

CAWSTON PARISH COUNCIL COMMENTS OS SUBMISSIONS FOR DEADLINES 6 TO 9, NORFOLK BOREAS OFFSHORE WINDFARM , DEADLINE 10.

Cawston PC wishes to submit the following for Deadline 10. These are responses to key points noted in other submissions from Deadlines 6 to 9.

Due to the Covid-19 situation this submission will not be as comprehensive as we would like, but we will try to address the most important issues.

We will also submit a schedule of responses to the Examiners Written Questions, giving as much detail as we are able to compile in the present Covid-19 affected circumstances

Highway Intervention Scheme

We refer back to our comments in our D6 submission (REP6-042), which concluded:

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.

The RSA identifies narrow footways as perceived risk.

The Applicant offers an extensive presentation of data which purports to show why pedestrians are wrong to be frightened of being hit by passing HGVs which are planned to travel so close to the footway that their wing mirrors overlap onto the footway.

Telling people they are wrong, with or without copious diagrams, is rarely an effective way to manage perceptions. Advising pedestrians that if they are hit by a passing truck then they would be an outlier is not particularly helpful.

The Applicant’s response to the danger to pedestrians from close passing HGVs and their wing mirrors has been to propose to install a number of “*Pedestrians in the road ahead*” signs. These signs are appropriate to warn drivers about pedestrians who are forced to walk across the old railway bridge where no footway exists.

However, these signs are an inadequate warning to road-users of the physical and perceived danger to pedestrians in the village centre, not least because the pedestrians identified as at risk on the RSA are on the footway. A “*Please don’t hit pedestrians on the footway*” sign might be more appropriate.

The Applicant supplies further drawings which purport to show how HGVs and other vehicles should be able to pass each other. These drawings show that in many parts of the village the tracks of vehicles pass so close as to be indistinguishable at the screen resolutions available to Cawston Parish Council, demonstrating that in much of the village HGVs are unable to pass safely.

The additional width of vehicles from wing mirrors is not shown in the drawings and even in the areas designated for passing the additional width for two sets of wing mirrors and a safe passing distance between them is not evident.

Cawston Parish Council views the proposed HIS to be flawed and impractical. For the scheme to have any hope of operating as designed a number of conditions need to be satisfied which include:

1. The ability of all HGV drivers to be able to see oncoming traffic around corners on the bend at the railway bridge, on the bend by the Old Forge and on the bend close to White House Farm
2. A requirement for all HGVs, not only the Applicant's and/or Hornsea 3 project HGVs, to arrive at evenly spaced intervals
3. Where two HGVs approach from either East or West they must not have any other road traffic between so they can fit in the proposed system of "passing places". Any train of vehicles longer than the planned "passing space", which is designed for two HGV lengths, will obstruct passing manoeuvres and make gridlock more likely.

Norfolk County Council echoes some of CPC's concerns. The Applicant's Statement of Common Ground with NCC states that:

NCC have raised a concern with regard to driver compliance, drivers may potentially fail to yield at pinch points causing traffic to back up, inducing unacceptable delays.

In their letter of 27th April (REP8-036) NCC also reiterate their concerns that the HIS could fail

1. If parking occurs outside the designated parking areas
2. Traffic fails to yield at the correct points
3. Or if traffic speeds are much higher than 20mph.

Residents of Cawston already see all three of these conditions on a daily basis, and our D6 submission (REP6-042) noted official Government sources showing that 20mph limits have a low compliance factor. The Applicant seems to have no practical solution should the scheme fail.

Drivers' being unable to see oncoming traffic around corners is a problem that even "intensified correction measures" might find it difficult to overcome.

The Applicant does not have the ability to regulate the orderly arrival of traffic, in numbers and proportions, which the Applicant believes would make their HIS workable. The Applicant seems to disregard the other vehicles which try to use the B1145, whose drivers may not possess the semi-magical qualities ascribed to the Applicant's contractors, whoever they may appoint.

