



**National Highways Planning Response (NHPR 21-09)
Formal Recommendation to an Application for Planning Permission**

From: Alan Shepherd – Divisional Director
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To: Lancashire County Council FAO: Robert Hope

CC: transportplanning@dft.gov.uk
growthandplanning@nationalhighways.co.uk

Council's Reference: LCC/2021/0007

Location: Land north of the A674 Millennium Way, north east of M61 Junction 8

Proposal: Prior extraction of sand / gravel and subsequent restoration with inert engineering fill to facilitate a platform for employment development or agriculture with peripheral landscaping

National Highways Ref: 90555

Referring to the consultation on a planning application dated 16th February 2021 referenced above, in the vicinity of the M61 motorway that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- a) ~~offer no objection;~~
- b) ~~recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions);~~
- c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);
- d) ~~recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~

Highways Act Section 175B ~~is~~ / is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

¹ Where relevant, further information will be provided within Annex A.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

Signature: 	Date: 3 rd March 2022
Name: Warren Hilton	Position: Assistant Spatial Planner
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Annex A National Highway's assessment of the proposed development

NATIONAL HIGHWAYS ("we") has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

National Highways Comments on Proposal

The proposals are for the extraction of up to 300,000 tonnes of sand and gravel from agricultural land situated immediately adjacent to the eastbound M61 motorway and eastbound exit slip road for Junction 8. The site already has planning approval for B2 / B8 employment development and it is understood that the site is to be reinstated following operations with inert waste to either provide a level platform for this development or for it to be returned to agricultural use.

Having considered the supporting information with the application there are several areas of concern for National Highways where further detail and assessment work is needed from the applicant. These are described below:

Groundwater

It is stated that the ground water levels within the site are found at 4.5 metres depth, but that extraction of the sand and gravel will only be to 3.5 metres depth so as to preserve a 1 metre thick barrier layer to preserve the water table.

Further explanation and evidence is required to substantiate the claim regarding the 4.5 metre depth of the water table. This does not appear plausible given that the site is described to be underlain at shallow depth by sands (a permeable material) and is crossed by open ditches which are perhaps less than 1 metre deep. We therefore suggest that groundwater monitoring stations be installed and monitored over a period of time to check whether this is actually correct. Indeed, the exploratory hole records for the trial pits excavated across the site are not provided with the Supporting Statement and it is possible therefore that they do not reflect seasonal variations in the height of the table.

If groundwater monitoring reveals that groundwater control will be needed for the proposed sand and gravel extraction works, details of this will be needed; in particular to show how ground loss which could cause settlement to adjacent assets (including the M61 motorway) will be prevented.

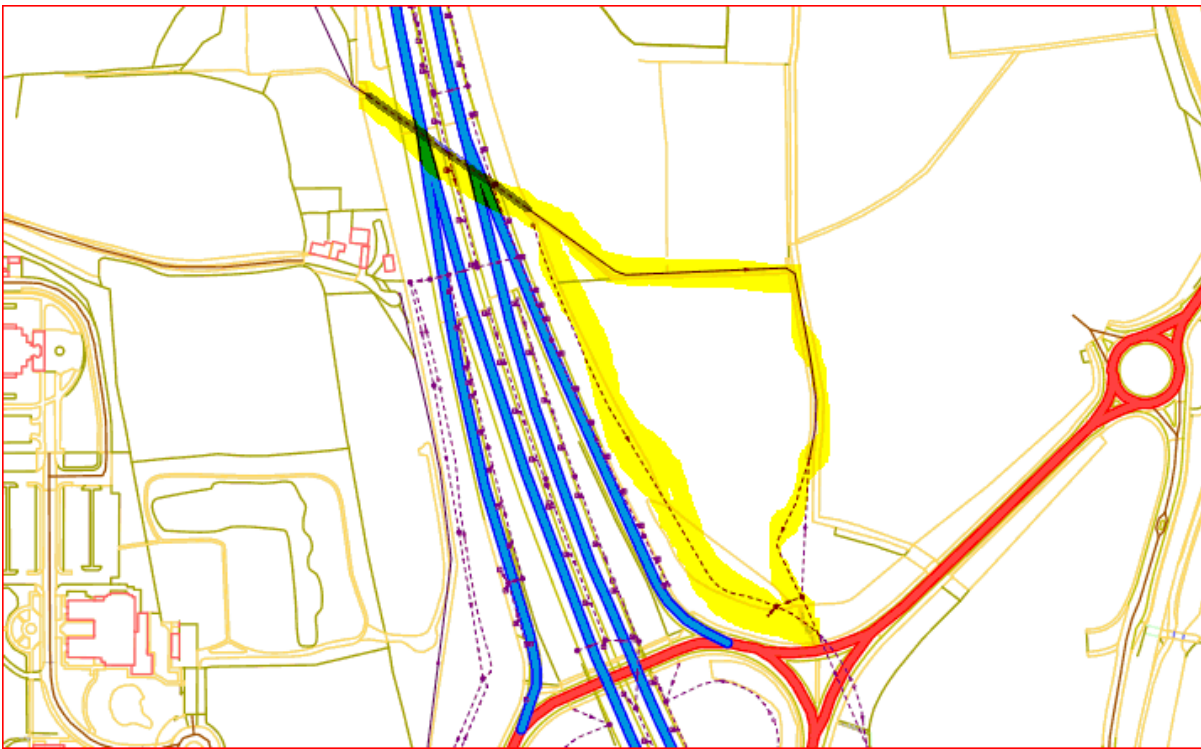
Although not an issue for National Highways, we do wish to point out to the County Council that in terms of the eventual site restoration, the uppermost layers will consist of inert fill, which suggests (but doesn't say) that lower layers may not be inert fill. Considering the sands and gravels and proximity of the ground water table here, this could result in the pollution of the water table.

