

SCOPING OPINION:

Proposed A585 Windy Harbour to Skippool Improvement Scheme

Case Reference: TR010035

Adopted by the Planning Inspectorate (on behalf of the Secretary of State for Communities and Local Government) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

December 2017

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1. INTRODUCTION

1.1 Background

- 1.1.1 On 08 November 2017, the Planning Inspectorate (the Inspectorate) on behalf of the Secretary of State (SoS) received a scoping request from Highways England (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed A585 Windy Harbour to Skippool Improvement Scheme (the Proposed Development).
- 1.1.2 In accordance with Regulation 10 of the EIA Regulations, an Applicant may ask the SoS to state in writing its opinion *'as to the scope, and level of detail, of the information to be provided in the environmental statement'*.
- 1.1.3 This document is the Scoping Opinion (the Opinion) provided by the Inspectorate on behalf of the SoS in respect of the Proposed Development. It is made on the basis of the information provided in the Applicant's report entitled 'A585 Windy Harbour to Skippool Improvement Scheme Environmental Impact Assessment Scoping Report' (the Scoping Report). This Opinion can only reflect the proposals as currently described by the Applicant. The Scoping Opinion should be read in conjunction with the Applicant's Scoping Report.
- 1.1.4 The Applicant has notified the SoS under Regulation 8(1)(b) of the EIA Regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development. Therefore, in accordance with Regulation 6(2)(a) of the EIA Regulations, the Proposed Development is EIA development.
- 1.1.5 Regulation 10(9) of the EIA Regulations requires that before adopting a scoping opinion the Inspectorate must take into account:
- (a) *any information provided about the proposed development;*
 - (b) *the specific characteristics of the development;*
 - (c) *the likely significant effects of the development on the environment;*
and
 - (d) *in the case of a subsequent application, the environmental statement submitted with the original application.*
- 1.1.6 This Opinion has taken into account the requirements of the EIA Regulations as well as current best practice towards preparation of an ES.
- 1.1.7 The Inspectorate has consulted on the Applicant's Scoping Report and the responses received from the consultation bodies have been taken into account in adopting this Opinion (see Appendix 2).

- 1.1.8 The points addressed by the Applicant in the Scoping Report have been carefully considered and use has been made of professional judgement and experience in order to adopt this Opinion. It should be noted that when it comes to consider the ES, the Inspectorate will take account of relevant legislation and guidelines. The Inspectorate will not be precluded from requiring additional information if it is considered necessary in connection with the ES submitted with the application for a Development Consent Order (DCO).
- 1.1.9 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (eg on submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or associated development or development that does not require development consent.
- 1.1.10 Regulation 10(3) of the EIA Regulations states that a request for a scoping opinion must include:
- (a) a plan sufficient to identify the land;*
 - (b) a description of the proposed development, including its location and technical capacity;*
 - (c) an explanation of the likely significant effects of the development on the environment; and*
 - (d) such other information or representations as the person making the request may wish to provide or make.*
- 1.1.11 The Inspectorate considers that this has been provided in the Applicant's Scoping Report. The Inspectorate is satisfied that the Scoping Report encompasses the relevant aspects identified in the EIA Regulations.
- 1.1.12 In accordance with Regulation 14(3)(a), where a scoping opinion has been issued in accordance with Regulation 10 an ES accompanying an application for an order granting development consent should be based on *'the most recent scoping opinion adopted (so far as the proposed development remains materially the same as the proposed development which was subject to that opinion)'*.
- 1.1.13 The Inspectorate notes that an assessment under The Conservation of Habitats and Species Regulations 2017 (as amended) (the Habitats Regulations) will accompany the DCO application. The Habitats Regulations Assessment (HRA) report should be referenced in the ES and the HRA report should in turn contain references to where the information on which it is based can be found in the ES.

1.2 The Planning Inspectorate's Consultation

- 1.2.1 In accordance with Regulation 10(6) of the EIA Regulations the Inspectorate has consulted the consultation bodies before adopting a scoping opinion. A list of the consultation bodies formally consulted by the Inspectorate is provided at Appendix 1. The consultation bodies have been notified under Regulation 11(1)(a) of the duty imposed on them by Regulation 11(3) of the EIA Regulations to make information available to the Applicant relevant to the preparation of the ES. The Applicant should note that whilst the list can inform their consultation, it should not be relied upon for that purpose.
- 1.2.2 The list of respondents who replied within the statutory timeframe and whose comments have been taken into account in the preparation of this Opinion is provided, along with copies of their comments, at Appendix 2, to which the Applicant should refer in undertaking the EIA.
- 1.2.3 The ES submitted by the Applicant should demonstrate consideration of the points raised by the consultation bodies. It is recommended that a table is provided in the ES summarising the scoping responses from the consultation bodies and how they are, or are not, addressed in the ES.
- 1.2.4 Any consultation responses received after the statutory deadline for receipt of comments will not be taken into account within this Opinion. Late responses will be forwarded to the Applicant and will be made available on the Inspectorate's website. The Applicant should also give due consideration to those comments in carrying out the EIA.

1.3 Article 50 of the Treaty on European Union

- 1.3.1 On 23 June 2016, the United Kingdom (UK) held a referendum and voted to leave the European Union (EU). On 29 March 2017 the Prime Minister triggered Article 50 of the Treaty on European Union, which commenced a two year period of negotiations regarding the UK's exit from the EU. There is no immediate change to legislation or policy affecting national infrastructure. Relevant EU Directives have been transposed into UK law and those are unchanged until amended by Parliament.

2. THE PROPOSED DEVELOPMENT

2.1 Introduction

2.1.1 The following is a summary of the information on the Proposed Development and its site and surroundings prepared by the Applicant and included in their Scoping Report. The information has not been verified and it has been assumed that the information provided reflects the existing knowledge of the Proposed Development and the potential receptors/resources.

2.2 Description of the Proposed Development

2.2.1 The Applicant's description of the Proposed Development, its location and technical capacity (where relevant) is provided in the Scoping Report in Section 1.2 and Chapter 2.

2.2.2 The Proposed Development comprises an offline bypass between two junctions of the A585, at Windy Harbour and Skippool, as illustrated on Figure 1.2 of the Scoping Report. This would provide 4.86km of new dual carriageway capacity between the two junctions, bypassing the village of Little Singleton. The bypass would include new junctions at Skippool, Skippool Bridge and Poulton. The existing Skippool Bridge would be demolished and replaced; a new bridge would be constructed to carry the B5260 Lodge Lane over the bypass; and a new footbridge may also be required (the 'Grange Footbridge'). Four new retaining walls would be constructed and the existing Skippool Clough Culvert may require additional strengthening works. The existing A585 between Windy Harbour and Skippool would be de-trunked and retained as a local route.

2.2.3 The Proposed Development currently includes four sub-options:

- Option 1A – inclusion of a new junction between the bypass and Garstang Road (the 'Grange junction');
- Option 1B – not providing the Grange junction; construction of the Grange Footbridge over the new bypass;
- Option 1A above, plus an offline road link between the A588 Shard Road and the new bypass, tying in with Mains Lane; and
- Option 1B above, plus an offline road link between the A588 Shard Road and the new bypass, tying in with Mains Lane.

2.2.4 The existing A585 is a single carriageway trunk road near Poulton-le-Fylde, in the North-West of England. The A585 provides access from the motorway network (via junction 3 of the M55) into Fleetwood and the surrounding urban areas. The proposed bypass is located to the south of the existing A585 between the junctions at Windy Harbour and Skippool, primarily within the administrative boundary of Fylde Borough Council, with the western most extent of the application site falling within the

boundary of Wyre Borough Council. A site location plan is provided at Figure 1.1 of the Scoping Report.

- 2.2.5 The landscape surrounding the Proposed Development site is low lying and coastal, characterised by agricultural land, drainage ditches and blocks of mixed woodland. The River Wyre is located to the north of the site and parts of the site are located within Flood Zone 3. There are various designations covering this part of the River Wyre including Morecambe Bay and Duddon Estuary Special Protection Area (SPA), Morecambe Bay Ramsar site and Wyre Estuary Site of Special Scientific Interest (SSSI).
- 2.2.6 There is ribbon development alongside the existing A585 between Skippool and Little Singleton, with a greater concentration of residential dwellings located in proximity to the western section of the application site. There are conservation areas in Poulton-le-Fylde and Singleton and various other statutory and non-statutory heritage assets located on and around the application site, as illustrated on Figure 8.1 of the Scoping Report.

2.3 The Planning Inspectorate's Comments

Description of the Proposed Development

- 2.3.1 A detailed description of the construction and operation of the Proposed Development has been provided in Chapter 2 of the Scoping Report, supported by clear figures. The Inspectorate considers that the project description in the ES should be prepared to the standard set by the Scoping Report but also supplemented with details set out in the paragraphs below.
- 2.3.2 Construction of the Proposed Development is anticipated to last for approximately two years. Construction staging/phasing has not been determined at this stage (paragraph 2.13.1 of the Scoping Report). The ES should include details of how the construction would be phased, including the likely duration and location of construction activities. Construction traffic routing should be described (with reference to an accompanying plan), along with anticipated numbers/types of vehicle movements. A draft/outline Construction Traffic Management Plan should be provided with the DCO application and agreed with relevant consultees.
- 2.3.3 The ES should include a description of any temporary structures required during the construction phase (such as temporary bridges required to maintain access to the Public Rights of Way (PRoW), as indicated in Section 2.11 of the Scoping Report). The description should include the likely dimensions associated with these structures and the anticipated duration of their use.
- 2.3.4 Paragraph 2.13.15 of the Scoping Report refers to piling for bridge abutments. Details of the proposed piling should be provided in the ES,

including the anticipated number and sizes of piles, likely duration and locations. Where relevant to the technical assessments, it should be clear what parameters have been assumed for the piling (for example, maximum noise levels applicable to the activity).

- 2.3.5 The Inspectorate notes from paragraph 2.6.3 of the Scoping Report that the Applicant proposes to use borrow pits to excavate material required for construction. These would be returned to an agricultural use on completion of the works. The borrow pits would be located to the south of Little Singleton, on both the north and south sides of the proposed bypass. Figure 1.2 of the Scoping Report illustrates the potential location of the borrow pit to the north of the proposed bypass. The locations of both borrow pits should be confirmed on a plan accompanying the ES. The anticipated depths of the borrow pits should also be confirmed, along with the limits of deviation secured through the draft DCO (dDCO).
- 2.3.6 Figure 1.2 of the Scoping Report usefully identifies the proposed land uses within the application site boundary. The Inspectorate advises that a similar figure should be provided within the ES, ensuring all areas within the application site boundary are clearly labelled with proposed land uses. For example, with reference to Figure 1.2, the proposed land use of the following land parcels is unclear: the most northerly section of the application site adjacent to the River Wyre; the section to the south-east of the new Grange Junction; the linear section connecting A585 Garstang New Road to the River Wyre; and the eastern most extent of the application site. This should be clarified in the ES.
- 2.3.7 The locations of the four proposed retaining walls, artificial earthworks and soil stockpiles should be illustrated on plans accompanying the ES.
- 2.3.8 With regards to environmental mitigation, it is noted from paragraph 2.19.3 of the Scoping Report that earth mounding or acoustic fencing may be used to provide noise screening. The ES should confirm the heights of the earth mounds/acoustic fencing, identify the specific location(s) where these would be installed (with reference to an accompanying plan) and confirm at what point in the programme this would occur.
- 2.3.9 Paragraph 2.7.2 of the Scoping Report provides details of an alternative arrangement for the Lodge Lane Bridge. This would involve the proposed bypass being put in tunnel (described as a land bridge) for approximately 100m. If a tunnel design option is implemented, it would allow the area above the tunnel to be returned to pasture land and provide additional screening. The Inspectorate recommends that the decision regarding the tunnel design option is made prior to submission of the DCO application. This will allow for a robust assessment of likely significant effects and provide certainty to those likely to be affected.
- 2.3.10 The Inspectorate notes the four sub-options which are part of the Proposed Development (identified in paragraph 2.4.1 of the Scoping Report). It is not confirmed at what point in the programme the preferred

sub-option would be selected. As per the paragraph above relating to the land bridge, the Inspectorate recommends that the choice of sub-option is made prior to submission of the DCO application to allow for a robust assessment of likely significant effects.

- 2.3.11 Section 2.14 of the Scoping Report summarises the demolition works that would likely be required. The ES should provide full details of the necessary demolition works and it should be clear at what point in the programme this would occur. Where relevant, the Applicant should ensure that the aspect ES chapters assess the likely significant effects resulting from the demolition activities.
- 2.3.12 The Applicant's attention is drawn to the consultation response from Cadent Gas Ltd, which highlights infrastructure that could be affected by the Proposed Development. The Applicant should take into account the locations of these assets in undertaking the various assessments as part of the ES, working in consultation with Cadent Gas Ltd.
- 2.3.13 The ES should provide details of the nature and quantity of materials used and waste generated, including justification of any key assumptions made. The likely impacts should be assessed; the Applicant is referred to Table 4.11 of this Scoping Opinion in this regard.

Alternatives

- 2.3.14 The EIA Regulations require that the Applicant provide 'A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects'.
- 2.3.15 The Inspectorate would expect to see a discrete section in the ES that provides details of the alternatives considered and the reasoning for the selection of the chosen option(s), including a comparison of the environmental effects.
- 2.3.16 The Scoping Report describes the alternatives considered to date in Chapter 3. The alternatives section of the ES should also include reference to the sub-options (identified in paragraph 2.4.1 of the Scoping Report). Particular emphasis should be placed on justifying the chosen arrangement for the bridge at Lodge Lane.

Flexibility

- 2.3.17 The Applicant's attention is drawn to the Inspectorate's Advice Note 9 'Using the 'Rochdale Envelope'¹, which provides additional details on the recommended approach.
- 2.3.18 The Applicant should make every attempt to narrow the range of options and explain clearly in the ES which elements of the Proposed Development have yet to be finalised and provide the reasons. At the time of application, any Proposed Development parameters should not be so wide-ranging as to represent effectively different developments. The development parameters will need to be consistently and clearly defined in both the dDCO and in the accompanying ES. It is a matter for the Applicant, in preparing an ES, to consider whether it is possible to robustly assess a range of impacts resulting from a large number of undecided parameters. The description of the Proposed Development in the ES must not be so wide that it is insufficiently certain to comply with the requirements of Regulation 14 of the EIA Regulations.
- 2.3.19 It should be noted that if the Proposed Development changes substantially during the EIA process and prior to submission of the DCO application, the Applicant may wish to consider requesting a new scoping opinion.

¹ Advice Note Nine: Using the Rochdale Envelope. 2012. Available at:
<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

3. EIA APPROACH

3.1 Introduction

- 3.1.1 This section contains the Inspectorate's specific comments on the scope and level of detail of information to be provided in the Applicant's ES. General advice on the presentation of an ES is provided in the Inspectorate's Advice Note Seven 'Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping'² and associated appendices.
- 3.1.2 Aspects/matters are not scoped out unless specifically addressed and justified by the Applicant, and confirmed as being scoped out by the Inspectorate. The ES should be based on the Scoping Opinion in so far as the Proposed Development remains materially the same as the Proposed Development described in the Applicant's Scoping Report. The Inspectorate has set out in this Opinion where it has/has not agreed to scope out certain aspects or matters on the basis of the information available at this time. The Inspectorate is content that this should not prevent the Applicant from subsequently agreeing with the relevant consultees to scope such aspects/matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects/matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 3.1.3 Where relevant, the ES should provide reference to how the delivery of measures proposed to prevent/minimise adverse effects is secured through DCO requirements (or other suitably robust methods) and whether relevant consultees agree on the adequacy of the measures proposed.

3.2 Relevant National Policy Statements (NPSs)

- 3.2.1 Sector-specific NPSs are produced by the relevant Government Departments and set out national policy for NSIPs. They provide the framework within which the Examining Authority (ExA) will make their recommendation to the SoS and include the Government's objectives for the development of NSIPs. The NPSs may include environmental requirements for NSIPs, which Applicants should address within their ES.
- 3.2.2 The designated NPS relevant to the Proposed Development is the National Policy Statement for National Networks (NPSNN).

² Advice Note Seven: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping. Available from:
<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

3.3 Scope of Assessment

General

- 3.3.1 The Inspectorate recommends that in order to assist the decision-making process, the Applicant uses tables:
- To demonstrate how the assessment has taken account of this Opinion;
 - To identify and collate the residual effects after mitigation for each of the aspect topics, including the relevant interrelationships and cumulative effects;
 - To set out the proposed mitigation and/or monitoring measures including cross-reference to the means of securing such measures (eg a dDCO requirement);
 - To describe any remedial measures that are identified as being necessary following monitoring; and
 - To identify where details are contained in the HRA report (where relevant), such as descriptions of European sites and their locations, together with any mitigation or compensation measures, are to be found in the ES.
- 3.3.2 The Inspectorate considers that where a DCO application includes works described as 'associated development', that could themselves be defined as an improvement of a highway, the Applicant should ensure that the ES accompanying that application distinguishes between; effects that primarily derive from the integral works which form the proposed (or part of the proposed) NSIP and those that primarily derive from the works described as associated development, for example through a suitably compiled summary table. This will have the benefit of giving greater confidence to the Inspectorate that what is proposed is not in fact an additional NSIP defined in accordance with s22 of the PA2008.
- 3.3.3 Chapter 5 of the Scoping Report outlines the general approach to the EIA. The Design Manual for Roads and Bridges (DMRB) and accompanying Interim Advice Notes (IANs) will be used as the main source of guidance, with relevant aspect-specific guidance used as appropriate.
- 3.3.4 Paragraph 5.11.3 of the Scoping Report explains that due to the long design life of the Proposed Development (40 years for a new carriageway), it is not considered appropriate for decommissioning to form part of each environmental aspect assessment in the ES. The Inspectorate considers this to be an acceptable approach taking into account the nature and characteristics of the Proposed Development. However, the Inspectorate considers that any decommissioning associated with dismantling and replacing particular elements of the Proposed Development (e.g. lighting columns) once they reach the end of their design life should be assessed if significant effects are likely to

occur. The approximate design life of the various development components should be explained in the ES.

