

**Cawston Parish Council, Norfolk Boreas Offshore Wind Farm Inquiry, Deadline 13 submission.**

Cawston Parish Council wishes to make the following submission at Deadline 13. This includes points made in oral contributions at the Open Floor Hearings on 2<sup>nd</sup> (OFH 2) and 16<sup>th</sup> July (OFH 3c) and a report on our meeting with Vattenfall on 21<sup>st</sup> July.

We would like to thank the Inspectors for arranging the hearings, and the Case Team for organising the logistics. We also suggest that the number of responses from our residents shows the depth of feeling in the village.

When we registered for OFH 2 we expected to be discussing the Secretary of State's decisions on Hornsea 3 and Norfolk Vanguard, which have a direct effect on this proposal. The decisions were delayed and finally released late on the 1<sup>st</sup> July.

We note that in both cases the ExA recommended rejection; however, the Sec of State decided to approve Norfolk Vanguard (with some Requirements) and issue a "Minded to Approve" letter on Hornsea 3, with similar Requirements, the final decision being delayed until December.

The Requirement in both cases is that they produce *"a revised scheme of traffic mitigation which shall be submitted to, and approved in writing by, the relevant planning authority, in consultation with the highway authority"*

In the case of Vanguard, there is a further requirement, that if the Boreas DCO is made the Vanguard plan must be consistent with the Boreas OTMP ... *"but only to the extent that such mitigation is capable of being accommodated within the Order limits and does not give rise to any materially new or materially different environmental effects from those assessed in the environmental statement"*.

We suggest that this may leave a muddled situation. (This was also discussed in the VF meeting, see below). The Highway Intervention scheme that was in the Vanguard submissions has now been superseded by the latest, fundamentally revised one, currently being considered in Boreas. We have been told that H3, NV and Boreas are committed to apply the final version of the scheme, should an acceptable one be developed, but now we sense that we could potentially be faced with a several different approaches, none of which will work.

We need a clear and unequivocal commitment from all three schemes that they will work with us in developing a comprehensive final version of traffic mitigation around Cawston which is acceptable to all parties. For example, on abnormal loads H3 will not confirm what Vattenfall told us – that they won't now be using AILs – and there is no mention of AILs in any HIS proposal. Our experience so far is worrying ...

Like other communities, we have tried to engage with both Vattenfall and Orsted in good faith, with goodwill and flexibility in trying to flag up problems, suggest alternatives and find practical solutions.

We have been met with intransigence, delay, and threats of enforcement action. The meeting with councils in February, requested by the ExA, to discuss alternative routes was yet another example of this "fake consultation", which has been seen throughout the four year process; a box ticking exercise when they had no intention of taking any notice of the outcome.

As George Freeman MP, in his letter of 23rd April, states ... *"the prevailing view that there seems to have been little, if any, regard paid by Vattenfall UK to the views and concerns expressed by our local communities"*.

Vattenfall's reaction, both to the numerous requests for an extension to the process due to the Covid crisis and the subsequent Sec of State decision to extend, was troubling, with comments like *"the offshore wind industry will be left wondering about the government's intentions for this sector"*.

Vattenfall clearly considers the interests and views of local communities and individuals to be unimportant. There are still fundamental points that have not been resolved and which could have grave consequences for our community. While we strongly support renewable energy in principle we cannot support this badly conceived traffic management scheme which will have a disastrous and permanent effect on the safety and livelihoods of our residents, when better alternatives are available.

The Vanguard ExA Recommendation Report includes the following (our emphasis):-

4.7.64-5. The Vanguard ExA concluded that, unopposed, an HGV would take 46 seconds to traverse the centre of Cawston. This increases to 65 seconds if it had to stop once and 104 seconds if stopped twice, with the potential for further increase if vehicles are in platoons, concluding *“The likelihood and scope for delays and blockages is significant given the constant flow of HGV vehicles and the numbers involved”*.

4.7.66. *“The ExA is highly sceptical that the Highway Mitigation Scheme as it currently stands would satisfactorily mitigate the combined effects of the NV and H3 Projects so as not to cause material harm to highway safety”*.

