

CAWSTON PARISH COUNCIL NORFOLK BOREAS OFFSHORE WINDFARM INQUIRY DEADLINE 16 SUBMISSION

Our concerns have been set out in detail in previous submissions over the feasibility, practicality and safety of the proposed Highway Intervention Scheme through Cawston and that scheme's supposed capacity to mitigate either the disputed or undisputed impacts on the village and its inhabitants.

We do not think it is necessary to copy and paste the detail here in repetition, though we add our support to the concerns of the residents of White House Farm regarding safe access to and from that property and the adjacent junctions, which does not seem to have been sufficiently considered in the HIS.

One significant change since our meeting with the Applicant in July is the revelation of Hornsea Three's plans for abnormal loads, which we reported in our D15 submission, and the Applicant's comments, published on 9th September.

We have recently been in correspondence with both the Applicant and Hornsea Three in an attempt to clarify the proposals, and they have advised as follows:-

1. Emails received from the Applicant (their emphasis)

(9th Sept) "At this stage a cable drum specification has not been developed. In terms of numbers of drums, the derivation has have (sic) been extrapolated from the DCO application."

(22nd Sept) "... To be clear Norfolk Boreas (and Norfolk Vanguard) will not be taking any abnormal loads through Cawston and we will secure this commitment in an updated OTMP to be submitted at Deadline 18.

As stated Norfolk Boreas (and Norfolk Vanguard) will be using cable drums which can be transported on a standard HGV with a maximum width of 2.55m, in line with the maximum standard parameters set out in The Road Vehicles (Construction and Use) Regulations 1986. As such they will not be abnormal loads, do not require to be transported under abnormal loads conditions and do not require any further traffic management measures during transportation. Any empty cable drums will be removed from site and will also not be abnormal loads.

The Hornsea Project Three 3.3m wide cable drums would require transportation under abnormal load conditions and any momentary traffic measures which would need to be in place to facilitate this will be determined by Hornsea Project Three."

2. Emails exchanged with Hornsea Three

(18th Sept -1) "...We have been working to explore options internally and with Vattenfall and following our conversation on 27 August, we are pleased to confirm that we are able to commit to the HGV window previously committed by Norfolk Boreas. To be clear that is: 9am to 6pm Monday to Friday, with an exclusion 3-4pm. As you note in your email below, this is captured in the Applicant's (Norfolk Boreas') response to D15. The non-HGV traffic would not be restricted to this HGV window.

With this additional commitment on the working hours, we are now committed to the physical scheme put forward by Norfolk Boreas, the HGV hours specific to Cawston, and the driver compliance measures.

For the non-HGV traffic, we can put together some further information breaking down the totals, however as the project is still at an early stage of development and these movements are more varied, it is not possible to profile these similarly to the HGV traffic.

In terms of the proposal for the 3.3m wide loads, as we explained at our meeting there are two safe options which we are currently exploring - thank you for your feedback on these. We have had an initial conversation with Norfolk County Council, but have not yet finalised this."

(18th Sept -2) "One small amendment to my email below – I should have added that the 3-4pm exclusion is during school term time only."

(22ND Sept – CPC to H3)

"Can you confirm that the Norfolk Boreas ExA have been informed of these details? We will include it in our submission but I imagine they would want confirmation from yourselves.

As previously stated, we would challenge the description of your proposals for 3.3 metre wide abnormal loads as "safe". We look forward to hearing the outcome of your discussions with NCC and receiving copies of scale drawings when available.

We would also appreciate some further information on non HGV traffic, as mentioned."

(23rd Sept) "...In terms of notifying the Norfolk Boreas Examining Authority, we plan to submit a revised Statement of Common Ground with Vattenfall at the next deadline which will confirm our position and will share the drawings and additional information with you when available."

To summarise, we note with thanks the Applicants clear distinction between their proposals and those of Hornsea Three; however, this begs the question as to why H3 still intend to use 3.3 metre drums and abnormal loads when it appears that this can be avoided by Boreas.

The cumulative effect of this plan and its undermining of the HIS safeguards for Cawston residents is a major concern of relevance to the Boreas Examination when there is a distinct possibility that the two projects will be operating at the same time. Our concerns were set out in our D15 submission.

