

CAWSTON PARISH COUNCIL – RESPONSE TO EXA’S FURTHER WRITTEN QUESTIONS FOR NORFOLK BOREAS DEADLINE 5

Cawston Parish Council submits the responses below for Deadline 5. There are several other areas in the ExA written questions relevant to Cawston that are directed to the Applicant, NCC or BDC; we propose to respond to these at Deadline 6 once the initial responses have been published.

Q2.4.1.1 Construction effects at the Crossover with Hornsea Project Three north of Reepham:

The Applicant’s response to Q1.4.1(1) provides some clarity. In response to Q1.4.1(2), it is stated that the potential overlap of Hornsea Project Three onshore cable works with Scenario 2 duct installation of the proposed development is considered the worst-case scenario.

1. *Could an alternative view be that activities happening at the same time which would reduce the length of time over which the impacts occurred, could be deemed preferable to local communities and therefore the worst-case scenario might be one that extends over the longest time period of time?*

Our focus has been on the peak traffic flows since the early stages of the H3 examination, when peaks were forecast in the 3-400 HGV range. We appreciate that the Applicants have taken some measures to address this, lowering the peak to 239 as a result, but at the cost of extending the periods involved so that the overall number of vehicles changes little.

On this basis it could be suggested that a different worst case scenario is being created, which also undermines the suggestion that the adverse impacts are “temporary but reversible”. The consolidated periods involved are hardly temporary in the generally used sense of the word, and the impacts on local businesses and the quality of life of residents will not be reversible.

CPC’s position remains that there is no compromise level of construction traffic that is feasible in practice and acceptable to residents, due to the impacts on road safety, noise, vibration, air quality and local businesses. An alternative route avoiding Cawston should be developed.

7. Grid connection

Q2.7.0.1 Offshore Ring Main (ORM):

Ofgem, in its recently published “Ofgem decarbonisation programme action plan” [February 2020] undertakes to “explore, with government and industry, options for a more coordinated offshore transmission system to connect offshore wind generation, to achieve a rapid and economic expansion of the offshore network”. As a first step, Ofgem and the electricity system operator will undertake an option assessment for offshore transmission.

1. *Accepting that any decision relating to an ORM will be beyond this Examination’s timeframe, the Applicant to update its response [AS-024, REP4-011], to include options for any future connection into an ORM.*
2. *Do IPs wish to comment further, in the light of Ofgem’s action plan?*

CPC would suggest that the ORM is just one possible solution to the issue of onshore delivery of power from offshore wind farms. We may not have the technical background to compare the alternatives, but we do have

the practical sense to recognise that the current proposals for uncoordinated cable trenches will do irreparable damage to the environment.

We argue that all current applications which propose to dig trenches across East Anglia should be put on hold until a Strategic Review has been carried out and a coordinated system agreed by all stakeholders.

14. Traffic and transportation

14.0 Outline Traffic Management Plan (OTMP)

Q2.14.1.5 Cumulative traffic effects in Cawston:

The Secretary of State's letter [REP3-012, paragraphs 15 and 16] regarding the Norfolk Vanguard scheme, states that the highway mitigations for B1145 Cawston link 34 would not be "sufficient to offset any potential harm from in-combination traffic effects arising from the proposed Norfolk Vanguard project and Hornsea Three in the event that both were granted development consent".

1. *Do all parties agree that the revised Highway Intervention Scheme [REP4-016] would mitigate the cumulative effects of the Proposed Development Scenario 1 (Norfolk Vanguard and Norfolk Boreas) and Hornsea Project Three?*

CPC does not agree with the statement above.

CPC's position remains that it is simply not possible to route any level of construction traffic safely through the village centre. Particular concerns are pedestrian safety, noise and vibration impacts and air quality degradation from stationary traffic, together with the effects on local businesses.

Due to the width of the road being too narrow in places for two large vehicles to pass safely it is inevitable that wing mirrors will overhang the pavement. Observation at the ASIs showed how common it is for larger vehicles actually to mount the pavement as well.

The latest version of the Highway Intervention Scheme removes features from previous versions which were claimed to improve pedestrian safety. It argues that "protection is afforded by parked vehicles", which suggests that pedestrians will be expected to scuttle from vehicle to vehicle like soldiers in a war movie! Woe betide the resident caught on the wrong side of the road, with only a yellow line to hide behind.

