

Appendix A1: Summary of Consultation Responses to Planning Application (3/2021/0661)

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**Haweswater Aqueduct Resilience Programme - Proposed Marl Hill
Section**

Supplementary Environmental Information

**Appendix A1: Summary of Consultation Responses to Planning
Application (3/2021/0661)**

January 2022



Haweswater Aqueduct Resilience Programme - Proposed Marl Hill Section

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1. Summary of Consultation Responses to the Planning Application (3/2021/0661)

1.1 Introduction

- 1) This Addendum report provides a consultation response from United Utilities (UU) in respect of the comments received post submission to the Marl Hill planning application (ref: 3/2021/0661) 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 local authorities after the 9th December 2021 have not been considered within this addendum.

Resp No.	Consultation Response Text	United Utilities Response	Action
LANCASHIRE COUNTY COUNCIL HISTORIC ENVIRONMENT TEAM			
MH 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>	<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>Ribble Valley Borough Council to consider use of the recommended condition.</p>
NATURAL ENGLAND			
MH 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 Statements 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 Marl Hill Section against these requirements.</p> <p>Regarding the Braddup and Bonstone compounds, the locations are constrained by the need to connect onto the existing aqueduct. United Utilities has sought to make connections 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 compounds would be prominent features 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>	<p>Ribble Valley Borough Council to consider use of the recommended conditions.</p>

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	<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 Braddup and Bonstone compounds “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>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 Bowland Marl Hill 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 being imposed in respect of the Proposed Marl Hill Section 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</p>	

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	<p>We note that no mitigation is proposed for any of the compounds as they are considered to be 'temporary'.</p> <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>Chapter 19 of the Environmental Statements. Section 19.5.4 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</p>	

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	<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>conditions aligned to commencement of specific phases of construction</p>	
RIBBLE VALLEY BOROUGH COUNCIL – ENVIRONMENTAL HEALTH			
MH 03	<p>The air quality assessment concludes [in part]: Appropriate good practice dust mitigation measures would prevent significant effects occurring at offsite 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>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>

Resp No.	Consultation Response Text	United Utilities Response	Action
	<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>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.</p>		
GREATER MANCHESTER ECOLOGY UNIT			
MH 04	No comments have been received to date.	N/A	
RIBBLE VALLEY BOROUGH COUNCIL ARBORICULTURAL OFFICER			
MH 05	No comments have been received to date.	N/A	
LANCASTER CITY COUNCIL			
MH 06	<p>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.</p>	No response required	No further action required
CRAVEN DISTRICT COUNCIL			

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MH 07	No objection.	No response required.	No further action required
LANCASHIRE COUNTY COUNCIL (HIGHWAY AUTHORITY)			
MH 08	Consideration of additional measures (speed restrictions, road user compliance etc.) is required to provide a satisfactory proposal.	<p>A 30 mph speed limit would be implemented in the vicinity of the compound accesses from Slaidburn 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. 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 updated 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 updated 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 	Ongoing dialogue with the Highway Authority to be maintained following their review of the supplementary information submitted. Ribble Valley Borough Council to consider use of a condition requiring the implementation of the measures set out in the CTMP.

Resp No.	Consultation Response Text	United Utilities Response	Action
		<ul style="list-style-type: none"> • 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> <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. 	

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MH 09	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 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 has been used to determine the highway modification proposals.	
MH 10	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 offsite Highway Works drawings is acknowledged. The CTMP has been updated to provide detail relating to 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 updated CTMP.	
MH 11	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 CTMP has been updated to provide detail relating to 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 Braddup and Bonstone compounds and as a result, highway modifications and traffic management proposals solely relating to Haulage Route Option 1 have been removed from the proposed development.	
MH 12	The location of the passing places must account for driver visibility of oncoming vehicles and drivers' judgements of the need to use	See response to MH 08.	

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	the road widenings, in the placement of places. This information is currently not provided but required.		
MH 13	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 of the junction of the A59 and Pimlico Link Road, taking into account additional HGV movements associated with the proposed development, will be carried out and United Utilities commits to implementing the findings of the audit in accordance with a suitably worded planning condition.	
MH 14	Lack of modifications for the access route via Waddington centre	The CTMP has been updated to provide detail relating to 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 Braddup and Bonstone compounds 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 CTMP has been updated to account for this.	
MH 15	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 MH 14.	
MH 16	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 MH 14.	
MH 17	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	See response to MH 14.	

