

Landscape Response to EIA Scoping Request

**Ribble Valley Borough Council Planning
Application No. 3/2021/0174
Application No. 3/2021/0119**

**Addendum to EIA Scoping request for the installation of tunnelled pipework at
the Bowland and Marl Hill Sections of the Haweswater Aqueduct and
associated works**

**Construction site A adjacent New Laithe Farm, Slaidburn Road, Newton, BB7
3DL.**

**Construction site B adjacent Booker Farm, Slaidburn Road, Waddington, BB7
3JJ.**

**Construction site D adjacent Burnside Farm, Back Lane, Slaidburn, BB7 3AJ
Construction site E adjacent Fober Farm, Dunsop Road, Newton, BB7 3ED**

**Steven Brereton BA Hons, Dip LA, CMLI
Senior Landscape Architect
Environment Team
Design and Construction Service
Lancashire County Council**

On Behalf of Forest of Bowland AONB

25th February 2021

On behalf of the Forest of Bowland Area of Outstanding Natural Beauty Joint Advisory Committee (JAC) I have reviewed United Utilities ***Haweswater Aqueduct Resilience Programme, HARP Proposed Bowland Section EIA Scoping Report Addendum, February 2021*** with particular reference to landscape and visual resources.

This report details the findings of my review and as such responds to the request for comments from Ribble Valley Borough Council in relation to the scoping opinion as required under section 15 (4) of the Town and Country Planning (EIA) Regulations 2017.

In reviewing my comments below, reference should be made to the comments in my ***Landscape Response to EIA Scoping Request, Ribble Valley Borough Council Planning Application, 3/2019/0981, 27th November 2019*** document. These comments were made with reference to United Utilities ***Haweswater Aqueduct Resilience Programme Proposed Marl Hill Section - EIA Scoping Report, October 2019***. The comments I made in sections 1. Legislation and Planning Policy, 2. Area of Outstanding Natural Beauty, 4. Consultees, 5. Data search, 6. Good Practice Guidance and 8. Detailed Aspects of the Proposed Haweswater Aqueduct Scheme of my report are equally applicable for Planning Applications 3/2021/0174 and 3/2021/0119 which are the subject of this report.

In addition to the proposed measures stated within the original scoping report and subsequent addendum, it needs to be ensured that all of the matters discussed below (and those in my original scoping response) are fully addressed within each Environmental Statement (ES) for the proposed development.

1. Design Changes to the Proposed Bowland Section

Since United Utilities submitted their scoping report in October 2019 detailing their preferred solution - Option 4B - they have further developed their design solution and it is this which is the subject of their February 2021 scoping request report. ***Table 1: Comparison of Proposed Bowland Section features described in the 2019 and 2021 reports*** of the February 2021 report summarises the changes which United Utilities have made to their design solution. The landscape and visual implications of these changes are reviewed in outline only below (a full detailed assessment will be undertaken when the Environmental Statements are available):

a) Reduction in the scope of works described in the 2019 Scoping Report

Construction Areas B, C and D are no longer part of the proposals, Construction Area A (Lower Houses Compound) will be reduced in area to 10.82 ha, Construction Area E (Newton-in-Bowland Compound) will be reduced in area to 23.94 ha and a water discharge pipe serving the new aqueduct has been removed. In landscape and visual terms, these are positive outcomes for the HARP scheme which will contribute towards reducing some of its likely temporary and residual effects on the nationally important landscape of the Forest of Bowland AONB.

b) Additional Elements not presented in the 2019 Scoping Report

Table 1 lists new design elements for the HARP scheme not presented in the applicant's 2019 Scoping Report that will affect 68.83 ha of predominantly agricultural land. Where applicable and within the constraints imposed by the unavailability of the applicant's landscape and visual impact assessment, I have reviewed the salient landscape and visual issues that would likely arise from these new design elements and provide my initial thoughts on them below:

- **Wray Satellite Compound (within the Forest of Bowland AONB)**

This proposed compound would serve as a park and ride facility for contractors' private cars and vans and, be used infrequently as an exceptional load marshalling area. The chosen site lies within the Forest of Bowland Area of Outstanding Natural Beauty, is just 0.4km from Hornby Conservation Area and also lies within an area which forms part of the setting to listed buildings. The site is comprised of open pasture partly bounded by hedgerows. The topography within the site gently undulates but there is insufficient variation in elevation to provide significant mitigation of the development's likely landscape and visual impacts. Similarly, the existing site boundary hedgerows - there are no copses or areas of woodland within – could have only limited filtering of views of the proposed compounds from surrounding public rights of way, residences and roads. Moor Lane to the south rises upwards quite quickly providing extensive views across the proposed compound site. It should also be noted that there are no features similar to those proposed within the compound in the vicinity - the character is overwhelmingly rural. For all these reasons, I have reservations regarding the choice of this site for a compound and load marshalling area.

