

## Nicola Gunn

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**From:** Planning  
**Subject:** FW: R&U Planning Application Comments - 3/2021/0660

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**From:** Contact Centre (CRM) <[contact@ribblevalley.gov.uk](mailto:contact@ribblevalley.gov.uk)>  
**Sent:** 23 August 2021 18:11  
**To:** Web Development <[webdevelopment@ribblevalley.gov.uk](mailto:webdevelopment@ribblevalley.gov.uk)>; Planning <[planning@ribblevalley.gov.uk](mailto:planning@ribblevalley.gov.uk)>  
**Subject:** Planning Application Comments - 3/2021/0660

**Locality:**

**County:** Lancashire

**uprn:** 10022967854

**usrn:** 31802099

**ward:** E05005295

**Planning Application Reference Number:** 3/2021/0660

**Address of Development:** HARP development

**Your Comments:** Carbon Emissions:

United Utilities plans for Net Zero Carbon by 2030 on its website has pledged for North West's water services to use 100% renewable electricity by 2021 and to have a 100% green vehicle fleet by 2028.

United Utilities, Lancashire County Council, Greater Manchester County Council and Ribble Valley Borough Council all have net zero carbon targets that are more ambitious than 2050 but all seem to think that they can 'pass down' the responsibility for this.

There is no mention of sustainability, renewable energy sources or consideration of alternative (conveyor/cable car) or green (electric vehicles) methods of transport. There are plans for diesel generators at the compound site and a fleet of diesel trucks travelling up and down Waddington Fell for 12 hours per day.

Of the 294 documents which have been loaded on to the Ribble Valley Borough Council website there is only one that mentions climate change (Environmental Statement Volume 2 Chapter 18: Air Quality and Climate Change on 2 pages out of 40) and this is the conclusion:

#### 18.8.4 Mitigation

140 In order to mitigate potential carbon emissions and address the climate agenda, United Utilities would implement its climate change mitigation strategy. It is anticipated that the most effective intervention on HARP would be in the supply chain. United Utilities is therefore proposing to embed carbon and climate agenda-related requirements in the procurement process for consortia seeking to finance, design, build and maintain HARP. While still in development it is intended that these procurement requirements will be a mandatory part of the tendering process, and will be carried forward into the contract requirements for the newly-appointed consortia.

When we are facing a climate emergency this seems woefully inadequate

There must be strict and enforceable planning conditions for all contractors and all elements of the supply chain in

terms of sustainability and carbon emissions. Passing down vague aspirations and ambitions is simply not enough.

Road safety particularly for cyclists:

At a preplanning meeting with LCC it was made clear that road safety and seasonality must be taken in to consideration and at a subsequent meeting LCC requested safety audits as part of this planning process. Covid has been used as a reason not to undertake such surveys or audits. (Due to Covid-19 restrictions it was not possible to undertake surveys to establish representative usage levels of public roads and rights of way by non-motorised users) The Waddington Fell route is a popular and busy cycle route. It is the gateway to the Forest of Bowland which is a very popular cycle destination drawing visitors from across the region. It is listed in many local and national guide books. The climb is renowned and features regularly in local and national racing calendars. Many local businesses cater for cyclists and depend upon this trade.

It is extraordinary that no surveys of the number of cyclists using this route have been undertaken.

In the Environmental Statement Volume 2 Chapter 16: Transport planning it states that

'The assessment of potential effects was based upon traffic surveys collected by Tracsis (on behalf of United Utilities) during October and November 2019 at 12 locations, on the local highway network.'

These are probably the quietest months of the year for traffic. No account has been taken of the farming calendar nor the fact that the Forest of Bowland AONB is a tourist and cyclist destination. They have only looked at motorised vehicles and the stated requirement to take in to account seasonality has been ignored.

It is stated by Jacobs that

'review of localised potential impacts on equestrians, pedestrians and cyclists and existing Public Rights of Way will be addressed in the Public Access and Recreation chapter'

and yet in the Public Access and Recreation chapter there is no reference to this.

There must be much more analysis of and mitigation for other road users.

Consideration should be given to providing designated cycle paths and passing places.

In the absence of this there must be strict and enforceable rules on designated areas for overtaking and required berth for overtaking plus additional training for truck drivers. There should also be more stringent limitations on HARP traffic during daylight hours (particularly at weekends).