The Applicant suggests "intensifying monitoring regime" and then "intensifying correction measures" as a solution to driver compliance issues. Such intensified correction measures" have not been described. It may be enlightening for inspectors to hear that in one of CPC's meetings with the Applicant they suggested that if the scheme proved not to be workable the Applicant would seek to remove more, or all, parking from the village centre to produce a "rural" clearway, to be enforced by intensive Civil Enforcement so that HGVs might pass each other.

By failing to publish such proposals it is not possible for the Examination to assess what Cawston Parish Council would describe as the calamitous impact of such action on local businesses and the disruption imposed on residents who park outside their homes on the High Street.

The presence of parked vehicles on sections of the B1145 in Cawston is cited as a protection to pedestrians in the Road Safety Audit. Removing parking when added to the removal of any footway widening in the village,

as originally proposed by the Applicant as a road safety measure, would show a reckless disregard for the safety of pedestrians.

The presence of parked vehicles on the High Street has been acknowledged by all parties to help reduce the speed of traffic in the centre of Cawston. The Road Safety Audit has identified traffic speeds above 20mph as a risk of failure for the HIS.

Alternative Routes

We note that NCC's letter dated 27th April states that while they have no technical objection to the HIS (our emphasis) it is no longer their preferred solution.

NCCs letter shows their clear preference for Option 2, and we are in full agreement with that. Cawston residents should not be the victims of the Applicant's failure to use accurate data and carry out proper surveys when drawing up its plans.

Cawston Parish Council would like to re-emphasise that the Applicant has provided details of a viable alternative route for all Windfarm Construction Traffic avoiding the centre of Cawston, the weak railway bridge and inadequate bridge across Salle Beck. Unsurprisingly this route, originally proposed by Cawston Parish Council, is the preferred diversionary route for both Norfolk County Council and Cawston Parish Council.

The preferred diversionary route, designated Option 2 by the Applicant in the meeting convened by the ExA between the County District and Parish Councils in February, follows the line of the Applicant's cable route from Oulton to Salle. At that meeting the Applicant made clear that it did not favour Option 2, mainly for reasons of expense and the inconvenience of reopening negotiations with landowners.

The Applicant's inconvenience from having to implement Option 2 results from their overconfidence that their plans would emerge unaltered by the National Infrastructure Planning process. Pre-judging the application's outcome is not a justification for the Applicant trying to force through an unworkable and destructive plan for construction traffic in Cawston. Sadly, it is another display of the inflexibility and arrogance with which the Applicant regards local concerns and objections.

On reading the Applicant's Responses (REP7-017) to the ExA 3rd round of written questions, we are forced to ask why they proposed Options 2, 3, and 4 as Alternatives at the meeting with IPs in February when in this document they say they are "unworkable".

The end of this meeting was notable for the Applicant unveiling a Position Statement which had been prepared in advance; and which none of the other parties then accepted. It seems we spent many hours, in good faith, preparing for and attending a meeting to discuss alternatives which the Applicant had themselves drawn up and yet considered "unworkable".

This shows a complete lack of respect both to the ExA, who requested that the meeting be arranged, and for other IPs, who attended the meeting in good faith to seek a viable alternative route, other than driving construction traffic through Cawston..

HGV numbers

The ARX definition of HGV, used by the Applicant, includes all vehicles over 7.5 tonnes. Analysis of the "baseline" number of HGVs used by the Applicant shows that it is largely made up of medium size vehicles, whereas the Applicant's HGVs will all be in the large category.

This imbalance will skew any average based calculations. Points to consider here include weight and the number of axles, which will cause more noise, vibration and damage as they increase.

