

## **Vattenfall Norfolk Vanguard**

### **Oulton Parish Council's submission at Deadline 5**

Oulton Parish Council (OPC) wish to comment on the Deadline 4 responses received by PINS, as part of its Deadline 5 submission, in relation to traffic and transport issues generated by the project in and near the parish of Oulton.

OPC agrees with the view of Broadland District Council (BDC) in regard to the Planning Inspectorate Appeal Decision for the AD plant in 2014 (PINS ref: APP/K2610/A/14/2212257) and its relevance to this project. OPC maintain that the traffic numbers proposed by Vattenfall and Hornsea Three will have serious implications for the flow of traffic along The Street, even with the proposed road intervention schemes.

Hornsea Three have put forward a road intervention scheme which OPC understand that NCC is requesting should be implemented by either Norfolk Vanguard (NV) or Hornsea Three (HOW3) depending on which project goes first. OPC seeks clarification from NV as to whether it agrees to implement the whole road intervention scheme proposed by Hornsea Three, if indeed it is NV that moves into construction first.

**OPC would prefer the management agreement between the two parties relating to the intervention schemes, and their decommissioning, to be part of the DCO.**

There are however problems with the road intervention scheme which, although allowing HGVs and Abnormal Loads to access The Street, fails to remove the existing pinch points along the 1km stretch of road, given the higher volume of traffic. This was clearly illustrated in OPC's Deadline 4 submission with VISSIM screen-prints.

1. **The Old Railway Gatehouse 'hump'**. The applicant has stated that they will implement the same road intervention schemes and the mitigation for the Old Railway Gatehouse as proposed by Orsted Hornsea Three, but to date have not documented this.

There needs to be clarification on what road intervention measures will be included if only Vattenfall proceeds. The applicant originally did not propose any road scheme, only a localised 'pilot vehicle management' approach.

OPC would want to ensure that The Old Railway Gatehouse would still obtain full mitigation measures given that the traffic produced for Vattenfall in isolation would still contribute a substantial increase to existing traffic on The Street.

After the re-grading and smoothing of the hump, the road will remain the same width with priority signage. Only one vehicle will be able to cross at a time. The re-surfacing of the road has been put forward as mitigation by Orsted as a residential amenity issue to reduce the noise levels at The Old Railway Gatehouse but it should be noted that the smoothing of the hump is also to prevent grounding of HGV low loaders.

It remains unclear whether the re-grading of the road hump is only to facilitate site access rather than improving residential amenity, given that the priority signage could easily lead to *increased* noise events for the residents, due to traffic - specifically HGVs - slowing, stopping and starting within close proximity of the Gatehouse.

Clearly, OPC seeks continuity of approach where two projects are accessing the same routes with similar volumes of traffic and timescales, especially given the higher percentage of HGVs. OPC understand that there is continuing dialogue between Orsted & Vattenfall but it is still unclear how each project will interact at a number of points along The Street. The crossroads of Heydon Road with The Street, to be used by both Vattenfall and Orsted's Main Construction Compound entrance, is a key pinch point.

The section of road immediately to the south of this crossroads is extremely narrow. Will there be some sort of traffic control at the crossroads to allow for large HGVs to turn onto The Street safely before travelling south to B1149?

OPC have not seen any evidence that Vattenfall has taken competing agricultural traffic into consideration. The large adjacent agribusinesses (Street Farm, Saltcarr Farm, Hook2Sisters poultry farm) produce an enormous amount of harvest and HGV activity. Has Vattenfall completed any sort of traffic analysis on the local road network and specifically during the sequential harvest periods of cereals, beans, potatoes, maize, carrots and sugar beet? These harvesting processes continue relentlessly throughout the months from July until after Christmas.

**2. LINK 68:** OPC still question how each project will interact with each other's traffic. It is noted that the B1149 is the main route to Link 68. Vattenfall are not proposing trench-less crossing (HDD) at the point where it crosses the B1149. OPC maintain that the B1149 is not wide enough for a single lane closure and traffic control, therefore an open trench crossing would generate a road closure scenario. NCC and other interested parties have indicated strongly the need to use trench-less crossing at that point. Given the cumulative traffic using this route to Link 68 and HOW3 Main construction compound, how will this section be managed if there is a need to close the B1149? Where will traffic be diverted to?