- **Temporary residents' parking, Wray**

No comment

- **Hodder Crossing (within the Forest of Bowland AONB)**

This would be a major new built feature in the Forest of Bowland AONB landscape being comprised of substantial civil engineering structures including 1,450m length of temporary haul route, an approximately 70 m clear span bridge over the River Hodder, three 35 m spans across the floodplain, and a highways standard road up to the Newton-in-Bowland compound. Given the scale of these structures and desired 'highway standard' of the new road (making its adoption as a county highway straightforward) ensuring that they are in keeping with the character of the landscape, reflecting local distinctiveness, vernacular style, scale, style, features and building materials will be very challenging. The proposed clear span of the new bridge for example is considerably longer than that of the nearby Grade II listed historic Newton Bridge and due to the length of span required it seems likely that the bridge would have to be constructed from incongruous looking concrete beams. Whilst the report describes the construction access as a "*temporary*" feature, due to the *significant* cost involved, scale of the structures proposed, the highways standard of construction and the road's potential for reducing traffic volumes in Newton, their removal may be deferred and, ultimately, not happen effectively creating a permanent 'bypass' - something which has no policy basis or justification as it is not in Ribbles Valley's **Districtwide Local Plan** or **Adopted Core Strategy**. Creation of a Newton Bypass would also be

in conflict with other Ribble Valley planning policies particularly ENV1 of the ***Districtwide Local Plan*** which states, "*protection, conservation and enhancement of the natural environment will be the most important* [my emphasis] *considerations in the assessment of any development proposal.*" and Key Statement EN2: LANDSCAPE of the ***Adopted Core Strategy*** which requires any development within the Forest of Bowland AONB "*to contribute to the conservation of the natural beauty of the area.*"

To achieve certainty regarding removal of the temporary construction access features, if the determining authority is minded to approve the application, consideration should be given to ensuring that it is conditional upon full removal details, timescales, remediation works, completion date, etc. being provided and agreed.

The site selected for the proposed construction lies within an area that forms part of the setting to Newton Conservation Area, numerous listed buildings and the historic Newton Bridge. The site is mostly comprised of pasture with the field boundaries often lined with trees and hedgerows some of which would likely have to be removed to make way for the proposed structures. This boundary vegetation could provide some mitigation of the effects of the proposals on views but as the site rises towards the Dunsop Bridge road and there are no copses or areas of woodland within it the overall mitigating effect on views from the surrounds would be limited. Intervisibility between the site and the surroundings is high due to its location within the base of the Hodder Valley the sides of which rise quite steeply over a relatively short distance. The valley is also crisscrossed by a network of public rights of way which afford good visibility of the site. For all these reasons, I have reservations regarding the choice of this site for a construction access and am concerned that once constructed, it would appear as a scar in the landscape that failed to protect, conserve or enhance the nationally important Forest of Bowland AONB landscape and character.

- **Clitheroe Park and Ride**

No comment.

- **Clitheroe HGV Holding Area**

No comment.

- **Ribble Crossing**

This would be a major new temporary built feature in an area of land which forms part of the setting to the Forest of Bowland AONB. The proposed Ribble crossing would be comprised of substantial civil engineering structures including an approximately 1,300 m long haul road and a 42 m (approximate) clear span bridge over the River Ribble. The report's description of the proposals differs to that provided for the Hodder Crossing in that there is a much stronger emphasis on the temporary nature of the work, e.g. "*The route would be a temporary feature that would be removed entirely following completion of the HARP construction programme in the Ribble Valley area; land would be reinstated back to its current use and setting.*" By comparison,

the description of the Hodder Crossing proposals makes no reference to removal of the features or reinstatement.

As with the Hodder crossing there is also the issue of whether the Ribble Crossing would be retained as a permanent feature, effectively creating a 'bypass' for Waddington - something which has no policy basis or justification as it is not in Ribble Valley's ***Districtwide Local Plan*** or ***Adopted Core Strategy***. The scale of the Ribble crossing engineering works would like the Hodder crossing be considerable and expensive. However, unlike the Hodder crossing, it seems that the proposed haul track would not be made to the same adoptable highway standards as the report text states that it would be a *"dedicated sealed road across open farmland."* It is not clear what this surfacing would be although some form of granular aggregate seems likely but it should be borne in mind that this could be easily upgraded to a highway standard if required and, with much of the construction work already undertaken as part of the HARP project, the cost of doing this would be substantially lower than it otherwise would have been.

