

CAWSTON PARISH COUNCIL SUBMISSION FOR DEADLINE 3 – COMMENTS ON DEADLINE 2 SUBMISSIONS

INTRODUCTION

Cawston PC wishes to make the following submission for Deadline 3. After an Introduction our comments are listed under the headings set out in the ExA letter of 19th November. In a separate document we discuss the alternative routes issue.

We refer you to the representation [EN010087-001379-DL2] by Prof Tony Barnett of Corpusty PC, in particular his discussion of “Death by data and implicit bias”. This is especially relevant when there is only a short period between deadlines.

We have spent many hours going through the Deadline 2 documents to try to identify the promised improvements by the Applicants to the Cawston Traffic Management Plan. In order to make this a manageable task we have had to be pragmatic, only reviewing documents that appear to have direct relevance and then using a word search to pick out references to Cawston. We realise that, as a result, we may have missed a relevant item; if so, perhaps the Applicant can advise us?

All we can see in the multitude of items submitted by Boreas is a reliance on repeating the plan created by Orsted over several versions and discredited during the Vanguard Inquiry. As an example, a recurring theme is the benefit to residents of promised footway widening. From our meeting with Vattenfall on 22nd November we understand that this has now been completely removed from the plan so we are at a loss to understand how the Applicant still emphasises it as mitigation in so many other documents. As an example, please see [EN010087-001458] the SOCG with Broadland DC.

The one new feature quoted is a suggestion of enhanced street lighting in the High Street. Neither Cawston PC, NCC nor BDC have requested this, so we are puzzled as to why it has appeared.

In their submissions, both Norfolk County Council and Broadland District Council stress that there is no agreed acceptable traffic plan, and therefore the other reassurances sought by the ExA cannot be given. As NCC states *“the Applicant’s position is somewhat misleading”*. One might consider this an understatement.

Another recurring theme in the papers is that adverse impacts are “temporary and reversible”. They then point to the construction period lasting 3 years. This is in an overall period of 8-10 years, with a fourth scheme, Dudgeon/Sheringham Shoal, in prospect; a very elastic definition of “temporary”, let alone “reversible”.

Finally they rely heavily on the B1145 being designated as a Main Distributor with no restriction on HGV traffic. In other words, “We can do what we like”. This is a perfect example of theoretical, desk based, analysis that takes no account of reality on the ground – we challenge the writers to visit Cawston and spend some time at the roadside discussing their analysis with residents.

We would request the ExA to instruct the Applicant to deliver urgently a clear exposition of their current Traffic Plan, as a self-contained document without cross references to other historic files, in a format that can be read and understood by all Interested Parties, including Cawston residents. This would include the provision of a number of paper copies that can be shared with those with no or poor internet access, since that is the only way to fully understand the drawings of the scheme.

We ask that this information be provided by 14th January, at the latest, in order for Interested Parties to prepare for the Hearing on 21st January and the ASI in Cawston on the 23rd. We mention here our experience with Hornsea 3, when a complete revision to the Traffic Plan was handed to us at the door of a Hearing, giving literally no time to analyse or review.

We note that this Examination is due to be completed on 12th May; after the Hearings mentioned above there are two more sets of Hearing dates reserved, in March and April, but only one Open Floor, some distance away in Dereham/Swaffham. The Hornsea 3 Decision is now due on 30th March and it is unlikely that the Vanguard one will be published before this Examination closes.

We request that the ExA considers holding another Open Floor in the Cawston/Oulton area, after the H3 decision date, so that local residents can make known their views on the latest Traffic Plan.

1) Comments on responses to ExA written questions

Norfolk CC – we note the lack of consultation and promised information that NCC report; this mirrors our own experience.

Broadland DC – report a similar lack of information from the Applicants

Boreas – **Not properly assessed, temporary or reversible.**

In their response to questions about listed buildings in Cawston (1.2.02/3) the applicant refers to the Heritage Statement for Cawston Conservation Area in respect of the Traffic Management Measures proposed along the B1145 in Cawston. This position statement refers to damage to the character and appearance of the conservation area and the impact on the ability of people to experience and appreciate the area's heritage assets, not the potential damage to Cawston's listed buildings.

The applicant then goes on to refer to Broadland District Council's general "agreement with the contents of the Applicant's Heritage Assessment as this recognises that there will be temporary damage to the character and appearance of the Conservation Area caused by the increase in Heavy Goods Vehicle (HGV) traffic in the area." Again, this Position Statement does not refer to the construction phase effects on listed buildings in Cawston.

The identification and assessment of impacts upon the assets (or as we receptors in Cawston refer to them, the homes and businesses of people living in Cawston) has not been adequately carried out. The increased potential for collision from an increase in HGV traffic has not been adequately assessed.

A question the applicant might wish to answer is when and how repairs will be made to listed properties in Cawston's conservation area which are temporarily and reversibly damaged by construction traffic, particularly those in the narrowest parts of the B1145 which are most likely to suffer damage. With an increased likelihood of collision damage to buildings on B1145 in Cawston how could any damage be repaired under the applicant's plans?