- 3.3.5 Paragraph 2.10.1 of the Scoping Report explains that the existing A585 would be de-trunked as part of the scheme. As part of the de-trunking a number of alterations and other works are proposed along the existing A585. Where relevant, these alterations and works should be considered in the aspect topics.
- 3.3.6 Paragraphs 2.4.1 and 2.7.2 of the Scoping Report explain the four sub-options and the option for a land bridge at Lodge Lane, respectively. Where relevant, these options should be considered in the aspect topics.
- 3.3.7 It is not clear from all of the aspect chapters in the Scoping Report whether the study areas proposed for the ES assessments are the same as those identified for the purposes of scoping. The Applicant is advised to clearly define the study areas adopted for each aspect assessment in the ES.

Baseline Scenario

- 3.3.8 The ES should include a description of the baseline scenario with and without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.

Forecasting methods or evidence

- 3.3.9 The ES should contain the timescales upon which the surveys that underpin the technical assessments have been based. For clarity, this information should be provided either in the introductory chapters of the ES (with confirmation that these timescales apply to all chapters), or in each aspect chapter.
- 3.3.10 The Inspectorate expects the ES to include a chapter setting out the overarching methodology for the EIA, which clearly states which effects are 'significant' and 'non-significant' for the purposes of the EIA. Any departure from that methodology should be described in individual aspect assessment chapters.
- 3.3.11 The ES should include details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.

Residues and emissions

- 3.3.12 The EIA Regulations require an estimate, by type and quantity, of expected residues and emissions. Specific reference should be made to water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases, where relevant. This information

should be provided in a clear and consistent fashion and may be integrated into the relevant aspect assessments.

Mitigation

- 3.3.13 Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should also address how any mitigation proposed is secured, ideally with reference to specific DCO requirements or other legally binding agreements.
- 3.3.14 The Inspectorate notes that a Construction Environmental Management Plan (CEMP) (which would include a Pollution Prevention Plan) is to be produced. Where the ES relies upon mitigation measures which would be secured through the CEMP, it should be demonstrated (with clear cross-referencing) where each measure is set out in the CEMP. The Applicant should provide draft copies of this document appended to the ES and/or demonstrate how it will be secured.

Vulnerability of the development to risks of major accidents and/or disasters

- 3.3.15 The ES should include a description of the potential vulnerability of the Proposed Development to risks of major accidents and/or disasters, including vulnerability to climate change, which are relevant to the Proposed Development. Relevant information available and obtained through risk assessments pursuant to European Union legislation such as Directive 2012/18/EU of the European Parliament and of the Council or Council Directive 2009/71/Euratom or relevant assessments carried out pursuant to national legislation may be used for this purpose, provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.
- 3.3.16 Section 5.13 of the Scoping Report briefly explains how the Applicant intends to approach the assessment of major accidents and disasters in the ES. The Inspectorate welcomes that both man-made and naturally occurring major accidents and disasters would be identified and considered in the ES. The Inspectorate considers that the Proposed Development is potentially vulnerable to severe weather (such as storms and floods, the risk of which may be exacerbated by climate change) and road accidents, which could also potentially result in environmental pollution incidents. The potential for major accidents and disasters to occur as a consequence of the Proposed Development (such as the collapse of structures) should also be assessed.
- 3.3.17 A qualitative assessment is proposed and the conclusions would be reported in the relevant environmental aspect chapters. The Inspectorate agrees with this approach and advises that the ES should clearly set out

the approach to the assessment and explain how the conclusions have been reached.

Transboundary effects

- 3.3.18 Schedule 4 Part 5 of the EIA Regulations requires a description of the likely significant transboundary effects to be provided in an ES. The Inspectorate notes from Appendix C of the Scoping Report that the Applicant has not identified any likely significant effects on another European Economic Area (EEA) State. Appendix C states that the Applicant will confirm this position in the ES.
- 3.3.19 Regulation 32 of the EIA Regulations inter alia requires the Inspectorate to publicise a DCO application on behalf of the SoS if it is of the view that the proposal is likely to have significant effects on the environment of another EEA State, and where relevant, to consult with the EEA State affected.
- 3.3.20 The Inspectorate considers that where Regulation 32 applies, this is likely to have implications for the examination of a DCO application. The Inspectorate welcomes the Applicant's intention for the ES to confirm whether the Proposed Development has the potential for significant transboundary impacts and if so, what these are and which EEA States would be affected.

A reference list

- 3.3.21 A reference list detailing the sources used for the descriptions and assessments must be included in the ES.

3.4 Confidential Information

- 3.4.1 In some circumstances it will be appropriate for information to be kept confidential. In particular, this may relate to information about the presence and locations of rare or sensitive species such as badgers, rare birds and plants where disturbance, damage, persecution or commercial exploitation may result from publication of the information. Where documents are intended to remain confidential the Applicant should provide these as separate paper and electronic documents with their confidential nature clearly indicated in the title, and watermarked as such on each page. The information should not be incorporated within other documents that are intended for publication or which the Inspectorate would be required to disclose under the Environmental Information Regulations 2014.

4. ASPECT BASED SCOPING TABLES

4.1 Health

(Scoping Report Insert 5-1)

<p>The Scoping Report proposes that human health is addressed in the following aspect assessments:</p> <ul style="list-style-type: none"> • Air Quality; • Noise and Vibration; • Road Drainage and the Water Environment; • People and Communities; and • Geology and Contaminated Land. <p>Potential impacts on human health are noted in relation to air quality, noise, pollution incidents, flooding, driver stress, private property, journey amenity, severance and contaminated land.</p>			
ID	Para	Other points	Inspectorate's comments
1	5.3.3	Assessment of health effects	<p>The Inspectorate is content with the proposed approach to assess impacts on human health in the relevant aspect chapters of the ES. The Applicant should ensure the survey methodologies relevant to health impacts are clearly defined in the relevant aspect chapters.</p> <p>For clarity, the introductory section of the ES should contain a table which provides a clear cross-reference to where the relevant information on human health is located in the ES.</p>
2	Insert 5-1	Human health and water	<p>Insert 5-1 of the Scoping Report indicates that impacts on human health as a result of pollution incidents and flooding will be assessed in the Road Drainage and the Water Environment Chapter of the ES. However Chapter 13 of the Scoping Report (Road Drainage and the Water Environment) does not specifically refer to impacts on human health or how they will be assessed. The Inspectorate considers that the Road Drainage and the Water Environment chapter of the ES should include assessment of impacts on human health resulting from emissions to water. Surface water, groundwater and drinking water supplies should be considered, including how flood risk may affect this. The Applicant's attention is drawn to Public</p>

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			<p>Health England’s scoping consultation response in this regard.</p> <p>The assessment should assess impacts during both construction and operation of the Proposed Development and it should be clear how all necessary mitigation measures are secured through the DCO or other legally binding mechanisms.</p>
3	Insert 5-1	Human health and air quality	<p>In relation to the assessment of potential impacts on human health resulting from changes in air quality, the Inspectorate advises that the assessment should include consideration of impacts from construction dust.</p>
4	7.6.4	Human health and air quality	<p>It is noted that impacts associated with fine particulate matter (PM_{2.5}) would not be assessed as part of the air quality assessment. No evidence of the existing PM_{2.5} levels has been provided within the Scoping Report.</p> <p>The Inspectorate considers that the ES should include an assessment of human health impacts associated with increased PM_{2.5} resulting from the Proposed Development. Such an assessment has also been requested by Public Health England in their scoping consultation response. In determining significance of effect, the assessment should take into account performance against relevant target/ limit values.</p> <p>For the avoidance of doubt, the Inspectorate’s comments on this matter are also included in Table 4.3 of this Opinion (Air Quality).</p>
5	14.6.3	Impacts on construction/ maintenance workers	<p>Paragraph 14.6.3 of the Scoping Report explains that construction and maintenance workers have not been considered as receptors in the Geology and Contaminated Land aspect assessment, as they are governed by other Health and Safety legislation.</p> <p>The Inspectorate considers that there is insufficient evidence at this stage to confirm that there would not be significant effects on the health of construction/maintenance workers. Therefore, the Inspectorate does not agree that this matter can be scoped out and</p>

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			<p>considers that construction/maintenance workers should be assessed as receptors in the ES. The Inspectorate notes paragraph 4.81 of the NPSNN in this regard.</p> <p>For the avoidance of doubt, the Inspectorate's comments on this matter are also included in Table 4.10 of this Scoping Opinion (Geology and Contaminated Land).</p>
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4.2 Heat and Radiation

(Scoping Report Table 6-1)

<p>The Scoping Report states that the Proposed Development would not introduce any sources of radiation and would generate only limited amounts of heat (from minor elements such as lighting).</p>			
ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	Table 6-1	Heat and radiation emissions.	The Applicant proposes to scope out consideration of heat and radiation emissions. The Inspectorate does not anticipate significant effects from heat and radiation and is content that this matter can be scoped out of the EIA.

4.3 Air Quality

(Scoping Report Section 7)

It is proposed that the extent of the air quality study area would be determined with reference to the roads likely to be affected by changes in traffic flows, using the criteria outlined in paragraphs 3.12 to 3.16 of the DMRB HA207/07³.

Potential impacts on local and regional air quality resulting from the operation of the Proposed Development would be assessed in accordance with the guidance outlined in DMRB HA207/07, associated IANs and Defra's Local Air Quality Management Technical Guidance⁴. The impacts on the Air Quality Management Area (AQMA) at Chapel Street (1.2km south of the Skippool Junction, illustrated on Figure 7.1) would be assessed in the ES.

The Scoping Report identifies the potential for temporary adverse impacts on air quality during construction of the Proposed Development, arising from construction dust and vehicle emissions. Mitigation is proposed in the form of a CEMP.

During operation, positive or negative impacts on air quality could result from changes in traffic flows, as well as changes to distances between emission sources and sensitive receptors.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	7.8.2	Air quality impacts during construction	The Scoping Report proposes to scope out an assessment of air quality impacts during construction as significant effects are considered unlikely. The Inspectorate does not consider that there is sufficient evidence provided in the Scoping Report to support a decision to scope this matter out of the assessment. The Applicant proposes to apply the DMRB HA207/07 methodology to the assessment. The Inspectorate notes DMRB HA207/07 requires an assessment of air quality impacts from construction traffic if the activity is anticipated to last for more than 6 months. Therefore the Inspectorate considers that an assessment of air quality impacts during the construction phase, including impacts from construction traffic,

³ DMRB HA 207/07, Volume 11, Section 3, Part 1 'Air Quality' (May 2007)

⁴ Defra: Local Air Quality Management Technical Guidance (2016)

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			should be provided in the ES.
2	7.6.4	Methodology	<p>It is noted that impacts associated with fine particulate matter (PM_{2.5}) would not be assessed as part of the air quality assessment. No evidence of the existing PM_{2.5} levels has been provided within the Scoping Report.</p> <p>The Inspectorate considers that the ES should include an assessment of human health impacts associated with increased PM_{2.5} resulting from the Proposed Development. Such an assessment has also been requested by Public Health England in their scoping consultation response. In determining significance of effect, the assessment should take into account performance against relevant target/ limit values.</p>
	Para	Other points	Inspectorate's comments
3	7.2.1	Study area	The extent of the study area for the assessment should be illustrated on a plan in the ES.
4	7.5.1	Baseline data	The Inspectorate notes that local planning authority and Highways England data will be used to establish the baseline information, along with diffusion tube monitoring data which has been collected at the locations depicted on Figure 7.1 of the Scoping Report. The assessment in the ES should be undertaken on the basis of relevant and up to date baseline information and the extent of any likely changes within the study area. The Scoping Report does not state if additional diffusion tube sampling is considered necessary. The Applicant should discuss and agree with relevant consultees the need for additional diffusion tube monitoring to inform the baseline assessment.
5	7.6.5	Sensitive receptors	The Applicant outlines receptors that are potentially sensitive to changes in air quality in paragraph 7.6.5 of the Scoping Report, with reference to DMRB HA 207/07. The Inspectorate notes that in addition to those receptors referenced in paragraph 7.6.5, DMRB HA 207/07 states that particular attention should be paid to the location of the young, elderly and other

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			<p>susceptible populations.</p> <p>The Applicant should therefore include an assessment of impacts to relevant community facilities (in accordance with DMRB Volume 11, Section 2, Part 8) as sensitive receptors where they appear within the study area. The assessment should include impacts at both construction and operational stages of the Proposed Development.</p> <p>The ES should clearly define and justify the approach to identifying sensitive receptors in the assessment (both human and ecological). It is recommended that these are agreed with the relevant local planning authorities. Relevant ecological receptors responsive to impacts to air quality should be agreed with Natural England.</p>
6	7.6.5	Sensitive receptors	The location of all sensitive receptors should be identified on a plan within the ES.
7	7.8.1	Proposed level and scope of assessment	The Scoping Report does not state whether the approach to the assessment will be on a simple or detailed basis (in accordance with HA 207/07). The Applicant should discuss and agree with relevant consultees whether a simple or detailed level of assessment should be undertaken, having regard to existing background pollutant levels.
8	7.9.1	Methodology	The Scoping Report references a number of guidance documents which will inform the assessment methodology. The methodology should be clearly explained in the ES including how significance of effect will be determined.
9	7.10.1	Assumptions and limitations	The Applicant should set out assumptions relating to the A585 traffic model and the inclusion of committed developments. The details of the traffic modelling should be agreed with the relevant local authorities.
10	n/a	Methodology	The existing A585 between Windy Harbour and Skippool would be de-trunked and retained as a local route, which would require a number of alterations and other works. The ES should assess the potential air quality impacts associated with the construction and operation of the new bypass and the changes to the existing

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4.4 Cultural Heritage

(Scoping Report Section 8)

A study area of 1km from either side of the application site has been defined, as illustrated on Figure 8.1.

The impact assessment would follow various guidance and standards including the DMRB HA 208/07⁵, Historic England guidance on the setting of heritage assets⁶ and the Chartered Institute for Archaeologists (CIfA)⁷.

The Scoping Report identifies potential direct effects on non-designated heritage assets (Ribchester to Poulton Roman Road and Singleton Park) and unknown archaeology located within the application site boundary. Potential indirect impacts on non-designated heritage assets are also identified. Slight adverse effects (not significant) are anticipated on historic landscapes and the Grade II listed Ice House at Singleton Hall.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	Table 6.1; para 8.8.3	Potential effects on the historic landscape	<p>It is proposed that an assessment of impacts on the historic landscape is scoped out of the ES, as significant effects are considered unlikely based on assessment work undertaken at the Options stage. Evidence of this assessment work has not been provided as part of the Scoping Report.</p> <p>The Inspectorate considers that the rural landscape within which the proposed bypass would be located is largely without modern intervention and does have historic landscape character relating to the designated and non-designated heritage assets identified in the Scoping Report. On the basis of the evidence provided, the Inspectorate does not consider that likely significant effects on historic landscapes can be ruled out. Accordingly, the ES</p>

⁵ DMRB Volume 11, Section 3, Part 2 'Cultural Heritage' (HA 208/07)

⁶ Historic England - The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (2015)

⁷ CIfA Standard and Guidance for Historic Environment Desk-based Assessment (2014); CIfA Code of Conduct (2014)

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			<p>should consider potential effects on historic landscapes, unless evidence is provided to demonstrate the absence of significant effects and it is agreed with Historic England that this matter can be scoped out of the ES.</p> <p>The Applicant should note the requirements of the NPSNN, which sets out at paragraph 5.145 that the Applicant's assessment should include any significant effects on landscape components and landscape character (including historic landscape characterisation).</p>
2	Table 6.1; para 8.8.4	Effects on statutory designated heritage assets	<p>The Scoping Report explains that the impact on designated heritage assets within the study area is anticipated to be at worst slight adverse (not significant) in respect to the Grade II listed Ice House at Singleton Hall. The Applicant therefore proposes to scope out an assessment of impacts to designated heritage assets out of the ES.</p> <p>The Inspectorate acknowledges that intervening vegetation is present which may limit the degree of impact to the setting of the Ice House. However due to the proximity of the proposed bypass to the Ice House, the Inspectorate considers that there is potential for significant effects to the setting of this asset (particularly from increased noise, vibration and pollution). Impacts on the setting of the Ice House should therefore be assessed in the ES.</p> <p>In line with this, the Inspectorate notes the potential for increased levels of noise from the proposed bypass and the potential for this to impact settings on other relevant statutory designated heritage assets identified to the south of the bypass route (for example, the listed buildings on the edge of Little Poulton and Singleton Conservation Area). The ES should assess the anticipated impact to the settings of these assets.</p>
	Para	Other points	Inspectorate's comments
3	8.2.1	Study area	The ES should provide a robust justification as to why the 1km study area is appropriate and sufficient to capture all heritage assets which could experience impacts on their setting – taking into

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			<p>account for example, visual intrusion and or increased noise emissions.</p> <p>To support this justification, the Applicant is advised to refer to the Zone of Visual Influence (ZVI) developed for the Landscape and Visual Impact Assessment and the conclusions of the noise impact assessment.</p>
4	8.7.2	Potential effects	<p>The Inspectorate notes the potential for impacts on buried archaeological resource. In addition to the guidance set out in paragraph 8.9.1 of the Scoping Report, the Inspectorate considers that the ES assessment of impacts on buried archaeology should take into account the guidance contained in Historic England's guidance document 'Preserving Archaeological Remains'⁸.</p> <p>The Inspectorate considers that investigation strategies should be produced for areas of new land take to ensure a robust assessment of likely significant effects. If the investigation strategies demonstrate the need for further archaeological investigations, these should be completed (and the assessment reported in the ES) prior to submission of the DCO application, unless otherwise agreed with relevant statutory consultees.</p>
5	8.7.6-7	Mitigation	<p>The ES should set out the proposals for the recording of any archaeological resource which would be permanently lost as a result of the Proposed Development and seek to agree the approach with relevant consultees.</p>
6	8.9.2	Level of assessment	<p>Paragraph 8.9.2 of the Scoping Report refers to a detailed assessment (as defined in DMRB HA 208/07) for archaeological remains and non-designated assets; whereas Table 6.1 states that a simple assessment is proposed.</p> <p>For the avoidance of doubt, the Inspectorate considers that the level of</p>

⁸ Preserving Archaeological Remains: Decision taking for sites under development (Historic England, 2016)

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			assessment should be detailed particularly on the basis that there are potential direct physical impacts on non-designated cultural heritage assets.
7	8.9.9	Assessment methodology	The ES should expand upon the information provided in paragraph 8.9.9 of the Scoping Report to clearly explain how the significance of effect has been determined, with reference to relevant guidance. It should be clear how professional judgement has been applied.
8	8.10.2	Archaeological potential	The ES should confirm whether the Proposed Development falls within any areas designated as being of high archaeological potential/areas of archaeological importance. These areas should be illustrated on a plan accompanying the ES.

