

Submission on Hornsea 3 for Secretary of State - deadline 14th February 2020

Cawston Parish Council (CPC) wishes to add this submission to the Secretary of State (SoS) regarding the Hornsea Three (H3) Wind Farm Planning Application. Throughout the Examinations of H3, together with those of Norfolk Vanguard (NV) 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 still did not satisfy NCC and failed a Road Safety Audit (RSA).

We note that the SoS letters dated 27th September and 17th December 2019 on H3 referred to questions on offshore matters; however, her letter to NV dated 6th December 2019 raised a number of questions on both onshore and offshore issues, including paragraphs 11-16 on Traffic Movements at Cawston.

We suggest that these paragraphs should apply equally to H3 and request that the SoS takes them into account when arriving at a decision on the H3 application.

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 H3, since H3 is committed to adopt the same HIS in Cawston as NV and NV.

In the 12th February meeting NB presented the most recent revision of their Highway Intervention Scheme, inherited from H3 via NV, which they plan to submit to the NB Inquiry 'in due course'.

Cawston Parish Council considers that the HIS, even in its latest version, presented to the Council on 12th February 2020, has fatal flaws and is not sufficient to offset any potential harm from H3 traffic alone, or in-combination traffic effects arising from the proposed Norfolk Vanguard project and H3 in the event that both were granted development consent.

In view of the impact of the NB meeting upon the H3 Application, and the wider implications of the number of Applications now in progress, we ask the SoS to pause the H3 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.

In her letter on NV, the SoS 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 H3 Application, to consider the inclusion of similar conditions in the H3 DCO.

We would further ask the SoS to consider adding a requirement for CPC to be included in all consultations.

Cawston Parish Council

13th February 2020