

Appendix A1: Summary of Consultation Responses to the Lancaster City Council Application (21/00792/FUL)

Document reference: LCC-BO_SEI-A1



Haweswater Aqueduct Resilience Programme - Proposed Bowland Section

Supplementary Environmental Information

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February 2022



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1. Summary of Consultation Responses to the Lancaster City Council Application (21/00792/FUL)

1.1 Introduction

- 1) This report provides a consultation response from United Utilities (UU) in respect of the comments received post submission to the Lancaster City Council planning application (ref: 21/00792/FUL) from statutory agencies, local authority officers, non-statutory organisations as well as public comments where a response has been provided to the key themes.
- 2) It should be noted that this document has considered responses received during the period between the submission of the planning application in June 2021 and December 2021. Any responses received by the Lancaster City Council after the 9th December 2021 have not been considered within this document.

Resp No.	Consultation Response Text	United Utilities Response	Action
LANCASHIRE COUNTY COUNCIL – HISTORIC ENVIRONMENT TEAM			
BO LCC 1	<p>The Historic Environment Team is of the opinion that the proposed mitigation as outlined in section 10.8.1 of the Environmental Statement, Vol.2 is an appropriate means of mitigating any adverse impact of the proposed development on any archaeological features, known or currently unknown, that might lie within those parts of the proposed development.</p> <p>Consequently, the Historic Environment Team would advise that the mitigation measure outlined in section 10.8.1 of the Environmental Statement, Vol. 2, a staged programme of post-permission, but pre-construction, work is secured by means of condition.</p>	<p>United Utilities support the principle of the proposed condition requesting that a staged programme of pre-construction mitigation is submitted and approved by the Local Planning Authority but would seek for this to be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.</p>	<p>Lancaster City Council to consider use of the recommended condition.</p>
NATURAL ENGLAND			
BO LCC 2	<p>Designated Landscape (Forest of Bowland AONB)</p> <p>Further information is needed about how the scheme has been planned, particularly in relation to the siting of individual components of the 'pre-operational' construction phase, is fully commensurate with the area's designated status and its high sensitivity to this sort of major development.</p> <p>Note that no mitigation is proposed for any of the compounds as they are considered to be 'temporary'. We understand that the compounds will be removed and land reinstated once works are complete. In that sense they are 'temporary'. However, the works would be undertaken for a >10 year period which is a long-term presence within the AONB. Mitigation measures should therefore be considered, encompassing both the careful selection of sites</p>	<p>Designated Landscape (Forest of Bowland AONB)</p> <p>Appendix A of our Planning, Design and Access Statement submitted in support of the application sets out the policy requirements of the Major Development Test in respect of works proposed in an AONB and provides an assessment of the Proposed Bowland Section against these requirements.</p> <p>Regarding the Lower Houses compound, the location is constrained by the need to connect onto the existing aqueduct. We have sought to make connections as near as possible to the existing aqueduct to minimise the disturbance and environmental impact associated with lengthy sections of open cut pipework. The compound would be a prominent feature in landscape and visual terms, so the landscape work has focussed on avoidance of features and the undertaking a of thorough landscape and visual assessment so that the impacts are well understood. All areas</p>	<p>Lancaster City Council to consider use of the recommended conditions.</p>

<p>and further screening and operational measures. The latter can include lighting and noise reduction strategies.</p> <p>Wray Satellite Compound - We are concerned about this temporary compound and its landscape and visual impacts on the AONB. Our concerns mirror those we have raised in relation to the Lower Houses compound. This site forms part of the undeveloped landscape within the AONB, which underlines its sensitivity to this intrusive and highly visible development.</p> <p>The importance of pre-operational mitigation</p> <p>Given the significant effects that the pre-operational phases will have on this nationally designated landscape, we expect mitigation measures to be identified and applied to lessen the effects as far as is practicable. Para 177c of the NPPF does not limit moderation (aka mitigation) measures to only the completed scheme.</p> <p>We note that no mitigation is proposed for any of the compounds as they are considered to be 'temporary'. We understand that the compounds will be removed and land reinstated once works are complete. In that sense they are 'temporary'. However, the works would be undertaken for a >10 year period which is a long-term presence within the AONB. Mitigation measures should therefore be considered, encompassing both the careful selection of sites and further screening and operational measures. The latter can include lighting and noise reduction strategies.</p> <p>Off-site Highway Works</p> <p>Off-site highway works have not been considered within this application. We advise that it is not appropriate to defer the consideration of these works until after a decision has been issued as the implementation of the development depends on these</p>	<p>would be reinstated to their original use and features reinstated as existing.</p> <p>In consultation with LCC Highways, the site selection process for the Wray Satellite compound was primarily driven by the need to identify a location with sufficient space, adjacent to the main route from the M6 and close enough to both haulage routes for logistics reasons. The nearest site outside of the AONB is approximately 8km to the west and would be too far away to allow for effective marshalling of vehicles along routes 1 and 2. The location selected is adjacent to the B6480 and would involve minimal disturbance to existing landscape features.</p> <p>Further explanation is provided in Section 4 of the Main Supplementary Environmental Information (SEI) Report.</p> <p>The importance of pre-operational mitigation</p> <p>Chapter 20 in Volume 2 of the Bowland ES presents a summary of the mitigation proposed in respect of proposed construction activities. The Chapter also references the Construction Code of Practice (CCoP) (Appendix 3.2 in Volume 4); Schedule of Mitigation (Appendix 20.1 in Volume 4); and Environmental Masterplan (EMP) (Figure 20.1 in Volume 3), which provide further detail on the mitigation proposed.</p> <p>We note that a number of conditions have been recommended by the AONB's Landscape Advisor, one of which includes the preparation and submission of further information regarding planting proposals. United Utilities support the principle of the proposed conditions, but we would request that these be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.</p>	
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	<p>works being undertaken, therefore they need to be considered as a whole.</p> <p>The impact from each change to the highway needs to be considered individually as well as the cumulative impact on the character of the AONB. The in-combination impact as a result of these highway works and the whole development also needs to be assessed to consider the impact of the whole project on the AONB.</p> <p>Soils, Land Quality and Reclamation</p> <p>Natural England advise that any grant of planning permission should be made subject to conditions to safeguard soil resources</p> <p>Habitats Regulations Assessment</p> <p>No Objection</p> <p>Sites of Special Scientific Interest (SSSI) Assessment</p> <p>No Objection</p>	<p>Off-site Highway Works</p> <p>The proposed off-site highway works are shown on the planning application drawings and are assessed in Volume 5 of the Environmental Statements. An additional 8 no. highway modifications along Eskew Lane and two intermediate HGV Holding Areas on Spen Brow are now proposed and are assessed in the SEI.</p> <p>The requirement for highway modifications has been driven by the need to ensure highway safety along the proposed haulage routes is maintained. To minimise the impact of the temporary works on features of landscape and ecology interest, the widened sections would be located to provide proportionate inter-visibility, ensuring that where there is a possibility of vehicles meeting on narrower sections there is minimal risk of vehicles having to reverse (i.e., there is space for over run as per existing operation).</p> <p>A proactive maintenance regime would be put in place to intervene before any road formation issues escalate as consequence of overrun. This approach achieves a balance between addressing existing pinch point and visibility limitations and avoiding so far as reasonably practicable impact on landscape and ecology within the AONB.</p> <p>Section 5 of the SEI Report reappraises the cumulative environmental effects of the Proposed Bowland Section, compared with the cumulative assessment presented in Volume 2 of the June 2021 Environmental Statement.</p> <p>Soils, Land Quality and Reclamation</p> <p>United Utilities support the principle of the proposed condition, but we would request that it be aligned to an agreed phasing plan to allow the sequencing of development with discharge of</p>	
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		conditions aligned to commencement of specific phases of construction.	
LANCASTER CITY COUNCIL – ENVIRONMENTAL HEALTH			
BO LCC 3	<p>Although this is a major infrastructure project of regional significance, this should not mean that legitimate concerns of local people are not taken into consideration.</p> <p>I have reviewed the detailed construction management plans covering noise, dust, working hours and light pollution and am satisfied that sufficient mitigation has been planned into the application.</p> <p>In general, any approval needs to be conditioned so that the detailed mitigation methods outlined in the application submissions must be followed.</p>	United Utilities support the principle of the proposed condition requesting that a staged programme of pre-construction mitigation is submitted and approved by the Local Planning Authority but would seek for this to be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.	Lancaster City Council to consider use of the recommended condition.
HIGHWAYS ENGLAND			
BO LCC 4	No objection	No response required	No further action required
ELECTRICITY NORTH WEST			
BO LCC 5	No objection. Information on Services provided.	No response required	No further action required
COAL AUTHORITY			
BO LCC 6	The Coal Authority notes; that out of all aspects of the proposals, only certain offsite highway modifications fall within the defined Development High Risk Area. On the basis that the highway modifications fall within the definition of 'enabling works', which ultimately is a judgement for the LPA, then the Coal Authority	No response required	No further action required

	would see no justifiable reason for the imposition of the planning condition.		
GREATER MANCHESTER ECOLOGY UNIT			
BO LCC 7	<p>It is of note that the final, detailed impacts of the scheme on ecological receptors and the natural environment in general is uncertain at this stage, because a final contractor has not yet been appointed to deliver the scheme, and the requirements of the final contractor may influence the final detailed designs of the scheme.</p> <p>However, the applicant appears to have taken a 'worse-case scenario' approach and seems to have generally assumed greater habitat losses than will probably occur in practice.</p> <p>Survey work has been very comprehensive across (wider) site areas, allowing for comprehensive assessments to be made of potential wider impacts on habitats and species.</p> <p>I would therefore regard the Assessment of Ecological Impacts as presented in the Environmental Statement as acceptable, and no further surveys need to be carried out before deciding the application.</p> <p>While it is noted that the majority of habitats to be lost as a result of the scheme will be reinstated following the completion of the works, the works are expected to take a number of years. Newly created habitats will also take some time to reach maturity. Habitat losses within works areas cannot therefore really be considered to be strictly temporary as described in the ES, since species will potentially be displaced for prolonged periods of time.</p> <p>It is therefore right that efforts will be made to restore habitats within the application boundaries between the completion of enabling works and the start of construction works proper, and as soon as possible following completion of construction works. The</p>	<p>United Utilities support the principle of the proposed conditions and obligations but would request that any conditions be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.</p>	<p>Lancaster City Council to consider use of the recommended conditions and obligations.</p>

	<p>statements at various places in the ES that habitat re-instatement and repair will be undertaken as soon as practically possible are welcome.</p> <p>It is also appropriate that off-site habitat creation and repair is regarded as an integral part of the scheme (that is, as part of the compensation offer), and not just in the interests of achieving a net gain in biodiversity.</p> <p>Overall conclusions and recommendations.</p> <p>I would recommend that a number of Conditions and Obligations will need to be applied to any permission which may be granted to the application to protect wildlife interests, and the natural environment in general.</p> <p>Recommended Conditions</p> <ul style="list-style-type: none"> • No tree felling or vegetation clearance required to facilitate the scheme should be undertaken during the optimum time for bird nesting (March to August inclusive) unless nesting birds have been shown to be absent by a suitably qualified person. • Any trees scheduled for removal as part of detailed plans for the scheme should be further inspected for the possible presence of bat roosts before any felling work commences. Surveys must be carried out by suitably qualified persons and to appropriate standards. If bats are found, measures must be proposed for the avoidance of harm to bats and for compensatory provision of replacement roosting sites. • A precautionary survey of the works areas for Badgers must be undertaken prior to any groundworks commencing. If the presence of badgers is recorded, a method statement must be prepared giving details of 		
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	<p>measures to be taken to avoid any possible harm to badgers</p> <ul style="list-style-type: none"> • Prior to any work commencing, a Method Statement providing details of Reasonable Avoidance Measures to be taken during any ground clearance works to avoid harm to reptiles, hedgehogs, amphibians and brown hares must be required to be prepared and once approved, implemented in full. • Measures proposed for mitigating and compensating for the ecological harm which the scheme will cause as set out in the Environmental Statement (and in particular in the Construction Code of Practice (Appendix 3)) and Chapter 9 (Terrestrial and Aquatic Ecology)) should be required to be implemented in full. • Comprehensive Habitat and Landscape Management Plans must be required to be prepared for any proposed new on-site landscapes and habitats. Management Plans should include details of the legal and funding mechanism{s} by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. • An Ecological Clerk of Works must be required to be appointed to oversee all aspects of the enabling, construction and reinstatement works. <p>Recommended Obligations</p> <p>There is likely a need for a legal agreement to be prepared and agreed to secure the off-site habitat creation works proposed in the application as compensation for habitats lost to the scheme, and in the interests of securing Biodiversity Net Gain.</p> <p>Habitats created in the interest of net gain need to be managed appropriately for a period of at least 30 years post-completion. To secure this long-term management, detailed Management Plans</p>		
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	<p>for newly created habitats must be required to be prepared, and subsequently agreed with the local planning authority.</p> <p>Newly created habitats must be regularly monitored to ensure that the required habitat condition is being achieved. A monitoring timetable must be included as part of the long-term management plan, as well as description of a feed-back mechanism by which the management prescriptions can be amended should the monitoring deem it necessary</p>		
LANCASTER CITY COUNCIL ARBORICULTURAL OFFICER			
BO LCC 8	<p>The cumulative effects of the removal of boundary features, especially hedgerows to enable the road widening schemes are significant and will adversely affect the local landscape. The loss of which cannot simply be compensated for with replanting. However, based on the need for the delivery of HARP, I would not object to the proposals, subject to the provision of detailed site specific Arboricultural Method Statements (AMS) and Tree Protection Plans (TPP). It would be hoped that the production of the above and ongoing dialogue will enable the extent of removal to be kept to the absolute minimum.</p> <p>Additional comment:</p> <p>-The Lower Houses compound proposed site layout includes the position of 19 new trees. Is further detail available with regards to the planting and is there an opportunity to carry out additional planting in this area?</p> <p>-It is not clear what level of hedge removal is required to construct the satellite compound? If hedges need to be removed to provide visibility splays is laying an option?</p>	<p>Appendix 20.2 'Planting Proposals' in Volume 4 of the Proposed Bowland Section Environmental Statement provides greater detail regarding the specification of proposed planting. Trees and hedgerows are proposed where considered in keeping with the landscape character and in accordance with landowner requirements. The off-site biodiversity net gain offsetting proposals incorporate sufficient planting to achieve 3:1 replacement for all features lost.</p> <p>As shown on Drawing Number 80061155-01-UU-TR3-XX-DR-C-00058, only small sections of the existing roadside hedgerow would need to be removed at the access and egress points. The removed sections of hedgerow would be reinstated with a species mix to match the existing hedgerow in the first available planting season following completion of the works. If necessary for visibility purposes, we would ensure the hedgerow between the access and egress points is laid rather than removed altogether.</p> <p>United Utilities support the principle of the proposed conditions, but we would request that these be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.</p>	Lancaster City Council to consider use of the recommended condition.

NORTH YORKSHIRE COUNTY COUNCIL (AS HIGHWAY AUTHORITY FOR CERTAIN ELEMENTS OF THE PROPOSED SCHEME)			
BO LCC 09	<p>In assessing the submitted proposals and reaching its recommendation the Local Highway Authority has taken into account the following matters: Works to Highways within North Yorkshire and travel plans for proposed aquaduct work. Consequently the Local Highway Authority recommends that the following Conditions are attached to any permission granted:</p> <p>MHC-15A Construction Management Plan</p> <p>The Plan must include, but not be limited, to arrangements for the following in respect of each phase of the works:</p> <ol style="list-style-type: none"> 1. details of the routes to be used by HGV construction traffic and highway condition surveys on these routes; (AS PER INFORMATION ON APPLICATION) 2. protection of carriageway and footway users at all times 3. details of site working hours; 4. measures to control and monitor construction noise; 5. details of the measures to be taken for the protection of trees; if any 6. details of ditches to be piped during the construction phases; if any 7. a detailed method statement and programme for the building works; and 8. contact details for the responsible person (site manager/office) who can be contacted in the event of any issue. 	<p>United Utilities support the principle of the proposed condition, but we would request that it be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.</p>	<p>Lancaster City Council to consider use of the recommended condition.</p>

RIBBLE VALLEY BOROUGH COUNCIL			
BO LCC 10	<p>I wish to inform you that having had due consideration to the details within the planning application; Ribble Valley Borough Council recognises the public benefits which will arise from the necessary repair to this infrastructure and therefore raises no objection subject to appropriate conditions and obligations to mitigate any harm arising from the development.</p> <p>RVBC request that detailed consideration is given to the handling of waste arising from the replacement of the tunnel and the impact of this on the highway network. RVBC also request that detailed consideration be given to the impact on the landscape and ecology.</p>	No response required	Lancaster City Council to consider use of necessary conditions
CRAVEN DISTRICT COUNCIL			
BO LCC 11	<p>After reviewing the details the Council has no objection to the proposal, but would stress that any land affected is re-instated to the level prior to the works commencing and that the management of traffic is in accordance with details provided.</p> <p>If the application is subject to change then please re-consult with the Council</p>	No response required.	No further action required
LANCASHIRE COUNTY COUNCIL (HIGHWAY AUTHORITY)			
BO LCC 12	<p>There remains a lack of clarity for non-vehicular users and the impacts on private accesses... it is clear that there are multiple PRow and access points that cross or emerge at the proposed access routes. At all times, users will need to understand clearly the traffic management on the highway</p>	<p>The LCC Bowland February 2022 CTMP incorporates further consideration of non-motorised users (see Figure C-2-01, Figure C-2-13 and Figure C-2-32). Where existing PRow meet the proposed access routes, visibility is typically unobstructed and there are existing areas that provide pedestrian refuge. To ensure conditions (visibility and space) are maintained at all such junctions United Utilities would ensure an appropriate vegetation management regime is implemented as part of the proposed highways agreement.</p>	<p>Ongoing dialogue with the Highway Authority to be maintained following their review of the supplementary information submitted. Lancaster</p>

		HGV movements along Helks Brow and Furnessford Road would be undertaken in escorted convoys. Marshalls would sweep the route in advance of the convoys, ensuring any non-motorised users have left the highway before the convoy is allowed to proceed.	City Council to consider the use of necessary conditions, such as the implementation of the measures set out in the LCC Bowland February 2022 CTMP.
BO LCC 13	The documentation does not clearly identify the type of road widenings and passing places	Planning Drawings LCC-BO-APP-004-12_01 to 13 indicate the type of highway modification proposed in each location along haulage routes 1 and 2. The design for each location would be developed further during detailed design and it is considered that the final designs could be submitted to the Local Planning Authority for approval in order to discharge the requirements of a planning condition.	In addition, draft Heads of Terms to address "Extraordinary Construction Access to the Highway", which includes for obligations relating to monitoring and maintenance has been provided to the Highway Authority for comment. United Utilities will continue to liaise with the Highway Authority with a view to take on board any comments required to agree the Heads of Terms.
BO LCC 14	We would request the applicant to confirm if these are the largest expected vehicles along the proposed routes. All swept paths to include the additional requirement of wing mirrors in order to demonstrate vehicles can pass without obstruction	Swept path analyses have been provided for all worst-case scenarios in line with the controls set out in the LCC Bowland February 2022 CTMP and these include vehicle wing mirrors. The swept path analyses have been used to determine the highway modification proposals. Swept path analyses carried out for route 2 (via B6480) are based on the largest vehicle that would use that route. The swept path analysis for route 1 (via Main Street) takes into account the need for abnormal indivisible loads (AIL) to use that route and the road modifications proposed. The AIL appendix in the LCC Bowland February 2022 CTMP includes AIL swept path at key pinch points along route 1.	
BO LCC 15	It is noted that swept path analysis is not provided for the A683, and there are no highway works proposed along the A683	The A683 is considered to be suitable to accommodate all HGV types without the need for highway modifications.	
BO LCC 16	Regarding the junction between A683 & B6840 - A scheme is required to overcome junction deficiencies (lining and signing)	We have undertaken an assessment at this location and consider that adequate mitigation has been factored into the scheme design, commensurate with the limited increase in volume of traffic utilising the network as a result of the proposed scheme. A road safety audit would be carried out and United Utilities commits to implementing the findings of the audit in accordance	

		with the requirements of a suitably worded planning condition. United Utilities would request that the condition be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.	
BO LCC 17	Between RW01 and RW02 the B6840 is narrow with almost constant evidence of overrun by larger vehicles, no improvements are proposed; it is considered that a scheme of verge maintenance is considered (one that is over and above that currently undertaken by the LHA to satisfy current levels of operation)	The proposed highway agreement would include for the implementation of a proactive scheme of verge monitoring and maintenance in order to satisfy current and proposed levels of operation.	
BO LCC 19	Safety of pedestrians required to walk in the road over the section Lunesdale Court to/from Hornby village (a need for a footpath)	Our proposals include for a reduction in the prescribed speed limit to 40 mph along the B6480 from the junction of the B6480 with the A683 to the existing 30 mph limit in Wray. Additionally we would extend the existing advisory 30 mph speed limit bends adjacent to Lunesdale Court through to the existing 30 mph limit in Wray in both directions. All construction traffic would be required to comply with advisory speed limits. These measures are considered sufficient mitigation for the anticipated impact of construction. The proposed mitigation would be subject to continuous monitoring and review (see Section 7 of the CTMP) and in light of any identified issues, additional measures would be developed and implemented as necessary, in accordance with the proposed highways agreement.	
BO LCC 20	Safety concerns over the B6480 / Station Road / Moor Lane junction. Road surfacing and road markings in poor condition, evidence of vehicle overrun on verges. There is a need for speed limit review (30mph / slow signs / traffic calming).	Construction related traffic would be limited to 30mph when driving along the haulage routes and an advisory 30mph speed limit for other road users would be advertised along the haulage route, as confirmed in the LCC Bowland February 2022 CTMP. Signage would also be erected urging other road users to take extra care when driving along the route. The speed of construction vehicles would be monitored in accordance with the measures outlined in the LCC Bowland February 2022 CTMP.	

		<p>A road safety audit would be carried out and United Utilities commits to implementing the findings of the audit in accordance with the requirements of a suitably worded planning condition. United Utilities would request that the condition be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.</p>	
BO LCC 21	<p>Regarding RW03 (but applies to all proposed modifications) - There is no detail that confirms the purpose of the widening... We require the applicant to clearly explain the rationale as to why the number and location of road widenings / passing places is the acceptable solution to the multiple constrictions along the routes</p>	<p>As set out in the LCC Bowland February 2022 CTMP, the intention is that existing two-way roads would operate as they do now. The proposed road modifications are considered a proportionate enhancement to existing operation. The engineering design approach, as set out in the LCC Bowland February 2022 CTMP, sets out the rationale adopted to identify the location of road widening proposals to facilitate more frequent informal contraflows at existing constrictions.</p> <p>Where constrictions are present it is evident that when HGVs currently meet at such points, having travelled beyond a point where an informal contraflow can be established, they pass by overrunning the road edge rather than reversing. The current proposals would not completely eliminate the possibility of this happening, but they would reduce the risk associated with it, through:</p> <ul style="list-style-type: none"> • The implementation of an extensive programme of driver training and public engagement; and • The implementation of a proactive scheme of verge monitoring and maintenance in order to intervene before any road formation issues escalate as a consequence of any overrun. The proposed highway agreement would include a requirement for the implementation of such a scheme, in consultation with the Highway Authority. <p>During the design process, consideration was given to imposing an operational logic whereby construction traffic is compelled to stop</p>	

		<p>at designated passing places at regular intervals. Some formal waiting areas/passing places are proposed for specific purposes, such as the Spen Brow Holding Areas, which are required to enable one-way movement (in either direction) of construction traffic along Furnessford Road, without causing disruption on the network, however, the adoption of formal passing places along the whole length of the haulage routes was not taken forward for the following reasons:</p> <ul style="list-style-type: none"> • It may lead to increased frustration of non-construction related road users, leading to a higher likelihood of impatience and potentially causing dangerous overtaking; • It may lead to increased vehicle wait times in passing places disrupting local residents and businesses • It would result in a significant increase in the scale of the works, leading to greater community disturbance and causing adverse impacts in terms of habitat loss and loss of visual amenity within the Forest of Bowland Area of Outstanding Natural Beauty. • Would reduce the likelihood of the operational logic being self-policing due to: <ul style="list-style-type: none"> ○ Risk of non-construction traffic, for example visitors to the local area, using the passing places for parking. ○ A significant change in how single carriageways operate, which may not be intuitive to drivers, leading to difficulties implementing and enforcing the regime. 	
BO LCC 22	Wennington pinch point - no measures are proposed	<p>Construction traffic associated with the proposed scheme would be limited to 20 mph when travelling through Wennington, as confirmed in the LCC Bowland February 2022 CTMP. The speed of construction vehicles would be monitored and signage urging other road users to take extra care when approaching the pinch point would be erected.</p>	

		The LCC Bowland February 2022 CTMP provides detail relating to traffic management proposals at 'the narrows' in Wennington. The proposals comprise a priority passing system, controlled through the implementation of 2 no. give ways, which would ensure the safe movement of vehicles through 'the narrows'. Further details are provided in the LCC Bowland February 2022 CTMP.	
BO LCC 23	With regard to passing places (PP01 to PP06), it is unclear given the proposals outlined to date i.e., one-way movement of Route 2 vehicles and controlled unopposed movements of Route 1 vehicles, why passing places are needed?	<p>Extensive road widening is proposed at locations where the swept path analysis indicates that the largest anticipated AIL movement would over run the existing verges. The intention is that construction convoys would only travel along Helks Brow with no traffic travelling in the opposing direction, the road being subject to a temporary closure during the movement. The length of this route is such that has been considered prudent to propose passing places that can be utilised by NMUs and/or vehicle refuge in addition to existing wider areas, the intention being that the traffic marshals clearing the route prior to the convoy using it can direct road users to these locations if necessary.</p> <p>The extent of road widening required will be subject to the Contractor's detailed design. There may be an opportunity to reduce or avoid road widening through the selection of alternative vehicles to those assumed in the LCC Bowland February 2022 CTMP.</p>	
BO LCC 24	It is unclear how the judgements have been made in regard to sight stopping distance and drivers' ability to judge whether to use a passing place or continue when forward visibility does not assist the decision (evidence base is needed to support any engineering judgements that can stand up to external scrutiny).	See response to BO LCC 21 above.	
BO LCC 25	Regarding Helks Brow - Where no widening is proposed, the route is narrow and at some locations hemmed in on both sides by fencing. There is limited opportunity for pedestrians / cyclists to find safe harbour on these sections.	See response to BO LCC 12.	

