

[REDACTED]

Our Ref: [REDACTED]

Date: 27th April 2022

John Macholc
planning@ribblevalley.gov.uk
Council Offices
Church Walk
Clitheroe
Lancashire
BB7 2RA

[REDACTED]

Cc:
[REDACTED]

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

Dear Sir,

Further to my letter dated 24th June 2021 we have been involved in an engagement process with United Utilities as part of the wider HARP Consultation process over the last 18 months.

After several meetings between ourselves, who are representing the interests of our membership which consists of local angling clubs, owners, lessees of fishing and anglers, 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 for the following reasons.

- We have been requesting sight of the Environmental Impact Assessments for these applications since December 2020. To date, these have not been forthcoming, and we understand that this is because the Environment Agency shares our concerns
- We also requested to see tangible evidence of robust mitigation schemes to manage and contain diffuse pollution – particularly associated with the temporary bridges and haul roads at Newton and West Bradford. To date, this has STILL not been forthcoming from UU.

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 [REDACTED]. 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.



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/>

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

12th September 2021

BY SAM SMEDLEY
12th September 2021

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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 Thirimer. 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, which is attached to this submission.



In our view, any future EIA produced by UU must contain a monitoring and alert system which is at least as robust as the system outlined below.

Furthermore, before any work commences on the HARP project, this pollution monitoring system must be installed and operating for at least 12 months in order to provide a rigorous set of baseline data.

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 6-8 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.

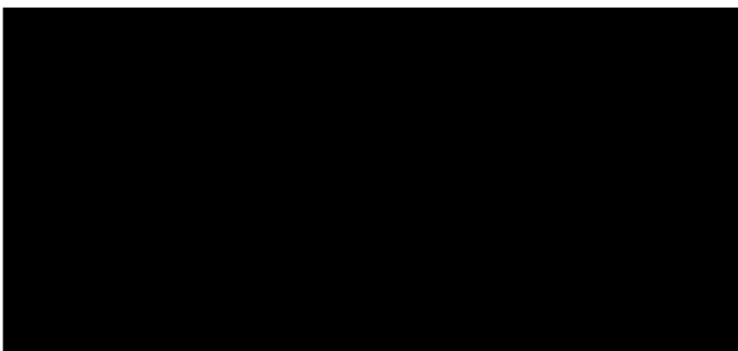
The Ribble is now one of only a handful of rivers across England with a viable migratory salmon run – thanks in part to the efforts of local anglers, who voluntarily return more than 90 per cent of migratory salmonids caught on the river.

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.**



we 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.

We are also very committed to holding United Utilities and any other agencies and organisations to account in the event that this ill-conceived and wholly unacceptable application is granted planning permission.





Document	HARP - River Ribble and Hodder Water Quality Monitoring
Customer	[Redacted]
Date	22-06-21

The [Redacted] as requested by HARP/UU to produce a monitoring framework to oversee the forthcoming project at West Bradford, Clitheroe. Additionally, the Hodder Consultative have previously presented their proposal to HARP/UU.

As with the Hodder Consultative we agree that it imperative that benchmark is established and refer to the historical references detailed within their submission.

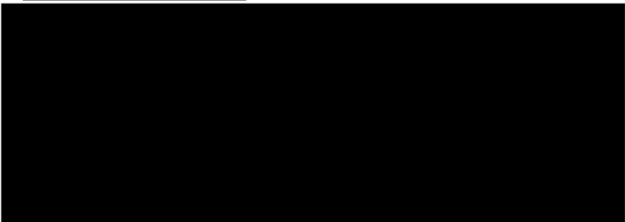
The [Redacted] would expect as a minimum that HARP/UU undertake a commitment to provide a comprehensive monitoring program which would commence between two and one year prior to any works being commenced and would run for at least one year post work.

The Key Elements would include but not limited to:

1. **Ecology surveys** – Long term tracking of ecology trends on the river
2. **Spot Sampling** - For identifying long term trends and detect elements such as heavy metals.
3. **Real-Time Monitoring** – To identify events and short-terms changes in the river, also to trigger sample collection or further analysis

We feel that the Hodder Consultative have covered Spot Sampling in respect of Citizen Science using schemes such as the Riverfly Partnership and if required the T&S SmartRivers.