4.7.72 *“... the concerns of the ExA are such that it disagrees with NCC and confirms that material revisions to the mitigation scheme are required, including the further reduction in HGV numbers. The ExA concludes that the current mitigation measures contained within the latest OTMP would be insufficient to address those concerns”*

While in its paragraph 4.7.135 the ExA *“further concluded that there is a reasonable expectation that a mitigation scheme for link 34 could be devised”*, we suggest it is worth looking at the current HIS in the light of these conclusions. Are there material revisions which improve the scheme, and have the HGV numbers been further reduced? Has that reasonable expectation been met? We suggest it has not.

The new scheme was only reluctantly published at ExA insistence after VF said it would be done *“in due course”*, which suggests they were trying to delay for as long as possible. On HGV numbers the only suggestion of reducing them is on review after the scheme fails, while NCC’s verdict is that only reducing numbers has any effect.

The applicant’s new Highway Intervention Scheme fails in its 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.

Even in the wider areas of the High Street the gap between the tracks plotted are hardly distinguishable. The overall widths of vehicles used in the swept path analysis are 2.495 m for the Large Tipper and 2.55metres for the articulated lorry. Track width of the lorries are stated as 2.471 metres and 2.5metres.

The applicant has suggested that the additional width of mirrors is an additional 80mm although our research with a tape measure suggests that 350mm is more representative of the mirrors fitted to common trucks in this area.

At our meeting VF seemed to accept a maximum HGV width could be 3.05 overall but said that our comment that cars might be 2.15 m seemed exceptional. Having checked, we find that there is a small discrepancy; Google gives the following information

Honda CRV	2.117
Volvo XC60	2.117
Saab 93	2.037

These are all cars owned by residents and parked regularly. A couple of residents have businesses and often park light/medium vans, which are wider. All this is in a road that can be just 5.0 metres wide in places, and takes no account of getting in and out of the car, loading children, etc.

The applicant states that truck mirrors will be above car mirror level, presumably making it easier to pass. Leaving just 250mm for vehicles to pass safely seems a very small distance. The applicant declined to suggest a safe passing distance for vehicles when asked. One wonders just how close drivers are expected to allow, and how the applicant can ensure wing mirrors do not encroach above the footway?

The applicant's other suggestion was that wing mirrors could be folded back; this seems preposterous in the real world. At this late stage they are still in denial.

The swept path analysis appears to have been conducted at the track width without mirrors. The space allowed between passing vehicles is difficult to determine viewed at any scale. The applicant seems to be content that all drivers in any vehicle in Cawston will possess the above average driving skill they attribute to their drivers.

The Highway Intervention Scheme seems to rely on HGVs finding their way to the two designed passing spaces as HGV to HGV passing is not possible in other areas of the High Street.

#### **HGV Conflicts**

The applicant has devised a plan 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. This 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.

#### An example of circumstances in which the scheme will not work.

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. The Applicant claims that an HGV stopping distance at 20mph is 26.7 metres

The Highway Code states "In wet weather, stopping distances will be at least double those required for stopping on dry roads". Double 26.7 is 53.4m. Clearly the distances would increase exponentially at the higher speeds which can be expected on the actual road, outside the computer model.

### **Communication**

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.

Until now our experience is that the applicant ignores or rejects constructive 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 to successfully complete their project. Communication is a two way process which needs to include listening and, if genuine, the possibility of action.

### **Interaction with Hornsea 3**

Note that Hornsea Three is committed to adopting a Cawston Highway Intervention Scheme and is committed to ongoing engagement with Norfolk Vanguard Limited, Norfolk Boreas Limited, Broadland District Council, Cawston Parish Council and Norfolk County Council to implement the Cawston Highway Intervention Scheme design post-consent. Sadly this engagement with Cawston Parish Council is not taking place at the moment as Hornsea 3 has failed to respond to our enquiries about Abnormal Indivisible Loads which are a feature of their project and about which the Cawston Highway Intervention Scheme is silent.

