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Sent: 01 March 2023 15:59
To: Planning
Subject: Planning Application Comments - 3/2021/0660 FS-Case-492343732

Planning Application Reference No.: 3/2021/0660

Address of Development: Bowland and Marl Tunnels

Comments: I wish to start by stating that I completely understand the need for United Utilities (UU) to undertake the HARP project but I am totally against it in its current form. My particular objection relates to the proposals for work in the Forest of Bowland AONB. Indeed, if the current proposed plans receive planning consent it would seem highly likely that AONB status would be lost in part of the Ribble Valley. The proposed Haul road from just outside Newton in Bowland to the work site will be a huge blot on the landscape in itself whilst ensuring 'reasonable' access for HGVs over the Fell Road will involve the destruction of walls and trees that will result in a completely changed landscape.

For some years, during the 'consultation' process, I am aware that UU have been asked to look at alternative ways of undertaking the project, particularly as it relates to the transportation of waste from the tunnel site to Waddington Fell Quarry. For example, repair the existing tunnel, transport the waste by cable car (I understand this is the method used for over 40% of transportation in Germany), transport the waste by rail (electric?) and so on. A couple of years or so ago, I joined an online 'consultation' call with UU when these and other alternatives were suggested. UU's response was that they had looked at all alternatives and concluded that a second tunnel with transportation using the B6478 was the best solution. We asked for the details relating to this conclusion but UU said the proposed way was the best and the decision is the decision. I found this very frustrating but, at the time, did not believe there was any realistic way of challenging this.

It is only in the last few days that I have been made aware of S177 of the Planning Act as it relates to an AONB. As I now understand the position, the default planning decision for such a project in an AONB should be to reject the application although exceptions for approval are catered for. But, the requirements of S177 do not appear to have been met by UU in a number of important ways, including detailed reasons why alternative ways of undertaking the project are unsuitable. What criteria did UU use to reject alternative ways? We, and the Planning Committee I presume, have no way of knowing whether an alternative way that does not cause major damage to part of the AONB, possibly forever, could be realistic. And then, under the current proposals, there is a huge increase in large slow moving diesel vehicles for many years, the complete opposite to National policy on transportation. Surely in the 21st century there must be alternative ways of undertaking such a project without giving rise to such unacceptable consequences.

In addition to the major damage caused to the AONB by the current proposals, other consequences that are not properly considered, although some at least are required by S177, are damage to the local economy, although this is likely to be extensive, restricted access for tourism and recreational purposes and the effect on local residents, including their mental health, who for much of the time will find it extremely difficult, and potentially dangerous, to use the B6478. Yet, the main shopping location for local residents is Clitheroe, including the market. Have UU undertaken any risk assessment in these respects? What, for example, will be the consequences for residents

wishing to sell their houses during the period of the project? Probably a material reduction in prices at best, or unsalable at worst.

Every single consequence discussed above is caused by UU's current proposals. It is this that makes the project extremely undesirable as proposed and it is this that I believe should be challenged by RVBC under S177 and rejected for now.