With regards to Real-Time in River Monitoring, we consulted with [Redacted] (Environment Agency Lead Water Quality Instrumentation). [Redacted] recommend that we engage [Redacted] to provide an outline of which they have supplied below.



Scope:

To provide real time Water Quality monitoring to support a wider programme of monitoring on the River Ribble and River Hodder to assess the impact of the HARP works. Monitors would be located U/S and D/S of the proposed working areas. 30 minute real time data with following indicative measured parameters:

- Temperature
- Conductivity
- pH
- Dissolved Oxygen (Optical)
- Turbidity

Alarms can be set on the above parameters to provide early warning of potential events, sent via email or SMS.



Proposed Equipment:

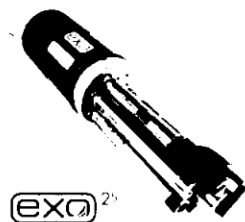
It is proposed that all sites would have standardised monitoring equipment consisting of the following elements:



ESNET2-L Portable Monitoring System

Complete portable station in IP66 Enclosure for direct deployment in riverside locations. Inputs for multiparameter sondes, level transducer, additional instrumentation as required.

Real time data via 3G/GPRS



Xylem EXO2 Multiparameter Sonde

Multiparameter instrument equipped with Temperature, Conductivity, pH, Turbidity and Dissolved Oxygen probes. Complete with central wiper and anti-fouling guard.

Instrument to be deployed directly into water course



20W Solar panel kit

Sufficient for 30 min data – 30W may be required for shaded areas

The equipment specified is used by the Environment Agency, Thames Water, Wessex Water, Yorkshire Water, Southern Water, Anglian Water and many consultants and other public bodies for provision of high resolution, real time monitoring.

Similar systems have been and are currently in use on a number of other watercourses in the United Utilities catchment including the River Ehen and River Leven.

Lease system – Complete Managed Service

This option is gives a high degree of flexibility in terms of sensor provision.

It is proposed in this case that the field work would be conducted by the [REDACTED] with calibrations at [REDACTED] so specification would entail:

- Equipment (ESNET, EXO sonde, Solar panel, connection cable)
- Measured Parameters – Temp, Cond, DO (Optical), Turbidity, pH
- 30 minute Real time data
- MeteorCloud web portal data access
- Calibration every 2 months at Meteor Lab
- Calibration records – Report for each instrument calibration available and electronically stored
- Courier collection and delivery of sondes



NOTE- 4 units would be required to provide monitoring at 2 U/S and 2 D/S locations

For purposes of comparison it is possible to provide a basic monitor which gives a broad view of river health by monitoring Temperature, Dissolved Oxygen and Conductivity. This requires basic monthly maintenance and occasional calibration check which can be performed in the field. Equipment service would be as follows:

- Lease of equipment (ESNET, Sonde, Solar panel, connection cable)
- Measured parameters – Temp, Conductivity, Dissolved Oxygen (Optical)
- 30 minute Real time data
- [Redacted] web portal data access

All field work and calibration is performed by [Redacted]

Quality Assurance

One of the key components of the [Redacted] is to monitor the Water Quality data in a proactive and holistic way.

This is achieved through examination of the current data and previous trends for every site, each working day. This enables the team to build a picture of the Water Quality characteristics of the catchments. This is reinforced through automated alarms which also flag suspect data.

7.0 Data Representation and Sharing

The [Redacted] is the primary tool for data dissemination and display. This enables users to view data in graphical, tabular and geospatial modes.

[Redacted] provides a clear and intuitive interface to view complex data. A typical example display:





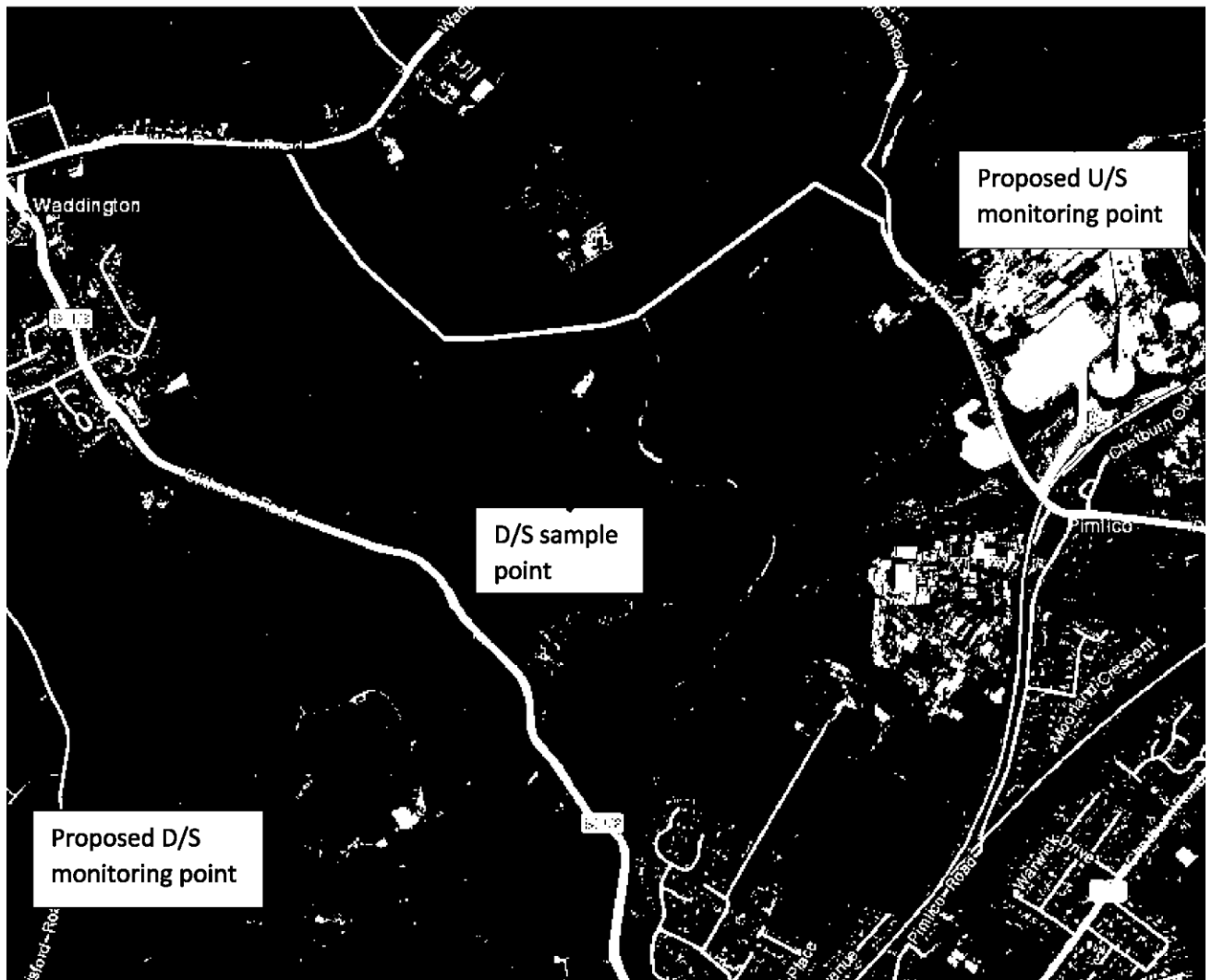
This shows a typical rain event passing through a catchment, specifically:

- Conductivity (Blue) – drop as rain dilutes the river water
- Turbidity (Brown) – increase as runoff washed into the river
- Temperature (Red) – Drops as a result of the rain
- Dissolved Oxygen (Light Blue) – Slight increase during the event

The [REDACTED] is used across the EA and other Water utilities and is a familiar tool for many Water Quality data users. As part of the ongoing service the following elements are included:

- User training – Online training in use of the [REDACTED]
- Telephone and email support
- User setup – Setup of new users and security levels
- Alarm setup – Basic alarm setup and maintenance

West Bradford – River Ribble



Upstream monitoring point:



It is proposed to use the structure of the old pumping station building to suspend the sonde into the river. This is sufficiently far upstream of the proposed works to provide a consistent baseline measurement of the river:



Baseline Measurements – Taken at 09.50am on 15-06-2021:

Parameter	Measurement
Temperature	16.6° C
Conductivity	396 μ S
Turbidity	3.4 NTU
Dissolved Oxygen	120%

All parameters are within typical ranges for a healthy river in the geographic area

Downstream monitoring point:

It is proposed to locate the equipment on the weir structure:



This is sufficiently downstream of the works to encompass all of the working area, allowing for the topography of the area and tributaries which may be impacted.