### **Meeting with the applicant on 21<sup>st</sup> July**

Several Parish Councillors and residents attended this meeting. VF were able to comment on a number of points:-

- All three projects, Hornsea 3, Vanguard and Boreas, have committed to implementing the most recent scheme which is currently being examined in Boreas.
- This commitment should include working hours and exclusion of abnormal loads
- NCC has said the scheme is “technically possible”, although it is not their preferred option.
- In Vattenfall’s opinion Options 2, 3 & 4 would not be possible under the Vanguard DCO limits
- Because Requirement 21 (5) commits Norfolk Boreas and Norfolk Vanguard to the same HIS, to the extent that it can be accommodated within the Order limits and environmental Statements. As such, the alternative options 2, 3 and 4 would not be possible within the Norfolk Vanguard DCO limits.

Cawston Parish Council confirmed their understanding of the applicant’s interpretation of the Secretary of State’s decision. To be clear, the applicant’s explanation is not an interpretation which Cawston Parish Council accepts or agrees with.

The applicant made it clear that of the diversion routes proposed at the meeting of 12<sup>th</sup> February, options 2, 3 & 4 were never real alternatives from their point of view, which begs the question of why they raised them in the first place. They explained their interpretation of the formal position about the Order limits; we understand this point but do not accept that an alternative way forward could not be developed if there was a will to do so among the key players, including Government.

The applicant is to submit their notes of the meeting at Deadline 13 and agreed to supply as a draft to Cawston Parish Council. The following responses deal with the sections of the applicant’s meeting notes as supplied, referring to section numbers as appropriate.

## **Section 2**

### **Hornsea Three**

It is noted that Hornsea Three has yet to confirm to Boreas that they do not plan to use any abnormal indivisible loads. The applicant’s assumption that no AILs would need to be accommodated on the B1145 in Cawston is an underlying assumption for the Cawston Highway Intervention Scheme. AILs featured in significant numbers during the Hornsea Three Planning Inquiry. Hornsea Three have not responded to Cawston Parish Council’s enquiries on this matter or regarding working hours.

### Section 3

#### Parking in Cawston

The applicant proposes reducing parking spaces by removing parking on some parts of the High Street and by taking a metre of the triangle of parking opposite the delicatessen at the end of Chapel Street. This, we are told will have no effect on the number of vehicles which can park there. Presumably the applicant expects vehicles to somehow park closer together, and drivers to enter and exit through the boot as there won't be room to open the doors.

Car parking numbers in the centre of Cawston, an issue crucial to the sustainability of local businesses, raised many times by Cawston Parish Council, is now a "wider issue that (the applicant) is taking away"

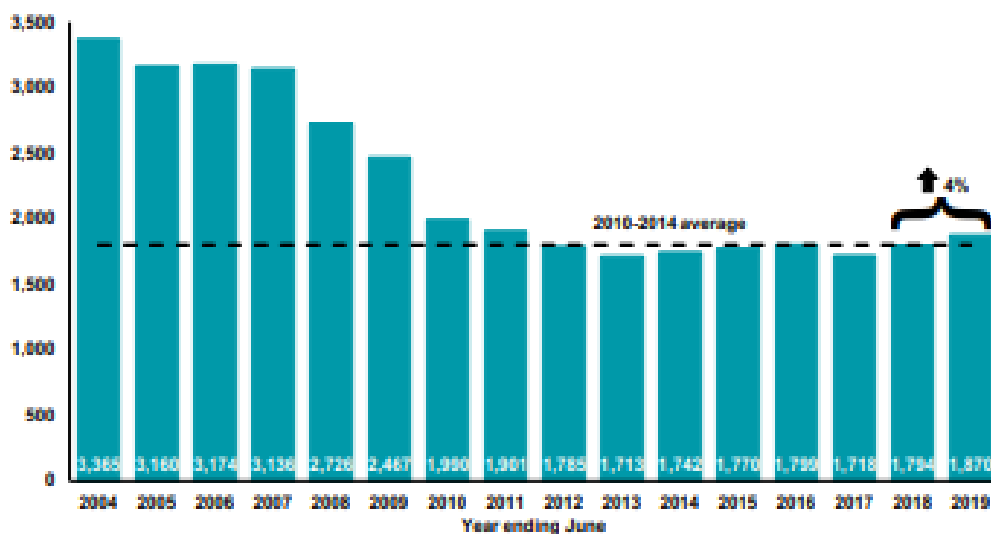
#### Accident data

CPC does not have access to the accident data the applicant used in their assessment of the accident risk in Cawston High Street.

