

**From:** [REDACTED]  
**To:** [Norfolk Vanguard](#)  
**Cc:** [Cawston PC](#)  
**Subject:** Cawston Parish Council - Deadline 8 submissions  
**Date:** 30 May 2019 21:02:33  
**Attachments:** [Cawston Parish Council response to Document Reference ExA Comments 10D7208 - Deadline 8 Submission.pdf](#)  
[Cawston Parish Council Submission for Deadline 8 - Updates on Traffic Incidents, Documents, Meetings and ExA questions.pdf](#)

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Dear Sir

Please find attached Cawston Parish Council's Deadline 8 submissions:

Cawston Parish Council Submission for Deadline 8 - Updates on Traffic Incidents, Documents, Meetings and ExA questions

Cawston Parish Council response to Document Reference ExA Comments 10D7208 - Deadline 8 Submission

Yours faithfully

Simon Court  
For Cawston Parish Council

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## CAWSTON PARISH COUNCIL SUBMISSION FOR DEADLINE 8

DETAILS OF TRAFFIC INCIDENTS IN RECENT WEEKS, RESPONSES TO DOCUMENTS PUBLISHED FROM DEADLINE 7 AND THE EXA'S FURTHER QUESTIONS, WITH AN UPDATE FROM OUR MEETING WITH VATTENFALL ON 28TH MAY

### 1. TRAFFIC

We reiterate our concerns over road safety on the B1145. In the month of May alone there have been several serious incidents:-

- sadly, there was a fatal accident on 19th May when a car left the road on the bridge over Marriotts Way. Our thoughts and condolences are with the families and friends of those involved.
- as previously reported, on 15th May an abnormal load got stuck in the High Street, causing gridlock and damage to property.
- there have been two separate incidents at Salle Beck bridge, a serious impact on the metal crash barriers on the south side and, some days later, another one on the brickwork on the north side. This brickwork had been damaged in an earlier impact and has now been almost completely demolished.

We have contacted NCC for their views regarding repairs and future signage at these black spots.

The Applicant seems to consider that this is a "viable route" for their additional traffic simply because it has B road status. A rational assessment based on a survey of the actual road itself would surely suggest otherwise.

### 2. DEADLINE 7 DOCUMENTS

We note the large number of submissions by Cawston residents, both at the Open Floor Hearing and in writing. This indicates the strength of feeling in the village, which we support and seek to represent.

### 3. MEETING WITH VATTENFALL 28 MAY

We had a further meeting with Vattenfall where a number of items were discussed.

- neither of us was aware of any developments in the Orsted traffic plan for Cawston since the version submitted by NCC at Deadline 7. We repeated our concerns that this scheme will not be workable in practice, nothing is being suggested that offers any benefit to residents, and that proposed reductions in parking provision will cause problems with displaced vehicles on unsuitable side roads.

- CPC has offered to carry out a survey of parking numbers on agreed dates in June, from a specification to be provided by VF, so that this issue can be discussed in more detail.

- there is still confusion over the possible use of Heydon Road for additional traffic, with a lack of information from Orsted.

- VF tabled their revised traffic forecast, reducing peak HGV movement numbers to 112 for one week followed by 96 for 22 weeks. We have used these figures in our calculations in section 4.

- there was a discussion on the definition of "HGV" for the purposes of these Applications, provoked by the range of base level numbers appearing in different papers in the Orsted files. See also section 4. VF suggested that vehicles in the 3.0 to 7.5 tonne group may have been defined as HGV in some calculations and not in

others. CPC is concerned over this lack of consistency and the possible implications in the prediction of noise, vibration and air quality assessments.

#### 4. EXA'S FURTHER QUESTIONS DATED 21ST MAY

We note Question 4.2 and would mention that the Government website on emissions, <http://naei.beis.gov.uk/emissionsapp/>, already indicates Cawston High Street as "Amber" for each of NO<sub>2</sub>, PM2.5 and PM10.

- regarding Questions 5.4 and 5.5, both Vanguard and Hornsea3 have committed to avoid school drop off and collection times, which leaves a working period of 9.5 hours. A revised peak HGV flow based on the new information from Vanguard above would be 112 plus 127 from Hornsea, ie 239. This equates to an average of 25.2 per hour. If the baseline of 127 is spread across 12 hours that gives 10.6 ph. The total would then be 35.8 per hour or an average of one every 101 seconds.

- however, we note that the Hornsea3 paper, "High Street Cawston – Highway Intervention Scheme", submitted by NCC at Deadline 7, has a table (2.1) in para 2.21 giving traffic figures taken in February 2019 which are much higher; 12 hour HGV figures of 189 to the west and 225 to the eastern side of Cawston. This would be consistent with the flow of Winery and other traffic into Chapel Street. If we use 225 as a revised baseline, this gives an hourly flow of 18.7. The revised hourly total becomes 43.9, or an average of one every 82 seconds.

