

CAWSTON PARISH COUNCIL'S COMMENTS ON APPENDIX 14.2 NORFOLK VANGUARD OFFSHORE WIND FARM, ALTERNATIVE CONSTRUCTION TRAFFIC ROUTES AT CAWSTON , APPLICANT'S COMMENTS ON DEADLINE 6 WRITTEN SUBMISSIONS: APPENDIX 2

As part of the applicant's Deadline 2 submission, a copy of the document *Alternative Construction Traffic Routes at Cawston, Applicant's Comments on Deadline 6 Written Submissions: Appendix 2*, originally submitted to the Norfolk Vanguard Offshore Wind Farm planning inquiry.

This submission from Cawston Parish Council draws attention to a number of inadequacies, inconsistencies and omissions from the Applicant's submission.

For convenience, references are made to the applicant's report numbering system

Cawston Parish Council has suggested alternative routes for wind farm construction traffic originally submitted to the Norfolk Vanguard Offshore Wind Farm Inquiry at Deadline 5 and to the Norfolk Boreas Offshore Wind Farm Inquiry at Deadline 1.

1.2 ROAD HIERARCHY

The B1145 in Cawston is an ancient route through a village which can be traced back for hundreds of years. The road was created, or more accurately evolved, to its current state long before a road classification system was devised and subsequently applied to the road.

The B1145 in Cawston has not benefited from the spatial planning and traffic management benefits referred to in the applicant's description of the Road Hierarchy.

Considerable evidence has been presented by Cawston Parish Council at Deadline 1 to demonstrate that the B1145 is inadequate as a Main Distributor road and is incapable of safely conveying the greatly increased volumes of HGV traffic generated by multiple wind farm cable route construction projects.

The applicant has deliberately channelled its HGV and other traffic onto the B1145 while disregarding other options.

1.3 PROPOSAL TO DIVERT CONSTRUCTION TRAFFIC OFF THE B1145 AND ALONG THE APPLICANT'S HAUL ROAD

Potential impacts of construction traffic in Cawston would be experienced throughout the entire duration of construction for three, and now possibly more, construction projects. The duration of these successive or contemporaneous projects could amount to seven years or more. 75% of the construction traffic being routed through Cawston is concerned with the delivery and removal of materials to construct and remove the haul road/running track beside the cable ducts.

1.3.1 CONSTRUCTION METHODOLOGY AND INBUILT MITIGATION

In the Applicant's Schedule of Mitigation, most recently submitted on 10th December 2019, they commit to:

Section 24.7.1

Mobilisation Areas

Mobilisation areas will be developed and located close to main A-roads where possible, minimising impacts upon local communities and utilising the most suitable roads.

Mobilisation areas will be located away from Population centres where practical to reduce impact on local communities and population centres.

The applicant's mobilisation area has not been located close to an A-road and by choosing to route their construction traffic through the village of Cawston, rather than along their own haul road, the applicant is failing to minimise their impacts upon local communities or utilising the most suitable roads – in this case the haul road which they are constructing. It is perverse that the materials the applicants propose to haul through Cawston for construction would also be hauled back through Cawston when the haul road is eventually decommissioned.

In section 24.7.1 of the Schedule of Mitigation the applicant commits to:

Construction of an (up to) 6m wide running track with a maximum approximate length of 60km. This would reduce the number of access points required and HGV movements on the local road network.

In Cawston the applicant plans to increase the number of HGV movements on the local road network and to dramatically increase vehicle movements along more sensitive local routes.

The number of truck movements could be drastically reduced by using an alternative construction method such as aluminium trackway.

Construction of the haul road could be planned to take place ahead of other construction work but the applicant appears to be unwilling to consider a change to its schedule.

The method of construction of the haul road could be varied so materials are delivered down the haul road starting from the mobilization base in Oulton and progressing south west, avoiding the need to transport road stone through Cawston. Constructing haul roads in one direction for example towards a coastline at Happisburgh seems to be possible for the applicant.

A haul road used as a diversion route would remain in place for an extended period but every day it remains in place is a day less that the people in Cawston, or "receptors" as we are commonly referred to, experience the impacts of hundreds of HGV movements and other construction traffic through the village.

1.3.2 FURTHER CONSIDERATIONS OF THE USE OF THE CABLE ROUTE TO DIVERT CONSTRUCTION VEHICLES

The applicant appears unwilling to take up this matter with local landowners with whom they are already in negotiation.

The impacts of cable route construction in Cawston will be markedly reduced by constructing the haul road earlier in the programme or by using an alternative and less environmentally destructive haul road construction method such as aluminium trackway.

By drawing attention to, what the applicant states is, a three or four year duration of a running track the extent of the relief which Cawston residents would enjoy by the use of the haul road as a diversion is illustrated clearly.

