

CAWSTON PARISH COUNCIL SUBMISSION TO THE SECRETARY OF STATE (SOS) REGARDING THE NORFOLK VANGUARD WIND FARM PLANNING APPLICATION

Cawston Parish Council (CPC) wishes to add this submission to the Secretary of State (SoS) regarding the Norfolk Vanguard (NV) Wind Farm Planning Application, in response to the SoS letter dated 6th December 2019, paragraphs 11-16 on Traffic Movements at Cawston.

Throughout the Examinations of NV, together with those of Hornsea 3 (H3) and Norfolk Boreas (NB) (currently in progress), we have submitted our concerns and suggestions in detail to the respective panels of Inspectors.

In addition to these Applications, we now face further proposals from extensions to Dudgeon and Sheringham Shoal, which are now at the scoping stage.

During the Examinations, H3, NV and NB have all committed to applying a single, common, Highway Intervention Scheme (HIS) for Cawston village. To date, such a scheme has not been approved by Norfolk County Council (NCC) and Broadland District Council (BDC).

Through 2019 a number of versions of a HIS for Cawston were submitted but the most recent one tested still did not satisfy NCC and failed a Road Safety Audit (RSA).

The NB Examination is now in progress, and these matters were discussed at a recent Hearing (ISH 3 on 21st January 2020), when the Applicant suggested that they had a revised scheme to offer “in due course”.

The Inspectors issued Action Points for the Applicant (on behalf of both NV & NB) to publish this scheme, hold a meeting with NCC, BDC and CPC to discuss the scheme together with various alternatives, and to issue a Position Statement for deadline 5 (26th February). This meeting took place on Wednesday 12th Feb; it has a direct relevance to NV.

In the 12th February meeting NB presented the most recent revision of their Highway Intervention Scheme, inherited from H3 via NV. This version removes all the features from previous versions which were claimed to improve pedestrian safety.

The scheme will also bring traffic closer to properties; the changes from the original scheme are so wide ranging that we feel that previous assessments on Noise, Vibration and Air Quality are now irrelevant. We consider that all these studies should be done again, independently, thoroughly and using up to date criteria, if ever a Scheme is accepted by NCC and passes an RSA.

At the meeting the Applicants admitted that previous Highway Intervention Schemes had been based on OS mapping using inaccurate measurements. Apparently the latest Scheme is based on topographic data with accurate road measurements; even then it appears to use track width rather than the full width to indicate HGVs.

This is misleading as wing mirrors will add around 500mm to this width. We do not see why the residents of Cawston should be put at risk because of the lack of rigour in desk based modelling of the successive schemes.

Cawston Parish Council considers that the HIS, even in this latest version, has fatal flaws and is not sufficient to offset any potential harm from NV traffic alone, or in-combination traffic effects arising from the proposed NV project and H3 together in the event that both were granted development consent.

CPC's position remains that it is simply not possible to route any level of construction traffic safely through the village centre. Particular concerns are pedestrian safety, noise and vibration impacts and air quality degradation from stationary traffic, together with the effects on local businesses.

In view of the impact of the NB meeting upon the NV Application, and the wider implications of the number of Applications now in progress, we ask the SoS to pause the NV Application in its present form, and to pause all other current Applications to allow for a Strategic Review to be conducted, to consider all the alternatives for delivery, including an Offshore Ring Main.

The SoS letter of 6th December 2019 asked for responses to a proposed amendment to the DCO, in the following paragraphs:

15. The Secretary of State notes from the above submissions that the Applicant and Norfolk County Council believe there is a reasonable expectation that an appropriate mitigation scheme could be brought forward for traffic movements at Cawston. However, the Secretary of State considers that it is not apparent from exchanges during Examination that these will be sufficient to offset any potential harm from in-combination traffic effects arising from the proposed Norfolk Vanguard project and H3 in the event that both were granted development consent.

16. The Secretary of State is considering whether it would be necessary to introduce an amendment to Requirement 21 of the last version of the ExA's DCO (submitted at Deadline 9) to provide additional mitigation for cumulative impacts that might arise in the event that both the Norfolk Vanguard project and H3 developments are granted consent. The Secretary of State would be grateful for comments from the Applicant, Norfolk County Council and Broadlands District Council on the possible incorporation of the following wording into any development consent order that might be made in respect of the Norfolk Vanguard offshore wind farm:

"In circumstances where the Hornsea Project 3 DCO is made and development of the Hornsea Project 3 commences, and notwithstanding the requirement of sub-paragraph (a) of paragraph (1) above, the traffic management plan shall include, in respect of Link 34 as referred to in the Environmental Statement, revised details of a scheme of traffic mitigation which shall be submitted to, and approved in writing by, the relevant planning authority, in consultation with the highway authority."

We would request the SoS, if minded otherwise to approve the NV Application, to incorporate the suggested wording and we would further ask the SoS to consider adding a requirement for CPC to be included in all consultations.

Cawston Parish Council

27th February 2020