

A585 Windy Harbour to Skippool Improvement Scheme

TR010035

7.9 Comments on Relevant Representations

APFP Regulation 5(2)(q)

Planning Act 2008

Infrastructure Planning (Applications: Prescribed
Forms and Procedure) Regulations 2009

Volume 7

April 2019

Infrastructure Planning

Planning Act 2008

The Infrastructure Planning
(Applications: Prescribed Forms and
Procedure) Regulations 2009

**A585 Windy Harbour to Skippool
Improvement Scheme**
Development Consent Order 20[]

COMMENTS ON RELEVANT REPRESENTATIONS

Regulation Number:	Regulation 5(2)(q)
Planning Inspectorate Scheme Reference	TR010035
Application Document Reference	TR010035/APP/ 7.9
Author:	A585 Windy Harbour to Skippool Improvement Scheme Project Team, Highways England

Version	Date	Status of Version
Rev 0	April 2019	Submission at Deadline 1

CONTENTS

1 **COMMENTS ON RELEVANT REPRESENTATIONS**1

APPENDICES

Appendix A – Cross Section53

LIST OF TABLES

Table 1-1: Applicant’s Responses to the Relevant Representations (RR)2

Page Left Intentionally Blank

ABBREVIATIONS

Abbreviations contained within this document are listed below with an indication of their meaning in the context of this Scheme.

Abbreviation	Meaning
AA	Appropriate Assessment
ALC	Agricultural Land Classification
AMCB	Analysis of Monetised Costs and Benefits
BCR	Benefit to Cost Ratio
BMV	Best and Most Versatile (in relation to agricultural land)
C4 Estimate	A detailed estimate of the cost of utilities apparatus diversions
Outline CEMP	Outline Construction Environmental Management Plan
DCO	Development Consent Order application
dDCO	Draft Development Consent Order
DML	Deemed Marine Licence
DMRB	Design Manual for Roads and Bridges
EA	Environment Agency
ES	Environmental Statement
FRA	Flood Risk Assessment
FRAP	Flood Risk Activity Permit
HER	Lancashire's Historic Environment Record
HGV	Heavy goods vehicle
HRA	Habitats Regulations Assessment
IAN 195/16	Interim Advice Note 195 "Cycle Traffic and the Strategic Road Network"
LCC	Lancashire County Council
LLFA	Lead Local Flood Authority (Lancashire County Council for this Scheme)
LPA	Local Planning Authority (either Fylde Borough Council or Wyre Council)
LTN 2/08	Local Transport Note 2/08 "Cycle Infrastructure Design"
MCAA	Marine and Coastal Access Act 2009
pMCZ	(Proposed) Marine Conservation Zone
MHWS	Mean High Water Springs
MMO	Marine Management Organisation
MOD	Ministry of Defence
MOVA	Microprocessor Optimised Vehicle Actuation
NIR	Noise Insulation Regulations
NMU	Non-motorised users (walkers, cyclists and horse riders)
NPPF	National Planning Policy Framework
OCR	Off carriageway route (for cyclists)
PEIR	Preliminary Environmental Information Report – contained in Appendix L of the Consultation Report
PHE	Public Health England
PM10 & PM2.5	Particulate Matter (related to air quality)
REAC	Record of Environmental Actions and Commitments
RIS1	Highways England's Road Investment Strategy - Tranche 1

Abbreviation	Meaning
RR	Relevant Representation
RSPB	Royal Society for the Protection of Birds
SAC	Special Area of Conservation
SMP	Soil Management Plan
SOAEL	Significant Observed Adverse Effect Level (related to noise)
SoCC	Statement of Community Consultation
SoCG	Statement of Common Ground
SPA	Special Protection Area
SRN	Strategic Road Network (Trunk Roads and Motorways)
SRP	Soil Resources Plan
SSSI	Site of Special Scientific Interest
TA90/05	TA 90/05 "The Geometric Design of Pedestrian, Cycle and Equestrian Routes"
TA91/05	TA 91/05 "Provision for Non-Motorised Users"
TOUCAN	An unsegregated signal-controlled crossing for pedestrians and cyclists, linking cycle track and footway systems on opposite sides of a carriageway and often forms part of a traffic signal-controlled junction
TUBA	Transport User Benefit Appraisal
UKCP18	UK Climate Projections 2018
WRAP	Waste and Resources Action Plan

1 COMMENTS ON RELEVANT REPRESENTATIONS

- 1.1.1 The purpose of this document is to set out the Applicant's comments on the Relevant Representations (RR) from the interested parties.
- 1.1.2 These can be found in Table 1-1 below.

Table 1-1: Applicant's Responses to the Relevant Representations (RR)

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
RR-001	Rodney Barnes	
1.1	1.The estimated cost of this scheme currently £105m+ surely cannot be justified given the proposed bypass will only give a savings on journey time of no more than 4 minutes	As detailed in the Transport Assessment (document reference TR010035/APP/7.4) travel time savings of between 2 and 4.5 minutes per journey are forecast to be saved by road users due to the Scheme. Time savings were considered within the Benefit to Cost Ratio (BCR), although they were not the only benefit considered. The Analysis of Monetised Costs and Benefits (AMCB) brings the user benefits and Scheme costs together with the accident, noise, air quality and greenhouse gas impacts, where they can be quantified to generate the measures of economic worth, including the Scheme's Initial BCR. The BCR indicates how much benefit is obtained for each unit of cost, with a BCR greater than 1 indicating that the benefits outweigh the costs. The initial BCR of the Scheme is 1.26. Including weekend benefits, journey time reliability and wider impacts to provide an adjusted BCR increases the BCR to 2.02. Therefore, it is concluded that the Scheme is worthwhile to proceed with in economic terms as presented in Planning Statement and National Policy Accordance Section, 2.9 (document reference TR010035/APP/7.1).
1.2	2.As there is no scope to improve the single lane carriageways on the A585 either end at Windy Harbour or Skippool/Amounderness Way, this proposed bypass will only achieve in moving traffic from one bottle neck to the other bottleneck.	As defined in Highways England's Road Investment Strategy (RIS) 1 Delivery Plan, the Scheme requirements were to assess the A585 from Windy Harbour Junction to Skippool Junction to address the congestion and safety concerns at the junctions along this stretch. The Scheme proposed will still generate economic, operational and environmental benefits without any extension to the M55 or towards Fleetwood as presented in the Planning Statement and National Policy Accordance (document reference TR010035/APP/7.1) Section 2.9. In addition, the Highways England Operations Directorate is conducting investigatory studies for the A585/B5269 (Thistleton/Mile Road) and the M55 Junction 3 along Fleetwood Road that are separate from the A585 Windy Harbour to Skippool Improvement Scheme. A sensitivity test was undertaken by the Applicant that considered the impact of other Operations Directorate schemes on the A585 Windy Harbour to Skippool Improvement Scheme which showed that when including the capacity improvement upgrades of adjacent potential Operations Directorate schemes along the A585 route it remained economically worthwhile (based on an assessment of Transport User Benefits only) to proceed with the A585 Windy Harbour to Skippool Improvement Scheme. The impact of the Scheme on traffic distribution across the highway network has been assessed and can be found in the Scheme Combined Modelling and Appraisal Report (document reference TR010035/APP/7.12) Appendix F and H.
1.3	3.Given the additional number of private residencies being built now and in the near future to meet local and government objectives surely the bypass direct to the M55 would be more logical	The Highways England Operations Directorate is conducting investigatory studies for Norcross, the A585/B5269 (Thistleton/Mile Road) and the M55 Junction 3 along Fleetwood Road that are separate from the A585 Windy Harbour to Skippool Improvement Scheme.
RR-002	Irene B.O	
2.1	The new road passes at the back of my property	Noted – no further response required.
RR-003	Ian Brooker	
3.1	The outline of the main points are: 1. The consultation has not been adequately consulted. For example, but not limited	Whilst only one "bypass" option was presented at consultation (both non-statutory in 2016 and statutory in 2018), alternatives to this have been considered as outlined in the Environmental

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
	<p>to, the first consultation carried out in September 2016 presented just two 'options' only one of which was a bypass. No alternative bypass routes have been put to the public for consideration. HE's preliminary optioneering without public engagement considered a range of options. This included five southern corridor options (S1-S5), two northern corridor options (N1 and N2) and two online corridors (O1 and O2). Nine options in all. So seven options were dropped before the people living in the vicinity were engaged through consultation. Of the two options the first non-statutory consultation set out, only one was a by pass route, the second was enhancements to the existing A585 route. Between stage one and two consultations, Option 1 was further developed on the basis that there was over 70% support for the bypass in the first consultation. We believe the latter was support for 'a' by pass and not 'the' bypass. It is not a surprise that local residents will want a bypass. Where the local views are most important is in providing guidance on the best way of providing the bypass. It seems that, as only one option is now being pursued, the potential of local people and organisations influencing 'by pass' options has been avoided as a result of the process HE have adopted. The 2018 consultation was the first consultation where legal stipulation to 'have regard to' the responses of consultees applied, yet there are no alternative by-pass options available and the main decisions have been taken.</p>	<p>Statement Chapter 6.4 Alternatives Assessment (document reference TR010035/APP/6.4). A total of nine options were developed during the initial scheme development stages for the Scheme but, for technical, operational and cost reasons only two options were taken forward to the non-statutory consultation, with a further option being presented as an option "previously considered but rejected". The non-statutory consultation informed the preferred route announcement. The preferred route offers the best combination of benefits whilst working within the constraints of the site. Alternative routes proposed by members of the public have been evaluated but none are able to offer comparable benefits to the proposed alignment.</p> <p>The statutory consultation was held in accordance with the Statement of Community Consultation (SoCC) as detailed in the Consultation Report (document reference TR010035/APP/5.1) section 4.3 and Section 47 of the Planning Act 2008. The SoCC was agreed with Lancashire County Council, Wyre Council and Fylde Borough Council. Consultation material was available to view online and at deposit locations around the Scheme area. Section 42 letters were sent in accordance with the requirements of the Planning Act 2008, a Section 46 notification letter was sent to the Planning Inspectorate and four public consultation events were held in accordance with Section 47 of the Planning Act 2008.</p>
3.2	<p>2. The scheme will not achieve its objectives as listed in the DCO materials, as evidenced by the work on Windy harbour the congestion is only moved to a different location on the A585 and overall not reduced.</p>	<p>Refer to RR-001 (1.2)</p>
3.3	<p>3. What has come as a huge surprise is that the benefit expected from the scheme is as follows; "Travel time savings of between 2 and 4.5 minutes per journey are forecast to be saved by road users due to the Scheme." This is a negligible saving and given that this is an estimate there must be the possibility that this could make no difference, or in fact create a longer journey time. Have longer journey times resulted from the modelling scenarios that have been performed? For all the minutes added onto journey times through the construction period, how long will this scheme take to offer a net benefit?</p>	<p>The 2 to 4.5 minute travel time savings per journey are presented from Windy Harbour to Skippool as this shows a comparison of the direct impact of the Scheme along the A585 Improvement. This is based on an average weekday. It is appreciated that there may be some journeys that may take slightly longer as a result of the Scheme but overall the Scheme produces journey time savings and over a 60-year period, this equates to just over £150million saving from journey time improvements. To take into account uncertainty of the future situation, three different scenarios were assessed taking account of estimates of future population, housing and employment forecasts and all of these scenarios forecast a journey time improvement in the future compared to the situation without the improvement.</p> <p>Journey time improvements are also not the only consideration when deciding whether a Scheme is suitable; other impacts such as safety, delays due to maintenance activities, journey time reliability, wider economic impacts, and a range of environmental considerations are also taken into account.</p> <p>The monetised transport user benefits were prepared using the Department for Transport's appraisal software TUBA (Transport User Benefit Appraisal). This estimated the direct user and provider benefits in terms of travel time savings and vehicle operating cost savings using the traffic forecasts output from the Scheme's transport model. The Department for Transport publishes the appraisal and modelling values including the road user values of time and vehicle operating costs to ensure that all proposed schemes are appraised in a standard way. This information is included in the TUBA software in order to calculate travel times and vehicle operating costs, that can then be compared to the travel time savings from the traffic model. This will determine the road user benefit attributable to the proposed Scheme.</p> <p>Traffic management during construction tends to result in changes to journey times and vehicle operating costs. These impacts are appraised within the economic appraisal of the Scheme; therefore, the additional delay to users during the construction period has been taken into account in this appraisal. Part of the Scheme will be constructed along the existing alignment</p>

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
		<p>such as the section between Skippool Junction and Skippool Bridge Junction and along Garstang New Road. Highways England policy is to ensure that during peak times a two-way flow is maintained; although they will be subject to speed restriction due to a narrow lane arrangement and hence additional delay may occur at this location. The overall transport disbenefit (including indirect tax revenue and greenhouse gases benefits) during construction of the Scheme is approximately £3.2million (2010 prices and discounted to 2010). Following profiling of the journey time (TUBA benefits excluding weekends) the user benefits it would take approximately 1 year 3 months to get a net benefit considering the disbenefits through the construction period.</p>
3.4	4. This scheme cannot possibly pass any value for money test or justify the disruption, including environmental impact, that the construction period would create for such a negligible benefit.	<p>The Planning Statement and National Policy Accordance (document reference TR010035/APP/7.1), Section 2.9, concluded that it is worthwhile in economic terms to proceed with the Scheme. Section 5.8 of the same document summarises the conclusions of the Planning Balance, which outlines a compelling case in the public interest for the Scheme. An Environmental Statement has been prepared for the Scheme (document references TR010035/APP/6.1 - TR010035/APP/6.20) using agreed methodology. Each Environmental Statement chapter assesses the residual impacts on the environment following the implementation of mitigation. A summary of the environmental impacts of the Scheme are presented in Chapter 17: Summary (document reference TR010035/APP/6.17). The delay to road users during the construction period due to traffic management and speed restrictions is taken into consideration and is quantified as part of the economic assessment of the Scheme.</p>
3.5	5. If the argument is that safety would be increased then this also must be negligible as Highways England have been consultees in approving at least 2 schemes in 2018 to add additional connections to the A585 either side of the proposed connection of the bypass at Skippool. One scheme to add 9 dwellings to the A585 with a new connection to A585 being required and a commercial development approximately opposite the Skippool petrol station which now limits the A585 to one lane in each direction (further limiting traffic flow).	<p>The design standard of the bypass is a high-speed (70mph) dual carriageway, and therefore according to the policies set out in The Department for Transport Circular 02/2013 “The Strategic Road Network (SRN) and the Delivery of Sustainable Development”, no new direct connections onto the bypass would be permitted unless the relevant Local Plan can demonstrate that such a connection is necessary to facilitate strategic-level planned growth within the corresponding Local Plan. The adopted Fylde Local Plan does not allocate any of the land surrounding the bypass for development of a strategic level; in the context of the SRN developments of at least a regional strategic significance.</p> <p>Mains Lane is a single carriageway lower speed route (40mph), and so new connections are permitted provided that they do not have an adverse impact on traffic flows and safety. The impact on traffic flow and safety of the two developments referenced will have been considered through the planning process.</p>
3.6	6. Our property is very close to the proposed scheme; we are concerned about the effects of increased road noise and degradation of air quality due to vehicle emissions. Access to the A585 both vehicular and pedestrian will be compromised and unsafe.	<p>Increases in road traffic noise levels generated by the Scheme in this location would be mitigated to a minimum and below a level where significant adverse effects on health would occur through the implementation of low noise surfacing, a 2 metre high noise barrier and earth bunds as presented in Figure 11.4 of the Environmental Statement Chapter 11: Noise and Vibration (document reference TR010035/APP/6.11).</p> <p>Environmental Statement Chapter 6: Air Quality (document reference TR010035/APP/6.6) presents an assessment based on detailed air quality modelling which was undertaken for a number of worst-case receptor locations, including properties close to the Scheme. All predicted air quality concentrations at these locations were below the respective air quality objectives, and the assessment determined that the Scheme would not have a significant effect on local air quality.</p> <p>The property is adjacent to the proposed Skippool Bridge Junction and its access would remain</p>

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
		<p>as existing on the section of Mains Lane that is to be de-trunked.</p> <p>As a result of strategic traffic being diverted onto the bypass, flows along this section of Mains Lane are predicted to be about half of the existing flows. Provision has been made for a protected eastbound right turn lane to serve these properties to be included in the design of the Skippool Bridge Junction and altered arrangement for Old Mains Lane to connect to Mains Lane. In addition, the traffic signal control of Skippool Bridge Junction would provide interruptions in flows from Skippool Junction and Poulton Junction that would assist entering and leaving the properties.</p> <p>Pedestrian access east of the property will remain as existing when this section of Mains Lane becomes de-trunked.</p> <p>Westbound, pedestrian routes would be altered by the proposed layout of Skippool Bridge Junction. However, the proposals for this traffic signal-controlled junction would include full pedestrian/cyclist control to assist in crossing the various parts of the junction. This control system known as a "TOUCAN crossing" means an unsegregated signal-controlled crossing for pedestrians and cyclists, linking cycle track and footway systems on opposite sides of a carriageway and often forms part of a traffic signal-controlled junction. It is accepted that this would be different from using the existing southern footway of Mains Lane, the TOUCAN control would result in a safe and effective means of crossing the carriageways at this junction.</p>
3.7	7. We are concerned about the loss of privacy that will be caused by the creation of the bridges to cross the multitude of roads in the vicinity of our property, these bridges have appeared on the plan without consultation.	<p>At this location where the Scheme is adjacent to the property in question the road alignment is at grade with the existing landform, and no bridges are proposed that would be visible from the property. The only bridge proposed in this vicinity would be the replacement of the existing bridge over Main Dyke (west of the Skippool Service station) with a new bridge for the proposed dual carriageway at the same location. This has not changed since the start of development of the Scheme and was initially indicated in the non-statutory consultation in 2016.</p> <p>In addition, a 2m high noise barrier is proposed between the road and property which is further flanked by woodland planting which would be planted as an enhanced size stock providing additional screening at opening year. Refer to the Environmental Masterplan (document reference TR010035/APP/6.19) Sheet 3 for planting and noise mitigation.</p>
3.8	8. During the consultation process we submitted numerous questions in writing including queries as to the height of the proposed road - to date we have had no reply!	<p>Immediately south-west of Skippool Bridge Junction adjacent to this group of properties, the bypass would be in shallow cutting about 0.5m below the existing ground level. Between the bypass and the properties it is proposed to provide a 2m high environmental barrier at the back of the verge as indicated in the Environmental Master Plan (Document reference TR010035/APP/6.19) Sheet 3 that also show proposed woodland planting to help screen the bypass from the properties. In addition, a screening mound is proposed between the bypass and the field to the south of the properties. Cross sections have been produced, and are available in Appendix A.</p>
RR-004	Mrs S Brown	
4.1	The remit of the new road proposal is to reduce the congestion between Windy Harbour and Skippool; this occurs because of heavy traffic flow during peak hours along the existing single carriageways which is held up by two traffic signal-controlled junctions.	<p>As defined in Highways England's RIS 1 Delivery Plan, the Scheme requirements were to assess the A585 from Windy Harbour Junction to Skippool Junction to address the congestion and safety concerns at the junctions along this stretch. It is acknowledged that although altering the Scheme extent would change the Scheme's Economic Assessment result, the Scheme proposed will still generate economic, operational and environmental benefits without</p>

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
		<p>any extension to the M55 or towards Fleetwood as presented in Planning Statement and National Policy Accordance Section 2.9 (document reference TR010035/APP/7.1). In addition, the Highways England Operations Directorate is conducting investigatory studies for Norcross, the A585/B5269 (Thistleton/Mile Road) and the M55 Junction 3 along Fleetwood Road that are separate from the A585 Windy Harbour to Skippool Improvement Scheme.</p> <p>The Scheme transport model covers a wide area, focusing on the road network to the north of the M55 and to the west of the M6, including the principal settlements as shown in Figure 3.9 in Transport Assessment Section 3 (document reference TR010035/APP/7.4). The area wide changes in traffic volume forecasted for 2037 are presented in Transport Assessment Section 5.2 and Appendix A (document reference TR010035/APP/7.4). The impact of the Scheme on traffic distribution across the highway network has been assessed and can be found in the Scheme Combined Modelling and Appraisal Report (document reference TR010035/APP/7.12)</p>
4.2	<p>The proposed scheme still includes two complicated traffic signal-controlled junctions at Skippool that connect to single carriageways; this would only relocate the current bottlenecks.</p> <p>The planned 4-way traffic signal at Skippool junction will interrupt the flow of traffic and also make it unnecessarily problematic for traffic to turn right when approaching from any direction.</p>	<p>The impact of the Scheme on traffic distribution across the highway network has been assessed and can be found in the Scheme Combined Modelling and Appraisal Report (document reference TR010035/APP/7.12) Appendices F and H.</p>
4.3	<p>Existing local traffic levels and the ability of the surrounding infrastructure to cope with increased traffic flow from the new dual carriageway have not been adequately considered. In the proposed scheme, westbound traffic leaving the fast-moving dual carriageway at Skippool Bridge Junction will have to pass the two new sets of traffic lights before feeding into the three single carriageway roads beyond Skippool Junction. These are:</p> <ul style="list-style-type: none"> a) Breck Road (A588) towards Poulton town centre, b) Skippool Road (B5412) towards Thornton, and c) Amounderness Way (A585) towards Carleton/Cleveleys. <p>All three roads are extensively used by local and commuter traffic and already suffer from lengthy traffic tailbacks during the morning and evening rush hours. Similarly, eastbound traffic on the new dual carriageway heading for the M55 will be held up on the single carriageway Fleetwood Road (A585).</p>	<p>The impact of the Scheme on traffic distribution across the highway network has been assessed and can be found in the Scheme Combined Modelling and Appraisal Report (document reference TR010035/APP/7.12) Appendices F and H.</p>
4.4	<p>Public concerns about increased congestion on Amounderness Way and Fleetwood Road have been acknowledged in the Consultation Report; the response by the planning consultants is that traffic problems beyond the proposed new road are being considered by other departments but are 'outside the scope of the scheme'.</p>	<p>Refer to response in RR-004 (4.1)</p>
4.5	<p>However, there is no reference anywhere to the current daily congestion at peak times on Breck Road or on Skippool Road. These narrow, already busy roads are not wide enough to accommodate a rapid influx of vehicles from the proposed dual carriageway; the inevitable increased traffic tailbacks will affect a more densely populated residential area.</p>	<p>Refer to response in RR-004 (4.1)</p>
4.6	<p>In meeting the remit of speeding up traffic flow to and from Windy Harbour the needs of local residents, local businesses and schools in Thornton, Poulton and Over Wyre have been overlooked. Not all road users in the area are aiming to get to the M55 at high speed; shorter journeys made by local motorists throughout the day are going to be made slower and more difficult with the new road junction proposals. Traffic currently moves freely on the existing roundabout at Amounderness Way/Breck Road/Skipool Road for most of the day and night. Motorists will be held up by the</p>	<p>Refer to response in RR-004 (4.1)</p>