The applicant states that there is insufficient data for a statistical (prediction) model to be used, even when increased volumes of construction traffic are included. CPC contends that the statistical model the applicant has chosen to use is inadequate for the purpose of accident risk prediction in Cawston. Failure to have used an appropriate model, or the non-existence of an appropriate model, does not support the applicant's conclusion that running large additional volumes of construction traffic through Cawston is safe. Other models may not be appropriate for use in Cawston. Again, the absence of an appropriate model does not mean that the HIS traffic proposals are safe.

The applicant has chosen to use just 5 years of accident data, suggesting that is better than using just three years, citing what they refer to as the "Exponential change in vehicle technology" as a reason to not use a longer timescale. Perhaps the applicant means an incremental change taking place in vehicle design, resulting in fewer casualties and fatalities. It may be noted that, as well as the applicant's new vehicles fitted with the latest safety features and driven exclusively by above average drivers, other road users in Cawston may use older vehicles.

#### Road deaths: GB, rolling years ending June, 2004-2019



The Department of Transport's provisional estimates for reported road casualties in Great Britain, published in November 2019, are shown in the diagram above. The DoT concludes

*Although there has been an increase in fatalities and decrease in total casualties in the year ending June 2019, these changes should be interpreted with caution. The increase in fatalities in the year ending June 2019 is likely to be natural variation around the longer term fat trend since 2010.*

The DoT advises that changes in fatality or casualty figures, whether incremental, or exponential, should be interpreted with caution, calling into question the applicant's reasoning to reject using a fuller data set in drawing their conclusions on accident risk.

Appendix 1 shows an output of the CrashMap accident data available for Cawston, showing the pattern of accidents under existing traffic conditions. Commenting on the Crashmap accident data which is available to Cawston Parish Council, the applicant suggests that, in the village centre, two accidents don't make a cluster thus providing insufficient data to apply their statistical model.

Not using a statistical model because you have insufficient data to use that model means that model's output fails to predict any outcome for the highway intervention scheme, safe or otherwise. It seems that, for the proposed Cawston HIS, the applicant's predictions of a safe scheme are based on not having sufficient data gained under current traffic conditions to apply to a statistical model. This lack of evidence appears to be no impediment to making predictions of accident risk under conditions of much heavier traffic flows through the village.

#### **20mph zones**

In describing the benefits of a 20mph zone the applicant refers to "*early Dutch work that says they are 80-85% effective in reducing accidents*". Positive experiences during visits to the Netherlands of speed reduction in rural communities has prompted further investigation by Cawston Parish Council.

In his paper *Road safety in residential areas The Dutch experiences*, presented to PIARC (World Road Association) Committee 13 Road Safety Meeting, Yokohama, 26-27 April 1993, Professor Fred Wegman of Delft University of Technology states:

"It was generally acknowledged that with regard to road safety in residential areas two features were essential: reducing speed of traffic and reducing (through) traffic."

From this finding the paper goes on to note that "three principles could be followed to improve road safety inside residential areas: to reduce the volumes of motorised traffic by simple one-way streets systems and street closings, secondly to reduce traffic and to restrict driving speeds of motorised traffic (cars, motorcycles and mopeds) by speed restricting measures and thirdly by creating woonerf areas."

The applicant's plan for Cawston is to *increase* traffic volumes and to confine their very limited speed restricting measures to the centre of Cawston where they will have no effect on traffic approaching the village centre from either the east or west. The HIS proposes no road features beyond signage outside the central area to enable road users to perceive they are in a 20mph zone and reduce speed accordingly. It would seem reasonable to presume that, in line with much evidence of the impact of signage alone, vehicles will not slow down significantly before reaching the central area.

#### **Monitoring and compliance**

Cawston Parish Council does not agree with Norfolk County Council that the Highway Intervention Scheme is technically feasible. The EIA for construction traffic in Cawston has not been based on a cautious 'worst case' approach and the Highway Intervention Scheme is not adequate to deal with the worst case.

