

CAWSTON PARISH COUNCIL Norfolk Boreas Offshore Windfarm Inquiry Deadline 15 Submission

Cawston Parish Council intends to respond fully to deadline 14 submissions at deadline 16 but for deadline 15 we have prioritised providing new, or at least recently emerged, evidence to the ExA relating to our main concerns which we feel should prompt an immediate response and action from the applicant, RSA auditor, Norfolk Highways and Broadland District Council before deadline 16.

In the course of a meeting with Hornsea 3 Project representatives on Thursday 27th August it emerged that Hornsea 3 intend to use the B1145 through Cawston for 105 Cable Drum abnormal loads, accompanied by convoy vehicles, which will require either a temporary footway closure in the village centre or the removal of all parking spaces on a stretch of Cawston High Street. It was stated that these proposed closures, typically two per day for 11 weeks, have yet to be discussed with Norfolk Highways.

It also emerged that Hornsea 3 intend to operate outside the hours specified in the applicant's HIS and CTMP, including operation on Saturdays.

Cawston Parish Council's concerns remain that:

A The applicant's HIS is not feasible, and is made even less feasible by Hornsea 3's proposal for abnormal loads, about which the applicant's HIS is silent:

Hornsea 3's Abnormal loads call into question further the possibility that HGVs might pass safely in Cawston village centre. The swept path data upon which the applicant has relied to claim technical feasibility for their scheme is based on even less accurate vehicle dimensions.

Congestion from convoys, which are effectively temporary road closures, makes platooning of traffic approaching Cawston inevitable. Platooning of traffic, makes the applicant's HIS passing place concept impractical and ineffective. Access for emergency vehicles, public transport and existing traffic flows will be disrupted with unacceptable increases in waiting times.

Hornsea 3 stated that they have yet to speak to Norfolk Highways about their proposals designed to enable Abnormal Loads to safely pass through Cawston. The proposals as described to CPC on Thursday 27th August have two options:

Either:

Temporarily to close the footway in the centre of Cawston to allow an abnormal load to overlap the narrow footway on the south side of the High Street.

- Closing the narrow footway is impractical and threatens Grade 2 listed buildings on the High Street.
- These are photographs were taken after a recent accident on the same footway which Hornsea 3 propose to use for their abnormal loads



- The proposal to close the footpath endangers residents' properties, the timely passage of emergency vehicles, and endangers parked vehicles on the north side of the High Street.

Or

Introducing parking restrictions to clear parked cars from the north side of Cawston High Street.

- It is not feasible to apply a temporary restriction which only operates at convoy times.
- Economic and social impacts on local businesses and residents
- Removing protection of pedestrians from passing HGV traffic and encouraging excess speed for vehicles in the applicant's, largely unmarked, "20mph zone."
- The following is an extract from the Applicant's Road Safety Audit, Document Reference : ExA.AS-3.D5.V1 Deadline 5

"Whilst the Audit Team note that within the Technical Note Dated January 2020 states that it has been agreed that 'by providing adequate road space and introducing the mandatory 20mph speed limit that the likelihood of a pedestrian and vehicle conflict will be reduced and therefore will mitigate the pedestrian amenity impact.' and that 'It is also highlighted that at the narrowest points of the footpath protection is afforded by parked vehicles.'

.....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."

B Cumulative impacts on Cawston and it's residents have not been not properly assessed or mitigated

- **EN010087-002199-DL11 -Hornsea Project Three Boreas, Confirmation of Statement of Common Ground and Traffic Matters** fails to detail Hornsea 3 Project's intention to vary the working hours specified in the applicant's HIS to start on weekdays at 7am and additionally to operate on Saturdays from 7am to 1pm. The statement of common ground also omits to mention that Hornsea 3 plan to use abnormal loads, with convoy vehicles, on the B1145 through Cawston.
- Norfolk Highways "technical feasibility" opinion relies on an RSA which does not take into account abnormal loads, fails to address the proposed use of footway for abnormal loads or the removal of parked vehicles on Cawston High Street.
- The HIS Road Safety Audit requires reworking to include the impacts of the H3 construction proposals which have been revealed.

