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Your ref 3/2021/0660-0661
Our ref 3/2021/0660-0661/DRW1
Date 25th October 2021

Dear Sir/Madam,

Application No: **3/2021/0660 AND 3/2021/0661**

Location: **BOWLAND SECTION AND MARL HILL SECTION. WORKS AT VARIOUS LOCATIONS.**

Proposal: **PROPOSED WORKS FOR AND USE OF REPLACEMENT SECTION OF AQUEDUCT, INCLUDING EARTHWORKS AND ANCILLARY INFRASTRUCTURE INCLUDING: A NEW VALVE HOUSE BUILDING WITHIN FENCED COMPOUND WITH PERMANENT VEHICULAR ACCESS PROVISION. WITH THE INSTALLATION OF A TUNNEL PORTAL AND AN OPEN CUT CONNECTION AREA WITHIN A TEMPORARY CONSTRUCTION COMPOUND, TO INCLUDE SITE ACCESSES, SOTRAGE AREAS, PLANT AND MACHINERY, AND DRINAGE INFRASTRUCTURE AND A TEMPORARY HAUL ROUTE WITH BRIDGE OVER THE RIVER HODDER. IN ADDITION, A TEMPORARY HAUL ROUTE WITH BRIDGE OVER THE RIVER RIBBLE (AS ONE OF TWO OPTIONS FOR VEHICULAR ACCESS TO THE TEMPORARY CONSTRUCTION COMPOUND); A SERIES OF LOCAL HIGHWAY WORKS TOGETHER WITH A TEMPORARY SATELLITE PARK AND RIDE FACILITY AND A VEHICLE MARSHALLING AREA.**

I refer to the above application and would like to thank you for the opportunity to provide comment on the proposal.

Summary

These statutory comments provide an interim response with consideration for all relevant information uploaded on the Ribble Valley Planning Portal in July 2021. These include a Transport Assessment, a draft Construction Traffic Management Plan and other relevant plans and documentation. Currently, there are a number of outstanding matters and information required from the applicant in order for the Local Highway Authority (LHA) to fully understand the impacts of this proposal and provide final comments.

When the necessary further information is presented, I expect to be able to conclude matters in an updated response. However, LCC Highways position at this time is to recommend that the Local Planning Authority (LPA) does not take this application to committee for a decision until all outstanding information is presented and considered by the LHA. If the application was to be taken to planning committee at this stage, it would not have LCC Highways support.

Phil Durnell
Director, Highways and Transport,
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Background

The HARP is deemed necessary to enhance the resilience of the existing Haweswater Aqueduct, an essential part of United Utilities' water supply network in the North West region. The existing 110 km Haweswater Aqueduct (constructed in 1955) takes raw water from the Haweswater Reservoir in the Lake District National Park to Watchgate Water Treatment Works (WTW) for treatment. From Watchgate WTW the aqueduct conveys treated water to customers in Greater Manchester, Cumbria and Lancashire.

The proposed tunnelling works consist of the replacement of an existing aqueduct using a Tunnel Boring Machine (TBM) below ground level with short open-cut surface trenching sections at each end making connections back to the existing aqueduct. The TBM will commence boring at the launch compound and be received at the reception compound. Tunnel arisings from the bore will be bought to the surface at the launch compound.

The proposed mine grouting works consist of the filling of any exiting voids from former mine workings along the tunnel route to stabilise the workings at the tunnel horizons and to minimise the potential for future mine collapse. Liquid grout will be used to infill voids from the surface, prior to the area being tunnelled. This will require the drilling of a series of boreholes, through the soils and into bedrock to intersect the target mineral horizons and abandoned mine workings.

These applications seek consent for the Bowland Section and Marl Hill Section, consisting of new pipeline, forming part of the HARP. Within Ribble Valley, the Bowland and Marl Hill sections consists of 3 compound areas:

- Newton-in-Bowland Compound
- Bonstone Compound
- Braddup Compound

The applicant accepted LCC Highways' offer of pre-application service. This process has been ongoing for some time, with good progress in a number of areas. It is important to note many concerns during the pre-application stage remained outstanding, but the applicants' targets required that an application was submitted.

As the Local Highway Authority (LHA), the comments below represent Lancashire County Council's (LCC) statutory comments on the highway and transport aspects, for each of the working areas within the Ribble Valley district. The issues highlighted in these comments have been identified during the preapplication stage and are not new issues. These comments consider all the highways and transportation information uploaded to the planning portal or provided to LCC by the applicant's Transport Consultant, Jacobs.

Newton-in-Bowland Compound:

This proposed compound would be the launch compound for the TBM to the Lower Houses Compound in Lancaster (circa. 9km away). Tunnel arisings from the bore to the Lower Houses compound will be brought to the surface at this compound. This compound would be a temporary working area, required for approximately 7 years, with an expected commencement of 2023, and a permanent valve house structure with associated ancillary infrastructure is proposed to remain at the site following completion of the works.

The compound is located approximately 850m west of Newton-in-Bowland in Ribble Valley and the existing site layout is shown in drawings 80061155-01-JAC-TR3-97-DR-C-00003 and 80061155-01-JAC-TR3-97-DR-C-00010. The proposed compound falls within a rural area,

located on agricultural land. Some properties exist off Newton Road, on the southwest corner of the northern section of the proposed compound.

The indicative layout of the proposed compound area during the construction phase of the tunnel is shown on the planning drawings RVBC-BO-APP-004-05_01 and RVBC-BO-APP-004-05_02. The proposed site layout upon completion of the works are shown on Drawings: 80061155-01-JAC-TR3-97-DR-C-00004 and 80061155-01-JAC-TR3-97-DR-C-00011.

Bonstone Compound:

This proposed compound would be the reception compound for the TBM from the Braddup Compound. This compound would be a temporary working area, required for approximately 4 years, with an expected commencement of 2024, and a permanent valve house structure with associated ancillary infrastructure is proposed to remain at the site following completion of the works.

The proposed compound is located approximately 1.5km south of Newton-in-Bowland and approximately 7km north of Waddington, within a rural area and located on agricultural land. The existing site layout is shown in drawings 80061155-01-JAC-TR4-97-DR-C-00001 and 80061155-01-JAC-TR4-97-DR-C-00009.

The indicative layout of the proposed compound area during the construction phase of the tunnel is shown on the planning drawings RVBC-MH-APP-004-05_01 and RVBC-MH-APP-004-05_02. The proposed site layout upon completion of the works are shown on drawings 80061155-01-JAC-TR4-97-DR-C-00002 and 80061155-01-JAC-TR4-97-DR-C-00010.

Braddup Compound:

This proposed compound would be the launch compound for the TBM to the Bonstone Compound. This compound would be a temporary working area, required for approximately 4 years, with an expected commencement of 2024, and a permanent valve house structure with associated ancillary infrastructure is proposed to remain at the site following completion of the works.

The compound is within a rural area, located on agricultural land alongside Sandy Ford Brook and approximately 2.5 km northwest of Waddington. The existing site layout is shown in drawings 80061155-01-JAC-TR3-97-DR-C-00003 and 80061155-01-JAC-TR3-97-DR-C-00010.

The indicative layout of the proposed compound area during the construction phase of the tunnel is shown on the planning drawings RVBC-MH-APP-004-05_03 and RVBC-MH-APP-004-05_04. The proposed site layout upon completion of the works are shown on Drawings 80061155-01-JAC-TR4-97-DR-C-00004 and 80061155-01-JAC-TR4-97-DR-C-00012.