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
4.7	<p>proposed replacement 4-way traffic light-controlled junction and vehicles waiting at red lights will add to air pollution affecting pedestrians, cyclists and local residents.</p> <p>The new road junctions and additional traffic lanes at Skippool will require large areas which are currently turfed to be covered in tarmac. This will add to surface water run-off in a flood risk area where drainage and potential tidal flooding from the adjacent Wyre Estuary is already an issue.</p>	<p>The draft order limits at Skippool junction are not only for the modification of the junction but also to provide landscaping and mitigation as set out in the Environmental Masterplan (document reference TR010035/APP/6.19). Potential for change in existing rainfall runoff patterns and the land drainage regime has been assessed and measures to mitigate Scheme effects are described in the Drainage Design Development Report, appended to the Flood Risk Assessment (FRA) (document reference TR010035/APP/5.2). Surface water runoff will be managed, using a selection of Sustainable Drainage measures, such that rates of runoff from any new impermeable areas will be attenuated back to greenfield rates prior to being discharged into any watercourse. This principal is in accordance with Lead Local Flood Authority and wider planning policy requirements. Climate change resilience has also been factored into the drainage design, in accordance with current good practice guidelines.</p> <p>The potential for Scheme effects on existing tidal flooding potential has been subject to detailed, numerical modelling assessment, in consultation with the Environment Agency, as reported in the FRA (document reference TR010035/APP/5.2). Measures have been incorporated into the design to mitigate the effects of the Scheme on tidal flooding on third party lands.</p>
RR-005	Michael Buckley	
5.1	<p>1. I apply to be registered as an interested party. I have owned and occupied, as my family home. [REDACTED] since December 1979. This property sits at the Skippool Junction. It is bounded to the East by the A588 (Breck Road) and to the North by the A585 (Amounderness Way).</p>	Noted, no further response required.
5.2	<p>2. In 2018, the original house was demolished and was replaced by a 4/5 bed roomed house built to the highest specifications where I am now residing. Planning permission was also obtained at the same time, to build a second four bedroomed house in the site to the North of the existing property. It was, and still is, my aim to enable my son to build this house for himself and family.</p>	Noted, no further response required
5.3	<p>3. In principle, I do not object to the Improvement Scheme. However, its implementation will, in my submission, significantly affect both the value of the property and, also, my enjoyment of it. In particular:</p> <p>a. The creation of a third lane or slipway on the A588 on the approach to the Skippool junction will inevitably bring the traffic closer to my property with an increase in noise, exhaust fumes and loss of privacy</p>	<p>Environmental Statement Chapter 6: Air Quality (document reference TR010035/APP/6.6) presents an assessment based on detailed air quality modelling which was undertaken for a number of worst-case receptor locations, including properties close to the Scheme. All predicted air quality concentrations at these locations were below the respective air quality objectives, and the assessment determined that the Scheme would not have a significant effect on local air quality.</p>
5.4	<p>b. While the proposal to replace the roundabout at the centre of the junction with traffic lights will be welcomed by, and safer for, pedestrians, cyclists, the disabled etc., it again, in my submission, will have a significant impact on my enjoyment of my property. In particular,</p> <p>i. the slowing of the vehicles (especially large commercial vehicles) on the approach, followed by the idling of engines while stationary, and then their acceleration as they move away, is likely to cause a significant increase in fumes, noise and vibrations, even if (which is doubtful) there is a reduction in the overall traffic. The fact is that this remains the main route to Fleetwood, Thornton, Cleveleys and the North Fylde coast where a continual stream of new houses are being constructed to meet local needs.</p> <p>ii. The build-up of traffic on the A588 backing up from the traffic lights when showing red is likely result, especially at busy times, in it becoming even more difficult, and taking longer to exit my property than at the present time</p>	<p>The new slip road/junction improvements would have a negligible effect on road traffic noise in this area due to these levels being mitigated to a minimum and below a level where significant adverse effects on health would occur through the use of low noise surfacing on both the new slip and across the proposed new junction alignment. No effects as a result of vibration are anticipated during operation. Note: Privacy is covered within (response 5.5 below).</p> <p>At Skippool junction the queue length results from the modelling show that the queues slightly exceed the maximum expected free-flow queue length. However, the queues occur only briefly and clear within each cycle. Therefore, there is a minimal risk of this causing blocking back across any upstream junctions and causing increased delays to exiting your property.</p>

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
5.5	iii. The scheme also envisages taking over land on the Northern boundary. This is again likely to destroy part of the existing hedgerow which provides much need privacy and a natural shield from noise and fumes.	<p>The northern boundary of this property adjoins Amounderness Way at the south-west corner of Skippool Junction. The existing privet hedgerow would not be affected by the proposed changes to the layout at Skippool Junction. The only part of the property that might be affected is the far north-east corner that is at the south end of the culvert carrying Horsebridge Dyke under Skippool Roundabout (although it is noted that this part of the land is over the top of the culvert that is a Highways England asset). It should be noted that this area was registered in February 2019 with a "possessory title".</p> <p>A review undertaken by Highways England and Department for Food and Rural Affairs has found that green barriers, such as hedgerow, have little effect on reducing air quality concentrations https://uk-air.defra.gov.uk/library/reports.php?report_id=966.</p> <p>The operational noise assessment has not accounted for road traffic noise attenuated by hedgerows to present a worst-case scenario, as the amount of noise which can be reduced can vary depending upon the season and the density of the foliage. With regard to the use of shrubs or trees as a noise barrier DMRB HD213/11 paragraph 4.5 states "<i>the use of shrubs or trees as a noise barrier has been shown to be effective only if the foliage is at least 10m deep, dense and consistent for the full height of the vegetation.</i>" This is not the case at this property.</p> <p>Regarding privacy, the construction of the Scheme would not result in any loss of vegetation within the property's curtilage which falls within the DCO order limits, therefore there would be no loss of privacy against the baseline situation.</p>
5.6	iv. The scheme also appears to envisage acquiring part of my land at the North East corner of the property. While I feel, in view of the overall public interest, that I cannot object in principle to this and am prepared to enter into negotiations for an appropriate fair price, it does emphasise the extent to which this scheme encroaches on my land, causing loss of privacy, noise and all the injurious effects of proximate heavy traffic upon my home and property.	<p>The Applicant is in ongoing discussions with Mr Buckley regarding the parcel in the North East corner, adjacent to Skippool junction. The area of land referred to is a small triangular part of land that is located above the existing culvert carrying Horsebridge Dyke under the A585. Part of this land has recently been registered as a Possessory Title and appears to have been fenced off from the adjoining highway land since at least the early 1990s.</p> <p>Works to replace the existing culvert require this area of land to be acquired and the eastern 15m of the existing hedgerow fronting the road and a single tree in the land would be removed as part of these works. Discussions will continue with a view to agree a price for the land affected by the Scheme.</p>
5.7	4. In all the circumstances, the implementation of the scheme will have a significant effect on the value of my land and the enjoyment of my property. I submit, however, some of this could be reduced by the construction of a suitable barrier or fence round the North and Easterly boundaries to create privacy and reduce traffic noise and fumes. These types of measures were taken some years ago to protect properties further along the A585 at the junction of West Drive and Bourne Road. I would therefore, at this stage urge that the scheme do include appropriate measures by way of screening, fences etc. to reduce the adverse effect which it will undoubtedly have upon my property. This is, of course, without prejudice to my right at the appropriate time to seek compensation for the reduction in value to my property and for the injurious effect it is likely to have.	<p>It should be noted that the Scheme does not need to remove the western section of hedge fronting Amounderness Way (about 18m in length) and it is noted that there is a retaining wall, septic tank and garden shed close to that section of hedge.</p> <p>Where the removal of the existing hedge and tree is required by the Scheme this can be replaced with a section of fence with the agreement of the landowner as "accommodation works".</p>
RR-006	Cadent	
6.1	Representation by Cadent Gas Limited (Cadent) to the A585 Windy Harbour to Skippool Improvement Scheme Development Consent Order: Cadent is a licensed gas transporter under the Gas Act 1986, with a statutory responsibility to operate and maintain the gas distribution networks in North London,	Noted, no further response required

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
	<p>Central and North West England. Cadent's primary duties are to operate, maintain and develop its networks in an economic, efficient and coordinated way. Cadent wishes to make a relevant representation to the A585 Windy Harbour to Skippool Improvement Scheme DCO in order to protect its position in light of infrastructure which is within or in close proximity to the proposed DCO boundary. Cadent's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the order limits including should be maintained at all times and access to inspect such apparatus must not be restricted.</p>	
6.2	<p>The documentation and plans submitted for the above proposed scheme have been reviewed in relation to impacts on Cadent's existing apparatus located within this area, and Cadent has identified that it will require adequate protective provisions to be included within the DCO to ensure that its apparatus and land interests are adequately protected and to include compliance with relevant safety standards.</p>	
6.3	<p>Cadent has low, and medium pressure gas pipelines and associated below or above ground apparatus including a number of gas governors located within the order limits which are affected by works proposed and which may require diversions subject to the impact.</p>	
6.4	<p>As a responsible statutory undertaker, Cadent's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. Adequate protective provisions for the protection of Cadent's statutory undertaking have not yet been agreed or discussed between parties.</p>	
6.5	<p>Cadent wishes to reserve the right to make further representations as part of the examination process but in the meantime will seek to engage with the promoter with a view to reaching a satisfactory agreement.</p>	
RR-007	Environment Agency	
7.1	<p>Flood Risk The scheme is partly located within Flood Zone 3 (high probability of flooding) on the Environment Agency Flood Map for Planning. The submitted Flood Risk Assessment (document reference TR010035/APP/5.2, Rev 0, dated October 2018) considers this development to be 'essential infrastructure'. According to the National Policy Statement for National Networks, applications proposing essential infrastructure within Flood Zone 3, must demonstrate that the Exception Test is passed. This includes the requirement for the development to be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. We are pleased that some of the concerns and issues raised by the Environment Agency during pre-application consultation have been considered and addressed. However, there are aspects relating to the assessment and mitigation of flood risk impacts that will require further consideration and remain of concern to us. If these concerns are overcome, we consider it is likely to be necessary to include a specific requirement within the DCO to ensure that the final agreed flood mitigation measures will be implemented. We have engaged with Highways England's consultants on several occasions from an early stage in the process to discuss flood risk in particular. However, there are still some issues relating flood risk that will need to be addressed and further detailed discussion and consultation with us will be required.</p>	<p>Revision 1 of the Flood Risk Assessment (FRA) (document reference TR010035/APP/5.2 - Rev 1) will be issued to the Inspectorate at Deadline 2.</p>

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
7.2	<p>Compensatory storage scheme</p> <p>The proposed compensatory storage areas that are proposed to mitigate for the temporary increase in flood risk from the Main Dyke during construction of the Scheme will need be developed into detailed design. The compensatory storage area has only been modelled at present and as yet, to the best of our knowledge has not been developed into detailed design.</p> <p>We will need to see detailed design proposals that we could agree will function as intended and that would allow us to permit the works under the Environmental Permitting Regulations.</p>	<p>The Scheme is not currently at detailed design stage and a contractor is not presently engaged. However, the Record of Environmental Actions and Commitments (REAC) (document reference TR010035/APP/7.3 – Rev 1) and FRA (document reference TR010035/APP/5.2 – Rev 1) will be updated at Deadline 2 to include commitments regarding: maintaining the Environment Agency’s access i.e. an 8 metre wide easement from Main River banks, ensuring bank stability, maintaining levels / avoiding sudden dips in ground levels.</p> <p>Proposals for the compensation areas are to be agreed with the Environment Agency and this commitment will be secured through inclusion in the REAC (document reference TR010035/APP/7.3).</p>
7.3	<p>Replacement culvert – Horsebridge Dyke</p> <p>Clarification on the proposed replacement Horsebridge Dyke culvert needs to be provided and design of any replacement agreed with us.</p> <p>If a FRAP for this structure is to be dis-applied, detailed info needs to be submitted with the DCO application. We do not consider it to be the best approach to go down the disapplication route.</p>	<p>Further detail on the Skippool Clough (Horsebridge Dyke) culvert will be appended to the updated Flood Risk Assessment (document reference TR010035/APP/5.2 - Rev 1) within Section 5.3 of a modelling annex submitted at Deadline 2.</p> <p>The Applicant is not seeking to disapply any permits as part of the Scheme.</p>
7.4	<p>Modelling and Investigation</p> <p>We have not been given the opportunity to review the ‘enhancements’ to the tidal model, but we are aware that Highways England’s consultant is currently working on this.</p> <p>An Environment Agency 2D only model of the River Wyre Estuary has been enhanced and used to assess both the risk of tidal flooding to the scheme and any change in tidal flood risk to third parties. On the basis that we have not had been provided with the opportunity to review the enhanced model, we have to take the findings and assumptions made in the report at face value.</p> <p>As such, we need to be provided with opportunity to review the enhanced tidal modelling that has been undertaken prior deciding the application.</p>	<p>The tidal model was sent to the Environment Agency in February 2019 for comment. Comments received from the Environment Agency on the tidal model together with responses from the Applicant will be appended to the updated FRA (document reference TR010035/APP/5.2 – Rev 1) submitted at Deadline 2.</p>
7.5	<p>Climate change allowances</p> <p>We consider that climate change allowances should be revisited to ensure that a suitable and up to date evidence base is used in determining whether the development will be safe for its lifetime and to inform detailed design of the project. The following issues will need to be addressed:</p> <p>The allowances need updating to reflect UK Climate Projections 18 (UKCP18), which has recently been published.</p> <p>The H scenario should be considered and assessed given the safety critical aspects of the scheme.</p> <p>In relation to the above, the lifetime of the development should be clearly stated. In addition to this, since the modelling for this project was undertaken, the UKCP18 have been released. The new guidance that has been released suggests that those proposing new infrastructure projects with a lifetime of at least 100 years should assess the impact of both the current allowance in ‘Flood risk assessments: climate change allowances’ and the 95th percentile of UKCP18 ‘RCP 8.5’ (Representative Concentration Pathway (related to the effect of greenhouse gasses on climate)) scenario (high emissions scenario) standard method sea level rise projections of UKCP18. The sea level rise allowances beyond 2100 should be found by extrapolating the UKCP18 dataset.</p> <p>The above is in line with National Policy Statement for National Networks 4.42 which states, “The applicant should take into account the potential impacts of climate</p>	<p>An additional UKCP18 sensitivity test has been run in the tidal model and updated results will be presented within the updated Flood Risk Assessment (document reference TR010035/APP/5.2 – Rev 1) at Deadline 2. The methodology that has been followed was agreed with the Environment Agency on the 3 April 2019.</p> <p>Text regarding the potential lifetime of the development will be included within the updated Flood Risk Assessment (document reference TR010035/APP/5.2 – Rev 1) submitted at Deadline 2.</p>

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
	<p>change using the latest UK Climate Projections available at the time and ensure any environment statement that is prepared identifies appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure. Should a new set of UK Climate Projections become available after the preparation of any environment statement, the Examining Authority should consider whether they need to request additional information from the applicant.”</p> <p>The H++ allowances apply when assessing flood risk for developments that are very sensitive to flood risk and with lifetimes beyond the end of the century, for example, infrastructure projects or developments that significantly change existing settlement patterns. Due to the nature of this proposal, we therefore also suggest that the H scenario is assessed, as set out in the guidance. This scenario will be useful to establish if there are any cliff edge effects, where the management of the infrastructure may need to change, or a managed adaptive approach be put in place. This is needed in order for us to ensure that this infrastructure will be safe for its lifetime, which is a key part of passing the Exception Test.</p> <p>Section 7.1.4 of the submitted FRA states, “An assessment was carried out to ensure that the proposed development was not at increased risk of flooding over its lifetime due to climate change, this used the 3 climate change scenarios as described in Section 3 for the 1% AEP event: 30%, 35% and 70% fluvial inflows”. The use of the 70% upper Climate Change Allowance for North West River Basin District to cater for 2080’s (2070-2115) scenario therefore suggests the anticipated lifespan of scheme is minimum of 100 years. However, it is not clear what the proposed lifetime of this scheme is, as it is not explicitly stated.</p>	
7.6	<p>Environmental permitting – flood risk activities</p> <p>Outside of the DCO process, environmental permits will be required for certain elements of this development where flood risk activities will take place:</p> <ul style="list-style-type: none"> on or within 8 metres of a main river (16 metres if tidal) on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal) on or within 16 metres of a sea defence involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it’s a tidal main river) and without having planning consent in place. <p>In particular, flood risk activity permits will be required several permanent structures within 8 metres of the main rivers, Horsebridge Dyke and Skippool Creek (Main Dyke): the replacement Horsebridge Dyke culvert, replacement Skippool Bridge and surface water outfalls.</p> <p>Permits will also be required for any other flood risk activities which meet the above criteria for any temporary works or structures during construction.</p>	<p>Flood risk activity permits for all relevant temporary (construction stage) activities and for permanent works would be prepared in consultation with the Environment Agency by the contractor during the detailed design stage of the Scheme. The Scheme is currently at the preliminary design stage and there is currently no contractor on board.</p> <p>The Applicant has outlined to the Environment Agency at a meeting on the 1 April 2019 that they are not seeking to disapply any permits required for the Scheme. The Applicant is also in discussions with the EA to agree a Statement of Common Ground which will deal with the process and timescales for securing the permits.</p>
7.7	<p>Contaminated Land</p> <p>We have reviewed the submitted information, including ES Chapter 13: Geology and Contaminated Land, and we are satisfied with the details covered in relation to land contamination that may impact controlled waters.</p> <p>A review of our mapping and information confirms that there are no areas that are classified as contaminated land, or any indication that landfills or contaminated made ground exists within the DCO boundary.</p>	Noted – no further response required.

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
	<p>We would agree that there is a potential for some of the development to be on moss that is known to be methane generating.</p> <p>We would agree with the recommendation that no actual monitoring of the development is necessary, as the values of lead, copper and zinc in ground-waters are regarded as background.</p> <p>Insofar as it relates to impacts on controlled waters from land contamination, there is no requirement for any further investigation or reporting upon this development.</p> <p>However, we are supportive of the inclusion of Requirement 6 - Contaminated land and groundwater, within the draft DCO, to manage unexpected land contamination.</p>	
7.8	<p>Groundwater</p> <p>We have reviewed the submitted information, including ES Chapter 13: Geology and Contaminated Land and Chapter 12: Road Drainage and the Water Environment, and we are satisfied with the details covered in relation to groundwater.</p> <p>Most of the groundwater related activities are covered by permits that are required outside of the DCO process. It is the Highways Authority who have the primary responsibility to control the discharge of highways run-off and include adequate pollution prevention techniques. However, infiltration of run-off to ground is not a major component of the scheme with the water quality impact assessments focusing on surface waters.</p> <p>The development is anticipated to be subject to passive de-watering in the Lodge Lane crossing. The potential impacts of this have been quantified within ES Chapter 12. The outcomes of this are noted, and there are no further issues to raise on this matter.</p> <p>We welcome the inclusion of Requirement 4 – Construction and Handover Environmental Management Plan and also Requirement 6 - Contaminated land and groundwater of the draft DCO, to manage unexpected land and water contamination. Environmental permits for discharging treated trade/sewage effluent to ground waters may be required for welfare facilities during the construction phase.</p>	<p>Noted.</p> <p>All permits required for the Scheme for temporary (construction stage) activities including for welfare would be prepared in consultation with the Environment Agency by the contractor during the detailed design stage of the Scheme. The Scheme is currently at the preliminary design stage and there is currently no contractor presently engaged.</p> <p>The Applicant has outlined to the Environment Agency at a meeting on the 1 April 2019 that they are not seeking to disapply any permits required for the Scheme. The Applicant is also in discussions with the EA to agree a Statement of Common Ground which will deal with the process and timescales for securing the permits.</p>
7.9	<p>Water Quality</p> <p>We have considered the potential impacts on surface water quality and we are satisfied with the details covered in the ES Chapter 12: Road Drainage and the Water Environment. Provided the pollution prevention measures are implemented as proposed we have no concerns.</p> <p>We have also reviewed the Outline Construction Environmental Management Plan and we have no issues to raise in this regard. We support the inclusion of Requirement 4 – Construction and handover environmental plan and we are happy to review details regarding water quality in relation to the discharge of this requirement. Environmental permits for discharging treated trade/sewage effluent to surface waters may be required for welfare facilities during the construction phase.</p>	<p>Noted. All permits required for the Scheme for temporary (construction stage) activities including for welfare would be prepared in consultation with the Environment Agency by the contractor during the detailed design stage of the Scheme. The Scheme is currently at the preliminary design stage and there is currently no contractor on board.</p> <p>The Applicant has outlined to the Environment Agency at a meeting on the 1 April 2019 that they are not seeking to disapply any permits required for the Scheme. The Applicant is also in discussions with the EA to agree a Statement of Common Ground which will deal with the process and timescales for securing the permits.</p>
7.10	<p>Aquatic Environment – Ecology and Geomorphology</p> <p>We have reviewed the submitted information, including ES Chapter 8: Biodiversity and the Water Framework Directive Assessment (Volume 5), and we are satisfied with the details covered in relation to aquatic ecology and geomorphology.</p> <p>We welcome the inclusion of Requirement 7 – Protected species, within the draft DCO, which allows for the identification and appropriate protection of protected species.</p>	<p>Noted – no further response required.</p>
7.11	<p>Environmental Permitting – Waste</p> <p>We have reviewed the submitted information, including ES Chapter 14: Materials, and</p>	<p>Noted.</p>

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
	<p>our comments previously given to Highways England's consultants (in December 2018), in relation to the draft Consents and Agreements Position Statement, regarding waste permitting still apply.</p> <p>The borrow pits are identified within the DCO boundary and so are part of the scheme and would be considered as 'site won' material. Although the scheme area is largely rural/agricultural, unknown previously deposited waste or contaminated land may be present and measures to deal with this waste need to be in place. As part of the development, two houses are proposed to be demolished and it is stated that the waste from this demolition will be used on site. Waste materials from demolition works of this nature are not suitable for use in constructing this highway and disposal routes should be set up for the waste material. It has not been identified if the imported material to be used in the scheme would require a permit.</p> <p>Recycled and secondary aggregate would have to have been produced to Waste and Resources Action Programme (WRAP) protocol to not be considered as waste. If not then a permit may be required.</p> <p>Given the above, we welcome further discussion with the developer/consultants to ensure they are in compliance with Environmental Permitting Regulations and pollution does not result.</p> <p>We are supportive of the inclusion of Requirement 6 - Contaminated land and groundwater, within the draft DCO, to manage unexpected land contamination</p> <p>Given the above, we welcome further discussion with the developer/consultants to ensure they are in compliance with Environmental Permitting Regulations and pollution does not result.</p> <p>We are supportive of the inclusion of Requirement 6 - Contaminated land and groundwater, within the draft DCO, to manage unexpected land contamination.</p>	<p>Chapter 14: Materials (document reference TR010035/APP/6.14) states that demolition waste would be used 'when suitable' and that worst case it would be taken to landfill. All permits required for the Scheme for temporary (construction stage) activities would be prepared in consultation with the Environment Agency by the contractor during the detailed design stage of the Scheme. The Scheme is currently at the preliminary design stage and there is currently no contractor on board.</p> <p>The Applicant has outlined to the Environment Agency at a meeting on the 1 April 2019 that they are not seeking to disapply any permits required for the Scheme. The Applicant is also in discussions with the EA to agree a Statement of Common Ground which will deal with the process and timescales for securing the permits.</p>
7.12	<p>Protective Provisions</p> <p>Highways England did not seek disapplication of any of the Environment Agency's consenting regimes in the version of the draft DCO submitted with the application, therefore our initial view is that the protective provisions for our benefit included in the draft Order are unnecessary and would result in duplication. We are continuing to discuss this issue with Highways England and their consultant and will comment in further detail in our written representations.</p>	<p>The Applicant is not seeking to disapply any permits as part of the Scheme.</p>
7.13	<p>Consents and Agreements Position Statement</p> <p>The version of this document is the same as that which we have recently provided advice on to Highways England's consultants. We recommend that the document is updated in view of our comments, as there were several matters which needed clarification in regard to environmental permitting outside of the DCO.</p>	<p>The Consents and Agreements Position Statement (document reference TR010035/APP/5.5 – Rev 1) will be updated and reissued to the Planning Inspectorate at Deadline 2 which takes account of all comments from the Environment Agency</p>
RR-008	Eversheds Sutherland (International) LLP (Eversheds Sutherland (International) LLP) on behalf of Carrington Group Limited & Carrington Group Mains Lane Limited	
8.1	<p>Amenity of Consented Residential Development</p> <p>Carrington has planning permission for a 9-unit residential development in close proximity to the scheme. It objects to the route of the new road and seeks its realignment further away from its development site so as to leave a reasonable distance between the road and the permitted dwellings as the noise caused by the construction and use of the new road will undoubtedly have a significant adverse impact on the amenity of the future residents.</p>	<p>Three corridors (online, northern and southern) were considered during the Applicant's Options Stage. A total of 9 options were considered and 8 were discounted for a variety of reasons including: insufficient capacity for future traffic growth, increase in amount of land take required, close proximity to the Ramsar site and Special Protection Areas potentially increasing Habitats Directive compliance risks, a decrease in potential air quality and noise benefits and the close proximity and greater impact on Main Dyke and associated flood zones. The preferred route was announced in October 2017 and was chosen through providing a reduction in congestion, journey times and improvement in safety compared to other options. If the alignment of the bypass in the vicinity of the 9 house development were moved further away from this development it would be moved further into the Main Dyke flood plain and would require the</p>

