

CAWSTON PARISH COUNCIL DEADLINE 10 SUBMISSION, HORNSEA THREE WINDFARM PLANNING INQUIRY
RESPONSE TO OUTLINE CONSTRUCTION MANAGEMENT PLAN, CONSTRUCTION NOISE AND VIBRATION
ASSESSMENT AND CUMULATIVE LINK IMPACT ASSESSMENT

OUTLINE CONSTRUCTION TRAFFIC MANAGEMENT PLAN

Cawston Parish Council remains opposed to the proposed mitigation scheme as it would result an unacceptable impact upon residential amenity. The applicant's proposal fails to manage and mitigate the considerable impact on our village of their plans for heavy traffic using the B1145.

Cawston Parish Council rejects the Applicant's proposed mitigation measures for the B1145 in Cawston, detailed in the Outline Construction Traffic Management Plan, on the following grounds:

- The mitigation measures fail to reduce the numbers of HGV and Abnormal Indivisible Loads routed through the village on the B1145
- The mitigation measures are technically unworkable because of the number and nature of pinch points in the central part of the village.
- There are a number of locations on the B1145 through the centre of Cawston where highway geometries are too narrow to accommodate HGVs passing an oncoming vehicle.

In *Appendix 27 to Deadline 7 submission - Development of the Cawston Traffic Intervention Scheme* the applicant finally acknowledged that HGVs are unable to pass in the centre of Cawston, an impact Cawston Parish Council has raised at every meeting with the applicant without acknowledgement.

In *Appendix 27* the applicant proposed a mitigation measure to divert HGVs along Chapel Street. This has been rejected by Norfolk County Council with the agreement of the applicant, presumably because they all acknowledge that Chapel Street is an even less suitable route for large numbers of heavy vehicles than the B1145.

The applicant's *Outline Construction Traffic Management Plan Other - Documents PINS Document number APP-176* helpfully suggests management and mitigation measures where:

- The highway geometries are too narrow to accommodate HGVs passing an oncoming vehicle and so shuttle working may be temporarily installed;
- The highway geometries are too narrow to accommodate HGVs passing an oncoming vehicle and so the road may be temporarily made one-way and a local diversion put in place;
- The highway geometries are too narrow to accommodate HGVs passing an oncoming vehicle and so the road may be temporarily closed to through traffic and a local diversion put in place

Cawston Parish Council notes that the applicant has failed to implement any of its own suggested measures in the case of the B1145 in Cawston.

In its *Deadline 9 Submission - Response to further information requested by the Examining Authority*, Norfolk County Council has suggested that the mitigation measures identified by the Applicants for Cawston are technically workable. Cawston's Parish Council believes that the Applicant's mitigation measures are technically unworkable because the measures have considered the pinch points individually rather than considering how traffic encountering the series of pinch points in Cawston will interact.

When HGV traffic on the B1145 attempts to enter Cawston's central area by crossing the railway bridge in the west until it leaves the central area to the east it passes four pinch points. Once opposing HGVs enter the central area of Cawston passing is very difficult or impossible due to the narrow road and parked traffic.

The applicant proposes to narrow the B1145 in the centre of Cawston by widening pavements in an attempt to allow a single HGV to pass pedestrians safely. This measure does not mitigate the problem that the existing highway geometries are too narrow to accommodate HGVs passing an oncoming vehicle. With the proposed increase in traffic of all types the frequency of HGVs meeting each other in the centre of Cawston is increased.

In *Appendix 27 to Deadline 7: Development of the Cawston Traffic Intervention Scheme* the applicant states that *"Contractor HGV drivers would work to industry best practice standards to avoid fatigue."* Sadly, even this applicant lacks the power to ensure that the drivers of other vehicles which encounter their HGVs in the centre of Cawston also work to industry best practice standards. Under existing traffic conditions vehicles mount the pavement in Cawston to negotiate oncoming traffic.

ALTERNATIVE ROUTES

Cawston Parish Council notes that the applicant has belatedly agreed to *"seek to further minimise traffic movements through Cawston through the prioritisation of construction traffic movements along the Heydon Road"*. It is further noted that in its *Deadline 9 Submission - Response to further information requested by the Examining Authority*, Norfolk County Council states that *"If PINS find the proposed mitigation scheme poses an unacceptable impact upon residential amenity, then NCC believes it would be possible to develop an alternative access strategy by increasing the usage of Heydon Road (beyond that already proposed by Hornsea Three) and developing a suitable highway intervention scheme to address current limitations on use"*.

Cawston Parish Council welcomes the applicant's belated acknowledgement of the need to divert traffic from the B1145 and Norfolk County Council's indication that an alternative access strategy can be developed in light of the unacceptable impact upon residential amenity in Cawston of the proposed mitigation scheme.

Cawston Parish Council has received e-mail correspondence from Broadland District Council regarding BDC's statement in respect of Noise and Vibration, to be contained in the applicant's *Statement of Common Ground with Broadland District Council*, to be submitted at Deadline 10.