BO LCC 26	Make clear how [parking] restrictions will be delivered and managed	It is envisaged that the temporary parking restrictions would only be implemented on a small number of short duration occasions as set out in the LCC Bowland February 2022 CTMP. At least two weeks' notice of the parking restrictions being required would be provided to the local community via the community/highway liaison group, the formation of which we envisage being the requirement of a Section 106 legal agreement. Where required, the restrictions would be imposed under a temporary traffic regulation order. The provision of a Final CTMP, which we anticipate would be the requirement of a planning condition, would incorporate further detail on the implementation of necessary restrictions.	
BO LCC 27	Explain why only 20 new car parking spaces are proposed for vehicles displaced from Main Street as a result of parking restrictions	During site surveys, we observed approximately 20-25 vehicles parked on the sections of Main Street to be affected by temporary restrictions. On a conservative basis we have assumed 33 vehicles may be displaced. There are approximately 27 existing spaces on or adjacent to Main Street that would not be affected by the temporary restrictions, in addition to the additional 20 spaces proposed at the Bridge House tea rooms. On this basis, it is considered that the replacement parking provision proposed is adequate. We would engage in dialogue with local residents and businesses via the community/highway liaison group to provide awareness of the dates and times of any proposed restrictions.	
BO LCC 28	Pedestrian routing from the proposed parking provision should be shown on a plan	The LCC Bowland February 2022 CTMP includes a plan (Figure C-2-32) showing the envisaged routeing of pedestrians between the temporary parking area and Main Street.	
BO LCC 29	B6480 Hornby Road and Wennington Road (that is circa 150m from School Lane) is highly likely to receive displaced parking	We have committed to liaising with local residents and businesses to ensure their needs are understood and appropriate provision is made to mitigate temporary disturbance. Whilst we do not consider it necessary at this time, based on the level of replacement parking embedded in the scheme design, should	

		temporary parking restrictions need to be imposed on the B6480 then it is considered that this could be addressed through a TTRO.	
BO LCC 30	Can we guarantee TROs? What happens if we don't get them?	We would hope that, in the event planning permission is granted, the Highway Authority would support the adoption of a TTRO to prevent parking on Main Street for short durations to allow HGVs access along route 1. Appendix 3.1 in Volume IV of the Environmental Statement provides an explanation of the various routeing options considered and justifies the selection of the routes proposed.	
BO LCC 31	Our view is that the movements through Wray must not take place during school drop off / pick times	Noted. The LCC Bowland February 2022 CTMP confirms that no movements along Route 1 would take place during school drop-off or pick-up times. The proposed satellite compound would allow HGVs to be held until the restricted period has passed.	
BO LCC 32	The suitability of the bridge [over the River Roeburn] to accommodate the larger construction vehicles needs to be assessed and any necessary mitigation identified at this stage	We acknowledge that appropriate surveys of all structures potentially impacted by the proposed scheme would need to be carried out, however, it is considered that such works would form part of the Contractor's detailed design and therefore the submission of any findings, in addition to details of any necessary remedial works, would be covered in the proposed highways agreement.	
BO LCC 33	The CTMP should take into account feedback from residents impacted by the proposals	As a result of ongoing dialogue with local residents and in response to comments received through the planning application consultation period, we have amended our construction traffic access proposals, as set out in the LCC Bowland February 2022 CTMP. Our original proposal, as set out in the June 2021 CTMP, was to implement a one-way system for general construction traffic accessing the Lower Houses compound along route 2. The intention was that vehicles would enter the Lower Houses compound via the B6480, Eskew Lane, Long Lane, Spen Brow and Furnessford Road before egressing via Helks Brow and Mill Houses, re-joining Long Lane, and continuing north along Eskew Lane and back to the strategic road network via the B6480 and	

		<p>A683. In recognition of concerns raised regarding the impact that the imposition of a one-way system would have in terms of disruption to local residents and businesses, the one-way system no longer forms part of our proposals. Instead, construction traffic would both access and egress the site via the B6480, Eskew Lane, Long Lane, Spen Brow and Furnessford Road. To facilitate this approach, an 'access only' road closure along Furnessford Road is proposed, with movement of construction traffic limited to one-way. Intermediate holding areas are now proposed at the junction of Spen Brow and Furnessford Road to allow vehicles travelling south towards the site to be held before being cleared to proceed on the basis that no vehicles, including HGVs leaving the Lower Houses compound and local traffic are travelling north along Furnessford Road. Marshalls would operate along Furnessford Road confirming the road is 'cleared to proceed' before HGVs are released from either the intermediate holding area or Lower Houses compound. Stop and Go signs would be used at private access points and public rights of way along Furnessford Road to remove the potential for vehicles or pedestrians to enter the road once cleared to proceed for construction traffic.</p> <p>The intended use of the proposed Wray satellite compound has also been updated to take account of the revised construction vehicle routeing strategy described above. The satellite compound was originally intended as a park and ride area and holding facility for exceptional loads requiring access along Route 1 through Wray. Whilst this remains the case, the proposed Wray satellite compound would also be used as a marshalling facility for general construction traffic seeking access along Route 2. HGVs would be dispatched, usually in batches of up to 4 vehicles at a time, along Route 2 to the vehicle holding area at the junction of Spen Brow and Furnessford Road. The LCC Bowland February 2022 CTMP, however, makes provision for a larger number of vehicles at the Wray satellite compound. This is intended to demonstrate to the Highway Authority that there is sufficient capacity to</p>	
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		<p>accommodate HGVs off the B6480, thereby removing potential for queuing on the highway.</p> <p>In response to comments raised by Lancashire County Council as Highway Authority, our revised proposals also include for an additional 8 areas of road widening along Eskew Lane to ensure HARP construction traffic can safely pass non-construction related traffic.</p> <p>We have been in contact with residents and businesses directly affected by the alternative proposal and have received positive feedback. We would continue to engage in close dialogue with local residents to ensure their access needs are understood and would accommodate their requirements to limit disturbance as far as possible.</p>	
BO LCC 34	There may be a need for non-construction traffic to use the compound as a through route to access Helks Brow.	Non-construction traffic would not be permitted to use the route through the compound to access Helks Brow. The alternative access strategy described above removes the proposed one-way system, thus allowing local traffic to travel along the local network as they would now, except for the proposed access only restrictions on Furnessford Road.	
BO LCC 35	The access into the compound from Park House Lane needs to demonstrate that construction vehicles can be suitably and safely accommodated (including swept path analysis).	A sketch demonstrating the capacity for movement and parking of HGVs within the Lower Houses compound is presented in the LCC Bowland February 2022 CTMP. The sketch indicates that there is sufficient capacity to prevent delays or stacking at the access off Park House Lane.	
BO LCC 36	Regarding LH Park House Lane Entrance - LCC PRow also have concerns regarding the multiple PRowS that meet up at this location, and they will be providing further comment on this aspect	See response to BO LCC 51.	
BO LCC 37	Once we have a strategy that is considered could potentially work, then a full scheme road safety and operational audit will be	A road safety audit would be carried out and United Utilities commits to implementing the findings of the audit in accordance	

	required and satisfied. The audit should only be progressed at this stage and not before agreement is reached with LCC Highways. This audit will form part of the application documents and needs to be concluded prior to any determination. The outcomes of the audit are then to be fully incorporated into the CTMP.	with the requirements of a suitably worded planning condition. United Utilities would request that the condition be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.	
BO LCC 38	LCC Highways would request the most up to date data used to quantify vehicle movements	The submitted Transport Assessment and LCC Bowland February 2022 CTMP are based upon the latest predicted vehicle movements associated with the proposed works.	
BO LCC 39	Note: suggested planning conditions will include maximum vehicle numbers allowable for time periods and other limitations and restrictions	Noted.	
BO LCC 40	Junction Operational Assessments - view is TA in part does not reflect the impact of the construction traffic and the need for appropriate mitigation	A road safety audit would be carried out and United Utilities commits to implementing the findings of the audit in accordance with the requirements of a suitably worded planning condition. United Utilities would request that the condition be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.	
BO LCC 41	Collisions should be reviewed to identify any patterns or concern (causation factors and user types) that may be exacerbated by this proposal" - in particular they flag a cluster of accidents on the A683	A review of any patterns or concerns (causation factors and user types) that could be exacerbated by this proposal is ongoing and will be submitted to Lancashire County Council Highways.	
BO LCC 42	LCC Highways would expect to see full assessment of any proposals that impact on existing PROW and associated mitigation measures. Considerations should be given to the physical practicalities of access arrangements to demonstrate that indicative routes are safe and workable, where necessary mitigation measures will need to be developed to address identified impacts	See response to BO LCC 12.	

BO LCC 43	Impacts on existing bus stops and any need for temporary relocation must be identified at this stage, with the details agreed with the Local Highway Authority (not the bus companies). Any impact of the proposal that would result in delay to services / inability to adhere to timetables must be identified at this stage and necessary mitigation agreed	Figures C-1-01 to C-1-03 of the LCC Bowland February 2022 CTMP provide details relating to the proposed temporary relocation of two bus stops on the B6480, one adjacent to Lunesdale Court and one to the northwest of Wray. It is considered that the detailed design and implementation of the relocated bus stop could be the requirement of a suitably worded planning condition.	
BO LCC 44	Travel Plan - It is our view that the CTMP must demonstrate how safe and suitable access can be achieved and managed, and therefore, would expect this to include the management of the workforce and their travel to/from site (compounds / appropriate parking provision / shuttle buses)	The LCC Bowland February 2022 CTMP includes a commitment to developing a Travel Plan. The Contractor would prepare a Travel Plan, setting out how the Wray Satellite Compound would be effectively utilised to minimise the number of light vehicles on the local road network, in addition to further measures to embed sustainable transport principles in the behaviours of all construction personnel. It is considered that the development and submission of a detailed Travel Plan could be the requirement of a suitably worded planning condition.	
BO LCC 45	We would request swept path analysis around the compound (during typical peak operation)	Sketches demonstrating the capacity for movement and parking of HGVs within both the Lower Houses compound and Wray satellite compound are presented in the LCC Bowland February 2022 CTMP. The sketches indicate that there is sufficient capacity to prevent delays or stacking at the accesses.	
BO LCC 45	On both construction and connection drawings, there are 23 parking spaces shown (these appear to be for LGVs). I would question why there is a need for this number of spaces given the approach presented in regard to the satellite compound and the use of shuttle buses for the workforce. There does not appear to be parking provision for the shuttle bus / buses	The General Arrangement Drawings submitted as part of the planning application present a preliminary layout developed to allow for a reasonable worst-case assessment of likely environmental effects to be undertaken. Some parking for light vehicles is required at the Lower Houses compound, however, it is accepted that, taking into account the implementation of the Park and Ride facility, the number of parking spaces proposed at the compound would not in reality be required. The LCC Bowland February 2022 CTMP provides further clarity on the predicted number of spaces required at the Lower Houses compound and	

		confirms there would be adequate space for the parking of minibuses used to shuttle staff to site from the Park and Ride.	
BO LCC 46	PRoW 1-38-FP 22 that goes through the red line boundary of the compound and the need to provide an acceptable solution	There are two proposals for the diversion of the PRoW. The first proposal would include the creation of a crossing point where the current alignment of the PRoW intersects with the construction access track and a diversion around the edge of the construction compound. The second proposal would require a diversion along 1-38-FP 23 avoiding the construction access track and diverting along the field boundary to re-join the existing alignment of 1-38-FP 22. We note that Lancashire County Council's Public Right of Way Officer favours the second option as it would minimise disruption to users of the PROW. This option would be taken forward as part of an application for a temporary public right of way diversion in advance of construction.	
BO LCC 47	Regarding Satellite compound - Visibility splays and swept path analysis is required to demonstrate the suitability of the proposals. We would expect at no time for construction traffic to be permitted to wait on the public highway. Therefore, the access proposals, including any gates / checking points are located such that vehicles can turn off the public highway, and will not result in blocking back. Demonstrate the satellite compound is large enough for anticipated traffic.	The LCC Bowland February 2022 CTMP includes a sketch confirming there is sufficient space within the satellite compound to accommodate the expected number of HGVs and light vehicles without causing queuing back onto the B6480. The gatehouse would be set back into the site to prevent vehicles queueing back onto the public highway.	
BO LCC 48	It will be expected that the applicant will confirm commitment to appropriate s106 funding requests.	The need for funding to ensure the Highway Authority is able to adequately execute its duties agreed under the draft Road Condition Monitoring and Maintenance Strategy is recognised and we are in dialogue with the Highway Authority regarding this.	
BO LCC 49	Further development of the CTMP will be necessary to allow us to conclude matters	We recognise that a Final CTMP developed by the Contractor will be required and support the use of a condition to ensure it is	

		submitted to the Local Planning Authority for approval in writing prior to the commencement of the relevant works phase.	
BO LCC 50	It is essential that agreement is reached on how the access routes will be maintained, allowing unrestricted access, not only for construction traffic but also all other highway users	Draft Heads of Terms to address "Extraordinary Construction Access to the Highway", which includes for obligations relating to monitoring and maintenance, has been provided (10/06/21) to the Highway Authority for comment and we await feedback. We are committed to ensuring that there is sufficient provision for necessary monitoring and maintenance of the highway network throughout the construction of the Proposed Bowland Section and recognise the need for heads of terms to be agreed in advance of determination.	
LANCASHIRE COUNTY COUNCIL PUBLIC RIGHT OF WAY OFFICER			
BO LCC 51	Drawing LCC-BO- APP-004-05 shows the access road to the compound joining Park House Road at the same location that footpath 1-38-FP22, 1-38-FP23 and 1-38-FP44 terminate. Public Rights of Way require further details of the volume and frequency of HGVs accessing the compound and the mitigation measures proposed to ensure the safety of users on these footpaths.	The LCC Bowland February 2022 CTMP incorporates further mitigation measures to ensure the safety of non-motorised users. It is considered that there is sufficient space off the highway to act as a refuge area for pedestrians at this location. In addition, HGV movements to and from the Lower Houses compound along Furnessford Road are now proposed to be undertaken in escorted convoys (four HGVs at a time). Marshalls would sweep the route in advance of the convoys accessing or egressing the Lower Houses compound, ensuring there are no non-motorised users on the highway before the convoy is allowed to proceed.	No further action required.
BO LCC 52	Drawing 80061155-01-JAC-TR3-97-DR-C-00002 shows a stone road being created to the west of Lower Houses Cottage. The construction traffic routes (see attached overlay) identifies this stone road to be the compound access point, which raises safety concerns for users of footpath 1-38-FP21 which runs along the private road leading from Lower House Cottage. Public Rights of Way require confirmation of which location or locations will be used to access the compound and the mitigation measure being proposed to protect the safety of footpath users.	The access track shown on Drawing No. 80061155-01-JAC-TR3-97-DR-C-00002 is the permanent access track to the proposed valve house. The track is already in situ and used to access the existing valve house building. It would be used infrequently by light vehicles for operational purposes.	No further action required.

BO LCC 53	Footpath 1-38-FP22 passes through the proposed Lower Houses compound. Item 4.3.4 74) of the Access Statement highlights two possible diversion options for footpath 1-38-FP22. Lancashire County Council's PROW request the second option, temporary diversion of footpath 1-38-FP22 around the edge of the compound as this will cause the least amount of disturbance to users of the footpath.	Noted. This option would be taken forward as part of an application for a temporary public right of way diversion in advance of construction.	Final details to be submitted as part of an application for temporary public right of way diversion in advance of construction.
BO LCC 54	On reinstatement of the compound area the following three pieces of infrastructures, Kissing gate at the road junction Grid Ref 363867/465778, stile at wall Grid Ref 363814/465694, stile in fence line Grid Ref 363816/465572 are to be replaced with a Centrewire Woodstock Pedestrian kissing gate with mesh hoop. To mitigate against the volume of traffic accessing the compound on reinstatement of the area the private road that footpath 1-38-FP21 runs along between the compound and Park House Road is to be resurfaced. If any of the works mentioned above are unable to be delivered directly by the applicant then a developer contribution by means of a S106 Agreement should be sought to complete the improvements.	It is anticipated that the implementation of the proposed works during site reinstatement could be covered by the proposed highways agreement.	Ensure provision for the required works in the proposed highways agreement.
BO LCC 55	Public Rights of Way require additional time to assess the implications and mitigation measures required to each of the Public Rights of Ways that cross the one way traffic system. An example of PROW's concerns is that walkers accessing footpath 1-38-FP12 from 1-38-FP11 or vice versa would need to walk along the one way system which doesn't offer any safe refuge locations for users to avoid passing HGVs. A suitable mitigation measure at this location would be a temporary alternative route parallel to the road as signage on the highway would not be acceptable to ensure the safety of pedestrians.	<p>The removal of the proposed one-way system from our proposals reduces the number of interfaces between the haulage routes and public rights of way. For example, the section of Helks Brow between footpath 1-38-FP12 and 1-38-FP11 would only be used infrequently when access to the site by larger vehicles is required. HGV movements along Helks Brow would be infrequent during 18 weeks of the overall construction programme and would be undertaken in escorted convoys. Marshalls would sweep the route in advance of the convoys, ensuring any non-motorised users have left the highway before the convoy is allowed to proceed.</p> <p>Where existing PROWs meet the proposed access routes, visibility is typically unobstructed and there are existing areas that provide pedestrian refuge. To ensure conditions (visibility and space) are maintained at all such junctions United Utilities would ensure an</p>	Ensure provision for the required works in the proposed highways agreement.

		appropriate vegetation management regime is implemented as part of the proposed highways agreement.	
BO LCC 55	Conditions recommended in respect of Construction Environmental Management Plan and Precautionary Working Methods; Habitat Creation, Restoration and Management Plan; and removal of all temporary bridges, culverts haul roads, structures and features.	United Utilities support the principle of the proposed conditions but would request that these be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.	Lancaster City Council to consider use of the recommended conditions.
FOREST OF BOWLAND AONB (ECOLOGY)			
BO LCC 56	Uncertainty over the conclusions of the Habitats Regulations Assessment, which assumes approval of the application to dispose of tunnel arisings at Waddington Fell Quarry.	The planning application does not allow for disposal of arisings in any other way. If for any reason, there was a change to the strategy for disposal then a new or revised application would be required, and this would need to be accompanied by an assessment of ecological impacts.	Lancaster City Council to consider use of the recommended conditions.
BO LCC 57	SPA disturbance impacts appear to have been limited to compounds.	The proposed highway modification works have been taken account of. The scope of works assessed is described in the HRA executive summary and introduction and illustrated in the supporting plans.	
BO LCC 58	Comments relating to the submitted Biodiversity Net Gain Assessment	As outlined in the submitted reports, additional work was required on the BNG assessment. This has been undertaken and is submitted as part of the SEI. In summary: <ul style="list-style-type: none"> • BNG has been converted into Metric 3.0 • The Rivers Metric has been completed • The highways BNG has been added • The offsetting has been updated • Offsetting sites consider existing species impacts. • Metric tables couldn't be submitted on the planning portal but were sent to Lancaster City Council's ecological advisor along with GIS files. Updated versions have been 	

		prepared and can be issued to the AONB's ecological advisor if desired.	
BO LCC 59	Concerns over very high distinctiveness (VHD) habitats and veteran trees	<p>SEI Appendices B5 and B7 include a summary of VHDs within the planning boundaries and detail the potential for impacts, avoidance, mitigation, and consideration of alternatives.</p> <p>Tree loss and compensation has been calculated using the BNG metric.</p> <p>Following design refinements, details of which are included in the SEI, no veteran trees would be removed to accommodate the proposed works. The only VHDs that could be temporarily impacted are small areas at three offsite highway works locations. In addition to mitigation measures, high distinctiveness habitats have been compensated for on a 4:1 ratio.</p>	
BO LCC 60	Does BNG assume worst case?	Yes, United Utilities can confirm that the BNG Assessment assumes worst case. It assumes all 'at risk' features and habitats would be lost as a result of the development, when in reality it would be possible to further avoid and mitigate impacts through detailed design.	
BO LCC 61	Inadequate assessment of the likely ecological impacts of the proposed highway works and the necessary avoidance, mitigation, and compensation measures.	<p>Additional technical reports have been provided as part of the SEI:</p> <ul style="list-style-type: none"> • Bat trees, hedgerows and target notes • GWDTE assessment for highway modification works • No lighting proposed, no night-time traffic movements other than shift change. • No new kerbs on road widenings and no solid boundaries to haul roads. <p>It is considered that the submission of final reinstatement proposals for each highway modification location could be the requirement of a suitably worded planning condition. United Utilities would request that any condition(s) be aligned to an</p>	

		agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.	
BO LCC 62	Compensation proposals and biodiversity net gain calculations don't take into account the full impacts of the proposed highway works.	A BNG Assessment covering the proposed off-site highway modifications is submitted as part of the SEI.	
BO LCC 63	It is not clear from the information submitted with the application that there is no alternative to the proposed highway works that would result in a lower ecological impact.	The number and location of proposed highway modification works has been dictated to a large degree by highway safety considerations. Whilst discussions remain ongoing with Lancashire County Council Highways, United Utilities considers that the proposals are proportionate and strike the correct balance between ensuring highway safety and minimising biodiversity and landscape impacts. The design process included consideration of designations, which have been avoided wherever possible. In addition, the micro-siting of the highway modifications took into account the need to reduce impacts on features of ecological interest as far as possible, within the constraints dictated by highway safety requirements. The assessment in Volume 5 of the Environmental Statement, which has been updated as part of the SEI, represents a reasonable worst case and it is anticipated that the level of impact can be reduced further through detailed design. It is considered that the submission of final reinstatement proposals for each highway modification location could be the requirement of a suitably worded planning condition. United Utilities would request that the condition be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.	
BO LCC 64	Incomplete protected species surveys, which are required to inform the Environmental Impact Assessment and enable the planning authority to meet its statutory obligations	Additional survey work has been completed since the submission of the planning application, the outputs of which are included in the SEI. Supplementary information relating to the proposed highway modification works is also included in the SEI.	

BO LCC 65	Some species populations (including bats) and impacts on those populations have been evaluated in the absence of surveys. These evaluations and impact assessments are therefore unreliable	<p>The approach to assessing tree roosting bats was as consulted on in the scoping addendum.</p> <p>The assessment uses ground-level tree assessments alongside transect and static survey data and historical records to identify potential bat species present, assess potential impacts and design mitigation. There is more than sufficient scope within the proposed application to accommodate mitigation if necessary.</p> <p>Tree roost dusk/dawn surveys would be undertaken in advance of and to inform, final compound designs, which United Utilities consider could be the requirement of a suitably worded planning condition.</p> <p>There is sufficient information on impacts and mitigation (i.e., Ecological Management Plan, Lighting Strategy, Construction Code of Practice) for the Local Planning Authority to have confidence that Natural England would issue a licence if required.</p> <p>In their comments made in response to the planning application consultation, Natural England confirm that the Habitat Regulations Assessment undertaken is appropriate.</p>	
BO LCC 66	Incomplete Protected Species Presence/Absence surveys (Badgers, Barn Owl, Toads)	<p><u>Badgers (roadkill and habitat severance)</u></p> <p>No night-time traffic movements are proposed, and no lighting or solid barriers would be erected along the proposed access track to the Lower Houses compound. No badger setts in close proximity to the proposed compound were identified and repeat surveys would be carried out prior to construction in accordance with a suitably worded planning condition. Significant effects relating to badgers have been scoped out.</p> <p><u>Barn Owl (roadkill and hunting)</u></p>	

		<p>Significant effects were considered and scoped out. There would be relatively small, medium to long term temporary foraging habitat losses, however, there is significant surrounding habitat available to conclude that likely significant effects on this species can be scoped out. Additional review of baseline confirming no likely increase in risk of roadkill is included in the SEI.</p> <p><u>Toads</u></p> <p>Known crossings have been identified during the assessment.</p> <p>No night-time traffic movements are proposed, and no new kerbs are proposed as part of the highway modification proposals.</p> <p>Significant effects relating to toads have been scoped out.</p> <p>Further information is provided in the SEI.</p>	
BO LCC 67	<p>Incomplete Protected Species Presence/Absence surveys (Otter)</p> <p>Road widening location RW2 (for example) is adjacent to a watercourse where otters have previously been recorded.</p>	<p>The significant effects refer to the potential for impacts to otter populations through habitat degradation from either pollution, temporary disturbance of foraging habitats or loss of habitat connectivity in the absence of mitigation. No significant effects were identified when taking into account the proposed mitigation identified relating to the water environment (Chapter 7) and ecology (Chapter 9).</p>	
BO LCC 68	<p>Concern over scope and timing of water vole surveys.</p> <p>Additional water vole surveys were undertaken by RSK in 2020 and 2021, which identify evidence of water vole at the Lower Houses compound. I encountered the results of these surveys within the otter survey appendices (submitted to Ribble Valley Borough Council with HARP planning application 2021/0660). These results include evidence of water voles (including burrows and feeding signs) in locations that would be affected by the proposed development, including the Lower Houses compound</p>	<p>The results of surveys on watercourses relevant to the activities assessed as part of the main ES Chapter 9 have been included in the ES Chapter 9B, including RSK Biocensus and Bowland Ecology survey reports. Additional surveys of watercourses associated with the proposed areas of road widening and passing places were undertaken and used in the assessment.</p> <p>The potential water vole evidence identified in the Appendix 9B.3 and RSK biocensus TR3 Otter and Water Vole survey report Appendix, as identified in the report, is not considered to be</p>	

	<p>and vicinity. These results and likely associated impacts do not appear to have been addressed within the relevant ES chapters. A licence from Natural England is likely to be required before works affecting water voles and their burrows could commence.</p> <p>It is acknowledged within the RSK water vole report that not all surveys were undertaken during the appropriate survey season.</p> <p>Before the application is determined:</p> <ul style="list-style-type: none"> • All necessary water vole surveys need to be completed in accordance with recognised guidelines. • The ecological impact assessment needs to be updated to take into account the RSK water vole survey results and any necessary further surveys. • Necessary measures to avoid, minimise and compensate for impacts on water voles and their habitat need to be given in the ES, including details of any licencing requirements. 	<p>evidence of water voles but highly likely to be attributable to bank vole or brown rat based on the size and of burrows, feeding remains, droppings identified and absence of definitive evidence of water vole at all surveyed watercourses within the relevant catchments.</p> <p>The watercourses identified in the ES Chapter 9 as having activities which would require works in channel or bank side vegetation clearance and hence could impact water voles if present were generally unsuitable or had low suitability. This, in combination with the lack of evidence of water voles at all watercourses surveyed in the wider catchments, indicates that water voles are highly unlikely to be present and as such no licensable activities for water voles are associated with the Proposed Scheme.</p> <p>The surveys identified as having suboptimal timings were habitat suitability surveys only. These surveys identified that the watercourses were generally unsuitable or low suitability for water voles in areas where direct impacts to these habitats could occur and hence did not require further surveys.</p>	
BO LCC 69	<p>Insufficient information to demonstrate that the mitigation hierarchy has been applied to all elements of the scheme in accordance with the requirements of the NPPF.</p>	<p>Information on the iterative approach to scheme design, considering all environmental topics and engineering feasibility to apply the mitigation hierarchy has been provided and discussed throughout the pre-application consultation, is presented within Chapter 3 of the ES and further information is included in Chapter 9 of the ES. Approaches include:</p> <ul style="list-style-type: none"> • Careful selection of works locations, avoiding habitat loss and impact on designations wherever possible, taking into account the requirement for works to be carried out in certain locations due to proximity to existing infrastructure or to ensure highway safety (regarding the location of proposed highway modifications) • Red line boundaries have been drawn to exclude features where possible. 	

		<ul style="list-style-type: none"> Firm commitments are made to retain some features within red line boundaries Firm commitments are made to execute the works in a manner which mitigates potential impacts, as set out in the Mitigation Schedule and Construction Code of Practice 	
BO LCC 70	There is uncertainty over the extent of habitat loss, and therefore also uncertainty over the likely impacts on protected and priority species and their habitat.	A reasonable worst-case scenario has been adopted and mitigation proposals developed on that basis. The assessment only assumes habitat retention when it is certain and is committed to in the application. Residual habitat losses would be compensated for through the implementation of on and off-site biodiversity net gain strategies.	
BO LCC 71	Absence of an arboricultural assessment for the proposed highway works and Wray compound	<p>Supplementary arboricultural survey data in relation to the proposed offsite highway modifications is included as part of the SEI.</p> <p>The selection of proposed highway modification works has been dictated to a large degree by highway safety considerations. Notwithstanding this, the micro-siting of the highway modifications took into account the need to reduce impacts on trees as far as possible, within the constraints dictated by highway safety requirements. The assessment in Volume 5 of the Environmental Statement, which has been updated as part of the SEI, represents a reasonable worst case and it is anticipated that the level of impact can be reduced further through detailed design. It is considered that the submission of final reinstatement proposals for each highway modification location could be the requirement of a suitably worded planning condition.</p> <p>A table summarising the arboricultural features to be removed, or at risk of removal is presented as part of the SEI. The numbers presented account for impacts associated with the inclusion of additional proposed offsite highway modification works on Eskew Lane and at the junction of Spen Brow and Furnessford Road.</p>	

BO LCC 72	There is uncertainty over the feasibility of mitigation/compensation for some of the predicted ecological impacts.	Where there is uncertainty in mitigation this is stated, and the assessment assumes reasonable worst case. Where compensation is proposed this is described after residual effects.	
BO LCC 73	Inconclusive offsite Great Crested Newt (GCN) eDNA result	Appendix B5 of the SEI confirms there are no positive or inconclusive eDNA results for ponds within 500m.	
BO LCC 74	Licensing tests for Bats, Otter and GCN	<p>There is sufficient information on impacts and mitigation (i.e., Ecological Management Plan, Lighting Strategy, Construction Code of Practice) for the licensing tests to be met and for the Local Planning Authority to have confidence that Natural England would issue a licence if required.</p> <p>In their comments made in response to the planning application consultation, Natural England confirm that the Habitat Regulations Assessment undertaken is appropriate.</p>	
BO LCC 75	Conditions recommended in respect of Construction Environmental Management Plan and Precautionary Working Methods; Habitat Creation, Restoration and Management Plan; and removal of all temporary bridges, culverts haul roads, structures, and features.	United Utilities would support the use of the recommended conditions.	
FOREST OF BOWLAND AONB (LANDSCAPE)			
BO LCC 76	Require detailed tree survey/arboricultural assessment of the areas affected by the offsite highway works or the Wray satellite compound	Supplementary arboricultural survey data is included as part of the SEI.	Lancaster City Council to consider use of the recommended conditions.
BO LCC 77	Inconsistency in number of trees lost or affected. Provide table summarising a) veteran trees. b) ancient trees. c) other tree categories.	A table summarising the arboricultural features to be removed, or at risk of removal is included as part of the SEI. The numbers presented account for impacts associated with the inclusion of additional proposed offsite highway modification works on Eskew Lane and at the junction of Spen Brow and Furnessford Road.	

BO LCC 78	How can the LPA be sure that the worst-case scenario has been considered?	The red line areas shown on the Site Location Plan have been drawn on a conservative basis to ensure that all necessary permanent and temporary works can be implemented without the need for additional works outside of the proposed boundaries. The arboricultural impact assessment adopts a conservative approach in respect of loss of features within the redline boundary and full reinstatement following the principles set out in Volume 5 and Chapter 6 The LVIA.	
BO LCC 79	The AIA does not address notable trees and other trees of special interest	Supplementary arboricultural survey data is included as part of the SEI. Following design refinements, details of which are included in the SEI, no veteran trees would be removed to accommodate the proposed works.	
BO LCC 80	Need to demonstrate that all reasonable options for avoidance and retention have been exhausted	See responses to BO LCC 59, BO LCC 61 and BO LCC 63.	
BO LCC 81	What information the applicant has provided with the planning application on the off-site highway works lacks detail and as indicated above has not even been informed by critical survey work such as an arboricultural survey which undermines the validity of assumptions the applicant has made. The number of trees that may be affected by the off-site highway works is a concern and with this in mind it would not be appropriate to determine the planning application without tree specific information on losses, crown raising, pruning, etc.	Supplementary arboricultural survey data in relation to the proposed offsite highway modifications is included as part of the SEI. The selection of proposed highway modification works has been dictated to a large degree by highway safety considerations. Notwithstanding this, the micro-siting of the highway modifications took into account the need to reduce impacts on trees as far as possible, within the constraints dictated by highway safety requirements. The assessment in Volume 5 of the Environmental Statement, which has been updated as part of the SEI, represents a reasonable worst case and it is anticipated that the level of impact can be reduced further through detailed design. It is considered that the submission of final reinstatement proposals for each highway modification location could be the requirement of a suitably worded planning condition.	

		A table summarising the arboricultural features to be removed, or at risk of removal is presented as part of the SEI.	
BO LCC 82	Unable to fully explain to the AONB Joint Advisory Committee the precise reasons why certain sites have been selected, which ones were ruled out and why and, whether the chosen sites are optimal in landscape and visual terms.	<p>Appendix A of our Planning, Design and Access Statement submitted in support of the application sets out the policy requirements of the Major Development Test in respect of works proposed in an AONB and provides an assessment of the Proposed Bowland Section against these requirements.</p> <p>Regarding the Lower Houses compound, the location is constrained by the need to connect onto the existing aqueduct. We have sought to make connections as near as possible to the existing aqueduct to minimise the disturbance and environmental impact associated with lengthy sections of open cut pipework. The compound would be a prominent feature in landscape and visual terms, so the landscape work has focussed on avoidance of features and the undertaking a of thorough landscape and visual assessment so that the impacts are well understood. All areas would be reinstated to their original use and features reinstated as existing.</p> <p>In consultation with LCC Highways, the site selection process for the Wray Satellite compound was primarily driven by the need to identify a location with sufficient space, adjacent to the main route from the M6 and close enough to both haulage routes for logistics reasons. The nearest site outside of the AONB is approximately 8km to the west and would be too far away to allow for effective marshalling of vehicles along routes 1 and 2. The location selected is adjacent to the B6480 and would involve minimal disturbance to existing landscape features.</p> <p>Further explanation is provided in Section 4 of the Main SEI Report.</p>	
BO LCC 83	Programme - further clarity required	United Utilities note that a condition has been recommended in respect of the submission and approval of a detailed phasing plan	

		in advance of commencement. We would support the use of the recommended condition, which would be discharged at the appropriate time prior to the commencement of the development.	
BO LCC 84	Multi-line to multi-line connection - were any landscape and visual factors considered during the analysis and assessment of the two options and, which of them would likely be more acceptable in landscape terms taking account of site location, visibility, opportunities for mitigation, etc?	The multi-line to multi-line is the reasonable worst-case option and has been assessed as such for the landscape and visual assessment. As the multi-line to multi-line connection would be undertaken near the tunnel shaft and directly following the tunnelling phase, the area of land required for the connection would be within the main working compound and already subject to disruption including soil stripping and other construction activity. This would be true for whichever option were selected. The commissioning phase would prolong construction by a few months which is a short duration in comparison to the tunnelling phase. The land would be returned to its original use after the commissioning phase.	
BO LCC 85	Decommissioning - unclear whether any sections of the decommissioned aqueduct would be removed or brought into some form of commercial use. Require more information on the future proposals for use/removal/abandonment/mothballing of the decommissioned aqueduct.	There would be no new features and no landscape and/or visual effects.	
BO LCC 86	To minimise environmental impacts, the following replacement planting numbers which fully reflect the importance and landscape/biodiversity/cultural value of those lost are recommended: <ul style="list-style-type: none"> • Ancient, veteran, notable and other trees of special interest – between 30 and 300 trees for each one lost. • Ancient woodland – 30 hectares of woodland planting for every hectare lost. 	Following design refinements, details of which are included in the SEI, no veteran trees would be removed to accommodate the proposed works. No areas of ancient woodland would be affected by the proposed works.	

