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Your ref 3/2021/0660-0661
Our ref 3/2021/0660-0661/NJS2
Date 17th February 2023

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, STORAGE 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.**

Summary

These statutory comments have regard to all relevant information uploaded on the Ribble Valley Planning Portal and provided to LCC Highways via email, to date. These include a Transport Assessment, Construction Traffic Management Plan and other relevant plans and documentation.

With consideration for all the information now provided, I consider that the impacts of the proposals on the Local Highway Network, could be made acceptable. However, this is subject to a number of matters being suitably addressed and secured by condition including; agreed highway changes, HGV caps and restrictions, a legal agreement in place to overcome highway deterioration and maintenance issues, PRoW management, maintenance and diversions (as provided in separate correspondence by LCC PRoW Team), and the provision of a resource to enable the highway authority to work closely with the applicant during the full period of the project.

It is important that the necessary controls are in place and that measures will be delivered to limit traffic impacts as well as nuisance and vibration to those properties that are impacted upon. Whilst some issues arising relate to and may be resolved by changes to the highway, they may require other authorities involvement (Lancashire Constabulary, the LPA). Strong communication and cooperation between all will be required in order to ensure that highway operation is safe and convenient, and the adverse impacts of the development are addressed in a timely manner by the applicant on an ongoing basis.

Phil Durnell
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Background

HARP is deemed necessary by United Utilities to enhance the resilience of the existing Haweswater Aqueduct, an essential part of water supply network in the Northwest 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.

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

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. 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, to date, including the latest Supplementary Environmental Information (SEI) and Construction Traffic Management Plan (CTMP).

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 (this date is based upon the documentation), and a permanent valve house structure with associated ancillary infrastructure is proposed to remain at the site following completion of the works.

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 (this date is based upon the documentation), and a permanent valve house structure with associated ancillary infrastructure is proposed to remain at the site following completion of the works.

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 (this date is based upon the documentation), and a permanent valve house structure with associated ancillary infrastructure is proposed to remain at the site following completion of the works.

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. Construction Traffic Management Plan
E. Highway Works to be Delivered
F. Planning Obligations (s106 Planning Contributions)
G. Road Condition Monitoring and Maintenance Strategy
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 each compound during the construction stage will be from a singular dedicated access off the B6478. Construction vehicles are proposed to route to and from the compounds from the A59. Within the SEI and subsequent information provided in March 2022, the proposed routing strategies have been updated by United Utilities (UU) and their consultants.

1. Haulage Route 1 (use of existing public highway) is proposed for the initial 9 months of the project to establish the proposed crossings over the River Ribble and River Hodder only. These are pre-commencement works. This will be protected by a suitably worded condition.
2. Haulage Route 2 (proposed crossing over the River Ribble) is then proposed as the main route for all construction vehicles, with Route 1 not being used by HARP vehicles (main construction route expected from 2023 – 2030). This will be protected by a suitably worded condition.

1. Haulage Route 1 (Temporary Construction Route for initial 9 months)

The initial 9 months are proposed to facilitate the construction of the proposed Ribble Crossing and proposed Hodder Crossing. I would note that Appendix B8(i) of SEI indicates only 4

months is required for the construction of the crossings. This has been raised with the applicant who has suggested that 9 months is the realistic timescale for the construction of the bridges taking into account unforeseen circumstances.

The proposal for Route 1 can be divided in to 5 sections.

Route 1A: (for vehicles under 3.5m high) to access the northern end of the proposed Ribble Crossing

Route 1B: (for vehicles over 3.5m high) to access the northern end of the proposed Ribble Crossing

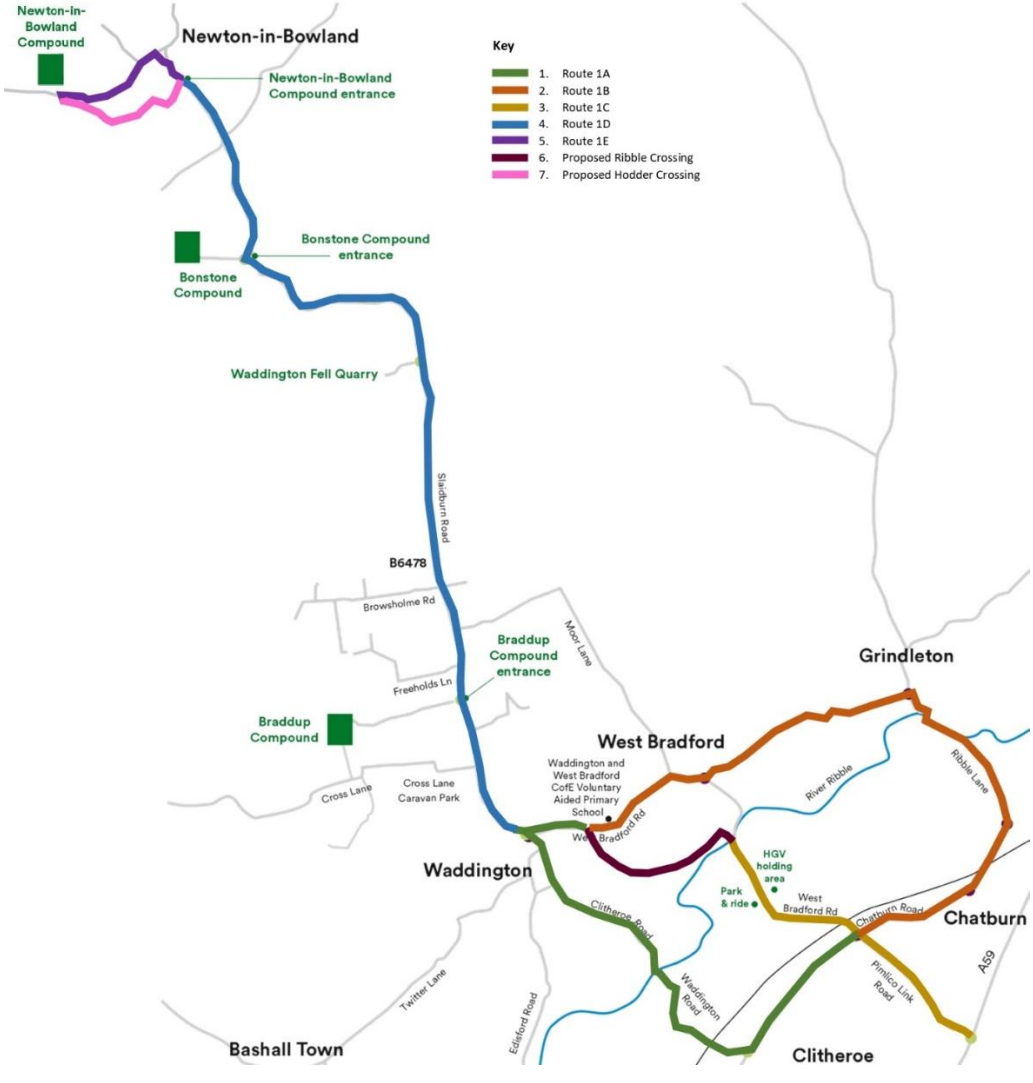
Route 1C: to access the southern end of the proposed Ribble Crossing.