Comments on Specific Elements of the Transport Assessment (TA) and the Environmental Statement (ES)

This section of the comments will address the following matters for the compounds:

A. Access Strategy
B. Comments on other elements within the overall Transport Assessment
C. Internal Site Layout, Parking Standards/Parking Provision and SUDS
D. S278 Works
E. Planning Obligations (s106 Planning Contributions)
F. Construction Traffic Management Plan
G. Road Condition Monitoring and Maintenance Strategy (HoTs)
H. Funding for a full LCC post for the duration of the project

(A) Access Strategy

Proposed Routing Strategy:
The proposed vehicular access strategy to serve the compounds during the construction stage will be from dedicated accesses off the B6478. Two routes from/to the A59 to/from B6478 have been presented within the application. The Design and Access Statement states that "in the event planning permission is granted, only the CTMP for the Haulage Route Option selected as preferred through the application determination process would be included in the approved working programme."

The comments below set out the proposed access strategy and routing to the compounds and have been divided for the two sections, i.e. 'Between the A59 and the B6478 (North of Waddington)' and 'Between the B6478 (North of Waddington) and the Newton-in-Bowland compound access (most northern compound)'. Quoted text is taken from the Design and Access Statement and draft Construction Traffic Management Plan which sets out the proposed access strategy and routing to the Newton-in-Bowland compound as follows:

Between the A59 and the B6478 (North of Waddington):
Two routes from this section are presented within the application. Haulage Route Option 1 makes use of the existing road network, while Haulage Route Option 2 proposes a temporary crossing over the River Ribble.

Routing to and from the compounds from the A59 using Haulage Route Option 1 is shown on drawing LCC_RVBC-BO-FIG-016-002 Page 3 of 4 and Page 4 of 4. Routing to and from the compound from the A59 using Haulage Route Option 2 is shown on drawing LCC_RVBC-BO-RC-FIG-016-002 Page 2 of 2.

Haulage Route Option 1
The proposal for Haulage Route Option 1 uses two routes (A and B) to access the B6478 at the north of Waddington from the A59 south of Clitheroe. A is proposed for construction vehicles that can pass beneath a low railway bridge on the B6478 in Clitheroe (3.5m height restriction) and B is proposed for vehicles over 3.5m high.

Route 1A - HGVs under 3.5 m in height
'Access to and from the proposed Newton-in-Bowland Compound for light vehicles and HGVs under 3.5 m in height would be gained via the A59, Pimlico Link Road, Chatburn Road and through Waddington along the B6478 Well Terrace/Waddington

Road/Clitheroe Road/Slaidburn Road/Hall Gate Hill (hereafter referred to as "Route 1A").'

Route 1B - HGVs over 3.5 m in height (including Abnormal Indivisible Loads (AILs))
'HGVs over 3.5 m in height and AILs would access the site through Clitheroe via the A59, Pimlico Link Road, Clitheroe Road, Crow Trees Brow, Ribble Lane, East View, Grindleton Road, West Bradford Road and along the B6478 Slaidburn Road (hereafter referred to as "Route 1B").'

Haulage Route Option 2
'Haulage Route Option 2 proposes a temporary haul road crossing the River Ribble adjacent to existing West Bradford Bridge to access the B6478 at the north of Waddington from the A59 south of Clitheroe. The temporary haul road for the Ribble crossing would require the creation of temporary new junctions with West Bradford Road (Clitheroe, south of the River Ribble) and West Bradford Road (Waddington, north of the River Ribble).' All construction traffic would use this route, avoiding the need for construction vehicles to use roads through the villages of Chatburn, the centre of Waddington and the centre of Clitheroe.

Between the B6478 (North of Waddington) and the Newton-in-Bowland compound access
Along the B6478, several road widenings and some passing places are proposed. Passing places will allow a vehicle to wait at the side of the carriageway while allowing continued full use of the carriageway. Road widenings will provide enough space for a vehicle to wait in the carriageway to allow vehicles in the opposite direction to pass.

The approach for HGVs at highway width constrictions (i.e. vehicles in one direction wait to allow oncoming traffic to pass) relies on driver behaviour and provision of adequate forward visibility. This imposes delays on road users at such locations. Delays incurred generate driver frustration which may compel poor driving behaviour and subsequent safety implications. Consideration of additional measures (speed restrictions, road user compliance etc.) is required to provide satisfactory proposal. I provide further details on these issues in the comments below.

LCC have been discussing the access and routing proposals for the Ribble Valley compounds with UU for over 18 months. During this time, we have been very clear that the routes proposed are fit for the current uses that they facilitate. However, the increased use of these routes for construction traffic over an extended construction period presents significant challenges. These would be in terms of operation of the proposed routing strategies, the safety of all users and the capability of these roads to withstand the impact of multiple Heavy Goods Vehicles (HGV) movements at all times of the year, without the need for extensive maintenance that may result in prolonged periods of road closure. As presented, it has not been demonstrated by the applicant that these issues can be suitably addressed and overcome.

The fundamental issues that remain outstanding with the proposed routing strategy are highlighted below *(note: all are influenced by the construction traffic numbers forecast)*. Before these issues are highlighted, we have listed and commented on the documents that appear to provide information relating to the access strategy.

Appendix B1 of the draft CTMP for Haulage Route Option 1 (through Waddington and Chatburn) provides swept path analysis of the full route and the names, location and extents of road widenings and passing places.
From the A59 to the north of Waddington, via Route 1A (through Waddington) a 4-axle rigid vehicle is tracked in both directions.

From the A59 to the north of Waddington, via Route 1B (through Chatburn) the tracking is provided for the low loader vehicle with either a step trailer or 40' artic vehicle in the opposite direction. **We would request clarification on the use of varying vehicles.**
From the north of Waddington to the proposed junction off the Hallgate Hill B6480, tracking is provided for the 4-axle rigid vehicle in both directions and a 4-axle rigid vehicle with a low loader vehicle in the opposite direction.
(Note i: all swept paths to include the additional requirement of wing mirrors in order to demonstrate vehicles can pass without obstruction)
(Note ii: The vehicle tracking suggests that low loader cannot travel in both directions at the same time. If this option were to be taken forward, we would need to have a clear understanding of how vehicle movements will be controlled)

Drawing RVBC-BO-FIG-V5-P1-001 (Highways Works - Master Plan Page 1 OF 1) provides a plan of the full routes with the labelled road widenings, passing places, HGV Holding Area, Park and Ride area and Chatburn Parking Restriction. **I would note that the necessary parking restriction proposed on West Bradford road (shown in Figure B-2-15 of the CTMP) is missing from Highway Works Masterplan drawing and from the Offsite Highway Works drawings.**

Drawings RVBC-BO-APP-004-12_01 to 10 (Highways Works Proposals Sheets 1 to 10) show wider details of the road widenings and passing places, with the types of works labelled. Drawings RVBC-BO-APP-004-12_11 to 12 (Highways Works Proposals Sheets 11 to 12) show the typical passing place and road widening cross sections.

Drawing RVBC-BO-FIG-V5-P1-002 (Environmental Assessment Figures Page 1 to 33) show the proposed road widenings, passing places, satellite compound and temporary parking area, with the Environmental Constraints (including PRoWs and Cycle Routes) and lists the likely impacts and mitigation/reinstatement.

Drawing 80061155-01-UU-TR3-XX-DR-C-00045 shows the Park and Ride Facility and HGV Holding Area site layout.

Within the CTMP, there are examples of physical works (i.e. "two-way control at the pinch points around the 3 Millstones in West Bradford"). To understand the location and the need for these proposals, they should be marked on the swept path analysis drawings.