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
		<p>purchase of additional properties in Skippool as a result of that realignment.</p> <p>The noise assessment in Chapter 11 of the Environmental Statement (document reference TR010035/APP/6.11) provides details of the noise impact of the Scheme on nearby sensitive receptors. On the basis of this assessment the Applicant does not consider there to be a significant adverse impact on the amenity of the future residents.</p>
8.2	<p>Preventing Consented Development Carrington also objects to the DCO for the reason that the Scheme is currently preventing the delivery of the approved housing due to an inability to obtain approval of the drainage strategy which Highways England have failed to withdraw their objection to, despite the fact that it would not adversely affect the delivery of the Scheme.</p>	<p>Since the relevant representation has been submitted, condition 11 relating to the planning consent for the 9-unit residential scheme has been discharged allowing the development works to commence. The Applicant is actively working with Carrington to resolve the final issue around discharging condition 12 relating to the planning consent.</p>
8.3	<p>Sterilisation of Part of Development Site Part of Carrington's affected site comprises land which is intended to form a future phase of development which could accommodate over 150 houses, which will provide an important contribution to Fylde meeting its housing targets. The Scheme will have the effect of sterilising this part of the site by removing the existing agricultural access (and thereby removing the existing agricultural use of the land), and by removing the possibility of a future access for the site to connect into the Scheme. In effect, the Scheme, land-locks this part of the site and sterilises it for its current use and for any future uses. Unless and until the Scheme is amended to maintain the existing access, and to provide an improved access for the future development of this part of Carrington's site (which can be achieved on a reasonable basis), Carrington maintains its objection to the DCO on the basis of the sterilisation of the site.</p>	<p>The Applicant does not agree that the Scheme will cause Carrington's land to be sterilised. The Applicant is not aware of a planning application having currently been submitted or determined by Fylde Borough Council (the Applicant is aware that Carrington has undertaken pre-application engagement with the Council for up to a 150 unit development but this has not progressed). However, the Applicant has allowed for the provision of an access from the A585 as detailed in the Street Rights of Way and Access Plans (document reference TR010035/APP/2.4), which could accommodate a future planning application, if made by Carrington Group Ltd.</p>
8.4	<p>Insufficient Funding Carrington objects on the basis that Highways England has not demonstrated that it has sufficient funds to meet the compensation liabilities that will arise, and therefore it has not demonstrated that it has the funds and resources to deliver the Scheme.</p>	<p>The Applicant has submitted a Funding Statement (document reference TR010035/APP/4.2) as part of the application documentation which demonstrates that sufficient funding is in place to deliver the Scheme.</p>
8.5	<p>Breach of Human Rights In exercising its powers Highways England must act in accordance with the Human Rights Act 1998 and must act proportionately. The acquisition of part of Carrington's land is an interference with Carrington's rights, and should only interfere substantially and seriously with such rights where it is justified and proportionate to do so, however, it has been demonstrated that with relatively minor and reasonable adjustments to the route, the harm to Carrington can be reduced or even avoided. Carrington therefore objects to the DCO on the basis of the unlawful interference with Carrington's rights.</p>	<p>In determining the extent of the land and new rights required to enable delivery of the Scheme, the Applicant has had regard to the impact of the acquisition on the human rights of the affected landowners, including Carrington. The Applicant is content for the reasons set out in the Statement of Reasons (document reference TR010035/APP/5.2) that the proposed acquisition is proportionate and justified having regard to the impact on affected landowners and the public benefits which will be delivered by the Scheme. It accordingly considers that there is a compelling case in the public interest for the acquisition and is satisfied that the condition in section 122(3) of the Act is met.</p>
8.6	<p>Carrington remains ready and willing to engage further following this objection and hopes that it can work with Highways England to address the above issues.</p>	<p>Noted – no further response required.</p>
RR-009	Fylde Borough Council	
9.1	<p>The Local Planning Authority (LPA) provided comments to Highways England on the pre-application Windy Harbour to Skippool Improvement Scheme by letter dated 3rd May 2018 (LPA reference MDE/ENQ/18/0091). The proposal set out in the application for examination is, aside from the replacement of roundabouts at the Poulton and Singleton junctions with signalised junctions and alterations to the landscaping strategy, substantially the same as the pre-application scheme. In summary, the LPA considers the main issues which fall within its remit to comment on to relate to the following topics:</p>	<p>Noted – no further response required.</p>

Reference Number	Comment from Relevant Representation	Response to Relevant Representation												
9.2	<p>Principle of development: Policy T1 and paragraphs 11.35-11.37 of the Fylde Local Plan to 2032 state that the delivery of strategic highway improvements within the borough, including the “A585 Skippool – Windy Harbour Improvements”, will be supported. The LPA recognises the scheme’s benefits in terms of its potential to alleviate traffic congestion and improve air quality along this corridor of the A585 (Garstang New Road and Mains Lane). Accordingly, the LPA is supportive of the principle of development, subject to site-specific considerations relating to the scheme’s detailed design.</p>	<p>Noted – no further response required.</p>												
9.3	<p>Visual/landscape issues: Subject to the submission of a detailed soft landscaping scheme to identify the precise size, type, species, siting, planting distances and programme of planting of trees, hedges and shrubs (including provisions for a 10 year replacement period and ongoing maintenance), the LPA agrees that the indicative landscaping scheme set out in document 6.19 of the Environmental Statement (ES) will provide appropriate compensation for trees and hedgerows to be removed in connection with the development, and suitable screening of the bypass. The LPA is concerned that the present design of the “Grange Footbridge” (images of which are shown in viewpoint 9 of document 6.9 to the ES) would result in an overtly utilitarian and inherently urban appearance to the structure and would suggest that opportunities be explored to provide a design solution that is more sympathetic to this rural setting. For example, by introducing a mounded embankment to conceal the return of the long-ramped accesses. • Viewpoint 10 of document 6.9 to the ES illustrates views across the Lodge Lane bridge from the south. However, the LPA considers that the most important views of this feature (i.e. those to show the visual impact of the cutting, retaining wall and acoustic fence) will be from the north side of the bridge. Accordingly, the LPA considers that an additional viewpoint and photomontage is required from the northern end of the Lodge Lane bridge looking south back towards the cutting.</p>	<p>A detailed landscape scheme would be prepared by the contractor and consulted upon to discharge Requirement 5 in the draft DCO prior to construction commencing. There would be a 5-year rectification period (including management and maintenance) included as standard practice – refer to 12F within the Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3). After this time soft landscaping within the Applicant’s land ownership would be maintained in accordance with a maintenance schedule which would be prepared prior to the completion of the initial 5-year rectification period.</p> <p>Woodland planting adjacent to the Grange Footbridge structure has been included where physical space requirements allow. In addition, supplementary linear hedgerows with occasional trees are also included to integrate with the adjacent landscape features. Planting is presented on the Environmental Masterplan (document reference TR010035/APP/6.19). An additional commitment will be included within the Record of Environmental Actions and Commitments document reference TR010035/APP/7.3 – Rev 1) at Deadline 2 to increase the planting stock size in this area. Additional earthworks and landscape screening proposals for Grange footbridge could be developed during detailed design stage by the contractor, where space permits (however this is likely to reduce the amount of proposed woodland).</p> <p>All representative viewpoints were agreed with Wyre Council in December 2017 and Fylde Borough Council in September 2017. An additional photomontage at this location would not change the conclusions reached within the assessment presented in Environmental Statement Chapter 9: Landscape (document reference TR010035/APP/6.9). Following the meeting on 5 March 2019 an extract from the Scheme flythrough has been provided to the Council.</p>												
9.4	<p>Noise: The close proximity of the bypass to neighbouring dwellings – particularly those surrounding the Lodge Lane bridge – would give rise to a significant increase in noise disturbance to properties at North Lodge, The Manor, Barnfield Manor and Singleton Hall which would diminish living conditions for the occupiers of those dwellings. The main concern is that the dwellings affected by an increase in noise level from road traffic have, historically, benefited from a low background sound level due to their rural location. Therefore, while the actual predicted noise level may not be defined as being detrimental to health, the difference between current and predicted level is significant. Document 6.11 of the ES indicates that the dwelling at North Lodge qualifies for sound insulation under the Noise Insulation Regulations scheme. However, clarification is required as to why this is the only property within the group which qualifies given the bypass’ close proximity to other dwellings in the same area. The harmful effects identified above must, however, be weighed against: (i) the wider benefits of the scheme; (ii) the benefits arising from noise to other dwellings on Mains Lane which would occur from the reassignment of traffic away from the A585; and (iii) the effectiveness of the attenuation measures proposed in order to avoid increased</p>	<p>North Lodge and The Manor (Singleton Hall) qualify for noise insulation under the requirements set out under Regulation 3 of the Noise Insulation Regulations (NIR) as there is a predicted road traffic noise level greater than or equal to 68 decibels (dB) LA10 18 hour when rounded to the nearest whole decibel.</p> <p>The properties listed in Fylde’s comment are predicted to experience a significant effect and this is presented in Table 11.35 of Environmental Statement Chapter 11: Noise and Vibration (document reference TR010035/APP/6.11). The significance is as a result of the change in the existing acoustic context. Extract from Table 11.35:</p> <table border="1" data-bbox="1626 1675 2792 1940"> <thead> <tr> <th data-bbox="1626 1675 1822 1839" rowspan="2">Receptor (or group of receptors)</th> <th colspan="2" data-bbox="1834 1675 2154 1734">Magnitude of Impact</th> <th data-bbox="2166 1675 2404 1839" rowspan="2">Conclusion of Significance of Environmental Effect</th> <th data-bbox="2415 1675 2792 1839" rowspan="2">Justification of Significance conclusion</th> </tr> <tr> <th data-bbox="1834 1743 2000 1839">Short Term</th> <th data-bbox="2012 1743 2154 1839">Long Term</th> </tr> </thead> <tbody> <tr> <td data-bbox="1626 1843 1822 1940">Noise sensitive receptors</td> <td data-bbox="1834 1843 2000 1940">Major / Moderate Adverse</td> <td data-bbox="2012 1843 2154 1940">Moderate Adverse</td> <td data-bbox="2166 1843 2404 1940">Significant (Adverse)</td> <td data-bbox="2415 1843 2792 1940">Large increase in road traffic noise to a level just below a</td> </tr> </tbody> </table>	Receptor (or group of receptors)	Magnitude of Impact		Conclusion of Significance of Environmental Effect	Justification of Significance conclusion	Short Term	Long Term	Noise sensitive receptors	Major / Moderate Adverse	Moderate Adverse	Significant (Adverse)	Large increase in road traffic noise to a level just below a
Receptor (or group of receptors)	Magnitude of Impact			Conclusion of Significance of Environmental Effect	Justification of Significance conclusion									
	Short Term	Long Term												
Noise sensitive receptors	Major / Moderate Adverse	Moderate Adverse	Significant (Adverse)	Large increase in road traffic noise to a level just below a										

Reference Number	Comment from Relevant Representation	Response to Relevant Representation				
	noise reaching levels that are detrimental to health.	located in the vicinity of Lodge Lane underpass				Significant Observed Adverse Effect Level (SOAEL) with adverse changes to the acoustic context with road traffic noise becoming more apparent
9.5	Air quality: The Council has undertaken air quality monitoring at the Singleton Crossroads (also known as “Five Lane Ends”) since January 2017. This monitoring indicates that current, mean NOx levels in this location are very close to the EU maximum of 40 mg/m ³ . The proposed bypass has the potential to reduce this figure by lessening the amount of standing traffic and, ultimately, preventing the designation of an Air Quality Management Area.	The results of the NIR assessment are presented within the Environmental Statement Appendix 11.3: NIR Assessment (document reference TR010035/APP/6.11.3) and the Changes and Corrections Document (document reference TR010035/APP/7.11) which will be submitted at Deadline 2.				
9.6	Heritage: The cluster of buildings at Singleton Hall (including the grade II listed ice house), North Lodge, The Manor and Barnfield Manor have significance as heritage assets (both designated and non-designated). The close proximity of the bypass to this group of buildings would have an adverse impact on the setting of these heritage assets by urbanising their rural setting within open fields and separating North Lodge from the rest of the cluster by severing the original driveway link to Singleton Hall. These effects could, to some extent, be mitigated by the applicant making a financial contribution to the Richard Dumbreck Trust for a “Heritage Improvement Scheme” involving the provision of pathways through the Singleton Park area to allow enhanced public views of the building cluster. A 2m high noise barrier is proposed to the east of the Lodge Lane bridge, along the southern edge of the bypass where it flanks Barnfield Manor and The Manor. This noise barrier is shown as an acoustic fence backed by low-level planting on viewpoint 10 of document 6.9 to the ES. The LPA considers that it would be preferable for this fence to be replaced with an alternative boundary treatment (e.g. a red brick wall) in order to afford a more sympathetic relationship with the vernacular of neighbouring buildings	The assessment presented in Chapter 7: Cultural Heritage (document reference TR010035/APP/6.7) determined that the setting of the designated Grade II listed Ice House at Singleton Hall would experience a moderate adverse effect as a result of the Scheme. The assessment also determined that the low value non-designated assets; Singleton Hall and Barnfield Manor would not experience a significant effect as a result of the Scheme. North Lodge and The Manor are not designated heritage assets and are not noted locally as heritage assets based on information received from the Lancashire Historic Environment Record (HER). As part of the assessment presented in Chapter 7: Cultural Heritage (document reference TR010035/APP/6.7), appropriate mitigation has been proposed, including additional tree screening. These proposals have been deemed appropriate by Historic England, as the statutory consultee for designated assets such as the Ice House. The Applicant is actively working with the Richard Dumbreck Trust to identify opportunities to work together on heritage improvement opportunities in the local area. The Applicant notes the preference for a red brick wall or alternative boundary treatment at this location. The acoustic timber fence shown on Viewpoint 10 is illustrative of the preliminary design. A commitment will be included within Revision 1 of the Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3 – Rev 1) to state ‘The specification of the material of the acoustic fencing required along the Singleton Hall access road will be discussed with Fylde Borough Council prior to construction commencing’. Revision 1 of the Record of Environmental Actions and Commitments will be submitted at Deadline 2.				
9.7	Land Bridge: The LPA is disappointed that the pre-application option of introducing a “land bridge” over the Lodge Lane crossing has not been brought forward in the application as this would have delivered multiple benefits including: (i) a more extensive and sympathetic means of screening the cutting; (ii) allowing the retention of the original access drive to Singleton Hall adjacent to North Lodge and reducing effects on the setting of heritage assets; and (iii) a more effective and aesthetically pleasing means of noise	The Applicant completed an assessment and the land bridge was found not to be the best performing option. The reasons for discounting were the long term maintenance of the structure, construction complexities, the possible impact on adjoining landowners and cost. The environmental benefits of a land bridge structure compared to a conventional structure were negligible for the setting of heritage assets and ecology. The assessment concluded that the conventional bridge would provide the optimum solution when all aspects were considered.				

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
9.8	<p>attenuation.</p> <p>Highways: The LPA is concerned that the absence of any simultaneous improvements to the Fleetwood Road stretch of the A585 (running southbound between the Windy Harbour junction and junction 3 of the M55) in conjunction with the bypass would restrict the scheme's benefits in alleviating traffic congestion only to the stretch applied for and could act to move existing congestion onto other parts of the A585 which have less capacity to accommodate flows emerging from the bypass.</p>	<p>As defined in Highways England's RIS 1 Delivery Plan, the scheme requirements were to assess the A585 from Windy Harbour to Skippool to address the congestion and safety concerns at the junctions along this stretch. It is acknowledged that although altering the Scheme extent would change the Scheme's Economic Assessment results the Scheme proposed is shown to generate economic, operational and environmental benefits without any extension to the M55 or towards Fleetwood as presented in the Planning Statement and National Policy Accordance (document reference TR010035/APP/7.1) section 2.9. In addition, the Highways England Operations Directorate is conducting investigatory studies for along other areas of the A585 that are separate from the A585 Windy Harbour to Skippool Improvement Scheme. A sensitivity test was undertaken by the Applicant that considered the impact of other Operations Directorate schemes on the A585 Windy Harbour to Skippool Improvement Scheme which showed that when including the capacity improvement upgrades of adjacent potential Operations Directorate schemes along the A585 route it remained economically worthwhile (based on an assessment of Transport User Benefits only) to proceed with the A585 Windy Harbour to Skippool Improvement Scheme. The impact of the Scheme on traffic distribution across the highway network has been assessed and can be found in the Scheme Combined Modelling and Appraisal Report (document reference TR010035/APP/7.12) Appendices F and H.</p>
9.9	<p>In particular, there have been a number of serious accidents at the A585/B5269 (Thistleton/Mile Road) junction, but the scheme does not propose any improvements to this junction or the wider Fleetwood Road section of the A585. Accordingly, the LPA is concerned that the scheme does not appear to deliver a holistic approach to improving the safety and capacity of the wider highway network, especially those parts with less capacity that would be linked directly with the bypass.</p>	<p>The Applicant is aware of issues with the junction and further work is being undertaken by Applicant. The Scheme does not have a negative impact on the junction, with a forecast reduction in traffic flows through the junction there is less potential for conflict with the predominant flow on the A585 Fleetwood Road.</p> <p>Highways England's Operations Directorate is conducting investigatory studies for the A585/B5269 (Thistleton/Mile Road) and the M55 Junction 3 along Fleetwood Road that are separate from the A585 Windy Harbour to Skippool Improvement scheme.</p>
RR-010	Fleetwood Renewable and Energy Enterprise 2007	
10.1	<p>The object of the proposed bypass road from Windy Harbour to Skippool is to eliminate traffic congestion at Little Singleton junction and reduce the number of vehicles using Mains Lane.</p>	<p>The objectives of the scheme are not only "to eliminate traffic congestion at Little Singleton junction and reduce the number of vehicles using Mains Lane" but also to provide the following as outlined in Chapter 2 of the Environmental Statement (document reference TR010035/APP/6.2)</p> <ul style="list-style-type: none"> • Reduce severance and improve access across the A585 between Little Singleton and Skippool Junctions • Improve connectivity and community cohesion • Making the A585 route safer by reducing conflicts between users • Improve journey time reliability by reducing congestion • Deliver capacity enhancements to the SRN whilst supporting the use of sustainable modes • Support employment and residential/commercial development and growth opportunities • Support the removal of obstacles to economic growth potential in both Wyre and Fylde • Reduce/minimise the impact on the wider environment particularly for air quality and noise • Complement and realise the full benefits of other Operations Directorate schemes in the region
10.2	<p>Over 50 percent of the population of Wyre Council reside along the coast and they will be adversely affected by the new road because the Project Remit turns a blind eye to</p>	<p>As defined in Highways England's RIS1 Delivery Plan, the Scheme requirements were to assess the A585 from Windy Harbour Junction to Skippool Junction to address the congestion</p>

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
	traffic conditions beyond Skippool.	and safety concerns at the junctions along this stretch. It is acknowledged that although altering the scheme extent would change the Scheme's Economic Assessment result, the Scheme proposed will still generate economic, operational and environmental benefits without any extension to the M55 or towards Fleetwood as presented in Planning Statement and National Policy Accordance, Section 2.9 (document reference TR010035/APP/7.1). In addition, the Highways England Operations Directorate is conducting investigatory studies for the A585/B5269 (Thistleton/Mile Road) and the M55 Junction 3 along Fleetwood Road that are separate from the A585 Windy Harbour to Skippool Improvement Scheme. A sensitivity test was undertaken by the Applicant that considered the impact of other Operations Directorate schemes on the A585 Windy Harbour to Skippool Improvement Scheme which showed that when including the capacity improvement upgrades of adjacent potential Operations Directorate schemes along the A585 route it remained economically worthwhile (based on an assessment of Transport User Benefits only) to proceed with the A585 Windy Harbour to Skippool Improvement Scheme. The impact of the Scheme on traffic distribution across the highway network has been assessed and can be found in the Scheme Combined Modelling and Appraisal Report (document reference TR010035/APP/7.12)
10.3	The effect of the bypass will be to move the long delays at Little Singleton to Skippool.	The impact of the Scheme on traffic distribution across the highway network has been assessed and can be found in the Scheme Combined Modelling and Appraisal Report (document reference TR010035/APP/7.12) Appendix F and H.
10.4	The proposed changes to Norcross junction could contribute to reducing delays at Skippool but the redesign is not included in the Development Consent Order Application. Without such details it is not possible to take a realistic view of the bypass.	The Norcross junction improvements will be completed in advance of the Scheme and confirmed that the Norcross scheme is predicted to deliver journey time benefits and reduce queuing which will provide capacity growth in the future, when completed, both schemes would complement one another.
10.5	Poor access to Fleetwood has contributed to all the Town's Wards becoming deprived areas. As a consequence, Highways England took the view that because the area was in decline improving access to Fleetwood was not a priority.	The Applicant does not agree with this statement. The role of Highways England is to support economic growth through the provision of the Strategic Road Network.
10.6	Cardiff like Fleetwood had been in decline for decades when the Council took steps to de-designate their environmentally protected bay so the Town could regenerate. There were serious concerns about taking this action, but the environmental changes proved to be negligible. The 2003 British Trust for Ornithology report shows that controlling tidal flow in the Bay has brought about minor changes for wild life with some winners and losers. However, overall the changes have not been significant but for both residents and visitors the transformation of the Bay has brought about outstanding improvements.	The Applicant's focus is on improving transport to support the Local Authorities proposals, ultimately any proposals to regenerate the area would be led by the local planning authorities.
10.7	Wyre Council's 2007 Fleetwood Masterplan aimed at reversing the Town's decline was considered by one of the Country's leading town planners as an ineffective document to bring about the Town's regeneration. This scheme was followed by the 2009 Fleetwood Seafront Masterplan based on the 2007 Fleetwood Masterplan. The goal was to boost the Town's economy by attracting more people to look at the Lake District hills from Fleetwood. The consultant's Plan was for minor attractions to be built in various Zones along the Seafront. In this way Fleetwood's cultural heritage and unique environment was to be protected and enhanced whilst the Council, statutory bodies, businesses residents and other stakeholders were to support this vision	Refer to response RR-10 (10.6)
10.8	The Masterplans are available on the internet but neither has worked. Fleetwood's decline continues as predicted in 2007 with businesses and visitor attractions continuing to close or go into administration.	Refer to response RR-10 (10.6)

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
10.9	The Plan to turn the Town's industrial housing estates has increased commuters on the A585. If Wyre Council's advisers had had the vision of those at Cardiff, a road network would have inevitably been put in place to support the changes and regeneration.	Noted – no response required.
10.10	Clearly a holistic view has to be taken and modifying the A585 Remit to include the wider area is vital if the best use is to be made of human and financial resources.	Noted – no response required.
RR-011	Lancashire County Council	
11.1	The issues that Lancashire County Council proposes to raise as part of the examination of the A585 Windy Harbour to Skippool Improvement are as follows: - The current congestion, safety and capacity issues that are experienced on the existing road network in this area.	Noted. The Applicant has been actively engaging with Lancashire County Council and is looking to address the more detailed comments that have been received, which should help inform the Local Impact Report.
11.2	The relationship of the proposed DCO scheme with current County Council policies for highway improvements in this area in particular those contained in the County Council's adopted Fylde Coast Highways and Transport Masterplan and the County Council's own proposal for the Blue Route between the M55 east of junction 4 and the A585 Mains Lane at Skippool.	The Applicant has also been engaging with Lancashire County Council on the de-trunking elements of the Scheme.
11.3	The relationship of the proposal to the policies set out in the National Planning Policy Framework and the Development Plan (Fylde Local Plan, Wyre Local Plan and emerging policies)	
11.4	The local environmental impacts of the road construction development including the following: Highway safety including impacts upon the County Council's existing highways infrastructure. Landscape impact during and following construction Ecology including impact on European sites (Morecambe Bay SPA) Archaeology and heritage issues Noise and Air Quality during and following construction Flooding and impact on the water environment Impact on the amenities of properties close to the route alignment (both positive and negative)	
11.5	The County Council's views on the DCO proposal in terms of these issues will be set out more fully in its Local Impact Report.	
RR-012	David Gardner	
12.1	Concern that the traffic density problem will simply move to Amounderness Way and cause major disruption at the Skippool Junction	As defined in Highways England's RIS 1 Delivery Plan, the Scheme requirements were to assess the A585 from Windy Harbour Junction to Skippool Junction to address the congestion and safety concerns at the junctions along this stretch. Highways England Operations Directorate is conducting investigatory studies for Norcross separate from the A585 Windy Harbour to Skippool Improvement Scheme. The area wide changes in traffic volume forecasted for 2037 are presented in Transport Assessment Section 5.2 and Appendix A (document reference TR010035/APP/7.4). The impact of the Scheme on traffic distribution across the highway network has been assessed and can be found in the Scheme Combined Modelling and Appraisal Report (document reference TR010035/APP/7.12) Appendix F and H.
RR-013	Historic England, North West	
13.1	In accordance with its statutory remit, Historic England will be commenting on the 'cultural heritage' impacts of the Scheme, as set out in Chapter 7 of the Environmental Statement (ES) and related documents. We will confirm that the Scheme would have	Historic England has signed a Statement of Common Ground (SoCG) with the Applicant (document reference TR010035/APP/8.6) to state they are content with the assessment outlined within Environmental Statement Chapter 7: Cultural Heritage (document reference