Route 1D: extension to Routes 1A and 1B to access the B6478 for the eastern side of the proposed Hodder Crossing.

Route 1E: is proposed to access the western side of the proposed Hodder Crossing.

Note: the CTMP will need to identify how the risk of vehicles not using the current route and how this will be managed (i.e., tractors being interchangeable with trailers).

The routes are highlighted in the diagram below.



General Requirements

LCC have been discussing the access and routing proposals for the Ribble Valley compounds with the applicant for over 3 years. During this time, officers have been very clear that although the routes proposed are suitable for the current uses that they facilitate, the increased use of these routes for construction traffic over an extended construction period presents considerable challenges and therefore the LHA have significant concerns.

These would be in terms of:

- operation of the proposed routing strategies (including the consequences of conflict, limiting carriageway width, limited forward visibility etc.),
- the safety of all users,
- the capability/suitability 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 a risk of prolonged periods of road closure) and
- residual issues arising from and following construction.

Notwithstanding these issues that are not fully yet resolved to the LHA's satisfaction, in addition the following general measures/strategies/initiatives/considerations etc., will also be required, along all routes proposed (initial stage and main project stage):

- Parking review will need to be undertaken at the beginning of the project, with a review every 3 month (in particular, through Clitheroe, Waddington, West Bradford and Chatburn).
- A number of villages that HGVs will be travelling through, where constraints exist (limited road width, limited/no footway, limited visibility etc.), speed limits will need to be reduced to 20mph, funded through this application, with supporting gateway treatment. Otherwise, may influence driver behaviour of other vehicles travelling at higher speeds in either direction resulting in conflict/collisions.
- Prior to the project commencing, and during the period of the project, any locations of the carriageway or verge that shows signs of wear and tear or damage should be repaired (including all highway assets, 3rd party assets and consequential costs) with the cost being borne by the applicant as a preventative approach to limit early project delay (as a consequence of additional use).
- The applicant is required to have regard for, and make suitable adjustments to their operation satisfying (this to be kept live and reviewed throughout the project):
    - school drop off and pick up times
    - bus timetables
    - railway timetable (West Bradford Road Crossing)
    - refuse collection times and routing
    - utility works (planned and emergency)
    - landowners adjoining the highway (maintenance and development works)

  in order to minimise/manage conflict on the highway.
- Clear information boards that highlight the duration, progress, remaining works and anticipated vehicles. These are to be located through all villages and communities that will be passed by construction vehicles. Exact locations to be conditioned.
- In many locations, existing verge and foliage has reduced the available carriageway width and visibility spays and visibility of infrastructure. LCCs current maintenance strategy is adequate for the current use of the routes. The proposed project and the frequency and sizes of HGVs expected, there is a clear need for additional cutting back and frequent maintaining of verges and foliage. Prior to the project commencing, all verges and foliage must be cut back, as a minimum to the edge of the highway and where possible to the edge of the adoption. Cutting back should not be to the extent

that it undermines foliage beyond the highway boundary, batters, embankments and tree roots. The requirement to provide vegetation and verge maintenance through the full route needs to have regard to nesting season, with an assessment every 3 months and where necessary, cutting back is also undertaken.

- To maintain lane discipline, there is a need to renew all road marking / traffic calming schemes, along all routes used by HARP vehicles.
- While an area wide TRO is in place protecting the area and the structures within, structural surveys are to be undertaken on all structures on a regular basis, with additional evidence collected (photographic) and identification of any works required in line with loading capacities (and delivered in a timely manner). Frequency of survey and consequences to be agreed. The cost of any additional assessments and necessary works, over and above that which would be picked up by LCC as maintenance, to be funded by the applicant. All maintenance works to be carried out and completed as soon as the Local Highway Authority require.
- It is not clear whether the convoying of HGVs will be proposed. If so, all structures need to be assessed with consideration of multiple and cyclic loading from all vehicles in a convoy.
- In locations where widenings/passing places are provided, resurfacing beyond these limits may be required. Again, to be funded by the applicant.

All of the above is supported by the applicant (UU) and to be controlled by a suitably worded planning condition and be delivered, where appropriate, by a s278 agreement. **The s278 agreement must be signed prior to any progress on this project, including pre-commencement works.**

Route 1A (through Clitheroe and Waddington):

Swept Path Analysis (SPA) was included in the initial CTMP, but as the main construction works no longer proposed to use this route, it has now been removed. However, there is still a requirement for construction vehicles to use this route, for the initial 9 months, and therefore my comments take into consideration the SPA that was previously provided.

- The A59 / Pimlico Link Road junction road markings to be renewed and cutting back undertaken maximising visibility (as highlighted above). LCC Highways have previously highlighted concerns with the potential impact of additional HGV movements at this junction. A road marking and signing review is required at this location, with the delivery of any necessary works, as a consequence of the significant increase in HGVs using this junction.
- Slight widening at the A671/B6478 (Clitheroe Centre) roundabout. Extents of the works to be determined at the detailed design stage.
- A proposed temporary vehicle holding area is presented south of Waddington, on the B6478 (drawing 80061155-01-UU-TR4-XX-DR-C-00040 Rev P01.1). The location of this proposal as presented is unlikely to satisfy its purpose, especially for vehicles travelling from the north. An alternative location to be agreed and linked to a planning condition. The area is proposed as more of a waiting area, if required on rare occasions of high construction vehicle flows, to hold vehicles so the village can be cleared of construction vehicles. Notwithstanding this, I also require limiting the number of HGVs as set out in my comments below.
- The CTMP proposes a 15mph speed limit for construction vehicles through Waddington, that will give way to non-motorised users. This is supported under the premise that, as highlighted above, Waddington is made a 20mph village, funded through this application, with supporting gateway treatment. Otherwise, may influence

driver behaviour of other vehicles travelling at higher speeds in either direction resulting in conflict/collisions.

