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**Submitted via NSIP Consultation Portal**

**Your ref:** TR010062

**Date:** 16-MAY-2023

Dear Sir/Madam

**A66 Northern Trans-Pennine Project Planning Inspectorate Reference: TR010062  
Deadline 8 – Response of United Utilities Water Limited**

Further to our letter sent to the Examining Authority on 25<sup>th</sup> April 2023 [REP7-207], which outlined our concerns with DC-05 change request to the access to our wastewater treatment works at Penrith (Scheme 0405), United Utilities Water Limited ('United Utilities') wishes to provide further comment in respect of Deadline 8.

We have now met with the Applicant to discuss the proposed access changes. These meetings occurred on 21<sup>st</sup> April and 4<sup>th</sup> May. We have also now met with their Principal Contractor on 9<sup>th</sup> May. Subsequent to this latest meeting, we received more detailed information on the afternoon of 10<sup>th</sup> May to better illustrate the changes that are proposed to our access arrangements.

Prior to receiving this information, we only had sight of very basic information from the Applicant's consultation brochure in February 2023 to illustrate the changes to our proposed access arrangements. As a result, we are now in the process of reviewing this information in detail with our advising highways consultants.

From our initial review of information, our concerns that require further consideration include (amongst others):

- Concerns with the proposed passing bay arrangements both in terms of the location and number;
- Concerns over whether the access is designed for large enough vehicles bearing in mind recent legislative changes which will allow HGVs to be greater than 16.5m in length;
- Concerns with the weight allowances in the design of the access arrangements, especially in terms of the bridge design and the measures for protection of existing services crossed by the access;
- Concerns with access arrangements for future construction traffic associated with future capital investment at Penrith Wastewater Treatment Works. This is on the basis that our draft investment plan, which we are in the process of preparing, currently proposes a significant capital project at the wastewater treatment works as part of the Water Industry National Environment

Programme (WINEP) with a significant risk that the two construction projects could align which would need to be carefully considered and managed to facilitate construction activities and normal operation of our treatment works. This would include heavy plant and could include abnormal loads and therefore access to the treatment works for these types of vehicles needs to be accommodated in the detailed design;

- Arrangements to access the treatment works in any emergency. For example, we are concerned at the arrangements for accessing the treatment works in the event of a tanker breaking down on a single track access road;
- Future arrangements for classification of the access track for management and maintenance of the proposed access including a winter gritting service which will be essential to ensure that our HGV tankers can safely access the site during all weather conditions;
- Clarity on the rights that are afforded to other users of the access (vehicular, cyclist and pedestrian);
- Safety concerns over whether there is adequate segregation between users e.g. pedestrian / cyclist and our operational traffic. In this regard, we note that there is no intention to illuminate or positively drain the road which will increase the risk of hazards to our operational traffic and any other road users; and
- Concerns over the potential for other users to cross our access road and what controls will be in place to manage this?

Therefore at the current time we maintain a position of **OBJECTION** to the proposed changes to the access to Penrith Wastewater Treatment Works. However, we may be able to remove this objection if the Applicant enters into a separate Side Agreement, expanding on the Protective Provisions. The Side Agreement will need to address our concerns including the above bulleted list of requirements that the detailed design must take into account, with approval of United Utilities throughout the iterative design process.

If you have any queries regarding this matter, please do not hesitate to contact Adam Brennan at [REDACTED].

Yours faithfully

Adam Brennan  
Planning, Landscape and Ecology  
United Utilities Water Limited