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**To:** Norfolk Vanguard  
**Subject:** VATTENFALL NORFOLK VANGUARD - Registration identification number: 20012656

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### **Oulton Parish Council submission at Deadline 1.**

Oulton Parish Council (OPC) welcomes the opportunity to make comments as part of Deadline 1 and also confirm its attendance at the Hearings on 5<sup>th</sup> to 7<sup>th</sup> February 2019, reserving the right to speak.

OPC requests the Panel make an Accompanied Site Visit to the Junction B1149/1 km length of The Street, Oulton, to consider the access route proposed by Vattenfall NV/Boreas, which is also to be used by Orsted Hornsea Project Three to access their Main Construction Compound nearby.

#### **1. Cumulative Traffic: Vattenfall & Orsted**

OPC has studied the HGV movements and timeframe for Norfolk Vanguard utilising **LINK 68/Mobilisation area (MA7) and Cable Logistic Area**, which includes the pre-ducting for Boreas. It is anticipated that the use of this site will generate **176 daily vehicle movements, of which 96 will be HGV.**

Additionally, Oulton will be affected by the HGV movements proposed for LINK 75 along the Blickling Road – **72 HGV movements daily**. This is a highly unsuitable road with narrow carriageway and sharp bends.

To date, no cumulative impact assessments have been published for the proposed shared access route **B1149/The Street** to be used by Vattenfall and by Orsted Hornsea Three to their Main Construction Compound. The development and use of Orsted's compound will have a significant impact on the Vattenfall project - especially as Orsted will be using their main construction compound at Oulton throughout the entire life of their project - potentially 2 x 4 years.

The key issues identified to date are: -

- Cable drum deliveries (Abnormal Loads). Orsted will transport from a port on low loaders as abnormal loads all of their cable drums (**1,121**) to Orsted's Main Construction compound. These will arrive by ship (**36 drums per ship**) and be transported at a rate of **8-12 a day over 3-5 days every 3-5 weeks**.
- These cable drums will then leave the Compound to the cable route periodically during the other weeks during construction. (Orsted are not proposing pre-ducting for cables, unlike Vattenfall)
- Although these deliveries to and from the Main Compound are part of Orsted's proposed 118 daily HGV movements, their size and frequency does raise the prospect that The Street will become unusable for all vehicles at some points during the day. This will directly affect Vattenfall's operations.
- OPC has concerns that traffic generated by various agricultural activities that use this route consistently, throughout multiple prolonged harvest periods, have not been adequately taken into account.
- OPC has recently met with Norfolk County Council Highways (NCC). NCC have concerns the cable drum sizes initially intended will not be able to be transported along the rural road network. As a result, Orsted

have proposed using smaller cable drums. OPC must assume smaller drums will hold less cable and therefore have the effect of increasing the number of HGV deliveries to maintain the volume of cable needed for the project.

- It is unclear if the empty cable drums are to be returned to the Compound prior to return to port, creating additional abnormal load movements.

## 2. Vattenfall: Norfolk Vanguard/Boreas projects.

Taking the Vattenfall Norfolk Vanguard/Boreas traffic in isolation without the cumulative impact of Orsted, OPC have a number of concerns. Vattenfall are proposing to send most of their cable drums directly to the cable routes and only occasionally store cable at the Cable Logistic Area but cable drums will nevertheless go down the **LINK 68 /cable route**.

- Will cable drum deliveries also be classed as abnormal loads?
- Do the traffic numbers include returning empty cable drums?
- What analysis of current traffic using this route has been done?
- How has the significant, seasonal, and crop-dependent agricultural traffic been assessed? The knock-on effect of significant highway dysfunction could be that existing local traffic and agricultural vehicles re-route through the residential settlement of Oulton Street to avoid the southern part of The Street to the B1149 junction. This would impact severely on residential properties that front directly onto the road, with no footpaths. It must be understood that residents of the settlement of Oulton Street have already almost reached breaking point in their ability to absorb the existing levels of continuous agricultural HGVs passing their homes, and any increase in such traffic would be intolerable.

OPC understand that Vattenfall are proposing a 'pilot vehicle' system for HGVs in and out of their site and are not proposing any modifications to The Street, to enable it to accommodate large vehicles along the access route, in particular low loaders / HGVs. This proposal would have significant implications for existing traffic (especially agricultural). For this to operate along a 1km length, OPC anticipate that significant 'held' traffic would queue back on to the B1149 junction, a clear highway safety issue.

- Has this proposal been discussed and agreed with NCC Highways?
- Has a safety audit been done on the B1149 junction with reference to the accident record? OPC would point out that a number of accidents have occurred at this point (most recent November 2018).

OPC doubt that such a system could work effectively. The residents of 'The Old Railway Gatehouse' (already affected by the cumulative traffic impacts of both projects) would be 'locked in' to a management system around them.

- What mitigation proposals do Vattenfall have in respect of this property and in respect of the road hump outside this property that could prevent the use of low loaders delivering to their cable storage site?
- What, if any, analysis has been carried out by Vattenfall on the planning history of the area, and in particular the Appeal Decision in respect of an Anaerobic Digester on the airfield site. (APP/K2610/A/14/2212257)? The use of the southern end of The Street for large numbers of agricultural/HGV traffic and potential highway dysfunction was the key consideration in rejecting that application. This was despite plans for improvements to the informal passing places – which are not in the Vattenfall proposal.

OPC still doubt the effectiveness of how Vattenfall will manage their traffic and whether the modifications proposed by **Orsted** for The Street are being relied upon by Vattenfall, and are in fact a key part – though undeclared - of their mitigation plans.

## 3. Statement of Common Ground

Due to other commitments, OPC have only recently been able to arrange a meeting in early February 2019 with Vattenfall representatives to discuss traffic and cumulative impacts as part of a working group. OPC

did meet with Vattenfall's traffic and construction engineers as part of the Boreas consultation, but work on a Statement of Common Ground has not been progressed.

OPC are however supportive of the use of ducting for the projects and the commitment to HVDC technology.

Paul Killingback  
Chair  
Oulton Parish Council

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