

FAO John Macholc

I refer to the applications for EIA Scoping opinions in relation to the proposed Haweswater Aqueduct refurbishment .

The following comments are from the Planning and Environment division of the County Council.

Archaeology

The Screening Report states that the proposed Environmental Statement will contain a chapter on Cultural Heritage, and some baseline data has been acquired from the Lancashire Historic Environment Record in the compilation of the Screening Report. The need for further Desk-Based Assessment (enhanced by means of a walkover survey of those parts where groundworks will be required) is one that has already been agreed in discussions with the Historic Environment Team earlier in 2019. The proposed methodology, whereby each stage of archaeological work (desk-based assessment, geophysical survey, intrusive archaeological evaluation) is intended to inform the next is one that the Historic Environment Team would endorse but there are some areas where the methodology is considered lacking:

Paragraph 400) is a bit light on the extent of the background research to be undertaken. To all extents and purposes the work proposed has already been undertaken, bar the walkover survey, for the production of the Scoping Report. The Design Manual for Roads and Bridges, Sustainability & Environment Appraisal, LA106 Cultural Heritage Assessment, suggests a number of other sources that might be consulted:

"3.9.1 In addition to national registers and local cultural heritage records, historical maps and aerial photographs, relevant books, journals, previous reports, LiDAR and geotechnical data may be consulted."

Without the consultation of the sources mentioned above, the desk-based assessment will merely be a rehash of the information held in the Historic Environment Record and will prove to have no added value in assessing the potential adverse impacts of the proposed development. A statement to the effect that the above sources will be consulted, or a reference to this part of the Manual being followed, is therefore considered necessary.

In addition we would wish to see it stated that:

Project Designs/Written Schemes of Investigation will be prepared, and agreed with the local authority archaeological advisors, for each phase of works,
Draft reports for each phase of work will be submitted to the local authority advisors for comment.

Waste

The Environmental Statement should include information on how waste from the project will be managed (paragraph 5 c of schedule 4 to the EIA Regulations) including the materials arising from the tunnelling operations. The applicant should note that disposal of any waste materials arising from the tunnelling operations may require a separate planning permission from the County Council unless such materials are to be deposited in existing landfill facilities.

Public rights of Way

The applicant should note that any applications for the temporary diversion of public rights of way should be made to the County Council prior to any works commencing on site.

I would be grateful if you could incorporate these comments into the Borough Council's Scoping Opinions for this project.

Yours sincerely

Jonathan Haine

Jonathan Haine
Team Leader Development Management
Planning and Environment Service
Lancashire County Council
PO Box 100
County Hall
Preston
PR1 0LD

Tel : 01772 534130

Mobile: 07887 831159

Email : jonathan.haine@lancashire.gov.uk