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	issues do not appear to be shown or highlighted in the proposals, nor any solution proposed.		
MH 18	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 Braddup and Bonstone compounds 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 updated CTMP.	
MH 19	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 MH 19. As set out above, the CTMP has been updated to provide detail relating to traffic management proposals on West Bradford Road at the north of Waddington.	
MH 20	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.	
MH 21	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 updated 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	

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		<p>requirement of a suitably worded planning condition, aligned to an agreed phasing plan.</p>	
MH 22	<p>On West Bradford Rd (at approx. 7690m chainage) the tracking shows that two low loaders cannot pass.</p>	<p>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.</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.</p> <p>The current proposals would not completely eliminate the possibility of verge overrun, but would help to reduce the risk, through:</p> <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. 	
MH 23	<p>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>	<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</p>	

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		<p>Almshouses. Further detail relating to these proposals is provided in the updated 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 (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. For this reason it is not considered necessary to implement parking restrictions within Chatburn.</p>	
MH 24	<p>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.</p>	<p>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 updated 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.</p>	
MH 25	<p>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.</p>	<p>Traffic signals are no longer proposed. The CTMP has been updated to this effect.</p>	
MH 26	<p>Various comments on Road Widening / passing place logic. Insufficient width for vehicles to pass in-between road widening.</p>	<p>See response to MH 08.</p>	

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MH 27	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.	
MH 28	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.	
MH 29	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.	
MH 30	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 Marl Hill and Bowland 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.	

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MH 31	Vehicle numbers to/from park and ride	Predicted vehicle numbers to and from the Citheroe Park and Ride have been extracted from the traffic model and have been provided to the Lancashire County Council Highway Officers for comment.	
MH 32	<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 proposal 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 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</p>	A 30 mph speed limit would be implemented in the vicinity of the compound accesses from Slaidburn 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 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 updated CTMP and signage urging other road users to take extra care when approaching the compound junctions would be erected.	

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	compliance at all times of the day/week, i.e. at times when no construction traffic will be utilising the route.		
MH 33	Lighting of junctions during periods of darkness (morning and evening only, not all night) should be considered.	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.	
MH 34	Requirement for wheel washing, road sweeping and gritting	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.	
MH 35	Bonstone compound. 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.	The compounds and accesses have been developed with highway safety in mind i.e. junction position, provision of remote compounds and provision of sufficient room to avoid vehicles waiting on highways. A road safety audit will be carried out and United Utilities commits to implementing the findings of the audit in accordance with a suitably worded planning condition. United	

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	(Note: there is an existing cattle grid immediately west of the B6478 on the proposed access, and there does not appear to be detail on how the cattle grid will operate during the HARP project.	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.	
MH 36	Bonstone compound junction from the B6478. This section of road will be reduced to 30 mph for the duration of the HARP project. Again, LCC Highways reiterate the need to ensure all vehicles comply with this reduced speed limit in the vicinity of the compound access	A 30 mph speed limit would be implemented in the vicinity of the Bonstone compound access with signage erected 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 CTMP. The speed of construction vehicles would be monitored in accordance with the measures outlined in the updated CTMP.	
MH 37	Braddup compound. 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 Braddup compound from Slaidburn Road would allow simultaneous two way movements. Formal passing bays are proposed along the length of the access track. A gatehouse is proposed, however this would be situated adjacent to the site compound a significant distance away from the access off Slaidburn Road. 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.	
MH 38	Braddup compound. The existing access should be closed during the works at the Braddup compound.	Noted. The existing access off Cross Lane would only be utilised by existing operational employees in light vehicles. No construction vehicles would be permitted to access the site from Cross Lane.	
MH 39	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 will commit 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	

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		agreed phasing plan to allow the sequencing of development with discharge of conditions aligned to commencement of specific phases of construction.	
MH 40	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 further information in response to comments made by the Highway Authority.	
MH 41	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 updated CTMP are based upon the latest predicted vehicle movements associated with the proposed works ("TVM - v6 - 30Jun20").	
MH 42	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 updated CTMP.	
MH 43	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 updated CTMP, as agreed with Lancashire County Council Highways.	
MH 44	The applicant must clarify whether tipper trucks will be stored on site, with provision shown for the vehicles. The movements as	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	

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	presented, do not appear to consider tipper trucks not being stored on site.	made for tipper trucks to be stored at the compound sites overnight and the updated CTMP includes plans showing sufficient space within the compound areas for tippers to be parked.	
MH 45	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.	
MH 46	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.	
MH 47	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 MH23, MH24 and the updated CTMP for further details of traffic management proposals on West Bradford Road as it approaches the centre of Waddington from the east.	
MH 48	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.	
MH 49	Provision for Equestrian, Pedestrian & Cycling, Public Rights of Way. All issues raised by LCC PRow to be addressed by the applicant.	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	

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		Waddington also incorporate sufficient refuge provision for pedestrians.	
MH 50	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 MH 21.	
MH 51	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.	
MH 52	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 Braddup and Bonstone compounds are presented in the updated CTMP. The sketches indicate that there is sufficient capacity to prevent delays or stacking at the accesses off Slaidburn Road.	
MH 53	Braddup and Bonstone compounds. 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	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 both the Braddup and Bonstone	