4.5 Biodiversity

(Scoping Report Section 9)

The study area comprises the application site and a 1km buffer for non-statutory designated sites, 2km for Natura 2000 sites (Special Areas of Conservation (SAC), Sites of Community Importance (SCI) and candidate SACs, Special Protection Areas (SPA) and potential SPAs designated under the Habitats and Birds Directives. The study area is extended to 30km for SACs where bats are a qualifying feature. This is shown on Figure 9.1 of the Scoping Report.

Table 9-3 identifies a number of Important Ecological Features within the study area, including Morecambe Bay and Duddon Estuary SPA, Wyre Estuary Site of Special Scientific Interest (SSSI), several local wildlife sites and various habitats of principal importance (S41 habitats) including coastal saltmarsh and mudflats.

The guidance to be used in the ecological impact assessment is described in paragraph 9.3.3 of the Scoping Report and comprises the DMRB Volume 11, Section 3, Part 4, IAN 130/10 (2010), IAN 141/11 (2011) and the Chartered Institute for Ecology and Environmental Management (CIEEM) guidelines⁹. The broad approach that will be taken to the ecological impact assessment, including the determination of the significance of effects, is described in paragraphs 9.9.10 – 9.9.12 of the Scoping Report.

Paragraph 9.7.1 of the Scoping Report sets out a number of potential impacts from construction works. Paragraph 9.7.18 sets out a number of potential impacts from the operational phase of the Proposed Development.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	9.8.5 & Table 6-1	River Wyre – S41 Habitat	The assessment of impacts to River Wyre S41 habitat are proposed to be scoped out on the basis that any impacts would be largely restricted to pollution and would be mitigated by water management processes. The Inspectorate agrees that an assessment of impacts to the River Wyre from pollution can be scoped out. However as this is based on the successful delivery of mitigation measures, the ES must clearly explain the methods to be used and how they are secured. The measures put forward should address impacts during both the construction and operational phases of

⁹ CIEEM Guidelines for Ecological Impact Assessment in the UK and Ireland (2016)

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			the development.
2	9.8.5 & Table 6-1	Other (non S41) habitats	On the basis of the evidence provided in the Scoping Report, the Inspectorate agrees that significant effects on non-S41 habitat within the study area are not likely and agrees that this matter can be scoped out.
3	9.8.4 & Table 6-1	Reptiles & water vole	<p>Further assessment of impacts to these species has been scoped out on the basis of desk studies and targeted surveys which mean it is likely that they are absent from the study area.</p> <p>However Table 6-1 of the Scoping Report also states that these species may be present within the study area but due to their low status, low ecological value or distance from the Proposed Development, significant effects are unlikely and therefore they are proposed to be scoped out of further assessment.</p> <p>The two statements in the Scoping Report are contradictory. The information is ambiguous and therefore not sufficiently certain to support the conclusions reached about the presence or absence of these species in the study area. The Inspectorate cannot agree to scope out effects on these features with the information provided. Accordingly the ES should include an assessment of these matters and/or demonstrate agreement with the relevant consultees that significant effects are not likely to occur.</p>
4	9.8.5	Aquatic invertebrates, terrestrial invertebrates, badger, brown hare, hedgehog, fish, amphibian species other than great crested newt, invasive flora, protected and notable plants and fungi.	<p>The information in the Scoping Report is not sufficiently detailed to understand the extent of data collection carried out in order to reach the conclusions about the presence or absence of these species in the study area.</p> <p>In the absence of sufficient evidence to demonstrate the absence of likely significant effects, the Inspectorate cannot agree to scope out effects on these features. Accordingly the ES should include either an assessment of these matters, or the evidence that supports the decision to scope them out together with agreement with the relevant consultees that significant</p>

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			effects are not likely to occur. If mitigation is being relied on to avoid significant effects, then the measures should be clearly described in the ES and it should be clear how these would be delivered and secured.
	Para	Other points	Inspectorate's comments
5	9.2	Study area	The study area has been defined on the basis of the guidance contained in the DMRB. However the DMRB guidance uses set distances which are potentially distinct from the zone of influence for the Proposed Development. The ES should clearly demonstrate how the assessment of effects reflects the area which will actually be affected by the Proposed Development.
6	9.7.1	Impacts from construction	If it is likely that construction work will take place during the hours of darkness, then the effects of lighting should also be assessed in the ES.
7	9.7.1	Impacts from construction	<p>This paragraph refers to potential indirect impacts on ecological features as a result of changes to air quality during construction. However Table 6-1 of the Scoping Report proposes that the assessment of air quality impacts during construction will be scoped out.</p> <p>As set out in Table 4.3 of this Opinion (Air Quality), the Inspectorate considers that the Scoping Report does not provide sufficient evidence to demonstrate that air quality impacts during construction can be scoped out of the assessment. An assessment of air quality impacts during the construction phase and the resultant likely significant effects on sensitive ecological receptors should therefore be provided in the ES (as appropriate). Relevant ecological receptors responsive to impacts to air quality should be discussed and agreed with Natural England.</p>
8	9.7.18	Impacts from operation	The Inspectorate notes that Skippool Marsh and Thornton Bank Biological Heritage Site (BHS) is adjacent to the application site (as shown on Figure 9.2 of the Scoping Report). On the basis of the evidence provided, a likely significant effect on the BHS as a result of changes to air quality

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			cannot be excluded. This matter should be assessed in the ES. .
9	9.7.19	Impacts from operation	This paragraph states that ' <i>Effects on species would be addressed during construction...and it is not anticipated that any further impacts would arise during operation</i> '. This appears to contradict paragraph 9.7.18 of the Scoping Report, which identifies potential impacts on ecological receptors during operation which are different to the impacts identified in relation to construction. The ES must assess all the impacts which could result in likely significant effects through all phases of the Proposed Development.
10	9.7.23	Ancient woodland	The Inspectorate notes the reference to ancient woodland in paragraph 9.7.23 of the Scoping Report. The ES should identify and assess any ancient woodland which would be impacted by the Proposed Development.
11	9.7.24	Enhancement considerations	If enhancement measures are to be delivered, then the ES should make clear what these measures are and how they will be delivered. It should also make a clear distinction between measures which are required to mitigate or compensate for significant effects and those which represent genuine enhancement to ecological receptors.
12	Appendix B	Location of breeding bird surveys	Table 1.2 states that breeding bird surveys will be carried out using transects within 200m of the scheme options. However barn owl populations have been recorded as being affected by collision risk mortality up to 1.5km from road boundaries. If barn owls are likely to be present, then the assessment should include consideration of impacts to this species. The Applicant should liaise with Natural England to ensure the assessment appropriately addresses the risk to barn owls.

4.6 Landscape

(Scoping Report Section 10)

A study area of 1km from the application site is proposed, as illustrated on Figure 10.1.

The assessment would follow guidance for a detailed assessment from IAN 135/10¹⁰, as well as the Guidelines for Landscape and Visual Impact Assessment (GLVIA)¹¹ and guidance from the Landscape Institute¹².

The Scoping Report explains that the introduction of temporary and permanent structures, lighting, signage and the clearance of vegetation would potentially result in adverse effects on landscape, townscape and visual amenity during both construction and operation of the Proposed Development.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
	n/a	None identified.	n/a
	Para	Other points	Inspectorate's comments
1	10.2.1; Figure 10.1	Study Area	<p>The Proposed Development would introduce a new road bypass and new structures into a generally flat, rural landscape setting. Considering this, together with the extent of the Zone of Theoretical Visibility (ZTV) (as illustrated on Figure 10.1 of the Scoping Report), the Inspectorate considers that landscape and visual impacts could occur beyond 1km from the application site.</p> <p>The ES should fully justify the study areas used for the landscape and visual assessment. For visual effects, the study area should extend to the whole of the area from which the Proposed Development could be visible. It should be clear how this area has been defined with reference to the ZTV and site visits. Relevant long distance views should also be identified and assessed where significant effects may</p>

¹⁰ IAN 135/10 Landscape and Visual Effects Assessment

¹¹ GLVIA, 3rd Edition: Landscape Institute of Environmental Management and Assessment (2013)

¹² Landscape Institute Advice Note 01/11 Photography and Photomontage in Landscape and Visual Impact Assessment (2011)

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			occur.
2	10.5.12	Viewpoints and photomontages	<p>The Inspectorate notes that the representative viewpoints and photomontages will be discussed and agreed in consultation with the relevant planning authorities.</p> <p>The Inspectorate advises that these should capture views between the Proposed Development and the Ice House at Singleton Hall, Singleton Park, Singleton Conservation Area, the Wyre Estuary Country Park and Poulton New Cemetery.</p> <p>From Figure 10.1 of the Scoping Report it appears there is a lack of viewpoints in the eastern section of the Proposed Development. The ES should cover the range of views of the Proposed Development which would be possible; the Applicant should ensure that appropriate viewpoints in the eastern section are discussed and agreed in consultation with the relevant planning authorities.</p>
3	10.7.3	Reinstatement of land	<p>The ES should include clear proposals for the reinstatement of land which is required following construction, with reference to accompanying plan(s).</p> <p>This should include proposals for the restoration and aftercare of the borrow pits which are to be located south of Little Singleton.</p> <p>If the land bridge option (as described in paragraph 2.7.2 of the Scoping Report) is pursued, proposals for returning the area above the bypass to pasture land should also be included in the ES.</p>
4	10.7.1-2	Potential effects	<p>To support a robust assessment of likely significant effects, the Proposed Development should be illustrated using plans and visualisations which highlight the elements of the Proposed Development which would impact on landscape character and be visually prominent to visual and amenity receptors (for example the new bypass, structures, bridges, cuttings and embankments). Cross sections and photomontages should be included for this purpose.</p> <p>The landscape and visual assessment</p>

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			should reflect any parameters within the dDCO and if necessary the assessment should be undertaken based on the worst case scenario, for example during the interim period where the new Skippool Bridge has been constructed but the existing bridge has not yet been demolished.
5	10.7.4	Mitigation	<p>New tree and shrub planting is proposed, which would form part of an Environmental Masterplan. The Applicant should discuss and agree the planting specification/species mix with the relevant local planning authorities. An appropriate aftercare period for the proposed landscaping should also be agreed.</p> <p>It should be clear how the proposed landscaping would mitigate the impacts on landscape and visual receptors, and how these impacts would change as the proposed planting matures. Interactions with other ES aspects, for example beneficial impacts on local ecology, should be explained.</p>
6	n/a	Design	The ES should provide details of the design and materials of the new structures (identified in Table 2-3). It should be explained how the design and materials have been selected with the aim of minimising the potential landscape and visual impacts.
7	n/a	Potential effects	If the land bridge option (as described in paragraph 2.7.2 of the Scoping Report) is pursued, the ES assessment should assess both positive and negative impacts associated.

4.7 Noise and Vibration

(Scoping Report Section 11)

The proposed study area for construction noise is up to 300m from the Proposed Development boundary. The study area for the construction vehicle assessment is up to 300m from any road route experiencing an increase of noise greater than 1dB. For the operational assessment, DMRB Volume 11 Section 3 Part 7 HD213/11 'Noise and vibration' is to be followed. Other major traffic routes will be taken into account and Noise Important Areas (NIAs) will be included in the assessment.

The Scoping Report notes that a detailed assessment will be undertaken. The construction assessment will be based on BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites' and BS 5228-2:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites'.

The operational road traffic noise assessment will be a detailed assessment and will be undertaken in line with the Department of the Environment and the Welsh Office CRTN: 1988. Three-dimensional noise mapping will be undertaken. DMRB HD213/11 will be used to assess operational road traffic noise.

During construction, noise impacts would arise from construction plant and HGV movements to and from the site; vibration would result from piling.

During operation, potential effects on sensitive receptors are identified as a result of from increased road traffic noise. Noise levels could be affected by changes in vehicle flow, speed and composition as a result of the Proposed Development.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	11.10.4	Ground borne vibration from road traffic	The Scoping Report does not provide sufficient justification to support ground-borne vibration from road traffic being scoped out of the ES. In particular, the Inspectorate considers that ground-borne vibration from road traffic associated with the Proposed Development has the potential to impact on existing residential receptors in proximity to the application site. The ES should either include evidence that ground-borne vibration from road traffic would not result in significant effects on sensitive receptors or provide an assessment.
	Para	Other points	Inspectorate's comments
2	11.2.2	Methodology	The Scoping Report does not set out how sensitive receptors will be identified. This

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			<p>should be clearly explained in the ES.</p> <p>The Applicant should seek to obtain agreement of the assessment methodology with the relevant local planning authorities as stated in DMRB.</p>
3	11.2.1	Study area	<p>The study area used to identify the sensitive receptors should be determined on the basis of the extent of the likely impacts rather than set distances, which may result in receptors being omitted from consideration in the assessment.</p>
4	11.2.6; 11.5.3	NIAAs	<p>The Scoping Report states only those NIAAs within the DMRB defined study area would be included in the assessment and identifies NIAAs 'relevant' to the assessment on Figure 11.1. The Inspectorate considers that any NIAAs likely to experience impacts from construction or operation of the Proposed Development should be included in the ES assessment.</p> <p>The design and mitigation measures which are incorporated into the Proposed Development in relation to the NIAAs should be clearly set out in the ES.</p>
5	11.5.2	Baseline	<p>To provide confidence that the ES assessment is supported by adequate baseline data, the ES should clearly set out the sources of the information reviewed as part of the desk top study.</p>
6	11.5.5	Baseline	<p>The Scoping Report does not outline any site surveys which will be undertaken to determine the baseline conditions. Table 11-1 and paragraph 11.5.7 of the Scoping Report note that this matter will be discussed with the local planning authorities, but no specific details are provided.</p> <p>The ES should identify the locations where monitoring has been undertaken, explain how these locations were selected, confirm when this monitoring was undertaken and the time period covered. The Inspectorate would expect these details to have been discussed and agreed with the relevant local authority planning authorities. The ES should include a justification to support the extent of the survey effort.</p>

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7	11.6.1	Sensitive receptors	The Inspectorate considers that relevant community facilities should be regarded as sensitive receptors for assessment during both construction and operational activities. In particular the Inspectorate requires that impacts to Poulton New Cemetery should be assessed. This approach accords with that described in DMRB Volume 11, Section 2, Part 8.
8	11.6.6	Significant Observed Adverse Effect Level (SOAEL) and Lowest Observed Adverse Effect Level (LOAEL).	Reference is made to both SOAEL and LOAEL. Consistent with the Noise Policy Statement for England, LOAEL and SOAEL should be defined for all of the construction and operational noise and vibration matters assessed (eg airborne noise, groundborne vibration etc). Mitigation measures should be set out accordingly.
9	11.7.4	Potential effects	The Scoping Report does not identify the anticipated construction working hours. The ES should provide details of the anticipated working hours (including any night time working required) and incorporate this into the assessment of likely significant effects. This should be consistent with the working hours specified in the dDCO.
10	11-7.1 - 11.7.4	Potential effects	Noise impacts associated with works at the borrow pits should be assessed in the ES.
11	11.10.1	Assumptions and limitations	The ES should clearly explain any assumptions made and relevant to the assessment, particularly those that relate to the traffic model and the inclusion of committed developments.
12	n/a	Methodology	The noise and vibration chapter of the Scoping Report does not make any reference to the 'land bridge' and how the impacts associated with the structure will be assessed. If the land bridge option is carried forward, the impacts associated with construction and operation should be assessed in the ES.
13	n/a	Monitoring	The Scoping Report does not reference the need for monitoring of noise during construction or operation to ensure the appropriateness of mitigation. The need for and scope of monitoring during construction and operation of the Proposed Development

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			should be agreed with relevant consultees and presented in the ES along with a clear statement explaining how it is secured (if it is necessary).
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4.8 People and Communities

(Scoping Report Section 12)

The proposed study area varies depending on the receptor being considered, as explained in Section 12.2 of the Scoping Report.

The assessment methodology will follow the updated DMRB topic structure contained within IAN 125/15¹³, which combines the published guidance within DMRB Volume 11 – Section 3, Part 6 (Land Use); Section 3, Part 8 (Pedestrians, Cyclists, Equestrians and Community Effects) and Section 3, Part 9 (Vehicle Travellers) into one chapter – ‘People and Communities’.

The Scoping Report considers the potential impacts from construction and operation of the Proposed Development on:

- Land use – private property and associated land-take, community land, development land and agricultural land;
- Journey length, travel patterns, pedestrian/cyclist/equestrian amenity;
- New severance and relief from existing severance; and
- Vehicle travellers – views from the road; driver stress.

