From: Hornsea Project Three

Subject: EN010080 Hornsea Project Three - Oulton Parish Council Response to Deadline 1.

**Date:** 07 November 2018 14:25:23

Dear Sirs,

## Registration Number 20010316 - Oulton Parish Council.

Oulton Parish Council (OPC) welcomes this opportunity to submit a brief statement of our current position, as follows:

- 1. For clarity: OPC has no Statement of Common Ground with Orsted.
- 2. OPC has been requesting from Orsted detailed proposals on the Access Route to their Main Construction Compound since the first quarter of this year.
- 3. At a Working Group meeting with Orsted on 27<sup>th</sup> September only 5 days before the Preliminary Meeting some OPC councillors were given <u>our first sight</u> of the applicant's proposals for an Access Route to their Main Construction Compound at Oulton. These drawings and supporting documents outlined four potential plans: Options 1, 2, 3a and 3b.

During the meeting, 3a and 3b, involving one-way systems, were quickly set aside as unworkable and Orsted volunteered that they had been included "for completeness" only.

Options 1 and 2 were discussed more fully.

Option 2 outlined road-widening all along the narrow 1 km route from the B1149 to the entrance to the site, and was considered by OPC to represent crucial environmental threats to mature oak trees and hedges, and a dangerous legacy for future development of the site.

4. **Option 1** involved the use of slightly formalised temporary passing places and (permanent) improvements to the junction off the Holt Road with Oulton Street.

The PC, while acknowledging that this was probably the "least worst" of the only options on the table, nonetheless expressed major concerns about Option 1 on the following grounds:

- <!--[endif]-->Passing places are not an efficient way of managing this density of two-way HGV traffic over such a long period of time (10 years).
- <!--[endif]-->Orsted's traffic counts have been short-lived and inappropriately timed, such that they have grossly under-estimated the

amount of agricultural HGV traffic that will be competing for this access route for many months of every year.

- <!--[endif]-->No cumulative impact assessment has yet been forthcoming of the additional effect of the HGV traffic generated by Vattenfall's two compounds that are also proposed within metres of this site, and sharing the same access route.
- <!--[endif]-->This option contains no meaningful mitigation for the inhabitants of The Old Railway Gatehouse.
- <!--[endif]-->OPC maintains that the conclusions reached by the Planning Inspector in dismissing the AD Appeal in June 2014 (Ref: APP/K2610/A/14/ 2212257) have <u>not</u> been adequately addressed by simply lengthening some of the passing places and cutting back some hedges near the bend.
- <!--[endif]--> Therefore, OPC maintains that this density of HGV traffic would create highway dysfunction and impact negatively on highway safety for a period of up to 10 years.
- 5. The meeting continued with a discussion of an entirely different proposition viz: the possibility of Orsted creating their own access road directly off the Holt Road. Orsted claimed that they had "considered" this idea but that they had been unable to find a "willing landowner". OPC outlined several of the more direct routes that could be taken, across private land, thereby removing the construction traffic entirely from the public highway.
- 6. At the end of that meeting (27/9/18), OPC reminded Orsted that, as we are a statutory body, their range of Options for the access route would now have to be put to the full Council, and the residents, for their feedback.

The Parish Council has some concerns that, in the meantime, the applicant may have been promoting to third parties the idea that Oulton PC have in some way "agreed" to Option 1, or that we have "accepted" it as the "least worst" option.

## This is absolutely not the case.

7. Since this meeting with Orsted (27/9/18), the applicant's proposed Access Strategy was discussed at the next full meeting of Oulton Parish Council on 23<sup>rd</sup> October, when many residents and 2 key landowners were present and participated in the discussion.

The outcome of this meeting was that the Council and the residents had grave concerns about all 4 of the Access Route Options and much preferred that Orsted should explore further the notion of a direct access route off the Holt Road. This Option became known as Option "R" (R= resident).

Neither of the 2 key landowners present expressed an overriding objection to this idea, and one in particular responded that he was "always open to negotiation".