An alternative view of the Applicants Tables 1 & 2 looks like this:-

	BASELINE	BOREAS Scen. 2 peak		Consolidated H3 and Boreas peak	
Class	12 hour	12 hour	% increase	12 hour	% increase
Class 4	185	0		0	
Medium	13	0		0	
Heavy	9	112	1144%	239	2556%
Total	207	319	54%	446	115%

In our research we also came across the Government website *roadtraffic.dft.gov.uk*, which includes counts of the daily average traffic flow at various sites. Some have been taken more frequently than others, but it does give the following data:-

Ref.	Location	Year	All motor vehicles	Heavy goods vehicles
941732	B1145 Cawston	2008	3459	111
941768	B1145Reepham	2008	3216	59
941768	B1145Reepham	2018	2880	53

There is no data for Cawston in 2018, but this suggests that the flow of HGVs (using the ARX definition) in Reepham, the next town to Cawston on the B1145, has stayed about the same, whereas the HGV flow through Cawston has already increased from 111 (daily) in 2008 to the Baseline figure of 207 (12 hour) in 2019.

This is an increase of 86%, and the Applicants peak 12 hour combined Boreas and H3 at 446 would represent an **increase of 302%** over the 2008 daily figure.

No wonder residents are appalled at the prospect.

Noise, Vibration & Air Quality

The Applicants "Note" (REP8-028) on these matters finds that impacts are not significant and no mitigation is necessary. This does not come as a surprise to those who have spent several years challenging such desk-based modelling assumptions across many issues and trying to introduce a sense of reality and rational assessment.

While we may not have the technical or financial resources to conduct an independent analysis of these calculations we can assure the ExA that these conclusions are at odds with the daily real life experiences of residents, who are only too well aware how models can be set up to provide the results that the author wants to show.

For example:

1. The Applicant assesses Cawston as merely “medium sensitivity” in its calculations.
2. They use a basic noise calculation that compares relative not absolute levels.
3. Calculations use 18 hour averages
4. The calculations still use H3’s questionable base data
5. The conclusions rely on strict 20 mph adherence, when all official evidence tells us that speed will not be reduced to anything like 20mph

The model seems to be based on different working hours from those now proposed and to assume idling only when two of the Applicants HGVs are approaching each other – the reality is that an HGV approaching any other vehicle, including non-wind farm HGVs, will have to stop.

It does not take account of the effects of braking and acceleration from rest when HGVs have stopped at a passing place, their noise in moving away may be greater than for a constant speed vehicle passing. Apparently there are no standards for calculating or assessing noise from accelerating traffic. Just because you don’t have a measure for it doesn’t mean it doesn’t exist or have impact on “receptors”.

There is no assessment of the impact of non HGV wind farm traffic, some 407 movements per day of staff going to and from work. These will be clustered in a short period before or after the working day, so there could be 200+ movements through Cawston around 0630-0645 and again 1915-1930. This will have a significant impact

Cawston Parish Council’s Residents Survey

This was submitted as REP7-037. The Applicants response (REP9-014) is intriguing. It concludes:-

“It appears from the residents’ responses that the scope of the Highway Intervention Scheme (HIS) and overall package of measures to mitigate the issues raised are not clearly understood by residents”.

The Applicant’s analysis identifies a number of “general themes”:

- *Pedestrian conflict with vehicles*
- *High speeds through Cawston Village Centre*
- *Cars parking on pavements; and*
- *Risk to children walking to/from school.*

This is an interesting selection, as “cars parking on pavements” is certainly not a theme whereas narrow footpaths and danger from wing mirrors are recurring issues, along with the dangers from traffic driving on the pavement, as witnessed at successive ASIs.

We might paraphrase the Applicants conclusion in our own:-

“It appears from the Applicants response that that the real dangers arising from its latest HIS, as identified by residents and noted in its own RSA, are still not clearly understood by the Applicants themselves.”

Requests that the Examination Deadline be extended; submissions from non-registered parties.

We mention in passing the number of almost identical letters published recently from non-registered parties, from as far away as Stirling and Leicester, who have previously taken no part in the Examination process.

These have clearly been based on a template provided to the writers; here we merely ask why someone would feel it necessary to do this, and what pressure was put on the writers to make these submissions?

What is it about scrutiny in a fair and transparent process that they are so worried about?

Cawston Parish Council

6th May 2020