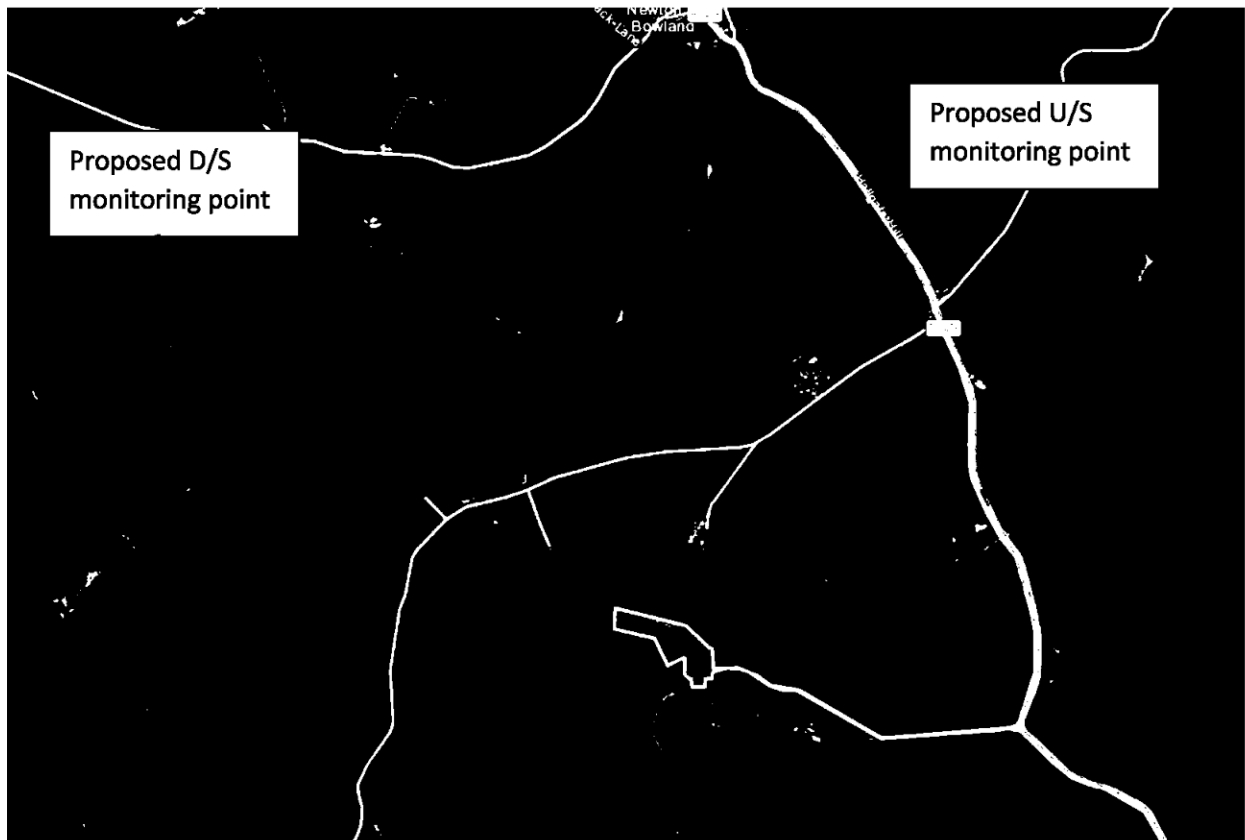


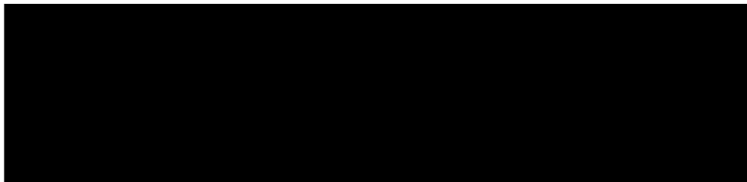
Baseline Measurements – Taken at 10.30am on 15-06-2021:

Parameter	Measurement
Temperature	17.34° C
Conductivity	437 μ S
Turbidity	4.0 NTU
Dissolved Oxygen	152.8%

All parameters are within typical ranges for a healthy river in the geographic area. The data shows a small variance due to potential impact from tributary and river warming during the day.