There will also be a need for HGVs to travel from the B6478 North of Waddington to the Haul Road access off West Bradford Road. This will require the implementation of the traffic scheme on West Braford Road prior to construction works for the Ribble Crossing. As well as the initial 9 months of the project, this scheme will be implemented for the full (expected) 7 years of the project. The applicant proposes the scheme shown in Drawing B27070CQ-JAC-XX-DR-C-TR4_WV-1112 Rev P02. This drawing shows the full scheme, from the proposed haul road access on West Bradford Road to beyond the junction with Slaidburn Road (B6478), and latest comments are provided below following the same order:

- From the haul road until the location the residential dwellings begin, the SPA suggests that the vehicles will be accommodated in two-directions without conflict.
- From around the fourth dwelling (Berner) to the sixth (Greenways), the SPA indicates that vehicle tracking is extremely tight as a consequence of the carriageway slightly narrowing. There is no factor of safety at these locations. Therefore, minor widening will be required in this location (this widening is not highlighted on drawings and needs to be protected by a suitably worded planning condition).
- In the location of 67 West Bradford Road, the applicant proposes to widen the carriageway by removing the existing grass verge, in order to accommodate two-way HGV working while maintaining the existing on road parking. This will require the use of a retaining structure. The existing infrastructure within the verge will need to be located and this is shown on the plan. All infrastructure will require adequate cover from the carriageway and the applicant has indicated that this is deliverable.
  At this location, cross-sections of the existing verge (80061155-01-UU-TR4-97-DR-C-200017) and the proposed widening (80061155-01-UU-TR4-97-DR-C-200018) have been provided. The applicant confirmed via email (dated 10/02/23) that the dimensions are based on OS mapping that has been checked with measurements taken on site.
- On the drawing, signs appear to be in direct conflict with swept paths, the applicant has confirmed that the signs are not shown to scale and that the appropriate cover can be achieved. All of the signing strategy is subject to further detail, including the orientation of passing place signs, which as shown, will have limited impact as presented and are currently shown on land beyond the public highway.
- From the end of the proposed verge widening to the entrance of the Waddington Hospital Cottages, the section of highway will only be able to accommodate 1-way HGV working. Visibility is shown on drawing B27070CQ-JAC-XX-DR-C-TR4_WV-1111 Rev P02. To improve visibility beyond the Hospital Cottages, a new alternative bus shelter, that is open on the front should be provided.
- Moving closer to the junction the drawing identifies areas of conflict. The proposed artificial raised table scheme at the junction is suggested to reduce vehicle speeds at the junction. While the raised table scheme is accepted in principle, details are yet to be agreed. This includes the gradients of cushions, gulley locations, provision of cobble drainage where appropriate, and length of the cushion.
- Beyond the junction, to the north, the existing slight line uses 3rd party land. The applicant does not propose to make any improvement at this location. Currently, there are no recorded incidents at this location. This section of the corridor to be monitored and if required a signing and lining scheme to be delivered that manages movement of two-way HGVs. HGVs currently have visibility over this 3rd party land.
- While gateway measures in the form of Dragon teeth have been shown at locations of existing gateway signs (drawing B27070CQ-JAC-XX-DR-C-TR4_WV-1110 Rev P02), to reduce the speed limit to 20mph, there is also the need for dragon teeth markings in advance of and beyond locations where the swept paths show HGVs in two-directions

that conflict with each other (in these sections it will be managed one-way working). In addition, at these locations, signage advising users of the narrow road will be required. There may also be the need for the use of colour material/aggregate at these locations.

While the principles of this scheme are acceptable, the detailed design will need to be protected by a suitably worded planning condition.

In addition, the condition of the carriageway, manhole covers and gullies to be reviewed on a monthly basis (or when informed by the community) and any undulations, cracking, or resetting of covers / gullies to be made good within 1 working week of the review. This is necessary to reduce/limit vibration and nuisance that these vehicles will cause. **This approach to apply in all locations where the carriageway is near to dwellings (irrespective of route).**

The strategy to be taken forward on this part of the highway considers the full corridor defining appropriate safe waiting areas prior to road narrowing enabling oncoming vehicles to pass safely, supported by signing and lining. The second phase of the strategy, if necessary, is the delivery of a regulated approach, by this applicant that will include 'give way' signs possibly with the use of enforcement through CCTV (all funded by the applicant). A pragmatic approach has been adopted in this location, having regard to safety and driver adherence to the strategy.

Route 1B (through Chatburn):

SPA was included in the initial CTMP, but as the main construction works no longer proposed to use this route, it has now been removed. However, there is still a requirement for construction vehicles to use this route, for the initial 9 months, and therefore my comments take into consideration the SPA that was previously provided.

- There is still a requirement for the previously proposed road widening RW01 (although the extents of the widening may be less at detailed design stage). In this location there is a cluster of collisions. The proposed scheme must maximise sight lines within the highway boundary and maintain lane discipline for swept paths in line with DMRB standards. Provision for pedestrian and cyclists to be enhanced where possible. This scheme is required as a consequence of the significant increase of HGV movements and the additional risk to collision increases.
- There may be no need for RW02 with the cutting back of the verge as stated above.
- As highlighted in General Requirements above, a strong signing strategy will be required at all pinch points (including the East View bridge, the East View / Grindleton Road junction, St Catherine's Church and the 3 Millstones Inn etc.), that includes slow signs and that highlights that the narrow roads will be used by HGVs.
- There may be no need for RW06 with the cutting back of the verge as stated above. However, areas of overrun will be monitored and if required, the carriageway widened under S278 agreement, as I highlight further below.

Route 1C (adjacent to Hanson Cement):

This section of the route already serves HGVs frequently, up to Hanson Cement. There is a bus stop at the location of the proposed Ribble Crossing access on West Bradford Road, that will be suspended during the project, and reinstated with new infrastructure upon completion of the HARP project.

Bradford Bridge will need a full structural survey and inspection in advance of any works to ensure that it can satisfy the demand from the HARP project for the initial planned 9 months. This survey will indicate any works required and will be protected by a suitably worded planning condition. A survey will also be required after the pre-commencement works, and any maintenance works to be undertaken within an agreed timeframe. Any delays may require additional surveys.

Note: the bridge was last assessed in 2021 and at that time could accommodate 40 tonne loading.

Route 1D (Slaidburn Road):

Along this section of route there are 22 road widenings proposed. After reviewing the location of the proposed widenings, a number of which are clearly required and others that appear to provide limited/no benefit.

- Those that should be constructed prior to the project are: RW12, RW15, RW16, RW23, RW24, RW26 and RW28. Once verge and foliage has been cut back, as suggested above, and the edge of the carriageway has been identified, some widenings as proposed may not be required, and others may be required (as a consequence of the SPA's background mapping being inaccurate).
- Proposed widenings, where possible, should not be on the same side as existing ditches, e.g., RW19 should be moved to the opposite side of the carriageway.