BO LCC 87	Topsoil storage height should be limited to height of 1m with an absolute maximum of 2m should be used for stockpiled topsoil and subsoil.	United Utilities note that a condition has been recommended requiring that the height of topsoil and subsoil storage mounds be limited to 2m. We would support the use of the recommended condition, which would be adhered to throughout the development.	
BO LCC 88	Off-site highway works, Wray satellite compound and temporary Wray alternative residents' parking area have not been included in Volume 2 Ch 6	<p>An assessment of off-site highway works, Wray satellite compound and temporary Wray alternative residents' parking area was included in Volume 5 of the Environmental Statement.</p> <p>The landscape and visual assessment of components comprising the off-site highways works, including the Wray satellite compound and Wray alternative residents parking, has been undertaken fully in accordance with Appendix 6.1. The Landscape and Visual Impact Assessment Methodology. As with volume 2 Ch.6 LVIA site visits were undertaken at all locations to consider the impacts. Design advice was provided where, within the constraints of the site locations, avoidance of features would help reduce temporary or permanent effects. It was agreed with Planning Officers at Lancaster City Council that a summarised approach to reporting would be appropriate at this earlier stage of design and is based on a worst case of loss of features within the redline boundary and full reinstatement following the principles set out in Volume 5 and Volume 2 Chapter 6.</p>	
BO LCC 89	LCTs have been excluded from this assessment due to their broader geographical extent and occurrence across multiple geographical locations - Disagree with this approach	In accordance with the guidelines in GLVIA3 the exclusion of LCTs is considered a proportionate approach given the limited range of the significant effects and the temporary nature of the Proposed Scheme. If the effects were more far reaching and permanent, we would agree but, in this case, the approach we have adopted is considered to be proportionate.	
BO LCC 90	Disagrees that effects at 15 year are imperceptible	The assessment has followed the principle of the Landscape Magnitude of Effects criteria. The new valve house building would be a permanent new structure, in a scale similar to the existing building and clad with a natural stone in keeping with the local	

		vernacular. The building would result in a slight permanent change to the existing landscape elements on a very small proportion of the landscape character area. The buildings therefore, could be considered to have a slight adverse significance of effect or a negligible effect. However, the residual effects are not considered significant.	
BO LCC 91	Insufficient landscape assessment in respect of off-site highway works	The landscape and visual assessment of components comprising the off-site highways works, including the Wray satellite compound and Wray alternative residents parking, has been undertaken fully in accordance with Appendix 6.1. 'The Landscape and Visual Impact Assessment Methodology'. As with Volume 2, Chapter 6, LVIA site visits were undertaken at all locations to consider the impacts. Design advice was provided where, within the constraints of the site locations, avoidance of features would help reduce temporary or permanent effects. It was agreed with Planning Officers at Lancaster City Council that a summarised approach to reporting would be appropriate at this earlier stage of design and is based on a worst case of loss of features within the red line boundary and full reinstatement following the principles set out in Volume 5 and Volume 2, Chapter 6 of the Proposed Bowland Section ES.	
BO LCC 92	Incorrect compound name - Lower Cross	Noted.	
BO LCC 93	Appearance of hoarding needs to be in keeping	United Utilities note that a condition has been recommended requiring that the final specification of site hoarding be agreed by the Local Planning Authority prior to erection. We would support the use of the recommended condition, which would be discharged prior to the commencement of the development.	
BO LCC 94	Lower Houses landscaping - sections required	United Utilities note that a condition has been recommended requiring sections to be submitted for approval in writing by the Local Planning Authority. We would support the use of the	

		recommended condition, which would be discharged prior to the commencement of the development.	
BO LCC 95	How was valve house building location selected? The building would have slight adverse visual impact rather than negligible	The location of the proposed valve house building is constrained by the interface between the new and replaced sections of aqueduct. The new valve house building would be a permanent new structure, in a scale similar to the existing building and clad with a natural stone in keeping with the local vernacular. The building would result in a slight permanent change to the existing landscape elements on a very small proportion of the landscape character area. The building therefore, could be considered to have a slight adverse significance of effect or a negligible effect. However, the residual effects are not considered significant.	
BO LCC 96	Assessment of inter-project effects unclear in terms of landscape impacts	<p>An assessment of inter-project cumulative effects is included in Volume 2 Chapter 6 of the ES. No inter project effects have been identified.</p> <p>The assessment also considers intra project cumulative effects (i.e., within the Bowland and Marl Hill Sections and wider HARP programme).</p> <p>Section 5 of the SEI Report reappraises the cumulative environmental effects of the Proposed Bowland Section, compared with the cumulative assessment presented in Volume 2 of the June 2021 Environmental Statement.</p>	
BO LCC 97	Cumulative effects - tree loss - based on 'at risk' assessment i.e., not worst case? Also, how does the assessment consider cumulative effects?	The assessment assumes 'at risk' features would be lost in order to ensure a reasonable worst-case assessment and to inform adequate mitigation. Notwithstanding this, every effort would be made to retain 'at risk' features wherever possible in accordance with the mitigation hierarchy. It is considered that the submission of final designs and reinstatement proposals for each highway modification location could be the requirement of a suitably worded planning condition.	

BO LCC 98	Offsite highways landscape impacts should not have been treated differently to landscape and should have been assessed in Vol 2	The landscape and visual assessment of components comprising the off-site highways works, including the Wray satellite compound and temporary Wray alternative residents parking area, has been undertaken fully in accordance with Appendix 6.1. (The Landscape and Visual Impact Assessment Methodology). As with Volume 2 Chapter 6, site visits were undertaken at all locations to consider the impacts. Design advice was provided where, within the constraints of the site locations, avoidance of features would help reduce temporary or permanent effects. It was agreed with Planning Officers at LCC that a summarised approach to reporting would be appropriate at this earlier stage of design and is based on a worst case of loss of features within the redline boundary and full reinstatement following the principles set out in Volume 5 and Volume 2 Chapter 6 of the Proposed Bowland Section ES.	
BO LCC 99	It is likely that the extent of the construction areas and construction easements assessed in this report may be greater than will be required	The statement seeks to confirm that a reasonable worst-case assessment has been undertaken i.e., we consider it likely that the effects can be further reduced through detailed design but no additional land take outside the red line boundary would be required to facilitate the works.	
BO LCC 100	Offsite highways works figures in Vol 5 not suitably detailed	<p>The figures presented in Volume 5 of the ES are considered to be suitably detailed to establish the potential for likely significant effects and to inform appropriate mitigation. It was agreed with Planning Officers at Lancaster City Council that a summarised approach to reporting would be appropriate at this earlier stage of design and is based on a worst case of loss of features within the red line boundary and full reinstatement following the principles set out in Volume 5 and Volume 2 Chapter 6 of the Proposed Bowland Section ES.</p> <p>Supplementary arboricultural survey data in relation to the proposed offsite highway modifications is included as part of the SEI.</p>	

		It is considered that the submission of final designs, accompanied by tree protection plans, arboricultural method statements and reinstatement proposals for each highway modification location could be the requirement of a suitably worded planning condition.	
BO LCC 101	Comments on CCoP	United Utilities note that a condition has been recommended requiring the preparation of a detailed Construction Environmental Management Plan (CEMP) for submission to the Local Planning Authority. We would support the use of the recommended condition, which would be discharged prior to the commencement of the relevant works phase to which the CEMP relates. It is considered that comments made in respect of the Construction Code of Practice could be addressed during the preparation of the CEMP.	
BO LCC 102	Comments on Volume 4 Appendix 20.2: Planting Proposals	<p>New planting would be grown from native seed sourced from an appropriate seed zone.</p> <p>Regarding the inclusion of Scots Pine in the Planting Proposals, following discussions with our arboriculturalist, it is understood that the greatest risk of Dothistroma Needle Blight spreading is within large plantations of Scots pine. Mixed and diverse planting with Scots pine as a small ratio limits the risk. The mixes have been discussed with project Ecologist and Arboriculturalist and are found within the study area and provides natural diversity.</p> <p>The removal of hedgerows has been avoided wherever possible. Removed hedgerows that are considered ordinary, i.e., do not fall within the criteria for Important hedgerows within the 'Hedgerow Regulations 1997', would be replanted with a species mix that provides a greater diversity. No Important hedgerows would be impacted by the works proposed in this planning application.</p> <p>Appendix 20.2 'Planting Schedules' has been updated to include provision for cell grown stock.</p>	

		United Utilities note that a number of conditions have been recommended by the AONB's Landscape Advisor, one of which includes the preparation and submission of further information regarding planting proposals. United Utilities support the principle of the proposed conditions being imposed but would request that these be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.	
BO LCC 103	Planting around valve building should be proposed	Planting around the new valve house building is constrained by the presence of / proximity to below ground apparatus. Trees and hedgerows are proposed where considered in keeping with the landscape character. Our strategy has been to ensure the structures are typical in appearance to agricultural out-buildings present throughout the local area and thus in keeping with the landscape character.	
TATHAM PARISH COUNCIL			
BO LCC 104	<p>Thank you for inviting Tatham Parish Council to comment upon this planning application. The application was considered at the Full Parish Council meeting held on Tuesday 20th July 2021.</p> <p>The Parish Council recognises the necessity of these works for the continued provision of clean drinking water and that the works cannot possibly be undertaken without some disruption to local communities.</p> <p>The Parish Council is not clear, and therefore seeks clarification, on the following points:</p> <p>1) Will the proposed one-way traffic system, in the parish, cease or remain in force outside the indicative working hours (i.e., in the evenings and at weekends)?</p>	<p>In recognition of concerns raised regarding the impact that the imposition of a one-way system would have in terms of disruption to local residents and businesses, the one-way system no longer forms part of our proposals. Instead, construction traffic would both access and egress the site via the B6480, Eskew Lane, Long Lane, Spen Brow and Furnessford Road. To facilitate this approach, an 'access only' road closure along Furnessford Road is proposed, with movement of construction traffic limited to one-way. Intermediate holding areas are now proposed at the junction of Spen Brow and Furnessford Road to allow vehicles travelling south towards the site to be held before being cleared to proceed on the basis that no vehicles, including HGVs leaving the Lower Houses compound and local traffic are travelling north along Furnessford Road.</p> <p>A community liaison officer would be appointed to act as a point of contact for community engagement prior to the</p>	United Utilities to appoint a community liaison officer to act as a point of contact for community engagement.

	2) How can/will the Parish Council be enabled to participate in the proposed ongoing 'Community Engagement Group' and also the 'Stakeholder Group'?	commencement of the enabling works and during the construction phase. We would ensure the community liaison officer maintains dialogue with the Parish Council throughout the pre-construction and construction period and ensures the active participation of members in the Community Engagement Group.	
WENNINGTON PARISH COUNCIL			
BO LCC 105	<p>Road Safety</p> <p>WPC are concerned that the risks raised in the NDP have not been given sufficient consideration in the Construction Traffic Management Plan</p> <p>WPC consider that there is a lack of detail as to alternative routes considered and the reasoning for discounting the options to reduce environmental impact on Route Two.</p> <p>WPC are concerned, given the lack of pedestrian pavements and footpaths providing alternative routes, that there is little evidence of mitigation at the single-track road on the B6480 at Wennington supporting Route two.</p> <p>We support the reduction of speed limits from 50mph to 30mph on the B6480.</p> <p>While WPC welcome the proposal to lower the 50mph speed limit along the B6480 to 30mph, we remain concerned that the 30mph restriction through the village and single-track road remains unaltered. Furthermore, the existence of a proposal to lower the 50mph speed limit along the B6480 outside of the village to 30mph demonstrates a recognition existing within the planning, that HGV's need to be driving more slowly along narrow country lanes. It is a logical deduction therefore, that if 50mph is to be reduced to 30mph then traffic passing through a village with the</p>	<p>Road Safety</p> <p>Volume 4 Appendix 3.1 of the Proposed Bowland Section ES describes the alternative construction traffic access routes considered during the design process, including reasons for selection of the proposed routes.</p> <p>Please refer to BO LCC 33 above for further details of the alternative routeing strategy now proposed.</p> <p>Construction traffic associated with the proposed scheme would be limited to 20 mph when travelling through Wennington, as confirmed in the LCC Bowland February 2022 CTMP. An advisory 30mph speed limit would be put in place elsewhere along the haulage route. The speed of construction vehicles would be monitored in accordance with the measures outlined in the LCC Bowland February 2022 CTMP and signage urging other road users to take extra care when approaching the compound junctions would be erected. Other traffic management measures, such as signal controls, are not proposed in the village.</p> <p>The LCC Bowland February 2022 CTMP provides detail relating to traffic management proposals at 'the narrows' in Wennington. The proposals comprise a priority passing system, controlled through the implementation of 2 no. give ways, which would ensure the safe movement of vehicles through 'the narrows'.</p>	<p>United Utilities to appoint a community liaison officer to act as a point of contact for community engagement.</p>

<p>narrowest point on Route 2, should be subjected to a reduction from 30mph to 20mph at the very least.</p> <p>WPC recommend that the speed limit through the village is permanently reduced to 20mph (See also a submission to Highways from Lancashire County Councillor for this area, namely Matthew Maxwell-Scott (Appendix A)).</p> <p>WPC propose improved signage, road markings and the introduction of appropriate traffic calming measures on the B6480 from the junction with Lodge Lane and Spout Lane Wennington.</p> <p>WPC do not support the introduction of traffic control measures as we consider this would cause excessive disruption for residents wishing to enter and exit the village, and critically would increase both noise and air pollution due to stop-start traffic.</p> <p>WPC recommend that an alternative route for pedestrians, avoiding 'The Narrows', reinstating an historic route, utilising the Parish Council owned land running behind the properties abutting the River Wenning is scoped and considered for construction as part of the scheme. This would significantly remove risks to pedestrians, both during the scheme and beyond, providing safe egress from the village and access to the adjacent woodland, would support reinstatement of the riverbank and enhance the amenity value of the village.</p> <p>Health, Safety and Wellbeing</p> <p>WPC request that further assessment of potential impacts to public health, safety and wellbeing is carried out.</p> <p>WPC request that clear mitigation measures are put in place to address those risks and impacts.</p>	<p>The Parish Council's request for a historic route for pedestrians abutting the River Wenning to be reinstated is noted. Whilst the reinstatement of this route is not proposed as part of the planning application, we would remain in close dialogue with the Parish Council to explore opportunities to support the reinstatement of the footpath as a legacy benefit of the proposed scheme.</p> <p>Health, Safety and Wellbeing</p> <p>Volume 2 Chapter 14 of the ES includes an assessment of the likely disturbance and health effects of HGVs travelling along the proposed haulage routes. No significant effects are expected on traffic volume, severance, driver delay or pedestrian delay for either route within the Wennington community area.</p> <p>A road safety audit would be carried out and United Utilities commits to implementing the findings of the audit in accordance with the requirements of a suitably worded planning condition. United Utilities would request that the condition be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.</p> <p>In addition, a Highway Stakeholder Group and Community Engagement Group would be set up to discuss the management of construction traffic to the respective compounds. Bespoke training would be provided specific to each route with identified pinch points and mitigation agreed accordingly with the primary focus being on ensuring the safety of other road users, particularly non-motorised users.</p> <p>As confirmed in Volume 2 Chapter 17 of the ES, a noise and vibration monitoring and control strategy would be agreed between the construction contractor and Lancaster City Council before commencement of enabling works. The agreed strategy would be included within the Environmental Controls Plans and</p>	
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	<p>WPC recommend that active monitoring is put in place to assess noise, vibration and air quality pre, during and post scheme to inform mitigation measures and enable additional measures to be taken if impacts prove to be more significant than anticipated.</p> <p>WPC recommend that an opportunity should be taken to provide safe and accessible routes for cyclists.</p> <p>Hours of Working</p> <p>WPC support the proposal to exclude HGV movement on Routes 1 and 2 during school drop off and pick up hours.</p> <p>WPC ask that further restrictions on all HGV activity are fully considered on the basis of Health, Safety and Wellbeing; e.g. constraining all HGV activity before 09.00 and after 17.00.</p> <p>Community Engagement</p> <p>WPC request that Parish Councils are specifically included in the consultation process as well as local community representatives</p> <p>WPC request direct engagement and involvement in the monitoring process with access to reports and data in order to scrutinise performance and compliance</p> <p>Environmental Impact</p> <p>WPC request that a more comprehensive Environmental Impact Assessment is carried out, assessing more fully the local species and habitats, risks and mitigation measures</p> <p>WPC request that a detailed action plan to deliver both environmental net gain, and net Zero carbon emissions across the HARP scheme is clearly set out</p>	<p>implemented throughout the course of construction. In respect of air quality, the detailed dispersion modelling results indicate that emissions to air from the diesel generators and additional road traffic are unlikely to result in any significant air quality effects at human locations and air quality monitoring during construction is not proposed.</p> <p>Appropriate surveys of all structures potentially impacted by the proposed scheme would be carried out to inform the Contractor's detailed design and the submission of any findings, in addition to details of any necessary remedial works, would be covered in the proposed highways agreement.</p> <p>Hours of Working (HGV movements)</p> <p>HGV movements would be limited to between 08:15 to 18:45 Monday to Friday and on Saturdays between 08:00 to 13:00. Within these hours, the following timing restrictions are proposed to avoid conflict with school drop off and pick up times:</p> <ul style="list-style-type: none"> no movement of heavy goods vehicles on Route 2 between the hours of 08:45 to 09:30 and 14:30 to 15:15 Monday to Friday no movement of heavy goods vehicles on Route 1 between the hours of 08:15 to 09:00 and 15:00 to 15:45 Monday to Friday <p>There would be no HGV movements on Sundays or Public Holidays.</p> <p>The proposed hours would allow an even distribution of deliveries throughout the day to avoid excessive hourly demand. The contractor would be responsible for managing the daily demand for deliveries and exports for their own fleet and that of their supply chain partners to ensure they comply with agreed daily traffic profiles.</p>	
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	<p>WPC request that they are actively engaged as part of the planning process to develop a range of community enhancement projects to mitigate the impacts of the scheme, compensate parishioners for the necessary disruption and support the schemes sustainability objectives to enhance the environment and public wellbeing</p>	<p>Community Engagement</p> <p>A community liaison officer would be appointed to act as a point of contact for community engagement prior to the commencement of the enabling works and during the construction phase. We would ensure the community liaison officer maintains dialogue with the Parish Council throughout the pre-construction and construction period and ensures the active participation of members in the Community Engagement Group.</p> <p>Environmental Impact</p> <p>A significant number of species-specific ecology surveys have been carried out to inform the EIA and further details regarding the scope of survey work is provided in the topic specific chapters in Volumes 2, 5 and 6 of the Environmental Statement with accompanying survey reports provided in Volume 4.</p> <p>A biodiversity net gain offsetting strategy, which takes into account the impact of the proposed off site highway modifications, has been produced. The implementation of the offsetting strategy would ensure biodiversity net gain over a minimum period of 30 years is delivered as a result of the proposed development.</p> <p>There would be no requirement for energy-consuming pumping plant or machinery under normal day-to-day operating conditions, and consequently there would be no significant carbon emissions associated with treated water supply. It is acknowledged, however, that HARP would give rise to direct and indirect carbon emissions associated with the enabling works, construction activities, materials usage, and commissioning of the infrastructure before it enters use. The main sources of carbon emissions would include transport and road haulage of surplus materials, the use of diesel generating sets at the construction compounds, and concrete and steel usage in the shafts and tunnel segments.</p>	
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HORNBY PARISH COUNCIL			
BO LCC 106	<p>Junction 1 – where the B6480 meets the A683 - It is believed from the application that UU intend to widen the junction on the B6480 where it meets the A683. However, HFPC do not feel this alone is adequate. Stop signs and road markings forcing people to stop is needed here. It would also be incredibly important that UU instruct the drivers of the waggons to stop as poor visibility could mean both motor bikes and cyclists could be unseen.</p> <p>Junction 2 - Butt Yeats crossroad - Currently this is already a very dangerous crossroad. Drivers need to be extremely careful when pulling out of Station Road and Moor Lane as visibility is extremely poor due to the narrowness of the road and the bends in both directions. Visibility is essentially blind. Currently there is a stop sign, but road markings desperately need to be added. Currently the surface of the road is deemed unsuitable to add road markings to, thus UU need to consider improving the road surface in this area to add road markings.</p> <p>Speed restriction - The B6480 is an incredibly fast road. HFPC request that a speed restriction of 30 mph is applied to this road. The restriction should be from the A683 to the village of Wray so that it incorporates Butt Yeats crossroads and all pinch points.</p>	<p>Our proposals include for a reduction in the prescribed speed limit to 40 mph along the B6480 from the junction of the B6480 with the A683 to the existing 30 mph limit in Wray. Additionally we would extend the existing advisory 30 mph speed limit bends adjacent to Lunesdale Court through to the existing 30 mph limit in Wray in both directions. All construction traffic would be required to comply with advisory speed limits. Signage would also be erected urging other road users to take extra care when driving along the route. These measures are considered sufficient mitigation for the anticipated impact of construction. The proposed mitigation would be subject to continuous monitoring and review (see Section 7 of the CTMP) and in light of any identified issues, additional measures would be developed and implemented as necessary, in accordance with the proposed highways agreement.</p> <p>A road safety audit would be carried out and United Utilities commits to implementing the findings of the audit in accordance with the requirements of a suitably worded planning condition. United Utilities would request that the condition be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.</p>	<p>United Utilities to appoint a community liaison officer to act as a point of contact for community engagement.</p>

	<p>The B6480 between the A683 and Wray is extremely narrow with many bends and pinch points. It is already an extremely dangerous road where many accidents and close encounters have already occurred. There are several points along the road that are far too narrow for large vehicles to pass safely. Pinch points can be found around bends in the roads, where near misses are regular when fast moving traffic encounter slow / static traffic when large vehicles are passing each other. HFPC encourage UU to consider consistent reminders of the speed restrictions along this road to encourage motorists to maintain a reduced speed of 30 mph perhaps with light boxes with the speed of the vehicle when approaching the pinch points.</p> <p>The road surface needs to be greatly improved and continually monitored once work begins. Due to the narrowness of the roads, often cars and larger vehicles such as busses and lorries are forced to use the grass verges to allow safe passage for the other vehicle. This has in turn resulted in deterioration of the edge of the roads with dangerous potholes appearing which will need attending to before any work is begun.</p> <p>Residents of Lunesdale Court currently walk along the B6480 into the centre of Hornby to access amenities such as the doctor's Surgery, Village Shop, Post Office and to catch busses etc. The increased volume of traffic and size of vehicles will directly impact residents within the parish as they will no longer be able to walk along the B6480. Therefore, due to this it is essential that UU provide a safe path for pedestrians from Lunesdale Court into Hornby Village. Without a footpath there will be absolutely no way for residents of Lunesdale Court to walk to Hornby when you consider the increased traffic and size of vehicles. Ideally a path created will be suitable for pedestrians, push bikes and wheelchair users.</p> <p>Heavy Vehicles impact for residents UU advise in the planning application that large waggons shall be traveling along the B6480</p>	<p>Where constrictions are present it is evident that when HGVs currently meet at such points, having travelled beyond a point where an informal contraflow can be established, they pass by overrunning the road edge rather than reversing. The current proposals would not completely eliminate the possibility of this happening, but they would reduce the risk associated with it, through:</p> <ul style="list-style-type: none"> • The implementation of an extensive programme of driver training and public engagement; and • The implementation of a proactive scheme of monitoring and maintenance in order to intervene before any road formation issues escalate as a consequence of any overrun. The highway agreement would include a requirement for the implementation of such a scheme, in consultation with the Highway Authority. <p>The highway agreement would also provide for proactive monitoring and maintenance of the surface and condition of roads used by HGVs to ensure that any wear and tear attributable to increased use by HARP construction traffic is promptly addressed.</p> <p>The LCC Bowland February 2022 CTMP incorporates further consideration of non-motorised users (see Figure C-2-01, Figure C-2-13 and Figure C-2-32). Where existing PRowS meet the proposed access routes, visibility is typically unobstructed and there are existing areas that provide pedestrian refuge. To ensure conditions (visibility and space) are maintained at all such junctions United Utilities would ensure an appropriate vegetation management regime is implemented as part of the proposed highways agreement.</p> <p>As confirmed in Volume 2 Chapter 17 of the ES, a noise and vibration monitoring and control strategy would be agreed between the construction contractor and Lancaster City Council before commencement of enabling works. The agreed strategy</p>	
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	<p>from 7am to 7pm, Monday – Saturday. This will have considerable impact on residents due to increased noise, volume of traffic and vibrations.</p> <p>a. Traffic – the B6480 is particularly busy between 7:30 – 8:30am. With the increase in traffic of larger vehicles it will increase the risk to drivers.</p> <p>b. Noise – the increase in large waggon will undoubtedly cause increased noise and disturbance to residents along the B6480. To ease the noise and traffic disturbance to residents UU need to consider restricting the large vehicles between the hours of 9am – 6pm opposed to 7am – 7pm.</p> <p>c. Vibrations – vibrations can already be felt in some houses off the B6480.</p> <p>There is concern that the increased volume of heavy vehicles, particularly at Butt Yeats could cause serious structural damage to certain houses. UU need to consider the long-term effects of the heavy vehicles for these residents.</p>	<p>would be included within the Environmental Controls Plans and implemented throughout the course of construction. In respect of air quality, the detailed dispersion modelling results indicate that emissions to air from the diesel generators and additional road traffic are unlikely to result in any significant air quality effects at human locations and air quality monitoring during construction is not proposed.</p> <p>HGV movements would be limited to between 08:15 to 18:45 Monday to Friday and on Saturdays between 08:00 to 13:00. Within these hours, the following timing restrictions are proposed to avoid conflict with school drop off and pick up times:</p> <ul style="list-style-type: none"> • no movement of heavy goods vehicles on Route 2 between the hours of 08:45 to 09:30 and 14:30 to 15:15 Monday to Friday • no movement of heavy goods vehicles on Route 1 between the hours of 08:15 to 09:00 and 15:00 to 15:45 Monday to Friday <p>There would be no HGV movements on Sundays or Public Holidays.</p> <p>The proposed hours would allow an even distribution of deliveries throughout the day to avoid excessive hourly demand. The contractor would be responsible for managing the daily demand for deliveries and exports for their own fleet and that of their supply chain partners to ensure they comply with agreed daily traffic profiles.</p> <p>Appropriate surveys of all highway structures potentially impacted by the proposed scheme would be carried out to inform the Contractor's detailed design and the submission of any findings, in addition to details of any necessary remedial works, would be covered in the proposed highways agreement. Other buildings with the potential to be impacted by the proposed works would be</p>	
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		subject to a condition survey before, during and after the works. Copies of the condition reports would be made available to property owners and any issues identified and deemed to have been caused by the proposed development would be rectified.	
BENTHAM TOWN COUNCIL			
BO LCC 107	<p>Bentham Town Council request that: -</p> <ol style="list-style-type: none"> 1. They are kept updated regarding the programme. 2. Consideration be given to Bentham residents during the work, in particular that the traffic management should ensure that other road users are not disadvantaged. 3. If the application is subject to change then please re-consult with Bentham Town Council. 	A community liaison officer would be appointed to act as a point of contact for community engagement prior to the commencement of the enabling works and during the construction phase. We would ensure the community liaison officer maintains dialogue with the Parish Council throughout the pre-construction and construction period and ensures the active participation of members in the Community Engagement Group.	United Utilities to appoint a community liaison officer to act as a point of contact for community engagement.
NEIGHBOUR REPRESENTATIONS			
BO LCC 108	Theme – Impact on businesses, particularly working farms and a sensory farm	Following the submission of the planning application we have endeavoured to engage further with those most affected by the proposed scheme, for instance residents and businesses whose daily lives and operations would have been most disrupted by the imposition of the one-way system. In recognition of concerns raised, the one-way system no longer forms part of our proposals. Instead, construction traffic would both access and egress the site via the B6480, Eskew Lane, Long Lane, Spen Brow and Furnessford Road. To facilitate this approach, an 'access only' road closure along Furnessford Road is proposed, with movement of construction traffic limited to one-way. HGV holding areas are now proposed at the junction of Spen Brow and Furnessford Road to allow vehicles travelling south towards the site to be held before being cleared to proceed on the basis that no vehicles, including HGVs leaving the Lower Houses compound and local traffic are travelling north along Furnessford Road. Marshalls would operate	No further action required

		along Furnessford Road confirming the road is 'cleared to proceed' before HGVs are released from either the Spen Brow holding area or Lower Houses compound. Stop and Go signs would be used at private access points and public rights of way along Furnessford Road to remove the potential for vehicles or pedestrians to enter the road once cleared to proceed for construction traffic. We will continue to engage with members of the local community to ensure the proposals incorporate the necessary mitigation to reduce disruption as far as possible.	
BO LCC 109	Theme – Lack of Consultation	The Statement of Community Involvement outlines chronologically the consultation process United Utilities carried out regarding the HARP proposals, to carry out vital work to maintain the water supply across the North West. It illustrates how United Utilities has clearly demonstrated their commitment to conduct an early and proactive programme of community engagement. United Utilities will continue to engage with stakeholders and the public to inform them about the progress of the development and to seek further feedback from the community. In fact, as a result of ongoing dialogue with local residents and in response to comments received through the planning application consultation period, we have amended our construction traffic access proposals, as set out in the LCC Bowland February 2022 CTMP. The proposed one-way system has been removed from the scheme following feedback regarding the level of disruption it would lead to for local residents and businesses.	United Utilities to appoint a community liaison officer to act as a point of contact for community engagement.
BO LCC 110	Theme – Impact of HGV movements on highway safety and amenity in Wennington	Regarding HGV movements through the pinch point in the centre of Wennington, construction traffic associated with the proposed scheme would be limited to 20 mph when travelling through the village and an advisory 30mph speed limit for other road users would be advertised along the haulage route, as confirmed in the LCC Bowland February 2022 CTMP. Signage would also be erected urging other road users to take extra care when driving along the route. The speed of construction vehicles would be monitored in	No further action required