Ground Drainage and Channels

The Gale Moss area of peat borders the northern boundary of the planned excavation area and is separated by a ditch. The excavation, and the proposed diversions of the drainage channels through the site, may alter ground and surface water flows both towards and from the peat deposits resulting in volume changes in the peat layer which could cause long-term ground settlement that could in turn affect the motorway. The report makes a reference to a minimum of 10 metre stand-off from the peat area during the operations, but no further details are given – **further information should therefore be provided.**

Overall, further groundwater monitoring and assessment are needed regarding how ground and surface water flows will be managed to mitigate impacts on the peat deposits. Indeed, the ecological appraisal report included in the document also makes a reference to the requirements to mitigate any draw down of the water table in the peat deposits to reduce the risk to the area.

A motorway filter drain runs along the motorway boundary with this site at the foot of the motorway embankment., as shown in the drawing below. **Again, there will need to be a level of standoff agreed with National Highways from the excavation to ensure that this drain is not disturbed.**



Of note however is that there is a 1200mm diameter culvert that crosses under the M61 north of Junction 8 that discharges into one of the drainage ditches that crosses the excavation area. It would appear from the Supporting Statement that these drainage ditches downstream are to be diverted as part of the mineral extraction operations, **but the plans are not clear as to their new location, and so confirmation of their new location is needed along with a longitudinal profile to demonstrate that there is still sufficient a**

fall to ensure that there will be no risk to the motorway culvert. A maintenance regime for this channel should also be provided.

Turning to the phasing of the operations, we note that the intention is to work the site from east to west in these phases, with the final phase therefore being nearest to the motorway, which is when surface water within the site operations will be closest to the motorway. It is indicated within the Supporting Statement surface water (and potentially flash flooding) is to be managed by pumping and surface water prior to discharge to the Sand and Gravel utilising a moving sump. **However, no mention is made about what form the storage will take or where it will be sited in each phase – additional detail here is therefore needed about this.**

Slope Stability

As indicated above, the site operations will be taking place alongside the M61 motorway. The motorway runs upon an embankment and is therefore at a higher level than that of the site itself, which for a period would become lower during the period of excavation.

It is proposed that a bund of earth would be established along the boundary with the motorway. However, **no drawings of detailed profiles of the proposed earth bund have been provided with the application. Also, there is no slope analysis within the supporting information.** Therefore, it is not known how the motorway drainage would be protected or what the impact upon the stability of the motorway embankment that these adjoining operations would have. **Further details of this are required from the applicant, which should include a full slope analysis in accordance with the mandatory standard CD622 ‘Managing geotechnical risk’ of the Design Manual for Roads and Bridges. The slope analyses need to be extended to include other partial factor sets as noted in Eurocode 7: Geotechnical Design and its National Annex to ensure that the appropriate ‘worst case’ limit state can be understood and prevented. The M61 embankments need to be included within the analysis / mitigation.**

Impacts on Traffic

It is noted that the Supporting Statement claims that HGV vehicle movements from the site should be limited to 50 two-way movements per day. However, there is no transport assessment with the application. **In consideration of the site’s location next to the motorway junction, details should be provided (based on named site operations of the same nature in other areas) to set out what the number total vehicle movements would be at this site (i.e. not just HGV) and what they would also be during peak periods.**

The Supporting Statement also indicates that dust levels within the site will be monitored and contains a Dust Mitigation Strategy (Chapter 5). Paragraph 5.3.4 of this indicates that suspension of site operations is a possible tool to be used if, in the opinion of the site manager, the level of dust is unacceptable. However, **no mention is made of what the actual monitoring regime is and whether this monitoring shall also include visible dust being blown onto the motorway. This should be clarified.**

National Highways comments on amended information – September 2022

Traffic Impacts

We note the inclusion of a revised Transport Statement (TS) by Callidus within the revised Supporting Statement.

The TS does not contain an assessment of the operation of M61 Junction 8 and is based on a traffic survey of the A674 past the site entrance in May 2021, when many COVID pandemic-related restrictions remained in place, including 'work from home' guidance. National Highways does not accept the use of traffic data gathered after February 2020 and before September 2022. National Highways also does not also accept the stated trip distribution of 33% A674 east, 33% M61 south and 33% M61 north, though we also accept that this is difficult to predict.