  Note: to overcome safety issues, additional works will be required where widenings are proposed on the same side as ditches.
- All widenings are subject to detailed design having regard to infrastructure, carriageway alignment, topography, speeds and safety, e.g., RW28 may require lengthening and signage currently exists at RW26.
- I do not fully agree with the locations of some of the proposed widenings, e.g.,
  - a pinch point appears north of RW09 rather than where it is proposed
  - RW22 would be more beneficial if was provided at the apex of the bend, and
  - there may be a need for widening north of the Braddup compound access.
- From the information provided, including low resolution swept path analysis, all required road widening locations cannot be fully determined at this stage (as highlighted above). Having regard to this, and more importantly the actual operation of the corridor, the applicant will be required to monitor the full route for areas of overrun or conflict (i.e., apexes of bend etc.), during the project, and where required, provided further widening of the carriageway.
- With the formalisation of passing place PP01, and greater use of the passing place area, the area will require resurfacing. PP02 will require revising to ensure HGV can enter, wait and exit safely.
- The structural integrity of all cattle grids along the route will need to be examined together with the structural survey, to ensure they will be able to take constant loading of HGVs for the full project. The condition survey must present a clear understanding of the sub-structure and ensure that it is suitable and can sustain the levels of use proposed by the project. Again, these surveys to be undertaken on a regular basis. It is likely that maintenance, strengthening (structure and foundation) and preventative works will be required at cattle grids.

  Note: It is likely that in some locations, proposed road widenings exceed the highway boundary. The applicant must secure land to deliver widenings. Widenings are also

likely to require reduction in widths of existing hedgerow. If hedgerow is significantly damaged as a result of heavy cutting back, it will need to be replaced at the cost of the applicant, including any other associated costs.

Route 1E (through Newton-in-Bowland):

To access the western end of the proposed Hodder Crossing, the CTMP states that it is 'anticipated that there will be a need for some Light Vehicle and HGV movements through Newton-in-Bowland village'. The applicant has indicated that currently, HGVs pass through the village on a regular occurrence to access the UU Fober Barn, and therefore no engineering mitigation is presented through the village

The applicant has provided SPA of 21m, 18.5m, and 8.8m vehicles through Newton-in-Bowland. The SPA shows the vehicle using the full highway i.e., including full verge, and does not consider road markings and parked cars. For a predominant length of road through the village, circa 450m, an HGV manoeuvring will prevent a vehicle traveling in the opposite direction. As HGVs currently pass through the village, this issue is currently present. Any increase in HGVs is a concern. The applicant suggests two convoys (1 in, 1 out) of 2 HGVs per day, for 4 days per week and its management to be agreed with the community.

Whilst this approach is noted, it does not overcome my concerns when regard is had to parked cars, limited/no footway and proximity of buildings to carriageway. With these constraints, I would strongly suggest that a maximum of two convoys (1 in, 1 out) of 2 HGVs per day for 2 days per week, to any UU related work (whether HARP, UU Forber Barn etc.). No movements to occur during school holidays. Restrictions to be reviewed after 3 months. Vehicle speeds must not exceed 10mph with HGVs escorted in and out. A scheme is required that includes local safe waiting areas, that are sign posted. In addition, the condition of the carriageway, manhole covers and gullies to be reviewed on a monthly basis (or when informed by the community) and any undulations, cracking, or resetting of covers / gullies to be made good within 1 working week of the review. This is necessary to reduce/limit vibration and nuisance that these vehicles will cause. This approach to apply in all locations where the carriageway is in close proximity to dwellings.

All of the above to be protected by a suitably worded planning condition.

Note: Noise and vibration is a matter for the Local Planning Authority and the LPA's support on this is requested. If the LPA is contacted regarding noise and vibration stemming from development related highway issues, please inform the Local Highway Authority. It is crucial all authorities communicate in a timely manner on these issues and share information, so the applicant can address any issues in a reasonable time frame.

The Local Highway Authority has recommended specific measures to the applicant for issues to be addressed and harm to be minimised. As enforcement of speed limits is a matter for Lancashire Constabulary, for example, the cooperation of all authorities is required. The routes being adapted will not completely remove the possibility of adverse consequences, and the applicant (and their contractors) will need to remedy issues in a timely manner. The Local Highway Authority cannot take responsibility from harm arising from these movements, particularly where there are matters of vibration and enforcement issues outside of the reasonable control of the LHA. The LHA is not responsible for harm arising from development, the policy test the LHA is required to consider is severity, which is satisfied subject to my outstanding concerns being addressed by the applicant.

2. Main Construction Route from 2023 – 2030

The main construction vehicle route (Route 2) that is anticipated from 2023 to 2030 utilises sections of the above routing strategy to access the compounds (i.e., Route 1C, the Ribble Crossing, Route 1D and the Hodder Crossing). My comments above therefore cover the routing for both the initial works and the main project works. With regards to the proposed Ribble and Hodder crossings, I require that the proposed roads and bridges to be considered suitable (evidence based) to serve the construction traffic throughout the whole project, including all weather conditions. This route will, at no point of the project, become adopted highway. The proposed Ribble and Hodder crossings and haul roads will only be for the use of HARP vehicle, with no public access. The mainline will retain priority with the haul roads being secondary, with give-way road markings at their junctions.

> *Note: the haul road crosses a number of watercourses which are susceptible to localised flooding, the design and it's maintenance needs to have this in regard.*

The CTMP proposes that along the B6478 the speed limit will be an advisory 30mph limit, with mandatory 30mph speed limits in the vicinity of the accesses. For consistency, the speed limit at the vicinity of the Newton-in-Bowland Compound staggered access should also be 30mph, rather than the 40mph currently proposed. I would also advise that the advisory limit is increased to 40mph to increase the likelihood of adherence. There is also a need for a section of 30mph speed limit in the vicinity of the Waddington Fell Quarry access, that is not currently shown.

> *Note: 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 does not form part of the planning process. Following successful implementation of a TRO, enforcement of these is a matter for Lancashire Constabulary.*

For enforcement, the CTMP suggests the use of the Speed Indicator Devices and additional police enforcement (e.g., mobile cameras). This is subject to further detail (locations etc.) and Lancashire Constabulary's support. The applicant is yet to provide evidence of Lancashire Constabulary's support, and as such if the applicants' proposals are not supported by them, further mitigation will be required along the route, yet to be defined, considered and supported. It is suggested the LPA require evidence of Lancashire Constabulary support as part of that required for consideration of the application and inform the LHA if this cannot be provided so that further work can take place.