		<p>accordance with the measures outlined in the LCC Bowland February 2022 CTMP.</p> <p>The LCC Bowland February 2022 CTMP provides detail relating to traffic management proposals at 'the narrows' in Wennington. The proposals comprise a priority passing system, controlled through the implementation of 2 no. give ways, which would ensure the safe movement of vehicles through 'the narrows'.</p> <p>A road safety audit will be carried out in advance of the determination of the planning application and United Utilities commits to implementing any recommendations of the audit in accordance with a suitably worded planning condition or as part of the highway agreement.</p> <p>The LCC Bowland February 2022 CTMP also incorporates further consideration of non-motorised users (see Figure C-2-01, Figure C-2-13 and Figure C-2-32). Where existing PRowS meet the proposed access routes, visibility is typically unobstructed and there are existing areas that provide pedestrian refuge. To ensure conditions (visibility and space) are maintained at all such junctions United Utilities would ensure an appropriate vegetation management regime is implemented as part of the proposed highways agreement.</p> <p>HGV movements would be limited to between 08:15 to 18:45 Monday to Friday and on Saturdays between 08:00 to 13:00. Within these hours, the following timing restrictions are proposed to avoid conflict with school drop off and pick up times:</p> <ul style="list-style-type: none"> • no movement of heavy goods vehicles on Route 2 between the hours of 08:45 to 09:30 and 14:30 to 15:15 Monday to Friday • no movement of heavy goods vehicles on Route 1 between the hours of 08:15 to 09:00 and 15:00 to 15:45 Monday to Friday 	
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		<p>There would be no HGV movements on Sundays or Public Holidays.</p> <p>The proposed hours would allow an even distribution of deliveries throughout the day to avoid excessive hourly demand. The contractor would be responsible for managing the daily demand for deliveries and exports for their own fleet and that of their supply chain partners to ensure they comply with agreed daily traffic profiles.</p> <p>It is anticipated that a suitably worded planning condition would be used to place a cap on the number of HGVs travelling through Wennington on an hourly and daily basis and United Utilities are supportive of the use of such a condition.</p>	
BO LCC 111	Theme – Impact of HGV movements on highway safety and amenity in Wray	<p>It is acknowledged that Main Street in Wray is relatively narrow and parked cars act as a further constriction. As set out in the LCC Bowland February 2022 CTMP, whenever HGV movements along route 1 are required, temporary traffic management measures would be implemented to prevent parking along the road and thus removing possible barriers to HGV movements. We would ensure advanced notice of such measures is communicated to the Parish Council and members of the local community via our community liaison officer. The swept path analysis for route 1 (via Main Street) takes into account the need for abnormal indivisible loads (AIL) to use that route and we are confident that, with the traffic management measures proposed, any idling of vehicles through the village would be kept to a minimum.</p> <p>During site surveys, we observed approximately 20-25 vehicles parked on the sections of Main Street to be affected by temporary restrictions. On a conservative basis we have assumed 33 vehicles may be displaced. It should be noted that the majority of these vehicles would only be displaced as a consequence of the much less frequent AIL movements. Provision of 20 additional temporary parking spaces is proposed at the car park at Bridge</p>	No further action required

		<p>House Farm Café (not including the existing approximate capacity of 25 vehicles subject to availability). In addition, a minimum of 13 off-street parking spaces have been identified in the village that could accommodate the vehicles not directly accommodated in the 20 new spaces proposed.</p> <p>The replacement parking provision would not impact the existing parking provision at the tea rooms and Figure C-2-32 in the LCC Bowland February 2022 CTMP setting out the route for pedestrians between the tea rooms and Main Street. Signage would be erected to indicate the route for pedestrians and to urge other road users to take extra care when driving along route 1.</p> <p>Our community liaison officer would work with those whose parking is displaced to support them in using the alternative provision and would provide assistance in any situation where parking elsewhere would cause difficulty for an individual, for instance if they have limited mobility.</p> <p>A number of alternative haulage route options were considered as part of the options appraisal process, including the routing of vehicles along Moor Lane and School Lane. This option was discounted on the basis that larger vehicles would not be able to safely negotiate the School Lane / Main Street corner in either direction.</p> <p>We recognise that the local area is a popular destination for tourists, particularly during at certain times of year when events, such as Wray Scarecrow Festival and Fair, are held. Our community liaison officer would maintain dialogue with the Parish Council and members of the local community throughout the pre-construction and construction period and would seek to ensure that extra effort is made to limit the intensity of construction activities at these times.</p>	
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BO LCC 112	Theme – Traffic Management Proposals (proposed one-way system along route 2)	See response to BO LCC 33.	No further action required
BO LCC 113	Theme – Hours of Working and Disruption	<p>HGV movements would be limited to between 08:15 to 18:45 Monday to Friday and on Saturdays between 08:00 to 13:00. Within these hours, the following timing restrictions are proposed to avoid conflict with school drop off and pick up times:</p> <ul style="list-style-type: none"> no movement of heavy goods vehicles on Route 2 between the hours of 08:45 to 09:30 and 14:30 to 15:15 Monday to Friday no movement of heavy goods vehicles on Route 1 between the hours of 08:15 to 09:00 and 15:00 to 15:45 Monday to Friday <p>There would be no HGV movements on Sundays or Public Holidays.</p> <p>The proposed hours would allow an even distribution of deliveries throughout the day to avoid excessive hourly demand. The contractor would be responsible for managing the daily demand for deliveries and exports for their own fleet and that of their supply chain partners to ensure they comply with agreed daily traffic profiles.</p> <p>Single 10-hour construction shifts are anticipated for the majority of the time, however, it is anticipated that there will be 24 hour working (two 12-hour shifts) during two periods:</p> <ul style="list-style-type: none"> TBM recovery - circa 4 weeks during construction - phase 2 (ground around the tunnel can become unstable during this process so 24-hour working is required to ensure the activity can be completed safely) Connection to the existing aqueduct - circa 9 weeks during construction - phase 2 (24 hour working needed to minimise impact to the water distribution network since 	No further action required

		<p>United Utilities will need to temporarily isolate parts of the existing Haweswater Aqueduct).</p> <p>The potential noise and vibration impacts arising from the construction of the proposed tunnel have been assessed. The outcome of the assessment is reported in Volume 2 Chapter 17 of the ES. There are no likely significant noise or vibration disturbance effects predicted on residential or community receptors as a result of tunnelling activities.</p>	
BO LCC 114	Theme – Ecological Impact	See responses to BO LCC 59, BO LCC 61 and BO LCC 63.	No further action required
BO LCC 115	Theme – Environmental impact arising from operation of Route 2	<p>A thorough assessment of the likely significant environmental effects arising from the use of the proposed construction traffic routes and associated highway modification works has been carried out and is reported in Volumes 2 and 5 of the Proposed Bowland Section Environmental Statement (ES).</p> <p>The noise and air quality assessments set out in Chapters 17 and 18 in Volume 2 of the ES take into account effects on ecological receptors as well as human receptors. Chapter 9 (Ecology) uses the outputs from the quantitative noise and air quality assessments to inform further consideration of the potential for likely significant effects on ecological receptors. No significant adverse effects are predicted.</p>	No further action required
BO LCC 116	Theme – Potential for damage to properties, structures and highways	<p>Appropriate surveys of all highway structures potentially impacted by the proposed scheme would be carried out to inform the Contractor's detailed design and the submission of any findings, in addition to details of any necessary remedial works, would be covered in the proposed highways agreement.</p> <p>Other buildings with the potential to be impacted by the proposed works would be subject to a condition survey before, during and after the works. Copies of the condition reports would be made</p>	No further action required

		available to property owners and any issues identified and deemed to have been caused by the proposed development would be rectified.	
BO LCC 117	Theme – Safety of Pedestrians	See response to BO LCC 12.	No further action required
BO LCC 118	Theme – Loss of Biodiversity	A biodiversity net gain offsetting strategy has been produced, the implementation of which would ensure biodiversity net gain over a minimum period of 30 years is delivered as a result of the proposed development.	No further action required
BO LCC 119	Theme – Carbon Impact	<p>There would be no requirement for energy-consuming pumping plant or machinery under normal day-to-day operating conditions, and consequently there would be no significant carbon emissions associated with treated water supply. It is acknowledged, however, that HARP would give rise to direct and indirect carbon emissions associated with the enabling works, construction activities, materials usage, and commissioning of the infrastructure before it enters use. The main sources of carbon emissions would include transport and road haulage of surplus materials, the use of diesel generating sets at the construction compounds, and concrete and steel usage in the shafts and tunnel segments.</p> <p>An estimate of construction related carbon emissions is provided in Volume 2, Chapter 18 of the Proposed Bowland Section ES.</p> <p>United Utilities is proposing to embed carbon and climate agenda-related requirements in the procurement process for consortia seeking to finance, design, build and maintain HARP. 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.</p>	No further action required
BO LCC 120	Theme – Community Involvement during Construction	A community liaison officer would be appointed to act as a point of contact for community engagement prior to the	United Utilities to appoint a

		commencement of the enabling works and during the construction phase. We would ensure the community liaison officer maintains dialogue with all Parish Councils and other interested stakeholders, such as local walking, cycling or horse-riding groups, throughout the pre-construction and construction period and ensures the active participation of all parties through the Community Engagement Group.	community liaison officer to act as a point of contact for community engagement.
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Appendix A2: Summary of Consultation Responses to the Ribble Valley Borough Council Application (3/2021/0660)

Document reference: RVBC-BO_SEI-A2



Haweswater Aqueduct Resilience Programme - Proposed Bowland Section

Supplementary Environmental Information

Appendix A2: Summary of Consultation Responses to the Ribble Valley Borough Council Application (3/2021/0660)

February 2022



Haweswater Aqueduct Resilience Programme - Proposed Bowland Section

Project No: B27070CT
Document Title: Proposed Bowland Section, Supplementary Environmental Information
Appendix A2: Summary of Consultation Responses to the Ribble Valley Borough Council
Application (3/2021/0660)
Document Ref.: RVBC-BO_SEI-A2
Revision: 0
Date: February 2022
Client Name: United Utilities Water Ltd

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1. Summary of Consultation Responses to the Ribble Valley Borough Council Application (3/2021/0660)

1.1 Introduction

- 1) This document provides a consultation response from United Utilities (UU) in respect of the comments received post submission to Ribble Valley Borough Council planning application (ref: 3/2021/0660) from statutory agencies, local authority officers, non-statutory organisations as well as public comments where a response has been provided to the key themes.
- 2) It should be noted that this document has considered responses received during the period between the submission of the planning application in June 2021 and December 2021. Any responses received by the Ribble Valley Borough Council after the 9th December 2021 have not been considered within this document.

Resp No.	Consultation Response Text	United Utilities Response	Action
LANCASHIRE COUNTY COUNCIL HISTORIC ENVIRONMENT TEAM			
BO RVBC 01	<p>The Historic Environment Team is of the opinion that the proposed mitigation as outlined in section 10.8.1 of the Environmental Statement, Vol.2 is an appropriate means of mitigating any adverse impact of the proposed development on any archaeological features, known or currently unknown, that might lie within those parts of the proposed development.</p> <p>Consequently, the Historic Environment Team would advise that the mitigation measure outlined in section 10.8.1 of the Environmental Statement, Vol. 2, a staged programme of post-permission, but pre-construction, work is secured by means of condition.</p>	United Utilities support the principle of the proposed condition requesting that a staged programme of pre-construction mitigation is submitted and approved by the Local Planning Authority but would seek for this to be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.	Ribble Valley Borough Council to consider use of the recommended condition.
NATURAL ENGLAND			
BO RVBC 02	<p>Designated Landscape (Forest of Bowland AONB)</p> <p>Further information is needed about how the scheme has been planned, particularly in relation to the siting of individual components of the 'pre-operational' construction phase, is fully commensurate with the area's designated status and its high sensitivity to this sort of major development.</p> <p>Note that no mitigation is proposed for any of the compounds as they are considered to be 'temporary'. We understand that the compounds will be removed and land reinstated once works are complete. In that sense they are 'temporary'. However, the works would be undertaken for a >10 year period which is a long-term presence within the AONB. Mitigation measures should therefore be considered, encompassing both the careful selection of sites</p>	<p>Designated Landscape (Forest of Bowland AONB)</p> <p>Appendix A of the Planning, Design and Access Statement submitted in support of the planning application sets out the policy requirements of the Major Development Test in respect of works proposed in an AONB and provides an assessment of the Proposed Bowland Section against these requirements.</p> <p>Regarding the Newton-in-Bowland compound, the location is constrained by the need to connect onto the existing aqueduct. United Utilities has sought to make the connection as near as possible to the existing aqueduct to minimise the need for disturbance and environmental impact associated with lengthy sections of open cut pipework. The compound would be a prominent feature in landscape and visual terms, so the design focussed on avoidance of features through careful positioning and a thorough landscape and visual assessment was undertaken to</p>	Ribble Valley Borough Council to consider use of the recommended conditions.

	<p>and further screening and operational measures. The latter can include lighting and noise reduction strategies.</p> <p>The submitted LVIA (ES Volume 2 Chapter 6) states that enabling, construction and commissioning works for the Newton-in-Bowland compound “will become the dominant feature in the view and would result in a substantial change to the character of the view. These high sensitivity visual receptors would therefore experience a major magnitude of effect, resulting in a major adverse significance of effect”. We agree with this assessment. However, what is lacking is a clear explanation of why the compounds have to be located as proposed. If there is an overriding reason, presented against NPPF para 177b, for them being within the AONB then a careful search for sites which can best accommodate them should follow. That means searching for sites with the least sensitivity possible, including any existing screening and other mitigation that topography and/or vegetation can provide, together with any potential to enhance that mitigation. The ES chapters are not clear on what , if any, criteria relevant to national planning policy and the statutory purpose of the AONB were used to identify where the compounds and other key components of scheme should be located. Were other sites considered and assessed?</p> <p>The importance of pre-operational mitigation</p> <p>Given the significant effects that the pre-operational phases will have on this nationally designated landscape, we expect mitigation measures to be identified and applied to lessen the effects as far as is practicable. Para 177c of the NPPF does not limit moderation (aka mitigation) measures to only the completed scheme.</p> <p>We note that no mitigation is proposed for any of the compounds as they are considered to be ‘temporary’.</p>	<p>ensure the impacts are well understood and effectively mitigated. All areas would be reinstated to their original use and features reinstated as existing.</p> <p>Further explanation is provided in Section 4 of the Main Supplementary Environmental Information (SEI) Report.</p> <p>The importance of pre-operational mitigation</p> <p>Chapter 20 in Volume 2 of the Proposed Bowland Section ES presents a summary of the mitigation proposed in respect of proposed construction activities. The Chapter also references the Construction Code of Practice (CCoP) (Appendix 3.2 in Volume 4); Schedule of Mitigation (Appendix 20.1 in Volume 4); and Environmental Masterplan (EMP) (Figure 20.1 in Volume 3), which provide further detail on the mitigation proposed.</p> <p>United Utilities note that a number of conditions have been recommended by the AONB’s Landscape Advisor in respect of the Proposed Bowland Section, one of which includes the preparation and submission of further information regarding planting proposals. United Utilities support the principle of the proposed conditions but would request that these be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.</p> <p>Off-site Highway Works</p> <p>The proposed off-site highway works are shown on the planning application drawings and are assessed in Volume 5 of the Environmental Statements. In addition, the cumulative effects arising from the proposed works in their entirety are assessed in Chapter 19 of the Environmental Statements. Section 19.5.4</p>	
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	<p>We understand that the compounds will be removed and land reinstated once works are complete. In that sense they are 'temporary'. However, the works would be undertaken for a >10 year period which is a long-term presence within the AONB. Mitigation measures should therefore be considered, encompassing both the careful selection of sites and further screening and operational measures. The latter can include lighting and noise reduction strategies.</p> <p>Off-site Highway Works</p> <p>Off-site highway works have not been considered within this application. We advise that it is not appropriate to defer the consideration of these works until after a decision has been issued as the implementation of the development depends on these works being undertaken, therefore they need to be considered as a whole.</p> <p>The impact from each change to the highway needs to be considered individually as well as the cumulative impact on the character of the AONB. The in-combination impact as a result of these highway works and the whole development also needs to be assessed to consider the impact of the whole project on the AONB.</p> <p>Ribble Crossing</p> <p>This proposed temporary road is within the setting of the AONB. We understand this is a temporary road and will be removed once works are completed. For the avoidance of doubt we recommend that this is included as a condition to any planning approval given.</p> <p>Soils, Land Quality and Reclamation</p> <p>Natural England advise that any grant of planning permission should be made subject to conditions to safeguard soil resources</p>	<p>specifically considers the interaction between the main tunnel / compound works and the off-site highway works.</p> <p>The requirement for highway modifications has been driven by the need to ensure highway safety along the proposed haulage routes is maintained. In order to minimise the impact of the temporary works on features of landscape and ecology interest, the widened sections would be located to provide proportionate inter-visibility, ensuring that where there is a possibility of vehicles meeting on narrower sections there is minimal risk of vehicles having to reverse (i.e., there is space for over run as per existing operation). Wherever possible, United Utilities has sought to limit tree and hedgerow removal though the careful selection of road widening locations.</p> <p>A proactive highway maintenance regime would be put in place to intervene before any road formation issues escalate as a consequence of overrun. This approach achieves a balance between addressing existing pinch point and visibility limitations and avoiding so far as reasonably practicable impact on landscape and ecology within the AONB.</p> <p>Ribble Crossing</p> <p>United Utilities support the use of a condition in respect of the removal and reinstatement of the Ribble Crossing.</p> <p>Soils, Land Quality and Reclamation</p> <p>United Utilities support the principle of the proposed conditions but would request that these be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction</p>	
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	Habitats Regulations Assessment No Objection Sites of Special Scientific Interest (SSSI) Assessment No Objection		
RIBBLE VALLEY BOROUGH COUNCIL – ENVIRONMENTAL HEALTH			
BO RVBC 03	<p>The air quality assessment concludes [in part]: Appropriate good practice dust mitigation measures would prevent significant effects occurring at off-site locations. Such measures are considered to be normal good practice that would be adopted by the contractor meeting the requirements of the air quality mitigation measures within the CCoP. These would also be agreed with the local authority prior to construction works commencing</p> <p>The noise and vibration assessment concludes [in part]: the CCoP includes construction mitigation measures for the management of construction airborne noise and vibration, and specific measures for the school and Lilands barn have also been identified.</p> <p>The periods over the extent of the project when 24/7 working will be required will require careful site illumination to avoid light pollution affecting both nearby residents and the local wildlife in a deeply rural location. This has been recognised in the construction plans submitted.</p> <p>Conclusions/Suggested Conditions</p> <p>The above observations have been provided on the basis of the level of information submitted and the comments contained within this response represent officer opinion only, at the time of writing, without prejudice.</p>	<p>United Utilities support the principle of the proposed condition but would request that it be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.</p>	<p>Ribble Valley Borough Council to consider use of the recommended condition.</p>

	Industry-standard mitigation methods and best practicable means of minimising nuisance are described in the submitted documents and are intended to be utilised: the use of these should be a condition of any approval.		
GREATER MANCHESTER ECOLOGY UNIT			
BO RVBC 04	No comments have been received to date.	N/A	No further action required.
RIBBLE VALLEY BOROUGH COUNCIL ARBORICULTURAL OFFICER			
BO RVBC 05	No comments have been received to date.	N/A	No further action required.
LANCASTER CITY COUNCIL			
BO RVBC 06	Having carefully considered the basis of these applications LCC has NO OBJECTIONS provided that RVBC only considers granting permission (subject as necessary to appropriate conditions and obligations) if it has correspondingly ensured that appropriate measures will be put in place (whether that be the proposed Waddington Fell Quarry or another equivalent acceptable solution) so as to ensure the appropriate handling and management of all of the tunnel arisings/other waste materials that may be derived from the Bowland Section of the replacement aqueduct.	United Utilities note that the Waddington Fell Quarry application is linked to the Proposed Bowland Section, in that, if planning permission is granted by the Minerals Planning Authority (Lancashire County Council) such permission may only be implemented in order to accept surplus material arising from the Proposed Bowland Section. Similarly, planning application 3/2021/0660 is based on surplus tunnel arisings being sent to Waddington Fell Quarry. Should this not be possible, an alternative solution would need to be sought and a revised planning application submitted.	Ribble Valley Borough Council to consider use of the recommended condition and/or obligation as appropriate.
LANCASHIRE COUNTY COUNCIL (HIGHWAY AUTHORITY)			
BO RVBC 07	Consideration of additional measures (speed restrictions, road user compliance etc.) is required to provide a satisfactory proposal.	A 30-mph speed limit would be implemented in the vicinity of the Newton-in-Bowland compound access off Hallgate Hill with signage and gateway measures installed to aid awareness. An advisory 30mph speed limit would be put in place elsewhere along the haulage route. Signage would also be erected at key points along the haulage route urging other road users to take	Ongoing dialogue with the Highway Authority to be maintained following their review of the

		<p>extra care when driving along the route. The speed of construction vehicles would be monitored in accordance with the measures outlined in the RVBC Bowland February 2022 CTMP.</p> <p>The intention is that existing two-way roads would operate as they do now. The proposed road modifications are considered a proportionate enhancement to existing operation. The engineering design approach, as set out in the RVBC Bowland February 2022 CTMP, sets out the rationale adopted to identify the location of road widening proposals to facilitate more frequent informal contraflows at existing constrictions.</p> <p>Where constrictions are present it is evident that when HGVs currently meet at such points, having travelled beyond a point where an informal contraflow can be established, they pass by overrunning the road edge rather than reversing. The current proposals would not completely eliminate the possibility of this happening, but they would reduce the risk associated with it, through:</p> <ul style="list-style-type: none"> • The implementation of an extensive programme of driver training and public engagement; and • A proposed highway agreement, currently under consideration by LCC highways, includes the implementation of a proactive scheme of verge monitoring and maintenance in order to intervene before any road formation issues escalate as a consequence of any overrun. <p>During the design process, consideration was given to using formal 'passing places' and imposing an operational logic whereby construction traffic is compelled to stop at such places, however, this approach was not taken forward for the following reasons:</p>	<p>supplementary information submitted. Lancaster City Council to consider the use of necessary conditions, such as the implementation of the measures set out in the CTMP.</p> <p>In addition, a draft Road Condition Monitoring and Maintenance Strategy has been provided to the Highway Authority for comment. United Utilities will continue to liaise with the Highway Authority with a view to the strategy being agreed as part of a wider highways legal agreement in the event that planning permission is granted.</p>
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		<ul style="list-style-type: none"> • It may lead to increased frustration of non-construction related road users, leading to a higher likelihood of impatience, and potentially causing dangerous overtaking. • It may lead to increased vehicle wait times in passing places disrupting local residents and businesses • It may lead to greater noise and vehicle emissions associated with stopping and starting. • It would result in an increase in the scale of the works, leading to greater community disturbance and causing adverse impacts in terms of habitat loss and loss of visual amenity within the Forest of Bowland Area of Outstanding Natural Beauty. • It would reduce the likelihood of the operational logic being self-policing due to: <ul style="list-style-type: none"> ○ Risk of non-construction traffic, for example visitors to the local area, using the passing places for parking. ○ A significant change in how single carriageways operate, which may not be intuitive to drivers, leading to difficulties implementing and enforcing the regime. 	
BO RVBC 08	Vehicle tracking is provided for the low loader vehicle with either a step trailer or 40' artic vehicle in the opposite direction. We would request clarification on the use of varying vehicles (plus clarify wing mirrors, meeting HGV's > 2.5m)	Swept path analyses have been provided in line with the controls set out in the RVBC Bowland February 2022 CTMP and these include vehicle wing mirrors. The swept path analyses represent the likely worst case in terms of vehicle passing. HGVs wider than 2.5m would be controlled to only travel in one direction at any one time. The proposed HGV Holding Area would be utilised where necessary to enable this control. The swept path analyses have been used to determine the highway modification proposals.	
BO RVBC 09	I would note that the necessary parking restriction proposed on West Bradford Road (shown in Figure B-2-15 of the CTMP) is missing from Highway Works Masterplan drawing and from the Offsite Highway Works drawings.	The omission of the parking restriction from the Highway Works Masterplan and off-site Highway Works drawings is acknowledged. The RVBC Bowland February 2022 CTMP provides details of traffic management proposals on West Bradford Road at the north of Waddington. The proposals seek to formalise an existing informal	

		contraflow through the provision of 2 no. give ways and parking restrictions on West Bradford Road as it approaches the centre of Waddington from the east. There would be no parking restrictions in front of No.s 62 to 66 West Bradford Road. It is noted that there is on-site parking provision at Waddington Almshouses. Further detail relating to these proposals is provided in the RVBC Bowland February 2022 CTMP.	
BO RVBC 10	Within the CTMP, there are examples of physical works (i.e., "two-way control at the pinch points around the 3 Millstones in West Bradford"). To understand the location and the need for these proposals, they should be marked on the swept path analysis drawings.	As set out above, the RVBC Bowland February 2022 CTMP provides details of traffic management proposals on West Bradford Road at the north of Waddington. Haulage Route Option 2 (the Ribble Crossing) has been adopted as the proposed route for construction traffic access to the Newton-in-Bowland compound and as a result, highway modifications and traffic management proposals solely relating to Haulage Route Option 1 have been removed from the proposed development.	
BO RVBC 11	The location of the passing places must account for driver visibility of oncoming vehicles and drivers' judgements of the need to use the road widenings, in the placement of places. This information is currently not provided but required.	See response to BO RVBC 07.	
BO RVBC 12	A59 traffic may lead to increased delays for users but it may also impact on safety. The applicant must identify the impacts on safety at this location and provide a safe and suitable solution, if required.	A road safety audit will be carried out and United Utilities commits to implementing the findings of the audit in accordance with the requirements of a suitably worded planning condition. United Utilities would request that the condition be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.	
BO RVBC 13	Lack of modifications for the access route via Waddington centre	The RVBC Bowland February 2022 CTMP provides details of traffic management proposals on West Bradford Road at the north of Waddington. Haulage Route Option 2 (the Ribble Crossing) has been adopted as the proposed route for construction traffic access to the Newton-in-Bowland compound and as a result the route through Waddington from Clitheroe would only be utilised during	

		the enabling works phase to facilitate construction of the Ribble and Hodder Crossings. The RVBC Bowland February 2022 CTMP has been updated to account for this.	
BO RVBC 14	I would note that cars are frequently parked on A671, and while the tracking suggests that the road will be able to accommodate vehicles in both directions, it does not give consideration for parked vehicles.	See response to BO RVBC 13.	
BO RVBC 15	While the narrow sections of the route (Brungerley Bridge and priority passing places) are highlighted, there do not appear to be proposals to overcome the impacts of the construction traffic at these locations.	See response to BO RVBC 13.	
BO RVBC 16	Along the B6478, through Waddington, there are sections of road with no pedestrian footway provision and cars are frequently parked at these locations. Construction vehicles will not be able to use the highway simultaneously at these locations and these issues do not appear to be shown or highlighted in the proposals, nor any solution proposed.	See response to BO RVBC 13.	
BO RVBC 17	Comments relating to road widening proposals RW01 to RW07	Haulage Route Option 2 (the Ribble Crossing) has been adopted as the proposed route for construction traffic access to the Newton-in-Bowland compound and as a result road widening locations RW01 to RW07 are no longer proposed in the planning application. Haulage Route Option 1 would only be used for a short-term period of approximately 9 months during the enabling works to facilitate construction of the Ribble and Hodder Crossings. The route through Chatburn, Grindleton and West Bradford would only be utilised by exception and no more than 4 HGVs per day would be permitted to use the route. Further information regarding the traffic management controls to be implemented during this period are set out in the RVBC Bowland February 2022 CTMP.	

BO RVBC 18	Along Grindleton Rd and West Bradford Rd there are several locations where two vehicles cannot be accommodated, yet there are no proposals to overcome this.	See response to BO RVBC 17. As set out above, the RVBC Bowland February 2022 CTMP provides details of traffic management proposals on West Bradford Road at the north of Waddington.	
BO RVBC 19	While swept path analysis from the haul road junction on the east-west West Bradford Road to the compound is provided, we require swept path analysis from the A59 to the haul road junction off the north-south West Bradford Road.	Through further dialogue with Highways Officers at Lancashire County Council, it has been confirmed that swept path analysis from the A59 to the haul road junction off West Bradford Road is not required on the basis that the existing road is of sufficient grade and width to accommodate two-way HGV movements.	
BO RVBC 20	There is an existing bus stop north of the proposed Ribble Crossing haul route junction off West Bradford Road (southern extent). The impacts on this bus stop do not appear to have been assessed, nor its impact on the junction and visibility.	As set out in the RVBC Bowland February 2022 CTMP, the existing shelter would be retained, and the marked stop and clearway would be relocated approximately 10m to the north away from proposed Ribble Crossing junction. It is considered that the detailed design and implementation of the relocated bus stop could be the requirement of a suitably worded planning condition, aligned to an agreed phasing plan.	
BO RVBC 21	On West Bradford Rd (at approx. 7690m chainage) the tracking shows that two low loaders cannot pass.	It is worth noting that the swept path figures appended to the CTMP have limited resolution and there are also discrepancies between actual conditions and those suggested by current OS mapping. The result of these factors is that on the whole the existing figures present a pessimistic view of potential vehicle passing constrictions. Where constrictions are present it is evident that when HGVs currently meet at such points having travelled beyond a point where an informal contraflow can be established, they pass by overrunning the road edge rather than reversing. The current proposals would not completely eliminate the possibility of verge overrun, but would help to reduce the risk, through:	

		<ul style="list-style-type: none"> • Extensive driver training and public education. • The implementation of a proactive maintenance regime to intervene before any road formation issues escalate as a consequence of any overrun. 	
BO RVBC 22	Without replacement parking provision, vehicles will be displaced to other locations that is likely to impact the safety of all road users and the unrestricted movements of the construction vehicles.	<p>It is not anticipated that the traffic management proposals on West Bradford Road to the north of Waddington would lead to displaced parking. The proposals seek to formalise an existing informal contraflow through the provision of 2 no. give ways and parking restrictions on West Bradford Road as it approaches the centre of Waddington from the east. There would be no parking restrictions in front of No.s 62 to 66 West Bradford Road. It is noted that there is on-site parking provision at Waddington Almshouses. Further detail relating to these proposals is provided in the RVBC Bowland February 2022 CTMP.</p> <p>Haulage Route Option 2 would only be used for a short-term period of approximately 9 months during the enabling works to facilitate construction of the Ribble and Hodder Crossings. The route through Chatburn, Grindleton and West Bradford would only be used by exception and would be limited to no more than 4 HGVs per day. For this reason, it is not considered necessary to implement parking restrictions within Chatburn.</p>	
BO RVBC 23	There is a lack of footway along sections of West Bradford Rd, and there are no proposals to ensure the safe movements of pedestrians along this section.	Traffic Management proposals on West Bradford Road comprise a priority passing system, controlled through the implementation of 2 no. give ways, which would ensure the safe movement of vehicles through what is a narrow section of West Bradford Road. The proposals also provide sufficient refuge areas for pedestrians. Further details are provided in the RVBC Bowland February 2022 CTMP. Finally, no movement of HGVs would be permitted before 09:00 and between 14:45 and 16:00 to avoid busy times such as the school drop off and pick up.	