Volume 5 of the ES (Newton-in-Bowland and Marl Hill Compounds Highways Works Part I: Environmental Assessment (excluding Ecology)) sets out the design approach for the proposed offsite highway works. While this document sets out the design criteria for passing places, it is unclear how the judgements have been made in regard to sight stopping distance and drivers' ability to judge whether to use a passing place or continue when forward visibility does not assist the decision (evidence base is needed to support any engineering judgements that can stand up to external scrutiny). The location of the passing places must account for driver visibility of oncoming vehicles and drivers' judgements of the need to use the road widenings, in the placement of places. This information is currently not provided but required.

We have set out our comments with regard to the safe operation of the proposed route, based on the multiple documents listed above. The proposed routes have been split into smaller sections for ease of reference.

a. A59 (M6 J31 to Pimlico Link Road) (Both Haulage Route Options)
   - I would note that no highway improvement works are proposed along this section of the routing strategy. No swept path analysis of this section appears to have been provided. I do not expect there to be issues for the accommodation of the proposed vehicles along this section.
   - I would however, reraise concerns that were highlighted during the preapplications stage (via email on 17th November 2020), regarding the proposals at the A59 / Pimlico Link Road junction. While we do expect capacity issues at the junction, we do have concerns regarding the impact on the safety at the junction resulting from the cumulative number of right turn movements out from Pimlico Old Road and the right turns in from the A59. Clearly, opportunities for slow moving HGV's to identify safe gaps in the 60mph A59 traffic may lead to increased delays for users but it may also impact on safety. The applicant must identify the impacts on safety at this location and provide a safe and suitable solution, if required.

b. A59 to B6478 north of Waddington (through Clitheroe centre and Waddington) (Haulage Route Option 1)
   - I would note that no highway alterations / improvements are proposed along this section. This is surprising given LCC Highway's previous comments, in particular, in regard to mitigation that would clearly be necessary through Waddington.
   - I would note that cars are frequently parked on A671, and while the tracking suggests that the road will be able to accommodate the vehicles in both directions, it does not give consideration for parked vehicles.
   - While the narrow sections of the route (Brungerley Bridge and priority passing places) are highlighted, there do not appear to be proposals to overcome the impacts of the construction traffic at these locations.
   - Along the B6478, through Waddington, there are sections of road with no pedestrian footway provision and cars are frequently parked at these locations. Construction vehicles will not be able to use the highway simultaneously at these locations and these issues do not appear to be shown or highlighted in the proposals, nor any solution proposed.

     The information presented has not demonstrated that this route will provide safe and suitable access for the HARP construction traffic. As such, LCC Highways cannot support this access strategy, as presented.

c. A59 to B6478 north of Waddington (through Chatburn) (Haulage Route Option 1)
   - RW01 – proposed at the Pimlico Link Rd / Chatburn Rd roundabout. There are no details of the form that this road widening will take. The widening appears to simply be based on the swept path plan and therefore accommodating the tracked vehicles. LCC Highways require more detail of what is proposed and how this can be delivered. We would also require confirmation that this proposed widening would also accommodate the TBM.
   - I would request clarification in the gap in tracking on FIGURE B - 1 – 10
   - **While a small label on drawing RVBC-BO-FIG-V5-P1-001 indicates a Parking Restriction in Chatburn, I have been unable to identify any further detail regarding this proposal (e.g. highlighting the extent of the proposed parking restriction and/or proposed provision for displaced parking).** Image 3 on FIGURE B - 1 – 10 highlights the need for the parking restriction.

- Between PR01 and RW02 the tracking suggests that the two vehicles cannot be accommodated on the highway, yet there are not proposals to overcome this.
- RW02 - there is no detail that clearly explains the issue and the detail of the proposal and how this overcomes the issue. I would note that RW02 is over a short distance, whereas the tracking suggests that that widening is needed up to RW03.
- RW03 – even with the proposed widening, two-way movements of vehicles will not be possible over the bridge, there does not appear to be any specific proposals to overcome this issue. **The CTMP lists a number of possible solutions (two-way control or three-way control) at a number of such locations, but does not provide specific details, locations or commitment to a specific measure which satisfactorily addresses the issue. LCC Highways do not agree with the CTMP which states that 'the current proposals are not exhaustive and will be subject to detailed design including appropriate independent safety audits'. This information and analysis is required at this stage.**
- RW04 – refer to comment on RW02. Tracking suggests that two vehicles cannot be accommodated up to RW05.
- RW05 – while this widening will allow the vehicle to turn at the junction, two vehicles cannot be accommodated just past the junction. This section is also a cycle route.
- RW06 – refer to comments above on RW02.
- RW07 – refer to comments above on RW02.
- Along Grindleton Rd and West Bradford Rd there are several locations where two vehicles cannot be accommodated, yet there are no proposals to overcome this.

The information presented has not demonstrated that this route will provide safe and suitable access for the HARP construction traffic. As such, LCC Highways cannot support this access strategy, as presented.

d. A59 to B6478 north of Waddington (Avoiding Chatburn, Clitheroe Centre and Waddington Centre) <u>(Haulage Route Option 2)</u>
   - Swept path analysis for the proposed haul road over the River Ribble has not been provided. It is expected that the haul road will be wide enough to accommodate two-way movements of the large HGVs.
   - While swept path analysis from the haul road junction on the east-west West Bradford Road to the compound is provided, we require swept path analysis from the A59 to the haul road junction off the north-south West Bradford Road.
   - Proposed Junction off north-south West Bradford Road:
     - The proposed access arrangements are shown in drawing 27070CQ-JAC-XX-DR-C-TR4_GA-1212. The dimensions of the proposed access and the visibility splays are shown in drawing B27070CQ-JAC-XX-DR-C-TR4_VS-1010, and should be protected by a suitably worded condition, for the duration of the construction works. Swept Path Analysis of the TBM is shown in drawing B27070CQ-JAC-XX-DR-C-TR4_VT-1129.
     - There is an existing bus stop north of the proposed junction. The impacts on this bus stop do not appear to have been assessed, nor its impact on the junction and visibility.

- Proposed Junction off east-west West Bradford Road:
    - The proposed access arrangements are shown in drawing B27070CQ-JAC-XX-DR-C-TR4_GA-1213. The dimensions of the proposed access and the visibility splays are shown in drawing B27070CQ-JAC-XX-DR-C-TR4_VS-1011, and should be protected by a suitably worded condition, for the duration of the construction works. Swept Path Analysis of the TBM is shown in drawing B27070CQ-JAC-XX-DR-C-TR4_VT-1131

e. West Bradford Rd / B6478 Slaidburn Rd Junction <u>(Both Haulage Route Options)</u>
    - No offsite highway works are proposed at this section within the Highways Works Proposals Sheets 1 to 12. However, Figure B-2-15 of the CTMP includes a proposal for this area which is considered in the bullet points immediately below.
    - A hatched area is shown on West Bradford Rd and Slaidburn Rd as 'parking restriction'. The restriction is proposed on an area between two points that are labelled "Point at which two Low Loaders can pass". I would note however, that prior to this location on West Bradford Rd (at approx. 7690m chainage) the tracking shows that two low loaders cannot pass.
    - While the parking restriction covers a distance of over 400m, there does not appear to be any provision for the displaced parking. Without this parking provision, vehicles will be displaced to other locations that is likely to impact the safety of all road users and the unrestricted movements of the construction vehicles.
    - There is a lack of footway along sections of West Bradford Rd, and there are no proposals to ensure the safe movements of pedestrians along this section.
    - A temporary traffic signal control is proposed at the junction, for the duration of the project (up to 7 years). This will require the implementation of a traffic regulation order (TRO) or a temporary traffic regulation order (TTRO). The provision of traffic signals at this location can be expected to introduce delay to all users of the highway network, including construction traffic. **The detail of the traffic signal layout and operation needs to be clearly understood in order that it can be demonstrated that this proposal can operate safely (driver compliance at all times of the day/week). We would require clarification on whether it is the applicants' intention that the traffic signals are a permanent fixture for the full duration of the HARP project. I would note that these proposals are dependent on the success of the TRO application. This is a significant risk to the project as this fall beyond the planning process. The applicant needs to demonstrate that they can suitably manage this risk, with any proposals clearly set out within the CTMP.**
    - Figure B-3-05 of the CTMP provides swept path analysis of the TBM at this junction. We would request a clearer plan that shows this analysis, as the current tracking seems very tight at this location (where pedestrian footway is minimal, and buildings extend up to the highway).

