

NORFOLK BOREAS PLANNING INQUIRY, CAWSTON PARISH COUNCIL SUBMISSION FOR DEADLINE 6.

Cawston Parish Council wishes to submit the following for Deadline 6. This includes comments on D5 documents responding to the ExA's written questions.

CAWSTON CONSERVATION AREA AND LISTED BUILDINGS

We share Broadland District Council's concerns over vibration and repeat our argument that because of the fundamental revisions to the Highway Intervention Scheme, new, comprehensive, studies need to be made on noise, vibration and air quality, using up to date methods and criteria.

We also repeat our suggestion that a programme of full structural surveys should be carried out by the Applicants to reassure residents that no damage is caused by increased traffic.

OUTLINE TRAFFIC MANAGEMENT PLAN (OTMP)

1 - We note from para 88 Table 3.4 that the Applicant has now committed to restricting traffic operations to 0900 to 1800 Monday – Friday, with a break from 1500 – 1600.

However, we maintain our position that the centre of Cawston village is unsuitable for such traffic at any time.

2 - We have also been unable to get a confirmation from Hornsea 3 that they would adhere to these times. Nor have they confirmed that they will not be using abnormal loads to deliver cable, as was stated to us by the Applicant in the 12th February meeting.

3 - Section 5.6 of the OTMP outlines a Speed Monitoring Regime, with surveys at one month, three months and then six monthly. It states:-

“167. If it is found that additional mitigation measures are necessary to reduce speeds through Cawston, these will be proposed and agreed with the relevant stakeholders.”

In our view, this is too little, too late. Given the history of the HIS it is difficult to envisage what new and effective mitigation measures might be discovered that have not already been proposed and rejected. Shutting the stable door after the horse has bolted is never a good approach.

4 - Turning to the subject of 20mph speed limits, which together with a few signs seem to be the Applicants only remaining attempt at addressing pedestrian safety, we asked a number of road safety charities for some advice on their effectiveness.

They all gave similar responses. As an example, Neil Greig, Policy and Research Director of IAM Roadsmart, gave us this information (quoted with permission):-

The evidence on the effectiveness of 20mph limits is mixed. Sign only limits tend to have a limited effect on traffic speed and it is only when physical features (eg road humps) are included that you see a high level of compliance. I believe the average non-compliance with

20mph limits is 87% (<https://www.gov.uk/government/collections/speeds-statistics>) so they are widely ignored!

The DfT's own report questions their success rate - <https://www.gov.uk/government/publications/20-mph-speed-limits-on-roads>

"The evidence available to date shows no significant change in the short term in collisions and casualties, in the majority of the case studies"

This report also states that "The journey speed analysis shows that the median speed has fallen by 0.7mph in residential areas and 0.9mph in city centre areas. Faster drivers have reduced their speed more, with the 85th percentile speed falling by -1.1mph in residential areas and by -1.6mph in city centre areas, based on journey speed data. "

This suggest that speeds will not fall to anywhere near 20mph but there will be a slightly larger reduction at the high end e.g. 29mph drivers will go a few mph slower.

This suggests that the Applicant's reliance on a 20mph speed limit as an effective mitigation is misplaced.

CUMULATIVE TRAFFIC EFFECTS IN CAWSTON:

Our Deadline 5 submission expressed our doubts about the revised Highway Intervention Scheme. Now that we have had the chance to see the Road Safety Audit we would add the following:-

- a) The RSA confirms our points about dangers arising from sending this traffic through the centre of the village, due to the narrow road and pavements.
- b) The brief given to the auditors only includes Boreas traffic numbers. We suggest that the cumulative numbers of H3 and Vanguard/Boreas together might well have caused the auditors to be more emphatic in their conclusions.
- c) In their comments on the RSA the Applicant sets out a summarised baseline position in Appendix C. We have asked the Applicant for more details but had received no response at the time of writing.
- d) At a meeting last year with Norfolk Vanguard, they mentioned that they understood that Hornsea 3 defined all vehicles above 3.5 tonnes as "HGV" in their figures.
- e) If this is the case, then surely it is not consistent and reasonable to compare these numbers directly with the additional traffic, all of which will be larger vehicles.
- f) Para 26 Table 1 in the RSA commentary quotes different (lower) HGV numbers from those previously reported in REP3-003. We also await the Applicant's comments on this.

- g) The latest figures from the Applicant will bring one additional (large) HGV every two minutes, apparently with metronomic timing on a “just in time” schedule.
- h) Walking at 4km per hour (2.5 mph) a pedestrian covers 133 metres in two minutes. This means that every pedestrian can expect to encounter at least one of the Applicant’s HGVs as they walk through the village.
- i) The RSA states *“However, even with these points in mind, the Audit Team still perceive there to be a risk to pedestrians due to the narrowness of the footway and the proximity that HGVs will be to pedestrians.”*
- j) Cawston Parish Council suggests that historical collision figures have no value in determining the additional risk of collision from the applicant’s construction traffic in our village. The nature of collision risk in Cawston is entirely changed by routing large volumes of HGV and other traffic on the B1145 through the village.

The RSA auditors state that *“Without full collision data the Audit Team cannot ascertain the causation factors for these collisions. When considering the use of collision data”*.

The applicant asserts *“Notwithstanding, it is evidenced by the collision (accident) records that the limitations of pedestrian amenity in Cawston are not leading to an inherent pedestrian road safety risk.”*

The applicant appears to disregard Cawston residents’ perception of risk as an impact of their proposed operations. Perception of risk will have a direct impact upon the quality of life of Cawston’s residents for many years under the applicant’s and other developers’ proposals.

- k) On pedestrian risk, the applicant concludes *“Following the evaluation of the key effects that are likely to influence pedestrian risk it is concluded that the likelihood and severity are low and therefore the probability of the perceived pedestrian risk manifesting into an incident is low.”*

In the course of three National Infrastructure Planning Inquiries Cawston Parish Council has sought to keep local residents informed about the proposals and evidence presented, in a form more clearly understood by lay-people. Summarising the applicant’s conclusions on pedestrian risk for Cawston’s residents a simplification might be:

“If you are need to walk along the narrow footway in the centre of Cawston, you might be worried about being hurt by a passing truck, and its unaccountedfor wing mirrors. You shouldn’t worry because if you do get hit by a truck you will probably experience slight or serious injuries rather than being killed by it because the truck will probably be travelling at 20mph.”

Cawston Parish Council’s assessment is that pedestrians’ perception – and their real experience - will be one of extreme danger. Even if they avoid physical injury, quality of life and mental health will suffer.

The geometry of Cawston High Street has remained unchanged for 250 years; if it was ever a “main distributor route”, that would have been for horse drawn traffic. It is time for the applicant to acknowledge this reality and to divert construction traffic away from the B1145 in Cawston. No more time should be wasted trying to “prove” that the next version of the applicant’s ever changing Highway Intervention Scheme could produce effective mitigation for the acknowledged hazards to people and property in the centre of our village.

Cawston Parish Council

5th March 2020