BO RVBC 24	The detail of the traffic signal layout and operation needs to be clearly understood in order that it can be demonstrated that this proposal can operate safely (driver compliance at all times of the day/week). We would require clarification on whether it is the applicants' intention that the traffic signals are a permanent fixture for the full duration of the HARP project.	Traffic signals are no longer proposed. The RVBC Bowland February 2022 CTMP has been updated to this effect.	
BO RVBC 25	Various comments on Road Widening / passing place logic. Insufficient width for vehicles to pass in-between road widening.	See response to BO RVBC 07.	
BO RVBC 26	Condition survey will be required for cattle grids (and any others on scheme) and proposal needed for pinch point.	United Utilities acknowledge that appropriate surveys of all structures potentially impacted by the proposed scheme would need to be carried out, however, it is considered that such works would form part of the Contractor's detailed design and therefore the submission of any findings, in addition to details of any necessary remedial works, is covered in the proposed highways agreement.	
BO RVBC 27	We would require confirmation that the access to the HGV holding area will be able to accommodate the expected HGVs. The HARP proposals present a significant intensification over the existing use.	United Utilities has identified a sufficient space to accommodate the number of HGV's expected and negotiations with the landowner are ongoing to ensure the layout can be accommodated within existing operational requirements. It is considered that the detailed layout of the HGV Holding Area could be required as part of a suitably worded planning condition, aligned to an agreed phasing plan.	
BO RVBC 28	Swept path analysis to/from the proposed Clitheroe Park and Ride	Through further dialogue with Highways Officers at Lancashire County Council, it has been confirmed that swept path analysis at the junction into the proposed Clitheroe Park and Ride facility off West Bradford Road is not required on the basis that the use of the site would remain unchanged in that it would continue to be used for the parking of light vehicles and no modifications to the access are proposed.	

BO RVBC 29	Existing capacity of parking area	The Clitheroe Park and Ride comprises approximately 225 spaces for the parking of light vehicles. It is expected that there would be a maximum of 250 site personnel associated with the construction of both the Proposed Bowland and Marl Hill Sections. On the basis that some personnel would car share to the Clitheroe Park and Ride, in accordance with the requirements of a Staff Travel Plan to be implemented by the Contractor, the level of provision is considered to be sufficient.	
BO RVBC 30	Vehicle numbers to/from park and ride	Predicted vehicle numbers to and from the Clitheroe Park and Ride have been extracted from the traffic model and have been provided to the Lancashire County Council Highway Officers for comment.	
BO RVBC 31	<p>While the CTMP states that "appointed construction contractors will adopt a robust monitoring system to ensure all proposed speed limits are adhered to. This will be undertaken by recording physical measurements of vehicles on the highway at random intervals", there are no proposals that ensure the compliance of the speed limits by all vehicles (construction and non-construction). This will require the implementation of a traffic regulation order (TRO) or a temporary traffic regulation order (TTRO). I would note that these proposals are dependent on the success of the TRO application. This is a significant risk to the project as this fall beyond the planning process. The applicant needs to demonstrate that they can suitably manage this risk, with any proposals clearly set out within the CTMP.</p> <p>Enforcement of the proposed speed limits may be problematic due to the number of resources required to provide a regular presence in the remote location. While the applicant and their contractor could put in place extensive measures to control the construction site traffic, they need to demonstrate how the proposed speed limits will be self-enforcing. Simply signing a route with a reduced speed limit will not achieve the desired outcome. This is particularly important when considering the</p>	A 30-mph speed limit would be implemented in the vicinity of the compound accesses on Hallgate Hill and Newton/Dunsop Road with signage and gateway measures installed to aid awareness. An advisory 30mph speed limit would be put in place elsewhere along the haulage route, as confirmed in the RVBC Bowland February 2022 CTMP. Signage would also be erected at key points along the haulage route urging other road users to take extra care when driving along the route. The speed of construction vehicles would be monitored in accordance with the measures outlined in the RVBC Bowland February 2022 CTMP and signage urging other road users to take extra care when approaching the compound junctions would be erected.	

	<p>highway in the vicinity of the proposed construction compound accesses. This issue is dealt with further within the 'Construction Accesses' section below.</p> <p>- LCC Highways require further details on how the proposed speed limit can be shown to operate safely in practice, with all vehicle compliance at all times of the day/week, i.e., at times when no construction traffic will be utilising the route.</p>		
BO RVBC 32	<p>Lighting of junctions during periods of darkness (morning and evening only, not all night) should be considered.</p>	<p>The planning application includes a Lighting Management Plan, which stipulates that "The temporary construction accesses, off-site highway modification works and temporary proposed haul routes would only be lit by exception where there is a specific security/safety issue e.g., at access points, next to a bridge or pedestrian route and subject to a risk assessment. Mitigation would also be used along such routes, e.g., reflectors, in the interests of safety and to avoid the need for lighting." United Utilities anticipate the submission to and approval in writing by the Local Planning Authority of a detailed Lighting Management Plan, based on the Contractor's design, to be the requirement of a planning condition. United Utilities would request that the condition be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.</p>	
BO RVBC 33	<p>Requirement for wheel washing, road sweeping and gritting</p>	<p>United Utilities is committed to ensuring the works do not result in unsafe road conditions. United Utilities is comfortable with the use of suitably worded planning conditions to require the implementation of wheel washing, road sweeping and gritting where required. United Utilities would request that the conditions be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.</p>	
BO RVBC 34	<p>Newton-in-Bowland compound junction from the B6478. This section of road will be reduced to 30 mph for the duration of the HARP project. LCC Highways reiterate the need to ensure all</p>	<p>A 30-mph speed limit would be implemented in the vicinity of the Newton-in-Bowland compound access off the B6478 with signage erected and gateway measures installed to aid awareness. An</p>	

	vehicles comply with this reduced speed limit in the vicinity of the compound access	advisory 30mph speed limit would be put in place elsewhere along the haulage route. The speed of construction vehicles would be monitored in accordance with the measures outlined in the RVBC Bowland February 2022 CTMP.	
BO RVBC 35	Swept path analysis of other frequent HGV movements need to be provided to ensure that the access accommodates simultaneous movements without the need for vehicles to wait on the highway. LCC Highways need to understand gate/security check proposals at the compound and haul road access locations. It is not expected that these accesses will be used by non-HARP project traffic. Therefore, the applicant must demonstrate how vehicles will be accommodated to allow stacking if necessary and to ensure that large vehicles turning off the roads will have unobstructed access.	The access track to the Newton-in-Bowland compound from Hallgate Hill would allow simultaneous two-way movements. A gatehouse is proposed, however this would be set back from the highway. A road safety audit will be carried out and United Utilities commits to implementing the findings of the audit in accordance with the requirements of a suitably worded planning condition. United Utilities would request that the condition be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.	
BO RVBC 36	Once we have a strategy that is considered could potentially work, then a full scheme road safety and operational audit will be required and satisfied.	A road safety audit will be carried out and United Utilities commits to implementing the findings of the audit in accordance with the requirements of a suitably worded planning condition. United Utilities would request that the condition be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.	
BO RVBC 37	Waddington fell Quarry. LCC Highways will not be able to provide support to the HARP project until the site access and improvement and traffic figure elements for Waddington Fell Quarry are fully agreed with LPA, in consultation with the LHA.	It is understood that the applicant has provided, or is due to provide, further information in response to comments made by the Highway Authority.	
BO RVBC 38	The latest version of the spreadsheet provided to LCC Highways as part of the pre-application discussion is revision "TVM - v6 - 30Jun20". LCC Highways require clarification that this version is the most up to date version that has been used for the planning application.	The submitted Transport Assessment and RVBC Bowland February 2022 CTMP are based upon the latest predicted vehicle movements associated with the proposed works.	

BO RVBC 39	LCC Highways will require the information to be presented in terms of all vehicles (as above), but also in terms of HGV numbers. In addition, we require the information to be presented in terms of hourly averages and maximums for both HGVs and all vehicles.	Noted. Hourly averages and maximums for HGVs are set out in the RVBC Bowland February 2022 CTMP.	
BO RVBC 40	Turning diagrams have been provided for the compound's accesses and the Hallgate Hill haul road access. We require this information, with the project peak figures at the following locations: 1. A59/Pimlico Road junction 2. West Bradford Road (north-south) / Ribble crossing haul road junction 3. West Bradford Road (east-west) / Ribble crossing haul road junction; and 4. West Bradford Road / B6478 Slaidburn Rd junction	Peak vehicle movements for the listed junctions are provided in the RVBC Bowland February 2022 CTMP, as agreed with Lancashire County Council Highways.	
BO RVBC 41	The applicant must clarify whether tipper trucks will be stored on site, with provision shown for the vehicles. The movements as presented, do not appear to consider tipper trucks not being stored on site.	United Utilities is in discussions with the operators of Waddington Fell Quarry with a view to tipper trucks being stored at Waddington Fell Quarry overnight. In addition, provision has been made for tipper trucks to be stored at the compound site overnight and the RVBC Bowland February 2022 CTMP includes plans showing sufficient space within the compound areas for tippers to be parked.	
BO RVBC 42	I would note that the restrictions for school peak times need further review (e.g., Clitheroe Royal Grammar School finishes at 14:40 on Wednesdays).	United Utilities notes the early finish at Clitheroe Royal Grammar School on Wednesdays. The proposed restriction on HGV movements between 14:45 and 16:00 would account for this early finish.	
BO RVBC 43	The distribution of vehicles over the strategic road network is 40% from the north and 80% from the south. While this proportion may not be unreasonable and seems robust, we would require evidence to support these proportions.	Through further dialogue with Highways Officers at Lancashire County Council, it has been agreed that the distribution of vehicles over the strategic road network (the M6) is not relevant to the determination of the planning application and thus further justification for the estimated split is not required.	

BO RVBC 44	Junction Operational Assessments. One location, in particular, does require modelling, i.e., the West Bradford Road / B6478 Slaidburn Road junction (proposed to be signalised).	Traffic signals are no longer proposed. See BO RVBC 22, BO RVBC 23, and the RVBC Bowland February 2022 CTMP for further details of traffic management proposals on West Bradford Road as it approaches the centre of Waddington from the east.	
BO RVBC 45	Accident Analysis... , the collisions should be reviewed to identify any patterns or concerns (causation factors and user types) that are likely to be exacerbated by this proposal,	A review of any patterns or concerns (causation factors and user types) that could be exacerbated by this proposal is ongoing and will be submitted to Lancashire County Council Highways.	
BO RVBC 46	Provision for Equestrian, Pedestrian & Cycling, Public Rights of Way. All issues raised by LCC PRow to be addressed by the applicant.	<p>The CTMP has been updated to incorporate further consideration of non-motorised users. Where existing PRowS meet the proposed access routes to the north of Waddington along the B6478, visibility is typically unobstructed and there are existing areas that provide pedestrian refuge. To ensure conditions (visibility and space) are maintained at all such junctions United Utilities would ensure an appropriate vegetation management regime is implemented as part of the highways agreement. The traffic management proposals on West Bradford Road east of Waddington also incorporate sufficient refuge provision for pedestrians.</p> <p>Safe diversion of Public Rights of Way (PRow) wherever necessary have been proposed in Volume 2, Chapter 13 of the Proposed Bowland Section ES. In the event planning permission is granted, applications for the diversion of PRowS wherever required would be submitted to Lancashire County Council with appropriate mitigation implemented in full prior to the PRow being affected.</p>	
BO RVBC 47	Public Transport Accessibility and Provision. Impacts on existing bus stops and any need for temporary relocation must be identified at this stage, with the details agreed with the LHA (not the bus companies). Any impact of the proposal that would result in delay to services / inability to adhere to timetables must be identified at this stage and necessary mitigation agreed.	See response to BO RVBC 20.	

BO RVBC 48	Travel Plan. The CTMP must demonstrate how safe and suitable access can be achieved and managed, and therefore, would expect this to include the management of the workforce and there travel to/from site (compounds / appropriate parking provision / shuttle buses).	The CTMP includes a commitment to developing a Travel Plan. The Contractor would prepare a Travel Plan, setting out how the Clitheroe Park and Ride Facility would be effectively utilised to minimise the number of light vehicles on the local road network, in addition to further measures to embed sustainable transport principles in the behaviours of all construction personnel. It is considered that the development and submission of a detailed Travel Plan could be the requirement of a suitably worded planning condition. United Utilities would request that the condition be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.	
BO RVBC 49	Internal Site Layout, Parking Standards/Parking Provision and SUDS. The applicant must present, at this stage, layouts that show practical and workable solutions.	Sketches demonstrating the capacity for movement and parking of HGVs within the Newton-in-Bowland compound are presented in the RVBC Bowland February 2022 CTMP. The sketches indicate that there is sufficient capacity to prevent delays or stacking at the accesses off Hallgate Hill.	
BO RVBC 50	Newton-in-Bowland compound. Question the need for the proposed number of spaces given the approach presented in regard to the satellite compound and the use of shuttle buses for the workforce. There does not appear to be parking provision for the shuttle bus / buses. There does not appear to be parking provision for tipper truck and we would request clarity on whether tipper trucks are to be stored onsite overnight	<p>The General Arrangement Drawings submitted as part of the planning application present preliminary layouts developed to allow for a reasonable worst-case assessment of likely environmental effects to be undertaken. Some parking for light vehicles is required at the Newton-in-Bowland compound, however, it is accepted that, taking into account the implementation of the Clitheroe Park and Ride facility, the number of parking spaces proposed at the compounds would not in reality be required. The RVBC Bowland February 2022 CTMP provides further clarity on the predicted number of spaces required at each compound and confirms there would be adequate space for the parking of minibuses used to shuttle staff to site from the Clitheroe Park and Ride.</p> <p>United Utilities is in discussions with the operators of Waddington Fell Quarry with a view to tipper trucks being stored at Waddington Fell Quarry overnight. In addition, provision has been</p>	

		made for tipper trucks to be stored at the compound site overnight and the RVBC Bowland February 2022 CTMP includes plans showing sufficient space within the compound areas for tippers to be parked.	
BO RVBC 51	Road Condition Monitoring and Maintenance Strategy (HoTs). LCC Highways will not be able to provide support for the HARP proposal until this draft legal document has been agreed and signed.	Draft Heads of Terms to address "Extraordinary Construction Access to the Highway", which includes for obligations relating to monitoring and maintenance has been provided (10/06/2021) to the Highway Authority for comment. United Utilities is committed to ensuring that there is sufficient provision for necessary monitoring and maintenance of the highway network throughout the construction of the Proposed Bowland Section and recognise the need for heads of terms to be agreed in advance of determination.	
BO RVBC 52	Funding for a full LCC post for the duration of the project. It is considered necessary that funding is secured to support a full LCC post for the duration of the over HARP project.	The need for funding to ensure the Highway Authority is able to adequately execute its duties to be agreed in the proposed highways agreement is recognised and United Utilities is in dialogue with the Highway Authority regarding this.	
BO RVBC 53	A staggered junction is proposed on Newton Road, providing connection between the haul road and compound. For the proposed staggered junction on Newton Road, the proposed access arrangements are shown in drawing RVBC-BO-APP-004-11_01. The dimensions of the proposed access and the visibility splays are shown in drawing B27070CQ-JAC-XX-DRC-TR3_VS-1002 and B27070CQ-JAC-XX-DR-C-TR3_VS-1003, and should be protected by a suitably worded condition, for the duration of the construction works. The visibility splays are based on 40mph speed limits, which is lower than the current speed limit, yet no proposal to reduce the speed limit at this location are shown in Figure B-2-16 of the CTMP. This requires clarification. Prior to submission of the application, LCC Highways had been presented with proposals for speed limit reductions at this location. This staggered junction will accommodate large numbers of slow moving fully laden wagons, that will be making the crossing	Proposals to limit the speed at the junction were omitted from the June 2021 CTMPs in error. Figure B-2-16 of the February 2022 has been updated and includes a proposal to reduce the speed limit to 30 mph, together with gateway measures and signage to raise awareness of the change in speed limit. For clarity, a staggered junction is proposed between the northern and southern halves of the Newton-in-Bowland compound. Notwithstanding this, the proposed design would be subject to road safety audit and United Utilities commits to implementing the findings of the audit in accordance with the requirements of a suitably worded planning condition. United Utilities would request that the condition be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.	

	<p>between compound and haul road to the south. The existing speed limit on this comparably straight section of road is currently derestricted. Therefore, it is LCC Highways view that a speed reduction down to 30 mph will be necessary, and the detail should be provided that demonstrate safe and suitable access, with self-enforcing speed limits.</p> <p>Notwithstanding the drawings and information provided for the proposed staggered junction on Newton Road, there remains the opportunity for a crossroads access arrangement. During preapplication discussions, LCC Highways were provided with a risk assessment (completed by the applicant), which showed a slightly lower risk score for the staggered junction proposal.</p> <p>The applicant needs to consider the number and frequency of anticipated movements to and from the junctions to identify the suitable solution. While the documents suggest a staggered junction arrangement, the plans would appear to indicate both crossroad and stagger. Clearly this introduced even more conflicts and is a concern. LCC Highways would request further explanation of how the applicant anticipates these site accesses to operate safely in practice.</p>		
BO RVBC 54	<p>The compound has been divided into two sections, north and south of Newton Road. The section of the proposed compound north of Newton Road is where the proposed tunnelling and connection activities would take place, and the section of the proposed compound south of Newton Road would provide a temporary crossing over the River Hodder (referred to as 'The Hodder Bridge'), parking, welfare, office, materials laydown, and other ancillary development. It is unclear from the drawings presented to the date what provision is proposed for non-vehicular movements (of workers) between the proposed parking and welfare area (south of Newton Road) to the tunnel shaft area (north of Newton Road). It would be LCC Highways expectation that such movements will take place and therefore</p>	<p>It is anticipated that pedestrian movements between the proposed parking and welfare area (south of Newton Road) to the tunnel shaft area (north of Newton Road) would be minimal on the basis that the majority of personnel would be bused between the two sites. Notwithstanding this, in accordance with CDM requirements, a segregated pedestrian route would be implemented, and a banksman would control crossings of Newton/Dunsop Road, to avoid conflicts between pedestrian and vehicular movements.</p> <p>Also, see response to BO RVBC 50.</p>	

	adequate, safe, and suitable provision should form part of the access layout proposals. On both construction and connection drawings, there are circa 50 parking spaces shown (these appear to be for LGVs). I would question why there is a need for this number of spaces given the approach presented in regard to the park and ride facility and the use of shuttle buses for the workforce. There does not appear to be parking provision for the shuttle bus / buses. As my comment above, there does not appear to be parking provision for tipper truck and we would request clarity on whether tipper trucks are to be stored onsite overnight.		
LANCASHIRE COUNTY COUNCIL PUBLIC RIGHT OF WAY OFFICER			
BO RVBC 55	Formal comments from the Lancashire County Council Public Right of Way Officer in relation to planning application 3/2021/0660 have not been received.	N/A	N/A
SABIC UK PETROCHEMICALS LIMITED			
BO RVBC 56	The proposed development is within various zones associated with a pipeline operated by SABIC which is classed as a major accident hazard pipeline. Further liaison with and approval of SABIC is required.	United Utilities will continue to engage in dialogue with SABIC UK to ensure the detailed design and construction of the Ribble Crossing incorporates adequate mitigation and control measures to avoid any impact on the integrity or operation of the pipeline.	United Utilities to remain in close dialogue with SABIC UK.
RIBBLE FISHERIES CONSULTATIVE ASSOCIATION			
BO RVBC 57	Oppose the planning application on the basis that the EIA has not been shared and tangible evidence of robust mitigation schemes to manage and contain diffuse pollution have not been provided. EIA must contain a monitoring and alert system. Pollution monitoring system must be installed at least 12 months prior to construction to allow a rigorous set of baseline data to be collected.	United Utilities has been in dialogue with Ribble Fisheries Consultative Association throughout the pre-application and application periods to confirm our intentions in respect of water quality monitoring and mitigation proposals. United Utilities will be carrying out baseline water quality monitoring starting in 2022 to obtain an accurate picture of current water quality in the River Ribble, taking into account seasonal variations. Our baseline monitoring proposals include Smart River Sampling, the installation of Sondes and chemical testing. United Utilities would	United Utilities to remain in close dialogue with Ribble Fisheries Consultative Association

	<p>The project will impact the whole spectrum of riparian life on the Ribble, including Atlantic salmon but also fly life, birdlife and otter. The Ribble is one of only a handful of rivers with a viable migratory salmon run, thanks in part to the efforts of local anglers. With an anticipated duration of 6-8 years, unless diffuse pollution and sediment runoff and effectively monitored, managed and mitigated, this project has the potential to bring the Atlantic salmon to the point of extinction in the Ribble catchment.</p> <p>Request the application is subject to more robust scrutiny, particularly from an environmental perspective.</p> <p>Request consultation on submission of EIA.</p>	<p>use the baseline data to inform the definition of water quality parameters which activities on site would be monitored against.</p> <p>In advance of construction United Utilities would develop a detailed Construction Environmental Management Plan, Surface Water Management Plan and Water Quality Monitoring Protocol. United Utilities anticipate that the submission of these documents for approval by the Local Planning Authority, following consultation with relevant regulatory bodies and key stakeholders, would be the subject of suitably worded conditions. United Utilities would request that the conditions be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.</p>	
FOREST OF BOWLAND AONB (LANDSCAPE)			
BO RVBC 58	Require detailed tree survey/arboricultural assessment of the areas affected by the off-site highway works	Supplementary aboricultural survey data is included as part of the SEI.	Ribble Valley Borough Council to consider use of the recommended conditions.
BO RVBC 59	Inconsistency in number of trees lost or affected. Provide table summarising a) veteran trees. b) ancient trees. c) other tree categories.	A table summarising the arboricultural features to be removed, or at risk of removal is included as part of the SEI.	
BO RVBC 60	How can the LPA be sure that the worst-case scenario has been considered?	The red line areas shown on the Site Location Plan have been drawn on a conservative basis to ensure that all necessary permanent and temporary works can be implemented without the need for additional works outside of the proposed boundaries. The aboricultural impact assessment is considered to be conservative, in terms of predicted loss of features within the redline boundary and full reinstatement following the principles set out in Volume 5 and Chapter 6 (The LVIA).	

BO RVBC 61	The AIA does not address notable trees and other trees of special interest	<p>Supplementary arboricultural survey data is included as part of the SEI.</p> <p>Following design refinements, details of which are included in the SEI, no veteran trees would be removed to accommodate the proposed works.</p>	
BO RVBC 62	Need to demonstrate that all reasonable options for avoidance and retention have been exhausted	See response to BO RVBC 02.	
BO RVBC 63	What information the applicant has provided with the planning application on the off-site highway works lacks detail and as indicated above has not even been informed by critical survey work such as an arboricultural survey which undermines the validity of assumptions the applicant has made. The number of trees that may be affected by the off-site highway works is a concern and with this in mind it would not be appropriate to determine the planning application without tree specific information on losses, crown raising, pruning, etc.	<p>Supplementary arboricultural survey data in relation to the proposed off-site highway modifications is included as part of the SEI.</p> <p>The selection of proposed highway modification works has been dictated to a large degree by highway safety considerations. Notwithstanding this, the micro-siting of the highway modifications took into account the need to reduce impacts on trees as far as possible, within the constraints dictated by highway safety requirements. The assessment in Volume 5 of the Environmental Statement, which has been updated as part of the SEI, represents a reasonable worst case and it is anticipated that the level of impact can be reduced further through detailed design. It is considered that the submission of final reinstatement proposals for each highway modification location could be the requirement of a suitably worded planning condition.</p> <p>A table summarising the arboricultural features to be removed, or at risk of removal is presented as part of the SEI.</p>	
BO RVBC 64	I am unable to fully explain to the AONB Joint Advisory Committee the precise reasons why certain sites have been selected, which ones were ruled out and why and, whether the chosen sites are optimal in landscape and visual terms.	See response to BO RVBC 02.	

BO RVBC 65	Programme - further clarity required	United Utilities note that a condition has been recommended in respect of the submission and approval of a detailed phasing plan in advance of commencement. We would support the use of the recommended condition.	
BO RVBC 66	Multi-line to multi-line connection - were any landscape and visual factors considered during the analysis and assessment of the two options and, which of them would likely be more acceptable in landscape terms taking account of site location, visibility, opportunities for mitigation, etc?	The multi-line to multi-line is the reasonable worst-case option and has been assessed as such for the landscape and visual assessment. As the multi-line to multi-line connection would be undertaken near the tunnel shaft and directly following the tunnelling phase, the area of land required for the connection would be within the main working compound and already subject to disruption including soil stripping and other construction activity. This would be the case for whichever option were selected. The commissioning phase would prolong the construction by a few months which is a short duration in comparison to the tunnelling phase. The land would be returned to its original use after the commissioning phase.	
BO RVBC 67	Decommissioning - unclear whether any sections of the decommissioned aqueduct would be removed or brought into some form of commercial use. Require more information on the future proposals for use/removal/abandonment/mothballing of the decommissioned aqueduct.	There would be no new features and no landscape and/or visual effects.	
BO RVBC 68	<p>To minimise environmental impacts, the following replacement planting numbers which fully reflect the importance and landscape/biodiversity/cultural value of those lost are recommended:</p> <ul style="list-style-type: none"> • Ancient, veteran, notable and other trees of special interest – between 30 and 300 trees for each one lost. • Ancient woodland – 30 hectares of woodland planting for every hectare lost. 	Following design refinements, details of which are included in the SEI, no veteran trees would be removed to accommodate the proposed works. No areas of ancient woodland would be affected by the proposed works.	