The information presented demonstrates that Haulage Route Option 2 has considerable merits in removing the need for construction traffic to traverse through Chatburn, the centre of Clitheroe and the centre of Waddington. However, for the proposals of Haulage Route Option 2 to be made acceptable, further details are required to demonstrate safe and suitable access.

f. B6478 north of Waddington to B6478 Hallgate Hill Haul Road Access (Comment on the individual compound accesses are provided under 'Construction Accesses' below)
   - RW08 – refer to comment on RW02. I would note that the tracking shows two vehicles cannot be accommodated north and south of RW08.
   - RW09 - refer to comment on RW02. I would note that the tracking shows two vehicles cannot be accommodated north of RW09.
   - RW10 - refer to comment on RW02.
   - RW11 - refer to comment on RW02.
   - RW12 - refer to comment on RW02. I would note that between RW11 and RW12 the tracking shows two vehicles cannot be accommodated.
   - RW13 - refer to comment on RW02. I would note that between RW12 and RW13 the tracking shows two vehicles cannot be accommodated.
   - RW14 - refer to comment on RW02. I would note that between RW13 and RW14 the tracking shows two vehicles cannot be accommodated.
   - RW15 - refer to comment on RW02. I would note that between RW14 and RW15 the tracking shows two vehicles cannot be accommodated.
   - RW16 - refer to comment on RW02. I would note that between RW15 and RW16 the tracking shows two vehicles cannot be accommodated.
   - RW17 - refer to comment on RW02. I would note that between RW16 and RW17 the tracking shows two vehicles cannot be accommodated.
   - RW18 - refer to comment on RW02.
   - RW19 - refer to comment on RW02.
   - RW20 - refer to comment on RW02. I would note that between RW19 and RW20 the tracking shows two vehicles cannot be accommodated.
   - RW21 - refer to comment on RW02. I would note that the tracking shows two vehicles cannot be accommodated south of RW21.
   - PP01 – for a considerable distance north of PP01, the tracking shows two vehicles cannot be accommodated.
   - RW22 - refer to comment on RW02. I would note that between PP01 and RW22 the tracking shows two vehicles cannot be accommodated.
   - RW23 - refer to comment on RW02. I would note that between RW22 and RW23 the tracking shows two vehicles cannot be accommodated. There is also no proposal for the clear pinch point at the cattle grid north of RW23. ***(Note: at all locations where there are cattle grids on the access routes, a condition survey will be required. This should identify the structural suitability of existing cattle grids to be able to accommodate the additional loading of the proposed construction vehicles).***
   - RW24 - refer to comment on RW02. I would note that between RW23 and RW24 the tracking shows two vehicles cannot be accommodated.
   - RW25 - refer to comment on RW02. I would note that between RW24 and RW25 the tracking shows two vehicles cannot be accommodated.
   - PP02 - I would note that between RW25 and PP02 the tracking shows two vehicles cannot be accommodated.
   - Between PP02 and RW26 a road widening line is shown but not labelled.
   - RW26 - refer to comment on RW02. I would note that between RW25 and RW26 the tracking shows two vehicles cannot be accommodated.
   - RW27 - refer to comment on RW02. I would note that between RW26 and RW27 the tracking shows two vehicles cannot be accommodated.
   - RW28 - refer to comment on RW02. I would note that between RW27 and RW28 the tracking shows two vehicles cannot be accommodated.

The information presented has not demonstrated that this route will provide safe and suitable access for the HARP construction traffic. As such, LCC Highways cannot support this access strategy, as presented.

Note: When the strategy with regards to the passing places and road widenings is agreed with the LHA, it will be on the assumption that the proposals will be reinstated upon completion of the HARP project. (This to be controlled by condition). However, LCC Highway will consider if some of the road widenings or passing places provide benefits and should be retained following the HARP project.

g. Park and Ride Facility and HGV Holding Area
   - We would require confirmation that the access to the HGV holding area will be able to accommodate the expected HGVs. The HARP proposals present a significant intensification over the existing use.
   - Swept path analysis to/from the Park and Ride area from/to the Pimlico Link Rd / Chatburn Rd roundabout has not been provided.
   - We would require details regarding the existing capacity and existing use of the parking area, to ensure sufficient parking is available for HARP vehicles.
   - We would request details on the anticipated vehicle movements between the Park and Ride area and the Pimlico Link Rd / Chatburn Rd roundabout.

h. Proposed Speed Limits:
   - Figure B-2-16 of the CTMP indicates proposals for 30mph speed limits on all of the proposed traffic routes, from the A59 to the haul road junction on Hallgate Hill B6478.
   - While the CTMP states that "appointed construction contractors will adopt a robust monitoring system to ensure all proposed speed limits are adhered to. This will be undertaken by recording physical measurements of vehicles on the highway at random intervals", there are no proposal that ensure the compliance of the speed limits by all vehicles (construction and non-construction).
     This will require the implementation of a traffic regulation order (TRO) or a temporary traffic regulation order (TTRO). I would note that these proposals are dependent on the success of the TRO application. This is a significant risk to the project as this fall beyond the planning process. The applicant needs to demonstrate that they can suitably manage this risk, with any proposals clearly set out within the CTMP.
     Enforcement of the proposed speed limits may be problematic due to the number of resources required to provide a regular presence in the remote location. While the applicant and their contractor could put in place extensive measures to control the construction site traffic, they need to demonstrate how the proposed speed limits will be self-enforcing. Simply signing a route with a reduced speed limit will not achieve the desired outcome. This is particularly important when considering the highway in the vicinity of the proposed construction compound accesses. This issue is dealt with further within the 'Construction Accesses' section below.
   - **LCC Highways require further details on how the proposed speed limit can be shown to operate safely in practice, with all vehicle compliance at all times of the day/week, i.e. at times when no construction traffic will be utilising the route.**

Construction Accesses:

Newton-in-Bowland:

The proposed vehicular access strategy to serve the compound during the construction stage will be from a dedicated temporary haul road off Hallgate Hill B6478 (south of the village of Newton), to Newton Road (west of the village of Newton). The haul road would remove the use of narrow roads through the centre of Newton-in-Bowland. ***(Note: the applicant needs to clarify whether vehicles need to go through the village of Newton-in-Bowland for the establishment works of the haul road. If vehicles will need to travel through the village, this impact needs to be understood at this stage.)*** The temporary haul road would require the erection of clear span bailey bridge style crossing of the River Hodder. For the proposed junction off Hallgate Hill B6478, the proposed access arrangements are shown in drawing RVBC-BO-APP-004-11_02. The dimensions of the proposed access and the visibility splays are shown in drawing B27070CQ-JAC-XX-DR-C-TR3_VS-1006, and should be protected by a suitably worded condition, for the duration of the construction works. Swept Path Analysis of the TBM is shown in drawing B27070CQ-JAC-XX-DR-C-TR3_VT-1112.

