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**Planning Application 3/2021/0661**

## **HARP PROPOSALS**

**Latest Submission from United Utilities to use the B6478 through Waddington for construction traffic whilst the Haul Road Route (Option 2) is constructed.**

Dear Mr Macholc,

As you are aware there have been a series of proposals put forward by United Utilities during the planning process regarding road transport.

I personally supported the development of the Haul Road with a Ribble Crossing that then made its way to join the Fell Road North of Waddington via land to the North of Waddington Almshouses . This would have prevented my fellow villagers [REDACTED] from dealing with a massive increase in vehicle numbers. Unfortunately, the extension was withdrawn by United Utilities on engineering and ancient woodlands grounds by United Utilities. I am well aware that as a local authority you can only deal with applications that have actually been made.

United Utilities have now confirmed that they want to adopt Route Option 2, referred to as The Ribble Crossing or the Haul Road. I support this as the best of the routes proposed by United Utilities to minimise the impact on the villages of Waddington, West Bradford, Chatburn and Clitheroe.

United Utilities have now defined a new project phase (1a) in their documentation.

I do however, strongly object to the proposed use of the B6478 through Waddington for HARP vehicles, for a loosely defined *temporary* period of 9 months whilst Route Option 2 and the Haul Road is constructed, on the following grounds:

1. The temporary use is nonsensical in that the reason that Route 2 is being put forward is to avoid the need to take HGV and other construction traffic through any of the local villages. Why did United Utilities submit the plan to build the Haul Road in their earlier applications without stating that in order to build it they would have

to bring the vehicles involved in constructing it through Waddington and then along West Bradford Road to the Haul Road's Northerly exit onto the road network?  
This is material in that it is yet another example of United Utilities not presenting the full facts during their consultation processes.

2. The construction of the Ribble Crossing and Route 2 are the key enabling works for the project. The route 2 and Haul Road should be fully built and commissioned before any construction traffic is allowed through Waddington and then only along a short section of West Bradford Road.
3. There is surely no engineering reason why the Haul Road cannot be constructed solely in a Northerly direction from the Cement Works thus negating the need to route vehicles through Waddington. United Utilities should have to apply for special permission to access the Haul Road from its Northerly exit on West Bradford Road. This would need to be exceptional.
4. The construction of the Hodder Crossing at Newton should only be started once the Haul Road is completed. This would remove the need for vehicles to pass through Waddington on the B6478 at all for this part of the construction programme in Newton.
5. The only beneficiary of their proposal will be United Utilities themselves as they will be able to commence work for the Hodder Crossing in parallel with the construction of the Ribble Crossing. United Utilities will save time and therefore money to the detriment of 75 residencies in Waddington on the B6478 and hundreds of residencies in Clitheroe on the route to Brungerley Bridge. Given the amount of time they have already wasted in their planning application this should not be a factor in your deliberations.
6. The possibility exists that if there is any slippage in the construction programme for Route 2 (Newts, Ground Conditions, Engineering, Ancient Earthworks etc.) that by granting permission for the use of the B6478 in parallel with the construction of the Haul Road that the route of the B6478 through Waddington will become the ONLY route for vehicles for an impossible to define period.
7. The plans submitted by United Utilities are contingent on spoil from the tunnels being deposited in Waddington Fell Quarry. To my knowledge no commercial agreement is in place to allow this to happen. If the spoil has to be transported away from the area to be deposited elsewhere the need for the Haul Road and Route 2 are even more pronounced.

8. The reasons for avoiding the use of the B6478 through Waddington under any circumstances for the use of HARP construction traffic and the construction of the Haul Road are as follows:

**The B6478 is not fit for current purpose**

The B6478 through Waddington is not fit for purpose at the present time.

The traffic through the village is currently being seriously impacted by HGV's which are servicing the housing developments at Waddow Heights and Hawthorne Place in Clitheroe. High vehicles transporting items such as roof trusses, building materials and house removals are unable to pass under the rail bridge in Clitheroe and are coming via other routes through Waddington. Their journeys are through Waddington twice.