The scheme will also bring traffic closer to properties; the changes from the original H3 scheme are so wide ranging that we feel that previous assessments on Noise, Vibration and Air Quality (regardless of what you may think of their reliability) are now irrelevant. We consider that all these studies should be done again, independently, thoroughly and using up to date criteria, if ever a Scheme is accepted by NCC and passes a RSA.

As drawn in the HIS, vehicle tracks suggest the wheelbase of the vehicle is used as a measure of vehicle width. The potential impact of wing mirrors on pedestrians and passing traffic seems to be disregarded.

We attach a photo of five of Norfolk Highways' own gritting fleet showing the problem. It seems that Norfolk Highways, in common with other truck operators in Norfolk, have a problem with wing mirrors being damaged as they pass other vehicles and roadside obstructions. Norfolk Highways have mitigated these impacts by providing wing mirrors with a fetching stainless steel cover.

Pedestrians and cyclists in Cawston do not have the benefit of stainless steel head protection as the wing mirrors of passing traffic overlap the narrow pedestrian footways in the centre of the village - where such footways exist at all.



NORFOLK GRITTER FLEET WITH WING MIRROR PROTECTORS IN PLACE

The HIS makes no provision for large vehicles arriving in Cawston on the B1145 from both east and west with a stream of traffic following, which results in vehicles being unable to manoeuvre in the confines of the centre of Cawston. Such traffic would also be likely to fill the intended passing spaces being designated in the village centre as places where HGVs might be able to pass each other.

Following traffic is not necessarily construction traffic and its drivers are unlikely to be endowed with the magical powers required to see around the corners by the Old Forge and at the Chapel Street junction, which seem to be an essential ability in the selection of the applicant's sub-contractors and permanent staff.

Q2.14.1.7 Traffic movements in Cawston

The Position Statement [REP4-020] to be submitted at Deadline 5 to include a list of all matters that are not yet agreed.

We understand that the Applicant will submit a consolidated Position Statement, but would reiterate here that our position remains that it is simply not possible to route any level of construction traffic safely through the village centre, for the reasons noted above (Q2.14.1.5).

We attended the recent meeting with the Applicant, NCC and BDC. Much the meeting was concerned with the applicant presenting the latest revision of their Highway Intervention Scheme and discussion of its omissions and inadequacies which might be revealed, it was suggested, when it is submitted at Deadline 5.

Limited time was available to discuss the opportunities to divert construction traffic away from Cawston by using alternative routes. Vattenfall presented five options which they had generated, together with their assessment of their own suggestions. As time ran out at the end of the meeting Vattenfall invited those present to “choose the least bad from a set of options we did not like”, presumably later be told “this is the one you chose”, a classic window/kitchen sales trick.

We consider both options 1 (existing scheme) and 5 (one way system using Heydon Road) of those offered to be unacceptable as they continue to route construction traffic through the village. This also applies to option 4 (move M6 to B1149) in its present form.

Option 2(a fully specified bypass) is much more desirable from our point of view, but seems to bring serious administrative problems (of their own making) for the Applicants who claim to have already negotiated detailed agreements with landowners in advance of consent, as does option 3 (“bypass light”).

Therefore, with some reluctance, we would be prepared to consider option 4 as a basis for development of a solution which would need to remove all construction traffic from the centre of Cawston.

Any solution must also include Hornsea 3 and have the potential to apply to future schemes such as the Dudgeon & Sheringham Shoal extensions.

We argue that the best solution would be for all current applications which propose to dig trenches across East Anglia to be put on hold until a Strategic Review has been carried out and a coordinated system agreed by all stakeholders.

At the meeting the Applicants admitted that previous Highway Intervention Schemes had been based on OS mapping using inaccurate measurements. Apparently the latest Scheme is based on topographic data with accurate road measurements; even then it appears to use track width rather than the full width to indicate HGVs.

This is misleading as wing mirrors will add around 500mm to this width. We do not see why the residents of Cawston should be put at risk because of the lack of rigour in desk based modelling of the successive schemes.

Cawston Parish Council

26th February 2020