A staggered junction is proposed on Newton Road, providing connection between the haul road and compound. For the proposed staggered junction on Newton Road, the proposed access arrangements are shown in drawing RVBC-BO-APP-004-11_01. The dimensions of the proposed access and the visibility splays are shown in drawing B27070CQ-JAC-XX-DR-C-TR3_VS-1002 and B27070CQ-JAC-XX-DR-C-TR3_VS-1003, and should be protected by a suitably worded condition, for the duration of the construction works. T**he visibility splays are based on 40mph speed limits, which is lower than the current speed limit, yet no proposal to reduce the speed limit at this location are shown in Figure B-2-16 of the CTMP. This requires clarification.** Prior to submission of the application, LCC Highways had been presented with proposals for speed limit reductions at this location. This staggered junction will accommodate large numbers of slow moving fully laden wagons, that will be making the crossing between compound and haul road to the south. The existing speed limit on this comparably straight section of road is currently derestricted. Therefore, it is LCC Highways view that a speed reduction down to 30 mph will be necessary, and the detail should be provided that demonstrate safe and suitable access, with self-enforcing speed limits.

Notwithstanding the drawings and information provided for the proposed staggered junction on Newton Road, there remains the opportunity for a crossroads access arrangement. During preapplication discussions, LCC Highways were provided with a risk assessment (completed by the applicant), which showed a slightly lower risk score for the staggered junction proposal. The applicant needs to consider the number and frequency of anticipated movements to and from the junctions to identify the suitable solution.

While the documents suggest a staggered junction arrangement, the plans would appear to indicate both crossroad and stagger. Clearly this introduced even more conflicts and is a concern. LCC Highways would request further explanation of how the applicant anticipates these site accesses to operate safely in practice.

LCC Highways have previously highlighted the issue of lighting at the compound and haul road access, with consideration for the duration of the HARP project. It is expected that lighting at junctions will be required for safety. A balance need to be struck between the hours of operation, hours of darkness and potential for light pollution. Lighting of junctions during periods of darkness (morning and evening only, not all night) should be considered.

Swept Path Analysis of the TBM is shown in drawing B27070CQ-JAC-XX-DR-C-TR3_VT-1107. We require clarification on the taper towards the village of Newton-in-Bowland, on the

westbound carriageway of Newton Road, when vehicles will not be making this movement. When a scheme drawing has been provided and agreed with LCC Highways, this should be subject to RSA.

Further details will be necessary to ensure the safe operation of this section of Newton Road, with construction accesses to the north and south in close proximity. It is essential that a bespoke wheel washing regime is included in the final layout to ensure debris is not transferred on to the highway network, resulting in safety issues. I would expect any agreed wheel washing procedures to be supplemented with ongoing road sweeping, carried out by the applicant's contractor / subcontractor. **This requirement for wheel washing and road sweeping is necessary at all compound and haul road access locations. In addition, the applicant will need to address <u>additional requirements</u> with regard to winter maintenance (gritting, snow clearance etc.) that will be necessary to maintain safe access, at all times, for the project.**

<u>Bonstone Compound</u>
The proposed vehicular access strategy to serve the compound during the construction stage will be from an existing access off the B6478, which would be modified to accommodate the anticipated construction vehicles. The proposed access arrangements are shown in drawing RVBC-MH-APP-004-11_01. The dimensions of the proposed access and the visibility splays are shown in drawing B27070CQ-JAC-XX-DR-C-TR4_VS-1007, and should be protected by a suitably worded condition, for the duration of the construction works. Swept Path Analysis of the TBM is shown in drawing B27070CQ-JAC-XX-DR-C-TR4_VT-1113. Swept path analysis of other frequent HGV movements need to be provided to ensure that the access accommodates simultaneous movements without the need for vehicles to wait on the highway.

(Note: there is an existing cattle grid immediately west of the B6478 on the proposed access, and there does not appear to be detail on how the cattle grid will operate during the HARP project.)

It is noted that the proposals indicate this section of the B6478 will be reduced to 30 mph for the duration of the HARP project. Again, LCC Highways reiterate the need to ensure all vehicles comply with this reduced speed limit in the vicinity of the compound access. Previously, LCC Highways were provided with plans, albeit showing a 40mph speed limit, for which we provided a number of comments with regard to necessary signing to ensure advanced warning of the access and better compliance with a speed reduction from the current derestricted. Similar information does not appear to be included within this application and is necessary to demonstrate that a safe and suitable access will be delivered.

<u>Braddup Compound</u>
The proposed vehicular access strategy to serve the compound during the construction stage will be from a new access off the B6478, immediately south of an existing access. The proposed access arrangements are shown in drawing RVBC-MH-APP-004-11_02. The dimensions of the proposed access and the visibility splays are shown in drawing B27070CQ-JAC-XX-DR-C-TR4_VS-1008, and should be protected by a suitably worded condition, for the duration of the construction works. For the provision of the visibility splays, telegraph poles are proposed to be relocated and a tree removed. Swept Path Analysis of the TBM is shown in Figure B -3 – 07 of the CTMP. Swept path analysis of other frequent HGV movements need to be provided to ensure that the access accommodates simultaneous movements without the need for vehicles to wait on the highway.

Note: the proposed access off the B6478 will connect to the existing track off the existing access, that is immediately north of the proposed access. The existing access should be closed during the works at the Braddup compound. Again, the expectation will be for full reinstatement to the existing access, upon completion of the works, unless otherwise agreed with the LHA.

As highlighted during the pre-application stage, LCC Highways need to understand gate/security check proposals at the compound and haul road access locations. It is not expected that these accesses will be used by non-HARP project traffic. Therefore, the applicant must demonstrate how vehicles will be accommodated to allow stacking if necessary and to ensure that large vehicles turning off the roads will have unobstructed access.

Post-construction Access:

The proposed accesses to the proposed permanent valve house building and ancillary infrastructure, at each of the compounds, would be taken from existing accesses that currently serve existing United Utilities buildings. New hard surfaced extensions to the accesses would be created to allow operational staff in light vehicles access to the proposed United Utilities infrastructure. The accesses are not intended for public use. The proposed permanent site layout is shown in drawing 80061155-01-JAC-TR3-97-DR-C-00004 for the Newton-in-Bowland compound, drawing 80061155-01-JAC-TR4-97-DR-C-00002 for the Bonstone compound and drawing 80061155-01-JAC-TR4-97-DR-C-00004. **All of the areas to be used for the haul roads serving the compounds and bypassing the village of Newton-in-Bowland, are proposed to be reinstated to original conditions.**

Road Safety Audit (including operational audit)

Clearly as set out above a number of issues have been highlighted with the proposed access strategy and further information is required from the applicant to address these matters.

Once we have a strategy that is considered could potentially work, then a full scheme road safety and operational audit will be required and satisfied. The audit should only be progressed at this stage and not before agreement is reached with LCC Highways. This audit will form part of the application documents and needs to be concluded prior to any determination. The outcomes of the audit are then to be fully incorporated into the CTMP.

Waddington Fell Quarry Site Access Improvement and Traffic Figures

LCC Highways will not be able to provide support of the HARP project until the site access and improvement and traffic figure elements for Waddington Fell Quarry are fully agreed with LPA, in consultation with the LHA.

LCC Highways provided the following comments in regard to the Waddington Fell Quarry planning application. Subsequent information has not been provided to date.