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	<p>provision for tipper truck and we would request clarity on whether tipper trucks are to be stored onsite overnight</p>	<p>compounds, 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 updated 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 made for tipper trucks to be stored at the compound sites overnight and the updated CTMP includes plans showing sufficient space within the compound areas for tippers to be parked.</p>	
MH 54	<p>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.</p>	<p>A draft Road Condition Monitoring and Maintenance Strategy has been provided (10/06/21) 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 Marl Hill Section and recognise the need for heads of terms to be agreed in advance of determination.</p>	
MH 55	<p>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.</p>	<p>The need for funding to ensure the Highway Authority is able to adequately execute its duties agreed under the Road Condition Monitoring and Maintenance Strategy is recognised and United Utilities is in dialogue with the Highway Authority regarding this.</p>	

LANCASHIRE COUNTY COUNCIL PUBLIC RIGHT OF WAY OFFICER

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MH 56	Formal comments from the Lancashire County Council Public Right of Way Officer in relation to the Proposed Marl Hill Section have not been received.	N/A	N/A
FOREST OF BOWLAND AONB (ECOLOGY)			
MH 57	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.
MH 58	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.	
MH 59	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.	<p>Bean Hill Woodland and Grassland (Road widening location RW02)</p> <p>Works at this location are no longer required and have been removed from the planning application.</p> <p>Waddington Fell and Browsholme Moor (Road widening location RW22)</p> <p>The footprint of the proposed works affecting this BHS are very small in what is a large designation. There is already evidence of damage to the road verge. The selection of highway modification works within this designation have been dictated by highway safety considerations and Lancashire Wildlife Trust has been</p>	

Resp No.	Consultation Response Text	United Utilities Response	Action
		<p>consulted on potential issues and the proposed approach to mitigation.</p> <p>Bradford Fell, Easington Fell and Harrop Fell (Road widening location RW23)</p> <p>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 and Lancashire Wildlife Trust has been consulted on potential issues and the proposed approach to mitigation.</p> <p>Waddington Fell Road, Roadside Verges BHS</p> <p>The proposed highway modification works would impact on about a quarter of the BHS. This has been discussed with Lancashire Wildlife Trust and no concerns were raised, subject to satisfactory reinstatement.</p>	
MH 60	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 Braddup and Bonstone compounds 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.	
MH 61	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.	

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MH 62	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.	
MH 63	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.	
MH 64	Comments relating to the submitted Biodiversity Net Gain Assessment	<p>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:</p> <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 • 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. 	

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MH 65	Concerns over very high distinctiveness (VHD) habitats and veteran trees	<p>High distinctiveness habitats have been compensated for on a 4:1 ratio.</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.</p>	
MH 66	Does BNG assume worst case?	<p>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 will be possible to further avoid and mitigate impacts through detailed design.</p>	
MH 67	Inadequate assessment of the likely ecological impacts of the proposed highway works and Ribble crossing/haul road and the necessary avoidance, mitigation and compensation measures.	<p>Additional technical reports are provided as part of the SEI:</p> <ul style="list-style-type: none"> • Ecology data summary tables. bat trees, hedgerows and target notes (all were used to inform the June 2021 assessment) • GWDTE assessment for highway modification works • Breeding bird surveys have been completed for the Ribble crossing. <p>Likely ecological impacts have been fully considered including fragmentation and disturbance. No lighting is proposed during the operation of the temporary haul road, no night time traffic movements will occur other than potentially required for a staff shift change. There will be no new kerbs on road widenings and no solid boundaries to haul roads. Field boundary crossings relating to the Ribble crossing are through existing gaps in generally gappy linear features.</p>	

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		<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>	
MH 68	<p>Compensation proposals and biodiversity net gain calculations don't take into account the full impacts of the proposed highway works.</p>	<p>A BNG Assessment covering the proposed off-site highway modifications is submitted as part of the SEI.</p>	
MH 69	<p>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.</p>	<p>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</p>	

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		discharge of conditions aligned to commencement of specific phases of construction.	
MH 70	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>	
MH 71	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 will 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>	

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MH 72	<p>Incomplete Protected Species Presence/Absence surveys (Badgers, Barn Owl, Toads)</p>	<p><u>Badgers (road kill 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 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 (road kill 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 considered and scoped out.</p>	
MH 73	<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</p>	

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	<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</p>	<p>connectivity in the absence of mitigation. No licensable activities were identified associated with the road widening areas R22 or 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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	<p>sedimentation could also have significant effects on otter, for example, by affecting the availability of prey species.</p>		
MH 74	<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</p>	

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		voles in areas where direct impacts to these habitats could occur and hence did not require further surveys.	
MH 75	<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, 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>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 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>	

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MH 76	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>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 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. • 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 	
MH 77	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.	
MH 78	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.	