The applicant proposes the use of the Hansons Cement HGV marshalling areas to be used for construction delivery vehicles as holding area during movement restriction periods and marshalling area when convoys are used. The applicant also proposes that the existing Hansons Cement overflow car parks are to be used as park and ride facility for HARP construction personnel. The HGV Holding area and Park and Ride area is shown on drawing 80061155-01-UU-TR3-XX-DR-C-00045 Rev P01.1. This is acceptable to LCC Highways, subject to detailed design. The use of the Hansons Cement areas will need to be controlled by a suitably worded planning condition.

Compound and Haul Road Accesses:

Ribble Crossing

For the proposed junctions off West Bradford Road, the proposed access arrangements are shown in drawing B27070CQ-JAC-XX-DR-C-TR4_VS-1010 Rev P01.2 and B27070CQ-JAC-XX-DR-C-TR4_VS-1011 Rev P01.1. This is agreed in principle, subject to detailed design including safety audit. These drawings include the dimensions of the proposed access and the visibility splays that should be protected by a suitably worded condition, for the duration of the construction works. Swept Path Analysis of the TBM is shown in drawings B27070CQ-JAC-XX-DR-C-TR4_VT-1129 Rev P01.2 and B27070CQ-JAC-XX-DR-C-TR4_VT-1131 Rev P01.1.

Hodder Crossing

For the proposed junction off Hallgate Hill B6478, the proposed access arrangements are shown in drawing RVBC-BO-APP-004-11_02. This is agreed in principle, subject to detailed design including safety audit, and there may be a need to increase the taper on the B6478 to aid with speed reduction. 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.

Newton-in-Bowland Compound

A staggered junction is proposed on Newton Road opposite the access for Fober Barn, 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. This is agreed in principle, subject to detailed design including safety audit, and the taper towards the village of Newton-in-Bowland is not required as does not form any routing strategy. 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.

Bonstone Compound

The proposed vehicular access strategy to serve the compound during the construction stage will be from an existing access off the B6478 on the western side, in the area shown as Blue Gates on the Ordinance Survey maps, 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.

Braddup Compound

The proposed vehicular access strategy to serve the compound during the construction stage will be from a new access off the B6478 on the western side, north of Bookers Farm,

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.

General Compound and Haul Road Access Comments

All accesses for haul roads and compounds are subject to detailed design including safety audits. This includes swept path analysis of frequent HGVs simultaneously using the accesses. It also includes proposals for gates at accesses and the detailed design must identify how vehicles will be accommodated to allow stacking if necessary and to ensure that large vehicles turning off the roads will have unobstructed access. This to be protected by condition.

There is a requirement for wheel washing and road sweeping at all compound and haul road access locations. In addition, the applicant will need to address additional requirements with regard to winter maintenance (gritting, snow clearance etc.) that will be necessary to maintain safe access, at all times, for the project. This to be protected by condition.

> *Note: The offsite highway 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.*

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 needs 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) to be considered and satisfied. The applicant proposes a condition for a detailed Lighting Management Plan, which is not unreasonable.

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 are to 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, as a minimum, to their original condition. A timetable for reinstatement to be linked to a suitably worded planning condition.**

Road Safety Audit (including operational audit)

A Stage 1 RSA audit that covers the compound accesses and road widenings / passing places and an Operational Risk Assessment (ORA) that covers risks along the routes have been

provided to LCC Highways. However, **LCC Highways are awaiting an updated ORA**, and as suggested by the interim ORA update provided by the applicant, any proposed physical measures must not compromise/hinder pedestrian and cycle movements (in terms of accessibility and visibility). A Stage 1 RSA for the West Bradford Road scheme has now also been provided to LCC Highways. The problems and risks highlighted have been covered by my comments above, including suggestions for solutions. Notwithstanding this, the outcomes of the above need to be fully incorporated into the CTMP, and as part of detailed design, further safety audits will be required to be satisfied.

Waddington Fell Quarry Site Access Improvement and Traffic Figures

The LPA (Lancashire County Council) has considered and approved the Waddington Fell Quarry (WFQ) application for the disposal of tunnel arisings at WFQ. Within the decision notice, the LPA has conditioned a site access improvement scheme (which also negates debris on the public highway from the site) and restricts the number of HGVs entering or leaving the quarry in any working day.

(B) Comments on Other Elements Within the Overall Transport Assessment

The following section provides LCC Highways comments on other key elements that have been or should have been 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. 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 may not be unreasonable, however, is likely to underestimate the 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 an early contractor involvement) that contained expected movements based on construction activities, materials and waste. For each of the compounds, the type, size and number of vehicles pertaining to tasks from programme of works have been distributed in weekly movements. The movements have been further divided into Heavy Goods Vehicles (HGV) and Light Goods Vehicle (LGV) classes.

I am aware that these spreadsheets (as highlighted above) were not submitted as part of the planning application. The latest version of the spreadsheets provided to LCC Highways as part of the pre-application discussion were revision "TVM - v6 - 30Jun20". The applicant has confirmed that this version is the most up to date.

Considering the information presented, it is clear that the levels of impacts vary through the period of works and location on the highway network. The HGV movement caps presented below are lower than the HGV demand as per UU's submitted documents. The LCC caps have been derived on our review of existing traffic flows, HGV proportions, network and operational constraints and highway safety. The aim of the caps presented below, together with other measures/strategies secured, are to provide a practical/workable approach to the applicant, while better controlling the level of impact. Regard has also been had to the routes, locations of existing communities/amenity provision and building line. A balanced approach has been considered having regard to network operation, the HARP project and measures/strategies that positively influence highway safety.

The LCC caps to be initially applied to the HGVs (for all purposes), and if required will also be applied to LGVs, and the caps (average and maximum) should be protected by suitably

worded planning conditions. While caps will be monitored as part of the CTMP, it is may be the case that cap will change having regard to lesser or greater impacts than anticipated. Caps to be reviewed by the Highway Authority, working closely with the applicant and their contractor, on a weekly basis using the previous weeks data (having regard to complaints and issues received) and any changes to be delivered within 5 working days of their review, and this to be protected by a suitably worded planning condition.

In addition to the HGV caps below, time restrictions are presented for the specific routes. For all routes, the following restrictions must be considered and protected by suitably worded planning conditions:

- Unspecified time restriction dependant on Church services or other community events. Church/event organisers to provide a minimum of 1 week notice and each restriction to be agreed and time limited. Unless traffic management is in place on route of HGVs. These restrictions only apply to HARP. Other processes will need to be followed for non-HARP related restrictions.
- Reviews will be needed, if there is a future demand in school movements using the bus stops that considers pick up, drop off and walk times to bus stops.

