

Norfolk Vanguard Offshore Wind Farm

Norfolk Vanguard Limited

Unresolved Traffic Matters Joint Position Statement with Norfolk County Council

Issue Specific Hearing 6 Action Points 2,4, 6, 8 and 12

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Photo: Kentish Flats Offshore Wind Farm

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1 UNRESOLVED TRAFFIC MATTERS

1.1 Introduction

1. During the Issue Specific Hearing on Environmental Matters (ISH6) on 24 April 2019, the Examining Authority (ExA) requested a position statement from the Applicant with Norfolk County Council setting out the latest position with regards to:
 - Cable Crossing Access Technical Note, including agreement/areas of disagreement (Action Point 2)
 - Link 36 and mitigation measures, including agreement/areas of disagreement (Action Point 6);
 - Details of mitigation for link 41 (Action point 7 previously addressed at Deadline 7);
 - Trenchless crossings, including agreement/areas of disagreement (Action Point 8);
 - Proposed package of measures for Cawston. Comments from Norfolk County Council thereon (Action Point 12); and
 - Submission of an updated Outline Traffic Management Plan (Action point 4).
2. The Applicant has subsequently met with Norfolk County Council on 13th May 2019 to discuss these matters and the position of both parties, as well as the steps to resolve these matters, are set out in the table below.

1.2 Position Statement

3. Table 1 sets out the position of both the Applicant and Norfolk County Council in relation to the unresolved matters raised during ISH6. The agreed steps to progress these matters and associated timescales are also set out in the final column of Table 1. The final positions will be captured within the final Statement of Common Ground between the two parties that will be submitted at Deadline 9.

Table 1 Unresolved Matters

Norfolk Vanguard Limited position	Norfolk County Council position	Next steps / Final position
Cable Crossing Access Technical Note (CCATN)		
<p>Norfolk County Council has responded at Deadline 7 confirming that this is related to the trunk road network and accordingly it is a matter for Highways England to respond.</p> <p>Highways has responded on the CCATN (Highway England Briefing Note 05) and agrees in principle to the approach set out in the CCATN.</p>	To be dealt with by Highways England rather than Norfolk County Council.	No further action
Link 36		
<p>Norfolk County Council has requested the use of an alternative route (Shortthorn Road) to avoid the village of Horsford along Link 36 (B1149). As this proposed diversion would take traffic off the B1149 and onto a lower classification road the Applicant had proposed an alternative diversion for the cumulative scenario with Hornsea Project Three. This alternative diversion would use Link 39 (A140) and Link 37 (B1145) and ensure that traffic remains on a road of similar or greater standard, in terms of the road hierarchy, compared to the B1149. The increased traffic on Link 39 and 37 would represent an impact of minor adverse significance (Link 37 was previously reported with cumulative impacts of minor adverse significance within the cumulative impact assessment submitted at Deadline 5 (ExA;ISH1;10.5.3) prior to the diversion of cumulative traffic from Link 36).</p> <p>The Applicant remains of the opinion that Link 36 is suitable for the proposed Norfolk Vanguard daily peak HGV traffic, with the inclusion of a traffic cap (peak daily HGV movements no greater than 132) and enhanced mitigation, and represents the most efficient route for construction traffic, in comparison to the diversion along Shortthorn Road, which would be 2km longer and require traffic to divert onto a lower classification road.</p>	<p>We have no objection to the alternative route proposed via links 39 and 37 but it needs be for all HGV traffic and not just in the cumulative scenario.</p> <p>We welcome the Applicant's commitment to avoid HGV traffic passing through Horsford and would stress that without this commitment:</p> <ol style="list-style-type: none"> 1. There are a significant number of residential developments taking place (and committed) within the village involving HGV construction traffic passing along the B1149 through Horsford. The LHA do not wish to see additional HGV loading on this route. 2. The applicant's proposal would still leave 132 daily HGV movements passing through Horsford – which would have a significant yet avoidable impact. 3. It is our firm belief there are two alternative routes which would have a negligible residual traffic impact and our request to divert onto either of those two routes is 	The Applicant and NCC have now reached agreement on the approach to Link 36.