Significant increases of light vans and taxis have been recorded following the boom in home shopping and take away food deliveries during lockdown. This has not dissipated.

The school run is a well-documented issue twice a day in Waddington.

The increased use of the B6478 routes for HARP construction traffic would present significant additional challenges to an already stressed road network

**The state of repair of the B6478**

The capability of this road to withstand the impact of multiple Heavy Goods Vehicles movements 6 days a week and at all times of the year, without the need for extensive maintenance is extremely unlikely.

The road surface is already disintegrating due to lack of LCC maintenance exacerbated by the HGV traffic using Waddington Fell Quarry, construction vehicles destined for housing sites in Clitheroe and numerous leaks in the mains water system which have been stopped and patch repaired by United Utilities.

Inevitably, when the road has to be repaired due to the proposed HARP traffic in phase 1a this will result in prolonged periods of road repair with traffic lights. This would further concentrate the traffic and traffic jams in Waddington on the B6478.

Inevitably the optimistic and approximate 9 months plan for phase 1a will be stretched.

**Mains Water Supply**

In the past few weeks United utilities have had to attend multiple leaks of the mains water supply on the B6478 through Waddington. The water supply pipes are made of varying materials are likely being impacted by the increase in HGV traffic and this problem would be exacerbated by even greater number of vehicles.

### **United Utilities data transparency and accuracy**

The presentation of data on traffic numbers by United Utilities is far from transparent for a number of reasons and in the absence of more detail cannot be relied upon to demonstrate the real impact from road vehicles used in the Harp scheme.

This is an engineering project which needs to know vehicle types, journey details, journey times, payload details in order for contractors to tender. There is no good reason why this information cannot be shared with residents, unless the transparency would put United Utilities at a disadvantage.

I note Lancashire Highways have delayed their response to the proposals due to lack of detail also.

United Utilities traffic baseline data was taken some time ago and needs to include the current Clitheroe housing development traffic mentioned above. There should be a new survey conducted.

United Utilities, during public consultation, have been challenged about the way they present the increase in vehicle movements.

United Utilities use an increase in total vehicle numbers as a % measure. The base clearly includes cars and light vehicles. What is of most importance is the growth in HGV's and large vehicles. Presented in their way it underestimates the impact of HGV's and large vehicles. Given this is an engineering project where the type of vehicles, timing of journeys by hour, by week are known ... if only for project costing and tendering purposes, the lack of detail in the traffic counts is poor and is a material consideration.

The use of averages is the easiest way to smooth the apparent impact on residents especially when their proposed working hours are from 7am till 7pm Monday to Friday and 7am to 1pm on Saturdays. What is important is exactly the times of day, the number and types of the additional traffic.

Waddington Parish Council have data (from their movable speed camera) on total vehicle movements by hour into Waddington on all the roads. This should be meshed with the known vehicle movement for HARP traffic to provide a true picture of the disruption the proposed 1a phase will inflict on residents. I suspect this will not make for good reading for residents.

It is interesting to note that the figures quoted on their public information guide on the HARP website regarding phase 1a says

*The red route through Clitheroe and Waddington would be the main route during this initial work, with typically between 3 and 9 vehicle movements per hour and a peak average of up to 16 vehicle movements per hour.*

The numbers used on the maps submitted with the revised planning application states *maximum 122 and average 78 daily.*

The use of two different measures is further evidence of the lack of transparency.

What use is a *typical average* which has a range as wide as 3 to 9.

United Utilities numbers are calculated for the length of the whole project for phase 1a. If they can only give an approximate time of 9 months for the length of this phase how can they give an accurate daily average?

Even if we accept there is some hard data driving these averages, a peak average does not bring comfort to residents.