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
	a limited impact on designated heritage assets, and that the proposed measures for mitigation of those impacts are appropriate.	TR010035/APP/6.7). They are also content with the proposed strategy for dealing with archaeological remains, including archaeologically significant peat deposits which has been consulted with the archaeological advisor to Lancashire County Council. The signed SoCG was submitted at Deadline 1.
13.2	We will also comment on the proposed measures for identifying, assessing and recording archaeological features which might be impacted by the Scheme. Again, we will confirm that the proposed measures constitute an appropriate response to the potential impact of the Scheme on archaeological remains	Noted – no further response required
RR-014	Barbara Hargreaves	
14.1	I wish to object to the proposed road development. 1. The road will be within a few meters of our property, to the west south and north	The distance between the southern corner of this house to the top of the cutting would be about 21 metres and to the front face of the proposed north retaining wall would be about 32 metres. The bypass cutting would be about 38 metres wide at this location.
14.2	2. Excavations so close to our property may cause damage to our 150 years old home.	The Applicant will appoint a contractor who will have a duty of care to limit the damage to properties, in the unforeseen circumstances where damage occurs, steps would be undertaken to mitigate this. For example, through Protective Works to the building.
14.3	3. Our access will be compromised	Although the Singleton Hall access road would be severed by the construction of the bypass, vehicular and pedestrian access to the North Lodge driveway from Lodge Lane would be retained in its present form.
RR-015	Greenhalgh with Thistleton Parish Council	
15.1	Issues raised at parish council meeting 21/1/2019. A full survey of the road must take in to account feeder roads, proposed development in Poulton, Wyre and Gt Eccleston.	Development of the traffic model used information from automatic and specific traffic counts, including road side interviews for the whole of the Fylde Peninsula including counts in areas as widespread as Blackpool, Fleetwood, Preston and Garstang all the way to the M6 in the east and beyond the M55 to the south. Forecasts have been prepared for 3 model years, 2022, 2037 and 2051. Planning status for future developments have been obtained from Blackpool and Fylde Council and taken from the Wyre draft Local Plan. Future development classified as Near Certain and More than Likely have been taken into account within the traffic modelling and it has been found that there will be sufficient capacity on the proposed bypass.
15.2	Consideration to be given to road use by HGV's especially those proposed by Cuadrilla for Fracking sites. The proposed bypass does not address the density but rather speed of flow of traffic.	Information from the Cuadrilla website https://cuadrillaresources.com/our-sites/lancashire/ indicates that (for their sites near the A585): <ul style="list-style-type: none"> • Grange Hill site at Singleton – was decommissioned in July 2018 • Preese Hall site at Warton – was decommissioned in 2015 • Elswick site is approaching the end of its producing life Roseacre site (east of Thistleton) – a reopened planning inquiry was held in 2018 and subsequently the Secretary of State refused the planning application in February 2019 for the site and Cuadrilla indicate they would not appeal against that decision.
15.3	The road will not increase the capacity of the A585. the section of road is possibly NOT being considered as part of an overall scheme.	The improvements will overall increase the capacity of the section of road included within the Scheme.
15.4	The parish council are keen to give a first-hand report if required.	Noted – no further response required.
RR-016	Colin Hirst	
16.1	This scheme is vital for the wellbeing of the sub region and the sustainable economic future of the area, successful regeneration and delivery of the Hillhouse Enterprise zone. It will serve to improve the local environment by reducing congestion and associated pollution. There appears to be no demonstrable grounds to refuse the application and as much needed key infrastructure for the area it should be progressed as soon as possible.	Noted – no further response required.
RR-017	Mr Robert Partington Kearsley	

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
17.1	1. At no time was I or my neighbours informed of the Proposed Works. Whilst we appreciate that Highways England are at the pre-Development Consent Order stage, I am concerned that the appropriate consultation process has not been followed.	<p>The Applicant has taken all necessary steps to comply with the required consultation process. The statutory consultation was held in accordance with the Statement of Community Consultation (SoCC) as detailed in the Consultation Report (document reference TR010035/APP/5.1) section 4.3 and Section 47 of the Planning Act 2008. Consultation material was available to view online and at deposit locations around the Scheme area. Section 42 letters were sent in accordance with the requirements of the Planning Act 2008, a Section 46 notification letter was sent to the Planning Inspectorate and four public consultation events were held in accordance with Section 47 of the Planning Act 2008.</p> <p>The Applicant has checked their records and Mr Kearsley was notified of the Scheme. It is noted that Mr Kearsley provided a questionnaire response to the non-statutory consultation in September 2016. A statutory consultation was also undertaken between March and May 2018.</p>
17.2	2. I do not agree that this stretch of the A585 necessarily suffers from serious congestion which requires a "solution". The position has been substantially skewed by the fact that over the past 3 years this and other roads in the vicinity have been subject to regular minor and major roadworks	<p>The need to ease congestion has been identified by Highways England since 2014. Notwithstanding, the introduction of minor and major roadworks, the need for the Scheme is still justified.</p>
17.3	3. I would comment how the recent works at the Windy Harbour junction have made this a traffic congestion/road rage "hotspot". To the extent that there is a congestion problem (which is not admitted). It will simply create a double "bottle-neck" at its Eastern and Western ends. Traffic will of course flow more quickly along the new dual carriageway between points A to B (Windy Harbour and Skippool respectively)-but at these locations there will be congestion "pinch" points as the "supply" of traffic reaches an abrupt halt. Of particular concern is the likely increase in congestion at the Windy Harbour Junction (the main junction for traffic heading to and from Junction 3 of the M55).	<p>As defined in Highways England's RIS 1 Delivery Plan, the Scheme requirements were to assess the A585 from Windy Harbour Junction to Skippool Junction to address the congestion and safety concerns at the junctions along this stretch. It is acknowledged that although altering the Scheme extent would change the Scheme's Economic Assessment result, the Scheme proposed will still generate economic, operational and environmental benefits without any extension to the M55 or towards Fleetwood as presented in the Planning Statement and National Policy Accordance (Document reference TR010035/APP/7.1) Section 2.9. In addition, the Highways England Operations Directorate is conducting investigatory studies for possible junction improvements at Norcross, the A585/B5269 (Thistleton/Mile Road) and the M55 Junction 3 along Fleetwood Road that are separate from the A585 Windy Harbour to Skippool Improvement Scheme. The impact of the Scheme on traffic distribution across the highway network has been assessed and can be found in the Scheme Combined Modelling and Appraisal Report (document reference TR010035/APP/7.12) Appendix F and H.</p>
17.4	4. Traffic travelling from the area over the River Wyre to and from Hambleton/Preesall are unlikely to use the new route. Instead, to avoid the double bottlenecks the traffic will be directed through the villages of Little Singleton and Singleton. Similarly, in order to avoid the Windy Harbour bottleneck, traffic travelling North/South is likely to be divert through Singleton Village (via Lodge Lane and Mile Road).	<p>The Scheme transport assessment covers a wide area, focusing on the road network to the north of the M55 and to the west of the M6, including the principal settlements as shown in Figure 3.9 in Transport Assessment (Document reference TR010035/APP/7.4) Section 3. The area wide changes in traffic volume forecasted for 2037 are presented in the Transport Assessment (Document reference TR010035/APP/7.4) Section 5.2 and Appendix A. This shows that the traffic flows on Lodge Lane and Mile Road will be slightly higher northbound (most notably in the AM peak) but will reduce in the southbound direction in all time periods.</p>
17.5	5. I will also find the only route from my house to the M55 will be through Singleton Village as I will be unable to turn right out of my drive onto Lodge Lane and then turn right at the lights and along Garstang Road to the Windy Harbour Junction (since this section of the road is being removed to form a Bridle Way).	<p>An alternative route would be available via the A586 Garstang Road East and joining the proposed bypass at the proposed Poulton Junction towards Windy Harbour Junction. This route would be about 4.2km long compared with the existing route through Little Singleton Junction that is about 2.3km long.</p>
17.6	6. The Proposed Works are likely to cause substantial disruption to my family. As detailed above, I purchased the Coach House in November 2014, a month before there was any information released into the public domain about the Proposed Works. The peaceful surroundings and the rural lifestyle which I have worked so hard to acquire will be all but destroyed by the scheme. It is expected that traffic noise will be a major issue, seriously undermining the quality of life which my family currently enjoy. Visually, the existing attractive approach to the Property will be blighted by stark road infrastructure concrete and landscaping. I am concerned that even now,	<p>Increases in road traffic noise levels generated by the Scheme in this location would be mitigated to a minimum and below a level where significant adverse effects on health would occur through the implementation of low noise surfacing, a 2 metre high noise barrier and the Scheme being located within a cutting as presented in Figure 11.4 of the Environmental Statement Chapter 11: Noise and Vibration (document reference TR010035/APP/6.11).</p> <p>The Scheme would be in cutting at this location. The access road would be diverted and views from this new route towards the Scheme would be screened as a result of proposed vegetation</p>

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
	with the Proposed Works being public knowledge, the Property is substantially de-valued.	and noise attenuation barriers located along the top of the cutting slopes (refer to the Environment Masterplan (document reference TR010035/APP/6.19)). This impact as recorded in the Environmental Statement Chapter 9: Landscape (document reference TR010035/APP/6.9) would result in a significant visual effect during the construction phase and Scheme opening year which would reduce overtime as the vegetation establishes.
17.7	7. My neighbour has already off loaded their property to HE. Surely a little presumptive?	The Applicant is unable to comment on the purchase of individual properties. The acquisition of properties is dealt with on a case by case basis and relates to the circumstances of both parties.
17.8	8. HE have declared "Travel time savings of between 2 and 4.5 minutes per journey are forecast to be saved by road users due to the Scheme." What benefit?	Refer to response in RR-003 (3.3)
RR-018	Marine Management Organisation (MMO)	
18.1	The Marine Management Organisation (MMO) is an interested party for the examination of Development Consent Order (DCO) applications for Nationally Significant Infrastructure Projects (NSIPs) in the marine area. The MMO received notification on 26 November 2018 stating that the Planning Inspectorate (PINS) (on behalf of the Secretary of State for Business, Energy and Industrial Strategy) has accepted an application from Highways England ("the Applicant"), for a DCO for The A585 Windy Harbour to Skippool Scheme.	Noted – no further response required.
18.2	The MMO has an interest in this project because the development contains construction activities which extend within the marine environment. The DCO application includes a Deemed Marine Licence (DML) under Section 65 of the Marine and Coastal Access Act 2009 (MCAA 2009) and should consent be granted for the project, the MMO will be responsible for monitoring, compliance and enforcement of DML conditions.	Noted – no further response required.
18.3	During the pre-application stages of this application the applicant has engaged with the MMO on a number of occasions. Specifically, the MMO has been provided with the opportunity to review and comment on draft versions of the DML. Whilst the MMO has reviewed of some of the submitted documents during the pre-application stages of this application, it should be noted that the MMO were not engaged at the scoping stage nor had sight of a draft version of the Environmental Statement (ES) prior to submission.	Noted – no further response required.
18.4	For completeness, a summary of our pre-application engagement is provided below, so PINS is fully aware of our comments on the proposal. This summary includes, but is not limited to, the following pre-application engagement activities: Statutory Consultation from Highways England to the MMO received 19/03/2018 (MMO Section 42 Response issued 2 May 2018). Telecon with Arcadis (Highways England contractor) and MMO regarding Schedule 8 of the draft DCO 7 November 2018. Throughout the pre-application process, the MMO has been willing to engage in discussions surrounding the development of Statements of Common Ground (SoCG). The MMO has reviewed the chapters of the ES, as submitted. The following chapters have been considered: Chapter 1: Introduction Chapter 2: Description of the Scheme Chapter 3: Consultation Chapter 5: Approach to the Environmental Impact Assessment Chapter 8: Biodiversity Chapter 11: Noise and Vibration	Noted. A Statement of Common Ground has been developed (document reference TR010035/APP/8.16) and the Applicant is working with the MMO to close out the comments.

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
	<p>Chapter 13: Geology and Contaminated Land Chapter 16: Cumulative Effects Chapter 17: Summary Chapter 18: Non-technical Summary Chapter 19: Environmental Masterplan Chapter 20: The Planning Inspectorates Scoping Opinion 5.4 Habitats Regulations Assessment 5.6 Water Framework Directive Assessment The following chapters have not been reviewed as the MMO consider them to be outside of our remit:</p> <ul style="list-style-type: none"> • Chapter 4: Alternatives Assessment • Chapter 6: Air Quality • Chapter 7: Cultural Heritage • Chapter 9: Landscape • Chapter 10: People and Communities • Chapter 14: Materials • Chapter 15: Climate <p>In examining the DCO Application, PINS is required to have regard to the Marine Policy Statement and any relevant marine plan. In this regard, the MMO confirm that, as proposed, the Project will be undertaken within the North West Inshore Marine Plan area, for which a Marine Plan is not currently adopted.</p>	
18.5	The information presented in the ES is in line with pre-application discussions and responses to consultations that the MMO have already engaged in (see above).	Noted – no further response required.
18.6	The MMO is of the opinion that the study area accurately captures the area of interest to the MMO and agrees with the conclusions of the ES and proposed mitigation measures. Overall, the MMO is content with the radius defined for local environmental considerations and is of the opinion that the likely potential impacts to the marine environment have been adequately considered.	Noted – no further response required.
18.7	The MMO notes that the ES specifically recognises that works associated with the northern end of the Horsebridge Dyke culvert will be within the marine environment, with the order limits extending below mean high water springs (MHWS).	Noted – no further response required.
18.8	The MMO would highlight that the inshore marine area includes any area which is submerged at mean high water spring tide up to the territorial limit . They also include the waters of every estuary, river or channel where the tide flows at MHWS tide.	Noted – no further response required.
18.9	The MMO recognises that the developer has amended the order limits in the area to the North of Bankfield Farm to avoid intersection with the MHWS line, as mapped. However, should ground conditions show that any planned maintenance activity associated with drainage works is within the marine environment, as described above, then these may also be subject to marine licensing requirements under the Marine and Coastal Access Act (2009).	We had previously liaised with MMO during the pre-submission period about the effect of the Scheme on the un-named watercourse near Bankfield Farm, Pool Foot Lane. The draft order limits to obtain rights to manage and maintain that watercourse were adjusted as it is not expected that any works will be carried out within the Mean High Water Springs (MHWS) line that is curtailed by an existing tidal flap valve. However, in the unlikely event that maintenance is required within the MHWS line, then a separate marine licence will be applied for accordingly.
18.10	Any mitigation measures that are; (1) associated with licensable activities within the marine area (2) secured through a specific construction environmental management plan (CEMP) should be supplied in support of any relevant submission under the DML.	As part of the Application, an Outline Construction Environmental Management Plan (CEMP) has been included (document reference TR010035/APP/7.2). As part of the discharge of requirements the contractor will consult the MMO on the final CEMP.
18.11	Overall, the MMO is of the opinion that the data and assessments presented in the ES are appropriate to the nature and scale of the works associated with this DCO	Noted – no further response required.

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
	application. The MMO notes that those aspects of the project within the marine environment are relatively small scale and low risk in nature. As such, no further detailed comments are deemed necessary.	
18.12	In Part 4 (17), the DCO states that “The undertaker may use any watercourse or any public sewer or drain for the drainage of water in connection with the carrying out or maintenance of the authorised development and for that purpose may lay down, take up and alter pipes and may, on any land within the Order limits, make openings into, and connections with, the watercourse, public sewer or drain.” The MMO advises that these activities may have their own requirements for marine licensing should the watercourse in question be considered to be within the UK Marine Area (Section 42, Marine and Coastal Access Act).	Noted – no further response required.
18.13	In Schedule 2, Part 1(7), the DCO makes reference to a range of pre-construction survey work in relation to protected species. Survey results should be provided to the MMO in support of any relevant submissions under the DML.	Survey results will be provided as part of the of the submission under the DML. Also, as part of the discharge of requirements, the MMO will be consulted, whereby any further survey work will be provided.
18.14	Under Part 1, Item 2 (2) the contact email address for the marine licensing team should be amended to: marine.consent@marinemanagement.org.uk	Draft Development Consent Order (document reference TR010035/APP/3.1) will be updated to reflect this and will be issued at Deadline 2.
18.15	Under Part 1, Item 2 (2) the following detail should be added to address details: where local office contact is required use preston@marinemanagement.org.uk	Draft Development Consent Order (document reference TR010035/APP/3.1) will be updated to reflect this and will be issued at Deadline 2.
18.16	Part 2, The DML should provide and make reference to a table of coordinates that sets out the limits within which any licensable activities are to take place. These coordinates should be specific to the DML and only capture the marine area.	Draft Development Consent Order (document reference TR010035/APP/3.1) will be updated to reflect this and will be issued at Deadline 2.
18.17	Part 4 (6) and Part 4 (9) of the DML refers to the start and completion of works notifications. These notifications should also be submitted in writing to the local office as provided for under point 3.2 above.	Noted – no further response required.
18.18	Part 4 (7) of the DML makes reference to the requirement to notify MMO ‘at the earliest opportunity’ should any information on which the granting of this licence was based has/is likely to change. The following text should be added to bring the text in line with standard condition wording: “Failure to do so may render this licence invalid and may lead to enforcement action”.	Draft Development Consent Order (document reference TR010035/APP/3.1) will be updated to reflect this and will be issued at Deadline 2.
18.19	<p>The MMO requests the addition the following licence conditions within Part 4 of the DML:</p> <p>(1)“Any oil, fuel or chemical spill within the marine environment must be reported to the MMO Marine Pollution Response Team within 12 hours. Within office hours: 0300 200 2024. Outside office hours: 07770 977 825. At all times if other numbers are unavailable: 03450518486. dispersants@marinemanagement.org.uk”.</p> <p>(2)“Bunding and/or storage facilities must be installed to contain and prevent the release of fuel, oils, and chemicals associated with plant, refuelling and construction equipment, into the marine environment. Secondary containment must be used with a capacity of no less than 110% of the container’s storage capacity.”</p> <p>(3)“The licence holder must submit a method statement to the MMO at least 10 weeks prior to the proposed commencement of the licensed activities. Once approved the method statement and any mitigation measures contained therein must be strictly adhered to. Licensed activities must not commence until written approval is used by the MMO.”</p> <p>(4)“The licence holder must not discharge waste concrete slurry or wash water from concrete or cement into the river. The licence holder must site concrete and cement</p>	Draft Development Consent Order (document reference TR010035/APP/3.1) will be updated to reflect this and will be issued at Deadline 2.

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
	<p>mixing and washing areas at least 10 metres from the river or surface water drain to minimise the risk of run off entering the river.”</p> <p>(5)“The licence holder must not discharge waste concrete slurry or wash water from concrete or cement into the river. The licence holder must site concrete and cement mixing and washing areas at least 10 metres from the river or surface water drain to minimise the risk of run off entering the river.”</p> <p>(6)“Vibro-piling must be used as standard, with percussive piling only used if required to drive a pile to its design depth. If percussive piling is necessary soft- start procedures must be used to ensure incremental increase in pile power over a set time period until full operational power is achieved. The soft-start duration must be a period of not less than twenty minutes. Should piling cease for a period greater than ten minutes, then the soft start procedure must be repeated.”</p> <p>(7)“If concrete is to be sprayed suitable protective sheeting must be provided to prevent rebounded or windblown concrete from entering the waterenvironment. Rebound material must be cleared away before the sheeting is removed.”</p> <p>(8)“During licensed activities all wastes must be stored in designated areas that are isolated from surface water drains, open water and bunded to contain any spillage.”</p>	
18.20	<p>During pre-application engagement between the MMO and the Applicant, the MMO provided comments on the draft DCO and DML documents. Unfortunately the MMO was not provided with the opportunity to review any draft versions of the ES prior to submission to PINS. The MMO is of the opinion that the Environmental Statement generally provides a thorough assessment of the potential impacts on the marine environment from the construction activities associated with Windy Harbour to Skippool Scheme. The marine aspects of the Scheme are minor in nature, with MMO’s main comments relating to drafting of the DML, and the necessity for co-ordinates to be included.</p> <p>The MMO would welcome future engagement from the developer to ensure that the issues are resolved in a timely manner.</p> <p>The MMO reserves the right to modify its present advice or opinion in view of any additional matters or information that may come to our attention.</p>	<p>The MMO was provided with the PEIR. We have been working with the MMO to develop a SoCG (document reference TR010035/APP/8.16).</p>
RR-019	Natural England	
HRA General Comments		
19.1	<p>The HRA analysis (in section 6 of this letter) should be using and referencing the Morecambe Bay & Duddon Estuary SPA Draft Supplementary Advice Document which has been available since 14 September 2018.</p>	<p>Updates will be included in Sections 6.3.3 and 6.5.2 of Revision 2 of the Habitats Regulations Assessment (document reference TR010035/APP/5.4 – Rev 2) to reference the Draft Supplementary Advice. Revision 2 of the Habitats Regulations Assessment will be issued to the Planning Inspectorate at Deadline 2.</p>
19.2	<p>There are several places within the HRA which refers to mitigation ‘where possible’. These include paragraphs 7.4.15 and 7.7.6. This should be removed as ‘where possible’ is unacceptable in HRA terms because it does not provide the necessary level of certainty that an impact would not occur.</p>	<p>Reference to ‘where possible’ will be removed to demonstrate that the mitigation will be delivered within paragraphs 7.4.15 and 7.7.6 of Revision 2 of the Habitats Regulations Assessment (document reference TR010035/APP/5.4 – Rev 2). Revision 2 of the Habitats Regulations Assessment will be issued to the Planning Inspectorate at Deadline 2.</p>
19.3	<p>Paragraph 7.4.23 in the HRA references the temporary bird mitigation area and lists this as a ‘precautionary measure’. This mitigation is required to offset disturbance to three key SPA and Ramsar species during construction. The need for this mitigation is clearly evidenced and this should not be referred to as ‘precautionary’ mitigation.</p>	<p>Paragraph 7.4.23 will be amended to remove reference to ‘as a precautionary measure’ within Revision 2 of the Habitats Regulations Assessment (document reference TR010035/APP/5.4 – Rev 2). Revision 2 of the Habitats Regulations Assessment will be issued to the Planning Inspectorate at Deadline 2.</p>
19.4	<p>In the HRA, Table 23 of section 7.8.2 regarding Direct loss of foraging/roosting habitat from construction is contradictory; it notes that mitigation is not required, then concludes no adverse effect with mitigation in place. Mitigation is clearly being considered and so the field labelled ‘Mitigation required’ should say ‘Yes’.</p>	<p>The third column of Table 23 will be amended to remove ‘with mitigation in place’ within Revision 2 of the Habitats Regulations Assessment (document reference TR010035/APP/5.4 – Rev 2). Revision 2 of the Habitats Regulations Assessment will be issued to the Planning Inspectorate at Deadline 2.</p>

