

Development Management Group
Lancashire County Council
PO Box 100, County Hall
Pitt Street
Preston, PR1 0LD
By email: devcon@lancashire.gov.uk

10th January 2018

Dear Development Management Group,

1. I am writing on behalf of the Lancashire Branch of the Campaign to Protect Rural England concerning appeal ref: APP/Q2371/W/15/3134385.
2. CPRE Lancashire has considered the details of three routes proposed to provide access for HGVs between the A583 and A585 and the Roseacre Wood site, and associated information set out in the documents of the Traffic Consultation Report, Traffic Addendum and Traffic Management Plan.
3. We conclude that the proposals do not adequately resolve highway safety issues. The proposals raise further negative impacts with harm to rural character, hedgerows, tranquillity and local amenity, and consequently CPRE Lancashire recommends that the appeal by Cuadrilla against the Lancashire County Council decision to refuse planning consent be dismissed.

Highway Safety

4. It is clear highway safety is an important issue, yet the causes of accidents described in the Traffic Report Appendix-A Part 2 rather trivialises the causes of accidents. Serious accidents shown by yellow circles are obscured by green circles denoting minor accidents, thereby minimising the problem. Accidents have happened, and many more will happen if the proposals go ahead as suggested.
5. The data may reflect recorded incidents, but not all incidents will have been reported to the Police, Highway Agency, or Health and Safety Executive. Examples include, employees who may have had near misses in work owned vehicles, horse-riders intimidated by vehicles passing too near or too fast, wing mirrors hit by oncoming traffic, and pedestrians fearing for personal safety. The solutions offered by Cuadrilla do not properly resolve the highway safety issues. The current level of accidents although not negligible, is not a realistic

measure of risks that would arise from the proposals and new usage, which would be of an entirely different character and magnitude hitherto.

6. Who would count the movement of HGVs in and out of the site? We understand Cuadrilla have already breached some of the planning conditions associated with the operation of the Preston New Road, such as receiving deliveries of drilling rig equipment at unsocial hours, contrary to specified hours of operation. Here, planning permission was granted subject to conditions including a Traffic Management Plan, imposed after due process. The public is concerned about the apparent cavalier attitude of Cuadrilla to planning conditions, which erodes public trust in the enforcement of planning conditions. CPRE Lancashire calls for proper enforcement of planning conditions imposed on Cuadrilla by Lancashire County Council in the future. The fact is that Cuadrilla knew, or should have known, that objectors would continue to object to their work. Those objections are the exercise of the democratic right to do so, provided the objection is conducted lawfully. If there is unlawful conduct, it is for the Police to enforce the law. So to seek to vary the Traffic Management Plan conditions because of those objections is a manipulation of the planning process, and it begs the question whether future breaches to planning conditions relating to transport at Roseacre Wood occur if consented.