1. *The existing access arrangements are not adequate for the proposal, that will see significant HGV movements to and from the north. Our initial review of ordnance survey maps suggests that the layout, turning radii and width of the existing access cannot accommodate HGV movements in and out of the Quarry simultaneously. These movements must be accommodated to ensure that HGVs are not waiting on the carriageway to access the Quarry, especially during the simultaneous tunnel bores. An improvement scheme at the access, widening the Quarry entrance and improving turning radii to the north is necessary. When the improvement scheme is developed,*

we would expect to see the site access layout with the swept path analysis and visibility splays.

2. *We require a breakdown of the proposed movement values given in this application. This will allow us to understand, within the figures:*
    a. *What are the current and expected ongoing quarry traffic movements (current permission expires December 22, but the Restoration Cross Sections drawing shows sections of stone that is to be removed)?*
    b. *How many of the movements are specific to the HARP and its associated tunnel arisings?*
    c. *What, if any, in these figures are for additional traffic that would have been part of restoration works and would therefore be traffic towards the south and principle network (A59)?*

    Note: in parallel to this request, we will require more detailed breakdown and understanding of the figures currently provided by United Utilities (UU) in regard to the HARP scheme, to ensure that the figures provided by UU and the figures provided by this applicant correspond.
3. *Clearly, accommodating the significant uplift in HGV movements associated with the Quarry restoration proposal (including the HARP tunnel arisings) is a matter of ongoing discussion and will be the subject of wider mitigation, road condition monitoring and maintenance, which is expected to be subject to Grampian conditions linked to the HARP project.*

(B) Comments on other elements within the TA

The following section provides LCC Highways comments on other key elements that have been or should be submitted within the TA.

Traffic Figures and Future Traffic Forecasts
In this section of the note, the comments will cover the following:

B1) Traffic Figures and Traffic Forecasts
    i) Traffic Counts, Traffic Growth and Assessment Years
    ii) Trip Generation
    iii) Distribution / Assignment
    iv) Committed Development and Emerging Development
    v) Junction Operational Assessments
B2) Accident Analysis
B3) Provision for Equestrian, Pedestrian & Cycling, Public Rights of Way
B4) Public Transport Accessibility and Provision
B5) Travel Plan

B1) Traffic Figures and Traffic Forecasts

(i) Traffic Counts, Traffic Growth and Assessment Years
Normally, up to date traffic survey information is required to be collected for key junctions on the local transport network during an agreed neutral month. Due to the impacts of Covid-19, the TA makes use of Automatic Traffic Count surveys (ATCs), Manual Classified Counts (MCCs), DfT Traffic Counts, Lancashire County Council Traffic Counts (LCC ATCs) and Department for Transport (DfT) counts to establish baseline conditions. The traffic counts conducted by the applicant were collected over 24 hours during October and November 2019.

For the Ribble Valley compounds, 2 ATCs (ATC 11 to 12), 4 MCCs (MCC 21 to 24), 8 LCC ATCs and 1 DfT count are provided on the local highway network. The traffic count survey locations are shown on drawing LCC_RVBC-BO-FIG-016-001 Page 4 of 5. (Add in A59) The scope of junctions surveyed are acceptable to LCC Highways and due to the ongoing impacts of Covid-19, the use of 2019 surveys is acceptable.

(Note: LCC Highways raised the need to consider other road users such as cyclists, equestrians, and walkers. The applicant indicated that given the extent of the network full consideration was not possible and would be picked up through consultation with individual user groups and local communities. This approach is not unreasonable but will not give absolute numbers on each part of the network impacted; ***thus, highlighting the significant importance of the road safety and operational audit****.)*

The TA provides the following 6 assessment scenarios that have been used for analysis:
- 0: Baseline Surveys
- 1: Background (Do-Nothing)
- 2: Cumulative Schemes
- 3: Background + Cumulative Schemes
- 4: Construction
- 5: Background + Cumulative Schemes + Construction

In terms of assessment years, the TA sets the baseline year as 2019, and has identified the busiest construction year as 2024 for the construction works in Ribble Valley. Therefore, the background, cumulative and construction impacts are assessed at the links in 2024. TEMPRO growth factors have been applied to derive the 2024 conditions. The approaches with regard to the scenarios and assessment years are acceptable to LCC Highways.

(ii) Trip Generation

Given the numerous construction tasks required for proposed works, spreadsheets were produced (with early contractor involvement) that contained theoretical movements based on construction activities, materials, and waste. For each of the compounds, the type, size, and number of expected vehicles pertaining to tasks from programme of works have been distributed in weekly movements. The movements have been further divided into HGV and light vehicle classes. These movements have been divided over Haulage route 1 (through Clitheroe, Waddington and Chatburn) and Haulage route 2 (proposed Ribble Crossing), and the traffic diagrams are shown in Appendix A2 of the CTMPs for both routes.

The spreadsheet containing the theoretical vehicle movements has not been submitted as part of the planning application. The latest version of the spreadsheet provided to LCC Highways as part of the pre-application discussion is revision "TVM - v6 - 30Jun20". LCC Highways require clarification that this version is the most up to date version that has been used for the planning application.

The traffic diagrams distribute the daily two-way movements over 5 phases:
- Phase 1 Newton-in-Bowland Site Establishment 1.25 years
- Phase 2 Bowland tunnel Drive & Marl Hill Tunnel Site Establishment 1.25 years
- Phase 3 Bowland Tunnel Drive & Marl Hill Tunnel Drive 1.25 years
- Phase 4 Bowland Tunnel Drive & Marl Hill Tunnel Reinstatement 2 years
- Phase 5 Bowland Tunnel Drive Reinstatement 2 years

For ease and clarity, we have divided our review of the traffic movements over 7 sections of the public highway:

1. A59 to B6478 north of Waddington (Haulage Route 1a through Clitheroe centre and Waddington)
    - Peak during Phase 3 (Ave. 79, Max 140 vehicles / day)
2. A59 to B6478 north of Waddington (Haulage Route 1b through Chatburn)
    - Peak during Phase 2 (Ave. 15, Max 52 vehicles / day)

    Note: section to from the HGV Holding area and park and ride facility is omitted, and we would wish to see figures for this section.
3. A59 to B6478 north of Waddington (Haulage Route 2)
    - Peak during Phase 2 (Ave. 90, Max 184 vehicles / day)
4. B6478 north of Waddington to Braddup Compound access
    - Peak during Phase 2 (Ave. 90, Max 184 vehicles / day)
5. Braddup Compound access to Waddington Fell Quarry access
    - Peak during Phase 3 (Ave. 141, Max 268 vehicles / day)
6. Waddington Fell Quarry access to Bonstone Compound access
    - Peak during Phase 2 (Ave. 205, Max 344 vehicles / day)
7. Bonstone Compound access to B6478 Hallgate Hill Haul Road Access
    - Peak during Phase 2 (Ave. 189, Max 328 vehicles / day)

LCC Highways have highlighted to the applicant the need for a comprehensive set of traffic figures that will allow a full understanding of impacts and upon which appropriate conditions can be attached to any approval. As previously highlighted, in addition to the traffic information presented to date, LCC Highways will require the information to be presented in terms of all vehicles (as above), but also in terms of HGV numbers. In addition, we require the information to be presented in terms of hourly averages and maximums for both HGVs and all vehicles.

