

Oulton Parish Council's observation on Applicants response at deadline 8 re Noise Assessment for The Old Railway Gatehouse and OTMP (deadline 8) for Link 68

Oulton Parish Council (OPC) wish to reiterate their ongoing concerns in regard to how the Noise Assessments have been carried out in respect of the cumulative impact of Norfolk Vanguard and Hornsea Project Three both constructing at the same time and using the same access routes.

The Noise Assessment and the use of 18hrs as the methodology to produce the final results has assumed that the routes will be used in the same way as existing traffic, and that inputs to produce a noise model would be a generic mix of vehicles as currently exists, spread out over those 18hrs (day time). The model for NV/HOW3 is different as there are known numbers of vehicles, type and operating times.

The averaging of traffic noise over 18 hours gives the wrong outcome when the majority of the construction traffic will pass The Old Railway Gatehouse over a **12 hour** period and if Peak delivery time restrictions are imposed for HGV's on LINK 68 as well as other routes this will further impact by adding to the hourly rate of traffic movements over a reduced **10.5 hour** working day; the assumption is that the same number of vehicles will still have to run daily to meet the demands of the construction process or the construction process will need to be extended.

E.g. NV 96 HGV's 12 hour day = 8 an hour (Peak) or with peak time restrictions 10.5 hour day = 9 an hour (Peak)

Cumulative with HOW3 214 HGV's 12 hour day = 17 an hour (Peak) or with peak time restrictions =20 an hour

The outcome for traffic noise at any given point along a route is governed by the project working hours, imposed peak time delivery restrictions, the speed of traffic and a roads ability to function exactly as assessed; this is not what happens in reality. **The reality of Noise generated over a concentrated 12 hour day (or 10.5 hours if peak time delivery restriction is imposed) will be different from the 18 hrs as in the Noise Assessment and will be noticeable.**

The measured speed by HOW3 of 69kh (42mph) and 96.6kh (60mph) as used by Vattenfall to form the Noise Assessment is flawed as the whole of 'The Street' will be subject to a speed restriction of 30mph. This means the data input into the noise assessment is not correct for the projects lifetime.

Both projects have used the reduction in speed as a form of mitigation. OPC have with both projects tried to point out that with a speed reduction comes a build-up of vehicles along this route, especially with HOW3 Abnormal Indivisible Load's (AIL) whose speed will be below 30mph. During the delivery of HOW3 AIL's there will be the need to stop traffic movements along 'The Street' this will further constrict the flow of traffic.

Both projects have accounted for the numbers of their construction HGV's and along with the formation of passing places to accommodate two HGV's an assumption is that this will result in a steady traffic flow. Both projects have only produced a snap shot of traffic over a few weeks by the use of ATC or estimation of traffic numbers. Other traffic in the form of agricultural vehicles and HGV's is an unknown quantity and this will vary over the course of the year, dependant wholly on where and when a specific harvest is and the time of year. Harvest periods are now longer due to the more varied crops produced. OPC are still of the opinion that these factors have not been fully understood. In the OTMP the delivery management measures propose to liaise with local groups re harvests etc. in order to seek a managed delivery without impacting on construction work. OPC question how this will be achieved when taking account of how many farms will be impacted and how this will be coordinated during busy harvest periods without further condensing construction delivery hours?

The combined construction work from two projects working across Norfolk at the same time on multiple routes is something the methodology used to assess noise (and air quality) has not been adequately accounted for. The use of mitigation to reduce noise levels to an acceptable 'minor adverse' on paper is speculative and remains to be proven.

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