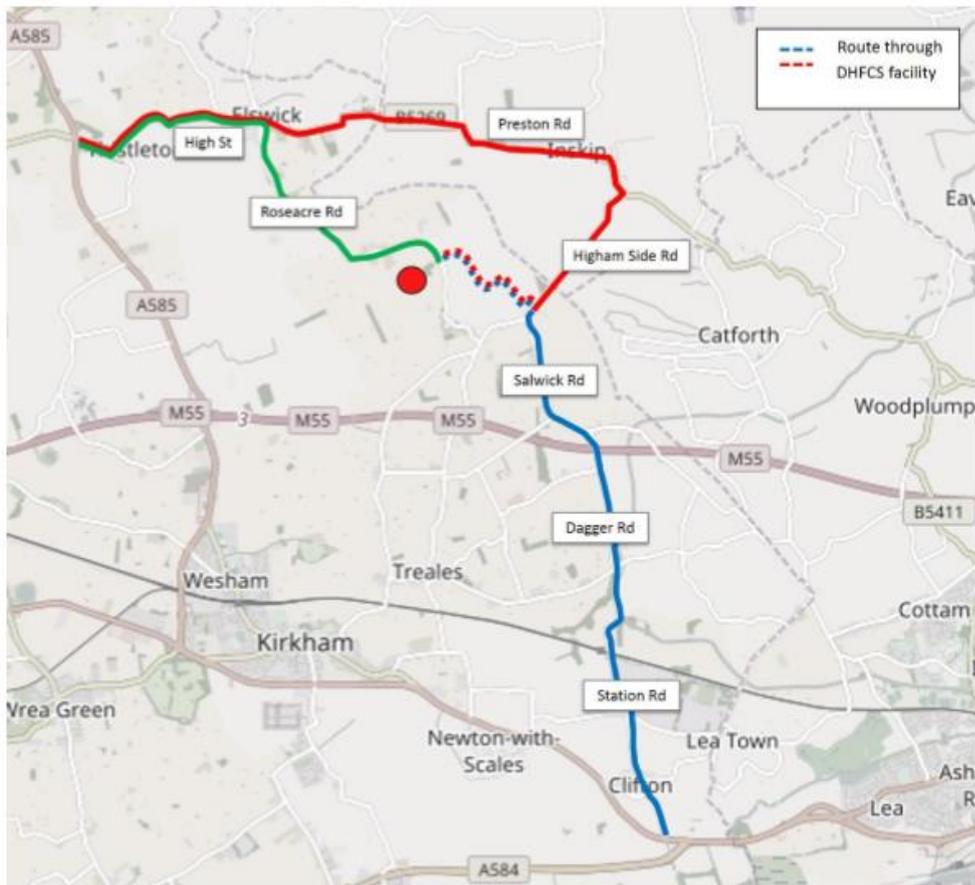
Excessive Flowback

7. CPRE Lancashire also queries the increase in traffic level in the probable event of an unexpected large flowback, as the tank storage on site is limited so round the clock emptying by HGV would be necessary. It is conceivable that the two tanks for flowback water and other storage will exceed capacity and that excessive waste water has to be trucked off site to a facility on the north east coast of England, at some distance. (N.B as an aside point, there is concern at the capacity of the treatment facility to receive the likely volumes of water, indeed the availability of HGV vehicles capable of handling the increased volumes). Each passing place can only accommodate one HGV vehicle, so what happens in the event of two trucks, three, four, five, six etc. To adequately dispose of waste water quickly enough trucks would have to be queued. What would happen in such an event? The proposals fail to cater for such a likely scenario.
8. CPRE Lancashire genuinely doubts the capability of such a complex logistical operation to be safely operated. Local people use the lanes of the green, red and blue routes (shown below) on a daily and weekly basis for walks and other forms of exercise, often with children and animals. The proposed additional traffic, pulling in and out of passing places, would substantially reduce the safety of users. For the most part there are no footways for considerable lengths due to the narrow nature of the carriageway.
9. As an example, take the Green Route, from A585 to the Site via B5269 Thistleton Road, Elswick High Street and Roseacre Road, where an additional 16 passing places, to the existing 5, will result in a stretch of 2.5 miles with a total of 21 passing places.
10. The Red Route, from A585 to the Site via B5269 Thistleton Road, Elswick High Street, Lodge Lane, Preston Road and Higham Side Road and through the Ministry of Defence's (MoD) Defence High Frequency Communications Site (DHFCS) Inskip facility, is hardly much better with 11 new passing places proposed. In addition, the installation of a convex mirror at a

bend on Preston Road may well help raise awareness of a concealed residential entrance, but we believe it to be unfit for the suggested purpose.

11. Finally, the Blue Route, from A583 to the Site via Clifton Lane, Station Road, Dagger Road, Salwick Road, Inskip Road and through the DHFCS facility, also includes 12 passing places and installation of traffic lights proposed on Dagger Road. We are concerned that the passing places will increase speeds as vehicles seek to avoid getting delayed by oncoming traffic. The traffic lights only cater for 3 HGVs + 2 cars (still not enough), but passing places cater for only 1 HGV (not nearly enough, what about local traffic). The Traffic Management Plan is terribly complex. CPRE Lancashire believes it is inconceivable that it could be implemented routinely. This is because it would require signalling of a standard found in railways, and as history shows, in the early days of railways, informal management resulted in many accidents because of human errors of omission.

Extract: Fig 1 Proposed HGV Routes



https://cuadrillaresources.com/wp-content/uploads/2017/11/Roseacre-Transport-Consultation-Report_Part1.pdf

Critical Swept Path

12. The computed swept path for HGVs negotiating sharp bends on the various routes are given in Appendix 18.2, as follows:

- No. 9 - Appendix D, Parts 1 and 3, Green Route,
- No. 10 - Appendix E, Part 1, Red Route,

- No. 11 - Appendix F, Part 1, Blue Route, and,
- No. 12 - Appendix G1, Rig Mobilisation.

13. They appear to show many swept paths are critically dependent on the path chosen as the vehicle approaches the bend. In practice, even skilled drivers will choose different initial approach paths so in reality, rather than one single critical path invariably being chosen, the paths actually followed will lie within an envelope. We ask that the sensitivity of the width of this envelope should be investigated so that the extent of the hazard involved in the negotiation of the bend can be properly assessed. It has been conceded that in some cases one or other of two vehicles approaching the same bend will have to give way. We believe that the outcome of the more thorough analysis we seek will indicate that, on a routine basis, the difficulties involved in negotiating many of these bends is too high for the risks involved to be at an acceptable level.
14. The User Manual for Savoy's Autotrack (much used in UK) states that the existence of a unique safe swept path for a vehicle should not be regarded as a safe design solution.

Speeding up traffic

15. CPRE Lancashire is concerned that the proposals will create a terribly frustrating travel experience. Local people in vehicles, and especially site operatives, including the HGV drivers servicing the site with fracking fluids, wastes and other associated freight, might well be tempted to speed up through the proposed chicane style layout to avoid being trapped in laybys and thus avoid delay. The proposals are likely to do the opposite of what they intend and result in higher vehicle speeds than are in safe limits. In reality, the proposals offer no real solution at all.
16. The solutions proposed for each coloured route are so very marginal that there is unlikely to be any real cumulative improvement to overall highway safety. Shale operation technology involves laterally drilling for many kilometres so why a more appropriate location on a more appropriate strategic highway cannot be identified is a mystery. The fact remains that the site is in the wrong location, remotely sited down nine miles of rural lanes that are simply not designed to cope with the type and volume of site traffic that is estimated to be generated.

