

Oral submission to Open Floor Hearing 2nd July 2020, Simon Court on behalf of Cawston Parish Council

I propose to cover problems with the most recent version of the Highway Intervention Scheme for Cawston, cumulative impacts and the preferred alternative route.

Vattenfall's beautifully presented corporate website claims that they are constantly striving to better understand and manage their impact, maximising the positive and minimising the negative. They go on to claim to be achieving these laudable outcomes through actively engaging with stakeholders "We aim to understand their expectations of us" they say.

In Cawston perhaps they weren't listening. Vattenfall appear not to understand, or perhaps choose to disregard, our expectations of them – to conduct their business safely and to minimise their impact on our village community.

Vattenfall claim to have regularly engaged with all parties, including local communities, to make appropriate changes to their plans. But in Cawston Parish Council's experience changes to their plans are the thing Vattenfall have not been prepared to do, beyond massaging peak HGV traffic flows to prolong the misery and disruption for our residents, or receptors as we are now getting used to being described.

We have certainly sat in many meetings with Vattenfall representatives when the numerous revisions of their Highway Intervention Scheme have been presented, starting with Hornsea 3:

There was the one with widening of footways to enhance pedestrian safety – that was a vital feature to mitigate danger to pedestrians and damage to our heritage.

Then there was the version with footway widening removed because it is safer for pedestrians that the road is wider.

There was the version after they properly measured the width of the road and calculated they could theoretically get trucks past each other in two places, as long as there is no other traffic about, and their mirrors only protrude 8 inches – they obviously have not seen the impressively wide stainless steel mirror guards used by many truck operators in Norfolk, including by Norfolk Highways.

We are now onto the scheme where, amongst other features, additional road signs will protect pedestrians walking on the footway from mirror strikes, there are now to be surveillance cameras in the centre of the village and the promise, or is that a threat, of increased parking enforcement. In the Road Safety Audit, parked cars contributed some protection to pedestrians from passing traffic. Enhanced parking enforcement will remove that protection.

The latest scheme relies on the applicant's construction traffic, and other road users not under the applicant's control, arriving in Cawston conveniently timed and suitably spaced. If no more than two HGVs, with no other vehicles between them, meet another HGV at one of the two designated HGV passing spaces, they might be able to squeeze pass each other.

The applicant proposes to time their HGV movements through Cawston with military precision but a single cyclist, bus or tractor will cause a concentration of traffic, as will the pinch points on the B1145 east and west of the village.

Missing from the latest scheme appears to be the management and integration of the significant number of abnormal loads which have been a feature of the Hornsea 3 construction project.

If this scheme is pushed through we fear it will soon prove to be unworkable because of the unrealistic assumptions it is based on as well as the negative response it is likely to evoke from a community who perceive their interests have been overridden by foreign owned multinationals. In these circumstances the three, or maybe four wind farm projects will be urgently seeking variations to their plans with further negative impacts on our community and local environment.

Cumulative impacts continue to accumulate. Last week our councillors were invited to consultation on Equinor's Sheringham Shoal Dudgeon Extension, the fourth wind farm cable route passing Cawston. They plan to start in 2022 and who knows what cumulative impacts their construction traffic might have with the applicant's and other projects as they progress.

In the spirit of maximising the positive and minimising the negative, the positive news is that Vattenfall has an alternative to trying to force it's construction traffic through Cawston. They still can meet Cawston Parish Council's expectation that they should minimise their negative impact on our village.

Simon Court

Cawston Parish Council 02/07/2020

**Oral submission to Norfolk Boreas Planning Inquiry Open Floor Hearing 16th July 2020,
Simon Court on behalf of Cawston Parish Council.**

I would like to speak about the impact on pedestrian amenity in the village, aspects of the Cawston Highway Intervention Scheme and the Outline Traffic Management Plan

In the Road Safety Audit , the plans for Cawston led the Auditor to raise continuing concerns over pedestrian amenity impact, I quote:

However, even with these points in mind, the Audit Team still perceives there to be a risk to pedestrians due to the narrowness of the footway and the proximity that HGVs will be to pedestrians.

