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FAO Nicola Hopkins
Director of Economic Development and Planning

BY EMAIL - 1March 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 West Bradford Parish Council**

I write in my capacity as Clerk to West Bradford Parish Council.

Thank you for your email dated 7 February 2023, in which you made available a number of documents submitted by United Utilities (UU) in relation to its planning application 3/2021/0661. These documents were presented to members of West Bradford Parish Council at their meeting on 22 February. You will be aware that the village of West Bradford is particularly affected by the HARP construction scheme, and members have therefore asked me to pass on their thanks for giving them access to this latest information.

I understand that the UU application will receive further consideration at a meeting of the Planning and Development Committee scheduled for 9 March. West Bradford Parish Council would be grateful if its comments, set out below, could be taken into account at that time.

Many of the detailed proposals set out in the 8 attachments which you helpfully provided relate to road improvements required in Waddington, specifically at the junction of West Bradford Road and Slaidburn Road at the Higher Buck, and as such fall largely outside the remit of West Bradford Parish Council. However, the main document - which impacts the village of West Bradford directly - is the draft Construction Traffic Management Plan (CTMP); members have now this discussed at length and have asked me to put forward their comments.

On a positive note, members were pleased to learn that the proposed temporary crossing of the River Ribble has been retained in these latest proposals. When completed, use of the temporary crossing (identified as "Route 2" in the draft CTMP) will keep much heavy traffic out of the village for the greater part of the construction period, as well as promoting road safety in the vicinity of the Waddington and West Bradford School. Unfortunately, however, the CTMP indicated that - during at least the 9-month period when the temporary Ribble crossing will be under construction - UU intends to transport the piling equipment etc required to build both it and the proposed Hodder crossing through West Bradford on heavy vehicles. The proposed short-term use of this traffic route (identified in the draft CTMP as "Route 1") is said to be on an "infrequent" basis only, and no road modifications to accommodate it are proposed.

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, commenting as follows:

Proposed Mitigation	Member comment
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	Members request specific reassurance that heavy traffic will not impact the already heavily congested road outside Waddington and West Bradford School, the safety of children and their parents being of paramount importance. It is imperative that any restrictions on the passage of heavy vehicles will be adequately policed, as experience suggests that time restrictions are often ignored by contractors with deadlines to meet
The use of rolling roadblocks at key locations such as the difficult bend next to the 3 Millstones restaurant	Members are accepting of the need for rolling roadblocks, but would expect them to be adequately managed, with the deployment of appropriate staff and escort vehicles in order to ensure safety and minimise inconvenience to road users
Access to PROWS should not be restricted	Members noted this with approval

In addition, members identified a number of other concerns arising from the draft CTMP:

Concern	Comment
Section 6.4 of the CTMP states that a precondition survey will be carried out (presumably to act as a baseline for vehicular impact), from “West Bradford Road, Waddington from the proposed junction with Ribble crossing temporary haul road to The Square, Waddington”. It therefore makes no reference to the village of West Bradford itself.	Members are clear in their view that a pre-condition survey of roads should also be undertaken in the village of West Bradford. The surface of Grindleton Road has been re-laid within the past couple of years, after a long period of neglect, and members were insistent that any damage arising from heavy vehicles should be made good as a matter of priority.
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”.	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>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. Members would expect any SPOC to adopt a flexible, dynamic and proactive approach to community engagement; only time would tell whether this is the case.</p>
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Members of the Parish Council are intending to be present at the meeting on 9 March, if only to observe proceedings.

In a further development, parish councillors have subsequently been given access to a copy of LCC’s 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 West Bradford parish councillors but has not been distributed more widely). I have been asked to inform you that members of West Bradford 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 West Bradford. In particular, I would draw your attention to the following aspects:

Topic	LCC comment	West Bradford Parish Council comment
Route 1b	P8 – a “strong signing strategy will be required at all pinch points”, including the difficult bend at the 3 Millstones restaurant	<p>Members agree and strongly support this statement. However, they wish to be specific and add that – as well as at the 3 Millstones – an additional point of concern is the stretch of Grindleton Rd between Grindleton and West Bradford; there are a number of tight bends on this road and additional traffic management (whether in the form of a rolling road block or other means) will be required.</p> <p>In this vein, members would support work suggested as necessary by LCC to maintain safety at other key road junctions, eg the A59/Pimlico Rd junction (pages 6 and 19).</p> <p>It is assumed that the cost of all physical measures such as any review</p>

		of road markings, increased signage etc would be borne by the applicant and not come from public money.
Bradford Bridge	P9 – “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.”	Given that Route 1c is intended to deliver traffic to the construction site of the temporary river crossing south of the Ribble (without any need for traffic to cross the bridge), and Route 1b will divert other traffic through Chatburn and away from Bradford Bridge during the 9-month construction period, it is not immediately apparent why heavy vehicles would need to traverse Bradford Bridge. Is it suggested that the bridge foundations could be disturbed by construction activity in the vicinity? In any event, the Parish Council would support any steps taken to ensure the longer-term viability of Bradford Bridge, which is a vital road route for residents travelling to and from the village.
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 recognise the importance of enforcing all traffic movements / restrictions, and would support the use of SIDs or other means to ensure that requirements are adhered to.
Route 1b and Main Construction Route from 2023 – 2030	P16 and 17 – proposed restrictions on time and frequency of vehicle movements	Members fully support LCC’s proposals to ensure that impact on village life is kept to a minimum, with heavy vehicles not travelling excessively through the village or at inappropriate times of the day
General	P22 - Enforcement of the CTMP should be “protected by suitably worded planning condition”	Members support this proposal
General	P24 – the appointment of a dedicated member of staff “for the duration of the project to address the requirement of ongoing collaborative work, required to ensure the best management of the CTMP”	Members support this proposal

Finally, members note that a number of other general issues which they have previously raised are not included in either the draft CTMP or the LCC response. These include:

- whether a legacy fund will be established in order to compensate residents for their significant inconvenience over a lengthy period; and
- whether any legacy fund will include the payment of compensation to businesses who will be severely impacted by increased traffic flow through the village, particularly during the 9 months taken to construct the temporary Ribble crossing.

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 (to which local communities attach considerable importance) is worrying, and members are keen to ensure that this matter is not overlooked.

Thank you again for giving West Bradford Parish Council the opportunity to submit its thoughts prior to the meeting on 9 March.