

Development Management Group,
Lancashire County Council,
PO Box 100, County Hall, Pitt Street, Preston

9 January 2018

Dear Mr. Haine

Appeal Reference: (APP/Q2371/W/15/3134385).

Re: PLANNING APPLICATION REF LCC/2014/0101 – HYDROCARBONS EXPLORATION SITE ON AGRICULTURAL LAND THAT FORMS PART OF ROSEACRE HALL TO THE WEST, NORTH AND EAST OF ROSEACRE WOOD AND LAND THAT FORMS PART OF THE DEFENCE HIGH FREQUENCY COMMUNICATIONS SITE BETWEEN ROSEACRE ROAD AND INSKIP ROAD, ROSEACRE AND WHARLES, LANCASHIRE.

The Roseacre Awareness Group submitted substantial evidence to the previous Inquiry into the proposed transport plan for the fracking site. We intend to present further evidence at the reopened Inquiry.

In our view the proposals should be refused on a number of grounds, but we understand that a key question at the reopened inquiry will relate to the transport proposals.

This response to the consultation by Cuadrilla on its new transport proposals, therefore, sets out the broad reasons we consider our objections on those grounds still hold, that is to say:

- a The applicant cannot identify a safe and suitable access route to the site (in line with NPPF Para 32).
- b The mitigation proposed by the applicant on the suggested routes (particularly the B-road sections) does not ensure they are safe and suitable.
- c The impact on local residents and users of those roads is, therefore, unacceptable and the proposal should be refused because the traffic impacts are severe.

The new transport proposals, reflected in the updated EIA, Transport Plan and Traffic Management Plan, has five substantive alterations:

- a The removal of the Broughton Route.
- b The insertion of two alternative (previously rejected) routes with passing places.
- c A commitment to avoid two HGVs travelling in the opposite direction at the same time (on uncontrolled public highways).
- d The addition of traffic lights on the Dagger Road section operated by the contractors' HGVs.
- e The introduction of contingency planning in 'exceptional circumstances' to deal with protests, including out of hours convoy operations (including at night).

Despite the assertion that these address the issues raised at the previous inquiry sessions, in our view, none of these changes affect our fundamental objection or provide mitigation to address the concerns that led to its refusal.

Instead their main practical result is to provide the applicant with additional flexibility of routing which impacts on communities previously not affected and creates substantial uncertainty about where and when HGVs will be routed during the busiest periods of operation.

As presented, the text suggests that the same, or similar, conditions would apply as at the previous inquiry. In particular it is implicit in the latest Transport Plans that there will be a maximum of 50 HGVs per day, but that there will be no limit on the use of any one route up to 50 HGVs. For example, it would be entirely within the stipulated proposals for all lorries to use the Blue Route, as originally proposed.

We also note stress is now being placed by the applicant on the prospect of disruptive protest. While this adds the potential of further inconvenience and risk to local residents, particularly the prospect of night time conveying, our objection remains that the routes are unsuitable in and of themselves for such HGVs. We note particularly that having introduced the potential for night time convoys none of the assessments within the consultation documentation has any regard to the impacts this would have on the villages affected, for example, by noise and light intrusion.

We lastly note that while our objection concentrates on the non-A-road routes the A585 and A583 have a number of accident clusters, which would suggest there may be concerns about encouraging additional HGVs on sections of these A-roads.

Yours sincerely