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Subject: Response To Application Number EN010079 at NORFOLK VANGUARD - 470M offshore with landfill near Happisburgh  
Date: 07 June 2019 15:25:59  
Attachments: [Response\\_470M10079.pdf](#)

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Please find attached my representation in relation to the above planning application.

Regards

John R Shaw

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The Planning Inspectorate  
Room 3/13  
Temple Quay House  
2 The Square  
Temple Quay  
Bristol  
BS1 6PN

Your Ref: EN010079  
Date: 7 June 2019

My Ref: 8/1/18/0088  
Tel No.: 01603 223231  
Email: john.r.shaw@norfolk.gov.uk

Dear Sir/ Madam

**Application by:- Norfolk Vanguard Limited for an Order Granting Development Consent for the Norfolk Vanguard Offshore Wind Farm Project.**

I refer to the position statement issued to you yesterday by Norfolk Vanguard entitled "Norfolk Vanguard Ltd, Norfolk County Council Unresolved Traffic Matters Position Statement". This document was not submitted to Norfolk County Council prior to submission by the applicants and we had no sight of it until this morning. Whilst the deadline for submissions for deadline 9 closed yesterday, nevertheless given that we have not been given the opportunity to review documents submitted by the applicant in support of their application we hope the ExA will accept this letter as its discretion allows.

**Requested trenchless crossing of the B1149**

As the ExA will recall, Norfolk County Council expressed concern at ISH3 held on 7 February that an open cut trench to the B1149 would not be suitable as the applicants had not considered cumulative impact associated with the Hornsea 3 wind farm proposal. This is a concern we have maintained throughout the entire hearing process.

The applicants finally submitted a trenchless crossing report to the County Council on 15 May, which included details of the applicants proposed traffic management measures. The drawings attached to the report lacked detail and accordingly we subsequently asked the applicants to submit swept path drawings to demonstrate that Hornsea 3's vehicles would be able to negotiate the roadworks in safety.

Swept path drawings were submitted to us on 3 June and we responded on the 5<sup>th</sup> June to say the safety zone for the works was shown incorrectly and accordingly our concerns had not been addressed. **Contrary to the applicants claim within the position statement issued to you yesterday – the swept path drawings DO NOT in any way**

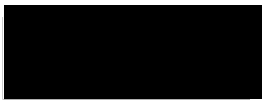
**demonstrate that the traffic management can be designed so that abnormal loads can physically negotiate the roadworks.**

The applicants position statement indicates the following statements: -

- The safe working distance of 1.2m can be accommodated in the final design.  
In response, this is clearly not acceptable. There must be a realistic expectation that a safe method of working is achievable. That expectation has not been met.
- The proposed road widening (the pink land) can be widened further to the west within the order limits.  
In response – we fully accept that but widening to the west is not the problem we have identified. The problem lies to the north and south of the pink land and not to the west.
- The coned off area can be narrowed from 20m down to 15m.  
In response – we have not seen any details to show how that would work.
- Speed restrictions could be imposed  
In response – We have already advised the applicants (5<sup>th</sup> June) that whilst this can be reduced with the use of a temporary 30mph speed restriction, it is not so in the case of an excavation exceeding 1.2 metre in depth.
- The deep excavation can be designed to provide additional lateral support and thus ensuring a 0.5m distance of separation would be safe.  
In response – Construction work and road works carried out on public roads has to comply with Chapter 8 of the Traffic Signs Manual, which is aimed at reducing risk of harm to workers and the public. To comply with Chapter 8, deep excavations need a safe working area of 1.2m and not 0.5m as proposed.
- Norfolk County Council indicate within their position statement at 30.5.19 that land within the highway boundary, outside the Order limits, **would be available** to extend the tapers of the road widening if required, depending on the final design.  
In response – this is simply not true. The position statement says – “if additional land is required outside the pink land, then the applicant needs to demonstrate that they either have control of that land or that it forms part of the public highway.” To date they have not done either of these.

In the circumstances, the County Council remains of the view that trenchless crossing needs to be employed for the B1149 and that the requirement in the DCO needs to be amended accordingly.

Yours sincerely



Senior Engineer - Highways Development Manager  
for Executive Director for Community and Environmental Services