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
19.5	Paragraph 7.3.1 in the HRA regarding Embedded Mitigation - it would be useful to include a list of the embedded mitigation within the HRA as this is not clear which mitigation measures are considered to be 'Embedded'.	Mitigation considered to be 'embedded' will be clarified within Revision 2 of the Habitats Regulations Assessment (document reference TR010035/APP/5.4 – Rev 2) within Section 7.3. However, it should be noted that there is no standard and accepted definition of what is considered to be 'embedded' mitigation. Revision 2 of the Habitats Regulations Assessment will be issued to the Planning Inspectorate at Deadline 2.
19.6	Under Schedule 8 Deemed Marine Licence, Part 2, 4. (a) and (b), none of this work is reflected in the submitted HRA and therefore the impacts of the project on the marine environment/ Morecambe Bay SPA have not been considered. This assessment needs to be included within the HRA and a separate MCZ assessment submitted before the Marine Licence can be granted	Section 6.2 will be amended to include reference to the proposed Marine Conservation Zone (pMCZ) within Revision 2 of the Habitats Regulations Assessment (document reference TR010035/APP/5.4 – Rev 2). As the qualifying feature of the pMCZ is smelt and is not a qualifying feature of any European designated sites, or Ramsar sites considered in the assessment, no further consideration of the pMCZ is required within the HRA. A separate MCZ screening assessment has been prepared and submitted to the Marine Management Organisation as part of the Marine Licence application. Note: the only element of the Scheme considered to be 'marine works' is the replacement of Skippool Clough culvert which involves demolishing and replacing the north headwall located within the Mean High Water Springs. The updated Habitats Regulations Assessment will be issued to the Planning Inspectorate at Deadline 2.
HRA Water Quality and Run-off:		
19.7	We agree with the conclusion of the appropriate assessment that mitigation measures are required for water run-off however there are no details of the proposed mitigation – there are only links to the Outline CEMP which does not include any specific measures to combat water run off/pollution via Main Drain.	Further detail will be included in Section 7.4.45 and Table 20 of Revision 2 of the Habitats Regulations Assessment (document reference TR010035/APP/5.4 – Rev 2) and within Revision 1 of the draft Pollution Control Plan appended to the Outline Construction Environmental Management Plan (Appendix G) (document reference TR010035/APP/7.2 – Rev 1) – Revision 2 of the Habitats Regulations Assessment and Revision 1 of the draft Pollution Control Plan will be submitted to the Planning Inspectorate at Deadline 2.
19.8	The same conclusion has also been made in the Environmental Statement Chapter 8 Biodiversity (paragraph 8.6.5) but again, no details have been included.	Further detail will be included within Revision 1 of the draft Pollution Control Plan appended to the Outline Construction Environmental Management Plan (Appendix G) (document reference TR010035/APP/7.2 – Rev 1) – Revision 1 of this document will be submitted to the Planning Inspectorate at Deadline 2.
19.9	We have previously advised that detailed mitigation measures are needed to demonstrate that the proposed mitigation is sufficient to rule out adverse effect i.e. provide the necessary level of certainty. There must be reasonable scientific doubt, that the project will not have an adverse effect on integrity before giving consent.	Further detail will be included in Section 7.4.45 and Table 20 of Revision 2 of the Habitats Regulations Assessment (document reference TR010035/APP/5.4 – Rev 2) and within Revision 1 of the draft Pollution Control Plan appended to the Outline Construction Environmental Management Plan (Appendix G) (document reference TR010035/APP/7.2 – Rev 1), to confirm that the Scheme will not have an adverse effect on the integrity of the European sites. Revision 2 of the Habitats Regulations Assessment and Revision 1 of the draft Pollution Control Plan will be submitted to the Planning Inspectorate at Deadline 2.
19.10	Appendix 5 of the submitted HRA includes a table of how Highways England have taken into account Natural England's previous comments. For water quality it states that 'Additional text will be added to the next iteration of the HRA to confirm the details of the water quality measures which will be implemented to protect water quality in the SPA/Ramsar site. The additional text included now relies on mitigation within the Outline CEMP, included as appendices which have not been submitted. To be effective mitigation within the HRA, either the relevant appendices in the Outline CEMP need to be submitted upfront or full details of the mitigation requirements need to be included in the HRA and Draft DCO. The Environmental Statement Chapter 8 Biodiversity should also be updated with details of the mitigation proposed.	Further detail will be included in Section 7.4.45 and Table 20 of Revision 2 of the Habitats Regulations Assessment (document reference TR010035/APP/5.4 – Rev 2) and within Revision 1 of the draft Pollution Control Plan appended to the Outline Construction Environmental Management Plan (Appendix G) (document reference TR010035/APP/7.2 – Rev 1). Revision 2 of the Habitats Regulations Assessment and Revision 1 of the draft Pollution Control Plan will be submitted to the Planning Inspectorate at Deadline 2. Chapter 8: Biodiversity (document reference TR010035/APP/6.8) has not been updated as it is considered the pollution prevention mitigation proposed is adequately secured by the draft Pollution Control Plan appended to the Outline Construction Environmental Management Plan (Appendix G) (document reference TR010035/APP/7.2 – Rev 1).
HRA – Night Construction Working		
19.12	Paragraph 7.4.12. In the HRA, it is stated that night time working will not exceed 95 days over the 2-year construction period, that this will be agreed in advance with the	Additional text will be added to paragraph 7.4.12 of Revision 2 of the Habitats Regulations Assessment (document reference TR010035/APP/5.4 – Rev 2) to provide further details of

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
	<p>LPA and the restrictions outlined in the Outline CEMP and REAC. This concludes by saying that this is short-term and small-scale working and therefore any potential disturbance or displacement effects are negligible and not significant. We disagree with this conclusion and would consider that up to 95 days over a two-year construction period could potentially be significant especially if the majority of those 95-night working days are concentrated over the winter period. Therefore, this needs clarification and further analysis and potentially further mitigation measures. Also, there are no restrictions outlined in the Outline CEMP relating to night time working. And where there are requirements and restrictions for night time working included within submitted documents, the detail differs. This needs to be clarified.</p>	<p>potential night working requirements during the construction phase of the Scheme. There would be no significant adverse disturbance / displacement effects associated with night time working. Revision 2 of the Habitats Regulations Assessment will be issued to the Planning Inspectorate at Deadline 2.</p>
19.13	<p>The REAC reference no. 4Z states that – ‘Construction works would be phased to allow the most sensitive sections of the Scheme to be constructed outside of the winter months. In addition, ... avoiding night-time working would be required.’ This sentence is also repeated in the Environmental Statement Chapter 8 Biodiversity (paragraph 8.6.8). Natural England supports this however, REAC reference no. 4AL states ‘To ensure no potential impacts on birds utilising adjacent habitats. Any night working would be agreed in advance with the local authority, and the restrictions outlined within the Outline CEMP (document reference TR010035/APP/7.2)’. However, agreeing night working measures in advance with the LPA is not considered an acceptable form of mitigation for the HRA, and as already stated, we can find no reference to any restrictions included within the Outline CEMP. Natural England considers that night time working could have a detrimental impact on the mitigation area and therefore this issue needs re analysing as part of the HRA and appropriate restrictions including within the HRA, CEMP, REAC and DCO to prevent any impacts on wintering SPA and Ramsar species</p>	<p>Additional text will be added to paragraph 7.4.12 of Revision 2 of the Habitats Regulations Assessment (document reference TR010035/APP/5.4 – Rev 2) to provide further details of potential night working requirements during the construction phase of the Scheme.</p> <p>Commitment 4AL within the Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3 - Rev 1) will be updated to include further detail of night time restrictions. There would be no significant adverse disturbance / displacement effects associated with night time working.</p> <p>Revision 2 of the Habitats Regulations Assessment and Revision 1 of the Record of Environmental Actions and Commitments will be issued to the Planning Inspectorate at Deadline 2.</p>
HRA - Noise Disturbance		
19.14	<p>We previously advised that – ‘the HRA should include the existing baseline and what the predicted noise levels will be (measured in LAeq and LAm_{ax}). We also expect to see mitigation measures (e.g. acoustic hoarding) being built into the proposed development that would negate / reduce noise impact if required.</p>	<p>It was not considered necessary to include predicted noise levels (LAeq or LAm_{ax}) as the assessment assumes that birds within 300m of the Scheme could be affected by noise disturbance, therefore mitigation land has been included on this basis. The inclusion of the mitigation land (which will provide alternative habitat for birds during the construction phase of the Scheme) also negates the need to include additional acoustic hoarding (specifically for noise disturbance of birds) during the construction phase of the Scheme.</p>
19.15	<p>We note that a noise report has now been submitted and is referenced in the HRA (Environmental Statement Chapter 6.11) however this report is based solely on human receptors and does not include any consideration of birds as sensitive receptors.</p>	<p>Chapter 11: Noise and Vibration (document reference TR010035/APP/6.11) has been undertaken in accordance with the methodology outlined within the Design Manual for Roads and Bridges (DMRB). Birds are not defined as a sensitive receptor within the methodology, although, designated sites are. There were no Ramsar sites, Special Areas of Conservation, Special Protection Areas or Sites of Special Scientific Interest identified within the noise study area, therefore the assessment did not assess effects on these features. Reference to the noise assessment outlined in Chapter 11: Noise and Vibration (document reference TR010035/APP/6.11) in relation to birds will be removed from Revision 2 of the Habitats Regulations Assessment (document reference TR010035/APP/5.4 – Rev 2). The assessment assumes that birds with 300m of the Scheme could be affected by noise disturbance and the mitigation land has been included within the Scheme. Revision 2 of the Habitats Regulations Assessment will be issued to the Planning Inspectorate at Deadline 2.</p>
19.16	<p>The HRA acknowledges that there is potential for noise impacts throughout the construction period but gives no information or summary of where the greatest risk may occur.</p>	<p>Given the inclusion of the mitigation area, it was not deemed necessary to identify specific locations within the Scheme where noise impacts may occur to a greater or lesser degree, as part of the Habitats Regulations Assessment (document reference TR010035/APP/5.4 – Rev 2)</p>

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
19.17	The HRA cites an increase in noise levels of 0 – 5db but again gives no details of where, when or what distance to the sensitive bird receptors.	<p>as with the bird mitigation land in place it is considered there would be no significant effects on the integrity of the Special Protection Area /Ramsar site.</p> <p>The construction phasing would be finalised following the appointment of the main works contractor. A commitment has been included within Revision 1 of the Record of Environmental Actions and Commitment (document reference TR010035/APP/7.3 – Rev 1) to state the contractor (once phasing has been finalised) will include sections of the Scheme considered to be sensitive, what constitutes loud activities and what would be avoided at high tide within the final Record of Environmental Actions and Commitments. Natural England will have opportunity to comment on the final Record of Environmental Actions and Commitments when the contractor issues it to discharge the Development Consent Order Requirements.</p> <p>Revision 1 of the Record of Environmental Actions and Commitments will be issued to the Planning Inspectorate at Deadline 2.</p>
19.18	Appendix 5 of the submitted HRA includes a table of how Highways England have taken into account Natural England's previous comments. HRA paragraph 7.3.4 it states that 'Acoustic hoarding has been incorporated into the Scheme design'. However, it is not clear whether this is as part of the construction period or at end use and there are no further details regarding this within the HRA. This should be clarified. Therefore, we consider that this part of the HRA, including the conclusions at paragraph 7.4.23 needs to be re-assessed.	<p>Acoustic hoarding and bunding is embedded into the operational design of the Scheme and presented on the Environmental Masterplan (document reference TR010035/APP/6.19). Text will be added to Revision 2 of the Habitats Regulations Assessment (Section 7.7.4) (document reference TR010035/APP/5.4 – Rev 2). Revision 2 of the Habitats Regulations Assessment will be issued to the Planning Inspectorate at Deadline 2.</p> <p>As noted above the inclusion of the mitigation land (which will provide alternative habitat for birds during the construction phase of the Scheme) negates the need to include additional acoustic hoarding (specifically for noise disturbance of birds) during the construction phase of the Scheme.</p>
19.18	We would also disagree with the conclusion that 14 significant counts of flocks of SPA birds during the two-year survey period doesn't demonstrate regular use. Natural England has already agreed the 300m buffer and the work to ID the relevant SPA species within this buffer has been completed and has shown, what Natural England considers to be, a significant number of SPA species using the land within the 300m buffer. In addition, given that there are significant numbers of three SPA species (pink footed goose, lapwing and curlew) within the 300m buffer, the total habitat loss is 48ha and the construction period covers two winter periods, it's our advice that mitigation for noise disturbance, in addition to the bird mitigation area, is required to avoid an adverse effect on the integrity of the SPA and Ramsar site.	The Habitats Regulations Assessment (document reference TR010035/APP/5.4) accepts that there will be an increase in noise disturbance during construction within 300m of the Scheme. However, given the limited number of records of significant numbers of birds and taking into account that half of the 14 flocks comprising 1% or greater of Special Protection Area species were recorded in close proximity to the existing A585 road (and therefore already subject to noise disturbance), provision of an alternative feeding area away from the construction area is considered to provide the most effective mitigation. This is considered sufficient to avoid an adverse impact on the integrity of the Special Protection Area, without requiring further noise mitigation measures.
19.19	The REAC reference no. 4Z states that – 'Construction works would be phased to allow the most sensitive sections of the Scheme to be constructed outside of the winter months. In addition, avoiding particularly loud activities at high tide when birds are more likely to be utilising inland habitats...'. This sentence is also repeated in the Environmental Statement Chapter 8 Biodiversity (paragraph 8.6.8). Natural England supports this however there are no details as to which sections of the project are considered to be sensitive and what constitutes loud activities. This should be clarified and represented in the HRA.	The construction phasing would be finalised following the appointment of the contractor. A commitment will be included within Revision 1 of the Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3 – Rev 1) to state the contractor (once phasing has been finalised) will include sections of the Scheme considered to be sensitive, what constitutes loud activities and what would be avoided at high tide within the final Record of Environmental Actions and Commitments. Natural England will have opportunity to comment on the final Record of Environmental Actions and Commitments when the contractor issues it to discharge the Development Consent Order Requirements. Revision 1 of the Record of Environmental Actions and Commitments will be submitted to the Planning Inspectorate at Deadline 2.
HRA – Vibration		
19.20	The only reference within the HRA to vibration relates to the report written for the Environmental Statement - Chapter 11 Noise and Vibration. There is no assessment within the HRA to look at the likely significant effects from vibration impacts during	Consideration of vibration from piling (the main source of vibration as a result of the Schemes construction) will be included within Section 7.4 of Revision 2 of the HRA (document reference TR010035/APP/5.4 – Rev 2). There would be no significant effects. Revision 2 of the Habitats

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
	construction. As previously stated, the Noise and Vibration report has been written based solely on human receptors and does not include any consideration of birds or habitats as sensitive receptors. Therefore, we are concerned that there is no assessment of vibration impacts on SPA species within the HRA or within the Environmental Statement and this should be remedied.	Regulations Assessment will be submitted to the Planning Inspectorate at Deadline 2.
Waterbird Assemblage		
19.21	Section 6.12 of the HRA summarises what should be considered at the Appropriate Assessment (AA) stage. This notes that waterbird assemblage should be considered in relation to disturbance/displacement and water quality (construction only); it does not include consideration of loss of forage/roosting habitat (construction or operation). It is unclear why this has been screened out and Natural England considers that this impact should be considered at AA. The consideration of construction impacts within the AA relating to impacts to water quality does not include any consideration of the waterbird assemblage (HRA paragraphs 7.5.3 to 7.5.5).	Assessment of the waterbird assemblage has been included within Sections 6.8 and 7.4.54 (as required) and Table 14 (Section 6.12) (document reference TR010035/APP/5.4 – Rev 2). The updated HRA will be submitted to the Planning Inspectorate at Deadline 2. Paragraphs 7.5.3 to 7.5.5 of the Habitats Regulations Assessment (document reference TR010035/APP/5.4) relate to in-combination water quality effects therefore the waterbird assemblage has not been specifically assessed in these paragraphs.
19.22	HRA paragraphs 7.7.9 to 7.7.11 consider Operational Loss of Foraging/Roosting Habitat but does not include consideration of the waterbird assemblage.	Reference to and assessment of the waterbird assemblage will be included within Revision 2 of the Habitats Regulations Assessment within Section 7.7 (document reference TR010035/APP/5.4 – Rev 2). There is no change to the conclusions reported. Revision 2 of the Habitats Regulations Assessment will be submitted to the Planning Inspectorate at Deadline 2.
19.23	The HRA table 23, paragraph 7.8.2 does not address waterbird assemblage relating to disturbance or loss of foraging/roosting habitat.	Reference to and assessment of the waterbird assemblage will be included within Revision 2 of the Habitats Regulations Assessment within Section 7.8 (document reference TR010035/APP/5.4 – Rev 2). There is no change to the conclusions reported. Revision 2 of the Habitats Regulations Assessment will be submitted to the Planning Inspectorate at Deadline 2.
19.24	The overall conclusion (HRA paragraphs 8.1.1 to 8.1.4) does not refer to the waterbird assemblage.	Reference to and assessment of the waterbird assemblage will be added to Revision 2 of the Habitats Regulations Assessment (document reference TR010035/APP/5.4 – Rev 2) within Section 8.1. There is no change to the conclusion reported. Revision 2 of the updated Habitats Regulations Assessment will be submitted to the Planning Inspectorate at Deadline 2.
Environmental Statement Chapter 8 Biodiversity – Wyre-Lune proposed Marine Conservation Zone		
19.25	We note the inclusion of paragraph 8.5.7 identifying the Wyre-Lune recommended Marine Conservation Zone (rMCZ) as being partially within the draft order limits however, the MCZ is now a proposed MCZ (pMCZ) since 8 June 2018 and therefore must now be treated as a material consideration for all proposals. Therefore, the Environmental Statement should now be updated to reflect the current position of the pMCZ.	A separate MCZ screening assessment has been undertaken and issued to the Marine Management Organisation to inform the application for a Marine Licence. As noted above the works considered to be 'marine works' are minor. No updates will be made to Chapter 8: Biodiversity (document reference TR010035/APP/6.8) as the change from a recommended MCZ to a proposed MCZ would not change the conclusions of the assessment on this receptor. The pMCZ was assessed in Chapter 8 as though it was a MCZ. A Changes and Corrections Document (document reference TR10035/APP/7.11) will be submitted at Deadline 2 and this update will be included within it.
19.26	In addition, in accordance with Section 126 of the Marine and Coastal Access Act (MCAA) (2009), this guidance, an MCZ assessment should also be completed to fully assess the impact of the project on the pMCZ and to allow the DCO to grant a Deemed Marine Licence. The Environmental Statement Chapter 8 Biodiversity should also be updated with the conclusions from the MCZ assessment.	As above.
Outline CEMP – Appendix B Bird Mitigation Strategy		
19.27	There is still an agreed, outstanding matter to be resolved concerning Highways England obtaining the shooting rights around the mitigation area for the duration of the construction period. However, after reviewing the submitted strategy we are concerned that the reference to removing the shooting rights from the foreshore as	The Applicant is currently engaging with the Duchy of Lancaster Land Agents about shooting rights in the bird mitigation area during the construction phase of the Scheme. The Bird Mitigation Strategy appended to the Outline Construction Environmental Management Plan (Appendix B) (document reference TR010035/APP/7.2) submitted to the Inspectorate included

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
	well as from the surrounding fields has been removed from the submission version. The strategy should be amended to clarify that, in order for the mitigation site to be effective, all the shooting rights from the surrounding fields and the foreshore will be removed for the duration of the construction works.	a section on obtaining shooting rights i.e. it was not omitted – refer to Section 2.4. At Deadline 2 Revision 1 of the Bird Mitigation Strategy will be submitted which will outline an updated position regarding shooting rights.
Soils, including Best and Most Versatile (BMV) Land		
19.28	The majority of the land within the project is considered to be BMV land and there is currently no direct mitigation proposed for the loss of the agricultural land. The land is predominantly grass for silage/haylage and grazing with some land under arable production. No detailed ALC survey has been carried out. The ALC data which has been provided is for strategic planning purposes and should not be presented at a scale greater than 1:250 000. This data has been presented at 1:20 000 which is misleading. It does however show that there is the potential for a significant area of BMV land to be affected.	It is accepted that the available Agricultural Land Classification (ALC) mapping used for the assessment in Chapter 10: People and Communities (document reference TR010035/APP/6.10) of the Environmental Statement is only for strategic purposes, and this is stated in paragraph 10.6.3. Presenting the mapping at a scale of 1:20,000 was undertaken to allow the extent of the Scheme to be understood in detail and was not meant to be misleading and the worst-case scenario (all land comprises Best and Most Versatile (BMV) land) was assessed to take account of this.
19.29	We understand that Highways England propose to carry out an ALC survey prior to the commencement of construction and Natural England has agreed this approach on the basis that the current assessment is based on a worst-case scenario. A Requirement therefore should be added to the DCO for Highways England to undertake the ALC survey prior to construction works commencing and that survey should be submitted to Natural England for comment before the Requirement is discharged.	A commitment to undertake soil surveys (which would gather ALC information) is included within the Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3) which is secured by Requirement 4 of the draft Development Consent Order (document reference TR010035/APP/3.1). Before Requirement 4 is discharged, as part of the standard process Natural England would have opportunity to comment.
19.30	The submitted soil data has also been presented incorrectly. This data should be presented at 1:250 000 and it has been enlarged to 1:15 000. This data is not suitable as a substitute for a Soil Management Plan or a detailed Soil Resource Survey. We understand that a Soil Management Plan has been written however, this may have to be amended because the Soil Resource Survey will inform the Soil Management Plan.	As previously noted, the scale used was to allow the detail of the Scheme to be visible. A draft Soil Management Plan (SMP) has been written and is contained in Appendix D of the Outline Construction Environmental Management Plan (document reference TR010035/APP/7.2). This document requires a pre-construction soil survey to be undertaken to inform the final version developed by the contractor. There is also a commitment within the Record of Environmental Actions and Commitments (commitment 6G) (document reference TR010035/APP/7.3) which states ' <i>Soil handled and stored in line with Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. Full details will be presented in a Soil Management Plan which will be informed by a detailed soil survey undertaken in advance of any soil stripping operations commencing.</i>
19.31	We note the commitment to producing a Soil Resource Plan as part of the Outline CEMP, this should be provided prior to construction for agreement with Natural England to check that the soil resource is being adequately protected and properly handled.	A commitment to prepare a Soil Resource Plan (SRP) is included within the Record of Environmental Actions and Commitments (Commitment 1B) (document reference TR010035/APP/7.3) which is secured by Requirement 4 of the draft Development Consent Order (document reference TR010035/APP/3.1). Before Requirement 4 is discharged, as part of the standard process Natural England would have opportunity to comment.
19.32	Without the ALC and soil survey, a mitigation plan cannot be written as per the National Policy Statement for National Networks (paragraph 5.179). A Requirement for the production of this mitigation plan should be included within the Draft DCO and Natural England would like to comment on this Plan before it is considered acceptable.	The commitment to prepare the final Soil Management Plan and Soil Resources Plan is included within the Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3) which is secured by Requirement 4 of the draft Development Consent Order (document reference TR010035/APP/3.1). Before Requirement 4 is discharged, as part of the standard process Natural England would have opportunity to comment.
Protected Species – Great Crested Newts		
19.33	The information which has been submitted as part of the draft licence is inconsistent, un-clear and is in-adequate to assess what habitat is being lost and what habitat is being provided as compensation. Therefore, Natural England is currently unable to assess the draft licence under the favourable conservation test.	An updated draft licence was issued to Natural England addressing all outstanding comments on the 3 April 2019.
19.34	Based on the current figures provided, it is Natural England's opinion that insufficient compensation has been provided to grant the licence under License Policy 1. Further information and assessment therefore need to be provided before Natural England	An updated draft licence was issued to Natural England addressing all outstanding comments on the 3 April 2019.