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MH 79	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.	
MH 80	Inconclusive offsite Great Crested Newt (GCN) eDNA result	<p>A significant survey was undertaken with no GCN confirmed within the zone of influence of any works proposed as part of the Proposed Marl Hill Section.</p> <p>No ponds would be lost as a result of the proposed development.</p> <p>Surveys will be repeated in the season preceding the commencement of the development to re-confirm absence. In the highly unlikely event GCN are confirmed present, a district licensing approach would be adopted.</p>	
MH 81	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 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>	
MH 82	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>	
MH 83	Recommendation of various conditions	United Utilities would support the use of the recommended condition which would be discharged when the contractor has	

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		<p>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>	
FOREST OF BOWLAND AONB (LANDSCAPE)			
MH 84	<p>Formal comments from the Forest of Bowland AONB Landscape Advisor have not been received.</p>	<p>Discussions with the Forest of Bowland AONB Landscape Advisor are ongoing. Supplementary information contained in the SEI report and supporting appendices will be made available for review and we will endeavour to address any further comments as they arise.</p>	
WEST BRADFORD PARISH COUNCIL			
MH 85	<p>Members of West Bradford Parish Council wish to express their support, in the strongest possible terms, for Haulage Route Option 2. Their reasons for giving such unequivocal support are articulated below:</p> <p>I. the creation of a temporary river crossing would mitigate the otherwise considerable impact of heavy goods vehicles passing directly through the village. It has proved difficult for members to locate, within the vast range of documentation submitted as part of the planning application, details of the number of additional vehicle movements anticipated through West Bradford in the event that Haulage Route Option 1 is adopted. However, in March 2021 UU confirmed to West Bradford Parish Council that the number of additional vehicle movements will be in the region of 160 per week at peak operational time. This figure is made up of 4 vehicle movements per hour, over an 8-hour day (excluding school times), for 5 days per week. Bearing in mind the size of the AIL vehicles concerned (the term "AIL" encompasses mobile cranes and boring machinery), and the unsuitability of the rural</p>	<p>Planning application 3/2021/0661 included two options for the routing of construction traffic to the proposed Braddup and Bonstone compounds. 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</p>	<p>No further action required</p>

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	<p>road network, members believe this burden on village life to be unacceptable when a viable alternative – ie Haulage Route Option 2 - is available;</p> <p>II. Members would wish to expand upon the comment above regarding the unsuitability of the existing road network through the village of West Bradford. Specifically, the sharp and steep bend to the west of the 3 Millstones on Waddington Road is difficult for normal traffic, let alone AILs. Even if traffic control measures are deployed at this “pinch point”, as UU suggest, members are concerned that traffic flow will be severely disrupted. Many local residents have children attending Waddington and West Bradford primary school, and this section of Waddington Road leads directly to the school itself. Traffic flow past the school is already congested at peak times (ie the beginning and end of the school day) and it is inconceivable that AILs could safely negotiate this route without putting schoolchildren at risk. UU suggests that inconvenience to parents and risk to schoolchildren could be minimised by imposing a condition on the planning consent to prohibit AILs from passing the school at key times; see paragraph 122 of the Planning, Design and Access Statement.</p> <p>However, members are sceptical that such a condition would be adhered to or sufficiently enforced (given the scarce officer resources available to it) by the Borough Council as Local Planning Authority (LPA). If approved, Haulage Option Route 1 would carry significant road safety risks and in effect would amount to “an accident waiting to happen”. In contrast, Haulage Route Option 2 would divert all AILs and other site traffic over the temporary river crossing and safely past the school, as well avoiding other traffic pinch points en route;</p> <p>III. the otherwise negative impact on residential amenity caused by noise / vibration from AILs passing directly through the village</p>	<p>3/2021/0661, confirming that the Ribble Crossing would be implemented and used to facilitate the construction of the Proposed Marl Hill 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 Newton-in-Bowland compound in connection with the Proposed Bowland Section (3/2021/0660). 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 proposed as part of planning application 3/2021/0660, 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> <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>	

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	<p>would be greatly reduced. In particular, members note the comment in paragraph 249 of the Planning, Design and Access Statement – under Haulage Route Option 2 “Construction road traffic is not anticipated to result in significant effects during the operation of the Proposed Ribble Crossing”; and</p> <p>IV. whilst clearly the capital cost of constructing a temporary river crossing would be considerable, this would at least be partially offset by removal of the need to carry out alterations to the highway / existing Ribble crossings in the undesirable event that Haulage Route Option 1 is preferred. Similarly, members are conscious that passage through the village of up to 160 AILs per week would have a detrimental effect on the recently resurfaced Grindleton Road. Members are grateful to UU for verbally Confirming on 24 March 2021 that any highway defects caused by this traffic would be remedied (which again should be enshrined in a planning condition), although again any such cost would be saved if Haulage Route Option 2 is chosen.</p>	<p>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 Marl Hill Section and recognise the need for heads of terms to be agreed in advance of determination.</p>	
MH 86	<p><u>Clitheroe Park and Ride / HGV Holding Area</u></p> <p>Members would support the establishment of both such sites in conjunction with the adoption of Haulage Route Option 2, on the grounds that they would (i) allow AIL journeys over the temporary river crossing to be managed / scheduled – this would hopefully further reduce concerns in relation to Waddington and West Bradford primary school; and (ii) that overall vehicle journeys would be reduced if site staff are taken collectively to their workplace on buses.</p>	<p>The Clitheroe Park and Ride and HGV Holding Area remain key to the operation of Haulage Route Option 2 (the Ribble Crossing). The Clitheroe Park and Ride would allow the number of light vehicles using the haulage route to be limited as far as possible and the HGV Holding Area would allow for the marshalling of larger vehicles outside of restricted hours (i.e. school drop off and pick up times) and to prevent such vehicles passing along the route.</p>	No further action required.
MH 87	<p>The Parish Council is aware that land to the north west of Bradford Bridge is well-used by local dogwalkers and ramblers. Once again, during previous dialogue with UU, assurances have been given that safe public access across land affected by the development will be</p>	<p>Continued access along Public Rights of Way crossed by the Ribble Crossing would be maintained through a combination of managed crossing points and short diversions, as set out in Volume 6 Chapter 13 of the ES. Final details would be submitted as part of</p>	Final details to be submitted as part of an application for temporary public