BO RVBC 69	Recommendations in relation to embedded mitigation proposals (reinstatement of fences, boundary features and vegetation; use of native species; reinstatement of agricultural land and removal of temporary access/parking areas)	United Utilities supports the recommendations in terms of the final specification of embedded mitigation measures. It is considered that such requirements could be controlled through a suitably worded planning condition. United Utilities would request that such a condition be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.	
BO RVBC 70	Topsoil storage height should be limited to height of 1m with an absolute maximum of 2m should be used for stockpiled topsoil and subsoil.	United Utilities note that a condition has been recommended requiring that the height of topsoil and subsoil storage mounds be limited to 2m. We would support the use of the recommended condition, which would be adhered to throughout the development.	
BO RVBC 71	Assessment of off-site highway works area have not been included in Volume 2 Ch 6	<p>An assessment of off-site highway works was included in Volume 5 of the Environmental Statement.</p> <p>The landscape and visual assessment of off-site highways works has been undertaken fully in accordance with Appendix 6.1. The Landscape and Visual Impact Assessment Methodology. As with the methodology adopted in relation to the main compound, as reported in Volume 2 Ch.6, site visits were undertaken at all locations to consider the impacts. Design advice was provided where, within the constraints of the site locations, avoidance of features would help reduce temporary or permanent effects. It was agreed with Planning Officers at Ribble Valley Council that a summarised approach to reporting would be appropriate at this earlier stage of design and is based on a worst case of loss of features within the redline boundary and full reinstatement following the principles set out in Volume 5 and Volume 2 Chapter 6.</p>	
BO RVBC 72	Disagree with the exclusion of Landscape Character Types (LCTs) from the assessment due to their broader geographical extent and occurrence across multiple geographical locations	In accordance with the guidelines in GLVIA3, the exclusion of LCTs is considered a proportionate approach given the limited range of the significant effects and the temporary nature of the Proposed Scheme. If the effects were more far reaching and permanent, we	

		would agree but, in this case, the approach we have adopted is considered to be proportionate.	
BO RVBC 73	Disagree that effects at 15 year are imperceptible	The assessment has followed the principle of the Landscape Magnitude of Effects criteria. The new valve house building would be a permanent new structure, in a scale similar to the existing building and clad with a natural stone in keeping with the local vernacular. The building would result in a slight permanent change to the existing landscape elements on a very small proportion of the landscape character area. The buildings therefore, could be considered to have a slight adverse significance of effect or a negligible effect. However, the residual effects are not considered significant.	
BO RVBC 74	Insufficient landscape assessment in respect of off-site highway works and Ribble Crossing	<p>The landscape and visual assessment (LVIA) of the proposed off-site highways works and Ribble Crossing were undertaken fully in accordance with Appendix 6.1 'The Landscape and Visual Impact Assessment Methodology'. Regarding the off-site highway works, site visits were undertaken at all locations to consider the impacts. Design advice was provided where, within the constraints of the site locations, avoidance of features would help reduce temporary or permanent effects. It was agreed with Planning Officers at Ribble Valley Council that a summarised approach to reporting would be appropriate at this earlier stage of design and is based on a worst case of loss of features within the redline boundary and full reinstatement following the principles set out in Volume 5 and Volume 2 Chapter 6.</p> <p>The LVIA carried out in relation to the Ribble Crossing is considered to be robust and the conclusions are reported in Volume 6 Chapter 6 of the ES.</p>	
BO RVBC 75	Appearance of hoarding, other boundary treatment and structures needs to be in keeping	United Utilities note that a condition has been recommended requiring that the final specification of the site compound structures including offices, welfare cabins, hoardings and fences be submitted to and agreed by the planning authority before any	

		works commence. We would support the use of the recommended condition, which would be discharged prior to the commencement of the development.	
BO RVBC 76	Query regarding the valve house building location site selection. The building would have slight adverse visual impact rather than negligible	The location of the proposed valve house building is constrained by the interface between the new and replaced sections of aqueduct. The new valve house building would be a permanent new structure, in a scale similar to the existing building and clad with a natural stone in keeping with the local vernacular. The building would result in a slight permanent change to the existing landscape elements on a very small proportion of the landscape character area. The building therefore, could be considered to have a slight adverse significance of effect or a negligible effect. However, the residual effects are not considered significant.	
BO RVBC 77	Assessment of inter-project effects unclear in terms of landscape impacts	An assessment of inter-project cumulative effects is included in Volume 2 Chapter 6 of the ES. No inter project effects have been identified. The assessment also considers intra project cumulative effects (i.e., within the Proposed Bowland and Marl Hill Sections and wider HARP programme).	
BO RVBC 78	Cumulative effects - tree loss - based on 'at risk' assessment i.e., not worst case? Also, how does the assessment consider cumulative effects?	The assessment assumes 'at risk' features would be lost in order to ensure a reasonable worst-case assessment and to inform adequate mitigation. Notwithstanding this, every effort would be made to retain 'at risk' features wherever possible in accordance with the mitigation hierarchy. It is considered that the submission of final designs and reinstatement proposals for each highway modification location could be the requirement of a suitably worded planning condition.	
BO RVBC 79	Offsite highways landscape impacts should not have been treated differently to landscape and should have been assessed in Vol 2	The landscape and visual assessment (LVIA) of the proposed off site highways works was undertaken fully in accordance with Appendix 6.1 'The Landscape and Visual Impact Assessment Methodology'. Site visits were undertaken at all locations to	

		consider the impacts. Design advice was provided where, within the constraints of the site locations, avoidance of features would help reduce temporary or permanent effects. It was agreed with Planning Officers at Ribble Valley Council that a summarised approach to reporting would be appropriate at this earlier stage of design and is based on a worst case of loss of features within the redline boundary and full reinstatement following the principles set out in Volume 5 and Volume 2 Chapter 6.	
BO RVBC 80	It is likely that the extent of the construction areas and construction easements assessed in this report may be greater than will be required	The statement seeks to confirm that a reasonable worst-case assessment has been undertaken i.e., we consider it likely that the effects can be further reduced through detailed design, but no additional land take would be required to facilitate the works.	
BO RVBC 81	Offsite highways works figures in Vol 5 not suitably detailed	<p>The figures presented in Volume 5 of the ES are considered to be suitably detailed to establish the potential for likely significant effects and to inform appropriate mitigation. It was agreed with Planning Officers at Ribble Valley Borough Council that a summarised approach to reporting would be appropriate at this earlier stage of design and is based on a worst case of loss of features within the redline boundary and full reinstatement following the principles set out in Volume 5 and Volume 2 Chapter 6.</p> <p>Supplementary aboricultural survey data in relation to the proposed off-site highway modifications is included as part of the SEI.</p> <p>It is considered that the submission of final designs, accompanied by tree protection plans, arboricultural method statements and reinstatement proposals for each highway modification location could be the requirement of a suitably worded planning condition. We have adopted a conservative approach in assuming loss of all 'at risk' features. The off-site biodiversity net gain proposals</p>	

		account for replacement tree planting in order to secure a ratio of 3:1.	
BO RVBC 82	Comments on CCoP	United Utilities note that a condition has been recommended requiring the preparation of a detailed Construction Environmental Management Plan (CEMP) for submission to the Local Planning Authority. We would support the use of the recommended condition, which would be discharged prior to the commencement of the relevant works phase to which the CEMP relates. It is considered that comments made in respect of the Construction Code of Practice could be addressed during the preparation of the CEMP.	
BO RVBC 83	Comments on Volume 4 Appendix 20.2: Planting Proposals	<p>New planting would be grown from native seed sourced from an appropriate seed zone.</p> <p>Regarding the inclusion of Scots Pine in the Planting Proposals, following discussions with our arboriculturalist, it is understood that the greatest risk of Dothistroma Needle Blight spreading is within large plantations of Scots pine. Mixed and diverse planting with Scots pine as a small ratio limits the risk. The mixes have been discussed with project Ecologist and Arboriculturalist and are found within the study area and provides natural diversity.</p> <p>The removal of hedgerows has been avoided wherever possible. Removed hedgerows that are considered ordinary, i.e., do not fall within the criteria for Important hedgerows within the 'Hedgerow Regulations 1997', have been replanted with a species mix that provides a greater diversity. No Important hedgerows would be impacted by the works proposed in this planning application.</p> <p>Appendix 20.2 'Planting Schedules' has been updated to include provision for cell grown stock.</p> <p>United Utilities note that a number of conditions have been recommended by the AONB's Landscape Advisor, one of which</p>	

		includes the preparation and submission of further information regarding planting proposals. United Utilities support the principle of the proposed conditions being imposed but would request that these be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.	
BO RVBC 84	Planting around valve building should be proposed	Planting around the new valve house building is constrained by the presence of / proximity to below ground apparatus. Trees and hedgerows are proposed where considered in keeping with the landscape character. Our strategy has been to ensure the structures are typical in appearance to agricultural out-buildings present throughout the local area and thus in keeping with the landscape character.	
BO RVBC 85	Comments regarding planting proposals shown on Environmental Masterplan Drawings.	See response to RVBC BO 83 above	
BO RVBC 86	No details of the surfacing materials to be used for the access tracks have been provided	United Utilities note that a number of conditions have been recommended by the AONB's Landscape Advisor, one of which requires that all materials used for temporary access tracks and parking areas should be surfaced with locally sourced stone to minimise their effects on views. Where practicable, these areas should be oversewn with grasses to create a locally typical farm track type appearance to further aid their assimilation in the landscape. United Utilities support the principle of the proposed condition.	
BO RVBC 87	Given the quantity of material generated by the tunnel boring and soil stripping works I am surprised that there are no proposals to use some of this to provide temporary screen bunds. If this idea was considered and ultimately ruled out, it would be appreciated if an explanation of the reasons behind this decision could be provided.	The vast majority of arisings from the tunnel excavation works would be crushed stone. The plans include for the temporary storage on site of both subsoil and topsoil for use in reinstatement, up to a height of 2m. The use of bunds to screen views was considered during the design process but was discounted because:	

		<ul style="list-style-type: none"> The very large scale of the compounds meant that there would be little benefit from the strategic placement of 2m high bunds to provide screening Compounds are located away from residential properties where views would be across a much wider area and as a result it was considered that the benefit would be minor 	
BO RVBC 88	Regarding the Ribble and Hodder Crossing bridge designs, the applicant should provide details of what options were considered regarding bridge type and what rationale was used to choose the final one.	The need to minimise the visual impact of the structures as far as possible was a consideration in the design process, however, the requirement for the crossing to be 'clear span' in order to prevent increased flood risk and erosion issues limits the options available. In order to achieve a clear span across wide watercourses, we are limited to simply supported beam structures that utilise trusses.	
BO RVBC 89	Regarding the Proposed Newton in Bowland Compound Connection Phase Drawing Sheets 1 – 2, the equivalent drawings for the Lower Houses compound connection phase identified temporary landscaping work and an 'Initial landscaping working area.' There are no proposals for this work within the Newton in Bowland compound – why?	The Initial Landscaping Working Area identified on the Lower Houses compound connection phase drawing relates to proposals to utilise surplus material derived from shaft construction in the final landscaping of the site. There are no such proposals at the Newton-in-Bowland compound.	
BO RVBC 90	Comments made in relation to the Lighting Management Plan	United Utilities note that a number of conditions have been recommended by the AONB's Landscape Advisor, one of which requests that a detailed lighting scheme is submitted to the planning authority for approval before any works commence on site. United Utilities support the principle of the proposed condition but would request that it be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.	
BO RVBC 91	Comments regarding the options appraisal process in relation to the Ribble Crossing temporary haul road route and the extent to which likely landscape and visual impacts had a bearing on selection of the preferred option	As set out in Volume 6, Chapter 3 of the Proposed Bowland Section ES, a feasibility study, taking into account environmental, community, constructability, and safety considerations, was undertaken to inform the proposed route of the Ribble Crossing	

		<p>temporary haul road. Consideration of likely landscape and visual impacts was an integral part of the options appraisal process.</p> <p>At the outset of the feasibility study, it was determined that, in order to deliver the necessary benefit i.e., to reduce vehicular movements through residential areas as far as possible, the haul route would need to be accessed from Pimlico Link Road. Other possible accesses from the A59 would have involved movements through residential areas. From Pimlico Link Road, the most direct route to the Ribble impacting fewest sensitive receptors was considered to be north, past the Ribblesdale Cement Works. It was also considered that this route offered advantages due to its proximity to the proposed HGV Holding Area and Park and Ride.</p> <p>From this point, four broad route corridors, as defined in Volume 6, Chapter 3, were considered, all of which involved a temporary crossing of the River Ribble and temporary vehicular access off West Bradford Road between the Ribblesdale Cement Works and existing West Bradford Road Bridge. Within the four corridors, a number of possible alignments were considered, in consultation with affected landowners, tenants, members of the community and technical specialists.</p> <p>West Bradford Route 1 was considered to be the most feasible and advantageous alignment. It was preferred to West Bradford Route 2 as that option would involve all construction traffic travelling past Waddington and West Bradford Primary School. In addition, Waddington Routes 1, 1a and 2, whilst having the benefit of joining Slaidburn Road north of Waddington, would have resulted in substantial tree removal either within, or adjacent to, an area designated as ancient woodland. It was also considered likely to involve significant temporary works with associated environmental impacts. Waddington Route 3 was discounted on the basis that it would require all construction traffic to travel through Waddington</p>	
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		village, reducing the potential community benefits associated with the construction of a temporary haul route.	
BO RVBC 92	Should the planning authority be minded to approve the application, then it is essential that the removal and reinstatement of the Ribble Crossing is the subject of a planning condition. Without this, there is a possibility that the temporary access road could become a permanent by-pass for Waddington. The form of construction the applicant is proposing for the access road would make its conversion to an adoptable highway a relatively straightforward and economical task.	United Utilities is comfortable with the use of a condition requiring the removal and reinstatement of the Ribble Crossing on completion of the construction, commissioning, and reinstatement of the main works at the Newton-in-Bowland, Braddup and Bonstone compounds.	
FOREST OF BOWLAND AONB (ECOLOGY)			
BO RVBC 93	Uncertainty over the conclusions of the Habitats Regulations Assessment, which assumes approval of the application to dispose of tunnel arisings at Waddington Fell Quarry.	The planning application does not allow for disposal of arisings in any other way. If for any reason, there was a change to the strategy for disposal then a new or revised application would be required, and this would need to be accompanied by an assessment of ecology impacts.	Ribble Valley Borough Council to consider use of the recommended conditions.
BO RVBC 94	SPA disturbance impacts appear to have been limited to compounds.	United Utilities can confirm that the assessment includes the Ribble Crossing. The proposed highway modification works have also been taken account of. The scope of works assessed is described in the HRA executive summary and introduction and illustrated in the supporting plans.	
BO RVBC 95	Insufficient information to demonstrate that impacts on Biological Heritage Sites (BHS) are unavoidable and that mitigation & Compensation measures for unavoidable impacts are feasible and deliverable.	SEI appendices B5 (main compounds) and B7 (highways) confirms the approach to avoiding impacts on local wildlife sites and in the limited areas where avoidance is not possible, how impacts would be mitigated and compensated.	
BO RVBC 96	The River Ribble Biological Heritage Site - It has not been fully demonstrated that the proposed crossing is unavoidable or that the location of least ecological impact has been selected.	The Ribble Crossing is required due to size and number of HGV movements requiring access to the Newton-in-Bowland compound and the proposed alignment has taken account of ecological features as part of the iterative design, notably to avoid	

		tree loss and associated species implications. The proposed bridge would be clear span with no in-river works proposed.	
BO RVBC 97	ES Vol 4, Chapter 9A (Para 143) states that the groundwater dependent terrestrial ecosystem assessment is pending. There may be temporary or permanent changes to groundwater conditions giving rise to effects on five Biological Heritage Sites (River Ribble, Waddington Fell & Browsholme Moor, Bradford Fell, Easington Fell & Harrop Fell, Waddington Fell Roadside Verges, Bellman Farm Marsh)	This additional information has been completed and is included in the main SEI document.	
BO RVBC 98	ES Vol 5 Part 2 – Offsite Highway Works TR4, Para 49 indicates that compensation for residual impacts on locally designated sites would be implemented through consultation with the relevant LPA. Firm compensation proposals should be included within the planning application.	The general approach to avoiding and reinstating features impacted by the proposed highway modification proposals is covered in the assessment in Volume 5 of the Environmental Statement. It is considered that the submission of final reinstatement proposals for each highway modification location could be the requirement of a suitably worded planning condition. United Utilities would request that the condition be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.	
BO RVBC 99	Waddington Brickworks Old Working (Ribble Crossing) - The increased isolation of the BHS 74SW04 for the lifetime of the haul road do not appear to have been assessed	There would be no fragmentation. Potential links between the BHS and wider landscape comprise ditch field boundaries. Ditch crossings would take the form of bridges rather than culverts thus allowing for continued movement of species. The haul route would not be enclosed by solid fencing and lighting is not proposed.	
BO RVBC 100	Comments relating to the submitted Biodiversity Net Gain Assessment	As outlined in the submitted reports, additional work was required on the BNG assessment. This has been undertaken and is submitted as part of the SEI. In summary: <ul style="list-style-type: none"> • BNG has been converted into Metric 3.0 • The Rivers Metric has been completed • The highways BNG has been added • The off-setting has been updated 	

		<ul style="list-style-type: none"> Coppid Hill BHS has been removed from offsetting sites as it is already of a high condition. Offsetting sites consider existing species impacts. Metric tables couldn't be submitted on the planning portal but were sent to Ribble Valley Borough Council's ecological advisor along with GIS files. Updated versions have been prepared and can be issued to the AONB's ecological advisor if desired. 	
BO RVBC 101	Concerns over very high distinctiveness (VHD) habitats and veteran trees	<p>SEI Appendices B5 and B7 include a summary of VHDs within the planning application boundary and detail the potential for impacts, avoidance, mitigation, and consideration of alternatives.</p> <p>Tree loss and compensation has been calculated using the BNG metric.</p> <p>Following design refinements, details of which are included in the SEI, no veteran trees would be removed to accommodate the proposed works and land take of fen habitats in Gamble Hole Farm Pastures BHS and along the haul road north of the River Hodder crossing is avoided. The only VHDs that could be temporarily impacted are small areas at three offsite highways works locations. In addition to mitigation measures, high distinctiveness habitats have been compensated for on a 4:1 ratio.</p>	
BO RVBC 102	Does BNG assume worst case?	Yes, United Utilities can confirm that the BNG Assessment assumes worst case. It assumes all 'at risk' features and habitats would be lost as a result of the development, when in reality it would be possible to further avoid and mitigate impacts through detailed design.	
BO RVBC 103	Inadequate assessment of the likely ecological impacts of the proposed highway works and Ribble and Hodder crossings and the necessary avoidance, mitigation, and compensation measures.	<p>Additional technical reports have been provided as part of the SEI:</p> <ul style="list-style-type: none"> Bat trees, hedgerows, and target notes Groundwater Dependent Terrestrial Ecosystem (GWDTE) assessment for highway modification works 	

		<ul style="list-style-type: none"> No lighting proposed, no night-time traffic movements other than shift change. No new kerbs on road widenings and no solid boundaries to haul roads. <p>It is considered that the submission of final reinstatement proposals for each highway modification location could be the requirement of a suitably worded planning condition. United Utilities would request that the condition be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.</p>	
BO RVBC 104	Compensation proposals and biodiversity net gain calculations don't take into account the full impacts of the proposed highway works.	A BNG Assessment covering the proposed off-site highway modifications is submitted as part of the SEI.	
BO RVBC 105	It is not clear from the information submitted with the application that there is no alternative to the proposed highway works that would result in a lower ecological impact.	The number and location of proposed highway modification works has been dictated to a large degree by highway safety considerations. Whilst discussions remain ongoing with Lancashire County Council Highways, United Utilities considers that the proposals are proportionate and strike the correct balance between ensuring highway safety and minimising biodiversity and landscape impacts. The design process included consideration of designations, which have been avoided wherever possible. In addition, the micro-siting of the highway modifications took into account the need to reduce impacts on features of ecological interest as far as possible, within the constraints dictated by highway safety requirements. The assessment in Volume 5 of the Environmental Statement, which has been updated as part of the SEI, represents a reasonable worst case and it is anticipated that the level of impact can be reduced further through detailed design. It is considered that the submission of final reinstatement proposals for each highway modification location could be the requirement of a suitably worded planning condition. United Utilities would request that the condition be aligned to an agreed	

		phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.	
BO RVBC 106	Incomplete protected species surveys, which are required to inform the Environmental Impact Assessment and enable the planning authority to meet its statutory obligations	<p>Additional survey work has been completed since the submission of the planning application, the outputs of which are included in the SEI. This includes breeding bird surveys for the Ribble crossing and additional riverine surveys.</p> <p>Supplementary information relating to the proposed highway modification works is also included in the SEI.</p>	
BO RVBC 107	Some species populations (including bats) and impacts on those populations have been evaluated in the absence of surveys. These evaluations and impact assessments are therefore unreliable	<p>The approach to assessing tree roosting bats was as consulted on in the scoping addendum.</p> <p>The assessment uses ground-level tree assessments alongside transect and static survey data and historical records to identify potential bat species present, assess potential impacts and design mitigation. There is more than sufficient scope within the proposed application to accommodate mitigation if necessary.</p> <p>Tree roost dusk/dawn surveys would be undertaken in advance of and to inform, final compound designs, which United Utilities consider could be the requirement of a suitably worded planning condition.</p> <p>There is sufficient information on impacts and mitigation (i.e., Ecological Management Plan, Lighting Strategy, Construction Code of Practice) for the Local Planning Authority to have confidence that Natural England would issue a licence if required.</p> <p>In their comments made in response to the planning application consultation, Natural England confirm that the Habitat Regulations Assessment undertaken is appropriate.</p>	

BO RVBC 108	Incomplete Protected Species Presence/Absence surveys (Badgers, Barn Owl, Toads)	<p><u>Badgers (roadkill and habitat severance)</u></p> <p>Significant effects were considered and scoped out. Speed limits would be in operation, no night-time traffic movements are proposed, and no lighting or solid barriers would be erected along the proposed temporary haul routes (i.e., Ribble Crossing, Hodder Crossing and access tracks to compound sites). No badger setts in close proximity to the proposed haul roads were identified and repeat surveys would be carried out prior to construction in accordance with a suitably worded planning condition. Significant effects relating to badgers have been scoped out.</p> <p><u>Barn Owl (roadkill and hunting)</u></p> <p>Significant effects were considered and scoped out. There would be relatively small, medium to long term temporary foraging habitat losses, however, there is significant surrounding habitat available to conclude that likely significant effects on this species can be scoped out. Additional review of baseline confirming no likely increase in risk of roadkill is included in the SEI Appendix B7.</p> <p><u>Toads</u></p> <p>Known crossings have been identified during the assessment.</p> <p>No night-time traffic movements are proposed, and no new kerbs are proposed as part of the highway modification proposals.</p> <p>Significant effects relating to toads have been considered and scoped out.</p>	
BO RVBC 109	<p>Incomplete Protected Species Presence/Absence surveys (Otter)</p> <p>ES states that off-site highways works may account for significant effects on otter populations in Bonstone Brook and un-named</p>	<p>The significant effects refer to the potential for impacts to otter populations through habitat degradation from either pollution, temporary disturbance of foraging habitats or loss of habitat connectivity in the absence of mitigation. No licensable activities were identified associated with the road widening areas R22 or</p>	

<p>watercourse 2096 associated with highway work areas R22 and R23. It is not clear whether or not this includes licensable impacts.</p> <p>It appears that road widening location RW02 would affect tree groups within 50m of the River Ribble, close to observed otter evidence.</p> <p>At RW03 and RW04, there would be works immediately adjacent to the River Ribble where evidence of otters has been observed and where trees providing potential holt sites amongst their roots have been identified. Trees are shown to be at risk of removal in this.</p> <p>Evidence of otters and potential places of shelter (holts/couches) have been identified in the vicinity of the River Ribble Crossing. Table 9.6 of ES Vol 6 – Proposed Ribble Crossing, Chapter 9B (Aquatic Ecology) states that the Ribble crossing may result in the removal of potential holt and couches. If these are used by otters, then a licence from Natural England would be required before the scheme could commence. It will need to be demonstrated that no licence is required or that all licensing tests are met, otherwise, an alternative crossing point will need to be proposed, which avoids licensable impacts on otters.</p> <p>Otters are known to occur in the vicinity of the proposed Hodder Crossing, and data submitted with the planning application highlights field evidence in the vicinity of the planning application boundary as well as an otter holt nearby. It will need to be demonstrated that licensable impacts on otters will be avoided, or that the licensing tests have been met.</p> <p>As well as the risk of killing, injury and disturbance of otters, or destruction of their place of shelter (holts/couches), pollution and sedimentation could also have significant effects on otter, for example, by affecting the availability of prey species.</p>	<p>R23. No significant effects were identified when taking into account the proposed mitigation identified relating to the water environment (Chapter 7) and ecology (Chapter 9).</p> <p>Road widening locations RW01 to RW07 no longer form part of the proposed scheme.</p> <p>Further clarification on the justification of the otter assessment and approach to mitigation and potential licensing in relation to the Proposed Ribble Crossing is included in the SEI along with the results of a repeat otter survey for this location.</p>	
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BO RVBC 110	<p>Concern over scope and timing of water vole surveys.</p> <p>RSK surveys undertaken in 2020 and 2021 include evidence of water voles (including burrows and feeding signs) in locations that would be affected by the proposed development, including the Newton-in-Bowland compound and vicinity. These results and likely associated impacts do not appear to have been addressed within the relevant ES chapters. A licence from Natural England is likely to be required before works affecting water voles and their burrows could commence.</p>	<p>The results of surveys on watercourses relevant to the activities assessed as part of the main ES Chapter 9 have been included in the ES Chapter 9B, including RSK Biocensus and Bowland Ecology. Additional surveys of watercourses associated with the Ribble Crossing, road widening and passing places were undertaken and used in the assessment.</p> <p>The potential water vole evidence identified in the Appendix 9B.3 and RSK biocensus TR3 Otter and Water Vole survey report Appendix, as identified in the report, is not considered to be evidence of water voles but highly likely to be attributable to bank vole or brown rat based on the size and of burrows, feeding remains, droppings identified and absence of definitive evidence of water vole at all surveyed watercourses within the relevant catchments.</p> <p>The watercourses identified in the ES Chapter 9 as having activities which would require works in channel or bank side vegetation clearance and hence could impact water voles if present were generally unsuitable or had low suitability. This, in combination with the lack of evidence of water voles at all watercourses surveyed in the wider catchments, indicates that water voles are highly unlikely to be present and as such no licensable activities for water voles are associated with the proposed scheme.</p> <p>The surveys identified as having suboptimal timings were habitat suitability surveys only. These surveys identified that the watercourses were generally unsuitable or low suitability for water voles in areas where direct impacts to these habitats could occur and hence did not require further surveys.</p>	
BO RVBC 111	<p>The ES states that The River Ribble at the proposed crossing point contains suitable habitats to support white clawed crayfish. The presence of suitable habitat at Greg Sike, Waddington Brook,</p>	<p>Although surveys were not undertaken at the watercourses associated with Proposed Ribble Crossing, using a precautionary approach white clawed crayfish were assumed to be present for</p>	

	<p>Coplow Brook and Watercourse 2097 is also acknowledged (or assumed). Section 2.4 states that due to the timing of surveys it was not possible to undertake presence/absence surveys for white clawed crayfish to inform the ecological impact assessment. As per the requirements of the NPPF (and associated circular 06/2005) stated above, these surveys/assessments will need to be completed before the application is determined.</p>	<p>the purposes of the assessment where potentially suitable habitat was identified.</p> <p>No records of white clawed crayfish were received from LERN for within 2 km of the proposed scheme in the period 2010 to 2020. In addition, white clawed crayfish were not present in macroinvertebrate monitoring data recorded at sites in the Ribble Downstream Stock Beck waterbody during the period 2010 to 2020. White clawed crayfish are unlikely to occur in the River Ribble where in channel works to install the temporary outfalls are required.</p> <p>The mitigation identified for the proposed works include restrictions on timings of in river works, pollution prevention, biosecurity, pre commencement checks for protected species and the appointment of an Ecological Clerk of Works (ECOW). The identified mitigation is considered sufficient to prevent impacts to white clawed crayfish if they were present in the watercourses.</p> <p>The precautionary approach used for the assessment of impacts to white clawed crayfish for the scheme, including the proposed Ribble Crossing, means that undertaking presence absence surveys (at the associated watercourses only subject to habitat suitability) is highly unlikely to change the outcome of the assessment or mitigation requirements.</p>	
BO RVBC 112	<p>Insufficient information to demonstrate that the mitigation hierarchy has been applied to all elements of the scheme in accordance with the requirements of the NPPF.</p>	<p>Information on the iterative approach to scheme design, considering all environmental topics and engineering feasibility to apply the mitigation hierarchy, has been provided and discussed throughout the pre-application consultation, is presented within Chapter 3 of the ES and further information is within the Chapter 9 of the ES. Approaches include:</p> <ul style="list-style-type: none"> Careful selection of works locations, avoiding habitat loss and impact on designations wherever possible, taking into account the requirement for works to be carried out in 	

		<p>certain locations due to proximity to existing infrastructure or to ensure highway safety (regarding the location of proposed highway modifications)</p> <ul style="list-style-type: none"> • Red line boundaries have been drawn to exclude features where possible. • Firm commitments are made to retain some features within red line boundaries • Firm commitments are made to execute the works in a manner which mitigates potential impacts, as set out in the Mitigation Schedule and Construction Code of Practice 	
BO RVBC 113	There is uncertainty over the extent of habitat loss, and therefore also uncertainty over the likely impacts on protected and priority species and their habitat.	A reasonable worst-case scenario has been adopted and mitigation proposals developed on that basis. The assessment only assumes habitat retention when it is certain and is committed to in the application. Residual habitat losses would be compensated for through the implementation of on and off-site biodiversity net gain strategies.	
BO RVBC 114	There is uncertainty over the feasibility of mitigation/compensation for some of the predicted ecological impacts.	Where there is uncertainty in mitigation this is stated and the assessment assumes reasonable worst case. Where compensation is proposed this is described after residual effects.	
BO RVBC 115	Conflicting statements about bat trees in Ribble Crossing	The SEI (appendix B6) clarifies that the statements regarding bat trees affected by the Ribble Crossing are not conflicting.	
BO RVBC 116	Inconclusive offsite Great Crested Newt (GCN) eDNA result	Appendix B5 of the SEI confirms there are no positive or inconclusive eDNA results for ponds within 500m.	
BO RVBC 117	Licensing tests for Bats, Otter and GCN	There is sufficient information on impacts and mitigation (i.e., Ecological Management Plan, Lighting Strategy, Construction Code of Practice) for the Local Planning Authority to have confidence that Natural England would issue a licence if required.	