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
	can consider issuing a letter of no impediment. This may also necessitate alterations to the Environmental Statement Chapter 8 Biodiversity.	It is not envisaged that any updates to Chapter 8: Biodiversity (document reference TR010035/APP/6.8) are required.
Protected Species - Bats (various species)		
19.35	There an outstanding issue regarding Skippool Bridge (ref B5) and whether hibernacula roost surveys have been undertaken.	An updated draft licence was issued to Natural England addressing all outstanding comments including those relating to hibernacula roost surveys on the 3 April 2019.
19.36	We are also recommending that further surveys are undertaken for structure ref B1 and that further details are provided regarding the capture and exclusion during construction.	An updated draft licence was issued to Natural England addressing all outstanding comments relating to capture and exclusion during construction on the 3 April 2019. Further to this, updated surveys will be undertaken on all structures during the appropriate survey window in 2019 and this survey information will inform a 'final' licence application prior to construction.
RR-020 Ida Pinson		
20.1	<p>If this scheme goes ahead, I shall be directly affected.</p> <p>During any work and forever after it will be difficult for me to access the road network from my home.</p> <p>The services to my home- electricity, gas, water, communication, come in from the Barnfield Manor entrance, marked in red, where the work is planned.</p> <p>The surrounding area will change in character, becoming noisy, polluted and industrial in essence, which in turn will diminish my enjoyment of my home and as a consequence my home will lose value.</p> <p>I will suffer great disruption during the work. My anxiety levels are already high and I am concerned about the effect this will have on my health.</p> <p>I am concerned about the security of my property during the work.</p>	<p>Access to and from Barnfield Manor onto Lodge Lane will remain usable during the construction and operation periods. There would be a temporary diversion of Lodge Lane at the proposed bridge site during construction. On completion of the bridge, Lodge Lane would have the same arrangement as existing at the Barnfield Manor entrance.</p> <p>All services, where necessary, will have diversions in place prior to any works at the Barnfield Manor entrance starting. Therefore, all current services will continue to be usable during the construction period.</p> <p>The visual effects of the Scheme on Barnfield Manor are assessed in Chapter 9: Landscape (document reference TR010035/APP/6.9) as having a large adverse effect during the construction period, reducing to moderate adverse during the winter of year 1 (post construction) and reducing further to slight adverse 15 years after opening. Planting in this area includes initially planting an enhanced size stock providing additional screening at opening year with a greater percentage of evergreen varieties which would provide all year-round screening benefits. This is portrayed on Sheet 9 of the Environmental Masterplan (document reference TR010035/APP/6.19) (this will be secured within the Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3 – Rev 1) submitted at Deadline 2). Increases in road traffic noise levels generated by the Scheme in this location would be mitigated to a minimum through the implementation of low noise surfacing, a 2-metre-high noise barrier and the Scheme being in a cutting close to the property. Noise mitigation is presented on Figure 11.4 of the Environmental Statement Chapter 11: Noise and Vibration (document reference TR010035/APP/6.11) and on the Environmental Masterplan (document reference TR010035/APP/6.19). No further mitigation is necessary as the assessment concludes that noise would be below a level where significant adverse effects on health would occur.</p> <p>Environmental Statement Chapter 6: Air Quality (document reference TR010035/APP/6.6) presents an assessment based on detailed air quality modelling which was undertaken for a number of worst-case receptor locations, including properties close to the Scheme. All predicted air quality concentrations at these locations were below the respective air quality objectives, and the assessment determined that the Scheme would not have a significant effect on local air quality.</p> <p>The Applicant and appointed contractor will ensure a robust security perimeter around the site is provided; there is no expected impact on the security of the local area. None of the homes in the Barnfield Manor complex or their boundaries would be directly affected by the Scheme so security of those homes would not be altered by the Scheme.</p>
20.2	I am greatly distressed about the fate of wildlife in the area around my home. I am a paid up member of Lancashire Wildlife Trust and RSPB, this really matters to me.	The Scheme as a whole is providing a biodiversity net gain which is demonstrated in Appendix 8.9: Biodiversity Metric Calculations (document reference TR010035/APP/6.8.9). Significant

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
		mitigation and enhancement is proposed for local wildlife and presented on the Environmental Masterplan (document reference TR010035/APP/6.19). A Biodiversity Enhancement Strategy (Appendix C of the Outline Construction Environmental Management Plan (document reference TR010035/APP/7.2)) has also been prepared for the Scheme which includes measures such as providing bee posts, reptile hibernacula, bird boxes and wildflower meadow. Monitoring of mitigation and enhancement measures would be finalised by the contractor, however, details can be found within the Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3) which commits the contractor to monitoring for three years post construction.
20.3	During the meetings about the scheme to date I felt that my concerns were not listened to. I also felt that the people trying to explain the scheme lacked local knowledge and understanding	Feedback provided to the team during the non-statutory and statutory consultation events was considered as part of the assessment. The Consultation Report (document reference TR010035/APP/5.1) Section 5, Appendix R and Appendix S, summarises the key concerns that were raised by members of the public and how the Scheme had regard to them.
RR-021	Public Health England	
21.1	Thank you for your consultation regarding the above development. Public Health England (PHE) welcomes the opportunity to comment on proposals at this stage of the project. We have considered the documentation accompanying the application for development consent and can confirm the following: - We have previously commented on this application at both the scoping stage of the project (1st December 2017), and at the public consultation stage (23rd December 2018).	Noted – no further response required.
21.2	At both scoping stage and public consultation stage we requested the inclusion of the assessment of fine particulate matter (PM2.5) within the air quality section. We note that this has not been performed. However, there is a generic justification that “Highways England has reviewed the latest measured PM2.5 concentrations collected across the UK and calculated increases in PM2.5 associated with an example of a large increase in vehicles by the edge of a motorway. On the basis of this, Highways England determined that there is no risk that an individual scheme would exceed the PM2.5 EU limit value and consequently, Highways England has not undertaken an assessment of PM2.5 for this Scheme”, there is also the site-specific justification that “Although PM2.5 has not been specifically modelled in accordance with DMRB, the PM10 results illustrate that there would be no exceedances of the PM2.5 of the EU Limit Value of 25?g/m³. The maximum PM10 concentration being 16.1?g/m³, the PM2.5 fraction would therefore be much lower, well below the 25?g/m³ EU Limit Value.”	Noted – no further response required.
21.3	Reducing public exposures to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards has potential public health benefits and is in accordance with the Clean Air Strategy. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure), and maximise co-benefits (such as physical exercise) and encourage their consideration during development design, environmental and health impact assessment, and development consent.	Noted – no further response required.
21.4	PM2.5 is of particular interest with regard to transport emissions and the impact of air quality upon public health and reducing public exposures to non-threshold pollutants (such as particulate matter) below air quality standards has potential public health benefits. However, in this instance, we consider that enough justification has been provided for PHE not to register an interest as a consultee for the next stage of assessment.	Noted – no further response required.

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
RR-022	Gary Shuttleworth	
22.1	<p>1. Adequacy of consultation. For example, but not limited to, the first consultation carried out in September 2016 presented just two 'options' only one of which was a bypass. No alternative bypass routes have been put to the public for consideration. HE's preliminary optioneering without public engagement considered a range of options. This included five southern corridor options (S1-S5), two northern corridor options (N1 and N2) and two online corridors (O1 and O2). Nine options in all. Seven options were dropped before the people living in the vicinity were engaged through consultation. Of the two options the first non-statutory consultation set out, only one was a bypass route, the second was enhancements to the existing A585 route. Between stage one and two consultations, Option 1 was further developed on the basis that there was over 70% support for the bypass in the first consultation. We believe the latter was support for 'a' by pass and not 'the' bypass. It is not a surprise that local residents will want a bypass. Where the local views are most important is in providing guidance on the best way of providing the bypass. It seems that, as only one option has been pursued, the potential of local people influencing 'by pass' options has been avoided as a result of the process HE have adopted. The 2018 consultation was the first consultation where legal stipulation to 'have regard to' the responses of consultees applied, yet no alternative by-pass options were available and the main decisions have been taken.</p>	Refer to response in RR-003 (3.1)
22.2	<p>2. The scheme will not achieve its congestion relief objectives as set out in the DCO materials. As already evidenced by the work on Windy harbour A585 improvements, the congestion is only moved to a different location on the A585 and overall not reduced. If a true benefit is to be realised, then a solution for the A585 from M55 is required.</p>	Refer to response in RR-001 (1.2)
22.3	<p>3. Highways England have declared the benefit expected from the scheme as; "Travel time savings of between 2 and 4.5 minutes per journey are forecast to be saved by road users due to the Scheme." This is a negligible saving and given that this is an estimate there must be the possibility that this could make no difference, or in fact create a longer journey time. For all the minutes added onto journey times through the construction period, how long will this scheme take to offer a net benefit?</p>	Refer to response in RR-003 (3.3)
22.4	<p>4. Given the negligible benefit, how can this scheme pass a value for money test or justify the disruption, including environmental impact, that the construction period would create whilst only moving the A585 bottleneck to a different location on the road.</p>	<p>A comprehensive Environmental Statement has been prepared for the Scheme (documents reference TR010035/APP/6.1 - TR010035/APP/6.20) using agreed methodology. Each Environmental Statement chapter assesses the residual impacts on the environment following the implementation of mitigation. A summary of the environmental impacts of the Scheme is presented in Chapter 17: Summary (document reference TR010035/APP/6.17). The Scheme overall provides a net biodiversity gain as outlined within Environmental Statement Appendix 8.9: Biodiversity Metric Calculations (document reference TR010035/APP/6.8.9). Operational mitigation is provided on the Environmental Masterplan (document reference TR010035/APP/6.19).</p> <p>The delay to road users during the construction period due to traffic management and speed restrictions is taken into consideration and is quantified as part of the economic assessment of the Scheme. The impact of the Scheme on traffic distribution across the highway network has been assessed and can be found in the Scheme Combined Modelling and Appraisal Report (document reference TR010035/APP/7.12) Appendix F and H.</p>
22.5	<p>5. Safety is a concern. Specifically for our access from our house onto the proposed</p>	Refer to response in RR-003 (3.5)

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
	scheme. Also additional consents have been secured where Highways England have been consultees in approving at least 2 schemes in 2018 to add additional connections to the A585 either side of the proposed connection of the bypass at Skippool.	
RR-023	Helen Shuttleworth	
23.1	<i>Same RR text as RR-022</i>	Refer to response in RR-022
RR-024	Singleton Hall Management Company Ltd	
24.1	<i>Refer to RR-028</i>	Refer to response in RR-028
RR-025	Peter Merrick	
25.1	A. The first time I was made aware of the proposed bypass I was informed that there was an option of either this proposed bypass or improvements to the present route i.e. the A585. Having spoken to other people affected by this scheme it would appear that no-one was informed of any other proposed bypass and we are under the impression that there are other alternatives. I do not disagree that something needs to be done but with adequate consultation over all potential solutions not just this one.	Refer to response in RR-003 (3.1)
25.2	B. The proposed scheme will have the affect of just moving the bottlenecks from where they are now to a short distance either up or down the road depending on the direction of travel. This has been evidenced by the recent "improvements" which have had the same results at the Windy Harbour junction.	Refer to response in RR-001 (1.2)
25.3	C. The proposed plan will have the effect of re-directing more traffic through Singleton village as any one who wishes to avoid the new bottlenecks that will be created will use that route to get to the M55 i.e. along Lodge Lane and down Mile Road. The speed limit through Singleton Village has recently been reduced to 20mph because of the amount and speed of traffic.	The Scheme transport model covers a wide area, focusing on the road network to the north of the M55 and to the west of the M6, including the principal settlements as shown in Figure 3.9 in Transport Assessment (document reference TR010035/APP/7.4) Section 3. The area wide changes in traffic volume forecast for 2037 are presented in Transport Assessment Section 5.2 and Appendix A (document reference TR010035/APP/7.4). This predicts that the traffic flows on Lodge Lane will be slightly higher northbound (most notably in the AM peak) but will reduce in the southbound direction in all time periods.
25.4	D. The suggested time savings on the new bypass are estimated to be 2 to 4.5 minutes which is laughable in itself but does not take into consideration the time lost because of the delays to get onto the new bypass or off it because of the pinch points at either end.	Refer to response in RR-003 (3.3)
25.5	E.I would suggest the cost for this "time saving" is not justified.	Refer to response in RR-003 (3.3 and 3.4)
RR-026	P Wilson & Company on behalf of Mr and Mrs Moreton	
26.1	Dear Sirs, Our Clients – Garth and Helen Moreton Property – The Beeches, 205 Mains Lane, Poulton le Fylde, Lancashire, FY6 7LB Scheme – A585 Windy Harbour to Skippool Improvement Scheme DCO HAL18252 We are instructed to act by our above-named clients in respect of their above named property that is affected by the above proposed scheme. Our clients have instructed us to object to the scheme so far as it affect their property on the grounds that the extent of the land take that Highways England propose to acquire around their property is excessive and not all required for the delivery of the scheme. Please take this letter as our client's formal objection to the above proposal. We reserve our client's right to make further comments or objection and to appear on their behalf at any subsequent proceedings or enquiries into the above property.	Sections 4 and 5 of the Statement of Reasons (document reference TR010035/APP/4.1) outline the reasons for compulsory acquisition of land.
RR-027	Clerk Singleton Parish Council on behalf of Singleton Parish Council	

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
27.1	<p>A bypass for the A585 to enable motorists to join the motorway system and the wider road network is urgently required. However, this scheme cannot solve the problem as it is introducing 3 extra traffic signalled junctions to replace a roundabout and 1 signalled junction. Traffic will be further slowed.</p> <p>The proposed bypass feeds into a 2-lane road. Traffic hits this bottle neck and can only proceed at the speed of the slowest vehicle.</p>	<p>The Applicant does not agree that the traffic would be slowed. There are currently 2 signalised junctions and a roundabout within the Scheme limits. The proposal is to change the roundabout to a signalised junction. The Scheme will introduce two additional junctions, Skippool Bridge junction and Poulton junction, both of which will be signalised. By having the junctions all signalised, the Scheme introduces standardisation of junctions and continuity to the road user, the effect of which would be to facilitate the free-flowing of traffic and prevent slowing. All the junctions will be operated using a Microprocessor Optimised Vehicle Actuation (MOVA) system, including the existing Windy Harbour junction. This will enable further control of traffic flow and reduce bottle necks.</p>
27.2	<p>The very dangerous Thistleton junction has not been included in the schemes proposals.</p>	<p>The junction is beyond the scope of this proposal. The Applicant is aware of issues with the junction and further work is being undertaken by Applicant. The Scheme does not have a negative impact on the junction, with a forecast reduction in traffic flows through the junction there is less potential for conflict with the predominant flow on the A585 Fleetwood Road.</p>
27.3	<p>The roundabout at J3 of the M55 is too small to take all the traffic it is required to do and was never intended for this amount of traffic.</p>	<p>The junction is beyond the scope of this proposal and an improvement scheme is currently being considered for the M55 junction 3.</p>
27.4	<p>Pollution, noise, community fragmentation and danger at all the junctions will be greatly impacted, especially at Greenhalgh.</p>	<p>Chapter 6: Air Quality (document reference TR010035/APP/6.6) of the Environmental Statement notes that while there are predicted to be very small increases in air quality concentrations at junction locations in Greenhalgh (nitrogen dioxide (NO₂) concentrations increase at R19 and R25 by 0.7µg/m³ and 0.2µg/m³, respectively (see Figure 6.4 of the Environmental Statement for receptor locations)), air quality concentrations are well below the respective air quality objectives (40 µg/m³), and it was determined that the Scheme would not have a significant effect on local air quality.</p> <p>The noise assessment presented within Environmental Statement Chapter 11: Noise and Vibration (document reference TR010035/APP/6.11) indicates in Table 11.28 and 11.32 that with the Scheme road traffic links outside of the detailed noise study area (approximately 1km from the Scheme) are predicted to experience either no change or negligible adverse changes in road traffic noise. Increases in road traffic noise around the Greenhalgh area are predicted to be negligible and would be imperceptible to the human ear.</p> <p>Environmental Statement Chapter 10: People and Communities (document reference TR010035/APP/6.10) assesses new severance as a result of the Scheme which includes an assessment of footpath severance and severance of community facilities. The assessment concludes that '<i>Severance impacts have been assessed as slight, this would not be significant in terms of EIA.</i>'</p> <p>The impact at Greenhalgh will be negligible as a result of the Scheme. The Highways England Operations Directorate is conducting feasibility studies for the A585/B5269 (Thistleton/Mile Road) separate to the A585 Windy Harbour to Skippool improvement Scheme.</p>
27.5	<p>No thought given to the wider impact of increasing traffic from the new industries and new housing developments throughout the Fylde peninsular.</p>	<p>The Transport Assessment (document reference TR010035/APP/7.4) section 3.3.24-3.3.32 summarises how extra traffic from committed developments is included in the traffic modelling. Section 3.3.27 to 3.3.32 describes how information from local authorities was collected. Each individual development was then classified as per Table 3.4. Any development that was classed as near certain or more than likely; developments under construction or approved development proposals or developments with a planning application within the consent process; were included in the Core Scenario forecasts. All other developments were classed as reasonably foreseeable and included in the Optimistic Scenario. The information from local authorities was collected in November 2017. Future development which is less</p>

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
		<p>certain such as Wyre Council Site SA4 Hillhouse Technology Enterprise Zone, Thornton and the Wyre Council Site SA5 Port of Fleetwood development proposals for example were categorised as reasonably foreseeable and included in the optimistic scenario based on the classification criteria described above.</p> <p>As stated in the Transport Assessment the Scheme includes future provision for traffic growth in the area. The A585 mainline traffic flows are not forecast to reach capacity by the design year 2037 showing that the Scheme mainline has reserve capacity to support future development in the area.</p>
27.6	<p>The proposal is a terrible waste of public money and will not improve the traffic problems.</p>	<p>The Scheme has been assessed environmentally, operationally and economically and is shown to provide value for money (refer to response in RR-001 (1.1)). Furthermore, the Scheme improves road user journey times and road user reliability and further details can be found in the Scheme Combined Modelling and Appraisal Report (document reference TR010035/APP/7.12) Appendix F and G.</p> <p>The Scheme mainline has reserve capacity to support future development in the area.</p> <p>An overall objective of the Scheme, to improve safety along the route, will be achieved as the Scheme, if implemented, is shown to reduce the number of accidents.</p> <p>The Scheme reduces severance for walkers, cyclists and horse riders and improves access across the existing A585 between the Little Singleton and Skippool junctions.</p> <p>The reduced traffic flow on the de-trunked section due to the Scheme would improve the local environment along the de-trunked section and should encourage walking and cycling.</p>
RR-028	Richard Turner & Son on behalf of Singleton Hall Management Company	
28.1	<p>Representations in respect of A585 Windy Harbour to Skippool Improvement on behalf of Singleton Hall Management Company.</p> <p>The following representations are made by Richard Turner & Son, 14 Moss End, Crooklands, Milnthorpe, LA7 7NU on behalf of Singleton Hall Management Company. The representations are made following receipt and consideration of emails sent to Kenneth Carter (Director of the Company) by Highways England and Arcadis and with reference to the plan entitled A585 Windy Harbour to Skippool Improvement Scheme proposed access to Singleton Hall submitted to Mr Carter.</p>	<p>Noted – no further response required.</p>
28.2	<p>1. Please confirm that the ownership of the new access road will be transferred to Singleton Hall Management Company Ltd free of any restrictions, liability, conditions other than those presently on the current road. Please also confirm there will be no new rights granted or reserved along the road to parties who do not presently have such a right.</p>	<p>The ownership and rights of the access track will be the same as the existing arrangement, which is all Singleton Hall Management Company's responsibility.</p>
28.3	<p>2. At the eastern end of the proposed new access track to Singleton Hall on the northern boundary of the access track, there is a gate shown which would give access to land which lies within the order area. Is it the intention that Highways England will have an access point at that position to land included in the order area? If so, the Management Company would wish to object to this as the current access track is a private residential access track for use by Singleton Hall, Singleton Manor and the Coach House.</p>	<p>Occasional access will be required by the Applicant for maintenance of the southern retaining wall and to the parcel of land between the Manor's north boundary and the bypass. Both of which will remain the Applicant's responsibility.</p>
28.4	<p>3. The fencing to the north side of the new access track shows a verge and then a safety fence behind which there would be proposed linear planting (hedge) and then proposed environmental barrier (fence). Behind that will be the retaining wall.</p>	<p>The specification would be in accordance with the Highways England's Design Manual for Roads and Bridges standards (TD19/06) and BS EN 1317. The specification for the barrier will be developed at detailed design stage.</p>

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
	There is no description given of the nature of the safety fence and the company is concerned that the nature of this may be detrimental to the approach to the hall and affect its setting. Please give a specification for this and the Management Company reserves the right to pursue an objection to this if the specification is not acceptable	
28.5	4. We also note that a hedge will be planted behind the safety barrier and we note that the Management Company will be expected to maintain this and would be pleased if you could now give an indication of what access provisions there will be for the Management Company in respect of this.	The maintenance and ownership of the safety barrier would be the local highway authority's (Lancashire County Council's) responsibility. Maintenance access for the hedge would be available at the end of the safety barrier and would be the responsibility of the Management Company.
28.6	5. We also note that there is the environmental barrier behind the hedge and we assume that this is something that Highways England will maintain but have had no confirmation and would be pleased to receive confirmation of the same together with a specification for the barrier.	The environmental barrier will be owned and maintained by the Applicant and the safety barrier will be owned and maintained by the Local Highway Authority (Lancashire County Council). The specification for the barriers will be developed at detailed design stage.
28.7	6. To the south of the new access track we have noted the planting which is to be amended from that shown on the plan and would be pleased to receive the plan showing the amended planting to enable a comprehensive response. We also note that a hedge will be planted behind which there is the proposed estate fencing.	Planting proposals are presented on the Environmental Masterplan (document reference TR010035/APP/6.19). An updated Revision 1 of the Environmental Masterplan will be submitted in due course.
28.8	7. The current access to the hall and the setting of the hall is such that the current access road has estate type fencing on both sides but it would appear that the new proposal has it on one side only, and even then behind a hedge. We would respectfully suggest that this will affect the setting of the Hall together with that of the Manor and Coach House. There is no indication given of the type of hedges which are to be planted adjacent to the access track. Please forward that information.	<p>All hedgerows would be native species planted as stated in the Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3), however species specification would be confirmed during the development of the detailed design.</p> <p>Estate fencing is a component feature of the landscape character in this location however it is not exclusively used. Currently the existing fencing is located adjacent to the equestrian pasture which is open in nature. Given the changes in the landscape and its features as a result of the Scheme together with the relocation of the access road and requirements from nearby visual receptors for visual screening a combination of hedgerow and estate fencing was considered as a suitable solution on the southern side of the access road.</p> <p>Due to the fencing requirements previously set out on the northern side of the access road an estate fence has not been proposed as it would not provide any visual / noise screening benefits and could result in additional visual clutter in this location.</p> <p>Requirement 5 of the dDCO (document reference TR010035/APP/3.1) requires a landscaping scheme to be designed and discharged prior to construction.</p> <p>Singleton Hall is a non-designated heritage asset of low heritage value. Its setting is primarily influenced by its location within Singleton Park and associated buildings (refer to Environmental Statement Appendix 7.1: Desk Based Assessment - document reference TR010035/APP/6.7.1). The change in estate type fencing at the side of the access track would not result in a change of setting to Singleton Hall (refer to Section 7.7.32 of the Environmental Statement Chapter 7: Cultural Heritage (document reference (TR010035/APP/6.7))).</p>
28.9	8. We remain concerned regarding sight lines where the new access joins onto Lodge Lane and the plan provided which is to show sight lines of 4.5 metres by 120 metres shows the point to which the 4.5 metres is set back to one side of the access and not centrally located on it. The access is very close to the fencing/parapets of the Lodge Lane bridge and the plan would indicate there is no verge between the edge of the access track and the bridge fence/parapet. We believe that these issues need addressing to show whether appropriate sight lines are available. We also believe that there should be a gap between the edge of the access track and the bridge structure.	The new access has been designed in accordance with national standards (national standards (Section 2 of the DMRB standard TD 41/95 "Vehicular Access to All-Purpose Trunk Roads"). The sight lines of 120 metres in either direction are based from the centre of the egress lane, in addition the vertical alignment of Lodge Lane will remain as per existing. The arrangement of the proposed access track allows for a verge between the track and the parapet on the structure, therefore the parapet will not affect the sight lines.