Marl Hill – River Hodder





Upstream monitoring point:

It is proposed mount the instrumentation onto the existing stone bank wall with the sonde suspended into the river. This is sufficiently far upstream of the proposed works to provide a consistent baseline measurement of the river:



Baseline Measurements – Taken at 11.50am on 15-06-2021:

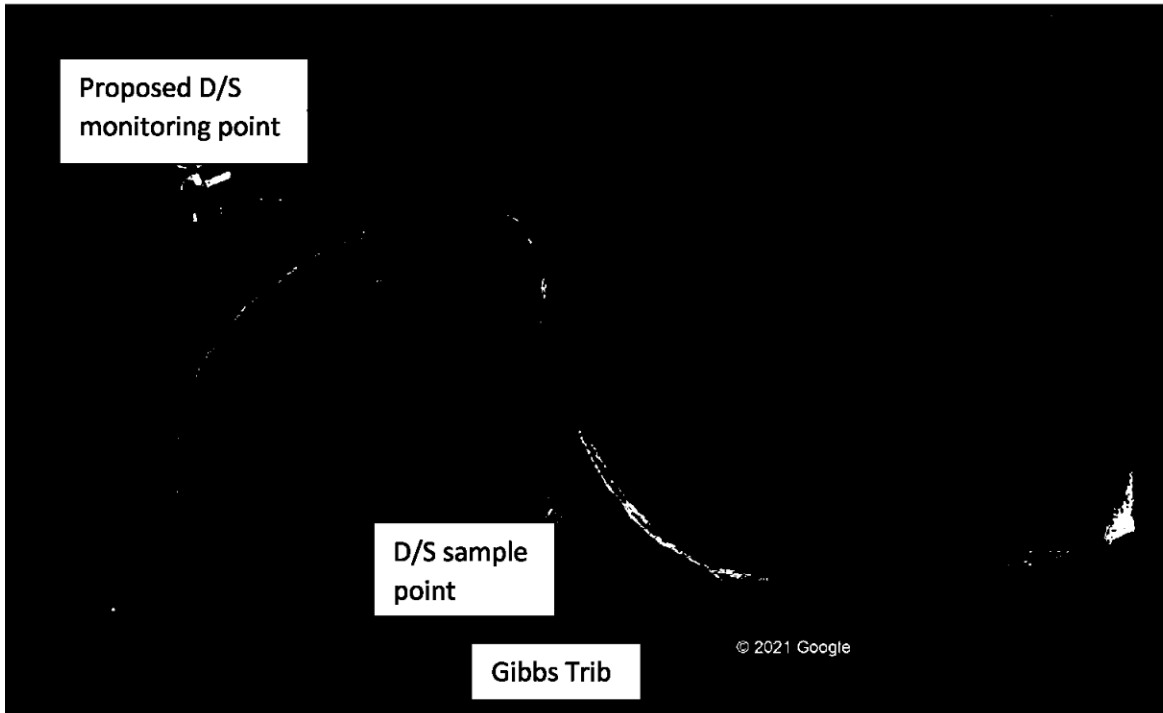
Parameter	Measurement
Temperature	14.1° C
Conductivity	91 µS
Turbidity	1.8 NTU
Dissolved Oxygen	105%

All parameters are within typical ranges for a healthy river in the geographic area.

Downstream monitoring point:

It is proposed to mount the downstream monitor on the pipeline bridge structure downstream of the Gibbs Tributary which may also be impacted by the works:





Baseline Measurements – Taken at 12.30am on 15-06-2021:

Parameter	Measurement
Temperature	13.9° C
Conductivity	182 µS
Turbidity	0.7 NTU
Dissolved Oxygen	106%

All parameters are within typical ranges for a healthy river in the geographic area.

Summary

The proposed systems for these sites would provide a clear indication of baseline river conditions upstream and downstream of the intended working areas.

Used in conjunction with spot sampling and ecological surveys this will provide a comprehensive view of any potential impact of the works on the river.

It is recommended that the systems are deployed 12 months before the start of any works to give a complete and representative baseline of the river conditions across the four seasons.

Alarms can be set against the measured parameters to enable further sampling to take place or trigger autosampler runs.