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	<p>preserved. Again, the Parish Council would ask that this is mandated by LPA through planning conditions. As an aside, members have observed that – during the pandemic – local PRowers have been increasingly used by non-residents of the village, who have parked on West Bradford Road to the south of Bradford Bridge. Should planning approval be granted, UU may wish to bear this in mind when developing their plans for implementation of Haulage Route Option 2.</p>	<p>an application for temporary public right diversions in advance of construction.</p>	<p>right diversions in advance of construction.</p>
<p>MH 88</p>	<p><u>Impact on farming community</u></p> <p>The Parish Council supports Haulage Route Option 2 on the grounds that it will cause minimum disruption to the majority of local residents. However, members are conscious that farmers play a significant role in the local economy and would wish to ensure that any landowner affected by the temporary river crossing is appropriately compensated by UU.</p> <p>In dialogue with members, UU has also confirmed that – on conclusion of the project – any land affected by the development activity will be restored to its original condition. The Parish Council would ask that the LPA mandate this obligation through a planning condition.</p>	<p>United Utilities remain in close dialogue with landowners and tenants affected by the proposals and will ensure their accommodation needs are met and that they are adequately compensated for disruption to farming operations.</p> <p>United Utilities can confirm that, on completion of the proposed development, the Ribble Crossing would be reinstated in its entirety in keeping with pre-entry conditions.</p>	<p>United Utilities will remain in close dialogue with landowners and agricultural tenants.</p>
<p>MH 89</p>	<p><u>Statement of Community Involvement</u></p> <p>During the various consultation exercises hosted by UU, members of West Bradford Parish Council were keen to understand the extent to which UU would be willing to compensate local residents for any loss, inconvenience or damage suffered through no fault of their own at the hands of the developer. UU did not go into any detail about their willingness to support residents in this way moving forward, but did not rule this out.</p>	<p>Haulage Route Option 1 is no longer proposed to be implemented, except for a period of approximately 9 months during the enabling works phase to facilitate the construction of the Ribble and Hodder Crossings (part of the Proposed Bowland Section - 3/2021/0660). There would only be a very infrequent requirement for HGVs to travel through Chatburn, Grindleton and West Bradford during this period, as set out in the updated CTMP. On this basis, it is considered unlikely that such HGV movements</p>	<p>United Utilities will remain in close dialogue with the Parish Council.</p>

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	<p>It is disappointing to see that, although a Statement of Community Involvement (SCI) is attached to the planning application, this document describes in great detail the consultation methodology undertaken but does little to address residents' wider concerns. At page 44 comes the bland comment:</p> <p>"We will look for opportunities to engage with and invest in the communities we are working within during the delivery of the programme of work. Our dedicated customer liaison team will be working closely with those communities to identify opportunities that meet local needs."</p> <p>The SCI goes on to refer to structural impact arising from vibration due to tunnel boring, and gives a commitment to "rectify the problem" in such instances. However, no mention is made of the impact which vibration arising from the movement of heavy goods vehicles passing through West Bradford village under Haulage Route Option 1 may have on local properties. Vibration damage is equally unacceptable whether arising from tunnel boring or heavy vehicle movement. Will a similar commitment be given to the residents of West Bradford who may be impacted in this way?</p> <p>In members' view, UU' has failed to provide a positive Community Impact Statement addressing the need for a local compensation scheme should the impact of increased traffic flow on the village become disproportionate.</p>	<p>would impact on structures through West Bradford village as a result of vibration.</p> <p>The commitment included on page 44 of the Statement of Community Involvement remains valid. United Utilities is not in a position to provide further details on community investment proposals at this stage. In the event planning permission is granted, our intention would be to work with local communities to identify suitable opportunities tailored to local needs.</p>	
MH 90	<p><u>Local employment</u></p> <p>The Parish Council has sought guarantees from UU that, wherever possible, local contractors should be used on the HARP project in order to ensure that any financial benefit arising from the development is spread as widely as possible. No such assurances have yet been given, but members would ask that the LPA</p>	<p>In the event planning permission is granted, United Utilities will work closely with the appointed contractor to ensure the employment of local people in the delivery of the proposed development wherever possible.</p>	<p>No further action required.</p>