#### 5. FROM WHAT HAVE BEEN TOLD THE CONSTRUCTION TRAFFIC MANAGEMENT PLAN'S CAWSTON INTERVENTION MEASURES NOW INCLUDES:

- We note the widening of the B1145 at its junction with Chapel St in an attempt to provide some manoeuvring space for HGVs but also to remove parking spaces on the triangle used as parking for Deli customers. The impact on local businesses and the amenity of Cawston residents is now being ignored, having been acknowledged when Orsted's original proposal to replace the Chapel St junction with a roundabout was withdrawn.

- Plans to remove residents' on-street parking to clear space on High St and Booton Lane for manoeuvring trucks.

- Plans to introduce waiting restrictions in the central area during the developers' working days displacing resident on-street parking.

- Preparedness to employ civil enforcement officers to enforce parking restrictions in Cawston if so called "voluntary" parking restrictions are ineffective.

- Withdrawal of the proposal to widen footways to enhance pedestrian safety. The Road Safety Audit recommends further detail be provided to the widening proposed and dimensions of both the footway and carriageway, not the abandonment of the widening proposals.

- A further observation is that the applicant, in the act of proposing mitigation measures, seems to anticipate approval even for "*doing something, however ineffective*" while the quiet dropping of those measures which might actually benefit Cawston residents like footway widening, it seems can be safely ignored.

**Cawston Parish Council**

**30<sup>th</sup> May 2019**

**Cawston Parish Council**

**Deadline 8 Submission**

Cawston Parish Council's response to Document Reference: ExA; Comments; 10.D7.208 Deadline 7  
*Alternative Construction Routes at Cawston, Applicant's Comments on Deadline 6 Written Submissions: Appendix 2*

**RESPONSE TO APPLICANT'S COMMENTS**

Applicant's Comment on proposed alternative construction route	Cawston Parish Council response
<p>8 Link 34 is the proposed construction access route to MA6 from the B1149 to the east for Norfolk Vanguard. As part of the updated Cumulative Impact Assessment for the Project submitted at Deadline 5 (ExA; ISH1; 10.D5.3), potential traffic impacts along Link 34 have been identified should the peak construction traffic of Norfolk Vanguard (two weeks) coincide with the peak construction traffic for Hornsea Project Three.</p>	<p>The proposal to construct an alternative construction traffic route is intended to reduce the potential traffic impacts along link 34.</p> <p>In meetings the applicant seems to accept that forcing large numbers of their own, and Hornsea Three's, HGVs through Cawston produce traffic impacts on receptors, as Cawston's residents are getting used to regarding themselves.</p>
<p>12 The Applicant has reviewed the proposal submitted by Cawston Parish Council in respect of the Applicant's proposed construction method and identified that it does not represent an appropriate alternative to the assessed route (Link 34).</p>	<p>Cawston Parish Council have made a constructive and imaginative proposal for an alternative route for construction traffic avoiding the B1145 through the village and the inadequate bridges over Marriotts Way and Salle Beck .</p> <p>Mr Rob Lilly, Vattenfall's Supply Chain Manager has been widely quoted as saying "There is going to be an increase in transport if Vanguard gets approved but we're doing everything we can to minimise the disruption."</p> <p>This is an appropriate alternative to the severe traffic disruption threatened in Cawston by the Vattenfall and Orsted projects.</p>
<p>13 The running track construction will progress outwards from MA6. The majority (~75%) of HGV deliveries along Link 34 to MA6 are associated with the construction of the running track (delivery of roadstone). These deliveries will have to take place before the section of the running track between the B1149 and the B1145 (the proposed alternative HGV route) can be completed. Therefore, the alternative route proposal would not be available to use as an alternative construction route during the period of peak construction traffic.</p>	<p>The proposal to construct the alternative route before duct installation commences would reduce peak HGV levels in the main construction period rather than increase them as the applicant states.</p> <p>If appropriate methods are adopted the haul road can be constructed from the Oulton direction, avoiding the need for alternative route construction traffic to travel through Cawston on Link 34</p>