ID	Para	Applicant’s proposed matters to scope out	Inspectorate’s comments
1	n/a	Land use – operational phase	The Inspectorate notes that in Section 12.7 of the Scoping Report, ‘Land Use – Operation Phase’ has not been identified as a potential impact. The Inspectorate considers there is potential for agricultural operations to be disrupted due to land take or severance of land parcels. In the absence of evidence to demonstrate that operation of the Proposed Development would not result in significant effects on agricultural operations, the Inspectorate considers that this matter should be assessed in the ES.
	Para	Other points	Inspectorate’s comments
2	12.2.1-5	Study area	The ES should include a clear justification in support of the study areas and ensure they are depicted on corresponding figures to aid understanding. The Inspectorate notes that DMRB Volume

¹³ IAN 125/15 ‘Environmental Assessment Update’

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			11, Section 3, Part 8, Para 2.2, states that community facilities 'and their catchment areas' should be addressed by the assessment. The ES should clearly explain how this requirement has been taken into account in the selection of appropriate study areas.
3	12.5.8	Baseline information	The Inspectorate notes that Wyre Way Recreational Route provides access to Wyre Estuary Country Park. The Country Park should be identified as a community facility for the purposes of the ES assessment.
4	Table 12-1	Value of receptors	The Inspectorate notes from Table 12-1 that PRoW have been valued as 'low' and National and Regional recreational routes have been valued as 'medium'. Given the important recreational function of such routes, the Inspectorate considers that these receptors may have been undervalued. The ES should justify the value afforded to each given receptor.
5	Table 12-1	Value of receptors	The Inspectorate notes from Table 12-1 that Grade 1 agricultural land has been valued as 'high', and Grades 2 and 3a agricultural land have been valued as 'medium'. With Grades 1, 2 and 3a all defined as the 'best and most versatile agricultural land (BMV)', the Inspectorate considers that all BMV agricultural land should be valued as 'high'.
6	12.5.4; 12.5.13 ;12.7.4	Baseline information and potential impacts	Agricultural land classification (ALC) surveys are proposed, which would follow the Ministry of Agriculture, Fisheries and Food (MAFF) guidelines ¹⁴ . The Inspectorate advises that the guidance within Natural England's TIN049 ¹⁵ should also be followed. The ES should quantify the agricultural land which would be temporarily and permanently lost as a result of the Proposed Development (by ALC grade) and assess any impacts that may result in likely

¹⁴ Agricultural Land Classification of England and Wales: revised guidelines and criteria for grading the quality of agricultural land (MAFF, 1988):

¹⁵ Natural England Technical Information Note TIN049: Agricultural Land Classification: protecting the best and most versatile agricultural land (2012)

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			significant effects.
7	12.7.5-6	Impacts	<p>The Scoping Report notes that temporary diversions of non-motorised user (NMU) routes and PRow would be put in place.</p> <p>It should be clear in the ES how long these temporary diversions are anticipated to be in place and how provision of the diversions would be secured through the DCO or other mechanism.</p>
8	12.10.1	Assumptions and Limitations	<p>The ES should explain any assumptions used to underpin the People and Communities assessment including those that relate to the traffic model and the inclusion of committed developments.</p>
9	Figure 12.1	Figures	<p>Figure 12.1 usefully illustrates footpaths and bridleways in the vicinity of the Proposed Development. A similar figure should be provided within the ES, with the footpaths/bridleways labelled on the figure (e.g. 'FP 2') to allow for cross-reference with the main text of the ES.</p>
10	n/a	Impacts on tourism	<p>The Inspectorate notes the presence of three caravan parks within 500m of the application site. The Scoping Report does not set out if/how potential impacts on tourism would be assessed in the ES.</p> <p>The Inspectorate considers that construction of the Proposed Development could present impacts on tourism (and therefore tourism revenue) in the local area. Impacts on tourism should be assessed in the ES. The assessment should include an explanation of how an appropriate study area has been selected.</p>

4.9 Road Drainage and the Water Environment

(Scoping Report Section 13)

Section 13.2 of the Scoping Report proposes a study area comprising a 500m buffer either side of the proposed route. This is stated to be in line with guidance in Volume 11 of the DMRB and IAN 125/15. There are a number of watercourses and field drains within the study area, including several stretches of main river (the tidal River Wyre, the Main Dyke and the Horsebridge Dyke). Figure 13.1 in the Scoping Report is difficult to interpret but appears to show much of the route lying within Flood Zone 3. Paragraph 13.5.15 states that the study area lies within the Lower Wyre sub-area of the Wyre Catchment Flood Management Plan. The area is underlain by a 'secondary B' aquifer; no licensed abstractions or groundwater Source Protection Zones have been identified within the study area.

Section 13.9 of the Scoping Report outlines the methods that will be used to carry out the assessment, including the approach to determining the significance of effects. The assessment will be based on guidance in the DMRB and Defra/EA Groundwater protection position statements and 'various CIRIA publications'.

Section 13.7 of the Scoping Report describes the likely operational impacts of the Proposed Development. Impacts associated with construction on water quality and the flow conveyance attributes of surface water bodies are not described on the grounds that a CEMP will be put in place which will avoid impacts on these aspects of the environment. Localised potential impacts on groundwater levels and flow paths are identified if dewatering is required.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	Table 6-1	Adverse effects on the water quality and flow conveyance attributes of surface water as a CEMP will be adopted that will document 'best practice pollution prevention measures and construction site drainage management proposals'.	As the information provided in the Scoping Report provides limited information on the receptors that could be impacted, the likely nature of the impacts and the degree of confidence in the mitigation measures proposed, the Inspectorate does not agree to this aspect being scoped out. The ES should clearly assess the impacts that could occur and how the proposed mitigation would avoid/prevent significant effects.
	Para	Other points	Inspectorate's comments
2	2.5.3 & 2.5.10	Works to Skippool Bridge	The Environment Agency has highlighted the need to ensure that the flow capacity beneath the new bridge will be maintained and requested confirmation of the proposed location of the road in relation to the relevant Flood Zone. The Inspectorate

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			agrees that these points must be addressed by the description of the proposed development in the ES and taken into account in the aspect assessment.
3	2.6.1	Earthworks design	Paragraph 2.6.1 states that in order to remain at grade the route will need to go into cutting or require fill (Table 2-1 lists the location of the embankments and cuttings and their maximum height). Paragraph 2.6.4 states that parts of the embankment would be constructed with granular material. The ES (or any Flood Risk Assessment (FRA) which provides supporting evidence) should demonstrate what effects the presence of the cuttings and embankments would have on the flow and storage of flood water within the floodplain. The effects of any haul routes should also be considered. The EA has also advised that these points should be covered in the ES (see their scoping consultation response in Appendix 2).
4	2.8.1	Scheme design	The Scoping Report states that only the principle of the drainage design has been decided so far. The Inspectorate considers that the drainage design should be sufficiently developed at the point of application to support a robust assessment of likely significant effects. The Applicant should discuss and agree the details of the drainage system with relevant consultees.
5	13.2.1	Study area	The Scoping Report states that the proposed study area (a 500m buffer either side of the proposed route) is sufficient to capture all potentially affected water resources but does not provide reasons to support this statement. The ES should provide a clear justification as to why the proposed buffer zone is sufficient to capture the zone of influence of the Proposed Development on the water environment.
6	13.4; Table 13-1	Consultation undertaken	The list of consultees in Table 13-1 of the Scoping Report does not include the Marine Management Organisation (MMO). As the River Wyre is tidal and the red line boundary appears to extend below mean high water to the north of Bankfield Farm, the Inspectorate advises that the MMO

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			should be consulted.
7	13.5.19	Flood modelling	Modelling used to inform the assessment in the ES should be agreed with the EA and the Lead Local Flood Authority. The FRA must demonstrate that the Proposed Development would not lead to increased flood risk elsewhere and that floodplain connectivity is maintained during construction and operation.
8	13.8.2	Water Framework Directive (WFD)	The ES should explain the relationship between the Proposed Development and any relevant water bodies in relation to the current relevant River Basin Management Plan (RBMP), in this case the North West RBMP. If the Proposed Development has the potential to impact upon any WFD water bodies these should be assessed. Impacts during construction and operation, as well as any maintenance activities, should be assessed. The Applicant's attention is drawn to the Inspectorate's Advice Note Eighteen: The WFD.
9	13.9.2	Guidance	The Scoping Report states that reference will be made to Defra/EA Groundwater protection position statements and 'various CIRIA publications'. The ES should clearly identify all the guidance that has been relied on in the assessment of effects.
10	13.7.5	Potential mitigation measures	One of the potential measures referred to is the provision of storage to attenuate rates of discharge from the Proposed Development when it is operating. Paragraph 2.8.3 of the Scoping Report states that a number of highway wetland areas would be constructed to provide storage of run-off which would then be discharged into adjoining watercourses. However the advice from the Environment Agency (see Appendix 2) is that any storage ponds cannot be located within Flood Zone 3 as they may already be full when storage is required. The ES should identify the location and size of any storage ponds in relation to Flood Zone 3. It should also clearly evaluate their effectiveness as mitigation measures.

4.10 Geology and Contaminated Land

(Scoping Report Section 14)

The proposed study area comprises a 50m corridor either side of the Proposed Development. This has been extended to 1km for the identification of Environment Agency registered waste sites, abstraction points and geological features.

Table 6-1 of the Scoping Report states that a simple assessment of Geology and Land Contamination is proposed, covering construction phase impacts only. The proposed methodology will utilise the Environment Agency’s Model Procedures for the Management of Land Contamination¹⁶, the Suitable 4 Use Levels for Human Health Risk Assessment¹⁷ and the Construction Industry Research and Information Association (CIRIA)¹⁸. The criteria for determining the sensitivity of receptors and the magnitude of impact are outlined in Tables 14-4, 14-5 and 14-6 of the Scoping Report.

Potential impacts from the Proposed Development include the contamination of soils and groundwater due to spillages/ leakages, creation of new contamination pathways and the contamination of soils. No significant operational effects are anticipated.

ID	Para	Applicant’s proposed matters to scope out	Inspectorate’s comments
1	14.6.3	Construction and Maintenance Workers	The Scoping Report explains that construction and maintenance workers have not been considered as receptors, as they are governed by other Health and Safety legislation. The Inspectorate considers that there is insufficient evidence at this stage to confirm that there would not be significant effects on the health of construction/maintenance workers. Therefore, the Inspectorate does not agree that this matter can be scoped out and considers that construction/maintenance workers should be assessed as receptors in the ES. The Inspectorate notes paragraph 4.81 of the NPSNN in this regard.

¹⁶ Environment Agency (2004) Model Procedures for the Management of Land Contamination, Contaminated Land Report 11 (CLR11)

¹⁷ Nathanail C.P *et al* (2015) The LQM/CIEH Suitable 4 Use Levels for Human Health Risk Assessment

¹⁸ CIRIA (2001) Contaminated land risk assessment. A guide to good practice (C552)

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2	14.8.2	Impacts on geology	<p>The Inspectorate agrees that an assessment of effects on Regionally Important Geology Sites (RIGS) and geological SSSIs can be scoped out on the basis that none are located within the study area.</p> <p>The Inspectorate notes from Table 14-1 that Local Geological Groups would be consulted to obtain information about local geological resources/features. If any impacts on local geological resources/features could occur as a result of construction or operation of the Proposed Development, the likely significant effects on these should be assessed in the ES.</p>
3	14.8.3	All operational impacts	<p>Table 6-1 and paragraph 14.8.3 of the Scoping Report propose to scope out an assessment of operational impacts relevant to Geology and Contaminated Land from the ES. The Inspectorate notes paragraph 14.9.4 of the Scoping Report, which states that the '<i>operation period would be assessed</i>', which appears to contradict Table 6-1 and paragraph 14.8.3. The Inspectorate's opinion on this matter has been based on the request in Table 6-1 and paragraph 14.8.3 to scope all operational impacts out of the ES.</p> <p>The Scoping Report explains that potential operational impacts (primarily contaminated land and effects on hydrogeology) would be addressed via mitigation measures designed and implemented during the construction phase. Subject to suitable mitigation measures being demonstrably delivered and secured through the CEMP (or other legal mechanism), the Inspectorate agrees that significant effects during operation are unlikely to occur and that this matter can be scoped out of the assessment.</p>
	Para	Other points	Inspectorate's comments
4	1.1.2 [sic] 14.1.3	Introduction	<p>The Inspectorate notes from the introductory section of the Geology and Contaminated Land chapter of the Scoping Report that soils are not covered in this chapter. This approach differs from the aspect 'Geology and Soils' specified in DMRB Volume 11.</p> <p>The Scoping Report explains that impacts</p>

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			<p>to soils are instead to be assessed in 'People and Communities'. However, the Inspectorate notes that the Geology and Contaminated Land chapter does contain reference to impacts on soils, so this is less than clear.</p> <p>The ES should provide an assessment of impacts to soils and where necessary cross refer to other aspect assessments within the ES.</p>
5	14.2.1	Study area	<p>The Scoping Report justifies the use of a 50m study area, but the reasons for selection of the 1km study area for identification of Environment Agency registered waste sites, abstraction points and geological features are not explained. The selection of the study area should be established in accordance with the extent of the impacts, agreed with relevant consultees and justified in the ES. The study areas and identified features should be shown on a figure accompanying the ES.</p>
6	14.5.3	Ground investigation and land stability assessment	<p>The Scoping Report states that a ground investigation and land stability assessment would be undertaken to inform the design of the Proposed Development. It appears that the ground investigation may not be completed prior to construction as the Scoping Report states 'this would be investigated at a later stage of the Scheme Design'. The Applicant should ensure that sufficient data is obtained to inform the design of the Proposed Development and to enable a robust assessment of the impacts necessary to identify likely significant effects, as well as to allow for appropriate mitigation methods (if required) to be defined.</p> <p>It is recommended that the scope of the required ground investigation works is agreed with relevant consultees, including the local planning authorities and the Environment Agency.</p>
7	14.7.4	Potential effects	<p>The Scoping Report explains that dewatering may be required during construction, which could lead to the migration of contamination across a 'wider area'. The ES should confirm the area over which impacts may occur and provide a</p>

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			robust assessment of the impacts.
8	n/a	Potential effects	The ES should assess any impacts/risks to and from the Proposed Development in relation to the historic landfill sites in proximity to the application site.

4.11 Materials

(Scoping Report Section 15)

A specific study area has not been defined for the materials assessment and therefore a whole market approach (UK wide) would be used to procure materials for the Proposed Development. For the waste assessment, the study area is the administrative boundaries of Lancashire and Greater Manchester. During operation, it is anticipated that only minor quantities of waste would be produced.

A specific assessment methodology has not been referenced in this section of the Scoping Report.

During construction, the potential effects of the Proposed Development are associated with the production, movement, transport, processing and disposal of waste from the application site. Effects would also arise from the occupation of waste management facility space, permanent reduction in landfill capacity and transport of materials and waste. No significant effects are predicted and it is proposed that a materials assessment (at all phases of the development) is scoped out of the EIA.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	n/a	Potential impacts - construction	<p>The Applicant proposes to scope out the aspect materials from the ES. It is proposed that information regarding waste and materials during construction would instead be included in the Project Description section of the ES.</p> <p>The Proposed Development is a nationally significant infrastructure project and construction would require the use of large amounts of materials and would generate waste that would need to be reused, recycled or disposed of. Large amounts of earth would be moved during construction and borrow pits and imported granular material would be used to supplement the fill requirement. The Inspectorate considers that particular elements of the construction works will have impacts with the potential to generate significant effects in terms of materials and waste, including:</p> <ul style="list-style-type: none"> • Waste generated by demolition of the existing Skippool Bridge; • Use of borrow pits and soil stockpiles;

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			<ul style="list-style-type: none"> • Import of granular material for construction of the embankment between Skippool Bridge Junction and Poulton Junction; • Materials required for construction of the land bridge (if this option is taken forward); and • Potential presence of contaminated soils and asbestos on the site and associated impacts on human health; removal and disposal of this material. <p>The Inspectorate therefore considers that an assessment of the likely significant effects associated with these impacts should be included in the ES. The type and quantities of materials proposed to be used, the sources/types of waste and suitable disposal sites should be clearly identified within the assessment.</p>
2	n/a	Potential impacts-operation	During operation of the Proposed Development, it is anticipated that only minor quantities of resources would be used, and minor quantities of waste produced. The Inspectorate agrees that significant effects are unlikely to occur and that this matter can be scoped out of the assessment.
	Para	Other points	Inspectorate's comments
3	2.17.1	Mitigation	The Inspectorate welcomes that a Site Waste Management Plan and a Materials Management Plan would be prepared. The Applicant is advised that a Soils Management Plan should also be prepared, to set out how potential impacts on soil quality would be minimised in accordance with the NPSNN. Drafts of these documents should be appended to the ES and their relationships with the assessment of likely significant effects should be explained.
4	15.9.1	Assumptions and Limitations	The Inspectorate notes various assumptions and limitations relevant to the materials assessment (for example at paragraphs 15.5.2; 15.5.4 and 15.5.8), although these are not reflected in paragraph 15.9.1 of the Scoping Report. All assumptions and limitations relevant to the Materials assessment should be clearly

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			set out in the ES.
5	n/a	Guidance	The guidance followed should be detailed in the ES assessment, including how significance of effects has been determined.

4.12 Climate

(Scoping Report Section 16)

The proposed climate assessment considers climate resilience and adaptation in the context of the north west region and greenhouse gas (GHG) effects based on the extent of the traffic model for the Proposed Development.

GHG emissions from construction are proposed to be calculated using a methodology consistent with PAS2080:2016 Carbon Management in Infrastructure and applying professional judgement. No specific methodology is stated in relation to climate change adaption and resilience, although the requirements of the NPSNN and the DEFRA Climate Change Risk Assessment process are referenced and the Applicant proposes to consider the UK Climate Projection 2009 (UKCP09) high emissions scenario against the 2080 projections at the 50% probability level. Transport related GHG emissions are proposed to be calculated using WebTAG.

A number of potential construction and operation adaptation effects are identified but their significance is not assessed at this stage. The construction and operation of the Proposed Development is predicted to give rise to GHG emissions.