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	consider whether this is an appropriate approach matter which they would encourage UU to pursue		
LEAD LOCAL FLOOD AUTHORITY (LANCASHIRE COUNTY COUNCIL)			
MH 91	<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: Volume 6 Proposed Ribble Crossing Appendix 8.1: Flood Risk Assessment, Reference: RVBC-MH-RC-TA-008-001 Rev:0, Dated: June 2021, Prepared by: Jacobs. 2. Document name: Volume 6 Proposed Ribble Crossing Chapter 8: Flood Risk, Reference: RVBC-MH-RC-ES-008, Rev: 0, Dated: June 2021, Prepared by: Jacobs. 3. Document name: Proposed Marl Hill Section Environmental Statement Volume 2 Chapter 8: Flood Risk, Reference: RVBC-MH-ES-008, Rev: 0, Dated: June 2021, Prepared by: Jacobs. 4. Document name: Proposed Marl Hill Section Environmental Statement Volume 4 Appendix 8.1: Flood Risk Assessment, Reference: RVBC-MH-TA-008-001, Rev: 0, Dated: June 2021, Prepared by: Jacobs. 	<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 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>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>		

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	<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> <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 Volume 6 Proposed Ribble Crossing Appendix 8.1: Flood Risk Assessment, Volume 6 Proposed Ribble Crossing Chapter 8: Flood Risk, Proposed Marl Hill Section Environmental Statement Volume 2 Chapter 8: Flood Risk, Proposed Marl Hill Section Environmental Statement Volume 4 Appendix 8.1: Flood Risk Assessment.</p>		

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	<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> <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>		

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	<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>		
HEALTH AND SAFETY EXECUTIVE			
MH 92	<p>HSE does not advise, on safety grounds, against the granting of planning permission in this case.</p> <p>As the proposed development is within the Consultation Distance of a major hazard pipeline you should consider contacting the pipeline operator before deciding the case. There are two particular reasons for this:</p>	<p>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.</p>	<p>United Utilities to remain in close dialogue with SABIC UK.</p>

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	<ul style="list-style-type: none"> The operator may have a legal interest (easement, wayleave etc.) in the vicinity of the pipeline. This may restrict certain developments within a certain proximity of the pipeline. The standards to which the pipeline is designed and operated may restrict occupied buildings or major traffic routes within a certain proximity of the pipeline. Consequently there may be a need for the operator to modify the pipeline, or its operation, if the development proceeds. <p>HSE's advice is based on the situation as currently exists, our advice in this case will not be altered by the outcome of any consultation you may have with the pipeline operator.</p>		
OFFICE FOR NUCLEAR REGULATION			
MH 93	With regard to planning application 3/2021/0661, ONR makes no comment on this proposed development as it does not meet ONR's consultation criteria	No further action required.	
SABIC UK PETROCHEMICALS LIMITED			
MH 94	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			
MH 95	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.	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	United Utilities to remain in close dialogue with Ribble Fisheries

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	<p>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.</p> <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>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 will use the baseline data to inform the definition of water quality parameters which activities on site will 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 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>Consultative Association</p>
RIBBLE RIVERS TRUST			
MH 96	<p>Commissioning phases to have "Temporary" affects on the aquatic environment which on decommissioning will recover and as such do not require any mitigation as they are not considered material. However, many of the locations relating to some of these things, are in extremely perilous state, and significant work is being done to aid in a recovery. Small impacts even of a temporary nature could be very significant in terms of impact. This includes for protected species such as the White Clawed Crayfish.</p> <p>Furthermore the baseline assessment appear to have taken EA data which is not always appropriate for some of these sites, in</p>	<p>United Utilities has been in dialogue with Ribble Rivers Trust 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 will use the baseline data to inform the definition of water quality parameters which activities on site will be monitored against.</p>	<p>Ribble Valley Borough Council to consider use of a planning obligation requiring the implementation of the BNG offsetting strategy.</p>

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	<p>terms of specific locations and data type. But there is so much information to work through.</p> <p>I think our overall our current position is that we object, unless certain conditions to be imposed to ensure that our concerns are appropriately addressed. As insufficient information has been provided, insufficient consideration or a lack of understanding of sites and potential impact of the works has occurred, and insufficient mitigation and certainty around delivery of mitigation has been proposed.</p> <p>Such as:</p> <ul style="list-style-type: none"> • a condition requiring certain detail to be provided around long term management of the Biodiversity mitigation sites • Basline invertebrate monitoring is undertaken, and/or provided • an independent ongoing monitoring programme for water quality and aquatic ecology is included through both the commissioning and operation period that is transparent and available publicly/to key stakeholders • Further mitigation is agreed for impacts to the aquatic environment that existing BNG tools/metrics didn't cover at the time of application and/or impacts are underestimated. 	<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 in writing by the Local Planning Authority, following consultation with relevant regulatory bodies and key stakeholders, will be the subject of suitably worded conditions. 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>The submitted Biodiversity Net Gain (BNG) assessment has been updated and is submitted as part of the SEI. In summary:</p> <ul style="list-style-type: none"> • BNG assessment has been converted into Metric 3.0 • The Rivers Metric has been completed • The highways BNG assesment has been added • The off-setting proposals have been updated • 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 Ribble Rivers Trust for review if desired. <p>It is anticipated that the implementation of the BNG offsetting strategy would be an obligation of a Section 106 legal agreement.</p>	
GRINDLETON PARISH COUNCIL			