  Note; the values stated below are based on a 5-day working week, not 5.5-days, which provides the applicant a level of flexibility.

Route 1A (for the initial 9 months period only. Dates to be agreed in advance with LHA)

The applicant proposes 07:00 to 19:00 working hours. HGV movements into the site will need to be restricted during the following hours (term time only):

- 08:00 to 09:00 (Monday to Friday)
- 14:00 to 15:00 (Wednesday)
- 15:15 to 16:15 (Monday to Friday, excluding Wednesday)

These restrictions are necessary to safely manage movements having regard to the local schools in the vicinity. These restrictions must be protected by a suitably worded planning condition. The HGV movement caps below take in to account the working hour restrictions.

> *Note: it is suggested that these restrictions are monitored. As the project programme spans many years it is important that the planning condition is flexible enough to increase/reduce restricted hours based on monitored evidence.*

No parking on the surrounding network, while restrictions are in place. This to be controlled by a suitably worded planning condition.

Permitted HGV Movements

a) The **average** number of HARP HGVs using this corridor, over the duration of the works, shall be no more than 30 in each direction in any one working day (total 60 two-way movements); and
b) Notwithstanding (a) above, a **maximum** of 45 HARP HGVs can use this part of the network in each direction in any one working day (total 90 two-way movements).

   If, due to exceptional circumstances, there is a need to exceed the maximum value in (b) above, this should only be done following **advanced** written agreement with the LPA in consultation with the LHA. The are no exceptions to this and the CTMP must highlight a course of action to ensure that the above is adhered to.

The CTMP to be kept up to date and shared with the LHA when changes are made, to ensure that the **average** is achieved.

Route 1B (for the initial 9 months period only. Dates to be agreed in advance with LHA)

The applicant proposes 07:00 to 19:00 working hours. HGV movements into the site will need to be restricted during the following hours (term time only):
- 08:15 to 09:15 (Monday to Friday)
- 15:00 to 16:00 (Monday to Friday)

Permitted HGV Movements

a) The **average** number of HGVs using this corridor, over the duration of the works, shall be no more than 2 in each direction in any one working day (total 4 two-way movements); and
b) Notwithstanding (a) above, a **maximum** of 7 HGVs may use this part of the network in each direction in any one working day (total 14 two-way movements);
c) The **maximum** number of HGVs using this corridor, in any working day, shall be no more than 1 in each direction in any **one working hour** (total 2 two-way movements).

If, due to exceptional circumstances, there is a need to exceed the maximum value in (b) above, this should only be done following **advanced** written agreement with the LPA in consultation with the LHA. The are no exceptions to this and the CTMP must highlight a course of action to ensure that the above is adhered to.

The CTMP to be kept up to date and shared with the LHA when changes are made, to ensure that the **average** is achieved.

Route 1E (for the initial 9 months period only. Dates to be agreed in advance with LHA)

The applicant proposes 07:00 to 19:00 working hours. HGV movements into the site will need to be restricted during the following hours:
08:00 to 09:00 (Monday to Friday)
14:00 to 15:00 (Wednesday)
15:15 to 16:15 (Monday to Friday, excluding Wednesday)

In addition, no movements to take place during school holiday or on weekends.

Permitted HGV Movements

a) The **maximum** number of HGVs using this corridor, over the duration of the works, shall be no more than 2 in each direction in any one working day (total 4 two-way movements); and
b) The HGV vehicles movements to use this corridor for no more than 2 days in any week (between Monday and Friday).

If, due to exceptional circumstances, there is a need to exceed the maximum value in (a) above, this should only be done following **advanced** written agreement with the LPA in consultation with the LHA. The are no exceptions to this and the CTMP must highlight a course of action to ensure that the above is adhered to.

West Bradford Road (between proposed Haul Road access and B6478 Slaidburn Road) (for period of full project)

HGV movements into the site will need to be restricted during the following hours (term time only):
- 08:15 to 09:15 (Monday to Friday)
- 15:00 to 16:00 (Monday to Friday)

Permitted HGV Movements

a) The **average** number of HGVs using this corridor, over the duration of the works, shall be no more than 36 in each direction in any one working day (total 72 two-way movements);
b) Notwithstanding (a) above, a **maximum** of 60 HGVs may use this part of the network in each direction in any one working day (total 120 two-way movements);
c) The **maximum** number of HGVs using this corridor, in any working day, shall be no more than 6 in each direction in any **one working hour** (total 12 two-way movements).

If, due to exceptional circumstances, there is a need to exceed the maximum value in (b) above, this should only be done following **advanced** written agreement with the LPA in consultation with the LHA. The are no exceptions to this and the CTMP must highlight a course of action to ensure that the above is adhered to.

The CTMP to be kept up to date and shared with the LHA when changes are made, to ensure that the **average** is achieved.

B6478 Slaidburn Road and B6478 Hallgate Hill (for period of full project)

Permitted HGV Movements

a) The **average** number of HGVs using this corridor, over the duration of the works, shall be no more than 75 in each direction in any one working day (total 150 two-way movements);
b) Notwithstanding (a) above, a **maximum** of 125 HGVs may use this part of the network in each direction in any one working day (total 250 two-way movements);
c) The **maximum** number of HGVs using this corridor, in any working day, shall be no more than 13 in each direction in any **one working hour** (total 26 two-way movements).

If, due to exceptional circumstances, there is a need to exceed the maximum value in (b) above, this should only be done following **advanced** written agreement with the LPA in consultation with the LHA. The are no exceptions to this and the CTMP must highlight a course of action to ensure that the above is adhered to.

The CTMP to be kept up to date and shared with the LHA when changes are made, to ensure that the **average** is achieved.

(iii) Distribution / Assignment

The distribution of vehicles over the strategic road network is 40% from the north and 80% from the south. At this stage, these proportions are not unreasonable for these compounds. However, as further detail becomes available, further evidence is required to ensure that these proportions are still valid.

(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 link or junction capacity. The impacts considered by the LHA relate to the significant increases in the number and proportion of HGV movements, network reliability, operational matters, safety (for all modes), local amenity and its maintenance. As I have stated above, the HGV caps that I have presented above are based on a balanced approach having regard to highway safety, network operation and the HARP project programme.

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 the A671 / Pimlico Link Road / Chatburn Road roundabout (where RW01 is proposed). In addition, LCC has concerns with the increase in use at the A59 / Pimlico Road junction. As highlighted above:

- a scheme has been identified at RW01, to be delivered by this project in advance of any HGVs using this corridor.
- a road marking and signing review is required at the A59 / Pimlico Road junction together with the delivery of any necessary works identified.