Turning Diagrams for the assessment of Key Access Junctions
Turning diagrams have been provided for the compound's accesses and the Hallgate Hill haul road access. **We require this information, with the project peak figures at the following locations:**

1. **A59/Pimlico Road junction**
2. **West Bradford Road (north-south) / Ribble crossing haul road junction**
3. **West Bradford Road (east-west) / Ribble crossing haul road junction; and**
4. **West Bradford Road / B6478 Slaidburn Rd junction**

The applicant must clarify whether tipper trucks will be stored on site, with provision shown for the vehicles. The movements as presented, do not appear to consider tipper trucks not being stored on site.

In terms of working hours, paragraph 84 of the TA states that *"the working hours during construction (haulage operational hours, excluding commuter movements) are assumed to be 07:00 to 19:00. It is not possible at this stage to fully predict the detailed arrival and departure for HGVs at each site; however, liaison with United Utilities and professional judgement has been used to develop a profile of arrivals and departures. This reflects the spread of construction activities across the day, and limited capacity of each compound to accommodate multiple activities at once. Traffic has been spread along the working day as follows:*

- *Light and commuter movements: 06:45 to 08:00 and 18:45 to 20:00 (two shifts)*
- *HGVs and abnormal load movements: 09:00 to 14:45 and 16:00 to 18:45. Traffic would be restricted between 08:00 to 09:00 and 14:45 to 16:00 to avoid traffic impact during school drop-off periods."*

I would note that the restrictions for school peak times need further review (e.g. Clitheroe Royal Grammar School finishes at 14:40 on Wednesdays).

(iii) Distribution / Assignment

The distribution of vehicles over the strategic road network is 40% from the north and 80% from the south. While this proportion may not be unreasonable and seems robust, we would require evidence to support these proportions. As described above, all traffic from the SRN is suggested to access the compound via either Haulage Route 1 or Haulage Route 2.

(iv) Committed Development and Emerging Development

Table 16.16 of the TA provides committed development sites that have been identified and applied to the 2024 peak traffic. These are acceptable to LCC Highways.

(v) Junction Operational Assessments

The TA does not include any operation assessments for junctions along the proposed routes. The TA does, however, provide assessments on the impacts of the construction on the links that are proposed to be used for the routing.

Table 16.25 shows the 2024 Background Scenario in the AM Peak (08:00 to 09:00), and Table 16.26 shows the 2024 Background Scenario in the AM Post-peak (09:00 to 10:00). Table 16.27 shows the 2024 Background Scenario in the PM Peak (17:00 to 18:00). Table 16.28 shows the 2024 Background Scenario's two-way link flow over a 12-hour period (07:00 to 19:00).

Tables 16.29 to 16.32 provide the same information for the 2024 background and committed development scenario, and tables 16.33 to 16.36 provide the same information for the 2024 background, committed development and construction scenario.

While the theoretical link capacities shown are interesting, LCC Highways are of the opinion that they do not provide a clear representation of the impacts and are misleading. For example, Link 140 (proposed busiest section of Slaidburn Road) would suggest little or no impact throughout the construction works, which, I consider would not correspond with the impact that local residents may experience.

LCC Highways has always acknowledged that in the main, the focus of the TA was not in regard to network capacity. The impacts are in more in relation to the significant increases in the number and proportion of HGV movements. **However, we consider one location, in particular, does require modelling, i.e. the West Bradford Road / B6478 Slaidburn Road junction (proposed to be signalised).** As set out under Section A 'Access Strategy', further details are required on the proposed layout and the operation of these traffic signals. Clearly, there is potential for significant delays at this location with the introduction of the signals and an expected 3 stage operation with long inter-greens.

B2) Accident Analysis

2015 to 2019 Road Accident and Safety Data from the Department for Transport has been used to conduct accident analysis in the TA. A 200m buffer around the construction traffic routes has been applied as an area of study. Along the buffer, 174 slight and 28 serious and 3 fatal collisions have been identified. There is a cluster of accidents at junctions that require further consideration by the applicant.

While the number of collisions are identified in Table 16.8, the collisions should be reviewed to identify any patterns or concerns (causation factors and user types) that are likely to be

exacerbated by this proposal, when regard is had to the number of movements, especially HGVs.

Note: LCC Highways have previously highlighted concerns with the potential impact of additional HGV movements at the A59 / Pimlico Road junction.

B3) Provision for Equestrian, Pedestrian & Cycling, Public Rights of Way

The following comments on this section are expected to be provided by LCC PRoW team shortly. Clearly, there are a number of locations where PRoW are affected by the HARP proposals and we would expect all issues raised by LCC PRoW to be addressed by the applicant.

B4) Public Transport Accessibility and Provision

There are a number of bus services that will be impacted by the proposals. The CTMP states that *"there is a potential impact on driver delay on identified bus services as a result of the increase in traffic movements along the proposed routes. Bus service movements for each compound are detailed below. C1 provides a summary of the identified services which may be affected along the proposed traffic routes. Following detailed design, the Construction Contractor will liaise with the relevant bus companies prior to start on site. Where bus stops are affected appropriate alternative provision will be included as part of any proposed highways modifications and/or temporary works."*

As well as impacts on bus services as a result of the increase in traffic movements, there will also be impacts on services (school and general) from the proposals such as reduced speed limits and proposed signalised junctions.

Impacts on existing bus stops and any need for temporary relocation must be identified at this stage, with the details agreed with the LHA (not the bus companies). Any impact of the proposal that would result in delay to services / inability to adhere to timetables must be identified at this stage and necessary mitigation agreed.

B5) Travel Plan

Within the TA, the Travel Plan framework is provided under Section 1.7. The Travel Plan states that "it includes key parameters to be taken forward by the Local Highway Authority with the site contractor(s) in the event of planning consent". I would note that the impacts of this project are during the construction phase. Therefore, the requirement for a traditional travel plan that would be suitably managed by the applicant, is limited. It is our view that the CTMP must demonstrate how safe and suitable access can be achieved and managed, and therefore, would expect this to include the management of the workforce and there travel to/from site (compounds / appropriate parking provision / shuttle buses).

(C) Internal Site Layout, Parking Standards/Parking Provision and SUDS

Construction Stage:

LCC Highways understand that the details of the compound layout may be updated once a contractor for the works is procured. However, the applicant must present, at this stage, layouts that show practical and workable solutions.

Newton-in-Bowland Compound:
The proposed compound layout during the construction stage is shown on drawings RVBC-BO-APP-004-05_01 and RVBC-BO-APP-004-05_02, and the proposed compound layout during the connection stage is shown in drawings RVBC-BO-APP-004-06_01 and RVBC-BO-APP-004-06_02.

The compound has been divided into two sections, north and south of Newton Road. The section of the proposed compound north of Newton Road is where the proposed tunnelling and connection activities would take place, and the section of the proposed compound south of Newton Road would provide a temporary crossing over the River Hodder (referred to as 'The Hodder Bridge'), parking, welfare, office, materials laydown and other ancillary development.

It unclear from the drawings presented to the date what provision is proposed for non-non-vehicular movements (of workers) between the proposed parking and welfare area (south of Newton Road) to the tunnel shaft area (north of Newton Road). It would be LCC Highways expectation that such movements will take place and therefore adequate, safe, and suitable provision should form part of the access layout proposals.

On both construction and connection drawings, there are circa 50 parking spaces shown (these appear to be for LGVs). I would question why there is a need for this number of spaces given the approach presented in regard to the park and ride facility and the use of shuttle buses for the workforce. There does not appear to be parking provision for the shuttle bus / buses. As my comment above, there does not appear to be parking provision for tipper truck and we would request clarity on whether tipper trucks are to be stored onsite overnight.