Such a dedicated access road would have many significant advantages:

- it would take all Orsted's construction traffic off the narrow lane, avoiding all the competing agricultural, commuter and residents' traffic. At a stroke, this would minimise the otherwise severe impact of this construction traffic on the residents of Oulton, and other road users, over 10 years;
- it would avoid the risk of permanent loss of trees and hedgerows through root compaction caused by the density of HGV traffic over 10 years;
- it would not have to be constructed to NCC highways standards;
- it would significantly mitigate the effects for The Old Railway Gatehouse and obviate the need for works on 'the hump'.

It was agreed at the Parish Council meeting that Orsted should be encouraged, with all possible speed, to explore further the possibility of implementing Option R.

8. On 2<sup>nd</sup> November, OPC councillors were given our first opportunity to meet with NCC (Highways) to discuss Orsted's Access Strategy to the compound. We clarified with them our continuing misgivings about the feasibility of Option 1, and described to them the alternative approach embodied in Option R. We asked for an "in principle" opinion as to the feasibility of this suggestion, before approaching Orsted.

NCC replied (and later confirmed in writing) that:

"in principle NCC have no overriding objection to the creation of a new access on the Holt Road - provided any such access meets with current design standards, in particular relating to highway safety."

- 9. To summarise: Oulton Parish Council's current position on Orsted's Access Strategy for the Main Construction Compound is as follows:
  - <!--[endif]-->We dispute that Option 1 represents a feasible or safe traffic management plan for this density of 2-way HGV traffic over a period of up to 10 years, for all the reasons outlined at point 4;
  - <!--[endif]-->The residents of Oulton, in open discussion at a Parish Council
    meeting on October 23<sup>rd</sup>, have put forward an alternative proposal (Option
    R) for a dedicated access route to be created by Orsted directly off the Holt
    Road to the compound;
  - <!--[endif]-->At that same meeting, key landowners who might be affected expressed a willingness to consider this proposal;
  - <!--[endif]-->NCC (Highways) has stated that they have, in principle, no overriding objection to the creation of a temporary access directly off the Holt Road.

For all the reasons stated above, Oulton Parish Council has recently requested of Orsted that the applicant should explore with due diligence the opportunity represented by the proposal in Option R, to remove all their construction traffic from the southern end of Oulton Street, by creating their own dedicated access route.

Paul Killingback Chair Oulton Parish Council

## PROCEDURAL MATTERS

- 1. Oulton Parish Council (OPC) would like to register its wish to speak at the Open Floor Hearing on Monday 3<sup>rd</sup> December, on matters relating to the Main Construction Compound at Oulton.
- 2. OPC would also like to register its wish to attend and speak, if appropriate at the following Issue Specific Hearings:
  - <!--[endif]-->4<sup>th</sup> December 2018: <u>ISH on alternatives/design flexibility</u>; the topics of interest to us being the use of HVDC/HVAC, and the Ducting method.
  - <!--[endif]-->6<sup>th</sup> December 2018: <u>ISH on the Draft DCO</u>; the topic of interest to us being issues relating to the Main Construction Compound including amenity issues, traffic and transport, the siting of the access route and its de-commissioning.
  - <!--[endif]-->7<sup>th</sup> December 2018: <u>ISH on other onshore matters</u> **if** the subjects covered in this Hearing are a more appropriate forum for our concerns than the 6<sup>th</sup> December (Draft DCO) Hearing.
- 3. OPC seeks guidance, as indicated in the bullet point above, as to which Hearing is the most appropriate forum for matters relating to the Main Construction Compound.
- 4. OPC would like to register its wish to attend any <u>Accompanied Site Inspection</u> (ASI) that would include the site of the Main Construction Compound at Oulton, its access route, and the immediate surroundings.

In the event of such an ASI, the Parish Council would like to suggest that the following viewpoints be considered:

- <!--[if !supportLists]-->• <!--[endif]-->the proximity of that entrance to the 2 compound sites proposed by Vattenfall
- <!--[if !supportLists]-->• <!--[endif]-->the proximity of the main agricultural depot of EF Harrold at Street Farm
- <!--[if !supportLists]-->• <!--[endif]-->the proximity of residential properties to the northwest of the compound on Shepherd's Lane
- <!--[if !supportLists]-->• <!--[endif]-->the situation of The Old Railway Gatehouse.
- 5. Given that the Main Construction Compound is situated approximately midway along the cable route, OPC seeks clarification as to which ISH it would be more appropriate for it to attend, in the event of separate Hearings for the north and south sections of the cable corridor.

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