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

See separate correspondence from LCC PRoW team.

B4) Public Transport Accessibility and Provision

The CTMP identifies bus services that may be impacted by the proposed construction traffic. The CTMP states that *'following detailed design the Construction Contractor will liaise with the relevant bus companies prior to start on site'*. During the project period, the applicant will be required to monitor bus services, to identify if services are being disrupted, and if so, present mitigation to the LHA and bus service providers.

> *Note: it may be the case that bus stop locations need to be revised during this project. All associated costs to be funded by this proposal.*

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*". Whilst LCC Highways offers a paid-for support service, it is not for the LHA to be responsible in the delivery of a travel plan.

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 their 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, parking, welfare, office, materials laydown and other ancillary development.

It is unclear from the drawings presented to date what provision is proposed for 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 is highly likely that such movements will take place and therefore adequate, safe, and suitable provision should form part of the access layout proposals.

Appendix B4 of the CTMP confirms that a maximum of 20 tipper trucks to transport arisings to WFQ, which will be held at either the compounds or the Quarry overnight. Appendix B4 shows sufficient space within the compounds to hold the vehicles. Tipper trucks must be stored within the compounds or WFQ overnight, and this is to be protected by suitably worded planning condition.

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.

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 areas appear compact, the site red line boundaries are much larger. The drawings indicate that the required plant and materials will be accommodated. Internal layout of all compounds are to be protected by suitably worded planning conditions.

Note: at no time will any construction traffic be permitted to wait on the public highway.

Sustainable Urban Drainage Systems (SuDS)

LCC are 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.

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) Construction Traffic Management Plan

A CTMP has been provided as part of the application. While it is acknowledged that certain details can only be firmed up once a contractor has been appointed by the applicant. However, there are areas where information is still deficient, and I am not satisfied that those matters can be controlled by suitable worded planning condition. Notwithstanding this, for all other matters LCC Highways are satisfied that the content and the principles of the CTMP demonstrate that safe and suitable access can be achieved, for this application. The general

impacts (notwithstanding the exclusions) of the proposal that have been assessed can be managed with appropriate mitigation, as highlighted in these comments, and need to be controlled by condition.

Routing Strategy

The CTMP states the proposed routing strategies for each of the Compounds / Working Areas on the Local Highway Network, to and from the site, as described above in Section A (Access Strategy). Unless otherwise agreed with the LHA, no other routes to access the Compounds / Working Areas should be used.

To comply with proposed routing, the CTMP proposes to monitor vehicles upon site entry/exit and provided monitoring reports (as suggested in Section 7.1). Other measures are also proposed, such as Automatic Number Plate Recognition at key locations on the Highway Network and this is described as 'if feasible/desirable'. LCC Highways consider this element necessary to ensure that vehicle restriction conditions on the links, as suggested in these comments, are adhered to, in order to lessen the impacts of this application. The details of the information to be recorded are yet to be agreed. This information to be controlled by suitably worded planning condition. However, it is expected that the details of the vehicles to be recorded, in and out of the site would include the vehicles' weight, vehicle class, vehicle registration number, and the time, date and route of the movement and driver.

The CTMP sets out the enforcement of the CTMP in Section 8 with potential breaches in Section 8.2 and then sets out and disciplinary procedures in Section 8.3. These are accepted in principle by LCC Highways, but will require updating, and should be protected by suitably worded planning condition.

Access and Highway Works

The agreed site access plans and highway works plans should be shown in Appendix B2 of the CTMP. There are plans that have been passed to LCC Highways via email, and that have not been put into an updated CTMP with updated appendices. Throughout my comments I have made reference to the latest plans, and these are what should be included in the updated CTMP. While the principles of the plans are accepted, these are all subject to detailed design.

Control of Project Traffic

While the CTMP includes the applicants' anticipated vehicle movements to and from compounds within Appendix A2, the suggested vehicle caps in Section B1ii of my comments above indicate the vehicles movements the LHA would support, with the aim that, together with other measures/strategies secured, the suggested caps (from my comments above) provide a practical/workable approach to the applicant, while better controlling the level of impact. As I have already highlighted above, while caps will be monitored as part of the CTMP, it may be the case that caps will change having regard to lesser or greater impacts than anticipated. In locations where 2-way HGV movements cannot be accommodated/managed, LCC Highways require the use of escort vehicles.

In all locations where the carriageway is in close proximity to dwellings, vehicle speeds must not exceed 10mph. In addition, in advance of any HGV utilising the agreed routes, the condition of the carriageway, manhole covers and gullies to be reviewed, with an ongoing monthly review (or when informed by the community) and any undulations, cracking, or resetting of covers / gullies to be made good within 1 working week of the review. This is necessary to reduce/limit vibration and nuisance that these vehicles will cause.

> *Note: the pre-emptive works to be delivered prior to any additional HGVs. It is in the applicants' gift to determine when this will be, linked to planning conditions.*

Route Monitoring and Maintenance

Prior to the project commencing, and during the period of the project (until its full completion), any locations of the carriageway or verge that shows signs of wear and tear or damage should be repaired (including manhole covers). Regular reviews of the Highways should be undertaken and will be protected by a suitably worded planning condition including frequency and agreed timeframes for repairs. A post project review of the routes with any wear and tear or damage repaired within an agreed timeframe to be also included.

(E) Highway Works to be delivered

It is expected that highway works will be required and controlled by condition if Planning approval is granted for this proposal, this is on the assumption that all issues highlighted within these comments are overcome.

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

In addition to the construction of site compound accesses / satellite compound accesses / haul road accesses, other works that may be required are (references to page numbers from my comments above are included):

- Parking reviews will need to be undertaken at the beginning of the project, with a review every 3 months (page 5);
- Speed limit reductions with supporting gateway treatment through villages where constraints exist (limited road width, limited/no footway, limited visibility etc.) (page 5);
- Prior to the project commencing, and during the period of the project (until its full completion), any locations of the carriageway or verge that shows signs of wear and tear or damage should be repaired (including all highway assets, 3rd party assets and consequential costs). A post project review of the routes with any wear and tear or damage repaired within an agreed timeframe (page 5);
- Clear information boards that highlight the duration, progress, remaining works and anticipated vehicles. These are to be located through all villages and communities that will be passed by construction vehicles. Exact locations to be conditioned (page 5);
- Prior to the project commencing, all verges and foliage must be cut back, as a minimum to the edge of the highway and where possible to the edge of the adoption. Cutting back should not be to the extent that it undermines foliage beyond the highway boundary, batters, embankments and tree roots. An assessment to be conducted every 3 months and where necessary, cutting back is also undertaken (page 5);
- To maintain lane discipline, there is a need to renew all road marking / traffic calming schemes, along all routes used by HARP vehicles (page 5);
- Structural surveys are to be undertaken on all structures (including cattle grids) on a regular basis, with additional evidence collected (photographic) and identification of any works required, in line with loading capacities. Frequency of survey and consequences to be agreed. All maintenance works to be carried out and completed as soon as the LHA require. If convoys are proposed, then assessments to include consideration of multiple and cyclic loading from all vehicles in a convoy (page 6);
- In locations where widenings/passing places are provided, resurfacing beyond these limits may be required (page 6);
- A59 / Pimlico Link Road junction road markings to be renewed and cutting back undertaken maximising visibility. A road marking and signing review at this junction with the delivery of any necessary works (page 6);

