noise level of 40dB L_{Aeq} for the onset of high effects and 35dB L_{Aeq} for medium effects. With windows closed, the outdoor to indoor noise level difference is 25 to 30dB L_{Aeq} i.e. 10 to 15 dB higher that with windows open. If the residents close their windows, the potential worst-case indoor noise levels from construction would be 25 to 30dB L_{Aeq} (CCR16B) and 28 to 32dB L_{Aeq} (CCR16C). These indoor

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				noise levels are at least 3dB below the threshold for the onset of medium effects..
Applicant's response to ExA Q2.20.4 (OPC's emphasis):				
10		*CCRs 2D, 16B, 16C, 17, 18, 24, 24B, 26B, 29 and 32 -* ***High effect magnitude during night-time working****, medium during evenings and weekends, effects due to works at other times are not significant.*	In light of the above information, it is clear that these properties are likely to be severely and unacceptably adversely impacted when or if night-time HDD work is carried out. Finally on this issue, OPC notes that there appears to be no consideration at all being given to the serious problem of how this Applicant's construction activities at this location - whether day or night - would contribute significantly to the mix of **cumulative impacts from the existing NSIP projects** in Oulton, both of which are gearing up right now to generate massive amounts of HGV traffic, with its attendant noise, vibration and emissions over the next several years. Hornsea Three and Vanguard/Boreas have to date confined themselves to daytime works and traffic only –	The **OCoCP (Revision E)** [REP5-029] includes a requirement that, if the relevant project construction schedules overlap, the SEP/DEP Principal Contractor will liaise with the principal contractors for the Hornsea Project Three and Norfolk Vanguard projects, as well as the Local Planning Authorities. This liaison will ensure that simultaneous working at similar locations will be considered (alongside appropriate mitigation measures), thereby minimising the potential for cumulative construction noise effects to occur. It is important to note that the HDD drilling is likely to progress at around 40m per day per drill. For a drill length of 550m, the total duration of the construction works associated with this HDD is around 5 or 6 weeks. It is recognised that the traffic-related effects of Hornsea Three and Vanguard/Boreas are likely to have much longer durations. However, the cumulative effect of construction noise from the

PINS Question Number	Question	Applicant Response	Oulton Parish Council Comment	Applicant Response
			the addition of such a long run of HDD work for SEP/DEP in the same location, risks subjecting local residents to ***cumulative*** *construction noise and vibration over 24hours*, for days on end.	Dudgeon and Sheringham projects, for a period of 5 to 6 weeks, is considered unlikely to alter the overall effect of the noise from the traffic associated with the other projects.

Table 3 The Applicant's response to Oulton Parish Council's Comments on the Applicant's Third Written Question responses

PINS Question Number	Question	Applicant Response	Oulton Parish Council Comment	Applicant Response
Q3.20.2 Construction Effects on Sensitive Receptors				
Q3.20.2.1	**HDD Works at Night and Emergency Works** The Applicant sets out a list of mitigation to be used to try and avoid night time working [REP3-101, Q2.20.2.3]. a) Provide a revised OCoCP to include this mitigation. The Applicant has noted that drilling would be at a rate of 80m per day and the longest proposed drill is approximately 600m. b) Set out how this would be completed with daytime only works and do the drilling works have to be continuous once started or can they be paused overnight? Include suitable revisions in the OCoCP. See related question in ExA!s proposed changes to the dDCO.	a) The Applicant has submitted an updated **Outline Code of Construction Practice (Revision E)** [document reference 9.17] at Deadline 5 which includes additional detail in Section 10.1.3 (Night time working for the HDDs at the Solar Park). b) Other than the specific crossings of Stakeholders' apparatus, such as Network Rail who stipulate continuous HDD for safety reasons, the HDDs are not required to be continuous and will follow the agreed site working hours set out in Requirement 20 (Construction hours) of the **draft DCO (Revision H)** [document reference 3.1]. Mitigation measures to reduce the risk of night time working have been set out in previous responses [REP3-101]. Details relating to working hours and timings of work are outlined in the **Outline Code of**	OPC urges the ExA to require the Applicant to specify in the OCoCP exactly how they intend to mitigate the effects of night-time drilling noise and vibration, so close to human habitation, overnight on – potentially – 10 nights over a consecutive 15-night period.	Please refer to the Applicant's responses in Table 2 above (IDs Q2.20.2.3 & Q2.20.4.1).

PINS Question Number	Question	Applicant Response	Oulton Parish Council Comment	Applicant Response
		Construction Practice (Revision E) [document reference 9.17] Section 10.1.3.		