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
28.10	9. The works identified within the application allow for the diversion of services for Singleton Manor but have made no provision for diversion of services for Singleton Hall. The Management Company require all mains services which we believe currently come along the verge to the access road are diverted so that mains services are maintained at all times for the Hall.	Utilities services will only be diverted where found to be conflicting with the proposed works. Diversions will be carried out prior to any works affecting the utilities. The appointed contractor in due course, will identify all utilities and undertake detailed design of the diversions. All main services will be maintained and usable to Singleton Hall.
28.11	10. We have also found no provision for the diversion of the outfall pipe from the current treatment plant at the hall which we believe will be severed by the construction of the road. Please provide details of HE proposals.	The arrangements of the outfall would be considered as part of the detailed design. The Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3) reference number 8X secures mitigation measures for private water supplies. As required a detailed assessment of groundwater levels and flows shall be undertaken during detailed design to fully understand the location of the outfall and any amendments would be agreed with the land owner.
28.13	11. There is no provision for noise attenuation from the new road as constructed for the benefit of the Hall and we request noise attenuation to be installed and look forward to discussing the same with HE.	Increases in road traffic noise levels generated by the Scheme in this location would be mitigated to a minimum through the implementation of low noise surfacing, a 2 metre high noise barrier and the Scheme being in a cutting close to the property. Noise mitigation is presented on Figure 11.4 of Environmental Statement Chapter 11: Noise and Vibration (document reference TR010035/APP/6.11) and on the Environmental Masterplan (document reference TR010035/APP/6.19). No further mitigation is necessary as the assessment concludes that noise would be below a level where significant adverse effects on health would occur.
28.14	12. Please provide details for the specification of the track to include the height of the kerb as we are especially concerned regarding vehicles driving up onto the verge if 2 vehicles need to do so to pass. In addition, we would suggest the installation of a blind spot mirror on the access track at the bend which will be created on the access track to assist with safety. We note the access is to be 5.5 metres wide but question whether this is wide enough for a HGV and a car to pass without difficulty. We request the installation of a passing place, say 10 metres long to allow for the provision of larger vehicles to pass. We request that the safety barrier is placed on HE land in a place where it has less visual impact and will not affect the setting and access to the hall.	The specification of the proposed access track would be developed as part of the detailed design. The standard specification would include a kerb with splay 75mm to 125mm. A spot mirror could be implemented to mitigate blind spots and the Applicant will raise this with the management company as part of the ongoing discussions. The maximum width for a haulage vehicle in the UK is 2.55 metres with some exceptions and with cars around 0.5 metres less, therefore providing sufficient space for the two vehicles to pass one another. The safety barrier will be the responsibility of the Local Highway Authority and will be located to not affect the access to the hall. The exact position of the barrier would be determined at the detailed design stage.
28.15	13. There is no detail or provision regarding the drainage of the access road which currently drains from the edge onto a grassed area. The installation of kerbs will mean this now needs a drainage system installing, otherwise there will be great danger from standing water, especially in cold weather when the road may become icy.	Drainage provision for the access road is included in the Scheme design. Details are provided in the Drainage Design Development Report, appended to the FRA (document reference TR010035/APP/5.2). Refer to drawing HE548643-ARC-HDG-S5-ML_003-DR-D-3047.
28.16	14. Singleton Hall Management Company require the lighting to be by the installation of 3 new matching lights rather than an attempt to re-locate one existing light and find other similar lights.	The Applicant can confirm that as part of the Works No. 74, 3 new matching lights will be provided adjacent to the access track
28.17	15. Singleton Hall Management Company require the stone gateway pillars which are a feature of the entrance to the Hall to be re-located at the new entrance. They request that this be agreed on the basis that they will arrange for their contractors to remove the stone gateway pillars prior to the scheme commencing for safekeeping pending completion of the new access and for re-siting once the new access has been built and for their costs to be reimbursed. They also require the installation of appropriate plaques and signage to indicate that this is a private road.	The Applicant can confirm that as part of the Works No. 74 the stone gateway pillars adjacent to North Lodge will be re-located to the new entrance onto Lodge Lane, along with plaques and signage. Further details regarding the re-provision of the pillars will be discussed with the management company.
28.18	16. Singleton Hall Management Company request confirmation that their reasonable Professional Fees in this matter will be met by the Acquiring Authority.	The Applicant's policy relating to the payment of fees is that we pay the Claimant's fee in accordance with the compensation code as an agent is entitled to recover the proper and reasonable fees for advising, preparing a claim for compensation for the acquisition of land and negotiating settlement. Each request is considered on a case by case basis.
28.19	17. We reserve the right to make further representations	Noted – no further response required.
RR-029	Tim Hancock – Shell UK Ltd re: Singleton Crossroads Service Station	

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
29.1	<p>Dear Sir</p> <p>Shell UK Limited - Singleton Crossroads Service Station - Singleton Crossroads</p> <p>I confirm that I am instructed on behalf of Shell U.K. Limited which owns the freehold interest in this strategic service station property. This service area provides opportunities for fuel and refreshment to the passing motorist and the proposals will seriously affect its trading position. Moreover, there is the possibility that the property will be adversely affected during the construction phase.</p> <p>Please accept this as a preliminary representation on behalf of Shell U.K. Limited against the adverse affect that the proposals would have on its freehold interest in the property.</p> <p>My client reserves the right to make further representations in relation to this matter. Please acknowledge receipt of this representation.</p> <p>Yours sincerely Tim Hancock</p>	<p>The Applicant has engaged with Shell during the process and information has been provided on the Scheme, timescales and clarification on any possible impact on the service station. It should be noted that disruption is likely to be limited to the post opening of the main bypass when changes would be made to the Little Singleton junction and de-trunking of the existing A585. During construction, access will be maintained to the service station and signage to the service station will be maintained.</p> <p>Access to the service station will continue to be available post opening of the bypass.</p>
RR-030	United Utilities	
30.1	<p>We have been involved in ongoing discussions with Highways England and they will be aware as the applicant we have significant network within the site boundary for the new road.</p>	<p>Noted, no further response required.</p>
30.2	<p>United Utilities looks to build a strong partnership with all stakeholders to aid sustainable development and growth within the region. We aim to proactively identify future development needs and share our information. This helps to:</p> <ul style="list-style-type: none"> • ensure a strong connection between development and infrastructure planning; • deliver sound planning strategies; and • inform our future infrastructure investment submissions for determination by our regulator 	<p>Noted, no further response required.</p>
30.3	<p>As mentioned, United Utilities has various significant water and wastewater networks in the vicinity of the preferred route, some with associated easements. We have previously provided estimates for water and wastewater diversions. We would like to remind you that all of our assets will need to be afforded due regard in the masterplanning process and you should be aware that serious complications could arise because our existing infrastructure passes straight through areas where the road is proposed. Based on the information provided to United Utilities to date, we do not have sufficient information to confirm that the scheme's impact on our interests in the area is acceptable. It is essential that early and continued detailed discussions take place with United Utilities, in a bid to negotiate and agree the necessary diversions and asset protection measures required to support the delivery of the proposed road scheme. Any future design activities will include the need to carry out modelling of United Utilities networks to assess whether the proposed estimate designs are viable. We recommend that Highways England instructs us to proceed with this work as soon as possible to mitigate the risk of a delay to the road scheme.</p>	<p>The Applicant is in the process of engaging with the design and build construction partner who will ultimately carry out the detailed design and construction of this scheme. As soon as the Scheme contract is awarded the construction partner will engage with United Utilities to progress these discussions and utility diversion designs.</p>
30.4	<p>On this basis, United Utilities must currently object to the proposal due to insufficient information regarding your scheme's impact on our networks and our existing customers' water and wastewater services</p>	<p>Noted, no further response required</p>
30.5	<p>Any future discussions will need to consider site investigation activities, methods of construction and day to day operation and maintenance of the scheme to ensure that the risk to our existing infrastructure or the levels of service we provide to our customers is minimised.</p>	<p>Noted. Discussions will be carried out during the detailed design stage, where C4 estimates will be instructed.</p>
30.6	<p>We would advise that consideration must be given to the disposal of surface water in</p>	<p>The Water Framework Directive Assessment (document reference TR010035/APP/5.6) and</p>

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
	the most sustainable way and that under no circumstance should surface water discharge directly or indirectly into the public sewerage system.	chapter 12 of the Environmental Statement (document reference TR010035/APP/6.12) set out the disposal of surface water.
30.7	If you wish to discuss this representation in greater detail then you can either contact myself or Paul Romanko – Project Engineering Manager, (Paul.Romanko@uuplc.co.uk).	Noted, no further response required.
RR-031	Wyre Council	
31.1	The Council supports the proposed development in principle subject to any identified environmental, social and economic benefits being clearly shown to outweigh any harm (that may arise both during construction and operation) that cannot be adequately mitigated.	Noted – no further response required
31.2	The Council is also pleased to see that further improvement works are being proposed for the A585 outside of and beyond the scope of this scheme at the Norcross roundabout junction, but still consider that this scheme and that scheme must be part of a wider, comprehensive project to improve the A585 from and including junction 3 M55 through to Fleetwood otherwise the benefits arising from improvements to some parts of the route will simply push the problem to other critical junctions or sections of the road where improvements are not being made. The result of such a lack of a comprehensive approach to the improvement of the route will be a dilution/diminution of the social, environmental and primarily economic benefits arising from the scheme.	Refer to response RR-001 (1.2)
31.3	The Council is about to adopt a new Local Plan covering the period up to 2031 which includes provision for housing growth and economic growth (principally through the development of a designated Enterprise Zone at Hillhouse, Thornton). The Council therefore wishes to be assured that the proposed scheme has been designed, not simply to deal with an existing identified problem, but also to enable future growth as proposed in the Local Plan and beyond.	<p>The Transport Assessment (document reference TR010035/APP/7.4) paragraphs 3.3.24-3.3.32 summarises how extra traffic from committed developments is included in the traffic modelling. Section 3.3.30 identifies that the Applicant consulted with Lancashire County Council, Blackpool Council, Fylde Borough Council and Wyre Council to obtain information regarding the planning status of future developments in the area. Local development data was obtained from Blackpool Council and Fylde Borough Council in November 2017. Wyre Council was unable to provide the planning status and quantum of future developments within the Wyre Council area and suggested that the Applicant prepare this information based on the published Draft Wyre Local Plan, September 2017, Wyre Council. Assumptions were therefore made by the Applicant regarding the level of certainty, timing, quantum, land-use and trip rates of the developments included in the Scheme Uncertainty Log in the Wyre Council Local Authority area.</p> <p>Sections 3.3.27 to 3.3.32 describe how information from local authorities was collected. Each individual development was then classified as per Table 3.4. Any development that was classed as near certain or more than likely; developments under construction or approved development proposals or developments with a planning application within the consent process; were included in the Core Scenario forecasts. All other developments were classed as reasonably foreseeable and included in the Optimistic Scenario. The Enterprise Zone at Hillhouse, Thornton was considered as reasonably foreseeable and included in the Optimistic Scenario based on the classification criteria described above.</p> <p>As stated in the Transport Assessment, the Scheme includes future provision for traffic growth in the area. The A585 mainline traffic flows are not forecast to reach capacity by the design year 2037 demonstrating that the Scheme mainline has reserve capacity to support future development in the area.</p>
31.4	<p>The Council also has significant concerns with regard to the issue of traffic movement within the Fylde Coast area, and in particular north/south movement between the coastal settlements.</p> <p>The Council wishes to be assured that the proposed scheme will not prejudice the</p>	During the meeting between the Applicant and Wyre Council, held 19 December 2018, the potential for a new road to link in to A586 Garstang Road East was discussed. It was confirmed that there is adequate space for a connection onto the A586 west of the proposed Poulton junction and this should not require any physical amendments to the proposed junction. If the

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
	ability of future highway schemes to be brought forward which may be necessary to improve such movements within the coastal area and which may also be necessary to enable future housing growth in Poulton le Fylde. In particular, the potential for a new road to link in to A586 Garstang Road East at or near the proposed new Poulton Junction.	connection was to be provided in the future, the additional junction between Poulton junction and the bridge over Main Dyke would probably have to be a signalised T junction and would have to be operationally linked to Poulton junction.
31.5	With regard to detailed matters the Council wishes to raise concerns in relation to the following technical issues and material considerations pending furthermore detailed consideration of the scheme details and associated Environmental Statement documents.	Refer to responses RR-31 (below 31.6, 31.7, 31.12 and 31.13).
31.6	Construction Phase Impacts to localised receptors: a) Noise & Vibration (impacts to existing receptors from all construction related activity / equipment) b) Dust & Air Quality (impacts to existing receptors from construction vehicle operation / movement, use of equipment, general construction activity, etc.) c) Light Pollution (impacts to existing receptors from artificial light, including that relating to night time construction activity and site security) d) Contaminated Land (impacts to construction workers and localised receptors resulting from the presence of contamination within the development site)	Noted. Wyre Council provided further detailed comments on a-d as part of the review of their draft Statement of Common Ground (SoCG) (document reference TR010035/APP/8.4). Responses to their comments are provided in Appendix A of the SoCG. All comments are currently under review with Wyre Council.
31.7	Operational Phase Impacts to localised receptors: a) Noise & Vibration (impacts to both proposed and existing receptors from road traffic / future maintenance works) b) Air Quality (impacts to both proposed and existing receptors from road traffic emissions) c) Light Pollution (impacts to both proposed and existing receptors from fixed artificial lighting columns) d) Contaminated Land (impacts to both proposed and existing receptors from contamination associated with the historical use of the development site and construction related activity)	Refer to response RR-31 (31.6).
31.8	Drainage comments: • Lancashire County Council are the Lead Flood Authority (LLFA) for both Fylde and Wyre Councils and will need to be consulted on drainage issues. • The Environment Agency have permissive powers for Main Dyke and Horsebridge Dyke watercourses and should be consulted on issues on issues concerning these. • Typically, an 8m access strip should be provided either side of the watercourses to provide access for maintenance. • The roadway appears to be elevated above existing ground levels; highway drainage details will need to be confirmed.	Lancashire County Council in their role as LLFA have been consulted regarding the proposed highway drainage design and proposals for works to ordinary watercourses. The LLFA has confirmed that, in principle, they have no concerns with the proposed works. As requested by the LLFA, draft Ordinary Watercourse Consents have been prepared for 7 structures based on the information currently available. One has been submitted for comment and was discussed at a meeting on 31 January 2019. To date no formal feedback has been received. The Applicant is aware of the Environment Agency's (EA) permissive powers for the main rivers affected by the Scheme being Main Dyke and Horsebridge Dyke watercourses as extensive consultation has been and continues to be undertaken with the EA. The design has allowed for 8m access strips either side of the non-tidal sections of Main Dyke and Horsebridge Dyke watercourses, as described in the Flood Risk Assessment (FRA) report (document reference TR010035/APP/5.2). The highway drainage design is outlined in the Drainage Design Development Report, appended to the FRA (document reference TR010035/APP/5.2) and the Outline Drainage Works Plans (document reference TR10035/APP/2.9). This would be further developed during the detailed design stage of the Scheme by the contractor and the LLFA and EA would be consulted as part of the required permit applications.

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
31.9	Within Fylde but adjacent Wyre boundary: Details of highway drainage will need to be confirmed, including details of attenuation and discharge rates to Main Dyke watercourse. Main Dyke is an enmainned watercourse forming the boundary between Fylde and Wyre – responsibility for it resides with riparian owners, although the Environment Agency have permissive powers to undertake works on it.	This information is provided in the Drainage Design Development Report, appended to the Flood Risk Assessment (FRA) (document reference TR010035/APP/5.2). The Applicant acknowledges the permissive powers of the Environment Agency with regard to works on the Main Dyke and, where required, Flood Risk Activity Permits would be prepared by the contractor.
31.10	Within Wyre: Details of highway drainage at junction of Breck Road/Mains Lane (Skipool Junction) will need to confirmed, including details of any attenuation and discharge rates to Horsebridge Dyke watercourse or Skippool Creek. Note that culverted section of Horsebridge Dyke watercourse runs under this junction.	This information is provided in the Drainage Design Development Report, appended to the Scheme's FRA (document reference TR010035/APP/5.2) and the Outline Drainage Works Plans (document reference TR10035/APP/2.9). The Scheme proposes works to replace the culverted section of the Horsebridge Dyke, subject to relevant permits and licences from the Environment Agency and/or Marine Management Organisation.
31.11	Drainage details from temporary construction compounds will need to be confirmed to ensure no contamination of Main Dyke watercourse by fuel oils or building materials.	Commitments to manage construction compound drainage to prevent pollution of watercourses, including the Main Dyke, are provided in the Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3) and the Draft Pollution Control Plan appended to the Outline Construction Environmental Management Plan (CEMP) (document reference TR010035/APP/7.2, Appendix G). As part of the discharge of Requirement 4 (outlined within the Development Consent Order) Wyre Council will have opportunity to confirm the commitments within the final CEMP and Record of Environmental Actions and Commitments prior to construction.
31.12	Cultural Heritage: Impact on any identified designated and non-designated Heritage assets and any mitigation proposed	Wyre Council provided further detailed comments on cultural heritage as part of the review of their draft Statement of Common Ground (SoCG) (document reference TR010035/APP/8.4). Responses to their comments and concerns are provided in Appendix A of the SoCG. All comments are currently under review with Wyre Council.
31.13	Landscape: Impact on the character and visual amenity of the landscape and any mitigation proposed.	Wyre Council provided further detailed comments on landscape as part of the review of their draft Statement of Common Ground (SoCG) (document reference TR010035/APP/8.4). Responses to their comments and concerns are provided in Appendix A of the SoCG. All comments are currently under review with Wyre Council.
AS-016	Trinity House	
AS-16.1	Please be advised that Trinity House has no objections to the proposed scheme. Any marking requirements will be considered once/if a marine licence is applied for.	Noted, no further response required.
AS-017	Eversheds Sutherland on behalf of Carrington Group Limited and Carrington Group Mains Lane Limited	
AS-17.1	We act for the Carrington Group and Carrington Group Mains Lane Limited ("Carrington") which is objecting to the application made by Highways England for a development consent order in relation to the A585 Windy Harbour to Skippool Improvement Scheme ("the Application"). The development consent order which has been applied for by Highways England includes plots within Carrington's ownership, as follows: • Plot 2/ 05 (permanent acquisition of land), owned by Carrington Group Limited; and • The following plots owned by Carrington Group Mains Lane Limited: Plot 4/ 02 (permanent acquisition of land); Plot 4/ 02a (permanent acquisition of land); Plot 4/02b (temporary acquisition of land); Plot 4/ 02c (temporary acquisition of land); Plot 4/02d (temporary acquisition of land); and Plot 4/ 02e (temporary acquisition of land and permanent acquisition of rights).	Noted, no further response required.
AS-17.2	Introduction Carrington's business involves investment in, and development of, sites across the country, specialising in brownfield opportunities, residential portfolios, strategic land and mixed use developments. It is particularly active in London, Kent and Lancashire,	Noted, no further response required.

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
	<p>often working with development partners, and has a number of interests in Poulton Le Fylde and the Fylde Coast.</p> <p>Carrington owns a development site at Mains Lane, Poulton Le Fylde, which is affected by the proposed route of the Scheme. Carrington's site comprises two parcels, marked as Parcel 1 and Parcel 2 on the attached plan (Appendix 1). The scheme, as proposed in the DCO documentation, will have a significant adverse impact on both Parcels 1 and 2.</p>	
AS-17.3	<p>Objection</p> <p>We are instructed to OBJECT to the DCO on behalf of Carrington for the reasons set out below.</p> <p>As is explained in this objection, there are some matters under discussion between Carrington and Highways England. It is possible that if these discussions bear fruit, it may be the case that the objection can be withdrawn, in whole or in part.</p>	Noted, no further response required.
AS-17.4	<p>We deal with Parcel 2 first:</p> <p>Parcel 2, Mains Lane - Proximity of Consented Development to New Road Planning permission was obtained by Carrington in November 2017 for 9 dwellings on Parcel 2 ("the Permission"). The permission was won on appeal, following a refusal by Fylde Borough Council ("the Council").</p> <p>In that appeal decision (ref APP/M2325/ W/ 17/ 3174 723, dated 6th November 2017) (Appendix 2) it was found that the Council could not demonstrate a 5 year housing land supply, as required by the NPPF; the "tilted balance" was engaged and permission was granted. It should be noted that, in granting permission, the inspector recognised that the site was in an accessible location and would deliver economic benefits to the area including the provisions of jobs and increased spending in local shops and businesses. The contribution the site could make towards the Borough's supply of housing was also highlighted.</p> <p>Importantly, there was no reference in the decision to the Scheme, and it should be noted that Highways England accepted the principle of the development subject to the imposition of appropriate conditions.</p> <p>In reliance on that decision, and Highways England's stance in relation to it, Carrington is now ready to progress the development. Reserved matters were submitted on 13 September 2018, and approved on 15 November 2018 and a start on site was initially programmed for January 2019. This has been delayed as a result of stalled discussions with Highways England, as set out below in relation to the drainage strategy.</p> <p>However, the Scheme will require the acquisition of a part of the Parcel 2 site Plot 4/ 02, and temporary acquisition of Plot 4/ 02d, and the route of the proposed carriageway will be un-necessarily close to the remainder of the consented scheme. In addition to the land-take, the close proximity of the proposed carriageway will undoubtedly have a significant adverse impact on the amenity of the future residents of the proposed dwellings. Further, it is highly likely that the noise caused by the construction and subsequent use of the new road will reduce the value of the development and have a substantial adverse impact on Carrington's funding arrangements for the site. The acquisition of part of the site will also inhibit Carrington's ability to further develop Parcel 2, as was previously intended prior to the announcement of the current proposed carriageway route.</p> <p>To date, Highways England has still not provided sufficient justification as to why the proposed line of the carriageway of the Scheme must be in this location generally, let alone so close to the consented development. Carrington objects to the route of the</p>	Refer to response in RR-008 (8.1 and 8.3).

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
	Scheme and seeks its realignment further away from Parcel 2 so as to leave a reasonable distance between the road and the permitted houses.	
AS-17.5	<p>Parcel 2, Mains Lane - Drainage Strategy</p> <p>Condition 11 of the Permission requires the submission of a drainage strategy to, and approval of the same by, the Council. Carrington submitted the strategy as appended to this letter at Appendix 3 ("the First Drainage Strategy") on 13 September 2018. Following the Council's consultation with Highways England, the Council refused to approve the First Drainage Strategy on the basis of Highways England's objection that the proposed drainage culvert ran across the land which was purportedly safeguarded for the Scheme, despite the fact that no such safeguarding order was in place.</p> <p>Jerome Roith, Director of Carrington, made repeated attempts to discuss the matter with Highways England. It was felt that the works comprised in the First Drainage Strategy would not adversely affect the delivery of the Scheme, and could have been accommodated with reasonable flexibility. However, Highways England did not withdraw their objection to the First Drainage Strategy.</p> <p>On 11 January 2019, Mr Roith and his drainage consultant, Andrew Calvert, attended a meeting with representatives from Highways England and their drainage consultants, Arcadis, and discussed an amended drainage strategy ("the Proposed Alternative Drainage Strategy") (see Appendix 4), which we understand provides a new route for the drainage to the south of the site which is in accordance with the Highways England proposed scheme and their preferred drainage route.</p> <p>It is our understanding that the Proposed Alternative Drainage Strategy, which was in fact suggested by the A585 Highways England Project Team and Arcadis Road Designer Nick Henderson, was well received by all attending the meeting and therefore forms the basis of an acceptable way forward. Mr Roith was informed following the meeting that formal sign-off was required from Warren Hilton of Highways England, and that the matter would now progress swiftly. Unfortunately, this has not been the case, and at the time of writing, Carrington is still awaiting confirmation that the Proposed Alternative Drainage Strategy has been agreed. It is hoped that the Proposed Alternative Drainage Strategy will be agreed by Highways England, and this notified to the Council, as soon as possible. If so, and the drainage strategy is approved by the Council and arrangements put in place to enable those works to be carried out, Carrington will be in a position to withdraw this element of its objection to the DCO.</p> <p>Should Highways England fail to agree the drainage arrangements, Carrington may not be able to build out its permitted development and make a significant compensation claim to Highways England (see below regarding compensation). At present, Carrington is incurring significant funding costs as a result of the delay in being able to lawfully commence development.</p> <p>Carrington requests that Highways England approves the drainage strategy urgently and until that time Carrington must maintain its objection to the DCO for the reason that the Scheme is currently preventing the delivery of the approved housing scheme on Parcel 2.</p>	Refer to response in RR-008 (8.2).
AS-17.6	<p>Parcel 1, Mains Lane</p> <p>Parcel 1 is identified in the attached plan. It is the larger of the two parcels of land, and is currently used for agricultural purposes, let on agricultural tenancies.</p> <p>Parcel 1 is the larger of the sites, and comprises a future phase of development which could accommodate over 150 houses. Whilst Parcel 1 is not allocated for residential</p>	Refer to response in RR-008 (8.3).