In view of Cawston Parish Council's fears for the ineffectiveness of the latest version of the Highway Intervention Scheme we have asked both the applicant and Norfolk Highways what will happen when the scheme fails to work as predicted. The answers received are concerning, based on "Incrementally reducing the

volume of traffic passing through Cawston from 239 HGV movements through targeted intervention informed by monitoring and consultation with the Highway Authority.”

CPC understands this to mean the applicant and/or other Hornsea 3 project will reduce the peak level of HGV traffic until it is possible for that level of traffic to pass through Cawston.

For residents this would mean living with a further prolonged period of construction traffic at a lower peak level. The measures of noise and vibration used by the applicant are inappropriate to the Cawston High Street location because of the tunnelling effect of the facades.

Broadland District Council has estimated magnitude of noise changes in the short term of around 4dB, well within the Moderate/Medium magnitude of change. The significance of the effect will depend on the magnitude of change and the sensitivity of the receiving environment, in this case high sensitivity with some residential properties less than three metres from the road.

The Applicant agrees that there will be a significant flow of traffic early morning – we understand that noise standards are lower before 0700. This has not been mentioned in the Applicant’s assessments.

### **Wing mirrors**

The applicant states it is illegal for wing mirrors to protrude more than 250mm from truck body.

There might be a lot of illegal trucks operating in Norfolk . Examples are shown in the following photographs.



Norfolk Highways gritters ready for the winter, displaying their allegedly illegal stainless steel mirror protectors



Dashcam photo of Freight Force HGV entering Cawston for Cawston Winery. Note steel wing mirror protectors. Also note the vehicle is straddling the white line in part of the B1145 not identified by the applicant as “potential HGV-Car conflict area” – in reality that is most of the B1145 from the B1149 roundabout, through the village and on towards Salle.

### **Visibility**

The applicant clarified that the UK standards have a safe stopping distance for HGVs travelling at 20mph and that is 26.7m, and that is what has been applied. The reason CPC raised the visibility lines outside the village hall was not because of concerns that an HGV could not stop in time as it approached the corner but that by the time it has stopped the HGV would be in a particularly narrow area and oncoming vehicles would be unable to pass it. If the HGV was to head a platoon of vehicles, manoeuvring to allow oncoming traffic to pass safely would be even more difficult resulting in delays and further platooning.

### **Platooning**

The applicant states that "Forecasted arrival rates suggest it (platooning) will not be a problem." In this case a forecasting model is being applied but we doubt that a generic model is adequate to describe and predict the situation on B1145 near Cawston. Does the model include provision for, and the interactions between, traffic flows from both east and west negotiating the single file to HGVs, Salle Beck bridge and the old railway bridge where oncoming vehicles need to give way if they are to cross?

The applicant claims that cyclists and other slow-moving road users have been taken into account "Forecasting included any number of randomised traffic events; the scheme has a robustness built in." It is worth noting that cyclists are legitimate road users who do not just appear at random traffic events. Since May, in response to Covid-19, people have been urged to walk or cycle to work or elsewhere when possible. No provision for cyclists or their safety when using the B1145 appears in the Cawston Highway Intervention Scheme.

The applicant refers to the Highway Intervention Scheme' provision "in the vicinity of Booton Road to provide a larger 'reservoir' (holding area) for HGVs thus reduce the likelihood of blocking back. This was built in to increase robustness." This "reservoir" feature is limited to the length of three HGVs and relies on those HGVs not to be separated by other vehicles, a longer platoon would extend around the corner and up the hill towards the village hall. It is worth reiterating that, under present road conditions, all vehicles have to stop to allow oncoming traffic to pass due to the narrowness of the road.

In their notes, the applicant states that "If there are any issues than driver compliance measures identified." We take this to mean that in the event that, or when, the HIS does not work the applicant can brief their contractor's drivers. We wonder what they would tell them to do, think thin? Don't let other traffic get between you and the truck in front? Other road users would not have the benefit if this briefing and might not know what to do as they arrive in a stream of traffic.