The applicant ascribes the risk to pedestrians to existing “indiscriminate” parking on the High Street and then proposes reducing parking in some parts of the High Street and by taking a metre of the triangle of parking at the end of Chapel Street. This, we are told will have no effect on the number of vehicles which can park there – presumably vehicles will somehow park closer together.

The perceived risk of injury to pedestrians from passing HGVs is discussed by the applicant in their response to the Road Safety Audit.

Cawston residents’ perception of injury risk will be informed, not by Vattenfall’s perception, but by the applicant’s plans for construction traffic and its cumulative impact when combined with the construction traffic of the other projects. The perception of risk is also informed by the way the applicant has dismissed the viable alternative route and their apparent determination to drive their HGVs through at whatever cost.

The applicant analysed recent accident figures for the High Street and concluded that the likelihood of pedestrian injury from passing HGVs can be discounted because records show it hasn’t happened up to now. Our response to that conclusion is that the road has not had to carry the additional traffic from three wind farm construction projects up to now. It is the potential effect of the additional traffic which should be taken into account.

The applicant goes on to make some comments about the severity of pedestrian casualties, illustrating their points with a graph comparing the cumulative percentage of severity at different impact speeds and in their analysis I quote

“It can be observed from Insert 1 that there is a significant reduction in the severity of pedestrian casualties when comparing 20mph impacts to 30mph impacts. it is concluded that the introduction of a 20mph speed limit would have a positive impact on the severity of pedestrian risk.” Positive impact was the applicant’s own unfortunate choice of words.

This observation offers no comfort to pedestrians walking to the shop in Cawston. Being hit on the head by a stainless steel mirror cover will do a lot of damage at 20mph, or even at 10mph. It would be of little consolation to hear that it would have been even worse if the truck was going faster.

Despite the reliance on the 20mph speed limits the applicant's Highway Intervention Scheme is designed around, there are no provisions for the enforcement of a 20mph speed limit.

Government research into the effectiveness of 20 miles per hour road speed limits suggests there is not enough evidence to conclude that there has been a significant change in collisions and casualties following the introduction of 20mph limits in residential areas.

Communication is regularly referred to in the HIS, RSA and OTMP. The applicant claims they will ensure effective and open communication with local residents and businesses that may be affected by noise or other amenity aspects caused by the construction works. Communication is a two way process which needs to include listening, not just telling us what you are going to do. Our experience has been that the applicant ignores or rejects suggestions it does not want to hear. They have a very long way to go to ensure effective and open communication with the local community whose cooperation and forbearance they require, and will rely upon, to successfully complete their project.

Interaction with Hornsea 3 is another area for concern for Cawston Parish Council. Hornsea Three has committed to adopting a Cawston Highway Intervention Scheme and to ongoing engagement to implement the scheme post-consent but this engagement is not taking place at the moment. Hornsea 3 has failed to respond to our enquiries about their Abnormal Indivisible Loads, a feature of their project about which the Cawston Highway Intervention Scheme is silent.

It is Cawston Parish Council's view that the proposed Highway Intervention Scheme, even in its most recent form, is flawed in its approach and fails in its stated aim to provide adequate road space for HGVs to traverse the High Street without the requirement to mount or project over the pavement.

The potential for two-way movement for construction traffic through Cawston is claimed to be demonstrated by the applicant's swept path analysis modelling. This modelling is represented in maps which purport to show where large tipper trucks or articulated vehicles may pass in the central part of Cawston. Pages 88 to 90 in Part 1 of Appendices to the Outline Traffic Management Plan.

Even in the wider areas of Cawston High Street the gap between the tracks plotted is hardly distinguishable. The overall width of vehicles used in the swept path analysis are 2.495 m

for the Large Tipper and 2.55metres for the Articulated lorry. The applicant suggests the additional width of mirrors is 80mm although our research, with a tape measure, suggests that 350mm is typical of the mirrors fitted to trucks in this area.