The Applicant's GHG assessment methodology proposes to scope out consideration of embedded carbon due to product manufacture, desk based studies and transport of construction plant and equipment to site; assessment of operational water use and processes; and post-operational effects.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	Table 16.5	Product manufacturing, preliminary desk studies and transport of construction plant and equipment to site	The proposed scope out of product manufacturing and transport of plant and equipment to site appears to contradict the assessment methodology set out in paragraph 16.9.13 of the Scoping Report, which states that the assessment will consider embodied CO ₂ equivalent emissions (CO ₂ e).The Inspectorate considers that these matters are already in the proposed scope of the ES and should be assessed.
2	Table 16.5	Operational water use	Considering the nature of the scheme, the Inspectorate considers that significant effects in respect to GHG emissions are unlikely to occur from operational water use. This matter can be scoped out from further assessment.
3	Table	Other operational	The Applicant proposes to scope out 'other

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	16.5	processes	operational processes' but does not define what the other processes are (except for management of operational waste). Based on the current level of detail, the Inspectorate does not consider that it has sufficient information to understand what the other processes are and therefore whether it is appropriate to scope them out or not. The Inspectorate considers that this matter cannot be scoped out without further justification.
4	Table 16.5	Post-operational effects	The Applicant proposes to scope out an assessment of GHG emissions associated with post-operation effects (e.g. deconstruction, demolition and decommissioning). On the basis that road schemes are intended to be permanent infrastructure and that effects associated with replacement of the proposed road (such as resurfacing) would be addressed under the assessment of operational effects, the Inspectorate considers that significant effects are unlikely to occur. The Inspectorate agrees that this matter can be scoped out from further assessment.
	Para	Other points	Inspectorate's comments
5	16.3.1	UKCP09 projections	As set out in the NPSNN the assessment of potential impacts of climate change should use the latest UK Climate Projections, this should include the anticipated UKCP18 projections where appropriate.
6	16.8.1	Numerically quantified or employ a qualitative judgement	The Scoping Report states that impacts on receptors would be 'numerically quantified or employ a qualitative judgement'. The Inspectorate considers that this wording introduces uncertainty regarding the final assessment method. The Applicant should assess climate change adaptation effects qualitatively and GHG emissions quantitatively. Any use of professional judgement to assess significance should be fully justified within the Applicant's ES.
7	16.9.15	GHG emissions coefficients	Coefficients used to calculate GHG emissions should be set out in the ES and fully justified.
8	16.9.18	Carbon sequestration	The Applicant should set out how variations

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			in the sequestration capability of landscape planting as it matures will be taken into account in the assessment.
9	16.9.19 -20	No recognised significance criteria	The Scoping Report states that there are no significance criteria for climate change adaptation or GHG emissions. Whilst the Inspectorate considers that climate change adaptation effects may be assessed at an aspect level, it considers that the Applicant must set out its basis for assessment of significant GHG emissions (e.g. is this based on comparison with regional or national carbon budgets) as identified in paragraph 16.3.1 bullet point 7.

4.13 Cumulative Effects

(Scoping Report Section 17)

'Zones of Influence' (ZoI) have been used to identify 'other developments' for inclusion in the Cumulative Effects Assessment (CEA), as detailed in Table 17-1 of the Scoping Report. The list of other developments (Table D1 and Figure 17.1 of the Scoping Report) would be reviewed periodically to ensure that the most up to date information is utilised in the assessment.

The Scoping Report proposes to assess:

- Intra-scheme effects: the combined effects on a receptor from the Proposed Development; and
- Inter-scheme effects: cumulative effects on a receptor from different projects.

The assessment would cover both construction and operation of the Proposed Development and would follow the guidance in the Planning Inspectorate's Advice Note Seventeen: Cumulative Effects Assessment.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
	n/a	None identified	n/a
	Para	Other points	Inspectorate's comments
1	17.2.4	Inter-scheme effects	The relationship between the other developments identified and considered in the CEA and the 'local developments' (as referenced in paragraph 2.18.14 of the Scoping Report) which have been built into the traffic modelling should be clearly explained in the ES.
2	Table 17-1	ZoI for environmental topics	The Inspectorate advises that the ZoI for each environmental aspect should be defined in the ES with reference to the extent of the likely impact and the sensitivity of the relevant receptors. If reference is made to the traffic modelling when defining the ZoI, it should be clear whether this relates to the fully modelled area or the area of detailed modelling. The list of 'other developments' (Table D1 of the Scoping Report) may need to be reviewed accordingly.
3	17.2.8	Method	The Inspectorate advises that the sources of information utilised in the desk study for

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			the assessment are clearly stated in the ES.
4	17.2.11	Method	The Inspectorate notes that the proposed exclusion/inclusion criteria to identify the shortlist of 'other development', has not been presented within the Scoping Report. The ES should present the proposed exclusion/inclusion criteria and provide justification for the decision to exclude any 'other development' from further assessment.

5. INFORMATION SOURCES

5.0.1 The Inspectorate's National Infrastructure Planning website includes links to a range of advice regarding the making of applications and environmental procedures, these include:

- Pre-application prospectus¹⁹
- Planning Inspectorate advice notes²⁰:
 - Advice Note Three: EIA Notification and Consultation;
 - Advice Note Four: Section 52: Obtaining information about interests in land (Planning Act 2008);
 - Advice Note Five: Section 53: Rights of Entry (Planning Act 2008);
 - Advice Note Seven: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping;
 - Advice Note Nine: Using the 'Rochdale Envelope';
 - Advice Note Ten: Habitats Regulations Assessment relevant to nationally significant infrastructure projects (includes discussion of Evidence Plan process);
 - Advice Note Twelve: Transboundary Impacts
 - Advice Note Seventeen: Cumulative Effects Assessment; and
 - Advice Note Eighteen: The Water Framework Directive.

5.0.2 Applicants are also advised to review the list of information required to be submitted within an application for Development as set out in The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (as amended).

¹⁹ The Planning Inspectorate's pre-application services for applicants. Available from: <https://infrastructure.planninginspectorate.gov.uk/application-process/pre-application-service-for-applicants/>

²⁰ The Planning Inspectorate's series of advice notes in relation to the Planning Act 2008 process. Available from: <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES²¹

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Health and Safety Executive	Health and Safety Executive
The National Health Service Commissioning Board	NHS England
The relevant Clinical Commissioning Group	NHS Fylde & Wyre Clinical Commissioning Group
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England - North West
The relevant fire and rescue authority	Lancashire Fire and Rescue Service
The relevant police and crime commissioner	Lancashire Police and Crime Commissioner
The relevant parish council(s) or, where the application relates to land [in] Wales or Scotland, the relevant community council	Little Eccleston-with-Larbreck Parish Council
	Singleton Parish Council
The Environment Agency	The Environment Agency - Cumbria and Lancashire
The Maritime and Coastguard Agency	Maritime & Coastguard Agency
The Maritime and Coastguard Agency - Regional Office	The Maritime and Coastguard Agency - Fylde and Lytham
The Marine Management Organisation	Marine Management Organisation (MMO)
The Civil Aviation Authority	Civil Aviation Authority
The Relevant Highways Authority	Lancashire County Council
The relevant strategic highways company	Highways England - North West
Trinity House	Trinity House
Public Health England, an executive agency of the Department of Health	Public Health England
The Crown Estate Commissioners	The Crown Estate
The Forestry Commission	Forestry Commission - North West and West Midlands
The Secretary of State for Defence	Ministry of Defence

²¹ Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations')

TABLE A2: RELEVANT STATUTORY UNDERTAKERS²²

STATUTORY UNDERTAKER	ORGANISATION
The relevant Clinical Commissioning Group	NHS Fylde & Wyre Clinical Commissioning Group
The National Health Service Commissioning Board	NHS England
The relevant NHS Trust	North West Ambulance Service NHS Trust
Railways	Highways England Historical Railways Estate
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes and Communities Agency
The relevant Environment Agency	Environment Agency - Cumbria and Lancashire
The relevant water and sewage undertaker	United Utilities
The relevant public gas transporter	Cadent Gas Limited
	Energetics Gas Limited
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Connections Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Quadrant Pipelines Limited
	National Grid Gas Plc
	Scotland Gas Networks Plc
Southern Gas Networks Plc	
Wales and West Utilities Ltd	
The relevant electricity distributor with CPO Powers	Energetics Electricity Limited
	Energy Assets Power Networks
	ESP Electricity Limited
	G2 Energy IDNO Limited
	Harlaxton Energy Networks Limited
	Independent Power Networks Limited
Leep Electricity Networks Limited	

²² 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (as amended)

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STATUTORY UNDERTAKER	ORGANISATION
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Utility Distribution Networks Limited
	Electricity North West Limited
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc

TABLE A3: SECTION 43 CONSULTEES (FOR THE PURPOSES OF SECTION 42(1)(B))²³

LOCAL AUTHORITY²⁴
Fylde Borough Council
Wyre Council
Lancashire County Council
Lancaster City Council
South Ribble Borough Council
Ribble Valley Borough Council
Preston City Council
West Lancashire Borough Council
Blackpool Council
Yorkshire Dales National Park Authority
Knowsley Council
Rochdale Borough Council
Sefton Metropolitan Borough Council
St. Helens Metropolitan Borough Council
Wigan Council
Bolton City Council
Bradford Metropolitan District Council
Bury Council
Calderdale Council
Blackburn with Darwen Council
North Yorkshire County Council
Cumbria County

²³ Sections 43 and 42(B) of the PA2008

²⁴ As defined in Section 43(3) of the PA2008

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

Consultation bodies who replied by the statutory deadline:

Cadent Gas Limited
The Environment Agency - Cumbria and Lancashire
ESP Gas Group Ltd
The Health and Safety Executive
Lancaster City Council
National Grid Gas Plc and National Grid Electricity Transmission Plc
NATS En-Route Safeguarding
Natural England
Preston City Council
Public Health England
Royal Mail
Sefton Metropolitan Borough Council
Singleton Parish Council
St Helens Metropolitan Borough Council
Wales & West Utilities Ltd
West Lancashire Borough Council
Yorkshire Dales National Park Authority

From: [Iain Long](#)
To: [A585 Windy Harbour to Skippool](#)
Subject: A585WindyHarbourtoSkipool - Cadent Gas
Date: 24 November 2017 16:59:01
Attachments: [Response to s.42 and plan.pdf](#)

For the attention of Emma Cottam,

Dear Emma

Fisher German LLP have been instructed by Cadent Gas Ltd in respect of the A585 Windy Harbour

Cadent will have infrastructure affected by your proposals. Please can you confirm if you have already received this asset location information, or if you have requested it. We can provide plans if required.

Please can you ensure future correspondence regarding Cadent is issued to my details below at Fisher German, The Estates Office, Norman Court, Ashby De la Zouch, Leics, LE65 2UZ

If you require anything else from Cadent in the meantime please let me know.

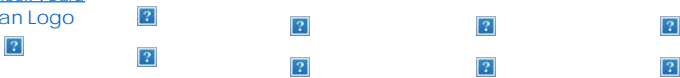
Kind regards

Iain Long MRICS FAAV

For and on behalf of Fisher German LLP
01530 410825
07587 033058

[Download Outlook vCard](#)

[Fisher German Logo](#)

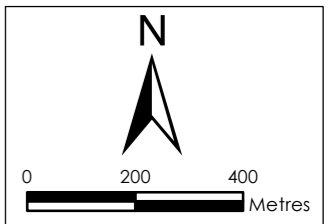


The Estates Office - Norman Court - Ivanhoe Business Park - Ashby de la Zouch - Leicestershire - LE65 2UZ



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LEGEND:

- LP Pipeline
- MP Pipeline
- IP Pipeline
- HP Pipeline
- Boundary

REVISION: A

CLIENT: **Cadent**
Your Gas Network

SCHEME: A585 WINDY HARBOUR

TITLE: INTERACTION PLAN

SCALE: 1:14,000 @ A3
DATE: 22/11/2017

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FISHER GERMAN
The Estates Office
Norman Court
Ashby de la Zouch,
Leicestershire, LE65 2UZ
Telephone 01530 412821
Fax: 01530 413896

DRAWING NO:
CADENT-WINDY-2017-11-MDA-INT-INTERACTIONPLAN

Ms Emma Cottam - EIA and Land Rights
Advisor – Environmental Services Team
The Planning Inspectorate
Major Casework Directorate
Temple Quay House (2 The Square)
Temple Quay
Bristol
Avon
BS1 6PN

Our ref: NO/2017/110331/01-L01
Your ref: TR010035-000008
Date: 05 December 2017

Dear Ms Cottam

**PLANNING ACT 2008 (AS AMENDED) AND THE INFRASTRUCTURE PLANNING
(ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (THE EIA
REGULATIONS) – REGULATIONS 10 AND 11
APPLICATION BY HIGHWAYS ENGLAND (THE APPLICANT) FOR AN ORDER
GRANTING DEVELOPMENT CONSENT FOR THE A585 WINDY HARBOUR TO
SKIPPOOL IMPROVEMENT SCHEME (THE PROPOSED DEVELOPMENT)
SCOPING CONSULTATION AND NOTIFICATION OF THE APPLICANT'S CONTACT
DETAILS AND DUTY TO MAKE AVAILABLE INFORMATION TO THE APPLICANT
IF REQUESTED**

A585 WINDY HARBOUR TO SKIPPOOL IMPROVEMENT SCHEME

Thank you for consulting us on the above request for an Environmental Impact Assessment (EIA) Scoping Opinion. We would like to make the following comments:-

Environment Agency position

We have reviewed the EIA Scoping Report (Version 4.0; dated November 2017) prepared by Arcadis for Highways England insofar as it relates to our remit, and in general we are satisfied with the scope of the matters to be addressed in the Environmental Statement (ES).

We have some additional comments to make which we hope will assist in ensuring that the ES will appropriately address the environmental issues we consider are of most importance for this proposal. Some points may need clarification and we are happy for the applicant's consultants to discuss these with us.

Flood Risk

The proposed scheme is located within Flood Zone 3 (high probability of flooding) and the proposal is for 'essential infrastructure' development, as defined in the Planning Practice Guidance to the National Planning Policy Framework (NPPF). The Scoping

Environment Agency
Lutra House Walton Summit, Bamber Bridge, Preston, PR5 8BX.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

Report states that a Flood Risk Assessment (FRA) will be produced to inform the ES.

We are generally satisfied with the scope of the ES, however there are some matters which will require further work and clarification as part of the FRA, and Flood Risk Activity Environmental Permit applications. We have provided comments on these matters below.

The FRA should ensure that the correct source of flood risk (i.e. fluvial and/or tidal) for different sections of the proposed road are identified and discussed. The FRA must investigate how the proposed scheme will affect the flow of water in the area, including during a flood whilst taking climate change into account. It must be demonstrated in the FRA that the proposals will not increase flood risk elsewhere, including to the properties downstream of Skippool Bridge, and that floodplain connectivity is maintained both before, during and after completion.

As part of the FRA, any modelling carried out (including depth grids for a full range of appropriate scenarios) must be checked and approved by the Environment Agency before it can be used to support the proposals.

We have provided the applicant's consultant with advice on flood risk through our charged-for planning advice service. To date, we have reviewed the applicant's draft FRA (including FRA addendum) and modelling including tidal locking, and we identified some issues which required further work to demonstrate that the development would not be at an unacceptable risk of flooding or increase flood risk elsewhere. We welcome further opportunity to work with the applicant to ensure any outstanding flood risk matters are addressed.

Section 2.5.3: It is stated that the proposals include the replacement of Skippool Bridge. We will need to ensure that the flow capacity underneath the new bridge is maintained. If the scheme does offer a reduction in flood risk due to Skippool Bridge upsizing, then a Requirement on the subsequent Development Consent Order (DCO) will need to be imposed stating that this bridge must be upsized before any work within the floodplain is carried out.

Section 2.5.10: It is stated that the proposed route south of Skippool Bridge crosses the present floodplain. Confirmation is required as to the proposed location of the road (and associated works) in relation to the flood zone incorporating an appropriate allowance for climate change.

Section 2.6.1: It is stated that there will be areas of cut and fill along the proposed route. Details will need to be provided in relation to the size of these areas and their location in relation to the flood zone and how these areas will affect the flow and storage of flood water within the area. Climate change will need to be taken into account.

Section 2.6.4: It is stated that parts of the embankments between Skippool Bridge Junction and Poulton Junction will have to be constructed from granular materials. Details will need to be provided in relation to how these embankments, and the presence of the granular materials, will affect the flow of flood water.

Section 2.8.3: It is stated that there are 4 proposed highway wetland areas that could be used to provide storage for surface water run-off, and will discharge to the adjoining watercourses. Flood storage ponds cannot be located within the Flood Zone 3 as there is the potential for them to be already full when storage is required. The proposed location of the ponds should be shown in relation to the flood zone, including an

allowance for climate change. The construction of any outfalls into Main River watercourses will require an Environmental Permit. Any outfalls into Ordinary Watercourses will require the consent of the Lancashire County Council, as the Lead Local Flood Authority.

Section 2.13.23: It should be demonstrated that the proposed construction haulage routes will not increase flood risk by adversely affecting the flow of water, including during a flood, in the area over their lifetime.

The latest guidance on how to apply the correct, up to date climate change allowance for FRAs is available on the GOV.UK website at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

Environmental Permitting for Flood Risk Activities

There are several designated Main River watercourses within and adjacent to the proposed Development Consent Order boundary: Horsebridge Dyke, Main Dyke (Skipool Creek) and the River Wyre, which is tidal in this location.

An Environmental Permit for flood risk activities may be required for any development, in, under, over or within 8 metres of the top of the bank of a non-tidal Main River, flood defence structure or culvert. For tidal Main Rivers, an Environmental Permit may be required for development within 16 metres of a river, sea/flood defence structure or culvert. In particular, no trees or shrubs may be planted, nor fences, buildings, pipelines (including outfalls) or any other structure erected without an Environmental Permit. The developer can contact us and refer to the GOV.UK website for further information: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>

The Environment Agency has a right of entry to Horsebridge Dyke, Main Dyke (Skipool Creek) and the River Wyre by virtue of Section 172 of the Water Resources Act 1991, and a right to carry out maintenance and improvement works by virtue of Section 165 of the same Act.

In order to reduce issues in relation to Environmental Permitting, any subsequent detailed plans should clearly map the 8 and 16 metre easements, as applicable, along the length of the Main River watercourse (based on a topographical survey) together with any development indicated within the easement.

Section 2.5.10 to 2.5.11: For the purposes of clarity it should be noted that the Main River under the Skipool Junction roundabout is Horsebridge Dyke

Section 2.13.2 and Section 2.14.3: It is stated that a new/upgraded junction is proposed at Skipool Junction. This junction is located on top of a culverted Main River watercourse (Horsebridge Dyke), which may require rebuilding or strengthening. Any works within 8 metres of the culverted Main River watercourse will require an Environmental Permit. Assurance will be required that the structural integrity will not be adversely affected and that our access to the culvert will not be restricted by any of the proposed works.

Section 2.13.5: It is stated that Skipool Bridge will be replaced. Assurance will be required that the flow capacity, including flood flow at a range of return periods whilst taking climate change into account, is not decreased. Any works within 8 metres of the top of the bank of Main Dyke (Skipool Creek) will require an Environmental Permit.

Section 2.13.20: It should be recognised that if any of the proposed site compounds are adjacent to a Main River watercourse that an Environmental Permit may be required for any works or structures within 8 metres of a non-tidal Main River, or 16 metres of a tidal Main River. The site compounds should be designed as to remain outside our easement. The applicant is encouraged to discuss this with us at their earliest opportunity.

