

CAWSTON PARISH COUNCIL NORFOLK BOREAS OFFSHORE WINDFARM INQUIRY

DEADLINE 18 SUBMISSION

In this submission for the final deadline can we thank the ExA and the Case Team for their rigour in conducting the Examination in exceptional circumstances, and their understanding and support of those of us who have limited resources and experience in these matters?

Our submissions throughout the Examination have gone into much detail to demonstrate the inadequacies of the current proposed Highway intervention Scheme for Cawston, and we do not think it should be necessary to repeat them all here. We are only too well aware of what Prof. Barnett described as “death by data”, and will try to be brief and to the point.

The Applicant’s responses have tended to be dismissive and selective, rarely engaging constructively with the detail that we have provided such as road and vehicle measurements, preferring to rely on generalisations.

In their Deadline 17 submission, REP-003, commenting on the D16 documents, the Applicant reiterates that H3’s specification for cable drums was published at the end of their examination. **This is precisely why we brought up the question of H3 abnormal loads on several occasions when discussing the proposed HIS with the Applicant** – to be assured that H3 would not now be using abnormal loads; a statement that we tried, without success to get H3 to confirm. This was noted in our submissions.

We now realise it was a grave mistake to accept the Applicant’s assurances in good faith. We ask the ExA - please do not make the mistake that we did, and accept the Applicant’s statements without having confirmation from a reliable third party.

The Applicant goes on to say that these cable drum loads were a “**key consideration**” (our emphasis) in the finalisation of the HIS. They then go on to claim that it is not their responsibility to provide swept path analysis and any additional information regarding H3 will need to be produced by H3 and approved by NCC. This seems to be a case of trying to have your cake and eat it too.

They claim the HIS is designed with “potential for momentary traffic measures required for cable drum movements”, but do not explain how you can “momentarily” suspend on street parking 3 or 4 times a day, or “momentarily” close a footpath, stopping pedestrians and trapping residents.

The Applicant lists its various responses and goes on to note the outcomes from the development of the HIS. It fails to note that these responses often just repeat the points that were being challenged, without addressing the challenges themselves.

For example, here they note that we raised, again, the specific issue of road width at pinch points, and of the measurements of actual vehicles compared to the generic numbers offered by them. In their lengthy comment, complaining that the HIS has been subject to unprecedented review, they still fail to answer these points. When the Applicant does try to deal with specific questions they come up with solutions like HGV wing mirrors overlapping car ones or could be folded in during transit. This could give a clue as to why unprecedented review is required.

The Applicants, together with Norfolk Vanguard and Hornsea 3, plan to force many thousands of construction traffic movements through the centre of Cawston on the inadequate B1145 are unprecedented. Having an effective Highway Intervention Scheme for Cawston is of pivotal importance for the success of all three projects as well as for the village and its residents. The Applicant should welcome unprecedented scrutiny because if they are unable to bring forward practical solutions to the numerous and valid concerns we have raised now, how can their assurances that solutions will be found post consent be relied upon?

Despite the “unprecedented” scrutiny of the HIS the Applicant still fails to respond to our legitimate and well-founded concerns. Earlier in the inquiry the Applicant produced maps showing swept path diagrams to support their claims that, despite all the evidence, the B1145 in Cawston and their deluded plan for passing spaces would be safe and effective. Now, as it becomes clear that the passage of more than a hundred vehicles with loads 3.3 metres wide through the village is proposed, the Applicant does not see the need to produce revised swept paths.

It is not difficult to imagine why the Applicant does not want to produce diagrams which will provide additional evidence that the HIS is even less feasible and threatens the safety and sustainability of our village. It appears the Applicant’s tactic has become to sit out the Planning Enquiry and hope bland assertions that remaining issues will be dealt with “post consent” will satisfy the inspection team and Secretary of State.

The Applicant suggests that, while the period of the works is shown as 6 years, the duration of HGV demand will be much less. Their figures are 22 months for Vanguard/Boreas and 11 months for Hornsea 3. It is hard to judge the worse case; 22 months (31% of the time) with the projects overlapping or 33 months (46%) if they operate at separate times. Either way, it is hard to judge this as “much less” from the residents’ standpoint.

Under either scenario the cumulative impact of construction traffic on our community has not been fully assessed and is not adequately mitigated by the flawed Highway Intervention Scheme. The Applicant has consistently underplayed the cumulative impacts of these cable route schemes, tried to look at each one in isolation and is now trying to pass the buck on Equinor to the ExA for that scheme.

The Applicant’s solicitor, in REP17-001, refers to the HIS as “approved”; we suggest this is premature. Norfolk County Council may have called it “technically feasible”, whilst stating their preference for the Applicant’s Option 2 haul road diversion route, but we argue that the HIS as now proposed is effectively a new scheme, being examined here for the first time, and is still awaiting the result of your independent deliberations.