- Widening at the A671/B6478 (Clitheroe Centre) roundabout. Extents of the works to be determined at the detailed design stage (page 6);
- Temporary vehicle holding area / waiting area south of Waddington (page 6);
- Speed limit reduction through Waddington with supporting gateway treatment (Page 6);
- Highways and traffic management scheme on West Bradford Road (page 7);
- Scheme at A671 Pimlico Link Road / Chatburn Road roundabout maximising sight lines, lane discipline and provision for pedestrians and cyclists (page 7);
- Reinstation of bus infrastructure on West Bradford Road (south of Bradford Bridge) (page 7);
- Initial road widenings, with monitoring of the full route for areas of overrun or conflict (i.e., apexes of bend etc.), during the project, and where required, further widening of the carriageway (page 8);
- In all locations where the carriageway is in close proximity to dwellings, the condition of the carriageway, manhole covers and gullies to be reviewed and to be made good before project commencing, with an ongoing monthly review (or when informed by the community) and any undulations, cracking, or resetting of covers / gullies to be made good (page 10);
- Speed limit reductions in the vicinity of compound accesses with appropriate enforcement mechanisms (page 10); and
- Highway reinstatement (page 12).

This list is **NOT** exhaustive and is clearly subject to ongoing agreements in regard to necessary mitigation and the developing CTMP. The cost of works and maintenance, for the avoidance of doubt, is **NOT** financially capped. The full costs to be borne by the applicant.

In addition, any damage beyond the highway as a consequence of the corridors being used by vehicles associated to the HARP project to be funded by the applicant. This will need to be picked up in a legal agreement. This risk is **NOT** financially capped. The full costs to be borne by the applicant.

> *Note: the above requests are necessary as a consequence of the demand and requirements of this project,* ***on roads and lanes that were not constructed for this level of use.***

(F) Planning Obligations (s106 Planning Contributions)

It is expected that the applicant will confirm commitment to appropriate funding requests or maintenance requests. These may include:

- Funding for a full LCC post, at Grade 9 Level, 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);
- Pedestrian / cycle / PRoW improvements; and
- Funding and support for a local authority partnership forum for the duration of the project, linking to scheme progress, monitoring to potentially negate against the need for district planning enforcement. The forum can be used to discuss other matters of importance to those that are attending.

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.

(D) Road Condition Monitoring and Maintenance Strategy

Road condition monitoring, subsequent surveys, pre-emptive maintenance works, ongoing maintenance and remediation, that is required as a consequence of this application to be funded/delivered by the applicant. These matters must be controlled by suitable worded planning conditions (as provided by LCC) and linked to an LCC approved legal agreement under the Highways Act with the County Council as Local Highway Authority. No works on site can commence until this legal document has been agreed and signed with initial surveys and pre-emptive works being carried out. This is necessary to ensure that access routes will be maintained, allowing unrestricted access, not only for construction traffic but also all other highway users.

Note: This is fundamentally a planning issue as well as a Highways issue. The LHA require support from the LPA on this matter. The condition of roads impacts on noise, vibration, amenity, servicing, waste collection, and day-to-day matters that impact on statutory duties spanning both authorities. It is requested that the LPA provide support to the Local Highway Authority on this matter, including with the inclusion of a suitably worded condition, and inform the LHA of issues arising from highway matters. It is imperative both authorities work cooperatively with the support of the applicant to resolve matters as they arise, so as to not enable permanent and long-term harm or detriment to arise as a consequence of development.

It is important that the necessary controls are in place and that measures will be delivered to limit traffic impacts as well as nuisance and vibration to those properties that are impacted upon. Whilst some issues arising relate to and may be resolved by changes to the highway, they may require other authorities involvement (Lancashire Constabulary, the LPA). Strong communication and cooperation between all will be required in order to ensure that highway operation is safe and convenient, and the adverse impacts of the development are addressed in a timely manner by the applicant on an ongoing basis.

(E) 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, at Grade 9, for the duration of the 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. This provision to be controlled by a suitably worded planning condition.

Conclusion

These statutory comments have regard to all relevant information uploaded on the Ribble Valley Planning Portal and provided to LCC Highways via email, to date. These include a Transport Assessment, Construction Traffic Management Plan and other relevant plans and documentation.

With consideration for all the information now provided, I consider that the impacts of the proposals on the Local Highway Network, could be made acceptable. However, this is subject to a number of matters being suitably addressed and secured by condition including; agreed

highway changes, HGV caps and restrictions, a legal agreement in place to overcome highway deterioration and maintenance issues, PRoW management, maintenance and diversions (as provided in separate correspondence by LCC PRoW Team), and the provision of a resource to enable the highway authority to work closely with the applicant during the full period of the project.

It is important that the necessary controls are in place and that measures will be delivered to limit traffic impacts as well as nuisance and vibration to those properties that are impacted upon. Whilst some issues arising relate to and may be resolved by changes to the highway, they may require other authorities involvement (Lancashire Constabulary, the LPA). Strong communication and cooperation between all will be required in order to ensure that highway operation is safe and convenient, and the adverse impacts of the development are addressed in a timely manner by the applicant on an ongoing basis.

Note: Within these comments I make reference to several matters. I wish to reiterate:

- *I consider that Lancashire Constabulary support to that proposed is required. In the absence of this (including enforcement) further mitigation will be required to make the development acceptable (refer to Page 10);*
- *That proposed is subject to RSA and ORA. The outstanding information expected may influence mitigation and thus may require further amendment or consideration. The outcome of this is anticipated shortly (refer to Page13).*

These issues do not necessarily impede the ability for this application to be determined if suitably controlled. Also note that the s278 legal agreement must be signed prior to any progress on this project, including pre-commencement works (refer to Page 6).

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 sincerely,

Neil Stevens
Highways Development Control Manager
Lancashire County Council