

PLANNING ACT 2008 APPLICATION FOR THE HORNSEA THREE OFFSHORE WIND FARM ORDER

Comments on The Secretary of State's proposed amended requirement in respect of the construction traffic management plan in the consent for the Norfolk Vanguard Offshore Wind Farm.

In the "minded to approve" (MtA) letter dated 1st July 2020, the Secretary of State (SoS) included in paragraph 19.14 the following comment:-

"In the event that he grants consent to the Development, the Secretary of State proposes to make the following addition to Requirement 18 of the Order:

"In circumstances where the development of the Norfolk Vanguard project commences, and notwithstanding the requirement of paragraph (1) above, the construction traffic management plan shall include, in respect of Link 89 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 write now to inform the SoS of some disturbing developments since the MtA letter was published, and to ask him to consider strengthening Requirement 18 in a way to ensure the safety of Cawston residents.

In the course of a meeting with Hornsea 3 Project representatives on Thursday 27th August it emerged that Hornsea 3 intend to use the B1145 through Cawston to run 105 escorted Cable Drum abnormal loads, each 3.3 metres wide, on vehicles 18 metres long by 2.9 metres wide, with the return journey being unescorted. This will require either a temporary footway closure in the village centre and/or the removal of all parking spaces on a stretch of Cawston High Street.

It was stated that these proposed closures, on average two or three per day for 11 weeks, have yet to be discussed with Norfolk Highways.

There would be a 15 – 20 minute transit time, which we suggest will cause huge congestion problems, with unavoidable platooning of traffic on the B1145 in both easterly and westerly directions. The avoidance of platooning is of crucial importance to the claimed theoretical viability of the new Highway Intervention Scheme being examined by the Norfolk Boreas ExA.

The traffic mitigation measures proposed by Hornsea Three and examined by that ExA have now been completely revised, and a new HIS has been put forward by Norfolk Boreas, with a commitment by Hornsea Three to adopt it in full. We have raised a number of concerns over the feasibility, practicality and safety of the proposed HIS and the scheme's supposed capacity to mitigate either the disputed or undisputed impacts on the village and its inhabitants, and it is still under examination.

The revised Highway Intervention Scheme proposed for Cawston places great reliance on establishing a 20mph zone to reduce the speed of traffic and impact on Cawston village and its inhabitants. Department for Transport Circular 01/2013, January 2013 6.1.80 states:

"20 mph zones require traffic calming measures (e.g. speed humps, chicanes) or repeater speed limit signing and/or roundel road markings at regular intervals, so that no point within a zone is more than 50 m from such a feature."

The proposed 20mph zone, integral to the Highway Intervention Scheme proposed for Cawston, does not contain any speed humps, chicanes, road narrowing, planting or and other measures to both physically and visually reinforce the nature of the road.

It has been claimed by the various windfarm developers that the reduced number of parked cars in Cawston High Street would fulfil some of the physical and visual reinforcement role of the feature which are not specified

for the village's 20mph zone. These parked cars are now to be removed to allow the passage of abnormal loads, invalidating the already tenuous conclusions of the scheme's Road Safety Audit.

20mph zones are supposed to use traffic calming measures to reduce the adverse impact of motor vehicles on built up areas. Not in Cawston. The principle is that the traffic calming slows vehicles down to speeds below the limit, and in this way the zone becomes 'self-enforcing'.

Paragraph 19.8 of the MtA letter discussed a submission by Cawston residents illustrating the damage and problems that arose when a single such load tried to negotiate the village. At that time the SoS concluded that since this incident took place before the proposed traffic mitigation measures were in place the Hornsea 3 ExA conclusions remained valid.

The cumulative impact on Cawston of the volume and nature of Hornsea 3 construction traffic together with similar traffic for the Norfolk Vanguard, Norfolk Boreas and now Dudgeon Extension wind farm projects are only now becoming clearer and could not be adequately assessed by the ExA. A claim of technical feasibility for the proposed Cawston Highway Intervention Scheme is called into question by revised HGV and abnormal load traffic numbers. The ExA has not had the opportunity to evaluate the practicality or effectiveness of the proposed HIS in avoiding unacceptable cumulative impacts on the village of Cawston from construction traffic.

The third and fourth wind farm cable route applications extend the period of construction impacts and call into question the effectiveness of the agreement on noise and vibration between the Applicant and BDC referred to in paragraph 11.3 above. The proposed increase in construction traffic impacts calls into question the effectiveness of any revised Cawston highways intervention scheme which might have been approved by the relevant planning authority in consultation with the relevant highways authority.

The impact of successive wind farm projects extends the impact of construction traffic on Cawston's residents so those impacts cannot reasonably be regarded as temporary. The village faces bringing up a generation of children who have been unable to leave their homes to walk to the playing field without intimidation from HGVs passing the narrow or non-existent footways and regular traffic chaos as vehicles are unable to pass windfarm HGVs and abnormal loads.

The narrow B1145 through Cawston does not get any wider with each additional wind farm cable route. Additional wind farm cable route projects extending further the time Cawston is subjected to construction traffic

A cornerstone of the new HIS relies on parked cars to create the 20 mph zone required for the safety of residents. It therefore follows that Hornsea Three's proposal to remove parking would completely undermine the HIS. This leaves them only their second option of closing the southern footpath.

This is exactly the situation illustrated in the incident referred to in para 19.8. None of the proposed mitigation measures will address these circumstances, and we fear for the safety of Cawston residents and their property.

Cawston Parish Council
29th September 2020