



23 July 2021

Ribble Valley Borough Council

Planning Department

Council Offices

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Dear Mr Macholc

RE: Planning Application No: 3/2021/0661 - Marl Hill Section of works to the Haweswater Aqueduct

I write in my capacity as Clerk to West Bradford Parish Council. As a statutory consultee, the Parish Council always seeks to balance the need for any development against the residential amenity of parish residents. Members of West Bradford Parish Council have examined the above proposal put forward by United Utilities (UU), and have asked me to submit the following observations on their behalf.

Preliminary remarks

Firstly, it is important to state that members fully appreciate the need to renew the length of pipeline in question. The Planning, Design and Access Statement states that the "Proposed Programme of Works is essential to protect future water quality and provide a more resilient supply of clean drinking water", an objective which members would clearly not wish to oppose.

Furthermore, members of West Bradford Parish Council are conscious that the main boring activity will not be carried out within West Bradford parish itself, but in the neighbouring parish of Waddington. However, it is fair to say that - due to its location on key access routes - the village of West Bradford will be greatly impacted by the requirement to transport materials and workers to

and from the Waddington site, and accordingly members view the proposal as one of real significance for the parish.

The Parish Council has participated in a number of pre-application consultation events held by UU, including:

- UU attendance at a special meeting of the Parish Council on 16 June 2020;
- virtual briefings for Chair and Vice Chair of the Parish Council on 13 January 2021 and 24 March 2021; and
- a webinar held on 3 June 2021.

In paragraph 2.4.8 of the Community Impact Statement, UU makes the following comment:

“A section of the construction traffic access route (both route option 1 and route option 2) are within the parish of West Bradford. In June 2020 United Utilities held a socially distanced meeting with West Bradford Parish Council at West Bradford Village Hall and a virtual meeting in January 2021. Between those meetings, updates were provided by email and phone regarding feedback received from the virtual exhibition and the subsequent development of traffic management proposals that would have implications for West Bradford parish.”

Members are grateful for UU’s willingness to enter into dialogue with them on four occasions in the 12 months from June 2020, but would politely point out that this process was not without its difficulties. Indeed, three attempts by the Parish Council to constructively engage with UU prior to the session on 24 March went unacknowledged.

Haulage Route options

The choice of route for vehicular traffic to access the boring site is the predominant issue for members of the Parish Council, and as such their submission will initially focus on this particular aspect of application 3/2021/0661.

Chapter 5 of the Planning, Design and Access Statement sets out two options for traffic to access the Waddington site:

- a) Haulage Route Option 1 sends traffic over 3.5m in height, or consisting of Abnormal Indivisible Loads (AILs), from the A59 via Chatburn and passes directly through the village of West Bradford; and
- b) Haulage Option Route 2 involves the creation of a temporary crossing of the River Ribble between West Bradford Road in the south (opposite Ribblesdale Cement Works) and West Bradford Road to the north west (to the west of Waddington and West Bradford Primary School).

Members of West Bradford Parish Council wish to express their support, in the strongest possible terms, for Haulage Route Option 2. Their reasons for giving such unequivocal support are articulated below:

- i. the creation of a temporary river crossing would mitigate the otherwise considerable impact of heavy goods vehicles passing directly through the village. It has proved difficult for members to locate, within the vast range of documentation submitted as part of the planning application, details of the number of additional vehicle movements anticipated through West Bradford in the event that Haulage Route Option 1 is adopted. However, in March 2021 UU confirmed to West Bradford Parish Council that the number of additional vehicle movements will be in the region of 160 per week at peak operational time. This

figure is made up of 4 vehicle movements per hour, over an 8-hour day (excluding school times), for 5 days per week. Bearing in mind the size of the AIL vehicles concerned (the term "AIL" encompasses mobile cranes and boring machinery), and the unsuitability of the rural road network, members believe this burden on village life to be unacceptable when a viable alternative – ie Haulage Route Option 2 - is available;

- II. Members would wish to expand upon the comment above regarding the unsuitability of the existing road network through the village of West Bradford. Specifically, the sharp and steep bend to the west of the 3 Millstones on Waddington Road is difficult for normal traffic, let alone AILs. Even if traffic control measures are deployed at this "pinch point", as UU suggest, members are concerned that traffic flow will be severely disrupted. Many local residents have children attending Waddington and West Bradford primary school, and this section of Waddington Road leads directly to the school itself. Traffic flow past the school is already congested at peak times (ie the beginning and end of the school day) and it is inconceivable that AILs could safely negotiate this route without putting schoolchildren at risk. UU suggests that inconvenience to parents and risk to schoolchildren could be minimised by imposing a condition on the planning consent to prohibit AILs from passing the school at key times; see paragraph 122 of the Planning, Design and Access Statement. However, members are sceptical that such a condition would be adhered to or sufficiently enforced (given the scarce officer resources available to it) by the Borough Council as Local Planning Authority (LPA). If approved, Haulage Option Route 1 would carry significant road safety risks and in effect would amount to "an accident waiting to happen". In contrast, Haulage Route Option 2 would divert all AILs and other site traffic over the temporary river crossing and safely past the school, as well avoiding other traffic pinch points en route;
- III. the otherwise negative impact on residential amenity caused by noise / vibration from AILs passing directly through the village would be greatly reduced. In particular, members note the comment in paragraph 249 of the Planning, Design and Access Statement – under Haulage Route Option 2 "Construction road traffic is not anticipated to result in significant effects during the operation of the Proposed Ribble Crossing"; and
- IV. whilst clearly the capital cost of constructing a temporary river crossing would be considerable, this would at least be partially offset by removal of the need to carry out alterations to the highway / existing Ribble crossings in the undesirable event that Haulage Route Option 1 is preferred. Similarly, members are conscious that passage through the village of up to 160 AILs per week would have a detrimental effect on the recently-resurfaced Grindleton Road. Members are grateful to UU for verbally confirming on 24 March 2021 that any highway defects caused by this traffic would be remedied (which again should be enshrined in a planning condition), although again any such cost would be saved if Haulage Route Option 2 is chosen.