Bonstone Compound:
The proposed compound layout during the construction stage is shown on RVBC-MH-APP-004-05_03 and RVBC-MH-APP-004-05_04, and the proposed compound layout during the connection stage is shown in drawings RVBC-MH-APP-004-06_03 and RVBC-MH-APP-004-06_04.

Although the compound working area appears compact, the site red line boundary is much larger. The drawings indicate that the required plant and materials will be accommodated. (*Note: at no time will any construction traffic be permitted to wait on the public highway but given the distance between the compound and the public highway, I do not expect this to be an issue at this compound.*)

On both construction and connection drawings, there are 23 parking spaces shown (these appear to be for LGVs). I would question why there is a need for this number of spaces given the approach presented in regard to the satellite compound and the use of shuttle buses for the workforce. There does not appear to be parking provision for the shuttle bus / buses.

Braddup Compound:
The proposed compound layout during the construction stage is shown on RVBC-MH-APP-004-05_01 and RVBC-MH-APP-004-05_02, and the proposed compound layout during the connection stage is shown in drawing RVBC-MH-APP-004-06_01.

Although the compound working area appears compact, the site red line boundary is much larger. The drawings indicate that the required plant and materials will be accommodated. (*Note: at no time will any construction traffic be permitted to wait on the public highway but*

given the distance between the compound and the public highway, I do not expect this to be an issue at this compound.)

On both construction and connection drawings, there are circa 50 parking spaces shown (these appear to be for LGVs). I would question why there is a need for this number of spaces given the approach presented in regard to the park and ride facility and the use of shuttle buses for the workforce. There does not appear to be parking provision for the shuttle bus / buses. As my comment above, there does not appear to be parking provision for tipper truck and we would request clarity on whether tipper trucks are to be stored onsite overnight.

Sustainable Urban Drainage Systems (SuDs)

LCC are now the Lead Local Flood Authority (LLFA), as such LCC Flood Risk Assessment Team will provide detailed comments during the planning process under a separate response. In general, LCC will seek to limit the use of culverts where alternative sustainable solutions can be found.

The application should consider the requirements likely to be asked for in support of a SuDs drainage scheme, if deemed necessary. These considerations may significantly affect the site layout/design to include for the likes of swales, storage ponds etc. to control run off rates in accordance with SuDs guidance.

(D) S278 and S38 Works

It is expected that S278 works will be required and controlled by condition if planning approval is granted for this proposal.

Any highway schemes agreed 'in principle' will be subject to detailed design. Given the nature of the proposal, with impacts during the construction stage, is expected that trigger points for all works are to be agreed with LCC Highways and the LPA, in advance of any works commencing onsite.

In addition to the construction of site compound accesses, other works that may be required are:

- Offsite highway improvements (improvement to pedestrian/cycle provision);
- Any traffic management measures, and associated Traffic Regulation Orders as deemed necessary; and
- Public Transport infrastructure relocation.

This list is not exhaustive and is clearly subject to ongoing agreements in regard to necessary mitigation and the developing CTMP.

(E) Planning Obligations (s106 Planning Contributions)

It will be expected that the applicant will confirm commitment to appropriate s106 funding requests. These may include:

- Heads of Terms (addressing route condition / monitoring and necessary maintenance and remediation

(*Note: HoT referenced above to be agreed and referenced within the s106, however, it is likely that this may form part of a separate legal agreement between the applicant (and their representatives) and the local highway authority only);*
- Funding for a full LCC post for the duration of the project to address the requirement of ongoing collaborative work, required to ensure the best management of the CTMP (see further comment below under separate heading);
- Funding to support various 'legacy' improvements;
- Pedestrian / cycle / PRoW improvements;
- Public Transport service improvements; and
- Travel Plan Support contribution etc.

This list is not exhaustive and is clearly subject to ongoing agreements in regard to necessary mitigation and will be expected to be agreed with the LPA and LCC Highways.

(F) Construction Traffic Management Plan

A draft CTMP has been provided as part of the application. It is LCC Highways' view that an acceptable and agreed CTMP **must be developed prior to any approval**. While it is acknowledged that certain details can only be firmed up once a contractor has been appointed by the applicant, LCC Highways must be satisfied that the content and the principles of the CTMP demonstrate that safe and suitable access can be achieved. It should also be demonstrated that the impacts of the proposal that have been assessed can be managed with appropriate mitigation as necessary and controlled by condition.
(*Note: we understand the applicant has had some early contractor advice on some matters)*

Given the comments above, and with consideration for the full proposals in the Ribble Valley section of the HARP project, it is clear there is still numerous matters to be resolved, in particular, demonstration of the acceptability of the proposed routing and access strategy. Therefore, at this stage, is it our view that further development of the CTMP will be necessary to allow us to conclude matters.

(G) Road Condition Monitoring and Maintenance Strategy (HoTs)

LCC Highways have been provided with a draft Heads of Terms (HoTs) to address road condition monitoring, surveys and ongoing maintenance and remediation, to be funded by the applicant (recovery of expenses due to extraordinary movements and damage to highway). It is essential that agreement is reached on how the access routes will be maintained, allowing unrestricted access, not only for construction traffic but also all other highway users. This document is currently being reviewed by LCCs Legal team and number of changes will be required before agreement is reached. LCC Highways will not be able to provide support for the HARP proposal until this draft legal document has been agreed and signed.

Note: recent experience on a much smaller United Utilities project has highlighted the ramifications for project delivery and the consequences on the highway network of the impact of substantial increases of HGV movements, particularly on historic rural narrow highway that is not constructed to modern standards and therefore able to accommodate the additional impact/loading created as a result of the construction project. This impact will necessitate continual temporary maintenance which will impact on corridor/availability/reliability. This has implications for all road users not just the construction traffic and routing. This impact also

needs to be considered in the assessment. In addition to ongoing necessary maintenance, more significant maintenance schemes will be required, having further impacts as highlighted above. Again, these schemes to be funded by the applicant. It is acknowledged that the above comments have greater relevance on more rural working compounds.

(H) Funding for a full LCC post for the duration of the project

This proposal presents unique challenges, not only to the applicant, but to the LHA in managing and maintaining appropriate safe and suitable access for construction traffic during the extended (up to 7 years) construction programme. It is considered necessary that funding is secured to support a full LCC post for the duration of the over HARP project. This post will address the requirement for ongoing collaborative work, required to ensure the best management and successful delivery of the CTMP across the 5 applications from Lancaster in the north to Rossendale in the south of the County.

Conclusion

These statutory comments provide an interim response with consideration for all relevant information uploaded on the Ribble Valley Planning Portal in July 2021. These include a Transport Assessment, a draft Construction Traffic Management Plan and other relevant plans and documentation. Currently, there are a number of outstanding matters and information required from the applicant in order for the Local Highway Authority (LHA) to fully understand the impacts of this proposal and provide final comments. It is acknowledged that the applicant is preparing to submit further information (Supplementary Environmental Information). LCC Highways would expect that this information seeks to address all matters highlighted above.

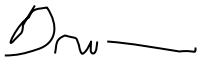
When the necessary further information is presented, I expect to be able to conclude matters in an updated response. However, LCC Highways position at this time is to recommend that the Local Planning Authority (LPA) does not take this application to committee for a decision until all outstanding information is presented and considered by the LHA. If the application was to be taken to planning committee at this stage, it would not have LCC Highways support.

Planning Conditions (Highways)

When all matters above are addressed to the satisfaction of LCC Highways, I will be happy to provide a list of suggested conditions that may be appropriate should the LPA be minded to grant approval.

I hope the above is of assistance.

Yours Faithfully,



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