To quote Professor Wegman again:

*One of the problems of our road transport system today is that roads and streets are expected to fulfil incompatible functions at the same time, where the road user generally has to guess what to expect from the road traffic situation, and is presumed to guess what others expect from him: thousand times it goes smoothly, until one time, he makes an error.*





Platooning around Cawston takes on an altogether more challenging nature when a local road is closed and drivers consider Norfolk Highways' diversion route is impractical.

#### **Practical concerns of entrance and egress onto B1145**

CPC shares Ms Brockis' concern about how she might safely enter and exit her home which is situated in what the applicant describes as "the Potential two-way articulated HGV and car conflict area" one of the narrowest stretches of the B1145 in Cawston, on the approach to one of the applicant's designated "passing places". For vehicles travelling east, waiting on the "triangle" for the opportunity to enter the "potential HGV-Car conflict area", vision of the property's entrance is obscured. Traffic joining from Chapel St has no visibility into the "potential HGV-Car conflict area".

The applicant has committed to look at the issue further and plans to revisit the location on 31st July.

The Applicant's swept path analysis seems to have completely overlooked the Whitehouse Farm entrance. How is that possible in a "robust" and professional piece of work?

The existence of a "gentleman's agreement" to prevent Cawston Winery HGV traffic having to pass on Chapel St. was discussed. The arrangement is for HGVs to enter Chapel Street only from the south and leave the Winery to the north, following the road to the junction with B1149, crossing the Vanguard/Boreas cable route.

Co-ordinating HGV delivery demand with local business is a delivery management measure in the applicant's OTMP which speaks about co-ordination with deliveries relating to the Winery operations affecting the B1145, Cawston High Street.

The applicant assures us that access for Winery HGV traffic to the B1149 will be maintained when Chapel St will be subject to an open cut crossing. That assurance would be more credible if the applicant had even contacted the Winery to assess the scale and nature of the traffic flow to produce specific proposals for large articulated lorries to negotiate the trenched road.

When questioned, the applicant confirmed that, even as we near the end of a second planning inquiry, no contact has yet taken place with Cawston Winery. It is concerning that the applicant has decided to pass to an as yet unappointed haulage contractor, post consent, fundamental issues for their proposed HIS such as coordination with local business to prevent traffic congestion.

## **5 Additional mitigation measures**

### **Secretary of State Decision on Norfolk Vanguard**

In his recent decision the Secretary of State has acknowledged the adverse impact during construction and operation particularly in relation to cumulative traffic impacts at Cawston) but 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.

In this perverse decision the Secretary of State seems to be favouring the financial interests of Vattenfall, owned by the Swedish Government on behalf of Swedish taxpayers, over the interests of our community and its British taxpayers.

### **Community Benefits**

During the meeting the applicant’s representatives spoke at length about the myriad benefits of their project on the local area and added “Beyond that during construction, and in the planning of construction works, when we are in close dialogue with local stakeholders and communities about implementation, that fits with other local road users and also tries as far as possible to align with other local priorities, including those of communities like Cawston.”

CPC’s dictionary definition of the term dialogue is “a discussion between representatives of parties to a conflict that is aimed at resolution.” Is dialogue what has been taking place?

A means to assess whether a dialogue is genuine could be to identify any features of the applicant’s plan which have been changed to align with local priorities in Cawston and aimed at resolution. What has changed a result of the “close dialogue?”

When the Norfolk Vanguard and then Boreas planning inquiries commenced, the applicant’s plan was to drive all of its construction traffic through Cawston on the B1145. That plan remains unchanged, including driving all the materials to construct the haul road through Cawston and then to drive all those materials back through Cawston when it is removed.

At every stage the applicant has rejected any alternative option to adapt its construction methods or divert it’s construction traffic onto their haul road, avoiding using the B1145 for construction traffic and the associated impacts on our village.

The latest version of the Highway Intervention Scheme exists, not “to align with other local priorities, including those of communities like Cawston” but to seek to remove or overcome any obstruction to the applicant’s construction traffic on the B1145.