Groundwater and Contaminated Land

We are satisfied that the scope of work outlined in the Scoping Report will be appropriate for the management of the risks to controlled waters.

The Scoping Report identifies several potential sources of contamination that could pose a risk to the water environment. Sensitive controlled waters in this location include the underlying Bedrock which is predominately a Secondary B aquifer overlain by superficial deposits which are Secondary A, Secondary (undifferentiated) and Unproductive strata. There are also numerous watercourses in this location, which include several Main River watercourses identified above.

The ES should assess the impacts the development may have in relation to contamination in this location and detail any required mitigation measures to prevent an adverse impact on the water environment.

A relevant assessment of the groundwater conditions should be made and appropriate measures should be in place to prevent any detrimental impacts on groundwater quality where applicable. Where any potential effects to hydrogeology are identified during the construction and operational stage of the site, suitable mitigation methods must be put in place.

If infiltration methods are used for surface water disposal, such as via sustainable drainage systems, a simple index approach should be used when selecting suitable water quality treatment measures. Guidance can be found in Chapter 26 of the CIRIA SUDS Manual (C753).

We recommend that the developers:

1. Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.
2. Refer to the [Environment Agency Guiding principles for land contamination](#) for the type of information that we required in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
3. Consider using the [National Quality Mark Scheme for Land Contamination Management](#) which involves the use of competent persons to ensure that land contamination risks are appropriately managed.
4. Refer to the [contaminated land](#) pages on GOV.UK for more information.
5. Refer to the [groundwater protection](#) pages on the GOV.UK for more information

Biodiversity

We consider that the Scoping Report is thorough in terms of biodiversity issues and believe it has covered aspects we would like to see included in the ES.

There is the potential for indirect impacts on water-dependent designated sites and

habitats through any pollution entering local watercourses, particularly Main Dyke, (which feeds directly into the Wyre Estuary) both through the schemes construction and once the scheme has been completed, unless adequate pollution prevention measures are put in place.

The Flood Risk Activity Environmental Permit that will be necessary for the new Skippool Bridge (over Main Dyke) should incorporate pollution prevention methods during construction. A buffer zone will be required between any development and Main Dyke to aid the filtration of any pollutants draining off of the new road to avoid the deterioration of the water quality in Main Dyke.

Land alongside watercourses is particularly valuable for wildlife. Retaining and enhancing coherent ecological networks adjacent to watercourses will help to ensure that their biological and chemical quality is not reduced as a result of development, which is a requirement of the Water Framework Directive (WFD), and contribute to green infrastructure networks in the area. The ES should:

- include a detailed ecological survey of any wetland habitats and species, undertaken at an appropriate time of year by a suitably qualified ecologist;
- assess the importance of any wetland features at a local, regional and national level;
- identify the impacts of the scheme on those features;
- demonstrate how the development will avoid adverse impacts;
- propose mitigation for any adverse ecological impacts or compensation for loss and any limitations of this mitigation; and
- propose wildlife habitat enhancement measures

Characteristics of the potential impacts are:

- direct damage to/or loss of aquatic habitat and biodiversity associated with the proposed development;
- direct and indirect impacts on aquatic species (including rare and sensitive) likely or possibly present at the development site; and
- impacts on surface water hydrology and quality

Assessments should have regard to the above and should address the effects that might occur during construction and post construction stages.

Pollution Prevention

We are pleased to see that the EIA will consider the impacts of the proposed development on water quality during the operational phase. We would recommend the use of Sustainable Drainage Systems (SUDS) to absorb diffuse pollutants and improve water quality, thereby contributing to Water Framework Directive (WFD) objectives.

It is stated that pollution prevention associated with the construction phase are to be scoped out of the ES, however we are pleased to see that the ES will include a Construction Environmental Management Plan (CEMP), including a Pollution Prevention Plan, which will prevent any detrimental impacts on water quality.

Appropriate control measures for construction site run-off and sedimentation should be identified to prevent detrimental impacts on nearby watercourses. Any contaminated water should not, unless appropriately permitted under Environmental Permitting Regulations 2016, enter any watercourse.

There should also be a management system for any accidental spills or containment failures which would prevent or reduce any potential impacts on nearby watercourses.

Water Framework Directive (WFD)

We are pleased to see that reference has been made to [WFD](#) and that the applicant intends to seek our advice in relation to a WFD Assessment.

In England compliance with WFD is achieved through meeting the requirements of the relevant River Basin Management Plan (RBMP). The applicant should assess any risk that a proposed development could harm a surface water body or groundwater, during construction and operation, including maintenance arrangements.

With any development alongside watercourses, consideration should be given to the requirements of the WFD. This includes preventing overall deterioration in water quality and promoting improvement in the ecological status of any water body. Actions to achieve this are listed in the [North West river basin district RBMP](#).

A WFD Assessment (<http://planningguidance.communities.gov.uk/blog/guidance/water-supply-wastewater-and-water-quality/water-supply-wastewater-and-water-quality-considerations-for-planning-applications/>) should assess any potential impacts on the watercourse and demonstrate that the required enhancements will be delivered. In some cases the requirements of a WFD assessment can be incorporated into the EIA. Any development that has the potential to cause deterioration in classification under WFD or that precludes the recommended actions from being delivered in the future is likely to be considered unacceptable to us.

Sustainable Drainage Systems (SUDS)

We would recommend the use of SUDS as they can perform multiple benefits, such as reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge, absorbing diffuse pollutants and improving water quality and provide an important contribution to green infrastructure and Water Framework Directive objectives. The variety of SUDS techniques available means that virtually any development should be able to include a scheme based around these principles and provide multiple benefits, reducing costs and maintenance needs.

Any drainage system must not pose a risk to groundwater quality and must not be constructed in ground affected by contamination.

SUDS should always be carefully considered in discussions with the Lead Local Flood Authority.

Further guidance is available in the national Planning Practice Guidance at <https://www.gov.uk/guidance/flood-risk-and-coastal-change#sustainable-drainage-systems>

Further Planning Advice

Should the developer wish for us to review any technical documents or want further advice to address the environmental issues raised, we can do this as part of our charged-for planning advice service.

The developer can request further planning advice from us by submitting a request to clplanning@environment-agency.gov.uk. In their request the developer should specify the additional services that are required from us. We will review their request and provide a written offer based on our planning advice charges of £84 per person per hour. We will not undertake any additional work until an offer has been accepted.

The developer should be aware that our charged advice service is voluntary and that we may be unable to provide charged advice where other operational activities and issues prevent us from doing so.

Yours sincerely

Mr Alex Hazel
Planning Advisor - Sustainable Places

Direct dial: 020 302 51215

Direct e-mail: CLPlanning@environment-agency.gov.uk

From: [ESP Utilities Group Ltd](#)
To: [A585 Windy Harbour to Skippool](#)
Subject: Your Reference: TR010035-000008. Our Reference: PE133402. Plant Not Affected Notice from ES Pipelines
Date: 22 November 2017 14:15:14

A585 Windy Harbour to Skippool
The Planning Inspectorate

22 November 2017

Reference: TR010035-000008

Dear Sir/Madam,

Thank you for your recent plant enquiry at (TR010035-000008).

I can confirm that ESP Gas Group Ltd has no gas or electricity apparatus in the vicinity of this site address and will not be affected by your proposed works.

ESP are continually laying new gas and electricity networks and this notification is valid for 90 days from the date of this letter. If your proposed works start after this period of time, please re-submit your enquiry.

Important Notice

Please be advised that any enquiries for ESP Connections Ltd, formerly known as British Gas Connections Ltd, should be sent directly to us at the address shown above or alternatively you can email us at: PlantResponses@espipelines.com

Yours faithfully,

Alan Slee
Operations Manager



Bluebird House
Mole Business Park
Leatherhead
KT22 7BA

☎ 01372 587500 📠 01372 377996

<http://www.espug.com>

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CEMHD Policy - Land Use Planning
NSIP Consultations
Building 2.2, Redgrave Court
Merton Road, Bootle
Merseyside, L20 7HS

Your ref: TR010035

Our ref: 4.2.1.6169

HSE email: NSIP.applications@hse.gov.uk

FAO Emma Cottam
The Planning Inspectorate
Bristol
BS1 6PN
By e-mail

07/12/17

Dear Ms Cottam

**PROPOSED A585 Windy Harbour to Skippool Improvement Scheme (the project)
PROPOSAL BY HIGHWAYS ENGLAND (the applicant)
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as amended) – Regulations 10 and 11**

Thank you for your letter of 9th November 2017 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's land use planning advice

Will the proposed development fall within any of HSE's consultation distances?

There are currently no major accident hazard sites or pipelines within the development. If in the intervening period we are notified of a change to this situation, the applicant would need to seek advice from us.

Explosives sites

The Explosives Inspectorate has no comment to make as there are no licensed explosives sites in the vicinity.

Waste

In respect of waste management the applicant should take account of and adhere to relevant health and safety requirements. Particular attention should be paid in respect of risks created from historical landfill sites. More details can be found on HSE's website at: <http://www.hse.gov.uk/waste/index.htm>

Electrical Safety

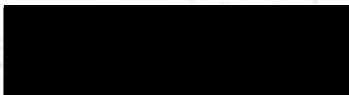
No comment from a planning perspective

Please send any further electronic communication on this project directly to the HSE's designated e-mail account for NSIP applications. Alternatively any hard copy correspondence should be sent to:

Mr Dave Adams (MHPD)
NSIP Consultations
2.2 Redgrave Court
Merton Road, Bootle,

Merseyside L20 7HS

Yours sincerely,
Marion Davies



PP
Dave Adams
(CEMHD4 Policy)

From: Hammond, John [mailto:mhammond@lancaster.gov.uk] **On Behalf Of** developmentcontrol
Sent: 17 November 2017 11:14
To: A585 Windy Harbour to Skippool
Subject: RE: A585 Windy Harbour to Skippool Improvement Scheme - EIA scoping notification and consultation

Good Morning

Further to the email below, the site stated, does not fall within the district of Lancaster City Council but that of Wyre Borough Council. Therefore, we do not see any issues that would affect LCC.

Regards

Development Management Technical Team | Regeneration and Planning (Development Management) | Lancaster City Council

E: dm@lancaster.gov.uk | T: 01524 582950

Postal Address: PO Box 4 | Town Hall | Dalton Square | Lancaster | LA1 1QR

Office Address: Morecambe Town Hall | Marine Road East | Morecambe | LA4 5AF

From: [Jefferies, Spencer](#)
To: [A585 Windy Harbour to Skippool](#)
Subject: A585 Windy Harbour to Skippool consultation response
Date: 07 December 2017 20:45:03
Attachments: [Capture.PNG](#)

Good evening

Please accept this response on behalf of National Grid Gas plc (NGG) and National Grid Electricity Transmission plc (NGET)

NGG and NGET have no assets in the order boundary. Therefore no objection would be made to the order if proposed.

NGET's nearest asset(s) is the VF overhead line east of the potential development as shown on the capture.

Kind regards

Spencer Jefferies BSc

Development Liaison Officer
Acquisitions and Surveying
Network Management

National Grid House, Warwick Technology Park
Gallows Hill, Warwick. CV34 6DA
Mobile: 07812651481
Email: spencer.jefferies@nationalgrid.com
General enquiries: box.landandacquisitions@nationalgrid.com

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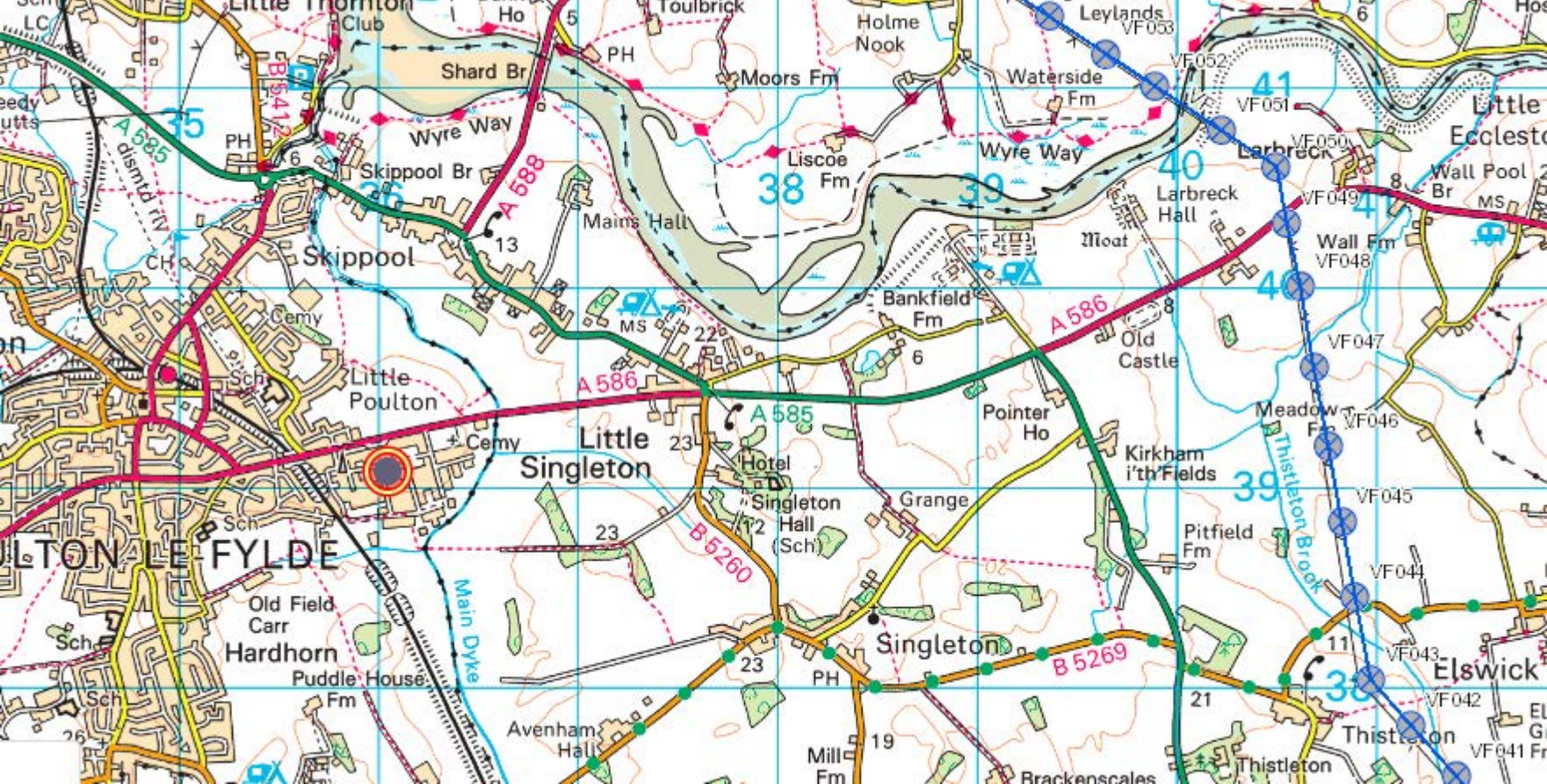
You may report the matter by contacting us via our [UK Contacts Page](#) or our [US Contacts Page](#) (accessed by clicking on the appropriate link)

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From: AULD, Alasdair E [mailto:Alasdair.Auld@nats.co.uk]

Sent: 09 November 2017 15:33

To: A585 Windy Harbour to Skippool

Cc: NATS Safeguarding

Subject: RE: SG25399 A585 Windy Harbour to Skippool Improvement Scheme - EIA scoping notification and consultation

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully,

Alasdair Auld
On behalf of NERL Safeguarding Office

Date: 06 December 2017
Our ref: 12817_231017
Your ref: TR010035-000008



FAO Emma Cottam
Planning Inspectorate

A585WindyHarbourtoSkipool@pins.gsi.gov.uk
BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Emma Cottam

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11.

Application by Highways England for an Order granting Development Consent for the A585 Windy Harbour to Skipool Improvement Scheme.

Scoping consultation response.

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in your consultation dated and received on 09 November 2017. We have already been involved with pre-application discussions with the applicant regarding this scheme and the scope for the Environmental Statement.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Case law¹ and guidance² has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for this development.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact Elizabeth Knowles on 0208 225 7506. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

¹ Harrison, J in *R. v. Cornwall County Council ex parte Hardy* (2001)

² *Note on Environmental Impact Assessment Directive for Local Planning Authorities* Office of the Deputy Prime Minister (April 2004) available from <http://webarchive.nationalarchives.gov.uk/http://www.communities.gov.uk/planningandbuilding/planning/sustainability/environmental/environmentalimpactassessment/noteenvironmental/>

Yours sincerely

Miss Elizabeth Knowles
Lead Adviser
Cheshire, Greater Manchester, Merseyside & Lancashire Area Team

Annex A – Advice related to EIA Scoping Requirements

1. General Principles

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2011, sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment.
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.
- A non-technical summary of the information.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

2. Biodiversity and Geology

2.1 Ecological Aspects of an Environmental Statement

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EclA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EclA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework sets out guidance in S.118 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

2.2 Internationally and Nationally Designated Sites

The ES should thoroughly assess the potential for the proposal to affect designated sites. European sites (eg designated Special Areas of Conservation and Special Protection Areas) fall within the scope of the Conservation of Habitats and Species Regulations 2017. In addition paragraph 118 of the National Planning Policy Framework requires that potential Special Protection Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites.

Special Protection Areas (SPAs) are classified for rare and vulnerable birds, and for regularly occurring migratory species. The birds for which SPAs are designated may also rely on areas outside of the SPA boundary (known as functionally linked land). These supporting habitats may be used by SPA populations or some individuals of the population for some or all of the time. These supporting habitats can play an essential role in maintaining SPA bird populations, and proposals affecting them may therefore have the potential to affect the SPA.

It should be noted that some of the potential impacts that may arise from the proposal relate to the presence of SPA interest features that are located outside the site boundary. It is advised that the potential for offsite impacts needs to be considered in assessing what, if any, potential impacts the proposal may have on European sites.

Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 an appropriate assessment needs to be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site.

Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

Sites of Special Scientific Interest (SSSIs) and sites of European or international importance (Special Areas of Conservation, Special Protection Areas and Ramsar sites) including land which is functionally linked to the designated sites.

