

Nicola Hopkins  
planning@ribblevalley.gov.uk  
Council Offices  
Church Walk  
Clitheroe  
Lancashire  
BB7 2RA

Cc:

Couns Brown, Austin, French & Brown

**RE: United Utilities HARP Planning Application Application 3/2021/0119**

Dear Ms Hopkins,

We have been involved in an engagement process with United Utilities as part of the wider HARP Consultation process over the last two years.

After several meetings between local angling clubs and UU, we feel we have exhausted all channels of constructive dialogue and we would like to emphasise our strenuous opposition to UU's planning application.

We note that UU has amended the original application to prioritise the haul road and river crossing at West Bradford.

**This solution is entirely unacceptable to RAA. The environmental risks posed by the run-off from the associated haul roads across what is essentially a flood plain risk profound and long-lasting damage to the fishery – and to the wider wildlife and biodiversity of this ecosystem.**

As the much-delayed Environmental Impact Assessment (EIA) produced by the Environment Agency clearly indicates – some elements of this project risk a profound environmental impact on the riparian wildlife of the Ribble unless the environmental management of the project is overseen by a consortium of stakeholders to include riparian owners, fishing clubs conservation and environmental organisations.

United Utilities has a well-documented track record of delays to largescale engineering schemes of this nature and failing to make good on assurances given to stakeholders to obtain planning permission.

Article from the *Financial Times*, February 14, 2021:

<https://www.ft.com/content/43eb5f5d-e61c-4e8a-a7f5-e9568322f2ad>

Article from Carlisle News and Star

<https://www.newsandstar.co.uk/news/18715576.farmers-take-united-utilities-land-left-mess/>

## Farmers take on United Utilities after land is left in a mess

12th September 2020

BY SAM SMEDLEY  
REPORTER

Share     1



Time: "The final reinstatement will be completed to a high standard."

**The farming community is up in arms and feeling United Utilities have left their land a 'complete shambles' as a result of the work to complete the new water supply to West Cumbria.**

The water company insists it has not finished the project and will work closely with the farming community during the reinstatement of land.

A recent survey has uncovered a long list of complaints over poor work, years of delay and dysfunctional communication.

Since 2017 the £300 million project to create a new water supply for West Cumbria drawing on the reservoir at Thirlmere. This has led to large areas of Lakeland farmland being fenced off for deep excavations.

Now farmers and landowners have joined together to protest about the problems they have suffered during the works.

Val Edmondson, who farms land near Millbeck, said: "We were promised the earth at the initial consultation meetings. United Utilities have simply not

We have sought expert advice from a number of environmental and scientific experts on what a robust pollution monitoring and alert scheme would look like, and we would request that – as a minimum – stringent environmental management criteria are applied to any consents granted.

We would also request that substantial penalties and consequences for UU or its contractors failing to effectively manage or mitigate sediment pollution from the haul roads are agreed and set out in advance of any planning permission being granted.

**For this reason, it would be entirely inappropriate for the planning authority to delegate approval powers to planning officers as this may prevent ongoing scrutiny of mitigation plans as the project evolves over its six to eight-year duration.**

As the 2020 Fisheries Monitoring report by the Ribble Rivers Trust makes clear, from an environmental perspective, the Ribble is in a precarious state and any increase in the volume of diffuse pollution has the potential to have a catastrophic impact on wildlife.

Projects of the scale and duration of the HARP project will impact the whole spectrum of riparian life on the Ribble and Hodder, affecting not only the globally endangered Atlantic salmon, but also aquatic fly life, birdlife and otters.

The Ribble is now one of only a handful of rivers across England with a viable migratory salmon run – thanks in part to the efforts of local anglers, who voluntarily return more than 90 per cent of migratory salmonids caught on the river.

With an anticipated duration of six to eight years (although see observations above about delays), unless diffuse pollution and sediment run-off are effectively monitored, managed and mitigated, **this project has the potential to bring the Atlantic salmon to the point of extinction in the Ribble catchment.**

Ribblesdale Angling Association will ensure that environmental organisations across the UK and further afield are aware of the very real threat this application poses to the future of the Atlantic Salmon in England.

As owners of riparian rights on the sections of the Ribble directly impacted by the HARP project, we have also shared our concerns with other riparian owners across the catchment and made them aware of the potentially catastrophic impact on the value of their assets in the event that the salmon becomes extinct on the Ribble.

We are also very committed to holding United Utilities and any other agencies and organisations to account in the event that the environmental management of this project falls short of the criteria identified in the Environment Agency's Environmental Impact Assessment.

Yours sincerely

**Mark Sutcliffe**

HARP oversight and liaison

Ribblesdale Angling Association