The gap between the tracks of passing vehicles is difficult to determine from the plans. A safe passing distance is not stated in the plans. The applicant seems to be expect all drivers of vehicles in Cawston will possess the above average driving skill an millimetre accuracy they attribute to their drivers to enable them to pass safely.

An underlying concept of the Highway Intervention Scheme is to avoid HGV conflicts with other HGVs and other vehicles in the village centre. HGVs need to find their way to two designated passing spaces on the High Street. HGV to HGV passing is not possible in other places on the High Street.

The applicant plans to restrict the release of HGVs onto link 34 in an attempt to avoid platooning. Presumably this is planned for journeys between their Oulton and Salle bases but would be even less likely to succeed with vehicles travelling from further away. The scheme fails to control non-windfarm related traffic and it would be reasonable to presume a mix of HGVs and other vehicles would approach Cawston from both east and west. The applicant has failed to Identify safe areas on the B1145 to pull over to reduce the effect of slow-moving platoons of vehicles as indicated in their enhanced TMP Measures.

I would like to outline just one of the circumstances when the HIS plan can fail.

The HIS designates a passing space at the junction of Booton Lane, labelled on the swept path plan as *No conflict when third large tipper in queue is stationary*. This boast relies on no other vehicle finding its way between the three tippers, an unlikely scenario since other vehicles do use the B1145 and the Traffic Management Plan suggests that HGVs will be released at spacing to avoid platooning.

In the event that one tipper travelling from the west is followed by say a couple of cars and a van and they can find their way across Salle Beck Bridge, over the old railway bridge avoiding pedestrians in the road and eventually arrive at the HGV passing space at the junction with Booton Lane then a second tipper, and any other following traffic, would find itself waiting, not in the designated passing place, but in what is marked on the swept path analysis plan as a potential *two way Large Tipper HGV Conflict Zone*, effectively barring progress of all but the narrowest oncoming vehicles travelling from the east. If the second tipper has collected traffic behind, likely in a 20mph zone, there would be no opportunity to enable approaching traffic to pass. A third tipper following may well be stuck in a stream of traffic on the old railway bridge, also obstructing oncoming traffic.

The applicant's forward visibility plan has green lines marked from the junction with Booton Lane which show a line of 50 metres which is to be kept clear at all times to restrict HGV conflicts. These lines can only provide visibility when there is no traffic ahead of the HGV obscuring the view. 50 metres is not a great distance for an HGV to stop from 20mph. The stopping distance for a car at 20mph is 12 metres and even longer for an HGV, by which time the vehicle will come to rest in the HGV conflict zone, making it difficult or impossible for oncoming traffic, including the applicant's HGVs or even the service bus to pass.

It is proposed to review operation of the HIS after three months of monitoring using remote cameras. This is much too long a period.

Cawston Parish Council does not agree with Norfolk County Council that the Highway Intervention Scheme is technically feasible and wish to remind the applicant that a viable alternative route, their option 2, would enable most construction traffic to avoid the B1145 in Cawston.

In their Traffic Management Plan the applicant seeks to control HGV numbers through a booking system and HGVs arriving outside of their allocated time slot will be refused access and turned away. For vehicles travelling through Cawston to Salle we wonder where the trucks will be sent away to. They are not allowed to go through Reepham so presumably will be sent back through Cawston, adding to congestion and contributing to the delay "pinch points" the booking system seeks to avoid.

In his recent decision on the two other Wind Farm applications the Secretary of State has acknowledged the adverse impact during construction and operation, particularly in relation to cumulative traffic impacts at Cawston but has decided that the overall benefits of the proposed Development outweighed the harm."

This is a false dichotomy, reducing the decision down to just two possibilities by ignoring the option of using the haul road as a diversion route for construction traffic. The haul road alternative, the preferred route for both Norfolk County Council and Broadland District Council, whilst rejected by the applicant, presumably on the grounds of cost, is the third option which would enable the project to be completed and the nation to derive the benefits of additional wind power without the adverse impacts in Cawston which the Secretary of State acknowledges.

Simon Court

Cawston Parish Council 16/07/2020