What of benefits to our community? In case the residents of Cawston had not noticed, the applicant helpfully informed us “You have already experienced some small benefits that can emerge from constructive dialogue, for example you highlighted to us some difficulty in attaining funding to replace old / not-working high-energy street lighting, with new LED lights, and you explained the lighting was important in relation to routes to school taken by local pupils and other pedestrians. We agreed to provide most of the funding to enable the PC to replace the deficient lighting, because we felt it would support local priorities and help build trust and serve to assist us to keep talking to one another.”

It seems the applicant's support for local priorities does not extend to diverting construction traffic from the village centre or making any proposals to mitigate the undoubted impact of construction traffic noise and vibration on those living in Cawston.

Conveniently for the applicant, "At Cawston our assessments have not identified any significant impacts with respect to noise. With respect to vibration/structural surveys the vibration assessments we have undertaken indicate that levels are much lower than those which would potentially result in structural damage. Therefore, under the EIA process, no mitigation measures are required nor proposed, under the DCO. However, this is not to say that we rule out seeking locally appropriate, informal improvements and how the scheme is perceived by residents, post consent."

Structural damage by the applicant's construction traffic is their only concern. The well-being of Cawston residents when experiencing congestion, noise and vibration can be safely disregarded, followed with just a hint of jam tomorrow, post consent, when the applicant will have even less incentive to engage positively with our community. Strange how all the hints of mitigation are offered post consent.

It seems that the applicant believes they are helping us by getting us to help them, stating "Also, in order to help you have confidence in our traffic and parking assessments, we organised for an independent specialist from RHDHV (not connected to the Project) to provide training and guidance on conducting parking surveys."

In reality a few members of the Parish Council undertook some parking surveys on the applicant's behalf, under the instruction of a Royal Haskoning consultant. CPC thought this was a friendly and constructive action as part of a dialogue aimed at resolution of the problems the applicant presents us with. If those CPC members had known then that the applicant would use the data collected as evidence to justify removing parking from the centre of Cawston to provide a passing place for HGVs it would have been suggested, politely, that you can do your own survey. Confidence in the way parking surveys are carried out is the least of our problems. It is noticeable that the applicant has not been keen to build confidence by carrying out noise and vibration surveys in the village or by offering any condition surveys to properties on the High Street.

At the Cawston Open Floor Hearing the ExA asked about joint meetings with Hornsea Three and the applicant.

The following are an extract from the draft notes of the recent meeting, supplied by the applicant.

CM – Is there any plans for a meeting between the three projects in the near future? JL – HP3 aren't in the same position as Norfolk Boreas as they are outside the examination process so there are no short-term plans CD – Once all the projects have been given consent, more likely to all have meetings across projects. JL – There have been commitments made for all projects to work together, however this probably won't be in the short term.
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So the answer to the ExA's question appears to be, no then.

We close by referring back to our submission on 2nd July when Mr Court offered these comments:-

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

In their recent display of well-orchestrated corporate whinging about delays to this and earlier inquiries the applicant complained that the process has been going on for four years and should be concluded. We agree, it is time for this matter to be resolved to avoid unnecessary destruction of our village community by wind farm construction traffic.

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:

Our Vattenfall odyssey started with the plan to widen 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 somehow safer for pedestrians that the road is wider.

There was the version where they had properly measured the width of the road and had got a CAD system to draw unfeasibly thin lines very close to each other on a big map. They proudly 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 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 other vehicles between them, meet up 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 are a feature of the Hornsea 3 construction project.

If this scheme is driven through we fear it will soon prove to be unworkable because of the unrealistic assumptions it is based upon 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.

The Cawston Highway Intervention Scheme plans remain fundamentally flawed. Have Vattenfall's claims to engage with stakeholders and "minimise the negative" lead to changes beyond reworking the HIS? Certainly not to their cable route.

Vattenfall presented five options at the meeting called by the Inspectors to consider alternative routes. Their rather elaborate version of our suggested bypass, option 2, was chosen as the preferred route by Cawston Parish Council, Broadland District Council and Norfolk County Council.

Vattenfall now claim that option 2, an alternative route they presented, is impractical and that their original plan, forcing all their traffic through Cawston, is best. No change there then. Cawston Parish Council is also criticised for not proposing the alternative earlier in the consultation process. Isn't properly considering alternatives their job?