In this case, the total number of HGV daily operating trip movements over the operational hours of 07:00 to 18:00 is said to be 50 two-way (i.e. 25 in and 25 out) plus another 16 two-way daily movements for site staff, so a total of 66 daily vehicle movements (8 and 6 during the AM and PM peak periods respectively). Assuming 100% of this traffic utilised the M61 and Junction 8, National Highways is of the view that this unlikely to have a material traffic impact upon the operation of the SRN.

We therefore recommend that the suggested daily HGV trip movements cap of 50 (as stated in paragraph 3.5.1 of the Supporting Statement).

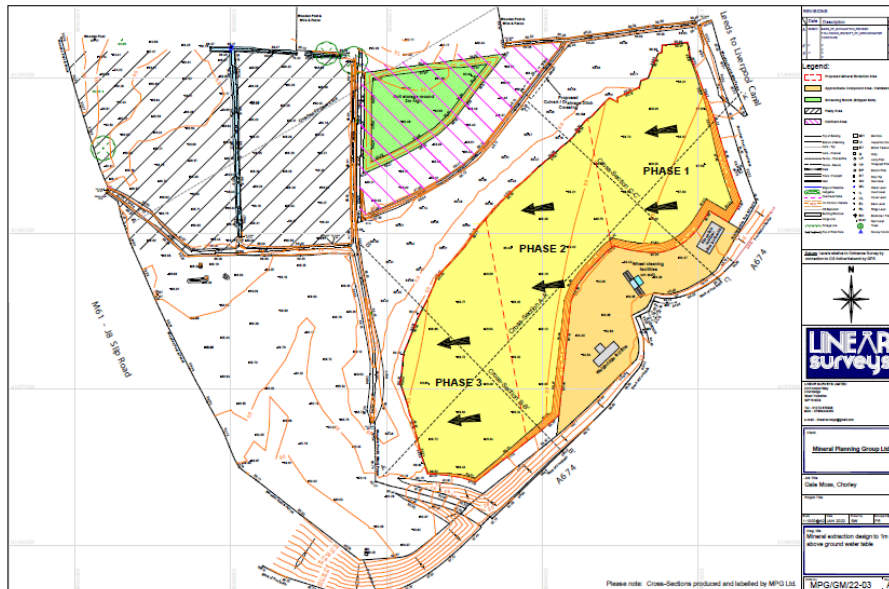
Geotechnical and Drainage

We have considered the updated supporting information dated September 2022 and make the following comments:

- Drawing reference MPG/GM/22-03, submitted with the planning application originally, shows the extent of mineral extraction across the site. This drawing, which is also included in the Analysis of Slope Stability and the Supporting Statement, shows the proposed extraction is well away from the M61.

However, other drawings included as part of the Plan submission such as MPG/GM/DEC20-04 and MPG/GM/DEC20-01 (attached for ease of reference) show the excavations to extend close to the M61 boundary.

Lancashire County Council (as the planning authority) have since confirmed to us that the physical extent of the development has been reduced from that proposed with the application originally, and is that shown in drawing reference MPG/GM/22-03 Rev A (extract copied below)



As no mineral extraction work will not be taking place close to the motorway boundary, we are satisfied that there is no need for any slope stability analysis.

- The geological map of the area shows peat deposits extending into the western parts of the site, close to the M61. Only four boreholes located at different parts of the site have been carried out. Although none of the boreholes identified any peat, this is not considered to be sufficient evidence of peat being absent in the western parts of the site.

Records of previously completed trial pits have again been referenced in the supporting documentation, but do not appear to have been included anywhere in the supporting information, which we would be grateful if could be clarified / addressed. Risks associated with excavation in peat and its impact on our assets are not therefore considered to be adequately addressed.

- The supporting documentation, including the Hydrological Impact Assessment, refer to limiting excavations to 1 metre above the groundwater table. It is not clear how the proposed 1 metre standoff above the groundwater table is to be achieved given that the groundwater monitoring data presented in the Hydrological Impact Assessment suggest that the groundwater table across the site varies between approximately 1.2 and 3.3 metres below ground level, with the groundwater table nearest to the motorway at around 1 to 2 metres below existing ground level. The proposed depth of excavation is 3.5 metres below ground level and so would likely hit the water table.
- The 10 metre standoff from the limits of extraction to all watercourses, referenced in the Hydrological Impact Assessment, is unlikely to be achieved if excavations are to extend to the proximity of the M61 as shown in the drawing MPG/GM/DEC20-04, impacting the existing drains.

National Highways conclusion and formal recommendation

Our consideration of this application has found that further information is required to enable National Highways to provide a final view on this proposal.

Consequently, and to allow time for this to happen, National Highways formally recommends to Lancashire County Council that this application is not determined until at least 1st September 2023. Should National Highways be able to form a final view on the application before this date, the hold on its determination may be lifted sooner.

This response represents our formal recommendations with regard to this application and has been prepared by Warren Hilton.