If United Utilities are true to their previous word and will avoid having their vehicles clash with the school run, on a maximum per day of 122 vehicles and a peak average of 16 per hour you would have the following ADDITIONAL traffic volumes going through Waddington. The peak average of 16 could operate for seven and a half hours daily, for weeks at a time, with an additional vehicle less than every 4 minutes. If the majority are HGV's this is even worse.

<u>Time of Day</u>	<u>Max per hour</u>
7 to 8	16
8 to 8.30	8
8.30 to 9.30 School Run	0
10 to 11	16
11 to 12	16
12 to 13	16
13 to 14	16
14 to 15	16
15 to 16.30 School Run	0
17 to 18	16
18 to 19	0
Total Daily	120

### **Monitoring and controlling HARP vehicle movements**

From a project management point of view, it is highly unlikely that the delay in the working day described above will be adhered to if the school run amnesty is put in place. Contractors will not wish to have vehicles and operatives parked up for two and a half hours a day and I suspect most would knock off for the day at 3pm in this scenario. If the vehicles are allowed unmonitored and uncontrolled access via the B6478 through Waddington during phase 1a these maxima will be broken at will.

The construction of the Haul Road from South to North and the phasing of the Hodder Crossing until after the Haul Road is built will solve this problem

The control of light vehicles travelling to the tunnel sites has not been satisfactorily solved by United Utilities. Human nature and convenience will always lead individuals to want to make their way independently to their place of work. The use of the park and ride scheme linked to the Haul Road project is an attempt to control this. If the project starts without this in place it will set the precedent for light vehicles using the local road network for the whole of the project.

Once the Haul Road is built there needs to be a monitoring, reporting and sanctions scheme put in place in order to prevent HARP vehicles of any type from using the B6478 through Waddington.

### **Road Safety**

Road safety is a major issue for a number of reasons.

There is a large section of the B6478 between Waddington Old Hall and North of the Social Club where there is no pedestrian footpath. The route is used by parents with children en route to the village school and large number of walkers, runners, cyclists and horse riders.

Walkers and runners increased significantly during lockdown with many people taking a circular route from Clitheroe via Brungerley Bridge, Waddington and Edisford Bridge. The numbers have maintained since the pandemic as people have maintained their new found healthy lifestyles.

Waddington is a major route for long distance cyclists whose numbers have again increased significantly since Covid and lockdown

Waddington Parish Council have raised concerns with Lancashire County Council about the speed of vehicles leaving the village towards Brungerley Bridge from Waddow View. The stretch of Clitheroe Road known as Spring Gardens is used as an acceleration strip from a 30mph zone to a national speed limit sign which can be clearly seen from 100 meters away. The desire to accelerate is promoted by delays in travelling south through Waddington in the section between

**Waddow View and Waddington Old Hall where there is no pavement and the road is not wide enough to take 2 vehicles. With more delays this situation will get even worse and represents a major risk to residents of Spring Gardens**  
**Along the B6478, through Waddington on the sections of road with no pedestrian footway provision , cars are frequently parked at these locations. Construction vehicles will not be able to use the highway simultaneously at these locations. These issues do not appear to be shown or highlighted in the proposals, nor any solution proposed.**

**The safety of all users in the village will be put at risk by routing vehicles through Waddington on the B6478.**

- 9. There are 75 residencies in Waddington on the B6478 that will be affected directly by any use of the B6478 .The use for 9 months is unacceptable and not necessary if the Haul road and Ribble crossing are constructed in a northerly direction and the Hodder crossing is delayed until the Haul Road is completed.**
- 10. All residents will be affected indirectly with delayed journey times into and from Clitheroe. There will clearly be delays to the bus service widely used by elderly residents.**

**In summary I would submit that you reject the proposal to use the B6478 on any basis whatsoever for HARP construction traffic. The Haul Road has been proposed to help protect the vast majority of residents from the impact of the HARP construction traffic. Granting temporary permission to use the B6478 completely undermines the whole point of the Haul Road.**

Yours sincerely