The applicant, and their fellow wind farm developer with whom they claim to be working closely, continue to fail to properly assess the impact, concentration and increased duration of noise, vibration and air quality on Cawston and it's residents.

As the end of a third planning inquiry approaches the various applicants continue to produce unpleasant surprises which they have concealed, omitted to mention or misrepresented. In response to repeated questioning from Cawston Parish Council the applicant has stated that Hornsea 3 would not be driving abnormal loads through Cawston. It now appears this is inaccurate and, at best, another failure of the applicant's communication strategy. Any motives of the applicant and Hornsea 3 in delaying the emergence of crucial information about the proposed Cawston Highway Intervention Scheme can only be speculated upon.

Cawston Parish Council has experienced a mixed bag of corporate games, intrigues and incompetence from wind farm developers in more than two years involvement in National Infrastructure Planning Inquiries. The Council remains determined that the significant effects on our village community of the applicant's proposed development together with the cumulative impacts with other proposed windfarm developments should be identified, properly assessed and effectively mitigated.

Cawston Parish Council
31st August 2020

CAWSTON PC – REPORT OF MEETING WITH ORSTED (HORNSEA THREE) 27TH AUGUST 2020

We write to confirm details of our meeting with Orsted (Hornsea Three) on 27th August, and note some disturbing developments.

Our detailed summary of the meeting is below, together with our response to a request by them for feedback on the suggestions for the movement of abnormal loads.

Having been assured several times by Vattenfall that H3 would adopt the latest HIS, would not be using abnormal loads and would align with the revised 5 day working week, we were surprised to find that none of these statements is true.

In fact, over a two month period, H3 plan to run 105 escorted abnormal loads, each 3.3 metres wide, on vehicles 18 metres long by 2.9 metres wide, with the return journey being unescorted. There would be a 15 – 20 minute transit time, which we suggest will cause huge congestion problems, with unavoidable platooning of traffic on the B1145 in both easterly and westerly directions.

The avoidance of platooning is of crucial importance to the claimed theoretical viability of Vattenfall's Highway Intervention Scheme. Abnormal loads do not figure in the already tenuous calculations underlying Vattenfall's HIS and their present underassessment of the cumulative impacts of construction traffic on Cawston and its residents.

Hornsea Three also plan to maintain their original working hours, starting at 0700 and including Saturdays from 0700 to 1300.

Since the HIS currently being examined is supposed to apply equally to H3 and Vanguard, we feel that in terms of cumulative impact these are fundamental changes which affect both the Road Safety Audit conclusions and Norfolk County Council's assessment of the HIS as "technically possible", and would request that these conclusions should be re-evaluated as a matter of urgency.

SUMMARY OF THE MEETING ON 27TH AUGUST

Dear [REDACTED] *et al*,

Thanks for your time on Thursday; we found it very illuminating.

Can I just outline our understanding from the meeting and pose a few further questions that we didn't have time to cover?

[REDACTED] *advised that the two phases, 9 & 10, would be staggered, resulting in lower HGV numbers but for a longer period (11 months) with a one month peak of 127.*

Although Hornsea Three have committed to apply the final Highway Intervention Scheme being examined in Norfolk Boreas, this is not the complete commitment that we had been led to believe by Vattenfall.

In particular you told us that H3 plans to send 105 escorted 3.3 metre wide abnormal loads of cable drums through Cawston, compressed into a two month period, typically 2 journeys per day. In fact the spreadsheet gives 105 loads and with a working month of 23 days, so that is an average of 2.3 per day.

These abnormal loads would be on a standard low loader, 18 metres long, 42 tonnes gross weight and 2.9 metres wide with the drums overhanging. Transit of Cawston is expected to take 15-20 minutes.

It is planned to achieve this by closing the High Street southern footpath during transit and retaining on street parking. There would be a 0.5 metre overhang of the footpath.

