

Nicola Gunn

From: Planning
Subject: FW: REDACT AND UPLOAD Comments on Planning Application 3/2021/0661

From: Jack Spees <jack@ribbletrust.com>
Sent: 23 July 2021 16:11
To: John Macholc <John.Macholc@ribblevalley.gov.uk>
Cc: HARP Stakeholder Relations <HARPStakeholderRelations@uuplc.co.uk>
Subject: Comments on Planning Application 3/2021/0661

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Dear John,

I have been working my way through the various documents relating to the above application, and owing to the volume I am concerned that there is insufficient time. I have identified a number of significant areas of concern. Such as where commissioning phases 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. Furthermore the baseline assessment appear to have taken EA data which is not always appropriate for some of these sites, in terms of specific locations and data type. But there is so much information to work through.

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.

Such as:

- 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.

We have been in direct dialogue with the applicant, who is aiming to hold a workshop with a number of Aquatic Environment Stakeholder in the near future, at which some of these concerns will be discussed. And perhaps they will be ameliorated there and we can change our position. Chris from the HARP team has said that you would be willing to consider comments post the deadline owing to the timescales of the workshop and the deadline?

Many Thanks

Jack Spees

Chief Executive

Ribble Rivers Trust

Please note I am now home working.

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