14	Furthermore, it is the Applicant's intention to remove sections of the running track as soon as possible upon completion of the duct installation works and assessments have been progressed on this basis. Therefore, the alternative route proposal would be removed once duct installation to the B1149 has been completed, resulting in the running track along the alternative route proposal being available for up to two weeks within the construction programme only.	<p>The applicant has designed their project with the intention of shipping every tonne of construction materials through the narrow streets of Cawston.</p> <p>It is perverse in the extreme that, having caused such an impact in Cawston to build their haul road, the applicant will then dismantle the route and cart it all back through Cawston again a fortnight later.</p>
15	The Applicant has further considered how the construction methodology in this location could be amended to facilitate the construction of the running track from the B1149 to MA6, prior to duct installation works, to implement the alternative route proposal.	<i>"There is going to be an increase in transport if Vanguard gets approved but we're doing everything we can to minimise the disruption."</i>
16	The alternative route would require 2.8km length of the running track to be pre-constructed prior to MA6 and duct installation works and retained in place for 3-4 years if also used for Hornsea Project Three to mitigate cumulative impacts. The impacts and other considerations of this have not been assessed but would include:	<i>"There is going to be an increase in transport if Vanguard gets approved but we're doing everything we can to minimise the disruption."</i>
	Additional land outside the Order Limits would be required at the B1149 to accommodate a small mobilisation area to facilitate the construction of the running track from this location, rather than in a sectionalised manner from MA6. This additional land would allow safe delivery and storage of materials and machinery to construct the running track and any junction works at the B1149. Any additional land and the impacts on that land have not been identified, assessed or negotiated with respective landowners.	<i>"There is going to be an increase in transport if Vanguard gets approved but we're doing everything we can to minimise the disruption."</i>

	<p>NCC has indicated that they would not accept any proposal to introduce a new access onto the B1149.</p>	<p>The proposed alternative route starts from south of Oulton and crosses the B1149 with the cable route, avoiding a new access onto the B1149. A simple traffic light controlled crossroads would seem to be the answer.</p> <p>Given the problems this and other applicants are proposing to cause in Oulton would it not be wise for Norfolk County Council to consider a whole new road to the west of the proposed Oulton depot and a new junction with the B1149?</p>
	<p>The impacts to this cable route section would begin earlier in the construction programme and extend throughout the duct installation and potentially for up to 3-4 years if utilised by Hornsea Project Three to mitigate cumulative impacts. This is compared to the sectionalised approach which would require the running track to be constructed as works progressed out from MA6 and be removed approximately 24 weeks after works started for Norfolk Vanguard alone.</p>	<p>The impacts of the traffic routed through Cawston on the B1145 will depend on the start dates for either wind farm project and are likely to impact the village for 3-4 years, making it worthwhile to expend some more time and resources on the alternative construction traffic route.</p> <p>The Norfolk Vanguard refined Programme Daily HGV Movements data recently presented to Cawston Parish Council shows traffic movements for around 58 weeks rather than the 24 referred to by the applicant.</p>
	<p>This increased timescale for retaining the running track for 3-4 years would affect commitments for temporary crossings of sensitive watercourses (including blackwater drain), minimising sediment input within the River Wensum Special Area of Conservation catchment, flood risk (land drainage), hedgerow reinstatement, topsoil storage and land use restrictions.</p>	<p>Mitigation measures for minimising sediment input could be undertaken. Similarly flood risk measures could be included in the improved specification for the haul road/running track alluded to previously.</p> <p>These challenges should not be insurmountable for an applicant who is “doing everything we can to minimise the disruption.”</p>

	<p>There are properties within 20m of the Order limits along this cable route section. Disturbance effects from the currently proposed construction method can be mitigated due to the short period that construction works would take place adjacent to each property (1-2 weeks). However, if the running track were retained for 3-4 years this would represent a significant change to the potential disturbance effect.</p>	<p>Cawston Parish Council suggested realignment of the cable route to the north of Cawston in its submission to deadline 5, <i>Cawston Parish Council Cable Route alignment north of Cawston</i></p> <p>The suggestion to realign the proposed cable route to avoid properties has been disregarded by the applicant. The realigned route would be around 200metres away from the properties mentioned.</p> <p>If the running track is not used to divert construction traffic there will be 3 – 4 years of disturbance in Cawston by the applicant's and Orsted's traffic.</p>
	<p>The materials required to construct the running track in advance of duct installation would need to be delivered over a condensed period (compared to at a rate of 150m/week over 20-24 weeks in line with duct installation).</p>	<p>The rate of delivery of materials depends to some extent on the construction methods employed.</p> <p>Building the running track could be timed before duct installation and so would be outside the peak times for duct installation traffic.</p> <p>Building the running track from the Oulton direction would avoid the need for materials to be hauled through Cawston on B1145.</p>
	<p>The running track has been designed to accommodate the necessary construction vehicles serving each workfront (a specification of up to 300mm aggregate up to 6m width, reduced to 3m width at watercourse crossings, has been assessed). In order for the running track to support the required quantity of HGV movements for both Hornsea Project Three and Norfolk Vanguard on a daily basis, the running track would need to have a more robust specification to ensure longevity (for example it may need to be a different depth or material). This would require a greater volume of materials to be delivered and in turn an increase in the number of HGV movements for the purpose of running track construction, with resulting impacts on the local and wider road network. These impacts have not been assessed as part of the application.</p>	<p>Building a more robust running track would seem to be sensible as it might need to last 3-4 years. The benefits of using a running track which can be used by both the applicant and Orsted would fully justify the additional cost of materials.</p> <p>Both wind farm developers would benefit from the reduction in financial and reputational risk that will arise from incidents on the B1145 in Cawston and its inadequate bridges.</p> <p>At a recent meeting with Cawston Parish Council, the applicant stated, while suggesting fewer truck movements might be possible during construction, that the exact needs for the running track would only be determined when on-site as different ground conditions may call for fewer materials or different approaches.</p> <p>It is regrettable that the applicant has not assessed the impacts on the wider road network of the alternative</p>