Norfolk Vanguard Limited position	Norfolk County Council position	Next steps / Final position
However, the Applicant recognises NCC's concerns and as there is a suitable alternative that ensures traffic remains on roads of similar or greater standard, in terms of the road hierarchy, which would not result in any impacts greater than those previously assessed, the Applicant will commit to avoiding the use of Link 36 for all HGV traffic (both for Norfolk Vanguard alone and cumulatively with Hornsea Project Three). HGV traffic will instead be diverted along Link 39 (A140) and Link 37 (B1145). This commitment will be captured in the OTMP submitted at Deadline 8.	reasonable and would not place Norfolk Vanguard at position of disadvantage. NCC cannot agree the content of the Outline Traffic Management Plan unless the measures identified above are included.	
Links 41		
The Applicant has proposed to cap construction traffic to 128 daily HGV movements for Norfolk Vanguard during the six week school summer holiday period. This cap represents typical average HGV demand and will be achieved by re-scheduling non-critical construction activities. After the six week school summer holiday period, the cap will revert to the level set out in the CIA submitted at Deadline 5 (ExA; ISH1; 10.D5.3) i.e. 338 daily HGV movements for the Project alone. This commitment has been captured within the updated Outline Traffic Management Plan that was submitted to the examination at Deadline 7.	This is acceptable to NCC	No further action
Trenchless crossings of the A1067, B1149 and B1145		
An investigation has been undertaken in response to the concerns raised by NCC on the potential impacts of open cut trenching on the A1067 and B1149 and was submitted to the examination at deadline 7.5 (ExA;AS;10.D7.51). The findings are summarised below:	1) The commitment to trenchless crossing of the A1067 is welcomed. 2) The Applicant's response still misses our point. Our concern relates to traffic management. The applicant has submitted document AS-047	The Applicant and NCC have now reached agreement on the approach to crossing the A1067.

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<p>1) A1067 – Forecast traffic flows would exceed the total vehicles per hour level at which single lane traffic management may be undertaken without network disruption. It is therefore now recommended that a trenchless crossing is implemented to mitigate the potential road network disruption. This trenchless crossing will be captured in an update to DCO Requirement 16 submitted at Deadline 8. The Applicant has set out in the document submitted at Deadline 7.5 (ExA;AS;10.D7.51) that the mobilisation areas either side of the A1067 can be repurposed to be used as drilling and receiving compounds to enable this trenchless crossing to be undertaken within the existing Order limits. No further work is proposed.</p> <p>2) B1149 – Forecast cumulative traffic flows were examined and would fall well below the total vehicles per hour level at which single lane traffic management would lead to network disruption. The drawing presented in Appendix F to the trenchless crossing report submitted at Deadline 7.5 (ExA;AS;10.D7.51) provides an indicative arrangement for the single lane management. The coned area shown allows for a working width of 30m for the open cut trench, but in practice this would be no more than 20m allowing for a greater area within the Order limits to accommodate the swept path of HGVs and abnormal loads.</p> <p>3) B1149 – Norfolk Partnership Laboratory (NPL), investigated ground conditions at the B1149 to ascertain if an appropriate road reinstatement specification (to address additional concerns raised by NCC) would be feasible. The testing indicates that the road subsurface has good load bearing properties and a specification was identified for the reinstatement that</p>	<p>“Technical Note Responding to Norfolk County Councils Request for Trenchless Crossings of the A1067 and B1149”. Appendix “F “ to that document includes a drawing to show the proposed traffic management. The intention is to widen the road (as indicated pink) but the tapers at both ends of the pink land are very short – i.e. it is not clear if HGVs or abnormal loads will be able to negotiate the sharp diversion onto/off the pink land. The applicant has not extended the length of the pink land because it lies outside their control. Accordingly, we are still not convinced this is achievable.</p> <p>3) Subject to clarifying the above, the re-instatement specification would be acceptable.</p> <p>4) At this stage we are still not yet convinced the proposed traffic management measures will work and we need to see swept path analysis. This is important because the applicant has repeatedly indicated they do not control sufficient land to carry out trenchless crossing and it now appears they may not control sufficient land to carry out open cut either.</p> <p>The applicant needs to provide swept path analysis to show that HGVs and abnormal loads can physically negotiate the proposed roadworks to the B1149.</p> <p>If additional land is required outside the pink land, then the applicant needs to demonstrate they either have control of that land or that it forms part of the public highway.</p> <p>In the meantime, the applicants do not have an agreed Outline Traffic Management Plan.</p>	<p>The Applicant and NCC have not yet been able to reach agreement with regards to crossing the B1149. The area of disagreement is now limited to a subsequent request by NCC for the Applicant to demonstrate that there is sufficient swept path for vehicles using the localised widening proposed. The Applicant will provide this information to NCC and update the examination at Deadline 9.</p>