In summary, the Parish Council has consistently maintained that Haulage Route Option 2 is the only suitable outcome for the village. In June 2021, the Parish Council posted the following comment – essentially supporting Haulage Route Option 2 – on its website:

"...one option is for a new river crossing and temporary road from Bradford Bridge to the west of Waddington and West Bradford Primary School, the other is for increased heavy vehicle traffic passing through West Bradford itself. Subject to seeing the detail of each

proposal when the planning application is made, the Parish Council remains committed in principle to the former.”

No detail provided since that time has caused members to reassess their opinion on this matter.

Impact on wildlife

It has been suggested to members that the construction of a temporary river crossing may cause some impact on wildlife in the vicinity. Members have reflected on this issue and, whilst always mindful of the importance of ecological matters in such a rural environment, feel that in this instance only a small section of the River Ribble (a river some 121km in length) would be affected. On balance, therefore, it is felt that the positive benefits to the villagers of West Bradford arising from Option 2 far outweigh any environmental concerns.

Clitheroe Park and Ride / HGV Holding Area

Members would support the establishment of both such sites in conjunction with the adoption of Haulage Route Option 2, on the grounds that they would (i) allow AIL journeys over the temporary river crossing to be managed / scheduled – this would hopefully further reduce concerns in relation to Waddington and West Bradford primary school; and (ii) that overall vehicle journeys would be reduced if site staff are taken collectively to their workplace on buses.

Impact on farming community

The Parish Council supports Haulage Route Option 2 on the grounds that it will cause minimum disruption to the majority of local residents. However, members are conscious that farmers play a significant role in the local economy and would wish to ensure that any landowner affected by the temporary river crossing is appropriately compensated by UU.

In dialogue with members, UU has also confirmed that – on conclusion of the project – any land affected by the development activity will be restored to its original condition. The Parish Council would ask that the LPA mandate this obligation through a planning condition.

Public Rights of Way (PRoWs)

Should the planning application be granted, a number of PRoWs will be impacted. Indeed, the Planning, Design and Access Statement states:

“...the Proposed Ribble Crossing (Haulage Route Option 2) would intersect a total of four PRoWs which would be directly or indirectly affected during construction. Temporary diversions and controlled crossing points would be implemented to maintain access along the right of way network.”

The Parish Council is aware that land to the north west of Bradford Bridge is well-used by local dog-walkers and ramblers. Once again, during previous dialogue with UU, assurances have been given that safe public access across land affected by the development will be preserved. Again, the Parish Council would ask that this is mandated by LPA through planning conditions.

As an aside, members have observed that – during the pandemic – local PRoWs have been increasingly used by non-residents of the village, who have parked on West Bradford Road to the south of Bradford Bridge. Should planning approval be granted, UU may wish to bear this in mind when developing their plans for implementation of Haulage Route Option 2.

Statement of Community Involvement

During the various consultation exercises hosted by UU, members of West Bradford Parish Council were keen to understand the extent to which UU would be willing to compensate local residents for any loss, inconvenience or damage suffered through no fault of their own at the hands of the developer. UU did not go into any detail about their willingness to support residents in this way moving forward, but did not rule this out.

It is disappointing to see that, although a Statement of Community Involvement (SCI) is attached to the planning application, this document describes in great detail the consultation methodology undertaken but does little to address residents' wider concerns. At page 44 comes the bland comment:

“We will look for opportunities to engage with and invest in the communities we are working within during the delivery of the programme of work. Our dedicated customer liaison team will be working closely with those communities to identify opportunities that meet local needs.”

The SCI goes on to refer to structural impact arising from vibration due to tunnel boring, and gives a commitment to “rectify the problem” in such instances. However, no mention is made of the impact which vibration arising from the movement of heavy goods vehicles passing through West Bradford village under Haulage Route Option 1 may have on local properties. Vibration damage is equally unacceptable whether arising from tunnel boring or heavy vehicle movement. Will a similar commitment be given to the residents of West Bradford who may be impacted in this way?

In members' view, UU' has failed to provide a positive Community Impact Statement addressing the need for a local compensation scheme should the impact of increased traffic flow on the village become disproportionate.

Local employment

The Parish Council has sought guarantees from UU that, wherever possible, local contractors should be used on the HARP project in order to ensure that any financial benefit arising from the development is spread as widely as possible. No such assurances have yet been given, but members would ask that the LPA consider whether this is an appropriate approach matter which they would encourage UU to pursue.

Summary / concluding remarks

Members of West Bradford Parish Council are clear and unanimous in their view that the LPA should adopt Haulage Route Option 2 as the preferred means of solving major traffic issues arising from the HARP project.

The Parish Council is disappointed to find no reference to a compensation scheme for the inconvenience and disruption that villagers may encounter through no fault of their own. Should the planning application be granted, members would wish UU to revisit this issue as a matter of priority.

West Bradford Parish Council has sought to engage with UU in constructive dialogue throughout the planning process to date, and will continue to do so moving forward. To that effect, should planning approval be granted, members would wish to have direct access to a responsible person within UU who can be contacted at short notice should traffic problems arise. It would be helpful if such arrangements / contact details could be included within any approved Traffic Management Plan.

The last date for submission of comments is 27 July 2021. Members would be grateful if the above comments could be considered when Planning Application 3/2021/0661 is determined.

Yours sincerely

Mr A Glover
Parish Clerk