Broadland District Council have confirmed that *"The statement was made on the assumption that the Highway Authority accept the traffic numbers and traffic management proposals for Cawston and that all the proposed mitigation measures including the use of Heydon Road as an alternative construction access route is maximised to reduce the traffic associated with the Orsted proposal passing through Cawston and also have a reducing effect on the noise and vibration levels."*

At deadline 7 Cawston Parish Council proposed a diversion route for HGV traffic be established on the future Norfolk Vanguard haul road which would bypass the B1145 through Cawston and its two inadequate bridges. We regret that the applicant has not seen fit to engage with Cawston Parish Council on this creative solution to the problem of traffic through Cawston.

CONSTRUCTION NOISE AND VIBRATION ASSESSMENT

In *Appendix 26 - Construction Traffic Noise and Vibration Assessment for Cawston Village* the applicant's noise and vibration survey is based on a very small sample size of just four properties. Significant variation exists between the sites surveyed and sampling was carried out for only a short period. How can the applicant be sure that their sample gives a reliable picture of existing noise and vibration conditions?

The applicant's assessment of the noise levels experienced in Cawston is flawed. The applicant's study goes to great lengths to calculate average noise levels over the course of the day. Cawston Parish Council's view is supported by e-mail correspondence with Broadland District Council's EHO who states *"My view is that the noise report underplays the disturbance from HGVs by smoothing and averaging. I also feel that the applicant could have possibly reduced the number of HGVs travelling through Cawston by rerouting or changes to construction assumptions or a combination of the two."*

The disruptive nature of noise is best described by peak levels and their frequency. Residents will feel vibration in a building, and comment on it, at far lower levels than those needed to cause structural damage. Cawston Parish Council feels that, once again, the applicant is underestimating the impact of their construction traffic on residential amenity in Cawston.

If the applicant is confident in their small data set and the wide-ranging inferences and conclusions based upon it, a sign of goodwill to Cawston residents would be to offer full property condition surveys before and after the project to those living on the B1145 through Cawston.

CUMULATIVE LINK IMPACT ASSESSMENT

In *Appendix 28 to DL7 - Cumulative Link Impact Assessment Relating to Traffic: Oulton and Cawston* The applicant presents the breath-taking cumulative traffic figures for both Hornsea Three and Norfolk Vanguard projects with up to 442 HGV movements a day.

Cawston Parish Council challenges the applicant's assessment of the significance of the impact of the construction works on driver delay.

Cawston Parish Council agrees with the applicant when it acknowledges *"Where highways affected by new development are at, or near, capacity, the traffic associated with new development can cause or add to vehicle delays."*

The applicant then goes on to misuse the Annual Average Daily Traffic figure for an S2 road to claim that the B1145 is below capacity to the extent that construction traffic will not cause delays. The applicant states: *"Considering DMRB Volume 5 Section 1 (TA46/97), the theoretical capacity of a typical S2 standard carriageway, which is the case for both Link Id 89 and Link ID 208 is 13,000 AADT"*

DMRB Volume 5 Section 1 (TA46/97) clearly states *"This Advice Note sets out carriageway standard options for use as starting points in the assessment of new rural trunk roads. **The ranges do not provide any indication of the ultimate flow which a road can carry**" – DMRB author's emphasis.*

The B1145 is not a newly built rural trunk road and its capacity is clearly reduced through Cawston and Reepham. Cawston Parish Council rejects The applicant's assessment that "the sensitivity of these links that are predicted to carry construction traffic, in terms of driver delay, is considered to be low."

Cawston Parish Council has provided evidence to the inquiry that under existing traffic conditions congestion does take place and can cause significant delays to road users. The lack of realistic proposals to mitigate problems of HGVs from opposing directions passing through Cawston increases the risk of congestion, not least for the applicant's traffic.

RESILIENCE

Cawston Parish Council understands that no alternative route has been identified for the applicant's construction traffic flows in the event that the B1145 in Cawston becomes blocked by an event such as a bridge strike, collapse of a Victorian sewer or an accident. It is hard to believe that the applicant would put such a significant project at risk by failing to have a recovery plan in place.

People in Cawston are growing used to being referred to as receptors. Cawston residents have yet to be reassured by the applicant's proposals which combine spurious statistical treatments, much revised schemes avoiding the main issue of traffic numbers and an unwillingness to listen seriously and respond to views from the community.

Poor communication is often blamed when conflicts remain unresolved. In the case of the applicant's proposals for Cawston, communication has indeed been late, and poor, but the main problem has been the unwillingness to listen and engage.

It is hard to escape the conclusion that the village of Cawston and its residents don't matter very much as Hornsea Three seeks to maximise its profits. Perhaps the applicant's view of Cawston is summarised accurately in *Appendix 28 to Deadline 7*. "Both road links are deemed to be of low vulnerability, fully recoverable and low value. The sensitivity of the receptors is therefore, considered to be low. "

Cawston Parish Council

1st April 2019