		In their comments made in response to the planning application consultation, Natural England confirm that the Habitat Regulations Assessment undertaken is appropriate.	
BO RVBC 118	The habitat survey for the Ribble crossing and haul road has been undertaken in winter, meaning that various species may not have been apparent and accurate assessment of habitat quality would have been compromised. This is not sufficient to demonstrate that the route of least ecological impact has been selected or to inform mitigation and compensation requirements.	<p>The entire site has been surveyed. It is dominated by heavily managed improved grassland, additional walkovers during early 2021 and during breeding bird surveys confirmed the correct identification of habitats.</p> <p>The proposed alignment avoids boundary features except where crossings required, and these seek to use existing gaps in vegetation.</p>	
BO RVBC 119	Recommendation of various conditions	United Utilities would support the use of the recommended conditions which would be discharged when the contractor has been appointed. United Utilities would request that the conditions be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.	
CRAVEN DISTRICT COUNCIL			
BO RVBC 120	No comments	No response required	No further action required
OFFICE FOR NUCLEAR REGULATION			
BO RVBC 121	With regard to planning application 3/2021/0660, ONR makes no comment on this proposed development as it does not meet ONR's consultation criteria	No response required	No further action required
LEAD LOCAL FLOOD AUTHORITY (LANCASHIRE COUNTY COUNCIL)			

BO RVBC 122	<p>The Lead Local Flood Authority has no objection to the proposed development, subject to the inclusion of the following conditions, in consultation with the Lead Local Flood Authority:</p> <p><u>Condition 1 (Development in accordance with the submitted Flood Risk Assessment):</u></p> <p>The development permitted by this planning permission shall be carried out in accordance with the principles set out within the submitted flood risk assessment and outline drainage strategies:</p> <ol style="list-style-type: none"> 1. Document name: Proposed Bowland Section Environmental Statement Volume 2 Chapter 8: Flood Risk, Reference: LCC_RVBC-BO-ES-008 Rev:0, Dated: June 2021, Prepared by: Jacobs. 2. Document name: Proposed Bowland Section Environmental Statement Volume 4 Appendix 8.1: Flood Risk Assessment, Reference: LCC_RVBC-BO-TA-008-001, Rev: 0, Dated: June 2021, Prepared by: Jacobs. 3. Document name: Volume 6 Proposed Ribble Crossing Appendix 8.1: Flood Risk Assessment, Reference: LCC_RVBC-BO-RC-TA-008-001, Rev: 0, Dated: June 2021, Prepared by: Jacobs. <p>The measures shall be fully implemented prior to first occupation of any dwelling and in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority in consultation with the Lead Local Flood Authority.</p> <p><u>Condition 2 (Final Sustainable Drainage scheme to be submitted):</u></p> <p>No development shall commence until a final, detailed surface water sustainable drainage scheme has been submitted to, and approved in writing by, the local planning authority.</p>	<p>United Utilities would support the use of the recommended conditions which would be discharged when the contractor has been appointed. United Utilities would request that the conditions be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.</p>	<p>Ribble Valley Borough Council to consider use of the recommended conditions.</p>
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	<p>The sustainable drainage scheme shall be based upon the submitted flood risk assessment and sustainable drainage principles set out in the National Planning Policy Framework, Planning Practice Guidance and Defra Technical Standards for Sustainable Drainage Systems. No surface water shall be allowed to discharge to the public foul sewer(s), either directly or indirectly. The detailed sustainable drainage scheme shall include, as a minimum:</p> <p>a) Final sustainable drainage plans, appropriately labelled to include:</p> <p>i. A final surface water drainage layout plan showing all pipe and structure references, dimensions and design levels.</p> <p>ii. A plan identifying the areas contributing to the surface water drainage network, including surface water flows from outside the curtilage as necessary.</p> <p>iii. Details of all sustainable drainage components, including landscape drawings showing topography and slope gradient as appropriate.</p> <p>iv. Flood water exceedance routes in accordance with Defra Technical Standards for Sustainable Drainage Systems.</p> <p>v. Finished Floor Levels (FFL) in AOD with adjacent ground levels for all sides of each building.</p> <p>vi. Details of proposals to collect and mitigate surface water runoff from the development boundary.</p> <p>vii. Measures taken to manage the quality of the surface water runoff to prevent pollution, protect groundwater and surface waters, and deliver suitably clean water to sustainable drainage components.</p>		
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	<p>b) A full set of sustainable drainage flow calculations for the surface water drainage network. The calculations must show the full network design criteria, pipeline schedules and simulation outputs for the 1 in 1 year, 1 in 30 year and 1 in 100-year return period, plus an additional 40% allowance for climate change. Surface water run-off must not exceed the green field run off rates mentioned in Proposed Bowland Section Environmental Statement Volume 2 Chapter 8: Flood Risk, Proposed Bowland Section Environmental Statement Volume 4 Appendix 8.1 and Volume 6 Proposed Ribble Crossing Appendix 8.1: Flood Risk Assessment.</p> <p>The scheme shall be implemented in accordance with the approved details prior to first occupation of any of the approved dwellings.</p> <p><u>Condition 3 (Construction Phase Surface Water Management Plan):</u></p> <p>No development shall commence until details of how surface water and pollution prevention will be managed during each construction phase have been submitted to and approved in writing by the local planning authority. Those details shall include, as a minimum:</p> <p>a) Measures taken to ensure surface water flows are retained on-site during construction phase(s) and, if surface water flows are to be discharged they are done so at a restricted rate to be agreed with the Lancashire County Council LLFA.</p> <p>b) Measures taken to prevent siltation and pollutants from the site into any receiving groundwater and/or surface waters, including watercourses, with reference to published guidance.</p>		
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	<p>The development shall be constructed in accordance with the approved details.</p> <p><u>Condition 4 (Operation and Maintenance Plan & Verification Report of Constructed Sustainable Drainage System):</u></p> <p>No building hereby permitted shall be occupied until a Verification Report and Operation and Maintenance Plan for the lifetime of the development, pertaining to the surface water drainage system and prepared by a suitably competent person, has been submitted to and approved by the Local Planning Authority.</p> <p>The Verification Report must demonstrate that the sustainable drainage system has been constructed as per the agreed scheme (or detail any minor variations), and contain information and evidence (including photographs) of details and locations (including national grid reference) of inlets, outlets and control structures; landscape plans; full as built drawings; information pertinent to the installation of those items identified on the critical drainage assets drawing; and, the submission of an final 'operation and maintenance manual' for the sustainable drainage scheme as constructed.</p> <p>Details of appropriate operational, maintenance and access requirements for each sustainable drainage component are to be provided, with reference to published guidance, through an appropriate Operation and Maintenance Plan for the lifetime of the development as constructed. This shall include arrangements for adoption by an appropriate public body or statutory undertaker, and/or management and maintenance by a Management Company and any means of access for maintenance and easements, where applicable. Thereafter the drainage system shall be retained, managed and maintained in accordance with the approved details.</p>		
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GRINDLETON PARISH COUNCIL

<p>BO RVBC 123</p>	<p>We welcome the marshalling area for HGVs and booked delivery system as proposed within Ribblesdale Cement Works. However, the number of HGVs and AILs suggested is far too excessive to be acceptable in the environs of Grindleton Parish Council.</p> <p>The use of escorted convoys proposed for large vehicles will be needed for 79 weeks of the project averaging 4 convoys per day with a maximum of 16 convoys per day.</p> <p>The traffic volume is spelled out in the transport planning document. Along the West Bradford Road, it states an additional 167 vehicle movements per day including 141 HGVs – this is 262% increase in HGV movements. This is a very considerable volume of heavy traffic vehicles at peak times. The transport statements say the effect will be slight to moderate, however this depends on perception of course. For those living in the properties along the route, it will be unacceptable!</p> <p>In the plans it is stated that noise reduction barriers will be installed at Waddington primary school, this demonstrates UU accept that the noise will be detrimental, yet we have residents all the way down from the center of Chatburn through Grindleton to West Bradford where the vehicles will be passing within 3m of the front door and no talk of noise reduction or vibration impact on these properties. This is unacceptable in the rural setting of narrow lanes.</p> <p>It is concerning that existing large vehicle have not been factored in to the equation i.e., tractors, farm deliveries, caravan deliveries, buses plus others, as these can cause traffic jams on normal day to day journeys.</p> <p>Will there be an independent analysis of usage/vehicles? It is stated that changes could be made following on-going monitoring</p>	<p>Planning application 3/2021/0660 included two options for the routing of construction traffic to the proposed Newton-in-Bowland. Route Option 1 comprises two routes along the existing highway network. General construction traffic below 3.5m in height would be routed from the A59 through Waddington and north along Slaidburn Road whilst larger vehicles would be routed through Chatburn, Grindleton, West Bradford and the north of Waddington. Route Option 2 ("the Ribble Crossing") would involve the construction of a new temporary crossing of the River Ribble between a point on West Bradford Road just south of the existing road bridge and a point off West Bradford Road to the north, approximately 50m to the west of Waddington and West Bradford primary School.</p> <p>On review of feedback received from members of the public and parish councils during the planning application consultation period, it is apparent that the majority of respondents favour the Ribble Crossing over Route Option 1. In acknowledgement of this feedback, United Utilities has amended planning application 3/2021/0660, confirming that the Ribble Crossing would be implemented and used to facilitate the construction of the Proposed Bowland Section.</p> <p>The construction of the Ribble crossing is anticipated to take approximately 9 months in total and would also be required for access to the proposed Braddup and Bonstone compounds in connection with the Proposed Marl Hill Section (3/2021/0661). It is envisaged that access to the northern extent of the Ribble Crossing, off West Bradford Road between Waddington and West Bradford, would be required to construct the temporary haul route. For this reason, and to enable simultaneous construction of the Hodder and Ribble Crossings, United Utilities is seeking flexibility to use Route Option 1 during the enabling works phase; a period lasting no more than 9 months. Construction traffic would</p>	<p>No further action required.</p>
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	<p>if necessary. There does not appear to be an alternative if this route is chosen.</p> <p>Parking restrictions on the route via Ribble Lane and East View will be strewn with difficulties, in part due to parked vehicles. There is no alternative for the residents that would be practicable and be safe due to a lack of pavements and virtually no street lighting in the area for the duration of the project.</p> <p>The report suggests the reduction of the speed limit to 30 mph; this speed will not be safe for other road users who encounter such large vehicles, especially pedestrians, cyclists and horse riders. There is a fear that HARP drivers may become complacent as they become familiar with the roads and increase speed.</p> <p>The report suggests additional road and vehicle signage: two-way traffic control on Grindleton bridge, three-way control Grindleton Road /East view and several more two-way traffic controls at passing place along West Bradford Road. Whilst it would be necessary for safety reasons IF this route is chosen; traffic lights will considerably slow and inconvenience the local population</p> <p>-emergency vehicles could be seriously delayed by the traffic controls and even more so by any potential, but very likely traffic jams. The route from Chatburn to Grindleton is the designated route for all emergency vehicles.</p> <p>-it will be difficult to work around the school buses as they have a very varied routine.</p> <p>-local buses are an integral part of rural life for those without cars, who need to access services such as medical appointments and shopping.</p>	<p>be routed along the Ribble Crossing as soon as it is constructed. All construction traffic associated with the tunnel construction works would use the Ribble Crossing. On completion of construction works, the Ribble Crossing would also be used for any traffic associated with the commissioning of the new tunnels and reinstatement of associated compounds and would be fully reinstated on completion of all other works.</p> <p>The anticipated type and number of HGV movements requiring access along the existing road network during the enabling works phase is set out in the updated Construction Traffic Management Plan. There would only be a very infrequent requirement for HGVs to travel through Chatburn, Grindleton and West Bradford. On this basis, United Utilities is proposing that such movements would be managed without the need for the implementation of highway modifications currently proposed (RW01 to RW07).</p> <p>United Utilities acknowledge that appropriate surveys of all structures potentially impacted by the proposed scheme would need to be carried out, however, it is considered that such works would form part of the Contractor's detailed design and therefore the submission of any findings, in addition to details of any necessary remedial works, is covered in the highways agreement.</p> <p>As set out in the Planning, Design and Access Statement submitted in support of the planning application, whilst the majority of remaining highway modification works would be constructed within highways land, some would require access to and / or construction on private land. This may require the temporary removal of field boundaries such as dry-stone walls, and the removal of trees and hedgerows. Tree and hedgerow reinstatement plans would be developed in conjunction with the landowners. The highway modification works would be delivered during the enabling works phase, and it has been assumed that:</p> <ul style="list-style-type: none"> • All passing places would be reinstated 	
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	<p>They are also used by tourists to allow them access to walking routes.</p> <p>Tourism is a key part of RVBC's core strategy commitment.</p> <p>Considering all the traffic lights and vehicle movement increases, we can predict that the local traffic will be displaced and be forced to go through Grindleton to Sawley. This will take excess traffic passed Grindleton Primary School and Bowland High School and on to the A59 which is already an accident black spot.</p> <p>The report suggests, ... "Establish a sustainable and proportionate approach to help ensure that the character and distinctiveness of the AONB is retained as far as is reasonably practicable". What is reasonably practicable? What happens in the event of not being reasonably practicable? Following vegetation clearance how long will it take to replace vegetation to its present state?</p> <p>It is stated that road widening will be carried out on narrow sections of road and tight bends. i.e., Grindleton Bridge, East View junction and areas of Grindleton Road to West Bradford. We require guarantees that all road widening be removed immediately after the project ceases. The narrow lanes are a feature of our locality and make it distinct from the urbanisation of Clitheroe. We would also insist that walls and railings be rebuilt with original materials as our residents choose to live here to enjoy its appearance and appreciate its history as in the stone walls which have been in situ since C19.</p> <p>We ask you make reinstatement to "original as found" a condition of any works undertaken. The attributes of our village are indicative of the rural environs of the Forest of Bowland AONB.</p> <p>There is concern that possible damage to houses and roads (including culverts) along this route has not been addressed.</p>	<ul style="list-style-type: none"> Sections of road widening involving works outside of the highway boundary would be reinstated Sections of road widening within the highway boundary would be retained permanently, provided they do form part of a protected verge or within the boundary of a Biological Heritage Site, following completion of the construction works. Hedgerows and / or walls removed to accommodate temporary works would be reinstated All associated temporary compound accesses would be reinstated <p>The impact of the highway modification proposals (RW23) on Bradford Fell, Easington Fell and Harrop Fell Biological Heritage Site has been assessed in Volume 5 of the submitted Environmental Statement. The footprint of the proposed works affecting this BHS are very small in what is a large designation. A precautionary approach to the assessment of effects upon the designation has been adopted. A Groundwater Dependent Terrestrial Ecosystem assessment has been undertaken and has been updated and further details are provided as part of the SEI. It is considered that the submission of final reinstatement proposals for each highway modification location not to be retained permanently could be the requirement of a suitably worded planning condition. United Utilities would request that the condition be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.</p> <p>Regarding the potential for the implementation of the Ribble Crossing to impact on flooding upstream, a quantitative site-specific flood risk assessment has been completed and is submitted as part of the SEI. The flood risk assessment concludes that the Ribble Crossing would not increase flood risk upstream.</p> <p>Regarding the possible impact of the Ribble Crossing on a high-pressure ethylene pipeline, United Utilities will engage in dialogue</p>	
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<p>Who will pay for other required improvements? i.e., upgrade of Chatburn - Grindleton permissive path to allow at least one safe space for pedestrians?</p> <p>Grindleton Road is classed as a "rural single carriageway with two lanes." In many parts it is not 2 lanes wide and passing places that have been created by vehicles running off the road are used. These are not designated passing places.</p> <p>We see in the planning that road widening onto and off Grindleton bridge is to be made if route 1 is used. We need to bring to everyone's attention that the river floods at this point a couple of times a year at least. Any structure built will need to be very substantial to withstand being damaged and swept away.</p> <p>This leads us to then having concerns about the increased flood risk of houses on East view and The Spinney as the natural flood route for the river will be obstructed.</p> <p>The questions this raises are: Will residents need to inform their insurance companies of this work and would they then end up with increased insurance premiums? Can they claim from UU or RVBC as approving the plans if their houses are subsequently flood over the 6-10yrs of this project? What compensation will they be entitled to?</p> <p>We want to bring it to your attention that in the last couple of years otters have established themselves at Grindleton bridge. If the ramp work onto the bridge goes ahead this will be right alongside if not on top of the otters' holt.</p> <p>It is an offence under section 9 and 11 of the wildlife Act 1981 to "kill, disturb or injure" please write back to us directly and to the Ribble Rivers Trust to explain how you intend to carry out this work without contravening this act.</p>	<p>with the operators of the pipeline (SABIC UK) to ensure the detailed design and construction of the Ribble Crossing incorporates adequate mitigation and control measures to avoid any impact on the integrity or operation of the pipeline.</p> <p>There is not considered to be a risk of utility services in the highway being affected by construction traffic given the standard depth of cover of such services.</p>	
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<p>OPTION 2 -RIBBLE CROSSING is a new temporary road from the Clitheroe side of the West Bradford Bridge, over a temporary bridge to cross the River Ribble, through farmland and out onto Waddington Road just west of the Waddington & West Bradford school.</p> <p>This option would avoid all the above works (option 1) in Chatburn, Grindleton and West Bradford.</p> <p>Noise at Waddington school is recognised as an issue during the construction phases – but if route 2 were used then traffic noise would equally be an issue and pupil safety be a consideration if the excessive number and large vehicles pass the school. The Ribble crossing would reduce traffic flow directly in front of the school, as it links with the roadway to the east of the school</p> <p>The effects of the route 2 proposal through Chatburn, have not been assessed in as much detail as the river crossing. This implies an unfair bias toward the Chatburn route, whereas the river crossing route has a number of negative comments.</p> <p>The government's vision is to be environmentally aware and give consideration to carbon emissions and environmental impact. The route 1 option has so many impacts which do not tie in with the governments vision i.e., twice as many miles to go via Chatburn/Grindleton route as the Ribble Crossing route to get to the same point. So therefore, greater carbon emissions from vehicles, noise impact on more residents as the traffic is displaced. Impact on wildlife and vegetation will be equally impacted. The thought that The Ribble Crossing route has a greater impact on the river Ribble is very misplaced as on the Chatburn/Grindleton route the wagons will cross the Ribble in other places and lots of tributaries that feed the Ribble.</p> <p>Loss of verge habitats & degradation of wildlife habitats due to changes in groundwater conditions at Bradford Fell, Easington Fell</p>		
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	<p>& Harrop Fell Biological Heritage site could affect designation. They state protection measures “would be identified”but no detail is given in relation to locally significant permanent losses of trees and woodland. What would these protection measures be and can we be sure they would be put in place?</p> <p>They state “arboriculture statements & landscape reinstatement plans are anticipated.” We require more detail on reinstatement plans following all off site highway works. Mitigation is proposed to leave no lasting effects. How can we be sure of this?</p> <p>An increase in flood risk upstream means there could be significant impact on Grindleton. A detailed assessment has not yet been done. This could be critical for our community and appears to be lacking in detail in this current plan. This is a concern as the properties at the bottom of Grindleton Brow are considered for insurance purposes to be in a flood risk area and insurance premiums are already high due to this considered status.</p> <p>The proposed crossing goes over a high pressure ethylene pipeline that runs along the Ribble Valley- they say this will need a “safe design solution”not yet done and it is urgently needed as it is an accident hazard. This is something that happens all over the country on a regular basis and the method will be well documented, so it is bewildering that they have not completed this task.</p> <p>The final comment in 9.4 states “the (environmental) impacts are largely temporary & acceptable” Based on their own surveys and reports the impacts are significant, will last the best part of a decade and some permanently, so we strongly disagree that these are “acceptable” environmental impacts, especially in a designated AONB.</p>		
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	<p>Noise and vibration: It is suggested that there is not expected to be any uplift in road traffic volumes or changes in vehicle composition or speed following construction. This seems a rather disingenuous statement given the need for the works should Haulage Route 2 go ahead. Clearly there will be a 'negative' change in 'vehicle composition' otherwise why the need for the works?</p> <p>No reference is being made to potential issues around gas and water pipes which could be affected by heavy construction vehicles. Has this been assessed in terms of location/depth etc?</p> <p>If this project goes ahead as proposed, whatever access route is chosen, it will inevitably alter the beauty of our current local landscape and significantly affect the biodiverse and important wildlife of Bowland for years – if not decades – to come.</p> <p>Despite all our grave concerns with regard to the HARP project, we recognise that water improvement is necessary. Our preferred route is the River Ribble crossing as this creates the least impact on the villages of Chatburn, Grindleton and West Bradford.</p>		
BOWLAND FOREST HIGHER DIVISION PARISH COUNCIL			
BO RVBC 124	<p>The above parish council would like to comment that it would be helpful if all other roads in the vicinity i.e., Trough Road, roads through Whitewell, Cow Ark, Bashall Eaves, Leagram and Chipping are not subject to any closures during the period of the HARP works so as not to add to any traffic flow problems in the Hodder Valley.</p>	<p>There is no identified need for road closures in the vicinity of the proposed development and no such closures are proposed at this stage.</p>	<p>No further action required.</p>
COMMUNITY REPRESENTATIONS			
BO RVBC 125	<p>Theme – preference for Haulage Route Option 2 (the Ribble Crossing) vs Haulage Route Option 1 due to concerns around:</p>	<p>Planning application 3/2021/0660 included two options for the routing of construction traffic to the proposed Newton-in-Bowland compound. Route Option 1 comprises two routes along</p>	<p>No further action required.</p>

<ul style="list-style-type: none"> -congestion along Ribble lane in Chatburn; -displaced parking on Ribble lane in Chatburn; -impact on ability of emergency services, public transport and local services (e.g. refuse collections) to move through and park on roads used as part of the haulage route; -noise and air quality impacts associated with routing HGVs through the villages of Waddington, Chatburn, Grindleton and West Bradford, including effects on health and wellbeing of communities; -impact on safety of non-motorised users (e.g. pedestrians walking along Ribble lane to the local primary school); -impact on condition of existing highways; -flooding on East View bridge leading to disruption of diversion of traffic; -impact of construction traffic through Chatburn causing local traffic to take alternative routes causing community, environmental and highway safety impacts; -loss of visitors to Chatburn; -impact on villagers of Grindleton due to 2 way traffic control on Grindleton Bridge, 3 way control at East View and 2 way control at West Clough bridge; -impact on safety of users of footpath between Grindleton and Chatburn; -disruption and additional pollution to villagers of Chatburn, Grindleton, West Bradford and Waddington; 	<p>the existing highway network. General construction traffic below 3.5m in height would be routed from the A59 through Waddington and north along Slaidburn Road whilst larger vehicles would be routed through Chatburn, Grindleton, West Bradford and the north of Waddington. Route Option 2 ("the Ribble Crossing") would involve the construction of a new temporary crossing of the River Ribble between a point on West Bradford Road just south of the existing road bridge and a point off West Bradford Road to the north, approximately 50m to the west of Waddington and West Bradford Primary School.</p> <p>On review of feedback received from members of the public during the planning application consultation period, it is apparent that the majority of respondents favour the Ribble Crossing over Route Option 1. In acknowledgement of this feedback, United Utilities has amended planning application 3/2021/0660, confirming that the Ribble Crossing would be implemented and used to facilitate the construction of the Proposed Bowland Section.</p> <p>The construction of the Ribble crossing is anticipated to take approximately 9 months in total and it is envisaged that access to the northern extent of the Ribble Crossing, off West Bradford Road between Waddington and West Bradford, would be required to construct the temporary haul route. For this reason, and to enable simultaneous construction of the Hodder Crossing, United Utilities is seeking flexibility to use Route Option 1 during the enabling works phase; a period lasting no more than 9 months. Construction traffic would be routed along the Ribble Crossing as soon as it is constructed. All construction traffic associated with the tunnel construction works would use the Ribble Crossing. On completion of construction works, the Ribble Crossing would also be used for any traffic associated with the commissioning of the new tunnels and reinstatement of associated compounds and would be fully reinstated on completion of all other works.</p>	
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<p>-there is a weight limit restricting movement of HGVs through Chatburn. Lifting the restriction could lead to additional traffic travelling through the village;</p> <p>-impact on Chatburn Conservation Area;</p> <p>-impact of vibration on structure of buildings along the route;</p> <p>-impact on nature reserve alongside Crow Trees Brow;</p> <p>-impact on viability of shops and businesses in Chatburn;</p> <p>-homeowners situated along the route will suffer housing blight;</p> <p>-impact on road between West Bradford and Grindleton</p> <p>-impact on non-motorised users, particularly vulnerable groups (e.g. young, elderly and disabled)</p> <p>-Haulage Route Option 1 would present a number of hazards at locations already at risk (Junction of Worston Road and Chatburn Road; Entrance to Shackleton's Garden Centre; Junction of Crow Trees Brow, Bridge Road, Ribble Lane and Old Road in Chatburn; and East View.</p> <p><u>Reasons for Haulage Route Option 2 (the Ribble Crossing)</u></p> <p>-the proposed Park and Ride and HGV Holding Area are conveniently located to the Ribble Crossing;</p> <p>-the Ribble Crossing uses Pimlico Link Road which is fit for purpose for the proposed traffic;</p> <p>-the Ribble Crossing is a safer route for other traffic, pedestrians and cyclists;</p>	<p>The anticipated type and number of HGV movements requiring access along the existing road network during the enabling works phase is set out in the updated Construction Traffic Management Plan. There would only be a very infrequent requirement for HGVs to travel through Chatburn, Grindleton and West Bradford. On this basis, United Utilities is proposing that such movements would be managed without the need for the implementation of highway modifications currently proposed (RW01 to RW07).</p> <p>Draft Heads of Terms to address "Extraordinary Construction Access to the Highway", which includes for obligations relating to monitoring and maintenance has been provided to the Highway Authority for comment. United Utilities is committed to ensuring that there is sufficient provision for necessary monitoring and maintenance of the highway network throughout the construction of the Proposed Bowland Hill Section.</p> <p>The adoption of the Ribble Crossing as the proposed construction traffic access route significantly reduces the requirement for HGV movements along narrow residential routes. In addition, the implementation of a priority passing system on West Bradford Road to the east of Waddington would aid traffic flow and reduce the potential for conflict between vehicles travelling in either direction. In the event planning permission is granted, United Utilities would engage in direct and regular dialogue with Lancashire Police and other relevant emergency service stakeholders through the community/highway liaison group, the formation of which we envisage being the requirement of a Section 106 legal agreement.</p> <p>United Utilities notes that a number of comments made by members of the public have lodged objections against planning application 3/2021/0660 (Proposed Bowland Section) whilst being supportive of 3/2021/0661 (Proposed Marl Hill Section). It is assumed that, based on the general thrust of the comments, the</p>	
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	<p>-communities of Chatburn, Grindleton and West Bradford would not be disrupted;</p> <p>-the Ribble Crossing is not a bus or school bus route.</p>	objection is in respect of Haulage Route Option 1 rather than being in relation to the Proposed Bowland Section as a whole.	
BO RVBC 126	Theme – objection to RW03 (junction of East View and Grindleton Road) and RW04 (East View Bridge) highway modifications due to impact on protected species, potential for silt/hydrocarbon pollution, increased flood risk and damage to the riverbank.	Highway modifications RW03 and RW04 are no longer proposed.	No further action required
BO RVBC 127	Theme - increased flood risk as a result of the proposed Hodder Crossing	A quantitative site-specific flood risk assessment has been completed in respect of the proposed Hodder Crossing and was submitted as part of the original ES. An increase in flooding on agricultural land surrounding the Hodder Crossing has been identified and additional mitigation would be required. Section 3.6 of the FRA (Appendix 8.1 of the ES) discusses these measures in detail. As a result of mitigation options such as floodplain compensation being considered ineffective or impractical, it is proposed to mitigate the predicted adverse impacts through agreement with landowners to compensate them for any temporary loss of productivity or damages incurred as a direct result of the construction of the crossing. With this essential mitigation effectively applied, the ES concludes that the Proposed Bowland Section would have a neutral overall effect on flood risk.	United Utilities to continue engagement with affected landowners
BO RVBC 128	Theme – adverse impact on the village on Newton due to road haulage. Alternative options, such as conveyor, cable car or an extension to the electric tunnel locomotive should have been considered.	As an alternative to transporting tunnel arisings to Waddington Fell Quarry from the Newton-in-Bowland compound via road, the use of either belt conveyor systems or ropeway systems has been considered. Such systems are used in large scale bulk material handling processes (often mining and quarry work). The longer distance systems are usually justifiable in locations where there is limited existing highway infrastructure or transportation distances can be significantly reduced by using them.	No further action required

		<p>The anticipated tunnelling production rates are such that the tonnage per hour of arisings generated would be at the lower end of what such systems are typically used for.</p> <p>For either system an easement (circa 15m wide) would be needed along each route. This would impact a number of field boundaries through the AONB and would impact priority habitats (upland heathland surrounds the quarry) as well as hedgerows and trees.</p> <p>The topography and distance along potential routes, along with the anticipated arisings rates, suggest a ropeway system would be the most applicable system. For a ropeway system it is anticipated that supporting pylons circa 30m high with a ground footprint circa 15m² would be required at an interval of approximately 400m. For the Proposed Bowland Section, the ropeway would be circa 4.2km long with a 220m change in elevation. During operation this would result in a significant new feature in a sensitive landscape. There would also be impacts associated with the construction of any ropeway system, as access to and along the line of any ropeway would be required. In addition, road haulage would still be required to facilitate the delivery of materials (such as tunnel lining), plant, machinery, cabins and personnel to the compound site and thus the proposed highway modifications, temporary crossings of the Ribble and Hodder, HGV Holding Area and Park and Ride facility would still be required. Taking these points into account and given the location within the AONB, it was considered that the proposal to install a ropeway/conveyor system would not meet the tests set out in Paragraph 177 of the National Planning Policy Framework, given that a viable alternative (i.e., road transport) exists.</p> <p>United Utilities acknowledges the community disturbance that would be caused by the Proposed Bowland Section but has sought to mitigate impacts as far as possible through embedded mitigation (HGV Holding Facility, Park and Ride Facility and measures set out in the RVBC Bowland February 2022 CTMP such</p>	
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		as a restriction on HGV movements before 09:00 and between 14:45 and 16:00). In the event planning permission is granted, United Utilities would continue to work with the local community throughout the pre-construction and construction phases to mitigate community disturbance effects in accordance with measures set out in the RVBC Bowland February 2022 CTMP.	
BO RVBC 129	Theme - no consideration of the total environmental impact of the proposed HARP scheme and as a consequence, this application fails to adequately address the Traffic and Environmental impacts of the scheme	<p>An assessment of inter-project cumulative effects is included in Volume 2, Chapter 6 of the ES. No inter project effects have been identified. The assessment also considers intra project cumulative effects (i.e., within the Bowland and Marl Hill Sections and wider HARP programme).</p> <p>An application to use surplus stone arisings from the Proposed Bowland Section in the restoration of Waddington Fell Quarry has been submitted to the Minerals Planning Authority (Lancashire County Council) by the quarry operator. Notwithstanding this, the traffic model developed and used to inform the Transport, Noise and Air Quality Assessments undertaken as part of the Proposed Bowland Section EIA includes for HGV movements to and from the quarry from the Newton-in-Bowland, Braddup and Bonstone compounds thus capturing combined effects.</p>	No further action required
BO RVBC 130	Theme – Haulage Route Option 2 (the Ribble Crossing) should be extended to bypass Waddington	As set out in Volume 6 Chapter 3 of the submitted ES, a feasibility study to identify the optimal route and alignment of the Ribble Crossing was undertaken as part of the design. Three of the options considered bypassed Waddington altogether, joining Slaidburn Road to the north of Waddington (Waddington Routes 1, 1a and 2). Waddington Routes 1, 1a and 2, whilst having the benefit of joining Slaidburn Road north of Waddington, would result in substantial tree removal either within, or adjacent to, an area designated as ancient woodland. These routes would also have involved significant temporary works with associated environmental impacts. For these reasons, an extension of the	No further action required

		<p>Ribble Crossing to bypass Waddington altogether was not considered to be feasible.</p> <p>The CTMP has been updated to provide detail relating to traffic management proposals on West Bradford Road at the north of Waddington. It is intended that a priority passing system would be implemented to ensure vehicles are able to pass safely. The use of temporary signals was considered, however, it was considered that this would cause greater disruption to village residents. The proposals have been designed so as to limit impacts in terms of displaced parking. Further details are provided in the RVBC Bowland February 2022 CTMP.</p>	
BO RVBC 131	Theme – visual impact of the proposed development and impact on visual amenity of neighbouring residents	<p>It is acknowledged that the proposed compounds and Ribble Crossing would be prominent features in the landscape with the potential to impact on the amenity of neighbouring residents. Chapter 20 in Volume 2 of the Proposed Bowland Section ES presents a summary of the mitigation proposed in respect of proposed construction activities. The Chapter also references the Construction Code of Practice (CCoP) (Appendix 3.2 in Volume 4); Schedule of Mitigation (Appendix 20.1 in Volume 4); and Environmental Masterplan (EMP) (Figure 20.1 in Volume 3), which provide further detail on mitigation proposed during construction.</p> <p>Specific measures proposed to reduce impacts on visual amenity include:</p> <ul style="list-style-type: none"> The protection of trees and vegetation on the boundary of proposed compounds through the implementation of measures set out in a Site Specific Arboricultural Method Statement (SS-AMS) and Tree Protection Plan (TPP), which would be submitted to the Local Planning Authority in order to discharge a suitably worded planning condition. United Utilities would request that the condition be aligned to an agreed phasing plan to allow the sequencing of development with discharge of 	No further action required

		<p>conditions aligned to commencement of specific phases of construction.</p> <ul style="list-style-type: none"> • The protection of other landscape features adjacent to the construction site including dry-stone walls, hedgerows, ditches and streams through the implementation of a suitable machinery/plant exclusion zone. • Limiting the height of topsoil storage mounds to 2 m. • Careful specification of hoarding around the compound sites to screen construction activities as far as possible; and • Implementation of advance planting wherever possible to bolster existing screening. 	
BO RVBC 132	Theme – impact on highway safety (Slaidburn Road)	See response to BO RVBC 07.	No further action required
BO RVBC 133	Theme – the application is reliant on desk-based surveys rather than real life information and data	Whilst desk-based surveys are important and have been undertaken as part of the EIA process, they do not act as a substitute for field surveys. A significant number of site surveys have been carried out to inform the EIA and further details regarding the scope of survey work is provided in the topic specific chapters in Volumes 2, 5 and 6 of the Environmental Statement with accompanying survey reports provided in Volume 4.	No further action required.
BO RVBC 134	Theme – HGVs serving housing developments in Waddington are routed through West Bradford due to height restrictions at the Waddington Road railway bridge. This causes disruption and highway safety issues. The proposed works would cause further issues and impact on the health and wellbeing of villagers	There are no proposals to route construction traffic through West Bradford village, apart from during an initial 9-month period in the enabling works phase to enable the construction of the Ribble Crossing and Hodder Crossing, the latter being part of the Proposed Bowland Section (3/2021/0660). The route through Chatburn, Grindleton and West Bradford would only be used by exception and would be limited to no more than 4 HGVs per day. Further information regarding the traffic management controls to be implemented during this period are set out in the RVBC Bowland February 2022 CTMP.	No further action required.