**3. Link 75:** Vattenfall are proposing a 'pilot scheme' along the Blickling Road.

#### **11.39 (Applicants response to ExA written questions)**

***The OTMP (document reference 8.8), Section 1.7.1. sets out the principles for managing construction HGVs on minor routes where two-way HGV traffic is constrained. Link 75 (B1354 – Blickling) is identified as one of these constrained routes and a 'pilot vehicle' strategy is identified to manage the peak demand of 4 HGV movements an hour. The final traffic management plan (TMP) will be produced post-consent which will accord with the principles set out in the OTMP. This is secured through Requirement 21.***

This link is of some considerable length with few obvious off road pull-ins or turning spaces. OPC queries how a 'pilot vehicle' strategy will work along this heavily used link road between Aylsham and North Norfolk. There are a number of large agribusinesses operating along this route and it is a significant feeder route to Blickling Hall. The Blickling Road is notorious for consistent and numerous accidents along it, not all reported, but noted by local residents. So far in the 3 months of this year there have been two, one near to The Tower on the Blickling 'bends' and the other at Blickling Church, demolishing (yet again) the church graveyard wall.

The Applicant's statement above that " the final traffic management plan (TMP) will be produced post-consent " *is entirely unsatisfactory*. The use of Link 75 needs to be thoroughly assessed during the Examination process and the results scrutinised by the ExA.

#### 4. Cable Logistics area

##### 11.39 (Applicant's response to ExA written questions):

*The Applicant refers to its response to first written questions Q11.25 (ExA; WQ; 10.D1.3) which details the purpose of the Cable Logistics Area. It is the Applicant's preferred strategy to deliver cable drums and associated materials directly to the joint locations from the supplier, and that the cable logistics area will seek to provide 'buffer' storage only should delivery or installation issues arise. For context, if 100% of the cable drums had to be delivered to the Cable Logistics Area prior to installation, and all cables are installed within a single year (single phase cable pulling as the worst case), this would represent an average of two cable drum deliveries per day (four HGV movements)*

OPC are concerned that the applicant has given a scenario above of 100% of all cable drums going to the Cable Logistics Area. This is not what we have been told so far, and OPC seeks clarification on whether or not the Cable Logistic Area is about to become a central hub for all cable deliveries?

##### **Q:11.39 (applicant's response to ExA written questions)**

*The Cable Logistics Area will also include a temporary site office, welfare and space for the storage of other materials associated with cable jointing such as cable joint kits and cement bound sand.*

*For the cable pulling phase, a conservative assumption of three HGV deliveries per day (six HGV movements) is considered for these requirements. Therefore, for context, the total daily HGV deliveries (cable drums and associated material) based on a conservative worst case can be considered to be up to 5 per day (10 HGV movements per day). A conservative assumption of up to 20 employee vehicles per day at the Cable Logistics Area is also provided for context.*

OPC is surprised by the use of the term "conservative" three times in the extract above. Is it not a *maximum design* worst case scenario that the ExA should be scrutinising - not one based on "conservative" estimates?

For the cable pulling phase OPC were given numbers of HGV movements that have been tabulated (see **attached Appendix 1**). OPC seeks clarification as to whether these HGV traffic numbers are included in overall traffic numbers within Link 68, or in addition?

5. Finally, OPC would like to revisit an as yet unanswered point in its Deadline 3 submission: Point 7 (Core Working Hours). OPC have been recently made aware that Orsted appear to be proposing **evening and night-time deliveries to their compound** – outside of core working hours. OPC is seeking clarification on this important point, but would like to know if Vattenfall also will be making any 'out of hours' deliveries to and from the Cable Logistics Area (for example, cable drum deliveries).

#### **Appendix 1 - Table of estimated Vattenfall HGV Movements to/from Cable Logistic area.**

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