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Subject: Cawston Parish Council - Hearing 17th March
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Attachments: [Boreas Hearing 17 Mar draft.docx](#)

Cawston PC have reviewed the latest Government advice, together with PINS advice on attending the Hearings, and have concluded that it would not be advisable for us to attend in person.

We would suggest that the Hearings this week should be adjourned and rearranged for a later time when all Interested Parties are able to attend safely. We would hope that, in this time of national crisis, the Secretary of State would be prepared to delay the decision process accordingly, and would request the ExA to discuss this with him. Open Public Hearings are an essential part of the examination process.

We will submit our detailed arguments regarding traffic issues around Cawston at the next deadline, but attach here a summary that was prepared for the Hearing. We look forward to listening to the audio of the Hearing (if it should take place) and will add any comments to the written submission.

Apologies for the late notification, but this is a fast changing situation.

Thank you

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BOREAS HEARING 17 MARCH – CAWSTON PC draft comments

We recognise that the Hearing has a full agenda, so we will try to give a brief summary of our points here. More detail and analysis will be included in our written confirmation for Deadline 7.

Firstly, we repeat our **assessment** that the B1145 through Cawston is completely unsuitable for the construction traffic proposed by the wind farm companies. No amount of selective manipulation of figures, averaging and smoothing can hide the basic facts:-

- At various points the road width is too narrow for larger vehicles to pass parked cars without overhanging, or mounting the **narrow pavement**. This is basic arithmetic.
- This has been observed at every one of the ASIs carried out by the three projects (Hornsea 3, Norfolk Vanguard and Boreas).
- It is also the experience of residents on a daily basis.
- Other pinch points are found all along the B1145 from Salle to the B1149, for example at the Salle Beck bends and Marriotts Way bridge to the west of Cawston, near to Aspen Vale and then close to the B1149 roundabout to the east.
- The effect of these points will be convoys of traffic arriving in the village centre from both directions, causing queues of stationary vehicles belching out fumes.

Returning to the latest Highway Intervention Scheme, we wait to hear the Norfolk CC verdict on the Road Safety Audit, but we consider it a clear **failure** as the Audit confirmed all of our observations while the Applicant's comments do not address the core issues.

We also rely on Broadland DC to assess the developments in noise, vibration and air quality from this revised scheme should it ever become accepted by NCC.

We have had a closer look at the baseline figures used in Table 1 and Table 2 in the Applicant's Evaluation of Perceived Pedestrian Risk.

- This uses a 12 hour average of 207 HGVs.
- The definition used here for "HGV" is over 7.5 tonnes, based on the ARX classification scheme. This has 12 classes of vehicle, but here we are concerned with classes 4 to 10, representing a wide range of "HGV".
- ARX define classes 4, 5 and 6 as "medium", with 7 to 10 as "Heavy". We suggest that key points to consider here are weight and the number of axles, which will cause more noise, vibration and damage as they increase.
- Analysis of the average baseline of 207 shows that it is made up of 185 in Class 4 (THE SMALLEST) and 22 others, of which only 9 are in the Heavy groups, 7-10.
- ALL OF THE APPLICANTS VEHICLES WILL BE IN CLASSES 7 TO 10 – "HEAVY". **THIS IS NOT A LIKE FOR LIKE COMPARISON, WHATEVER THE THEORETICAL DEFINITIONS MIGHT SAY.**

We will submit an alternative view of Tables 1 & 2 in our detailed submission.

Talking of perceptions, last weekend we carried out a survey of pedestrians and residents to gauge their views. These are REAL PEOPLE, not theoretical "Receptors" in a model. We asked them to give us their comments about the perceived risk plus their experiences in current traffic conditions, and will report the detailed results in our written submission.

With regard to **item 3b on the Agenda**, we do not feel that discussion should be limited to the 5 options produced by the Applicant. Given the major issues raised not only in Cawston but in other parishes as well, we suggest that “Alternatives” should start from “go back to the drawing board and find a more appropriate route”, and then include all the wider possibilities.

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 Feb 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 suggests that speeds will not fall to anywhere near 20mph but there will be a slightly larger reduction at the high end eg 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:-

- *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.*
- *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.*
- *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.*
- *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.*
- *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.*
- *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.*
- *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.*

- *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.*
- *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."*

Our 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 to recognise this.