

Our ref:

Your ref: HORN-009

The Planning Inspectorate
National Infrastructure Directorate
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Bristol, BS1 6PN

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07/11/2018

For the attention of: Mr David Prentis

Dear Sir

Hornsea Project Three Offshore Wind Farm (EN010080): Written Statement

I refer to your letter of 9 October regarding the above proposal and as an interested party, your invitation to submit written representations to the ExA's Written Questions set out in Annex A to your letter. You have requested that any representations should meet Deadline 1 (17 November) as set out in the Examination Timetable.

Specifically, you have asked for responses to three questions; responses to which are set in the attached note. These responses should be read in conjunction with the Statement of Common Ground between Highways England and Orsted Hornsea Project Three (UK) Ltd which has been submitted to you by the applicant.

Yours faithfully



Eric Cooper
OD East Spatial Planning Team Leader
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Orsted Hornsea Project Three Off-Shore Wind Farm (EN010080) Written Statement by Highways England 07Nov2018

1.0 Introduction

Highways England have been invited to provide written representations to the ExA's Written Questions for this project. The relevant questions to Highways England and our responses are set out below.

Q 11. Transport and Highways Safety

WQ 1.11.1 – Do you agree with the methodology, baseline data and predicted traffic movements used to assess traffic and transport impacts in the ES [APP-079]? Please identify any outstanding issues.

Baseline and Assessment Methodology

Highways England is content with the methodology used to inform the traffic and transport impacts of the proposals on the A47 and A11 trunk roads. There are no specific points to raise which would affect the outcomes of the assessment or its associated mitigation.

Highway England has been in discussion with the applicant on the transport assessment and raised a number of comments to which responses were provided on 2nd November. They are in the course of being reviewed. These matters largely relate to collision analysis and Design Manual for Roads and Bridges (DMRB) compliance, including HGV swept path analysis to confirm there are no safety concerns resulting from the traffic impact of the proposals on the trunk road. It has been agreed that there will be no direct access to any construction sites directly off the trunk road.

With respect to the use of the A47/A1074 Longwater, A47/ A140 and B1113/A140 junctions by workforce during construction, it is likely to be low proportionate to the existing movements on the network. It has been agreed between the parties that no further work beyond the provision of likely movements to inform a sensitivity test will be required. The outcomes of the sensitivity test will be used to identify site-specific measures to be included in the detailed Construction Traffic Management Plan (CTMP) post-consent. It is agreed that the CTMP will be developed to ensure those junctions mentioned will operate, as far as practicable in a safe and efficient manner

Subject to reviewing and agreeing the responses referred to above, Highways England will have no specific points to raise.

Traffic and Transport Impacts

Highways England has discussed the capacity and characteristics of the junctions along the A47 and A11 trunk roads affected by the proposals and is content that no junction capacity modelling is required except in the two locations listed below.

A47/A140 junction

The impact of the proposals on the local road A140/B1113 junction is a matter for Norfolk County Council (NCC). Highways England will require confirmation from NCC of their acceptance of the impact of construction traffic on this junction, in order to address the risk of a queue of traffic tailing back to, and affecting the operation of, the A47/A140 junction.

If the junction mentioned above is found not be operating in a safe and efficient manner, or where traffic modelling or on site monitoring during construction determines that there is an issue, suitable mitigation measures will be needed to be developed in consultation with Highways England and NCC.

A47/Taverham Road Honingham Junction

It has been agreed with the Applicant that analysis of the A47/Taverham Road Honingham junction should be undertaken which includes accident records, DMRB compliance checks and HGV swept paths. Highways England agrees that a transport modelling is not required.

Highways England will review the analysis but does not foresee any concerns which could not be managed through the detailed Construction Traffic Management Plan CTMP.

In order to minimise the risk of a queue of stationary traffic developing on the main carriageway of the A47, the CTMP should include measures to avoid a situation in which two HGVs (one arriving, one leaving the site) will attempt to use this junction at the same time.

Construction Traffic Management Plan (CTMP)

Highways England is content that a the CTMP can and will be developed to ensure any relevant junctions along the trunk roads will operate, as far as practicable in a safe and efficient manner. Where traffic modelling or on site monitoring determines that this is not the case, it will be necessary for suitable measures such working hours restrictions on construction sites in the vicinity, and/or the provision of queue length detectors on A47 slip roads linked to Variable Message Signs alongside the main carriageways of the A47 to advise drivers approaching these junctions of the risk of encountering excessive amounts of queueing traffic. It would be expected that on-site monitoring and mitigation measures such as those set out above will be implemented for the duration of the works

to the satisfaction of Highways England and in compliance with its usual standards and policies in place at the time.