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<p>will minimise the potential for future maintenance liability.</p> <p>4) B1149 – An open cut trench crossing is therefore still deemed appropriate as there is no evidence from the investigations to suggest that this form of open cut crossing and associated reinstatement will cause significant adverse impacts or present a maintenance liability for NCC.</p>		
Link 34, B1145 Cawston – Highway Mitigation Measures		
<p>The Applicant submitted a CIA at Deadline 5 which identified the requirement for mitigation along the B1145 through Cawston (Link 34) to mitigate potentially significant pedestrian amenity impacts associated with the combined peak construction traffic flows for both Norfolk Vanguard and Hornsea Project Three. The measures identified included enhanced pedestrian facilities, managed parking and road safety measures. As part of this the Applicant committed to peak traffic not exceeding 144 daily HGV movements for Norfolk Vanguard alone during the cumulative scenario. This would ensure that cumulative HGV movements (combined with Hornsea Project Three) would not exceed 271, which would reduce the identified pedestrian amenity impacts to minor adverse.</p> <p>Following discussions with Cawston Parish Council the Applicant has sought to further reduce this peak traffic to as low as practicable within the existing construction programme. The Applicant is now able to commit to a 1 week peak of 112 daily HGV movements (in both the single project and cumulative scenario), which will reduce down to 95 daily HGVs for a further 22 weeks, and then 44 daily HGVs for a further 13 weeks. These reductions do not change the findings of the CIA (the residual impacts remains minor adverse), however, they recognise the concerns of Cawston Parish Council and represent a further</p>	<p>The proposed reduction in traffic numbers is greatly welcomed however our position in relation to Cawston remains unchanged.</p> <p>Whilst it is true to say that a Stage 1 safety audit has been submitted, nevertheless the auditors raised several concerns that have not been addressed. These concerns were appended to the County Council's response to the Planning inspectorate dated 2 May 2019.</p> <p>At ISH6 we indicated we were due to receive the following documents from Orstead by the 3 May, however they have not yet been received: -</p> <ul style="list-style-type: none"> • Topographical survey • New ATC speed surveys • Update of the design through Cawston based on the safety audit and NCC comments • Vehicle traffic through Cawston based on the topographical survey • Update of the safety audit • Update of the Cawston Report 	<p>NCC believes a suitable access strategy can be delivered that mitigates the traffic impacts through Cawston. The current proposal needs several amendments to address issues raised during the road safety audit, but that these can be addressed post-consent.</p>

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<p>effort by the Applicant to reduce these short-term peaks to as low as practicable. The current scheme along with this further commitment is captured within an update to the OTMP submitted to the examination at Deadline 9.</p> <p>A Stage 1 Road Safety Audit has been undertaken by Hornsea Project Three for the proposed scheme of mitigation and NCC's own auditors have also reviewed the proposed scheme.</p> <p>The Applicant understands that NCC's position is that the proposed scheme of mitigation along Link 34 would be suitable to mitigate traffic impacts with the incorporation of a small number of amendments to address issues raised through the Road Safety Audit, which can be addressed during detailed design.</p> <p>The adopted scheme would be sufficient to mitigate impacts for Norfolk Vanguard alone, Hornsea Project Three alone or for both projects together. The first project to proceed to construction would deliver the full scheme of mitigation and the second project would be responsible for removing the measures once both project's construction phases are complete.</p>	<p>We await an updated Road Safety Audit from Orstead and amended mitigation scheme.</p> <p>Subject to a satisfactory safety audit, Norfolk County Council believes a suitable access strategy can be produced that mitigates impact however the intervention scheme drawings and proposal before us are very much "work in progress". In short, the scheme needs several changes, but we anticipate they will be amendments rather than a complete re-think.</p>	
Outline Traffic Management Plan		
<p>An updated Outline Traffic Management Plan was submitted at Deadline 7 capturing various commitments made during the examination. A further update to this has been submitted at Deadline 8 and captures commitments made since Deadline 7.</p>	<p>An updated Outline Traffic Management Plan was submitted at Deadline 7. We note this is to be updated again at Deadline 8.</p> <p>We are still assessing the changes but at this stage the applicants do not have an agreed Outline Traffic Management Plan and our concerns raised within this position statement still need to be addressed.</p>	<p>Updated Outline Traffic Management Plan to be submitted at Deadline 8.</p>