In their comments, the Applicant tries to rely on a narrow definition of "abnormal load" as the legal term "abnormal indivisible load" and claims that this was the subject of our questions. They do acknowledge the use of "abnormal load" as a generic term to cover a load exceeding maximum standard parameters, and we suggest it would have been clear that we were referring to this type of situation.

In the context of our questions and submissions over time about H3 it is, at best, disingenuous for the Applicant to claim they thought we were referring just to AILs in the legal sense, and for them to have taken until now to draw the distinction.

In our D6 submission comments on the Road Safety Audit we noted that "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." We continue to argue that the RSA should be re-evaluated in light of the H3 cable drum movement proposals, and note that we still await clarification of the Vattenfall plans for such loads.

The Applicant's response suggests that H3 drum movements will require "momentary traffic management measures required for cable drum movements". With an average of two or three journeys a day requiring either suspension of parking or closure of footpath we argue that this undermines the claimed theoretical safety of the HIS which relies on parking to create a "20mph zone".

Elsewhere, in REP14-039 the Applicant states “ *There is a short section of the scheme in the vicinity of No.10 High Street that narrows to just over 5m wide after which the carriageway alignment flares out to an average of 5.6m wide. A private car in the UK measures in the range of 1.7m (compact hatch back) to 1.9m (large SUV). The HIS parking bays are sized similar to those applied to resident parking schemes and define a 2m wide box to encourage efficient use of road-space.*

The CPC figures quoted are for a large SUV with both wing mirrors fully extended. The parking bays are sized to encourage parking close to the kerbline (a behaviour that can be observed in current conditions) thus negating the influence of the wing mirror on the HGV path.”

We do not see what relevance an average width of 5.6m, without stating which length of road is being measured, has. Surely the key dimension is the width at the pinch points, which occur in many places along the B1145 from the B1149 roundabout to Salle Beck bridges.

While we quoted actual dimensions of cars owned by residents, the Applicant makes general statements without sources. A review of small hatch backs on *automobiledimension.com* found base widths all in excess of 1.7m, with mirrors typically adding around 200mm. Similarly, most large SUVs had a base measurement in excess of 1.9m, with mirrors taking them to around 2.2m (for example, see the Range Rover, 1990/2220mm).

The Applicant goes on to state “*the scheme meets the design principle of providing adequate road space for HGVs to traverse the High Street without the requirement to mount or project over the pavement.*” One can only assume that the author was not present at any of the ASIs where this was seen to happen many times. There is a world of difference between box ticking computer models where mirrors on cars and HGVs can overlap and vehicles pass safely with just millimetres of space, and the reality of life on the ground.

The extensive series of swept path diagrams the applicant claimed to demonstrate the supposed safe passage through Cawston of their HGVs (of a 2.25m track width fitted with miraculously non-protruding, presumably ineffective, wing mirrors). The applicant has yet to produce swept path diagrams for the accompanied Hornsea 3 Abnormal Loads with their 3.3 metre wide load. Such an analysis would identify additional and extended “*potential two way HGV conflict areas*” identified in Norfolk Boreas Offshore Wind Farm Outline Traffic Management Plan Appendices Part 1 of 2 (Version 6) The extended HGV conflict areas, together with the impact of any convoy system operated by Hornsea 3 exacerbating the existing problem of “*platooning*” of HGV and other traffic, will render the core concept of the Highway Intervention Scheme even less feasible.

In their recent email, quoted above, Hornsea 3 regards the passage of their cable drum loads as requiring one of “*two safe options which we are currently exploring.*” The applicant appears not to have any concerns about the safety of their cable drum transport through the narrowest stretches of the B1145 in Cawston.

The Applicant’s own figures give a construction period of 6 years from 2022 to 2028; this is hardly “*temporary*” and unlikely to be “*reversible*”, and it does not take into account pre-construction activity and the proposed addition of two phases of Equinor SEP/DEP, planned to start in 2024 and likely to extend well beyond 2028. This will have a devastating impact on our village community.

The cumulative impacts of construction traffic of the many wind farm cable route projects are still not fully assessed. Even those impacts which the applicant acknowledges are not adequately or safely mitigated by their plans.

Cawston Parish Council

27th September 2020