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MH 97	<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 3/2021/0661 included two options for the routing of construction traffic to the proposed Braddup and Bonstone compounds. 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 3/2021/0661, confirming that the Ribble Crossing would be implemented and used to facilitate the construction of the Proposed Marl Hill 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 Newton-in-Bowland compound in connection with the Proposed Bowland Section (3/2021/0660). 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 proposed as part of planning application 3/2021/0660, United Utilities is seeking flexibility to use Route Option 1 during the enabling works phase; a period lasting no</p>	No further action required.

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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 strenuous 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> <ul style="list-style-type: none"> -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. -it will be difficult to work around the school buses as they have a very varied routine. -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>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> <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</p>	

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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>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, 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</p>	

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	<p>There is concern that possible damage to houses and roads (including culverts) along this route has not been addressed.</p> <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>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 increased 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 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>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>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</p>		

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	<p>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 & 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</p>		

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	<p>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> <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 PARISH COUNCIL			

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MH 98	<p>The above parish council would like to comment that it would be helpful if all other roads in the vicinity ie 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			
MH 99	<p>Theme – Preference for Haulage Route Option 2 (the Ribble Crossing) vs Haulage Route Option 1 due to concerns around:</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 along the roads around Chatburn due to congestion and parking restrictions; -noise and air quality impacts associated with routeing 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; 	<p>Planning application 3/2021/0661 included two options for the routeing of construction traffic to the proposed Braddup and Bonstone compounds. 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 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 3/2021/0661, confirming that the Ribble Crossing would be implemented and used to facilitate the construction of the Proposed Marl Hill Section.</p> <p>The construction of the Ribble crossing is anticipated to take approximately 9 months in total and would also be required for</p>	<p>No further action required.</p>

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	<ul style="list-style-type: none"> -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; -there is a weight limit restricting movement of HGVs through Chatburn. Lifting the restriction could lead to additional traffic travelling through the village; -impact on Chatburn Conservation Area; -impact of vibration on structure of buildings along the route; -impact on nature reserve alongside Crow Trees Brow; -impact on viability of shops and businesses in Chatburn; -homeowners situated along the route will suffer housing blight; -impact on road between West Bradford and Grindleton -impact on non-motorised users, particularly vulnerable groups (e.g. young, elderly and disabled) 	<p>access to the proposed Newton-in-Bowland compound in connection with the Proposed Bowland Section (3/2021/0660). 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 proposed as part of Planning application 3/2021/0660, 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> <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>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 Marl Hill</p>	

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	<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>-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>	<p>Section and recognise the need for heads of terms to be agreed in advance of determination.</p>	
MH 100	<p>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 river bank.</p>	<p>Highway modifications RW03 and RW04 are no longer proposed.</p>	<p>No further action required.</p>
MH 101	<p>Theme – Haulage Route Option 2 (the Ribble Crossing) should be extended to bypass Waddington</p>	<p>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</p>	<p>No further action required.</p>

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		<p>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 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 updated CTMP.</p>	
MH 102	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 Bowland Marl Hill 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 	No further action required.

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		<p>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 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. 	
MH 103	Theme – impact on highway safety (Slaidburn Road)	See response to MH 08.	No further action required.
MH 104	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.
MH 105	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	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	No further action required.

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	highway safety issues. The proposed works would cause further issues and impact on the health and wellbeing of villagers	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 updated CTMP.	
MH 106	Theme – impact on safety of non-motorised users in Waddington and travelling between Waddington and West Bradford.	See response to MH 49.	No further action required.
MH 107	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 updated CTMP.	No further action required.
MH 108	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.
MH 109	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 Marl Hill Section 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,</p>	No further action required.

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		<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>	
MH 110	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 Marl Hill 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.

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MH 111	Theme – impact on Forest of Bowland AONB	See response to MH 02.	No further action required.
MH 112	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 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 commencement of construction activities to consider the most up-to-date school schedules.	No further action required.
MH 113	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 Marl Hill Section.	No further action required.
MH 114	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 Marl Hill 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	No further action required.