BO RVBC 135	Theme – impact on safety of non-motorised users in Waddington and travelling between Waddington and West Bradford.	See response to BO RVBC 23.	No further action required.
BO RVBC 136	Theme – parked vehicles on West Bradford Road between Waddington and West Bradford cause passing issues	The CTMP has been updated to provide detail relating to traffic management proposals on West Bradford Road at the north of Waddington. The proposals comprise a priority passing system, controlled through the implementation of 2 no. give ways, which would ensure the safe movement of vehicles through what is a narrow section of West Bradford Road. The proposals also provide sufficient refuge areas for pedestrians. Further details are provided in the RVBC Bowland February 2022 CTMP.	No further action required.
BO RVBC 137	Theme – HGVs cause damage to trees overhanging the carriageway leading to branches on the carriageway, impacting flora and fauna	Where the potential for trees overhanging the carriageway to be struck by HARP construction traffic is identified, United Utilities would liaise with the Highway Authority to ensure suitable pruning works are undertaken by a competent arboriculturalist.	No further action required.
BO RVBC 138	Theme – the application is not supported by a robust noise impact assessment considering impact at nearest residential receptors	<p>The noise assessment reported in Volume 2 Chapter 17 of the Proposed Bowland Section ES is considered to be robust. The assessment is informed by baseline noise measurements taken at representative locations in the vicinity of the proposed compounds and along the highway network.</p> <p>An indicative plant list was compiled by the contractor for the main works and construction traffic data, for the peak year of construction (2024), was provided by the Traffic and Transport team. This data was used to allow noise, and where relevant, vibration levels to be predicted and assessed against the construction noise and vibration thresholds and magnitude criteria.</p> <p>Noise and vibration mitigation has considered embedded mitigation, e.g., site hoarding, and Best Practicable Means (BPM), e.g., non-vibratory compaction techniques. Examples of BPM are presented in the Construction Code of Practice (CCoP) and would be used to mitigate impacts as far as practicable. The assessment</p>	No further action required.

		<p>has proposed specific mitigation, including the use of temporary barriers when works are undertaken close to properties.</p> <p>Although increased noise levels are likely to occur during construction works, the effects are predicted to be below the significance thresholds used in the assessment.</p>	
BO RVBC 139	Theme – cheaper option would be to build a reservoir in Manchester rather than waste millions taking a water supply from a rural site.	<p>Volume 2 Chapter 3 of the Proposed Bowland Section ES describes the alternatives considered during the design development process.</p> <p>United Utilities' comprehensive option identification and appraisal process means that, from a very large pool of options, only the most appropriate has been selected in the final Water Resources Management Plan (WRMP). The preferred option, which is the subject of this planning application, delivers the necessary long-term resilience benefits and represents best value to customers. The option assessment process was informed by Strategic Environmental Assessment and an extensive consultation process with regulators and customers. It should also be noted that the Haweswater Aqueduct supplies properties and businesses across Cumbria, Lancashire and Greater Manchester through 18 separate offtakes.</p>	No further action required.
BO RVBC 140	Theme – impact on Forest of Bowland AONB	See response to BO RVBC 02.	No further action required.
BO RVBC 141	Theme – Slaidburn Road is a dangerous road, school children have to be collected by bus. School buses operate between 08:00 and 08:45 and again between 15:30 and 16:30 (on certain days between 14:30 and 15:30). The road cannot accommodate increased vehicle movements during school drop off and pick up times	HGV movements would be restricted between the hours of 08:00 to 09:00 and 14:45 to 16:00 Monday to Friday to avoid traffic impact during school drop-off periods. United Utilities recognises that Clitheroe Royal Grammar School finishes at 14:40 on Wednesdays. The proposed restricted hours would be reviewed with the local schools and agreed with Lancashire County Council Highways, in consultation with the local community, near the	No further action required.

		commencement of construction activities to consider the most up-to-date school schedules.	
BO RVBC 142	Theme – concerns regarding the current condition of Slaidburn Road and the likelihood of further deterioration as a result of the proposed works	A draft Road Condition Monitoring and Maintenance Strategy has been submitted to the Highway Authority for comment. United Utilities is committed to ensuring that there is sufficient provision for necessary monitoring and maintenance of the highway network throughout the construction of the Proposed Bowland Section.	No further action required.
BO RVBC 143	Theme – impact on businesses and tourism within villages of Waddington and Newton due to additional traffic.	As set out in Volume 2 Chapter 14 of the Proposed Bowland Section ES, United Utilities recognises that during the construction works, the villages of Waddington and Newton-in-Bowland would experience disturbance. Disturbance would arise mainly from the movement of heavy goods vehicles through Waddington and along Slaidburn Road to the south of Newton-in-Bowland village. A degree of disturbance is an unavoidable consequence of constructing a major infrastructure project, however, United Utilities has taken a number of steps as part of the scheme proposals to limit disturbance as far as reasonably possible. For example, the Construction Traffic Management Plan (CTMP), outlines a range of measures to be implemented to further mitigate community disturbance, such as a priority passing system on West Bradford Road to the east of Waddington village as an alternative to traffic signals. Through ongoing consultation with local people, local councils and highways authorities, United Utilities would continue to develop and refine mitigation proposals. However, United Utilities acknowledge that in some community areas, such as Waddington and Newton-in-Bowland, it may not be possible to fully eliminate adverse disturbance effects due to the scale of construction operations and associated vehicle movements. A precautionary position is therefore adopted in recognition of the nature, scope and duration of these adverse effects as it is anticipated that some communities would	No further action required.

		<p>experience a disturbance effect that is significant in the context of the EIA Regulations.</p> <p>United Utilities would develop a Stakeholder and Customer Communications Management Plan, which would be regularly updated throughout the duration of work. The plan would set clear objectives and processes on how the work would be delivered to mitigate impacts to customers. A community liaison officer would be appointed to act as a point of contact for community engagement prior to the commencement of the enabling works and during the construction phase.</p>	
BO RVBC 144	Theme – less invasive and damaging alternatives to the scheme should have been considered	<p>The preferred option, which is the subject of this planning application, was selected following a comprehensive option identification and appraisal process, further details of which are included in Volume 2 Chapter 3 of the Proposed Bowland Section ES. The Proposed Programme of Works delivers the necessary long-term resilience benefits and represents best value to customers and has been included within United Utilities' Water Resources Management Plan (WRMP) approved by the Secretary of State and OFWAT. The option assessment process was informed by Strategic Environmental Assessment and an extensive consultation process with regulators and customers. It concluded that alternative options, including those involving works outside the Forest of Bowland AONB, offered insufficient risk reduction to water quality and risk of supply interruptions. The only feasible means of securing a long-term resilient water supply is therefore through replacement all of the tunnel sections of the existing Haweswater Aqueduct, which requires connection into the existing infrastructure at locations within designated areas, including the Forest of Bowland AONB.</p>	No further action required.
BO RVBC 145	Theme – impact on safety of other road users, including non-construction related traffic and non-motorised users (pedestrians, cyclists, equestrians)	<p>The RVBC Bowland February 2022 CTMP details a number of steps taken in design and further measures to be implemented during the pre-construction and construction phases to ensure the</p>	No further action required.

		<p>safety of other road users during the implementation of the Proposed Bowland Section.</p> <p>Control of access to the proposed Newton-in-Bowland, would be effectively managed to prevent construction traffic backing up on the existing highway. During the design of the compound accesses, a conservative approach to visibility splays has been adopted. The access tracks to the compounds would allow simultaneous two-way movements and gatehouses would be situated adjacent to the site compound a significant distance away from the accesses off Slaidburn Road in order to prevent vehicles backing up on entry to the sites.</p> <p>Road safety audits would be carried out and United Utilities commits to implementing the findings of the audit in accordance with the requirements of a suitably worded planning condition. United Utilities would request that the condition be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.</p> <p>Construction traffic associated with the proposed scheme would be limited to 30 mph, as confirmed in the CTMP. The speed of construction vehicles would be monitored in accordance with the measures outlined in the RVBC Bowland February 2022 CTMP and signage urging other road users to take extra care when approaching the compound junctions would be erected. Signage would include warnings for HGV drivers of the presence of non-motorised users within key areas and also for non-motorised users to warn them of the increased presence of HGVs. The CTMP has been updated to incorporate further mitigation measures to ensure the safety of non-motorised users, however, no additional engineering works are proposed.</p> <p>As outlined in Section 6.6 of the RVBC Bowland February 2022 CTMP, a programme of HGV driver training would be</p>	
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		<p>implemented. The programme would have documented procedures. The Contractor's procedures for driver training would provide drivers with clear and concise guidance and assistance relating to the core aspects of a driver's responsibilities, tasks and risks. This process would be monitored periodically for compliance. Professional HGV and PCV drivers are required, by law, to obtain a Certificate of Professional Competence and must complete 35 hours of periodic training every five years to retain the certificate. Upon meeting this criterion drivers are issued with a Driver Qualification Card (DQC) and are required to carry it at all times while driving professionally. The training programme would offer appropriate training to drivers to help them to maintain their Certificate of Professional Competence, this training could be tailored to address some of the challenges of driving along the proposed routes, such as driving during adverse weather. All drivers of HGVs and PCVs would be required to present a valid DQC to security when delivering to any site. The Contractor's methods for undertaking HGV driver training would also include the following:</p> <ul style="list-style-type: none"> • All HGV and PCV drivers would have to complete the contractor's HGV Driver Induction that would include explicit guidance upon the safe use of the proposed routes • The proposed information pack (Section 6.3 above) would include a personal guidance document (a "HGV Driver's Handbook") the induction procedure would include clear guidance upon what is included in the pack • All HGV drivers would have to attend a mandatory prestart briefing such as a Toolbox Talk. The purpose of which would be to communicate a sense of responsibility, encouraging higher driving standards by explaining the importance of compliance. The Toolbox Talk would also provide drivers with information about key hotspot areas for non-motorised users along the routes 	
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		<ul style="list-style-type: none"> At the end of each Toolbox Talk, a declaration would have to be signed by each driver in attendance and retained by the Contractor Frequent HGV drivers working on the project would have to participate in a mandatory toolbox talk as a minimum once per calendar month Any HGV driver on the project failing to satisfy these requirements would be refused entry to all construction sites until they have complied with the minimum requirements The Contractor would be responsible for the routine audit of its Haulage Contractors, and of their sub-contractors, to ensure these requirements are being met Any driver of any vehicle in contravention of the project rules established for control of use of local haulage and access routes would be subject to project disciplinary procedures. This process would be made clear to all at project induction. 	
BO RVBC 146	Theme – concerns around safety issues caused by HGVs speeding through local villages	Construction traffic associated with the proposed scheme would be limited to 30 mph. The speed of construction vehicles would be monitored in accordance with the measures outlined in the RVBC Bowland February 2022 CTMP.	No further action required.
BO RVBC 147	Theme – loss of daylight and vehicle spray as a result of increased HGVs passing residential properties	The number of residential properties passed by HGVs would be greatly reduced as a result of the adoption of the Ribble Crossing as the proposed construction traffic access route. Whilst there would be an increase in HGV numbers on the road network as a result of the proposed scheme, with the implementation of the traffic management measures set out in the RVBC Bowland February 2022 CTMP, it is not considered that this would result in a loss of daylight or spray to residential properties. A community liaison officer would be appointed to act as a point of contact for community engagement prior to the commencement of the enabling works and during the construction phase and would	No further action required.

		respond to any issues of this nature raised by members of the local community.	
BO RVBC 148	Theme – impact on dry stone wall, hedges and trees as a result of highway modification proposals	<p>As set out in the Planning, Design and Access Statement submitted in support of the planning application, whilst the majority of remaining highway modification works would be constructed within highways land, some would require access to and / or construction on private land. This may require the temporary removal of field boundaries such as dry-stone walls, and the removal of trees and hedgerows. Tree and hedgerow reinstatement plans would be developed in conjunction with the landowners. The highway modification works would be delivered during the enabling works phase, and it has been assumed that:</p> <ul style="list-style-type: none"> • All passing places would be reinstated • Sections of road widening involving works outside of the highway boundary would be reinstated • Sections of road widening within the highway boundary would be retained permanently following completion of the construction works. Hedgerows and / or walls removed to accommodate temporary works would be reinstated • All associated temporary compound accesses would be reinstated 	No further action required.
BO RVBC 149	Theme – Haul Route Option 2 (the Ribble Crossing) should be made permanent	On completion of the proposed development, the Ribble Crossing would be reinstated in its entirety in keeping with pre-entry conditions.	No further action required.
BO RVBC 150	Theme – concerns around potential structural impact on West Bradford bridge, which is a Listed feature	It would be necessary for construction vehicles to use West Bradford Bridge during the initial 9 month enabling works period to facilitate construction of the Ribble Crossing. Vehicles would require access to a point just north of the bridge to allow construction of the foundations and installation of the temporary bridge. Further details are provided in the RVBC Bowland February 2022 CTMP. United Utilities acknowledge that an appropriate	No further action required.

		survey of the structure would need to be carried out, however, it is considered that such works would form part of the Contractor's detailed design and therefore the submission of any findings, in addition to details of any necessary remedial works, is covered in the proposed highways agreement.	
BO RVBC 151	Theme – vehicles coming up Branch Road from Waddington have difficulty seeing oncoming traffic when joining West Bradford Road	The CTMP has been updated to provide detail relating to traffic management proposals on West Bradford Road at the north of Waddington.	No further action required.
BO RVBC 152	Theme – impact on the setting of Waddington and surrounding villages	It is acknowledged in Volume 2 Chapter 10 of the Proposed Bowland Section ES that construction traffic passing through the village over an extended period of time would introduce general disturbance, noise and visual intrusion into the setting of the conservation area. United Utilities has sought to mitigate the anticipated adverse effects on Waddington conservation area through the implementation of the Clitheroe Park and Ride, which would reduce the number of vehicles needing to travel through the village and through the deployment of measures set out in the RVBC Bowland February 2022 CTMP. In addition, the adoption of the Ribble Crossing as the proposed route for all construction traffic would remove the need for general construction traffic to travel along the B6478 through Waddington, except for an initial 9-month period to facilitate the construction of the Ribble Crossing. Notwithstanding this there remains a predicted adverse effect, which is concluded as being significant in Volume 2, Chapter 10 of the Proposed Bowland Section ES.	No further action required.
BO RVBC 153	Theme – current issues on the road outside Waddington and West Bradford Primary School. The scheme should fund additional parking provision on land adjoining the Ribble Crossing haul route or land to the west of the school.	The adoption of Haulage Route Option 2 (the Ribble Crossing) would remove the need for construction vehicles to drive past Waddington and West Bradford Primary School, except for infrequent movements during an initial 9-month period to facilitate the construction of the Ribble and Hodder Crossings, as set out in the RVBC Bowland February 2022 CTMP.	No further action required

		<p>The existing issues associated with parking at the school are acknowledged, however, through the implementation of vehicle timing restrictions during the peak school drop-off and pick-up periods, it is considered that the proposed scheme would not worsen the current situation.</p> <p>Whilst United Utilities is not in a position to provide further details on community investment proposals at this stage, in the event that planning permission is granted, our dedicated customer liaison team would maintain close dialogue with the school to identify opportunities to offer support in overcoming the current issues as a legacy benefit of the proposed scheme.</p>	
BO RVBC 154	Theme - surface water on Slaidburn Road during periods of heavy rainfall - proposed road widenings will exacerbate the issue	It is considered unlikely, based on the limited footprint of the proposed highway modifications, that the current surface water management regime would be impacted by the proposed works. Notwithstanding this, it is considered that the submission of detailed designs, including drainage and reinstatement proposals, for each highway modification location could be the requirement of a suitably worded planning condition. United Utilities would request that the condition be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.	No further action required
BO RVBC 155	Theme - damage to road surface and highway structures including culverts, walls and bridges caused by the increase in heavy vehicles.	A draft Road Condition Monitoring and Maintenance Strategy has been submitted to the Highway Authority for comment. United Utilities is committed to ensuring that there is sufficient provision for necessary monitoring and maintenance of the highway network throughout the construction of the Proposed Bowland Section.	No further action required
BO RVBC 156	Theme – Impact on private water supplies	An assessment of the potential impact of the proposed works on Private Water Supplies has been undertaken and the results are reported in Volume 2 Chapter 7 of the ES, identifying mitigation where required. The detailed design of the proposed works would seek to avoid impacts on existing private water supplies, however,	Ribble Valley Borough Council to consider the use of a condition

		<p>where this is not possible an alternative supply would be provided in consultation with the owner. United Utilities would continue to work with affected landowners to refine the assessment and commits to employing appropriate monitoring and mitigation wherever necessary to protect the quality and quantity of supplies.</p> <p>It is anticipated that the Local Planning Authority would seek to use a condition to ensure that the necessary monitoring and mitigation, where necessary, is implemented in full. United Utilities support the principle of such a condition but would request that it be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.</p>	
BO RVBC 157	Theme – traffic estimates taken during lockdown.	United Utilities does not intend to undertake a further traffic impact assessment. The submitted Transport Assessment was prepared in accordance with a methodology agreed with the Local Highway Authority and is considered to be robust.	No further action required
BO RVBC 158	Theme – lack of Consultation	The Statement of Community Involvement outlines chronologically the consultation process United Utilities carried out regarding the HARP proposals, to carry out vital work to maintain the water supply across the North West. It illustrates how United Utilities has clearly demonstrated their commitment to conduct an early and proactive programme of community engagement. United Utilities would continue to engage with stakeholders and the public to inform them about the progress of the development and to seek further feedback from the community.	No further action required
BO RVBC 159	Theme – impact on travel time and congestion on the B6478 between Newton and Clitheroe and impact on livestock transport / slow moving HGVs	Measures are proposed in the RVBC Bowland February 2022 CTMP to reduce disturbance for other road users as far as practicable. For example, no HGVs would be permitted on the route before 09:00 and between 14:45 to 16:00. Drivers would be required to adhere to a clear protocol that ensures they take the utmost care. A community liaison officer would be appointed to	No further action required

		<p>act as a point of contact for members of the community. The community liaison officer would keep in regular contact with farmers and local businesses to understand specific needs as they arise and agree appropriate bespoke measures when possible. For example, in periods outside of peak tunnel production it may be possible to put in place a short duration suspension of HGV movements to accommodate the movement of livestock.</p> <p>It is also important to note that the peak vehicle movements detailed on Figures A-2-01 to A-2-05 of the RVBC Bowland February 2022 CTMP represent the possible worst case. For example, during the busiest phase of construction when both the Bowland and Marl Hill tunnels are under construction at the same time, maximum total daily HGV movements (two movements equates to one vehicle travelling to and from a site) would only very rarely be reached as this would entail both tunnels operating at peak productivity simultaneously which would rarely occur in practice.</p> <p>The predicted average movements present a more representative view of likely typical daily movements.</p> <p>Please also see response to BO RVBC 143.</p>	
BO RVBC 160	Theme – impact on travel time and congestion on the road between Dunsop Bridge and Newton	<p>A staggered junction is proposed between the northern and southern halves of the Newton-in-Bowland compound. Construction traffic movements between the two working areas would be controlled via a banksman, with priority given to other road users travelling along the road between Newton and Dunsop Bridge. Further details relating to the proposed junction design are provided in Figures B-2-11, B-2-12 and B-2-13 of the RVBC Bowland February 2022 CTMP.</p>	No further action required
BO RVBC 161	Theme – Impact on Public Rights of Way	See response to BO RVBC 46.	No further action required

BO RVBC 162	Theme – Ecological impact of the Newton-in-Bowland compound, haul road and Hodder Crossing	<p>See responses to BO RVBC 93 to BO RVBC 119.</p> <p>Following submission of the June 2021 planning application, it was decided to realign circa 400m of the access track to the south of the river Hodder to minimise severance of farmland and reduce the length of road construction within a ground water dependent terrestrial ecosystem (GWDTE).</p> <p>In addition, the provision of a temporary bridge at the Newton-in-Bowland compound to mitigate direct impacts on the Gamble Hole Farm Pasture BHS is now proposed as part of the SEI, as shown on Drawing No. 80061155-01-UU-TR3-97-DR-C-00046.</p>	No further action required
BO RVBC 163	Theme – the application does not include a detailed Construction Traffic Management Plan	<p>The Construction Traffic Management Plan submitted as part of the planning application in June 2021 has been updated to include additional mitigation measures to further mitigate community disturbance, such as a priority passing system on West Bradford Road to the east of Waddington village as an alternative to traffic signals. Through ongoing consultation with local people, local councils and highways authorities, United Utilities would continue to develop and refine mitigation proposals.</p> <p>See response to BO RVBC 143.</p>	No further action required
BO RVBC 164	Theme – inadequate detail relating to construction related carbon emissions and measures to reduce emissions	<p>There would be no requirement for energy-consuming pumping plant or machinery under normal day-to-day operating conditions, and consequently there would be no significant carbon emissions associated with treated water supply. It is acknowledged, however, that HARP would give rise to direct and indirect carbon emissions associated with the enabling works, construction activities, materials usage, and commissioning of the infrastructure before it enters use. The main sources of carbon emissions would include transport and road haulage of surplus materials, the use of diesel generating sets at the construction compounds, and concrete and steel usage in the shafts and tunnel segments.</p>	No further action required

		<p>An estimate of construction related carbon emissions is provided in Volume 2, Chapter 18 of the Proposed Bowland Section ES.</p> <p>United Utilities is proposing to embed carbon and climate agenda-related requirements in the procurement process for consortia seeking to finance, design, build and maintain HARP. These procurement requirements would be a mandatory part of the tendering process and would be carried forward into the contract requirements for the newly-appointed consortia.</p>	
BO RVBC 165	Theme – proposed hours for HGV movements is unclear	No HGV movements would take place before 09:00 nor between 14:45 to 16:00 Monday to Friday to avoid traffic impact during school drop-off periods. The proposed restricted hours would be reviewed with local schools and agreed with Lancashire County Council Highways, in consultation with the local community, near the commencement of construction activities to consider the most up-to-date school schedules.	No further action required
BO RVBC 166	Theme – reinstatement of road widening areas	<p>United Utilities confirms that:</p> <ul style="list-style-type: none"> • All passing places would be reinstated • Sections of road widening involving works outside of the highway boundary would be reinstated • Sections of road widening within the highway boundary would be retained permanently following completion of the construction works. Hedgerows and / or walls removed to accommodate temporary works would be reinstated <p>All associated temporary compound accesses would be fully reinstated to match pre-entry conditions, including the Ribble and Hodder crossings.</p>	No further action required
BO RVBC 167	No plans to widen cattle grids on B6478 / impact on livestock on Waddington Fell	Appropriate surveys of all highway structures potentially impacted by the proposed scheme would be carried out prior to works commencing. Such works would form part of the Contractor's	No further action required

		<p>detailed design and it is envisaged that any findings, in addition to details of any necessary remedial works, such as alterations to existing cattle grids, would be covered in the proposed highways agreement.</p> <p>As outlined in Section 6.6 of the RVBC Bowland February 2022 CTMP, a programme of HGV driver training would be implemented. The Contractor's procedures for driver training would provide drivers with clear and concise guidance and assistance relating to the core aspects of a driver's responsibilities, tasks and risks. One such risk is the presence of livestock on fields adjacent to the road around Waddington Fell.</p>	
BO RVBC 168	Theme – impact on events such as the Hodder Show	We recognise that the local area is a popular destination for tourists, particularly at certain times of year when events, such as the Hodder Show, are held. A community liaison officer would maintain dialogue with Parish Councils and members of the local community throughout the pre-construction and construction period and would seek to ensure that extra effort is made to limit the intensity of construction activities at these times.	No further action required
BO RVBC 169	Theme – impact on road safety on B6478	See response to BO RVBC 07.	No further action required
BO RVBC 171	Theme – impact of tunnel boring in terms of building subsidence	The anticipated depth of the proposed tunnel is such that no significant surface impacts are anticipated. Our contractor would be required to employ construction methods that minimise the impact on existing structures and services. Notwithstanding this, the appointed contractor would also be required to complete detailed assessments for any structures that have the potential to be affected, including timely pre and post construction condition surveys completed by independent engineers.	No further action required
BO RVBC 172	Theme – dust and air pollution	Volume 2, Chapter 18 of the Proposed Bowland Section ES considers the potential air quality impacts associated with the construction and operation of the Proposed Bowland Section.	No further action required

		<p>Chapter 18 includes an assessment of the potential air quality impacts associated with emissions from diesel generators at construction compounds and also road traffic emissions due to the additional vehicle movements on the local road network during construction.</p> <p>Based on baseline data gathered as part of the assessment, the detailed dispersion modelling results indicate that emissions to air from the diesel generators and additional road traffic are unlikely to result in any significant air quality effects at residential properties.</p> <p>Appropriate good practice dust mitigation measures are proposed in the Construction Code of Practice, the implementation of which would prevent significant effects occurring at off-site locations. The measures would also be agreed with the relevant local authorities prior to construction works commencing.</p>	
BO RVBC 173	Theme – Need for a named community representative	<p>United Utilities would develop a Stakeholder and Customer Communications Management Plan, which would be regularly updated throughout the duration of work. The plan would set clear objectives and processes on how the work would be delivered to mitigate impacts to customers. A community liaison officer would be appointed to act as a point of contact for community engagement prior to the commencement of the enabling works and during the construction phase.</p>	No further action required
BO RVBC 174	Theme – Light Pollution / impact on Dark Sky Status	<p>The planning application includes a Lighting Management Plan, which details mitigation measures that would be implemented to reduce adverse impacts on the local landscape due to lighting.</p> <p>For example, temporary construction accesses, off-site highway modification works and temporary proposed haul routes would only be lit by exception where there is a specific security/safety</p>	Ribble Valley Borough Council to consider use of the recommended condition

		<p>issue e.g., at access points, next to a bridge or pedestrian route and subject to a risk assessment.</p> <p>Additional measures that would be implemented include (but are not limited to):</p> <ul style="list-style-type: none"> • Adoption of the lowest safe lighting levels possible for task being undertaken • Limit on the hours of lighting where practicable and use of a luminaire (light) with good optical control • Luminaires to be directed into the area to be lit (i.e., light from the boundary inwards) • Ensure the luminaire is mounted at zero degrees to the horizontal and avoid any tilt • If required, make use of manufacturers supplied custom louvres • Provide local control for the lighting so it may be switched off when not required. <p>United Utilities anticipate the submission to and approval in writing by the Local Planning Authority of a detailed Lighting Management Plan, based on the Contractor's design, to be the requirement of a planning condition. United Utilities would request that the condition be aligned to an agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.</p>	
BO RVBC 175	Theme – The works would lead to noise pollution	<p>The noise assessment reported in Volume 2 Chapter 17 of the Proposed Bowland Section is informed by baseline noise measurements taken at representative locations in the vicinity of the proposed compound and along the highway network.</p> <p>An indicative plant list was compiled by the contractor for the main works and construction traffic data, for the peak year of construction (2024), was provided by the Traffic and Transport team. This data was used to allow noise, and where relevant,</p>	No further action required

		<p>vibration levels to be predicted and assessed against the construction noise and vibration thresholds and magnitude criteria.</p> <p>Noise and vibration mitigation has considered embedded mitigation, e.g., site hoarding, and Best Practicable Means (BPM), e.g., non-vibratory compaction techniques. Examples of BPM are presented in the Construction Code of Practice (CCoP) and would be used to mitigate impacts as far as practicable. The assessment has proposed specific mitigation, including the use of temporary barriers when works are undertaken close to properties.</p> <p>Although increased noise levels are likely to occur during construction works, the effects are predicted to be below the significance thresholds used in the assessment.</p>	
BO RVBC 176	Theme – impact on safety of non-motorised users in Waddington	The RVBC Bowland February 2022 CTMP includes details of traffic management proposals on West Bradford Road at the north of Waddington. The proposals comprise a priority passing system, controlled through the implementation of 2 no. give ways, which would ensure the safe movement of vehicles through what is a narrow section of West Bradford Road. The proposals also provide sufficient refuge areas for pedestrians. In addition, no movement of HGVs would be permitted before 09:00 and between 14:45 and 16:00 to avoid busy times such as the school drop off and pick up.	No further action required
BO RVBC 177	Theme - Loss of Agricultural Land	Volume 2, Chapter 14 of the Proposed Bowland Section ES considers the impact of the Proposed Bowland Section in terms of severance of agricultural holdings. Whilst the vast majority of agricultural land impacted by the proposed development would be returned to its previous use following completion, United Utilities recognises that there would be disturbance over a number of years. United Utilities has been in discussions with landowners and tenants to ensure every effort is made to accommodate their requirements and, in the event planning permission is granted, would continue to do so throughout the pre-construction period.	No further action required

		Landowners affected by the proposed development would be compensated in accordance with Section 159 of the Water Industry Act.	
BO RVBC 178	Theme – Lack of consideration of suitable alternatives	<p>Volume 2, Chapter 3 of the Proposed Bowland Section ES and Appendix A of the Planning, Design and Access Statement describe the comprehensive options appraisal process undertaken to inform the selection of the preferred option.</p> <p>Further explanation regarding consideration of compound location is provided in Section 4 of the Main Supplementary Environmental Information (SEI) Report.</p>	No further action required
BO RVBC 179	Theme - Health and Wellbeing impacts	Volume 2, Chapter 14 of the Proposed Bowland Section ES considers the impact of the Proposed Bowland Section in terms of Health impacts and proposes measures to mitigate adverse effects.	No further action required