The applicant claims that some residents of Sygate would experience higher levels of noise for extended durations if the haul road diversion is used. Cawston Parish Council has been concerned to reduce the noise, vibration and air pollution impacts suffered by residents of Sygate and so proposed to the applicant a simple realignment of their cable route to avoid passing close to properties in Sygate. Norfolk Vanguard Deadline 5

submission, Cawston Parish Council Cable Route alignment north of Cawston. The applicant has rejected this proposal but now display faux concern for the welfare of those residents affected by their construction.

Orsted and Vattenfall assert they can work together to regulate traffic numbers on link 34 through Cawston but would also have us believe they would be unable to find a way to share a haul road.

CONCLUSION

It is clear from the applicant's responses that they do not intend to change their proposed construction methods and they do not see a need to change their proposed construction methods, whatever the impacts on the community in Cawston.

The applicant consistently describes their haul road as a running track. Perhaps the repeated use of the term running track in this document is meant to invoke visions of a relatively benign athletics track, unsuitable for transporting thousands of tonnes of aggregates or enormous cable drums. In reality, the applicant's haul road accounts for 75% of the construction traffic being routed through Cawston and, with minor variations to its method of construction, the applicant could be building its own bypass for Cawston, exclusively for the use of its construction traffic.

The applicant has failed to take into account the potential environmental benefits of using alternative construction methods for their haul road bypassing Cawston. By using a slatted metal roadway, rather than an aggregate haul road, the applicant could speed up construction, reduce their demand for aggregates and make carbon dioxide emissions savings in the order of 80%, whilst avoiding thousands of HGV and other traffic movements through Cawston.

In their deadline 2 submission the applicant concludes that upgrading their haul road would "compromise the assessed impact on sensitive watercourses, flood risk, conservation, topsoil management and noise" and that it would "require a 2.8km running track to be in situ for a period of up to 4 years with an increased construction depth to accommodate the increase in HGV flow".

The applicant has failed to consider any mitigation proposals for these impacts. The applicant also fails to balance these impacts against the significant social, economic and environmental impacts which the village of Cawston with its sensitive receptors are expected to endure for a period of up to 4 years, accommodating the increased HGV and other construction traffic which could bypass the village.

In his deadline 2 Written Representation George Freeman MP describes the "widespread feeling amongst the local community, and their legal representation, that Vattenfall UK have considered the entire consultation process as a mere 'box-checking' exercise –going through the motions while never taking seriously the views and concerns being expressed by locals."

The applicant's disregard for and cursory dismissal of this viable alternative route for construction traffic to avoid link 34 is a further example of the disdain with which the legitimate concerns expressed by local people are treated.

Cawston Parish Council continues to regard the applicant's proposed traffic mitigation plan for Cawston as both unacceptable and unworkable. The applicant acknowledges the considerable constraints through Cawston along link 34 and goes on to list a number of management measures which they believe might manage cumulative impacts on the village of Cawston. An obvious way to manage and mitigate the impacts of construction traffic is to divert it away from the village but the applicant has consistently resisted this approach beyond rescheduling

some peak HGV movements, preferring to produce increasingly draconian, unworkable and now conflicting schemes to route thousands of HGVs from east and west through Cawston

A year of “development” of the scheme of traffic mitigation for Cawston has been characterised by repeated “consultations”, new plans emerging minutes before planning inquiries, and a number of slightly amended plans which consistently ignore diversion of traffic.

By Cawston Parish Council’s count we are now being consulted on the sixth revision of the traffic mitigation plan. The plan has not been agreed, indeed Norfolk County Council’s Deadline 1 submission states: “The applicant’s position is somewhat misleading. Whilst it is true to say a Road Safety Audit has been undertaken and reviewed by NCC’s internal auditors the scheme did not pass the audit.”

Also misleading is the repeated reference to “enhanced pedestrian facilities” as a feature of the proposed scheme of mitigation for Cawston. Enhanced pedestrian facilities were at the heart of the proposed scheme of highway mitigation. Cawston Parish Council representatives met with Boreas on Friday 22nd November where the applicant outlined their latest revised plan in which all footway widening in the village would be omitted to make more room for trucks to manoeuvre past each other, pedestrian safety no longer being an impact which requires mitigation.

Curiously the applicant does not seem to have submitted the latest proposals for deadline 1 or as part of their response to the ExA’s questions at deadline 2. Perhaps this is an unpleasant surprise being held back for another time or maybe the applicant likes to waste an afternoon of Cawston Parish Council’s time in a further demonstration of faux consultation.

It is difficult to conclude that the applicant is genuine in its commitment to its own mitigation plan when the applicant has submitted at deadline 2 a large number of appendices which make extensive reference to the importance of widening footways in Cawston to provide pedestrians some measure of safety as large volumes of HGVs and other traffic try to pass each other in the village centre. The Statements of Common Ground and Local Impact Statements with Broadland District Council and Norfolk County Council would also seem to be in need of amendment.

By refusing to use their own haul road for construction traffic the applicant fails in its own commitment to minimise impacts upon local communities and utilising the most suitable roads.

Cawston Parish Council

18th December 2019