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		<p>alternative to traffic signals. Through ongoing consultation with local people, local councils and highways authorities, United Utilities will 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 experience a disturbance effect that is significant in the context of the EIA Regulations.</p> <p>United Utilities will 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>	
MH 115	Theme – less invasive and damaging alternatives to the scheme should have been considered	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 Marl Hill 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	No further action required.

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		<p>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>	
MH 116	<p>Theme – Impact on safety of other road users, including non-construction related traffic and non-motorised users (pedestrians, cyclists, equestrians)</p>	<p>The updated 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 safety of other road users during the implementation of the Proposed Marl Hill Section.</p> <p>Control of access to the proposed Braddup and Bonstone compounds, which are both in excess of 500m from the proposed junctions off Slaidburn Road, 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</p>	<p>No further action required.</p>

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		<p>construction vehicles would be monitored in accordance with the measures outlined in the updated 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 updated CTMP, a programme of HGV driver training would be implemented. The programme will 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 will 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 will be required to present a valid DQC to security when delivering to any site. The Contractor's methods for undertaking HGV driver training will also include the following:</p>	

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		<ul style="list-style-type: none"> • All HGV and PCV drivers will have to complete the contractor’s HGV Driver Induction that will include explicit guidance upon the safe use of the proposed routes • The proposed information pack (Section 6.3 above) will include a personal guidance document (a “HGV Driver’s Handbook”) the induction procedure will include clear guidance upon what is included in the pack • All HGV drivers will have to attend a mandatory prestart briefing such as a Tool Box Talk. The purpose of which will be to communicate a sense of responsibility, encouraging higher driving standards by explaining the importance of compliance. The Tool Box Talk will also provide drivers with information about key hotspot areas for non-motorised users along the routes • At the end of each Tool Box Talk, a declaration will have to be signed by each driver in attendance and retained by the Contractor • Frequent HGV drivers working on the project will 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 will be refused entry to all construction sites until they have complied with the minimum requirements • The Contractor will 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 will be subject to project disciplinary procedures. This process will be made clear to all at project induction. 	

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MH 117	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 updated CTMP.	No further action required.
MH 118	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 updated 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 respond to any issues of this nature raised by members of the local community.	No further action required.
MH 120	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 	No further action required.

Resp No.	Consultation Response Text	United Utilities Response	Action
		<ul style="list-style-type: none"> 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 	
MH 121	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.
MH 122	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 updated CTMP. United Utilities acknowledge that an appropriate 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.	No further action required.
MH 123	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.
MH 124	Theme – impact on the setting of Waddington and surrounding villages	It is acknowledged in Volume 2 Chapter 10 of the Proposed Marl Hill 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	No further action required.

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		<p>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 updated 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, which would further reduce visual effects on the setting of the Conservation Area. Notwithstanding this there remains a predicted adverse effect, which is concluded as being significant in Chapter 10.</p>	
MH 124	<p>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.</p>	<p>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 updated CTMP.</p> <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>	No further action required

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MH 125	<p>Theme - The increased noise and pollution between 7am and 8am prior to restriction of movements during morning peak period.</p> <p>Why have United Utilities neglected to consider/rejected the idea of extending the Bonstone/Braddup compounds or widening the existing access road to the Braddup compound from Cross Lane and using that to park vehicles overnight, meaning that the workforce could be bused in each day dramatically reducing vehicle numbers and thereby pollution and noise for both those time periods.</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 made for tipper trucks to be stored at the compound sites overnight and the updated CTMP includes plans showing sufficient space within the compound areas for tippers to be parked.</p> <p>Vehicle movements to and from the proposed Braddup and Bonstone compounds before 09:00 would be limited to light vehicles. Light vehicles would require access to the sites between the hours of 06:45 and 08:00 to facilitate shift changeovers. The number of vehicles requiring access to the sites during this period would be reduced as far as possible through the use of the Clitheroe Park and Ride. Construction personnel would arrive at the Park and Ride in their personal vehicles before being shuttled to site via minibus.</p>	No further action required
MH 126	<p>Surface water regularly runs down Slaidburn Road during periods of heavy rainfall. I see no analysis of how the proposed road widenings will affect these periodic streams (which currently miraculously avoid properties adjacent to the road). Altering their flow patterns may well cause property damage, either to buildings or land along Slaidburn Road and indeed in Waddington village itself</p>	<p>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.</p>	No further action required
MH 127	<p>Damage to the road surface that is bound to be caused by the increase in heavy vehicles. Slaidburn Road does not have the best surface as it is and there is bound to be a large increase in vehicles damaged by pot-holes over the six year construction period. I note that United Utilities claim that the road will be put back to existing conditions after work is finished. However there should surely be a</p>	<p>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</p>	No further action required

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	burden of maintenance placed upon United Utilities for the whole six year period	network throughout the construction of the Proposed Marl Hill Section.	
MH 128	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. United Utilities will 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. It is anticipated that the Local Planning Authority will 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.	No further action required
MH 129	Theme – traffic estimates taken during lockdown. When will there be a post-lockdown traffic impact assessment?	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
MH 130	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.	No further action required