Rural Character

17. CPRE Lancashire believes that the proposals will still significantly harm the rural lanes. Presently the lanes around the Roseacre site are predominately of rural character.
18. Fylde is a predominately rural area with agriculture and visitor sectors attributing major gross added value to the area. CPRE Lancashire is concerned about the impact on the rural character, and on the economic, social and environmental factors. See photo of the countryside near to the Roseacre Wood site below.
19. It would make more sense to utilise a brownfield site than unbuilt land for shale gas operations. The application is for exploration stage, and if viable it is likely the operator will wish to progress into full production. The intrusion of built forms and substantial traffic over many years will completely ruin the area's beloved rural character.

Photo 1.0 Rural character of Fylde near to the Roseacre Wood Site



Hedgerows

20. The lanes are lined by mature hedgerow (see Photo 2.0), much of which is probably considered significant, and therefore afforded protection under the Hedgerow 1997 Regulations. Hedgerows are a vital stitching in the patchwork quilt of the English countryside and CPRE has a longstanding interest in their protection and values their contribution to biodiversity, flood management and value to intrinsic rural character.
21. The passing places would undoubtedly involve the reduction, if not entire destruction of 1.3km of hedgerows (35 metre lengths x 39 passing places on green, red and blue routes) causing significant and substantial harm to local biodiversity (the area is renowned internationally for its birdlife) and other green infrastructure functions to the detriment of the area. The rural character will be harmed substantially by the intrusion of passing places, and the volumes of traffic the site would generate if permitted.

Tranquillity and Noise

22. Presently, the lanes convey light traffic usual for small hamlets and consequently they are relatively tranquil. CPRE is concerned that the tranquillity of the rural area is threatened by the substantial noise from the powerful engines and air-brakes of the many articulated lorries. This will be multiplied by trucks each time they slow down and then move away from passing places, especially in times of excessive flowback water (outlined above) and during fracking.
23. The proposals would significantly harm the tranquillity of the area. Paragraph 123 of the National Planning Policy Framework states that: "Planning policies and decisions should aim to:
 - avoid noise from giving rise to significant adverse impacts²⁷ on health and quality of life as a result of new development;

- mitigate and reduce to a minimum other adverse impacts²⁷ on health and quality of life arising from noise from new development, including through the use of conditions;
- recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established;²⁸ and
- identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.”
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²⁷ See *Explanatory Note to the Noise Policy Statement for England (DEFRA)*.

²⁸ Subject to the provisions of the *Environmental Protection Act 1990* and other relevant law.

24. CPRE is concerned that the substantial noise associated with the proposals will significantly harm the tranquillity of the countryside area against national and local planning policy.

25. In addition to noise, the signage clutter associated with the Traffic Management Plan would be totally insensitive to the open countryside (see example signage in Photo 3.0).

Photo 2.0 Hedgerows mark the field boundaries in this part of rural Fylde near to the Roseacre Wood Site and Photo 3.0 of typical Cuadrilla signage at Anna’s Road Site



Local Amenity

26. Roseacre is a pleasant place to live, and the easy access to the countryside lanes makes it so, therefore it is understandable that residents are worried about the harm to their local amenity from Cuadrilla’s ambitions. When our members visited the site, they encountered local people walking along the lanes. A proportion of these were parents/grandparents walking with children: younger ones in pushchairs, and older ones cycling/on scooters. Dog walkers, horse riders, and runners enjoying exercise along the lanes were observed. Due to the nature of the lanes there are no footways, so people use the carriageway.

27. The proposed passing places, and substantial increase in HGV traffic, will in our view ruin the present local amenity by entirely changing its nature; from a rural idyll to a busy industrial park, against all national and local planning policies. The landscape already has some minor intrusion from the equipment associated with the High Frequency Communications Site of the Ministry of Defence’s Inskip site. Further intrusions in this area of open countryside would cause a major and unacceptable cumulative impact.

In Summary

28. CPRE Lancashire is of the opinion that the proposals do not resolve highway safety concerns, in fact will cause significant and substantial harm to highway safety. Moreover, the proposals would cause further harm to the rural character, hedgerows, biodiversity, wildlife, tranquillity and local amenity on approach to the site. Therefore, CPRE Lancashire concludes with a recommendation that that the appeal should be dismissed.
29. The Roseacre site as previously concluded by Lancashire County Council officers and planning committee is simply the wrong location for the proposed development. The harm to the Fylde countryside would simply be too great, and issues are beyond mitigation measures to be satisfactorily resolved.
30. If you require any further information, please do not hesitate to contact me.

Yours sincerely,



Jackie Copley MRTPI MA BA(Hons) PgCert
Planning Manager

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Her Majesty the Queen
President
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