To achieve certainty regarding removal of the temporary Ribble crossing, if the determining authority is minded to approve the application, it is once again recommended that consideration be given to ensuring that approval be subject to agreement made between United Utilities and Ribble Valley Borough Council over removal details, timescales, remediation works, completion date, etc.

In many ways, the landscape of the area the Ribble Crossing shares similar characteristics to the area the Hodder crossing would be within. Situated within a valley - albeit a much broader one than that of the River Hodder - the Ribble crossing site is also mostly comprised of pasture with field boundaries often lined with trees and hedgerows some of which would likely have to be removed to make way for the proposed structures. This limited vegetation cover - there are no copses or areas of woodland within the site - and the gently rising topography of the valley sides affords good intervisibility with the surroundings which includes Waddington Conservation Area. The valley is also crisscrossed by a network of public rights of way which also afford good visibility of the site. This visibility combined with the open farmland, elevated topography of the surrounding area and limited existing vegetation which could filter views all suggest that the new Ribble crossing structures would likely be prominent features in the landscape which forms part of the setting to the Forest of Bowland AONB. For all these reasons, I have reservations regarding the choice of this site for a temporary haul route and crossing over the River Ribble and am concerned that the civil engineering features would not protect, conserve or enhance the setting to the nationally important Forest of Bowland AONB.

- **Highways Works (many within the Forest of Bowland AONB)**
Various works including passing places, sections of road widening and junction improvements are proposed at 58 sites. The roadsides within the Forest of Bowland AONB contain a significant number of trees which are key features of the landscape character. With highway works proposed at 58

locations, there is the potential for a considerable loss of trees. Critical to minimising the number of trees lost and associated adverse landscape and visual effects is adoption and implementation of the following tree protection 'code' for the highway works design:

- tree removal is only undertaken *when no other option is available*, i.e. it is the absolute last resort option.
 - no loss of any trees which are an irreplaceable resource, i.e. veteran, ancient, notable and significant (historical, cultural, horticultural). Highway works which could affect these trees would be micro sited to avoid them.
 - no net loss of trees.
 - all highway design work will be informed by tree surveys that contain, amongst other things, detailed and accurate information on the root protection areas of all trees that could potentially be affected by the works.
 - all highway design work is informed and guided by the standards and requirements of ***BS5837 Trees in relation to design, demolition and construction – Recommendations***.
- **Management of surplus arisings from tunnel boring**
Except for the Lower Houses Compound, United Utilities no longer have any proposals for retaining surplus material within the planning application boundaries. Instead, all other surplus material would be directed to Waddington Fell Quarry for processing and placement as part of that site's restoration plan. This proposal is a considerable achievement which United Utilities deserve much credit for as it will have huge beneficial implications for protecting and conserving the Forest of Bowland AONB's landscape and character. I absolutely agree with and support this proposal.

2. Consideration of Alternatives

As the scoping request report contains 7 new design developments not presented in United Utilities 2019 scoping report the environmental statement should provide full details of the landscape and visual assets/constraints used to inform their decision making process and explain the rationale behind their area/site selection and the weighting applied to them during multi-criteria decision analysis work. In addition, the environmental statement should demonstrate that robust methodology has been transparently used to:

- determine the broad search areas for the new sites;
- identify the indicative development envelope within the broad search area and the final option selected for the project; and
- respond positively to stakeholder feedback.

Given the national importance and sensitivity of the AONB landscape, the environmental statement will need to provide details of the consultation process, stakeholder events, feedback received and how it has been used to inform the decision making process, final option selection, design and decommissioning activities.

3. Proposed transport route serving the Lower Houses Compound

The report advises that *"the proposed transport route serving the Lower Houses Compound in Lancaster City Council's administrative area would involve directing construction vehicles into Craven District Council's area. There would be some minor development required in Craven District in connection with the proposed transport route, specifically limited widening of short sections of the existing highway to enable the safe passage of construction vehicles. It has been agreed with both local authorities that Lancaster City Council will determine, on behalf of Craven District Council, those elements of the planning application which fall within Craven District."* As the area within Craven District where the highway works are proposed forms part of the setting to the Forest of Bowland AONB, I confirm that my review and assessment of the HARP project on behalf of the AONB JAC will include these areas.

4. Decommissioning

Full details of the decommissioning of temporary features, such as access roads/haul roads, bridges, structures etc, including timing, working methods and reinstatement proposals should be included within each environmental statement.