

Ribble Valley Borough Council
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FAO Nicola Hopkins
Director of Economic Development and Planning

BY EMAIL - 8 March 2023
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Dear Nicola

**RE: Planning Application No: 3/2021/0661 - Marl Hill Section of works to the Haweswater Aqueduct
Comments of Grindleton Parish Council**

I write in my capacity as Clerk to Grindleton Parish Council (GPC).

Members of GPC have become aware of documents submitted by United Utilities (UU) in relation to its planning application 3/2021/0661. These documents were presented to members of GPC at their meeting on 7 March. It is understood that the UU application will receive further consideration at a meeting of the Planning and Development Committee scheduled for 9 March, some 2 days after the Parish Council meeting. My sincere apologies for submitting these comments to the Local Planning Authority (LPA) so close to the date of its committee meeting, but this was unavoidable given the proximity of the two dates. Notwithstanding this unfortunate scheduling, members of GPC are fully aware of the potential impact that HARP will have on local residents (particularly those who live on East View) and would ask that the LPA give due consideration to the comments expressed below.

Members of the Parish Council have paid close attention to the draft Construction Traffic Management Plan (CTMP), and are pleased to note that the proposed temporary crossing of the River Ribble has been retained in these latest proposals. When completed, this will greatly reduce the flow of heavy vehicles through Chatburn, over Grindleton Bridge and then past the houses at East View. Unfortunately, however, the draft CTMP indicates that - during at least the 9-month period when the temporary river crossings will be under construction - UU intends to transport the piling equipment etc required to build both it and the proposed Hodder crossing along this route, with the disruption and inconvenience for residents that this will entail.

The draft CTMP lists a number of measures seeking to mitigate the impact on the village during the estimated 9-month construction period of the temporary crossings. Members considered these at length on 7 March, commenting as follows:

Proposed Mitigation	Member comment
<p>The use of time restrictions when heavy vehicles would not travel, thereby avoiding the “school run “, as well as restrictions on the number of convoys per day / week</p>	<p>Members welcome the proposed introduction of time restrictions due to the severe congestion around Grindleton Bridge at school drop-off and collection times. However, they would wish to see robust enforcement in place to ensure that these are adhered to, and also seek reassurance that – during periods of school holidays – the restrictions will stay in place to ensure ease of traffic flow for commuters.</p>
<p>The use of rolling roadblocks (section 4.1) at key locations such as Grindleton Bridge</p>	<p>Members fully understand the difficulties that lorries will face when seeking to turn left from East View onto Grindleton Rd and head towards West Bradford; this is a tight junction which, even after the proposed road modifications are carried out, will pose problems for the larger vehicles. However, members fear that the use of rolling roadblocks in this vicinity will cause severe traffic congestion. If we assume that each phase of the roadblock will take around 10 minutes, then the potential traffic build-up in this time will be considerable and may well extend a significant distance in all directions, including up Grindleton Brow towards the village.</p> <p>Members do not believe that the likely impact of rolling roadblocks has been fully investigated by UU, and would seek further reassurance that all steps to mitigate disruption here have been taken.</p>
<p>Access to PROWS should not be restricted (section 5.3)</p>	<p>Members are keen to see access to all PROWs preserved, but wonder if the claim in the CTMP is a little disingenuous. For instance, there is a popular concessionary footpath linking the PROWs numbered FP0300115 and FP0300114. Access to this route currently requires walkers to walk in the road for some distance along Ribble Lane (there being no footpath), as well as having to cross Ribble Lane to pass from one PROW to another. This is a road down which heavy traffic will pass, and at such times access to the footpath will indeed be impacted, especially if a</p>

	<p>rolling roadblock is in operation. At the very least, walkers will be required to exercise extreme care when joining either of these PROWs and it is not apparent that these concerns have been adequately recognised in the CTMP.</p> <p>There are other sections of the proposed temporary route where pedestrians will be directly put at risk. These include:</p> <ul style="list-style-type: none"> • the lack of footpath where residents seek to access East View from Grindleton Brow, directly crossing the difficult junction at Ribble Lane / Grindleton Rd; and • pedestrians walking from Green Lane to Grindleton Bridge (past the East View / Grindleton Rd junction) are obliged to walk along Grindleton Road, where again there is no footpath to offer protection from oncoming vehicles.
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In addition, members identified a number of other concerns arising from the draft CTMP:

Concern	Comment
<p>Section 6.4 states that a precondition survey will be carried out (presumably to act as a baseline for vehicular impact), in 3 identified areas, none of which include the road from Grindleton Bridge past East View.</p>	<p>Members are clear in their view that a precondition survey of roads should also be undertaken in the village of Grindleton, particularly on Ribble Lane between Grindleton Bridge and Grindleton Rd. The residents of East View have long held concerns about the road surface here, and any further deterioration due to HARP is simply unacceptable.</p>
<p>The draft CTMP, at page 50, makes reference to considerations to access over Grindleton Bridge, parked vehicles and alteration at the junction of East View / Grindleton Road, but gives no detail</p>	<p>Members feel that the CTMP fails to pay adequate attention to the impact that HARP will have on the residents of East View. This is particularly true with regard to the parking of residents' vehicles, which will have to be left on Ribble Lane as large vehicles pass by in close proximity. This is not only inconvenient but also dangerous. Residents would ask that UU provide safe car parking for residents, eg by funding the provision of car parking on land owned by the business based at The Spinney.</p>

<p>Whilst it is good that a Highways Stakeholder Group (HSG) will be established to oversee the process, section 7.2.2 states that “Local community groups (e.g. Parish Councils, special interest groups) will be made aware of the HSG as a vehicle for collating and investigating enquires from the public”.</p>	<p>Members remain unclear as to the role of the proposed HSG, and whether they – as local community representatives - will have any access to it (as opposed to being made aware of it).</p>
<p>There will also be a Community Engagement Group and a Travel Plan Co-ordinator (sections 7.2.2 – 7.2.4), both of whom seem to be leading on contact with residents etc.</p>	<p>Members see the issue of communication as absolutely key to the successful delivery of the project. Given the length of the construction period it is inevitable that problems will arise, and parish councillors will bear the brunt of any community concerns. Members are insistent upon having a direct and open channel of communication by telephone to a dedicated Single Point of Contact (SPOC), either within LCC or UU, who is at a senior level and with enough “clout” to be able to resolve issues as they arise.</p>
<p>9-month construction period – further assurances required</p>	<p>In the initial period of 9 months, when construction traffic will facilitate the building of the temporary river crossings, what assurances can be given that such traffic will only service the temporary crossings and not be used for any other purpose? Members would find it unacceptable if heavy vehicles passing through the village were to be used for construction of the tunnel.</p> <p>In addition, it is striking that no consideration is offered to the protected species (such as otters) which live in the vicinity of Grindleton Bridge.</p>

In general terms, members would wish to make two other points about the CTMP which they would ask the LPA to consider:

- the CTMP is lacking in detail as to how the residents of Grindleton will be protected during the key 9-month period. The Parish Council feels that the village has been overlooked by UU and not given the attention that is required; and
- the Parish Council remains concerned that UU is intending to implement a number of road modifications, which it views as “enhancements”. In contrast, the Parish

Council would emphasise that road modifications should be kept to a minimum, and a guarantee provided that these will be fully removed at the earliest opportunity with the land restored to its original condition.

In a further development, parish councillors have subsequently been given access to a copy of Lancashire County Council's (LCC) initial comments on the draft CTMP. This document, in the form of a letter to yourself from the Highways Development Control Manager and dated 17 February 2023, is clearly of significance and will presumably carry great weight in determining whether to approve the draft CTMP. (This letter has been circulated to Grindleton parish councillors but has not been distributed more widely). I have been asked to inform you that members of Grindleton Parish Council are very supportive of the comments made by LCC, and share the concerns expressed in the letter insofar as they relate to the village of Grindleton. In particular, members would draw your attention to the following aspects:

Topic	LCC comment	GPC response
Route 1b (during 9-month period to build the temporary river crossing)	P8 – a “strong signing strategy will be required at all pinch points”, including the East View Bridge and the East View / Grindleton Rd junction	This proposal would appear to be in addition to the specific use of rolling roadblocks set out in the CTMP. Members would support any proposal to keep residents informed of the timings when vehicle convoys may be expected etc and so can try to manage their journeys accordingly.
Route 1b (during 9-month period to build the temporary river crossing)	P17 – proposed restrictions on time and frequency of vehicle movements	As stated above, members are supportive of this approach (subject to an adequate enforcement regime).
Main Construction Route from 2023 – 2030	P11 – in enforcing vehicle movements, the use of SIDs and police mobile cameras is proposed (though little detail has been provided by UU)	Members support this approach
General	P22 - Enforcement of the CTMP should be “protected by suitably worded planning condition”	Members support this approach
General	P24 – the appointment of a dedicated member of staff “for the duration of the project to address the requirement of	Members support this approach

	ongoing collaborative work, required to ensure the best management of the CTMP”	
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In conclusion, members note that certain matters of real importance to the local community are not included in either the draft CTMP or the LCC response. These include the issue of a legacy fund and whether one will be established to compensate residents for their significant inconvenience over a lengthy period. Members accept that neither the draft CTMP nor the LCC response may be the appropriate documents in which to outline details of a legacy fund. However, the apparent lack of progress on this topic is worrying, and members are extremely keen to ensure that this matter is not overlooked.

GPC is grateful for this further opportunity to submit its further comments, which it hopes will be given due weight and consideration by the LPA.