Q 14. Compulsory Acquisition

WQ 1.14.20 - Paragraph (5) of Article 20 would dis-apply Article 20 in respect of statutory undertakers and refers to section 138 of PA2008 and Article 27 of the DCO. Article 27 refers to Schedule 9 (protective provisions).

Are you satisfied that your interests are adequately protected, in particular where the proposed project would cross the A11 and A47 trunk roads?

Highways England have reviewed the proposed crossing locations on A47 and A11 and is content that its interests will be suitably protected. These in particular relate to

Horizontal Directional Drilling (HDD):

A Section 50 Licence (New Roads And Streets Works Act 1991) will be required to be entered into with a Geo-technical Certificate to be issued by Highways England.

Highways England have provided information in relation to HDD crossing procedure in relation to the A47 and A11 Strategic Road Network. It will be necessary that the requirements of DMRB HD22 and HA120 are met, including the production of Geotechnical Risk and Preliminary Sources Study Reports (PSSR) for the two crossing locations during detailed design, together with detailed crossing method statements which will be developed in consultation with Highways England.

It will be necessary for detailed proposals to be submitted at least six months prior to the anticipated start-of-works at the HDD crossing points (HDD locations 8 and 31).

Abnormal Loads:

At this stage it is not possible to understand fully the impacts of abnormal loads on the Strategic Road Network, as the applicant has not provided the port location to be used for this project and consequently abnormal load routeings have not yet been identified.

The routeings will be subject to an approval process which will be taken forward once further information on routeing is provided.

HE will require agreement to be reached prior to any onshore site construction takes place. Any approval will include where necessary site-specific measures to accommodate the abnormal loads along the specified routeings

WQ 1.15.5 - Highways England has drawn attention for the need to have regard to the delivery of improvement works to the A47 in the vicinity of the proposed cable crossing [RR-149].

What assessment has been carried out of the engineering requirements for the highway improvements and the cable crossing, such as to establish whether the two projects can co-exist satisfactorily?

How would the powers sought by the applicant interact with those which may in due course be sought by Highways England?

Should the Order include protective provisions in respect of Highways England?

The proposed crossing points (HDD31 and HDD8) are located in the vicinity of the A47 Tuddenham to Easton and A47/A11 Thickthorn Junction Road investment Strategy schemes

A47/ A11 Thickthorn Junction (HDD crossing location 31)

This scheme currently has a proposed construction start of late summer 2020, with a construction period of 20 months. The proposed cable crossing of the A11 lies beyond the extent of the works proposed as part of the A11 Thickthorn Junction RIS scheme; therefore, cable crossing works on the A11 at this location are unlikely to have an impact on the delivery of the A11 Thickthorn RIS scheme

A47 North Tuddenham to Easton (HDD crossing location 31)

This scheme currently has a proposed construction start of late summer 2021, with a construction period of 24 months. At this time, it is too early to confirm the delivery programme for the cabling works. Consequently it is not known if the cabling will be delivered before, during or after the A47 dualling works have been completed.

In the advent that the cabling works precede the A47 dualling scheme, the Applicant will deliver the cable crossing point across the existing road and provide enabling works to facilitate crossing of the future dualling and any connecting roads forming part of the scheme.

In the advent that the cabling works occur at the time of or after construction of the A47 dualling scheme, appropriate ducting will be incorporated into the scheme works by HE at no cost to HE. Subject to further development of the A47 scheme, this may extend to local connecting roads built as part of the scheme. Agreement and approval of the cable crossing point, including construction specification, methodology and implementation will need to be in place, prior to commencement of any works.

It is likely that any Orders for the two RIS schemes will follow after the granting of Orders for this project. Consequently, Highways England in its submission for a Development Consent Order (DCO) will reference any requirements for this wind farm proposal in its submission to the Planning Inspectorate. Whilst it may not necessary to specifically reference the RIS schemes in this proposed, for clarity and the avoidance of

doubt, it would be useful to set out or at least reference Highways England's requirements with respect to the proposed crossing of the A47 and A11 trunk roads. Highways England has not further comments to make.



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