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CS

Mr C Sharpe
Ribble Valley Borough Council
Council Offices
Church Walk
Clitheroe
Lancashire
BB7 2RA

Our ref: NO/2012/103956/01-L01
Your ref: 3/2012/0524
Date: 26 July 2012

Dear Sir

BANK PROTECTION/STABILISATION WORKS CONSISTING OF ROCK ARMOR WALLS, RIP RAP AND REGRADED BANK AND IMPROVED TEMPORARY CONSTRUCTION ACCESS JUNCTION HOLDEN WWTW, BOLTON BY BOWLAND ROAD, HOLDEN BB7 4NL

Thank you for consulting with us on the above application which we received on the 25 June 2012.

We have considered the above proposal and the revised plan Ref: TS928 Proposed Site Plan 03 Rev E and can comment as follows:

We **object** to the proposed development as submitted because the revised plan Ref: TS928 Proposed Site Plan 03 Rev E (2) and the risk posed to nature conservation are inadequate.

We therefore recommend that the planning application is refused. We will maintain our objection until the applicant has supplied information to demonstrate that the risks posed by the development can be satisfactorily addressed.

We wish to be consulted on the results of any survey submitted in connection with this application, on any design changes, additional mitigation, compensation or enhancement measures that might subsequently be proposed.

Reasons

Government policy on minimising impacts on biodiversity set out in the National Planning Policy Framework (NPPF) paragraph 118, requires local planning authorities to aim to conserve and enhance biodiversity when determining planning applications. This has not been demonstrated in the present application.

The revised plans submitted with the application are inadequate and do not properly address the risks. In particular, the proposals do not:

Reflect what was agreed on site between ourselves and United Utilities on Wednesday 18th

July 2012. The line of the proposed revetment wall is now not as straight as the original plan but does not follow the curve of the bank as closely as was agreed on site and makes too much of a pinch point against the gravel bar feature.

Overcoming our objection

A revised plan needs to be submitted to the Local Planning Authority, the plan should show the revetment wall following the current alignment of the channel. Furthermore, the annotated comments regarding the remodelling of the stone area need to be removed.

This gravel bar opposite the eroded bank is now to stay in place, with only the top dry section of the bar removed to 6 inches above normal water level. This will allow the potential spawning gravel to stabilize at the tail of the pool and allow peak flows to go over the bar feature.

Prior to the works commencing, we are happy to meet with United Utilites and/or their contractors on site to specify and agree the stake out points of the new bank protection.

Potential future condition

Should the above objection be overcome would wish to see the following survey undertaken prior to work commencing, we would be requesting this as part of a condition on any future planning permission granted.

A crayfish survey needs to be undertaken by a suitably qualified ecologist prior to the works commencing. The optimum time for crayfish surveys is July to Sept. A fish rescue also needs to be undertaken prior to the works commencing. We can supply a list of approved contractors upon request.

The applicant should be made aware that no in channel works can take place from October to March inclusive for salmonid rivers.

They should also be aware that the invasive plant Himalayan Balsam (*Impatiens glandulifera*) has been recorded on site. This species is listed on Schedule 9 of the Wildlife & Countryside Act 1981 (as amended) making it an offence to plant, or otherwise cause this plant to spread, in the wild.

Yours faithfully

Miss Jilly Dixon
Planning Officer - Sustainable Places

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