Even at the end of an extended inquiry, there are many unresolved issues, including access to White House Farm and the impact of Hornsea Three abnormal loads (the ones the Applicant assured us would not be happening).

A document from NCC, recently published on the Hornsea Three website, states:

“Norfolk County Council has no objection to the proposed amended text, however the new Requirement 18(4) and 18(5) committing to ‘revised details’ may cause confusion and raise an unrealistic expectation among the local community as to the scope of the revised proposals.

We have worked with Hornsea 3; Norfolk Vanguard and Norfolk Boreas to ensure the Cawston Highway Intervention Scheme submitted as part of the Boreas examination works for all three projects either individually or cumulatively. Accordingly we wonder if the text might be amended to make it clear that the revised proposals will be based upon the scheme developed through the Boreas examination.”

We find it most concerning that NCC’s priority seems to be arriving at a scheme which “works for all three projects”, with no mention of residents, apart from the fear of raising unrealistic expectations.

After our recent meeting with H3, when they told us they were in discussion with NCC about their abnormal load proposals, we wrote to NCC asking them for an indication of their position. They replied:

“We have not been made aware of this proposal ... We received a brief email from the consultants saying they wish to speak to us, but not what about.”

We await the outcome of any meeting with some trepidation. Their recent response is evidence that the “revised proposals” referred to by Norfolk County Council have not included consideration of Hornsea 3’s abnormal load proposals.

In REP17-017 Broadland District Council confirms that the SoCG v5, submitted at Deadline 10, is final. This is the document which mentions the possible 4dBA noise impact which is still an outstanding issue and unmitigated.

Several other Interested Parties have already referred to the recent National Grid report which concludes that an Offshore Transmission Network (OTN) would save the consumer £6 billion over time, and avoid the onshore disruption and impacts that the Applicant seems hell bent on inflicting upon our rural communities, with not a penny of compensation.

Surely it is time for common sense to prevail; we urge you to recommend rejection of the onshore element of this Application in favour of a properly planned OTN.

In conclusion, and with apologies to Rudyard Kipling, we think that the position regarding the Cawston HIS can be summarised as follows:-

IF your drivers adhere to their enhanced training and the 20mph limit, and
IF all other drivers (without the benefit of extra training) do the same, and
IF those other drivers avoid platooning, even when Hornsea 3's abnormal loads are negotiating their way along the B1145 through Cawston's pinch points and the two inadequate bridges, and
IF all drivers are able to speed read and respond to the plethora of signs, and
IF all drivers yield at the designated points, and
IF a 20mph area with no new features apart from a few painted lines and signs can perform as a "zone", and
IF the Applicant can find HGVs with the dimensions shown on their drawings, including mirrors, and
IF pedestrians are able to take refuge behind parked cars, unless those have been removed by Hornsea 3 to get their abnormal loads through, and
IF residents are able to park the same number of vehicles when an area is reduced by a significant amount, and
IF the residents of White House Farm do not try to enter or leave their property during working hours, and
IF the weather stays dry throughout the project so that HGVs have a chance to stop safely within a 50m sight line, and
IF delivery drivers, including fuel oil tankers delivering to all the properties on Cawston High Street, can find a designated space to park in, and
IF Hornsea Three abnormal loads can transit Cawston without causing damage and gridlock
THEN your scheme may be "technically feasible".

As a third National Infrastructure planning inquiry draws to a close it is a good time to reflect upon the eye-watering levels of expenditure by the Applicants and the many interested parties. The enormous voluntary response from many of Norfolk's Parish Councils with communities threatened by this application should also be considered. For many small councils this has become a David and Goliath contest, when it could, and should, have been an opportunity to cooperate to secure a better solution for our County, our communities and the Applicant. There are no clear winners in this confrontational process. If their application is approved Vattenfall still need to construct their cable route and to do that will rely on the forbearance and cooperation of village communities who they have spent the last two years antagonising.

At the end of this inquiry, the Applicants' proposals are largely unchanged from their original application. Having given up patronising us in Cawston during the Norfolk Vanguard planning inquiry, Vattenfall's approach to our community has been focused on trying to justify their plans whilst dismissing, ignoring and denigrating local concerns and our proposal for an alternative route for construction traffic which avoids the B1145 through Cawston and its inadequate bridges.

The Applicant appears confident that it will be given the green light to operate with impunity, however impractical or dangerous their plans are for Cawston. It seems they believe there is no need to reach a compromise which can reduce or remove their impact on our village community. The Applicant could still make creative use of the haul road they are constructing alongside their cable route and avoid Cawston and the other bottlenecks on the B1145.

To approve this application with an inadequate Highway Intervention Scheme to address the undoubted cumulative impacts of construction traffic in Cawston would be a tragedy for the village and the surrounding area, made all the worse because those impacts are avoidable.

Cawston Parish Council

12th October 2020