The importance of retaining on street parking has been agreed by all parties on many occasions and is referred to as a safety measure which protects pedestrians from passing traffic and serves to reduce speeds in the Road Safety Audit of the latest Highway Intervention Scheme.

The corresponding 105 return journeys, without loads, will be made without escort by vehicles that are 2.9 metres wide, plus mirrors.

█ showed us drawings but explained that these were still in draft and could not be shared at this time. You will be meeting Norfolk CC Highways to discuss this and expect to be able to release the drawings after that.

Both NCC and Vattenfall apparently are aware of the 3.3 metre abnormal load plan, although in communications with Cawston Parish Council both have stated that Hornsea 3 would not have any abnormal loads travelling through Cawston.

We mentioned the experience of a recent escorted abnormal load, the only one we are aware of, which damaged property in the village and at the Salle Beck bridges. You suggested that your loads would not have these issues. We remain sceptical.

Another point of variance from Vattenfall is over working hours, where you told us you still plan to follow the 5.5 day pattern originally proposed, and not adhere to the revised 5 day pattern adopted by Vattenfall.

You will have gathered that these two issues came as something of a shock to us, as Vattenfall have assured us on several occasions that there would be no abnormal loads and that working hours would be aligned.

We spoke about the possibility, raised in the H3 Examination, of re-routing some traffic along Heydon Road, but you had taken no action on that. We think there may be a misunderstanding here; to be clear, we are referring to the road that runs west from the B1149 towards Heydon. We suspect that you are considering the road that runs north west from the B1145 Marriotts Way bridge in Cawston.

If approved, you advised us that the expected start date for these works would be around Q3 in 2023, but you could not at this stage tell us whether we might expect 11 months of continuous work or a split over two phases. You promised to keep us informed on these issues.

Other queries and actions;-

It would be helpful if we could have copies of the scale drawings once they are available after you meet NCC.

We would appreciate it if you can advise your proposed working hours, which we understand to be 0700 – 1800 Mon – Fri (with breaks 0730-0900 & 1500-1600) and 0700 - 1300 on Saturdays

Can you also send this information to the Norfolk Boreas Inspectors, to confirm the information we will be giving them.

It would also be helpful to know precisely which parts of the proposed Boreas Highway Intervention Scheme you will be adopting.

An area which we did not get round to discussing is that of non HGV traffic. Your spreadsheet gives a figure of 7657 staff movements on Sections 9 & 10; is that the total we might expect through Cawston or will there be other traffic going to and from the Oulton compound? Can you give us some idea of the overall total non HGV traffic, and duration if different from the 11 months previously noted?

Thanks for your help.

CPC RESPONSE TO A FURTHER EMAIL FROM ORSTED, RECEIVED 28TH AUGUST

Hi [REDACTED]

Thanks for your email, it was good to catch up and hopefully we can keep in touch more frequently going forward.

You asked for the CPC views about the two suggestions for running 105 x 3.3 metre wide abnormal loads through the village. You will have gathered this came as something of a surprise to us after Vattenfall had assured us several times there would be no abnormal loads at all.

The two suggestions were to close the footpath on the southern side of the High St for the duration of transit, allowing a 0.5 metre overhang, or to take away the on street parking in this area.

The value of on street parking has been discussed many times in the various Examinations; all parties have agreed upon its importance. In fact it is a cornerstone of the HIS proposed by Vattenfall and their rationale for creating a 20mph "zone". Removing parking is out of the question.

The proposal to close the footpath is equally unacceptable. We would question whether there is enough combined road and pavement width for this to be done safely. The one recent experience of such an abnormal load damaged property and caused considerable traffic problems.

It was mentioned that each load, two or three a day on average, would take 15-20 minutes to transit the village. During this time east bound traffic would be blocked and the centre of the village gridlocked, while residents would effectively be prisoners in their properties.

We conclude that neither of these proposals has merit.

Kind regards