Even slight changes are ruled out. The applicant rejected Cawston Parish Council's suggestion to both Vanguard and Boreas inquiries to slightly realign the cable route to the other side of a field, away from residential properties in Sygate. It seems that Vattenfall's "minimising the negative" does not extend to disturbance to Sygate's residents.

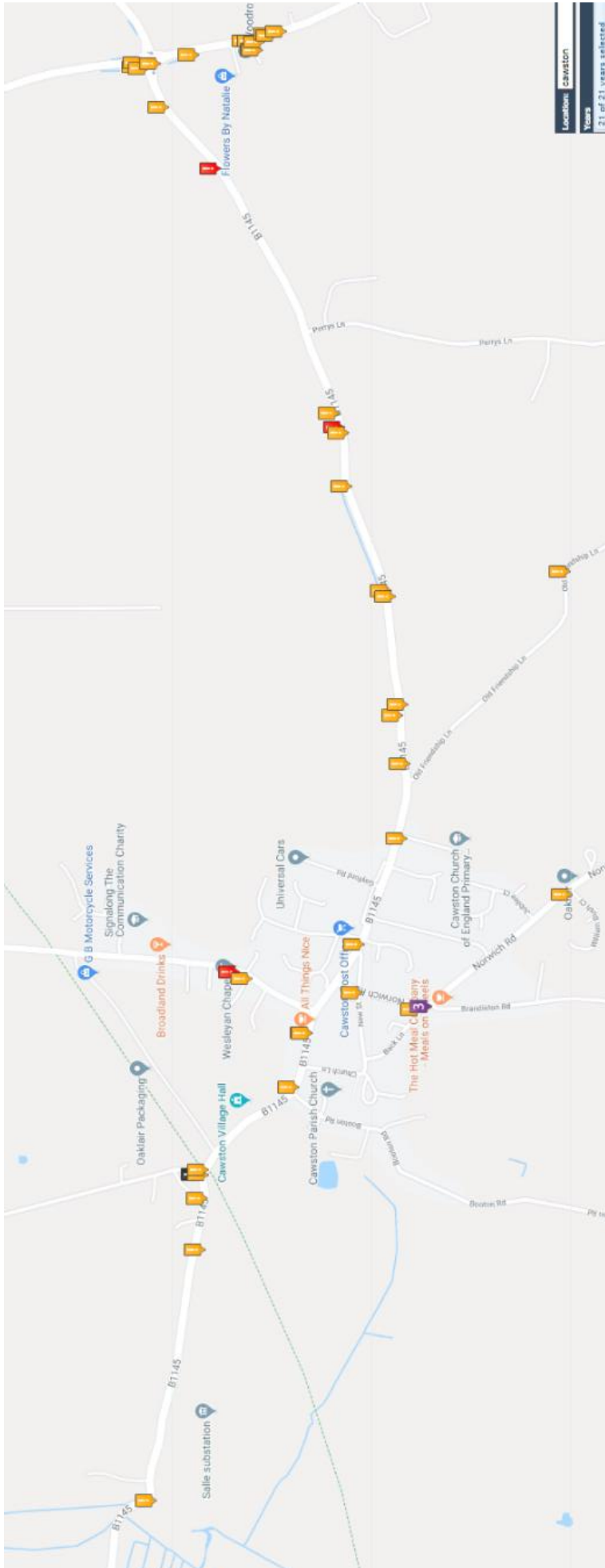
Cumulative impacts continue to accumulate. Recently our councillors were invited to consultation on Equinor's Sheringham Shoal Dudgeon Extension, the fourth wind farm cable route passing Cawston. They plan to start in 2022 and who knows what cumulative impacts their construction traffic might have with 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 to conduct their business safely and minimise their negative impact on our village.

Outside of Vattenfall a consensus exists that Option 2 is the optimum solution to the Cawston problem. After four years of gaining a better understanding of how to manage their impact in Cawston, it is time for Vattenfall to live up to their claim to maximise the positive and minimise their negative impact, or was that just more greenwash?

... Nearly a month and another unproductive meeting later, nothing has changed.

Cawston Parish Council  
29/07/2020



Appendix 1

Output of CrashMap data for Cawston village including the approaches from east and west.