The development site is within 1km of the following designated nature conservation sites and is contained within land which is thought to be functionally linked to the designated nature conservation sites:

- Morecambe Bay & Duddon Estuary Special Protection Area (SPA)
- Morecambe Bay Ramsar site
- Wyre-Lune recommended Marine Conservation Zone (rMCZ)
- Wyre Estuary Site of Special Scientific Interest (SSSI)
- Further information on the SSSI and its special interest features can be found at www.magic.gov. The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within these sites and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects.

- Natura 2000 network site conservation objectives are available on our internet site <http://publications.naturalengland.org.uk/category/6490068894089216>
- Conservation advice packages are also available on our internet site <https://designatedsites.naturalengland.org.uk/>

2.3 Regionally and Locally Important Sites

The EIA will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The Environmental Statement should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. Contact the local wildlife trust, geoconservation group or local sites body in this area for further information.

2.4 Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*. The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

In order to provide this information there may be a requirement for a survey at a particular time of year. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants. Natural England has adopted [standing advice](#) for protected species which includes links to guidance on survey and mitigation.

2.5 Habitats and Species of Principal Importance

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available here <https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regard-to-conserving-biodiversity>.

Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration...in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

Natural England advises that a habitat survey (equivalent to Phase 2) is carried out on the site, in order to identify any important habitats present. In addition, ornithological, botanical and invertebrate

surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (eg from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (eg whether priority species or habitat);
- The direct and indirect effects of the development upon those habitats and species;
- Full details of any mitigation or compensation that might be required.

The development should seek if possible to avoid adverse impact on sensitive areas for wildlife within the site, and if possible provide opportunities for overall wildlife gain.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of priority habitat for the area under consideration.

2.6 Contacts for Local Records

Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the local records centre, the local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document).

3. Landscape Character

Landscape and visual impacts

Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography. The European Landscape Convention places a duty on Local Planning Authorities to consider the impacts of landscape when exercising their functions.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed.

Natural England supports the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to

the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant [National Character Areas](#) which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

Heritage Landscapes

You should consider whether there is land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific or historic interest. An up-to-date list may be obtained at www.hmrc.gov.uk/heritage/lbsearch.htm.

4. Access and Recreation

Natural England encourages any proposal to incorporate measures to help encourage people to access the countryside for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

Rights of Way, Access land, Coastal access and National Trails

The EIA should consider potential impacts on access land, public open land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the nearby public rights of way. Appropriate mitigation measures should be incorporated for any adverse impacts. We also recommend reference to the relevant Right of Way Improvement Plans (ROWIP) to identify further details of the public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

5. Soil and Agricultural Land Quality

Impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 112 of the NPPF. We also recommend that soils should be considered under a more general heading of sustainable use of land and the ecosystem services they provide as a natural resource in line with paragraph 109 of the NPPF.

Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society, for example as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably.

Our records indicate there is a high likelihood of BMV land within the area encompassed by this proposal. This information is accessible from the Strategic Map which can be accessed via a link (Regional Agricultural Land Classification Maps > Likelihood of BMV Agricultural Land Strategic Scale Maps) at [Technical Information Note 049](#)

The applicant should consider the following issues as part of the Environmental Statement:

1. The degree to which soils are going to be disturbed/harmed as part of this development and whether 'best and most versatile' agricultural land is involved.

This may require a detailed survey if one is not already available. For further information on the availability of existing agricultural land classification (ALC) information see www.magic.gov.uk. Natural England Technical Information Note 049 - [Agricultural Land Classification: protecting the best and most versatile agricultural land](#) also contains useful background information.

2. If required, an agricultural land classification and soil survey of the land should be undertaken. This should normally be at a detailed level, eg one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, ie 1.2 metres.
3. The Environmental Statement should provided details of how any adverse impacts on soils can be minimised. Further guidance is contained in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#).

As identified in the NPPF new sites or extensions to new sites for peat extraction should not be granted permission by Local Planning Authorities or proposed in development plans.

6. Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition ([England Biodiversity Strategy](#), Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

7. Climate Change Adaptation

The [England Biodiversity Strategy](#) published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' ([NPPF](#) Para 109), which should be demonstrated through the ES.

8. Contribution to local environmental initiatives and priorities

Biodiversity enhancements

This application may provide opportunities to incorporate features into the design which are beneficial to wildlife such as the incorporation of roosting opportunities for bats, the installation of bird nest boxes, the use of native species in the landscape planting or the use of green infrastructure.

Multi-functional green infrastructure can perform a range of functions including improved flood risk management, provision of accessible green space, climate change adaptation and biodiversity enhancement.

We recommend that the ES should explore the inclusion of measures to enhance the biodiversity of the site. This is in accordance with Section 40(3) of the Natural Environment and Rural Communities Act (2006) which states that 'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'. Biodiversity 2020: A strategy for England's wildlife and ecosystem services and Making Space for Nature (2010) also provide strong drivers for the inclusion of biodiversity enhancements through the planning process.

9. Cumulative and in-combination effects

A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, ie projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

From: [Phil Cousins](#)
To: [A585 Windy Harbour to Skippool](#)
Cc: [Devcon Mailbox](#)
Subject: TR010035-000008 A585 Windy Harbour to Skippool Improvement Scheme
Date: 01 December 2017 12:30:30


TR010035-000008 A585 Windy Harbour to Skippool Improvement Scheme

Ms Cottam,

I refer to your consultation letter of 9 November in relation to Scoping Opinion for the above proposed development. I can confirm that Preston City Council has no comment to make on the Scoping Opinion.

Regards,

Phil Cousins
Principal Planning Officer

 Telephone: [+441772906584](tel:+441772906584)
 Planning Management
Town Hall, Lancaster Road, Preston, PR1 2RL

[Preston City Council](#)

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Your Ref: TR010035-000008

Our Ref: CIRIS 41615

1st December 2017

Dear Ms Cottam

**Planning Act 2008 (as amended) and The Infrastructure Planning
(Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) –
Regulations 10 and 11**

A585 Windy Harbour to Skippool Improvement scheme

Thank you for your letter of 9th November 2017, inviting Public Health England (PHE) to provide comments on the scoping opinion for the Environmental Statement (ES) relating to the above Nationally Significant Infrastructure Project (NSIP).

The comments below are provided on the basis that this stage is a precursor to a detailed assessment of the potential health impacts of the proposed development.

Our response focuses on health protection issues relating to chemicals, poisons and radiation. The advice offered is impartial and independent.

We have reviewed the 'A585 Windy Harbour to Skippool Improvement Scheme: Environmental Impact Assessment Scoping Report (dated November 2017)' and accept the general approach proposed for assessing potential impacts on human health.

In order to assist the production of an ES, we have included an appendix which outlines generic considerations that should be addressed when they are preparing an ES for an NSIP.

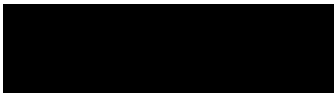
We note that a separate section summarising the potential impacts of the proposed development on public health is not proposed; we ask that this section be included, in line with the recommendations in the appendix that follows.

We note that assessment of fine particulate matter (PM_{2.5}) within the air quality section is not proposed and further justification for this is not provided. PM_{2.5} is of particular interest with regard to transport emissions and the impact of air quality upon public health. We would therefore request that this be considered in the air quality assessment.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. Our view is that the assessments undertaken to inform the ES should be proportionate to the potential impacts of the proposal. Where a promoter determines that it is not necessary to undertake detailed assessment(s) (e.g. undertakes qualitative rather than quantitative assessments), if the rationale for this is fully explained and justified within the application documents, we consider this to be an acceptable approach.

We will provide further comments when the ES becomes available.

Yours sincerely



Sian Morrow
Environmental Public Health Scientist
nsipconsultations@phe.gov.uk

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

Appendix: PHE recommendations regarding the scoping document

General approach

The EIA should give consideration to best practice guidance such as the Government's Good Practice Guide for EIA¹. It is important that the EIA identifies and assesses the potential public health impacts of the activities at, and emissions from, the proposal. Assessment should consider the development, operational, and decommissioning phases.

The EIA Directive² requires that ESs include a description of the aspects of the environment likely to be significantly affected by the development, including "population". The EIA should provide sufficient information for PHE to fully assess the potential impact of the development on public health. **PHE will only consider information contained or referenced in a separate section of the ES summarising the impact of the proposed development on public health:** summarising risk assessments, proposed mitigation measures, and residual impacts. This section should summarise key information and conclusions relating to human health impacts contained in other sections of the application (e.g. in the separate sections dealing with: air quality, emissions to water, waste, contaminated land etc.) without undue duplication. Compliance with the requirements of National Policy Statements and relevant guidance and standards should be highlighted.

It is not PHE's role to undertake these assessments on behalf of promoters as this would conflict with PHE's role as an impartial and independent body.

Consideration of alternatives (including alternative sites, choice of process, and the phasing of construction) is widely regarded as good practice. Ideally, the EIA should start at the stage of site and process selection, so that the environmental merits of practicable alternatives can be properly considered. Where this is undertaken, the main alternatives considered should be outlined in the ES³.

The following text covers a range of issues that PHE would expect to be addressed by the promoter. However this list is not exhaustive and the onus is on the promoter to ensure that the relevant public health issues are identified and addressed. PHE's advice and recommendations carry no statutory weight and constitute non-binding guidance.

Receptors

The ES should clearly identify the development's location and the location and distance from the development of off-site human receptors that may be affected by emissions from, or activities at, the development. Off-site human receptors may include people living in residential premises; people working in commercial and

¹ Environmental Impact Assessment: A guide to good practice and procedures - A consultation paper; 2006; Department for Communities and Local Government. Available from: <http://webarchive.nationalarchives.gov.uk/20120919132719/www.communities.gov.uk/documents/planningandbuilding/pdf/151087>

² Directive 85/337/EEC (as amended) on the assessment of the effects of certain public and private projects on the environment. Available from: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:1985L0337:20090625:EN:PDF>

³ DCLG guidance, 1999 <http://www.communities.gov.uk/documents/planningandbuilding/pdf/155958.pdf>

industrial premises; and people using transport infrastructure (such as roads and railways), recreational areas, and publicly-accessible land. Consideration should also be given to environmental receptors such as the surrounding land; surface and groundwater; and drinking water supplies, such as wells, boreholes and water abstraction points.

Impacts arising from construction and decommissioning

Any assessment of impacts arising from emissions due to construction and decommissioning should consider potential impacts on all receptors and describe monitoring and mitigation during these phases. Construction and decommissioning will be associated with vehicle movements and cumulative impacts should be accounted for.

We would expect the promoter to follow best practice guidance during all phases from construction to decommissioning to ensure appropriate measures are in place to mitigate any potential impact on public health from emissions (point source, fugitive and traffic-related). An effective Construction Environmental Management Plan (CEMP) (and Decommissioning Environmental Management Plan (DEMP)) will help provide reassurance that activities are well managed. The promoter should also ensure that there are robust mechanisms in place to respond to any complaints of traffic-related pollution, during construction, operation, and decommissioning of the facility.

Emissions to air and water

Significant impacts are unlikely to arise from sites which employ Best Available Techniques (BAT) and which meet regulatory requirements concerning emission limits and design parameters. However, PHE has a number of comments regarding emissions in order that the EIA provides a comprehensive assessment of potential impacts.

When considering a baseline (of existing environmental quality) and in the assessment and future monitoring of impacts these:

- should include appropriate screening assessments and detailed dispersion modelling where this is screened as necessary
- should encompass all pollutants which may be emitted by the development in combination with all pollutants arising from associated development and transport, ideally these should be considered in a single holistic assessment
- should consider the construction, operational, and decommissioning phases, as appropriate
- should consider the typical operational emissions, abnormal operation and accidents when assessing potential impacts and include an assessment of worst-case impacts
- should fully account for fugitive emissions
- should include appropriate estimates of background levels

- should identify cumulative and incremental impacts (i.e. assess cumulative impacts from multiple sources), including those arising from associated development, other existing and proposed development in the local area, and new vehicle movements associated with the proposed development; associated transport emissions should include consideration of non-road impacts (i.e. rail, sea, and air)
- should include consideration of local authority, Environment Agency, Defra national network, and any other local site-specific sources of monitoring data
- should compare predicted environmental concentrations to the applicable standard or guideline value for the affected medium (such as UK Air Quality Standards and Objectives and Environmental Assessment Levels)
 - If no standard or guideline value exists, the predicted exposure to humans should be estimated and compared to an appropriate health-based value (a Tolerable Daily Intake or equivalent). Further guidance is provided in Annex 1
 - This should consider all applicable routes of exposure e.g. include consideration of aspects such as the deposition of chemicals emitted to air and their uptake via ingestion
- should identify and consider impacts on residential areas and sensitive receptors (such as schools, nursing homes and healthcare facilities) in the area(s) which may be affected by emissions, this should include consideration of any new receptors arising from future development

Whilst screening of impacts using qualitative methodologies is common practice (e.g. for impacts arising from fugitive emissions such as dust), where it is possible to undertake a quantitative assessment of impacts then this should be undertaken.

PHE's view is that the EIA should appraise and describe the measures that will be used to control both point source and fugitive emissions and demonstrate that standards, guideline values or health-based values will not be exceeded due to emissions from the development, as described above. This should include consideration of any emitted pollutants for which there are no set emission limits. When assessing the potential impact of a proposed development on environmental quality, predicted environmental concentrations should be compared to the permitted concentrations in the affected media; this should include both standards for short and long-term exposure.

Additional points specific to emissions to air

When considering a baseline (of existing air quality) and in the assessment and when considering future monitoring of impacts these:

- should include consideration of impacts on existing areas of poor air quality e.g. existing or proposed local authority Air Quality Management Areas (AQMAs)
- should include modelling using appropriate meteorological data (i.e. come from the nearest suitable meteorological station and include a range of years and worst case conditions)

- should include modelling taking into account local topography

Additional points specific to emissions to water

When considering a baseline (of existing water quality) and in the assessment and future monitoring of impacts these:

- should include assessment of potential impacts on human health and not focus solely on ecological impacts
- should identify and consider all routes by which emissions may lead to population exposure (e.g. surface watercourses; recreational waters; sewers; geological routes etc.)
- should assess the potential off-site effects of emissions to groundwater (e.g. on aquifers used for drinking water) and surface water (used for drinking water abstraction) in terms of the potential for population exposure
- should include consideration of potential impacts on recreational users (e.g. from fishing, canoeing etc.) alongside assessment of potential exposure via drinking water

Land quality

We would expect the promoter to provide details of any hazardous contamination present on site (including ground gas) as part of the site condition report.

Emissions to and from the ground should be considered in terms of the previous history of the site and the potential of the site, once operational, to give rise to issues. Public health impacts associated with ground contamination and/or the migration of material off-site should be assessed⁴ and the potential impact on nearby receptors and control and mitigation measures should be outlined.

Relevant areas outlined in the Government's Good Practice Guide for EIA include:

- effects associated with ground contamination that may already exist
- effects associated with the potential for polluting substances that are used (during construction / operation) to cause new ground contamination issues on a site, for example introducing / changing the source of contamination
- impacts associated with re-use of soils and waste soils, for example, re-use of site-sourced materials on-site or offsite, disposal of site-sourced materials offsite, importation of materials to the site, etc.

Waste

The EIA should demonstrate compliance with the waste hierarchy (e.g. with respect to re-use, recycling or recovery and disposal).

For wastes arising from the development the EIA should consider:

⁴ Following the approach outlined in the section above dealing with emissions to air and water i.e. comparing predicted environmental concentrations to the applicable standard or guideline value for the affected medium (such as Soil Guideline Values)

- the implications and wider environmental and public health impacts of different waste disposal options
- disposal route(s) and transport method(s) and how potential impacts on public health will be mitigated

Other aspects

Within the EIA PHE would expect to see information about how the promoter would respond to accidents with potential off-site emissions e.g. flooding or fires, spills, leaks or releases off-site. Assessment of accidents should: identify all potential hazards in relation to construction, operation and decommissioning; include an assessment of the risks posed; and identify risk management measures and contingency actions that will be employed in the event of an accident in order to mitigate off-site effects.

There is evidence that, in some cases, perception of risk may have a greater impact on health than the hazard itself. A 2009 report⁵, jointly published by Liverpool John Moores University and PHE, examined health risk perception and environmental problems using a number of case studies. As a point to consider, the report suggested: “Estimation of community anxiety and stress should be included as part of every risk or impact assessment of proposed plans that involve a potential environmental hazard. This is true even when the physical health risks may be negligible.” PHE supports the inclusion of this information within EIAs as good practice.

Electric and magnetic fields (EMF)

This statement is intended to support planning proposals involving electrical installations such as substations, underground cables and overhead lines. PHE advice on the health effects of power frequency electric and magnetic fields is available in the following link:

<https://www.gov.uk/government/collections/electromagnetic-fields#low-frequency-electric-and-magnetic-fields>

There is a potential health impact associated with exposure to the electric and magnetic fields produced around substations, power lines and cables. The following information provides a framework for considering the health impact, including the direct and indirect effects of exposure.

Policy Measures for the Electricity Industry

In 2004, the Government adopted the exposure guidelines published in 1998 by the International Commission on Non-Ionizing Radiation Protection (ICNIRP) within the framework of the 1999 EU Council Recommendation on limiting exposure of the general public (1999/519/EC). In 2009, one additional precautionary policy was introduced relating to the optimum phasing of high-voltage power lines. The National

⁵ Available from: <http://www.cph.org.uk/publication/health-risk-perception-and-environmental-problems/>

Policy Statement for Electricity Network Infrastructure EN-5 confirms these policies, and the Department of Energy and Climate Change (DECC) has published two accompanying Codes of Practice, agreed between the Energy Network Association and the Government, which specify how the guideline compliance and the optimum phasing requirements are implemented:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/37447/1256-code-practice-emf-public-exp-guidelines.pdf

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/48309/1255-code-practice-optimum-phasing-power-lines.pdf

A companion code of practice dealing with indirect effects of exposure to power frequency electric fields is also available:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/224766/powerlines_vcop_microshocks.pdf

Exposure Guidelines

PHE recommends the adoption in the UK of the EMF exposure guidelines published by the International Commission on Non-ionizing Radiation Protection (ICNIRP). Formal advice to this effect was published by one of PHE's predecessor organisations (NRPB) in 2004 based on an accompanying comprehensive review of the scientific evidence:

<http://webarchive.nationalarchives.gov.uk/20140629102627/http://www.hpa.org.uk/Publications/Radiation/NPRBArchive/DocumentsOfTheNRPB/Absd1502/>

Updates to the ICNIRP guidelines for static fields have been issued in 2009 and for low frequency fields in 2010. However, the Government policy is that the ICNIRP guidelines are implemented in line with the terms of the 1999 EU Council Recommendation on limiting exposure of the general public (1999/519/EC):

http://webarchive.nationalarchives.gov.uk/+www.dh.gov.uk/en/PublicHealth/HealthProtection/DH_4089500

Static magnetic fields

For static magnetic fields, the ICNIRP guidelines published in 2009 recommend that acute exposure of the general public should not exceed 400 mT (millitesla), for any part of the body, although the previously recommended value of 40 mT is the value used in the Council Recommendation. However, because of potential indirect adverse effects, ICNIRP recognises that practical policies need to be implemented to prevent inadvertent harmful exposure of people with implanted electronic medical devices and implants containing ferromagnetic materials, and injuries due to flying ferromagnetic objects, and these considerations can lead to much lower restrictions, such as 0.5 mT.

