



RIBBLE RIVERS TRUST

c/o Hanson Cement Ltd, Ribblesdale Works, Clitheroe, Lancashire, BB7 4QF

Tel. 01200 444452 E-mail. admin@ribbletrust.com

www.ribbletrust.org.uk

Sarah Westwood,
Ribble Valley Borough Council,
Council Offices,
Church walk,
Clitheroe,
Lancashire,
BB7 2RA.

25 MAR 2014

24th March 2014.

SUBJECT: Planning Application No. 3/2014/0183

Dear Sarah,

Thank you for asking us for our comments with regard the planning application for Kirk Mill (number cited above).

This is a comprehensive and extensive application, and as such we have focused our comments on areas in which we feel we are appropriately qualified and experienced to provide input.

The Ecological survey of the brook is far from comprehensive. It is clear that the consultants employed have not undertaken as detailed a survey of the brook as they have other habitat types. As such we feel that there is insufficient data for them to consider the responses to riverine species and habitat to the development.

No reference to the various biotopes or sub habitat types was made, i.e. pools, riffles runs. Nor was there any reference to the many weirs within the brook. Including the one which provides water to the pond feature. Several years ago we undertook works to make this weir more passable to fish, specifically, trout, salmon and eels.

Although they refer to gaining data from LERN, and EA (fish), they made no reference to finding out about otter and water vole species from these sources. Chipping Brook is not somewhere that is likely to have otters present throughout the year, however we have found otters within the Hodder catchment, and not far (relative to an otters range) from the development site, and would expect that they utilize the brook when fish populations are more abundant, and as such they will have resting places and holts along the brook. The derelict mill provides many suitable locations for resting places and holts. We would have suggested that several survey dates were used, and that they ensured there had been no high water events in the week preceding the survey (this is not mentioned within the report).

The invertebrate element of the report made no mention of invertebrates within Chipping brook, which contain many locally important species.

TRUSTEES: D. Bradley, V. Edmondson, Dr. M.W. Horner, C. T. Haworth, J.P. Lord (Chairman), C.H. Marchbank, A.T. Rowntree, D. Wilmot

CHARITY NUMBER 1070672 COMPANY NUMBER 3498691 ENTRUST REGISTRATION NUMBER 603122

To secure the conservation, protection, rehabilitation and improvement of our rivers, streams, watercourses, water impoundments, bank sides, tributaries and estuaries in particular of the river Ribble, Calder and Hodder for the benefit of the public.

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When reading their comments with regard habitat assessment, 5.2.7 states that standard engineering practice in respect of pollution control will negate any adverse impacts on the Chipping Brook". Unfortunately many of the developments within the borough have resulted in pollution events that we have notified the Environment Agency of, we do not feel that such "Standard engineering practice" is sufficiently being employed by firms, or regulated. As such we would recommend that given Chipping Brooks local importance that enhanced standards will regard to pollution control were employed.

We are pleased that they encourage the control of Himalayan Balsam, as we are currently running a program of Balsam control across the Ribble, and at present little activity is being undertaken on the Brook. We can provide advice, and extent of the problem, and encourage the developer to contact us to ensure that strategic works are delivered.

With regard the developments impact on the water environment, little mention is made of light pollution, vibration, or general activity. Many riverine species, are sensitive to light, particularly at night, and as such there may be significant impacts of the development as the illuminate the venue during the evening. Additionally vibration that may be considered insignificant to humans, will have impacts of riverine species. This is not recognized within the report. For Salmon, Trout and Eels, migration is an essential element of their lifecycle, and there is much scientific literature that sets out how their migration behavior is changed and negatively affected by light, so the comment 5.3.37 is incorrect.

We feel more mitigation is require to offset these issues, such as adding mitigations measure to sections of the brook most at risk (canalized section running through the middle of the site) to provide more/better habitat.

A buffer zone of 4 metres is referred to, that may aid in mitigating in the above but this does not seem founded on any specific evidence or guidance. Nor does it make reference to how this will be employed in the areas within the main mill complex that are currently concrete wall lined, without this correctly delivered the buffer will provide reduced benefit, if any.

Furthermore with the additional use of the sites, there will be greater vehicular traffic, leading to increased amounts of residual substances deposited on roads and parking areas, this when it rains will cause a negative impact on water quality. As such we feel that Sustainable Urban Drainage Systems (SUDS) should have been included as a mitigation measure for increased pollution issues associated with the development, and strongly encourage a condition to be included for the creation of several SUDS.

SUDS should also be used to reduce the likely increase in flood risk associated with the development, from greater amounts of hard surface causing faster run off.

We note from the "Master Plan" document that the area to the North West of the main development is ear marked for riverside walk and allotments. We encourage the engagement of the public with rivers, and as such provision of a riverside walks is commendable. However converting this area to allotments is potentially damaging to the brook, and to the surrounding ecology. We would not wish to see this valuable wet woodland (a priority habitat) damaged. Allotment provision should be elsewhere.

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We also note from their website reference to a "Hydro Scheme". Note that this is not part of this application but is being pursued. We are concerned that if implemented incorrectly, that the development would cause significant damage to Chipping brook, due to abstraction reducing the amount of water and thus habitat within the stream, but also by affecting the ability of fish species to migrate. Alternative renewable energy activities should be explored.

In conclusion we object to this planning application on the basis of insufficient consideration to the riverine environment, specifically lacking in understanding of the impacts on the brook, but also a failure to implement sufficient mitigation measures. We do not feel that the application satisfies policies ENV7, 12, 13, 24 or 25.

Yours Sincerely



Jack Spees
Trust Director
Ribble Rivers Trust

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