Any repair or rebuilding work, or even safety measures needed to repair any temporary and reversible damage would need to be carried out whilst the B1145 was being used by the Applicant's HGVs and light vehicle movements. The applicant's plans remain to create a "rural clearway" through the centre of Cawston, which Cawston Parish Council continues to regard as unworkable and dangerous. These plans do not account for the

need to provide scaffolding, access for builders to maintain and repair damage to buildings. Even an oil tanker delivery can cause traffic chaos in the village under present conditions.

In the applicant's response to ExA's question 14.0.8, while trying to justify not using the Haul Road diversion for its HGV traffic away from the B1145 in Cawston, the applicant claims the duration of would be for a period up to 4 years. Four years is a long time for damaged buildings to remain unrepaired.

In framing their response to this problem the applicant might wish to reflect on the fact that their plans to drive hundreds of HGVs through the village of Cawston each day relies on those vehicles being able to pass each other.

It is worthy of note that the Position Statement with Broadland District Council quoted by the applicant continues with "Concerns were raised with respect to footpath widening near Grade II Whitehouse Farm resulting in a narrowing of the carriageway and increasing the risk of potential collision."

In the following sentence, in the smallest typeface available, the applicant goes on to state that "concerns regarding the footpath widening are being reviewed as part of the development of the highway mitigation scheme". Cawston Parish Council presumes this sentence refers to the applicant's recent consultation with CPC representatives where it was suggested that all pathway widening should be removed from the next version of the highway mitigation scheme. The widening of pathways was introduced in the very first version of the highway mitigation scheme in an attempt to protect any pedestrians brave or unfortunate enough to be walking on pathways in Cawston when the applicant's, and other wind farm developers' HGV traffic was trying to pass on the inadequate B1145 in the village.

It may be significant that the applicant has not submitted its latest revision of the highway management plan at deadline 2. This is probably convenient for the applicant at this stage because many of the documents submitted at deadline 2 in support of their answers to the ExA's questions rely on the pavement widening measures proposed in all of the previous versions of the traffic management plan. The statement of Common Ground with Broadland District Council and Broadland District Council's Local Impact Report are both examples of documents where pathway widening underlies the mitigation measures proposed and discussed.

In their response to question 14.0.7 the Applicant relies on the B road status of the B1145 to justify their medium sensitivity assessment. Our original observation was to compare the assessment of Cawston (medium) with Horsford (high). Elsewhere in their responses the Applicant notes that the B1149 in Horsford has the same "Main Distributor" status. **We suggest that the medium sensitivity applied to Cawston has more to do with the relative difficulty and cost of organising an alternative route, a subjective view by the Applicant rather than an objective one.**

2) Comments on written representations

We mention again the representation by Prof. Tony Barnett of Corpusty PC. His comments apply equally to Cawston.

The responses of both NCC and BDC are noted; there is no agreed Traffic Plan for Cawston, until this is produced effects cannot be assessed and all matters remain to be resolved.

After a considerable period of time and at least six attempts by the two Applicant companies to offer an acceptable Plan, together with the Secretary of State's decision to delay Vanguard, citing Traffic in Cawston as a key issue, this surely suggests that such a plan is not possible and alternative approaches must be applied

3) Comments on LIRs

We note that the LIR from **NCC** reiterates that transport issues are still to be resolved. It also comments:-

"The developer still needs to confirm cumulative impacts arising from all three wind farm projects utilising the same access route to the compound at Oulton. The County Council, as LHA is working closely with the applicant on the above matters. In the meantime we wish to raise a holding objection until they have been satisfactorily addressed."

and draw your attention to the comments of **ClIr Peck**.

"Both Vattenfall and Orsted are using sites close to Oulton as staging depots for vehicles and storage of cables, etc. Although Vattenfall will be there for a shorter period of time (two to three years?) compared to Orsted who will be there for entire length of project (8 to 11 years). We must consider the cumulative effect of all the traffic movements on narrow country roads. An application for an anaerobic digester was turned down on Oulton airfield due to Highways Dept objections to the site access and the movement of traffic on the narrow road into the village. Both Vattenfall and Orsted schemes on their own each create more traffic than the digester application. This will not only effect Oulton but also Cawston and other nearby villages, Salle, Heydon, etc. I would like to request NCC Highways object on the same basis that they objected to the digester application."

Turning to the LIR from **Broadland DC**, we find their conclusion (our emphasis)

"5.10 BDC welcomes continued involvement and consultation with the applicant, the Highway Authority and Cawston Parish Council as the number, type and periods of construction traffic activity are clarified and whether alternative routes for the construction traffic can be utilised. Consideration needs to be given to any impacts on heritage assets, highway safety and the residential amenities of occupiers in Cawston including issues of noise, disturbance and vibration arising from the increased heavy goods construction traffic in the village. **Until an acceptable alternative has been secured BDC has serious concerns about the impact of the cumulative significant increase in heavy goods construction traffic in Cawston as a result of up to three nationally significant infrastructure projects**"

4) Implications of the SoS decision on Vanguard

The SoS letter of 6th December, delaying her Decision, includes a number of paragraphs on the issue of Traffic in Cawston. We again draw your attention to para 15

"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."

No new date for a Decision has yet been announced, but we suggest it is unlikely to be before the closure of this Examination. As a result we will not have the opportunity to see the full Inspector's Report in time to comment here. We can only infer the likely contents after reading the SoS letter.

5) Any other Information requested by the ExA

We are not aware of any other requests as at 18/12/19

Cawston Parish Council

18th December 2019