		<p>route proposal, or of other alternative routes.</p> <p>It is of course possible to make these assessments which can then be judged against the undoubted benefits in Cawston of diverting the construction traffic of two wind farm projects.</p>
	<p>The construction approaches of both Norfolk Vanguard and Hornsea Project Three differ and would not support the use of a shared access. It is the Applicant's intention to remove sections of the running track as soon as possible upon completion of the duct installation works, and to return the land to agricultural use. Assessments and land agreements have been progressed on this basis. Hornsea Project Three would require access between the B1145 and the B1149 for the duration of their onshore works which would extend the period post-construction of Norfolk Vanguard duct installation in which the running track is in place considerably. These extended timescale impacts have not been assessed as part of the application.</p>	<p>If the applicant believes that working with Orsted is not possible then arrangements for the crossing of the cable routes at Salle are a major problem for both projects.</p> <p>Cawston Parish Council understands that the dates for commencement for this project, if approved, would be determined by the outcome of a future auction for Contracts for Difference, which suggests there is time to assess the extended timescale impacts.</p>

## THE TRAFFIC MITIGATION SCHEME

The applicant relies wholly on a proposed traffic mitigation scheme which is being developed by the applicant, Orsted and Norfolk Highways to manage the cumulative impacts on Link 43. This is a dismal document which Cawston Parish Council considers fails to address the main issue impacting amenity in Cawston village which is HGV numbers.

The traffic mitigation scheme currently proposed includes Managed Parking. In Cawston managed parking means taking away on street parking. Residents will no longer be able to park outside their homes and no suitable alternative parking has been proposed. In the likely event that local people fail to "voluntarily" park in a yet to be defined location in our crowded village the prospect of waiting restrictions is threatened, together with Civil Enforcement Officers.

Road Safety measures include a 20mph limit for the whole of the village. HGV traffic travelling through Cawston at the moment regards 20mph as an aspirational target. A further road safety measure is the fantasy scheme of single way priority working, proposed for two locations on the High Street: one on the bend at the west end of the High Street, the other on the bend at the east end of the High Street by the Chapel Street junction. In both locations it is proposed to narrow the road so only a single vehicle can pass. Highway engineers seem to think this arrangement is workable. Others may question how drivers can see around a

corner before pulling into the single track section. This is even more of a problem if you are driving an HGV and you have a tail of following traffic which prevents you reversing.

If an HGV manages to enter the centre section of the High Street its driver must hope to encounter any oncoming traffic in the two small passing spaces created by parking restrictions. Anywhere else and reversing will be necessary. Cawston Parish Council's understanding of the current predicted peak HGV flow is that either 35 or 43 HGV movements through the village need to be completed in each hour. The impact of traffic on air quality, noise and vibration is the subject of ongoing discussions with the applicant and others.

It is currently proposed that parking around the Chapel Street junction will be reduced by an unannounced road widening, putting at risk local businesses which rely on parking for passing trade.

Enhanced Pedestrian Facilities are referred to by the applicant. These are mainly proposals to widen the footway in certain locations to make it safer for pedestrians to walk in the village while large numbers of HGVs negotiate the narrow High Street. The latest version of the Cawston Intervention Plan calls into question widening footways because this would narrow roads unacceptably, making it even more difficult for HGVs to pass and less safe for pedestrians to use footways.

It is the view of Cawston Parish Council that the applicant's reliance on the mitigation scheme fails to manage the impacts of its proposed operations in the village. Cawston Parish Council disagrees with the applicant's conclusion that there is not a compelling case to vary its construction method while constructing the cable route around Cawston.

The applicant seeks to minimise a range of impacts in its operations but has not given due consideration to the impact of construction traffic in Cawston. The cumulative impact of the applicant's construction activities and those of Orsted have not been considered beyond a commitment to work to a capped peak figure of truck movement.

If the applicant is truly *"doing everything we can to minimise the disruption"* then they should be prepared to rethink their approach to construction traffic routing for this one small section of their project and properly engage with Cawston Parish Council's proposal to bypass the village.

**Cawston Parish Council**

**30<sup>th</sup> May 2019**