

Preston New Road Action Groups feedback on the Traffic Management Plan issue 11 - 26/06/2017

Thank you for the opportunity to comment on the amended Traffic Management Plan

These comments are made without prejudice to our contention that the grant of planning permission is unlawful which is a matter under litigation.

We do not think that the proposed changes should be approved, the reasons for this are as follows:

1. The current approved version of the plan states what actions should be taken if access to the site is obstructed in clear unambiguous language. The proposed revised paragraphs 3.7 and 3.7.1 will lead to confusion. Other road users expecting traffic to left in left out of the site will potentially be faced with large vehicles suddenly turning right into or out of the site potentially causing an accident.
2. It will be very difficult to ever prove that the TMP has been breached as it will just be stated that the plan was dynamically changed due to a risk without what that risk was in many cases being evident. This could also lead to far more traffic breaches being reported to LCC as people will just see a vehicle doing a right turn so assume that it is a breach of the TMP.
3. The previous version of para 3.7 gave specific details of what the drivers should do in the event of an obstruction including named waiting places, all this detail has been removed making this version of the document far less specific.
4. In para 3.7.one of the reasons given for changing from left in to right in, is 'Blocked entrance preventing a left turn into site. If the entrance is blocked I would have thought that access or egress would not be possible from left or right
5. The addition of para 3.7.1, seeking to allow HGVs to turn right into or out of the site is a hazard. There is a fundamental design flaw in the road layout around the site entrance. HGVs turning right take up nearly the full width of both carriageways when entering and leaving the site. This insufficient manoeuvring space in the eastbound lane for OGV2 and larger vehicles entering or leaving the site was entirely foreseeable. At the public inquiry it was raised that eastbound slip roads into and out of the site (effectively widening the eastbound lane) to allow space for OGV2 articulated HGVs to enter or leave the site safely without encroaching into the westbound traffic lane should be made. (copy of representation attached). In addition to the physical difficulties experienced by OGV2 articulated and larger HGVs by the tight turn into and out of the site the overall safety of all traffic is put at risk by the necessary low speed manoeuvring of HGVs and speed differential with other traffic around the site entrance.
6. Emphasis on a "dynamic risk assessment" is understandable, however the reasons for the decision to right turn must be recorded with full details of date/time, HGV type, classification, Police Officer collar number with signature to confirm the details recorded. It remains essential that Cuadrilla are required to keep meaningful records of right turns otherwise there is a real risk that they will become the norm. Furthermore records showing significant use of this "emergency" facility will provide evidence to further the case for eastbound slip roads.
7. The additional para 3.8 "Local Supply" may be confused to mean that local HGVs may access or egress the site by a right turn. It should be made clear that local HGVs should follow primary road routes until they can join the prescribed route, joining and leaving the site by the A583 eastbound lane making left turns only.

8. Many examples have been seen over the past few months of the TMP being dynamically changed and have shown that this approach causes disruption to other road users. On many occasions the traffic has been stopped and on some occasions the road closed without a risk or threat being apparent, if the vehicles had followed the normal TMP then there would have been no disruption to other road users. We have seen examples of convoys driving down the wrong side of the A583 which is not even an option covered by this revised plan in section 3.7.1. We have also seen escorted lorries overtaking queuing traffic.
9. Approval of this revised section 3.7.1 will allow the TMP to be changed without approval from LCC.

General Comments

1. The new 20 and 30 mph speed limits on the A583 are not always being adhered to by vehicles going to the site even when under police escort. This is a danger to other road users and pedestrians. All road users should be following the speed limits.
2. Currently much depends on police involvement, though there is no mention of them before para 3.7 (everything is the responsibility of the Site Management Team). How long will there be a police presence to supervise traffic movements in and out, and ensure safety for other road users? It is unlikely that the current police presence is sustainable for the duration of the exploration site which will mean that it becomes even more of a danger in the longer term.
3. There is a view that additional signage is required on the A583 to give more information and make it safer, some of the current temporary signs are often blown or knocked over. Could additional markings be put on the road to aid the passage of emergency vehicles ensuring that they have less hold ups?
4. The wheel cleaning solution that was agreed in the construction management plan does not seem to have been delivered. Is this going to be addressed?