Power frequency electric and magnetic fields

At 50 Hz, the known direct effects include those of induced currents in the body on the central nervous system (CNS) and indirect effects include the risk of painful spark discharge on contact with metal objects exposed to the field. The ICNIRP guidelines published in 1998 give reference levels for public exposure to 50 Hz electric and magnetic fields, and these are respectively 5 kV m^{-1} (kilovolts per metre) and $100 \text{ }\mu\text{T}$ (microtesla). The reference level for magnetic fields changes to $200 \text{ }\mu\text{T}$ in the revised (ICNIRP 2010) guidelines because of new basic restrictions based on induced electric fields inside the body, rather than induced current density. If people are not exposed to field strengths above these levels, direct effects on the CNS should be avoided and indirect effects such as the risk of painful spark discharge will be small. The reference levels are not in themselves limits but provide guidance for assessing compliance with the basic restrictions and reducing the risk of indirect effects.

Long term effects

There is concern about the possible effects of long-term exposure to electromagnetic fields, including possible carcinogenic effects at levels much lower than those given in the ICNIRP guidelines. In the NRPB advice issued in 2004, it was concluded that the studies that suggest health effects, including those concerning childhood leukaemia, could not be used to derive quantitative guidance on restricting exposure. However, the results of these studies represented uncertainty in the underlying evidence base, and taken together with people's concerns, provided a basis for providing an additional recommendation for Government to consider the need for further precautionary measures, particularly with respect to the exposure of children to power frequency magnetic fields.

The Stakeholder Advisory Group on ELF EMFs (SAGE)

SAGE was set up to explore the implications for implementing precautionary measures for extremely low frequency electric and magnetic fields (ELF EMFs), and to make practical recommendations to Government:

<http://www.emfs.info/policy/sage/>

SAGE published its First Interim Assessment in 2007, recommending various low cost measures aimed at reducing exposure. One of the recommendations was the introduction of optimal phasing of dual circuit high voltage power lines, which the Government supported in its response published in 2009. Government was also asked to consider the option to create corridors adjacent to high voltage power lines on health grounds; however, this was not supported as it was regarded to be disproportionate given the evidence base on the potential health risks arising from exposure. The full Government response to SAGE's First Interim Assessment is available here:

http://webarchive.nationalarchives.gov.uk/20130107105354/http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_107124

SAGE also called for more information to be made available to the public on the possible health consequences of power frequency electric and magnetic fields, and the Health Protection Agency developed new web material, which is available here:

<http://webarchive.nationalarchives.gov.uk/20140629102627/http://www.hpa.org.uk/Topics/Radiation/UnderstandingRadiation/UnderstandingRadiationTopics/ElectromagneticFields/ElectricAndMagneticFields/>

Liaison with other stakeholders, comments should be sought from:

- the local authority for matters relating to noise, odour, vermin and dust nuisance;
- the local authority regarding any site investigation and subsequent construction (and remediation) proposals to ensure that the site could not be determined as 'contaminated land' under Part 2A of the Environmental Protection Act 1990;
- the local authority regarding any impacts on existing or proposed Air Quality Management Areas;
- the Food Standards Agency for matters relating to the impact on human health of pollutants deposited on land used for growing food/ crops;
- the Environment Agency for matters relating to flood risk and releases with the potential to impact on surface and groundwaters;
- the Environment Agency for matters relating to waste characterisation and acceptance; and,
- The local authority Director of Public Health for Lancashire Council for matters relating to wider public health.

Environmental Permitting

Amongst other permits and consents, the development may require an environmental permit from the Environment Agency to operate (under the Environmental Permitting (England and Wales) Regulations 2010). If so, any permitted activity will need to comply with the requirements of best available techniques (BAT). PHE is a consultee for bespoke environmental permit applications and will respond separately to any such consultation.

Annex 1

Human health risk assessment (chemical pollutants)

The points below are cross-cutting and should be considered when undertaking a human health risk assessment:

- The promoter should consider including Chemical Abstract Service (CAS) numbers alongside chemical names, where referenced in the ES
- Where available, the most recent United Kingdom standards for the appropriate media (e.g. air, water, and/or soil) and health-based guideline values should be used when quantifying the risk to human health from chemical pollutants. Where UK standards or guideline values are not available, those recommended by the European Union or World Health Organization can be used
- When assessing the human health risk of a chemical emitted from a facility or operation, the background exposure to the chemical from other sources should be taken into account
- When quantitatively assessing the health risk of genotoxic and carcinogenic chemical pollutants PHE does not favour the use of mathematical models to extrapolate from high dose levels used in animal carcinogenicity studies to well below the observed region of a dose-response relationship. When only animal data are available, we recommend that the 'Margin of Exposure' (MOE) approach⁶ is used

⁶ Benford D et al. 2010. Application of the margin of exposure approach to substances in food that are genotoxic and carcinogenic. Food Chem Toxicol 48 Suppl 1: S2-24



A585 Windy Harbour to Skippool Improvement

Royal Mail Group Limited comments on information to be provided in applicant's Environmental Statement

Introduction

Reference the letter from PINS to Royal Mail dated 9 November 2017 requesting Royal Mail's comments on the information that should be provided in Highways England's Environmental Statement for the proposed A585 Windy Harbour to Skippool Improvement .

Royal Mail's consultants BNP Paribas Real Estate have reviewed the applicant's Scoping Report as submitted to the Secretary of State on 8 November 2017.

Royal Mail– relevant information

Royal Mail is responsible for providing efficient mail sorting and delivery nationally. As the Universal Service Provider under the Postal Services Act 2011, Royal Mail has a statutory duty to deliver mail to every residential and business address in the country as well as collecting mail from all Post Offices and post boxes six days a week.

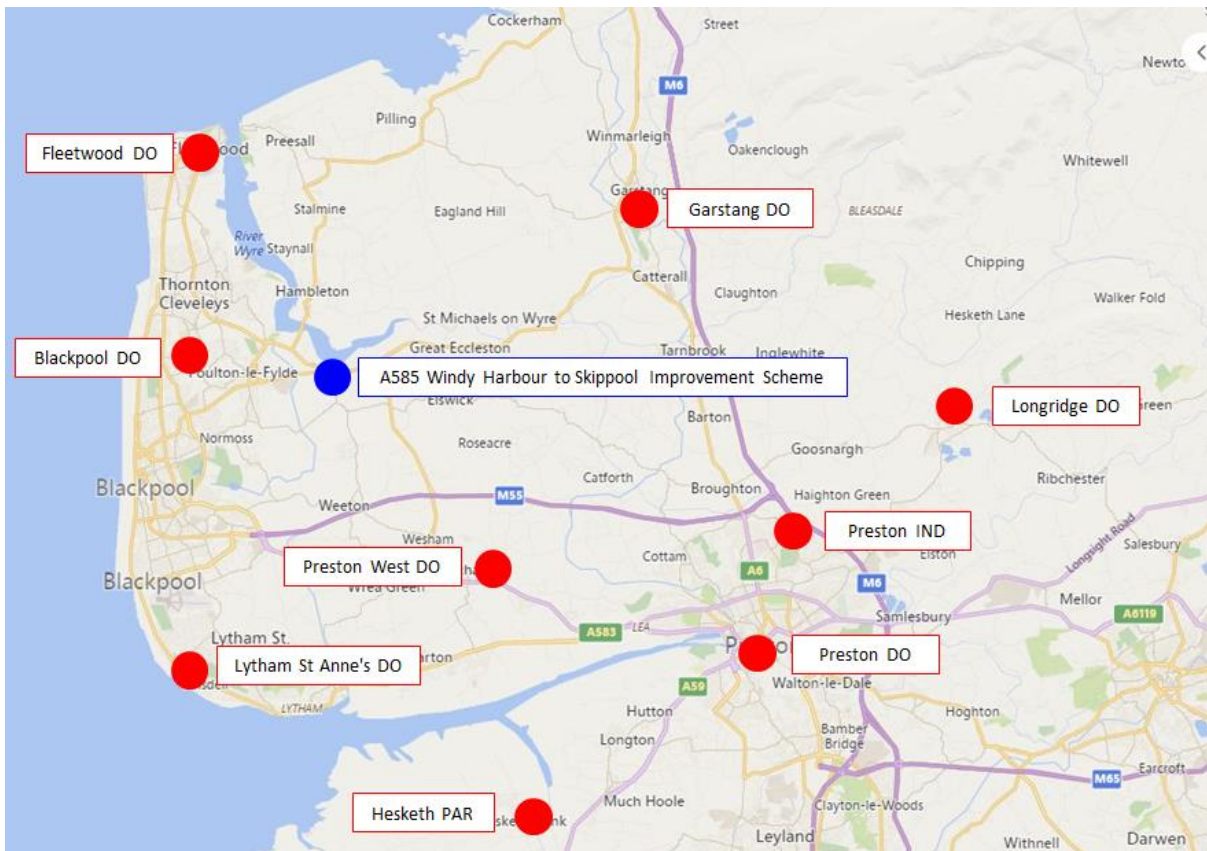
Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network.

Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail's business.

Royal Mail therefore wishes to ensure the protection of its future ability to provide an efficient mail sorting and delivery service to the public in accordance with its statutory obligations which may potentially be adversely affected by the construction of this proposed road scheme.

Royal Mail's has nine operational properties within 25 miles of this proposed road improvement scheme as listed and shown on plan below:

Blackpool Delivery Office	Hawking Place, Blackpool FY2 0XX	4.3 miles
Fleetwood Delivery Office	Station Road, Fleetwood FY7 6NW	6.9 miles
Preston West Delivery Office	9-10 Kirkham Trading Park, Preston PR4 3AB	7.5 miles
Garstang Delivery Office	Church Street, Preston PR3 1AG	10.0 miles
Preston Industrial	Pittman Way, Preston PR2 9GG	13.5 miles
Lytham St Andrews Delivery Office	270 Clifton Drive South, Lytham St Anne's FY8 1AA	14.1 miles
Preston Delivery Office	Christian Road, Preston PR1 1AD	15.2 miles
Longridge Delivery Office	Green Lane, Preston PR3 3AA	18.5 miles
Hesketh Vehicle Park	Hesketh Lane SPDO, Preston PR4 6SN	24.1 miles



The A585 is an important distribution route for Royal Mail operational traffic. Also, in exercising its statutory duties Royal Mail vehicles use on a daily basis all of the local roads that may potentially be affected by additional traffic arising from the construction of the proposed new dual carriageway bypass and associated junctions / infrastructure.

It is envisaged that the proposed A585 highway improvements will, once constructed, reduce congestion on the A585 which will have benefits for Royal Mail operational traffic movements. However, Royal Mail is concerned about the potential for disruption to its operations during the construction phase.

Royal Mail's comments on information that should be provided in Highways England's Environmental Statement

In view of the above, Royal Mail has the following comments / requests:

1. The ES should include information on the needs of major road users (such as Royal Mail) and acknowledge the requirement to ensure that major road users are not disrupted though full advance consultation by the applicant at the appropriate time in the DCO and development process.
2. The ES and DCO application should include detailed information on the construction traffic mitigation measures that are proposed to be implemented by Highways England / its contractor, including a draft Construction Traffic Management Plan (CTMP).



3. Royal Mail is fully pre-consulted by Highways England / its contractor on any proposed road closures / diversions/ alternative access arrangements, hours of working and the content of the CTMP. The ES should acknowledge the need for this consultation with Royal Mail and other relevant major road users.

Royal Mail is able to supply Highways England with information on its road usage / trips if required.

Should PINS or Highways England have any queries in relation to the above then in the first instance please contact Holly Trotman (***holly.trotman@royalmail.com***) of Royal Mail's Legal Services Team or Daniel Parry-Jones (***daniel.parry-jones@bnpparibas.com***) of BNP Paribas Real Estate.

From: [Liz Beard](#)
To: [A585 Windy Harbour to Skippool](#)
Subject: Application by Highways England for an Order granting Development Consent for the A585 (Windy Harbour to Skippool Improvement).
Date: 28 November 2017 11:36:47

For the attention of Emma Cottam

Dear Emma

Thank you for sending the letter to Sefton Council ,on 9th November 2017, in relation to the above and requesting whether we have any comments on the Scoping Report.

I can confirm that Sefton Council do not have any comments to make in relation to the Scoping Report.

If you have any queries then please contact me on the email address provided.

Regards

Liz Beard

Liz Beard
Senior Planner
Planning Services (Development Management)
Sefton Council
Magdalen House
30 Trinity Road
Bootle, L20 3NJ

Tel: 0345 140 0845 (Option 4)

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From: [REDACTED]
To: [A585 Windy Harbour to Skippool](#)
Subject: A585 Windy Harbour to Skippool Improvement Scheme -EIA Scoping notification and consultation
Date: 27 November 2017 17:02:15

Dear Sirs,

Singleton Parish Council considered your document forwarded to them by Emma Cottam, at their Parish Council meeting held on 16 November 2017. After due consideration I have been asked to respond on the Parish Council's behalf as follows: -

- Singleton Parish Council is not convinced of the merits of the proposed by-pass and does not feel that it will answer the current problems. It does not feel that it will improve the journey time between the M55 and Fleetwood overall.
- The rate of travelling will only be as good as the slowest points on the A585 and there are still going to be two pinch points - Skippool Junction and Thistleton - where no improvements are planned.
- People on the south side of Garstang Road and the Lodge Lane residents must have impact measures taken and the land bridge area be returned to pasture land as well as providing effective screening of the by-pass. This is essential to help mitigate the impact this by-pass will have on local people's lives.

Yours faithfully,

Verena M Henderson,
Clerk to Singleton Parish Council

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

From: Melanie Hale [mailto:MelanieHale@sthelens.gov.uk]
Sent: 13 November 2017 09:17
To: A585 Windy Harbour to Skippool
Subject: Re: Fw: A585 Windy Harbour to Skippool Improvement Scheme - EIA scoping notification and consultation

Further to your email regarding the above, I can confirm that St Helens Council has no comment to make.

Melanie Hale
Service Manager - Development
01744 676115

From: Danielle Thomas [mailto:Danielle.Thomas@wwutilities.co.uk] **On Behalf Of** Dig
Sent: 15 November 2017 11:36
To: A585 Windy Harbour to Skippool
Subject: RE: A585 Windy Harbour to Skippool Improvement Scheme - EIA scoping notification and consultation

Good morning

With regards to your below request, this is not Wales & West Utilities area. This falls within Cadent's area, contact details for them below:

Email: plantprotection@cadentgas.com
Telephone: 0800 688588

If you have any further questions please don't hesitate to contact me. Many thanks

Kind Regards,

Danielle Thomas
Plant Protection Team
Administrator Assistant

Telephone: **02920 278 912**
Email: Danielle.Thomas@wwutilities.co.uk

Wales & West Utilities Ltd | Wales & West House | Spooner Close | Celtic Springs | Newport | NP10 8FZ





**Directorate of Development and
Regeneration Services**

**John R Harrison DipEnvP, MRTPI
Director of Development and
Regeneration**

PO Box 16 , 52 Derby Street
Ormskirk , West Lancashire L39 2DF
Telephone: 01695 577177
Website: www.westlancs.gov.uk
Email: plan.apps@westlancs.gov.uk

Date: 6 December 2017
Your ref: TR010035-000008
Our ref: L/2017/0508/AAA
Please ask for: Mr R Hitchcock
Direct dial no: 01695 585343
Extension:

The Planning Inspectorate
3D Eagle Wing
Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Sir/Madam,

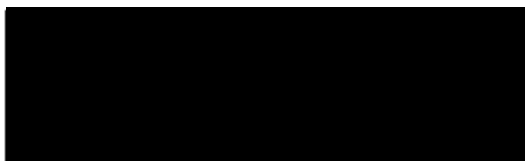
Proposal: Scoping Opinion - Application by Highways England for an Order granting Development Consent for the A585 Windy Harbour to Skippool Improvement Scheme.
Location: A585 Windy Harbour To Skippool Improvement Scheme,, ,

I refer to the above consultation received on 9th November 2017.

West Lancashire Borough Council has NO COMMENTS to make in respect of the submitted request to the Secretary of State for a scoping opinion under the Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

I would be grateful to receive a copy of your Council's Committee Report and Decision Notice for this application.

Yours faithfully,



John R Harrison, DipEnvP, MRTPI
Director of Development and Regeneration

**Kim Webber B.Sc., M.Sc.
Chief Executive**

From: Richard Graham [mailto:Richard.Graham@yorkshiredales.org.uk]

Sent: 10 November 2017 09:40

To: A585 Windy Harbour to Skippool

Subject: FW: A585 Windy Harbour to Skippool Improvement Scheme - EIA scoping notification and consultation

Dear Sir/Madam

I can confirm that the Yorkshire Dales National Park Authority does not wish to comment as the proposal would not materially affect the National Park.

regards

Richard Graham



Richard Graham
Head of Development Management

Direct: 01969 652302
Switchboard: 0300 456 0030

[Website](#) [Facebook](#) [Twitter](#)

Yorkshire Dales National Park Authority
Yoredale | Bainbridge | Leyburn | DL8 3EL