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
	<p>development in the current or emerging development plans for Fylde, it has a prospect of residential development being granted in future. This site could provide an important contribution to Fylde meeting its housing targets.</p> <p>As is explained above, Parcel 2 already has the benefit of planning permission for 9 dwellings, and in the inspector's decision a number of significant conclusions are stated regarding the acceptability of residential development off Mains Road. These considerations would also apply to residential development on Parcel 1.</p> <p>The updated NPPF increased the onus and burden on planning authorities to ensure the supply of 5 years' housing land (particularly with the housing delivery test and the change to the definition of "deliverable" requiring authorities to demonstrate through evidence that sites in their plans actually are deliverable), and with Fylde's recent track record in not being able to demonstrate a 5 year supply, it is foreseeable that Parcel 1 will need to come forward for residential development.</p> <p>The Scheme will have the effect of sterilising Parcel 1 by removing the existing agricultural access (and thereby removing the existing agricultural use of the land), and in removing the possibility of a future access for the site to connect into the Scheme. In effect, the Scheme, land-locks Parcel 1 and sterilises it for its current use and for any future uses.</p> <p>Carrington's expert and highly experienced highways consultants, Optima, have reviewed the plans and have confirmed that the Scheme can be amended so as to cater for an access to Parcel 1 - which would be acceptable for both the existing agricultural use of the land, and for a future residential development on the land of the size contemplated by Carrington. A copy of Optima's technical report is found at Appendix 5 to this letter. It will be seen that the development of Parcel 1 could come forward whether or not the Scheme comes forward - with relatively small amendments to the current proposals for the Scheme.</p> <p>Whilst there have been discussions between Carrington and Highways England, in which the latter have been reluctant to engage in constructive dialogue, no progress has been made. Unless and until the Scheme is amended to maintain the existing access, and to provide an improved access for the future development of the site (which can be achieved on a reasonable basis), Carrington maintains its objection to the DCO on the basis of the sterilisation of the site.</p>	
AS-17.7	<p>Compensation</p> <p>Whereas the amount of compensation payable is usually a matter for the Upper Tribunal (Lands Chamber), and not for consideration at this stage, here the matter of compensation is relevant. This is because there is a prospect that Highways England has underestimated the amount of compensation payable and therefore may have insufficient funds in its budget to acquire the required land and build the road.</p> <p>With the current design of the Scheme likely to:</p> <ul style="list-style-type: none"> (a) have a significant adverse impact on the consented residential development on Parcel 2, both in terms of amenity value for future residents, and development value for Carrington; (b) prohibit development of at least one additional unit which Carrington intended to seek permission for on Parcel 2; (c) land lock and thereby sterilise the existing agricultural uses of, and the potential development of, Parcel 1; and (d) significantly increase the cost of implementing a surface drainage strategy that is acceptable to Highways England and the Council, <p>Highways England could face a substantial compensation claim from Carrington in</p>	<p>The Applicant has carried out a thorough assessment of the compensation likely to be payable for the interests subject to compulsory acquisition. It is content that it has sufficient funds to pay the compensation and deliver the Scheme. Any matter of compensation is for agreement or in due course determination by the Upper Tribunal (Lands Chamber).</p>

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
	<p>the event the development consent order is granted. This is particularly the case given the potential quantum of the compensation Carrington may claim. But for the Scheme, Carrington would have advanced a planning application for the residential development of Parcel 1 before now and, given the Council's position regarding its 5 year housing land supply, it would have had very good prospects of success - especially, as Optima have demonstrated, where the scheme would be acceptable and could connect to a new Scheme in any event. Carrington objects on the basis that Highways England has not demonstrated that It has sufficient funds to meet the compensation liabilities that will arise, and therefore it has not demonstrated that it has the funds and resources to deliver the Scheme.</p>	
AS-17.8	<p>Interference with Rights In exercising its powers Highways England must act in accordance with the Human Rights Act 1998, and must act proportionately. This means that when deciding the route and specific alignment for the Scheme, It must consider the impacts on those affected, and should only interfere substantially and seriously with such rights where It is justified and proportionate to do so. The acquisition of part of Carrington's land is an interference with Carrington's rights. Here, the Scheme will sterilise one substantial parcel of land owned by Carrington and will significantly and adversely impact on a consented residential development being advanced by Carrington. The adverse impacts, and interference with Carrington's rights (including rights protected by the Human Rights Act), have not been justified and have not been demonstrated to be proportionate. On the other hand, it has been demonstrated that with relatively minor and reasonable adjustments to the route, the harm to Carrington can be reduced or even avoided. It is proportionate (and therefore incumbent on) Highways England to continue to engage with Carrington to investigate the potential for a mutually acceptable solution. Carrington therefore objects to the DCO on the basis of the unlawful interference with Carrington's rights</p>	<p>Refer to response in RR-008 (8.5). The Applicant does not agree that the Scheme will sterilise the land owned by Carrington. Nor has it been demonstrated that any adjustments proposed by Carrington are minor, necessary or reasonable. The Applicant has engaged with Carrington about the impact of the Scheme and the acquisition of their land and will continue to do so.</p>
AS-17.9	<p>Summary Carrington remains ready and willing to engage further following this objection and hopes that it can work with Highways England to address the above issues. Carrington is confident that with reasonable amendments it will be possible to avoid Carrington's land {Parcel 1} being sterilised, and amendments can be made to the proposed alignment of the carriageway so as to avoid the worst of the impacts on Carrington's consented dwellings on Parcel 2. Further, Carrington anticipate hearing from Highways England shortly to confirm that the Proposed Alternative Drainage Strategy Carrington looks forward to hearing from Highways England as a matter of urgency, given, in particular, the delays which have already been caused to Carrington's development of Parcel 2. In the meantime, Carrington maintains its objection to the DCO.</p>	<p>The Applicant has engaged with Carrington about the impact of the Scheme and the acquisition of their land and will continue to do so.</p>
AS-018	Ministry of Defence	
AS-018.1	<p>Thank you for consulting the Ministry of Defence (MOD) on 22 January 2019. On reviewing the application plans, I can confirm that the MOD has no safeguarding objection to this proposal. I trust this is clear however should you have any questions please do not hesitate to contact me.</p>	<p>Noted, no further response required</p>
AS-022	Matt Hodges (Cycling UK)	

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
AS-022.1	During the consultation I raised issues and objections to some detailed aspects of this scheme while not objecting to the constructing of the bypass as a whole. I got an automatic acknowledgement of my email but nothing since.	Noted, no further response required
AS-022.2	I did not receive any notice that this scheme had been submitted to the Planning Inspectorate or details of how I could raise issues with you regarding the design as submitted. I have only recently become aware that this scheme is with you and have looked at the scheme on your website. I would like to raise objections to the scheme as submitted. Even though this may be rather late I think it is only right that I, as an initial objector, should be able to submit further details as I am only late because Highways England did not notify me that they had submitted the planning application.	
AS-022.3	For information I am attaching a copy of the comments I submitted to Highways England on 24/9/2018 which drew attention to several areas in which the scheme did not comply with the requirements of Interim Advice Note 195/16 Cycle Traffic and the Strategic Road Network or the Highways England Cycling Strategy.	
AS-022.4	<p>Objections to the Application as submitted.</p> <p>Interim Advice Note 195/16 Cycle Traffic and the Strategic Road Network (IAN 195/16) states at 1.1:</p> <p>“Purpose and required actions</p> <p>The purpose of this document is to ensure SRN infrastructure facilitates the convenient and safe movement of cycle traffic crossing or travelling along the SRN, where cycling is legally permitted.</p> <p>This IAN document sets out how SRN infrastructure will support Highways England’s objectives for cycle traffic.”</p> <p>And at 1.3 :-</p> <p>Implementation</p> <p>This document shall be implemented forthwith, except where:</p> <p>a. The procurement of works, at any stage from conception through design to completion of construction, has reached a stage at which, in the opinion of Highways England, use of this document would result in significant additional expense or delay progress (in which case the decision must be recorded in accordance with Highways England’s procedures).</p> <p>Since this scheme was still subject to consultation in 2018 it should comply fully with IAN 195/16 which was issued in October 2016.</p> <p>It should also comply with the more general provisions of the Highways England Cycling Strategy which includes "Ensure that wider network investments incorporate cycling facilities. For example, when we invest in road network improvements, the needs of cyclists will be considered, both during construction and as part of any completed scheme."</p> <p>It should also comply with Government policies to increase cycling and walking and also the use of public transport.</p> <p>In so far as it does not comply fully with these requirements you should be applying conditions or requiring changes to ensure it is compliant when constructed.</p>	As part of the Highways England cycling strategy, it published IAN 195/16 “Cycle Traffic and the Strategic Road Network” along with HD 42/17 “Walking, Cycling & Horse-Riding Assessment and Review”. These partially superseded TA 90/05 “The Geometric Design of Pedestrian, Cycle and Equestrian Routes” and TA 91/05 “Provision for Non-Motorised Users”. These design standards and advice notes have been used in the development of the cycling proposals for the Scheme.
AS-022.5	<p>IAN 195/16 lists “five design criteria”:</p> <ul style="list-style-type: none"> • Coherence: Cycle networks shall link trip origins and destinations, including public transport access points and shall be continuous and easy to navigate. • Directness: Cycle networks shall serve all the main destinations and shall seek to offer an advantage in terms of distance and journey time. • Comfort: Infrastructure shall meet design standards for alignment and surface 	Highways England’s document IAN 195/16 “Cycle Traffic and the Strategic Road Network” Section 2.1.1 – “Designing networks for cycle traffic” states: “Where all-purpose trunk roads are upgraded with new routes being provided, the original route corridor and adjoining local road network can provide a suitable opportunity for compensatory cycle route provision. In such instances, designers shall liaise with the appropriate local highway authority responsible for the original route once reclassified.”

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
	<p>quality, and cater for all types of user, including children and disabled people.</p> <ul style="list-style-type: none"> • Attractiveness: Aesthetics, noise reduction and integration with surrounding areas are important. • Safety: Cycle networks shall not only improve cyclists' and other road users' safety, but also their feeling of how safe the environment is. <p>While IAN 195/16 does say "Where all-purpose trunk roads are upgraded with new routes being provided, the original route corridor and adjoining local road network can provide a suitable opportunity for compensatory cycle route provision", this is only appropriate where the original route corridor complies with and will continue to comply with the five design criteria. While TA 91/05 says</p> <p>3.20 Footways should normally be provided within the highway boundary or in another location in the form of an OCR. In urban situations, footways should normally be provided on both sides of the carriageway, while in rural situations footways should normally be provided on at least one side of the carriageway, to connect to most key destinations. Specific areas in which this scheme as proposed does not comply with IAN 195/16 and the still current parts of TA91/05:-</p>	<p>The proposed use parts of the existing road network (A585) to be bypassed and/or de-trunked are considered to adhere with the five design criteria.</p> <p>However, it is accepted that the alternative route from Skippool to Poulton industrial estate off Garstang Road East would be less direct than a route following the bypass.</p>
AS-022.6	<p>In failing to Provide a cycle track and footway or a shared path along the side of the new bypass carriageway. -</p> <p>The proposal is to send cyclist and pedestrians up the otherwise closed off old road. This old road will also be used for agricultural access. While at first sight this may appear suitable it fails to meet the IAN 195/16 design criteria.</p> <p>Coherence: For cyclists not familiar with the area tracks that wander away from the signed motor road to their destination are not easy to use and so are generally ignored. They tend to be badly maintained and damaged signs are not replaced resulting in getting lost. In strange areas cyclists will follow signed motor roads.</p> <p>Comfort: While this may initially be OK it will soon deteriorate and will soon be unsuitable for many types of users. Used for agricultural access the surface will very soon be covered in layers of mud from tractor wheels. Hedges and trees will grow out over the path and if the hedges are trimmed the hedge flailings will not be removed and will be a hazard. Rotting leaves will form leaf-mould and slime on the surface. Any cracks or other faults will not be repaired. Several old rural roads that are no longer through routes for motor vehicles but used by cyclists have been neglected so they are now very difficult for both cyclists and pedestrians. The combination of agricultural debris and poor surface maintenance means this will not be suitable for cyclists commuting in clothes suitable for any type of office or retail job. For the same reasons it will not be suitable for many pedestrians.</p> <p>Safety: While this old road will be safe from traffic it does not meet the Safety Criteria. It will be very isolated and for many ladies, both cyclists and pedestrians, it will not feel safe. Also many parents will not want their children to use such an isolated lonely route.</p> <p>TA 91/05 also draws attention to the need for personal security.</p> <p>8.31 Designers need to take account of personal security issues when designing an NMU route. OCRs within or adjacent to the highway verge will bring about a degree of perceived and actual personal safety if a sufficient visual and physical connection with the carriageway can be maintained.</p>	<p>There would be no prohibition for cyclists but there would be encouragement for them to use the cycle route, refer to the General Arrangement plans (document reference TR010035/APP/2.5). Local Transport Note LTN 2/08 indicates it is likely that "fast commuter" or "sports cyclists" would use the bypass as they are "confident in most onroad situations and will use a route with significant traffic volumes if it is more direct than a quieter route".</p> <p>The design considerations for cyclists was that no specific provision would be made along the bypass due to: (1) High traffic speeds on the bypass, (2) Non-provision of lighting along most of the route (3) Alternative routes using the sections of roads to be bypassed form a more direct and quieter route between the local communities.</p> <p>The alternative routes proposed use parts of the existing road network to be bypassed and/or de-trunked and are considered to adhere to the five design criteria described in IAN 195/16.</p>

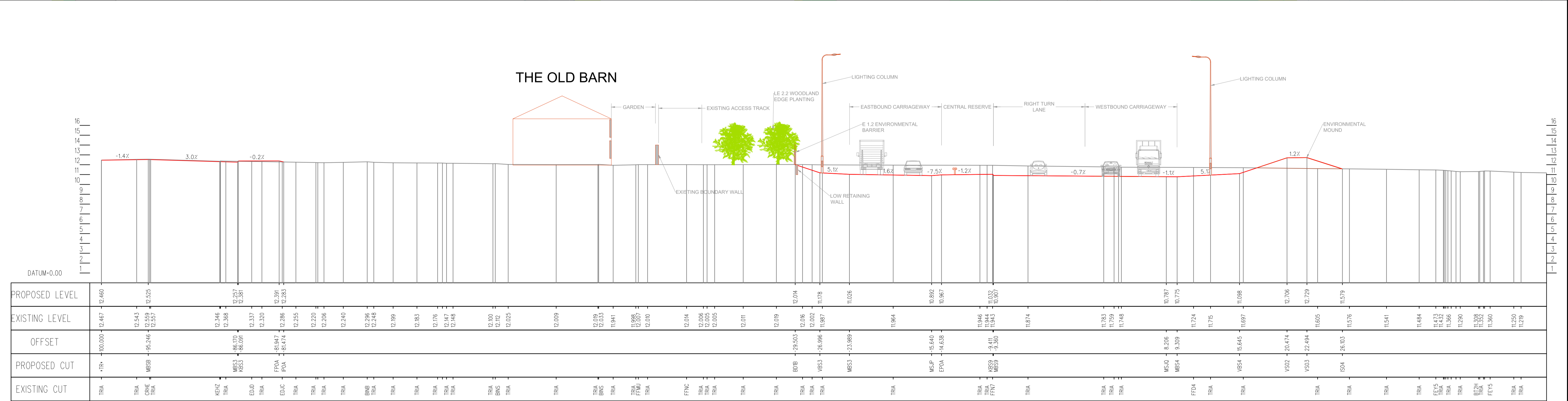
Reference Number	Comment from Relevant Representation	Response to Relevant Representation
AS-022.7	<p>Also the A585T from Skippool to Fleetwood was constructed without cycle or pedestrian paths along most of its length. this has proved to be a mistake and plans have now been prepared for the construction of a shared path on the east side all the way from Skippool to Fleetwood. Some sections have been constructed but others are still awaiting funding. This being so it is utterly absurd to construct this new section without a path on the east side. To add one later will be far more expensive and disruptive than constructing one as part of the initial construction.</p>	<p>It is intended that the cycle routes will connect with the proposed route along the north-east side of Amounderness Way from the crossing points at the Skippool Junction. There is sufficient space in the verge alongside the eastbound carriageway for a two-way 2.5m wide cycleway but that would have to negotiate the laybys and pass in front of the Lodge Lane north retaining wall. It would also require alterations to the layout of Poulton Junction and Skippool Bridge Junction to provide suitable crossing arrangements. Normally, such a cycle route would not be protected by safety fence and westbound cyclists would be travelling in to opposite direction to eastbound traffic. In low light conditions there could be the risk of cyclists being dazzled by oncoming traffic.</p>
AS-022.7	<p>In allowing this planning application please apply a condition that there must be a shared path along the whole of the east side of this bypass.</p>	<p>The design considerations for cyclists was that no specific provision would be made along the bypass due to: (1) High traffic speeds on the bypass, (2) Non-provision of lighting along most of the route (3) Alternative routes using the sections of roads to be bypassed form a more direct and quieter route between the local communities. The alternative routes proposed use parts of the existing road network to be bypassed and/or de-trunked. They are considered to adhere with the five design criteria described in IAN 195/16.</p>
AS-022.8	<p>The cycle and pedestrian route from Mains Lane to the Breck Road Service Road:- This also fails to meet the IAN 195/16 criteria for both Coherence and Directness. Please require Highways England to study this again and to adopt the suggested alternative unless they can show it is not workable. Here are the problems I have identified:- The pedestrian/cycle crossing of this junction is also confusing and multi-phase. The shared path on Mains Lane is on the north east side. For cyclists or pedestrians to cross to the Old Breck Service Road the following stages are required. Cross to the SW side of Mains Lane with no Assistance. Mains Lane has been widened to 3 lanes and is subject to fast traffic at all times. Wait for the traffic lights to cross the left turn slip for traffic from Mains Lane onto the A585 eastbound. Wait for the traffic lights to cross the two right turn lanes for traffic from Mains Lane onto the A585 westbound. Wait for the traffic lights to cross the right turn lane for traffic from the A585 westbound into Mains Lane. Wait for the traffic lights to cross the two eastbound lanes of the A585. Wait for the traffic lights to cross the two westbound lanes of the A585. This latter stage 6 requires an extra disruption to westbound traffic on the A585. Without this Cycle /Pedestrian crossing west bound traffic on the A585 would only be stopped when Westbound traffic from Mains lane was being allowed into this section. This crossing is therefore an extra disruption to A585 westbound traffic. It should be remembered that this crossing is two way so any phasing that may mean one crossing rapidly follows another won't work for people crossing the other way. This will be a very slow crossing with long waits. There is a better solution that was suggested in my consultation response. This would require only three stages for cyclists and pedestrians to cross this junction and would not require any extra disruption to traffic flow on the A585. 1 Cross to the SW side of Mains Lane just near the junction with Old Mains Lane. This should be a Toucan as this will still be a fast and busy road. 2 Cross the eastbound carriageway of the A585 just east of the entry for traffic from Mains Lane. This crossing should coincide with the phase allowing traffic from the west bound A585 to turn right into Mains Lane so both the eastbound A585 will be stopped and the flow out of Mains Lane will be stopped. It would require the Left turn</p>	<p>It is accepted that this suggestion could provide a simpler connection for users moving between Mains Lane southern footway and the southern footway towards Skippool Junction. However, it would not normally be appropriate for the crossing of both carriageways of the bypass east of the junction to be achieved in a single movement.</p> <p>This suggestion would further rely on the southern footway being available for cycle use and that would result in the route crossing five entrances including the Skippool service station. From the baseline NMU surveys carried out in December 2017 and July 2018 (document reference TR010035/APP/6.10.1) there is a known demand to and from Old Mains Lane that is better served by a crossing on the west side of the junction.</p>

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
	<p>flow out of Mains Lane to only flow when the right turn traffic is also allowed to flow. That should not be a problem as the volume is less.</p> <p>Cross all three lanes of the A585 westbound in a single stage. This should coincide with traffic from Mains Lane being allowed to flow onto the A585 both east and west bound as this will require the westbound A585 to be stopped. This may require the stop lines on the A585 westbound to be moved back a little but it will avoid an extra disruption to westbound traffic on the A585. It will require a short extension of shared path on the SW side of the A585 from this new crossing point together with a safe crossing of the entrance to YENSE field but it will avoid the messy paths across the junction islands. It is also compatible with a continuous Shared path on the NE side of the A585 all the way from Windy Harbour.</p>	
AS-022.9	<p>As part of this better scheme for the Skippool Bridge junction it would also be better for the shared path on Mains Lane to cross the realigned Old Mains Lane at the junction and continue beside the A585 between the A585 and Old Mains Lane.</p>	<p>In the previous document Mr Hodges had suggested that the shared crossing of Old Mains Lane link road should follow the slip road and should be a priority crossing of the Old Mains Lane link road at a raised table. The current design takes NMUs along a route away from high traffic flows and is partly shared with routes for users in Old Mains Lane. This was considered to be preferable to NMUs continuing alongside high traffic flows as suggested.</p>
AS-022.10	<p>This rough sketch that was part of my consultation response shows the general layout on the background of the earlier consultation scheme. It is rough as since retiring I don't have a proper drawing package but it shows the basic requirements for the better crossing that is compatible with IAN 195/16.</p> <p>Skippool Junction</p> <p>I am very concerned by the poor and convoluted routes for pedestrians and cyclists at and near to this junction. This fails to meet the criteria for Coherence, Directness and Comfort. It is far from continuous with no less than EIGHT separate traffic light controlled stages to get from Breck Road to the eastbound shared path. Even though both the eastbound and westbound flows on the A585 west side of the junction will both be stopped when the Straight across flow from Breck Road to Skippool Road are running the offset in the cycle/pedestrian crossing will mean that there will be congestion in the centre refuge and many cyclists and pedestrians will be trapped in the centre and have to wait for the next straight across flow from Breck Road. All the while if it is raining they will be sprayed with dirty water by the East West flows on the A585 carriageway. This is hardly conducive to the comfort criteria. A similar situation will occur in the crossing of Skippool Road.</p> <p>You need to ask Highways England for a detailed phasing of the traffic Lights and a maximum time it will take a pedestrian to cross from the West Side of Breck Road to the shared path on the diagonally opposite corner to head east beside the A585 if obeying the green and red man signals. My experience at a similar multi stage crossing with only six stages leads me to believe it will be a minimum of SIX minutes. This is not acceptable when the cars which cause the problem are being rushed through in seconds.</p> <p>The lights need to be set up so Pedestrians and Off Carriageway Cyclists can press a button and get a clear single stage crossing of the A585 after a wait of no more than one minute then press another button and get a clear single stage crossing of Skippool Road after another wait of no more than one minute.</p>	<p>The overall cycle time at the signals would vary depending on the traffic flows at different times of the day but have been tested with a limit of 135 seconds.</p> <p>For example, a pedestrian crossing northwards from the west side of Breck Road to the west side of Skippool Road would:</p> <ul style="list-style-type: none"> • Cross the Breck Road to Amounderness Way left turn lane during Phase 1 waiting on the triangular island • Cross the 2-lane westbound exit leading to Amounderness Way during Phase 2 waiting on the central reserve • Cross the 2-lane eastbound ahead and right turn approaches from Amounderness Way during Phase 3 or Phase 4 without waiting on the splitter island but waiting on the triangular island adjacent to the left turn lane from Amounderness Way to Skippool Road • Crossing the Amounderness Way to Skippool Road left turn lane during Phase 3 (if time permits) or waiting on that triangular island until the subsequent Phase 2 to complete the crossing. <p>The overall crossing time for the above movement is likely to be between 90 seconds (1 ½ minutes) and 150 seconds (2½ minutes).</p>
AS-022.11	<p>Dangerous side roads between Skippool Junction and Skippool Bridge.</p> <p>Between Skippool Junction and Skippool Bridge there are two minor junctions and the possibility of a third on earlier drawings that show a development marked Key Worker Housing. These junctions fail to meet the criteria in that they are dangerous. They are</p>	<p>The impact of the accesses has been assessed and where further works are required these have been incorporated into the Scheme.</p> <p>The western entrance provides an access to the field on Skippool Marsh and is, currently only</p>

Reference Number	Comment from Relevant Representation	Response to Relevant Representation
	<p>swept entries allowing vehicles to turn in at speed. Cyclists on the shared path are expected to give way. At busy times this involves looking back 180 degrees and deciding if any of the half dozen cars approaching at speed is going to swing into the entry without signalling as some will. This is not possible to do with certainty. The first junction at present leads to a field. It would appear this is in preparation for some planned development.</p> <p>There is also a problem with the second junction for cyclists the other way heading westward. Their view of any vehicles approaching on this side road is very poor so they will not be aware of any such vehicles. The drivers of a vehicle approaching to exit onto the A585 will have a good view of vehicles approaching on the A585 carriageway and will be looking that way to his right, and if there is a gap will drive straight out without looking to the left so will not see any cyclists approaching on the shared path. These are accidents waiting to happen. These junctions need to be made safe. The best way would be to close the junctions to the A585 and connect them to either Old Mains Lane or Wyre Lane as a condition of any further development. Minor developments should not have direct access onto the strategic road network. If these cannot be diverted onto a service road they should be combined into one junction without a high speed swept entry and with a priority crossing for the Shared path.</p>	<p>used occasionally by a horse club. The eastern entrance provides shared access to the Poulton pumping station and the office development (Keyworker Homes). Adequate inter-visibility between cyclists and vehicles using the accesses and warning signs will be provided.</p>
AS-022.12	<p>Further considerations.</p> <p>There are a number of other issues to consider that impact on the use of the cycle ways on this stretch of the A585.</p> <ol style="list-style-type: none"> 1. The future development of the shared path between Skippool and Fleetwood: This is likely to significantly increase the number of cyclists using these facilities for commuting. 2. There is a major housing development on the A586 east of Windy Harbour at Great Eccleston. This is likely to increase the number of cyclists wanting to commute along this line to Poulton, Blackpool or Fleetwood. 3. Government policies to encourage Cycling and Walking will also increase the use of these facilities. <p>It is therefore vital that these cycling facilities should be well designed and comply with the design criteria in IAN 195/16.</p>	<ol style="list-style-type: none"> 1 The layout at the north western corner of Skippool Junction has been reviewed and it has been established that there would be sufficient space on the north-west corner of the proposed Skippool Junction for a 2.5m wide cycleway to be constructed without affecting the neighbouring property's fence. 2 There is little provision for pedestrians and cyclists along Lancashire County Council's A586 Garstang Road between Windy Harbour Junction and Great Eccleston. This is outside the scope of this Scheme. 3 Refer to response in AS-022 (AS-022.4).
AS-022.13	<p>Conclusion</p> <p>As currently proposed this project does not comply with the requirements of Interim Advice Note 195/16 Cycle Traffic and the Strategic Road Network or the Highways England Cycling Strategy. It should either be sent back for redesign or conditions should be applied as suggested above to make it comply.</p> <p>Here is a copy of the consultation response I sent to Highways England on 24/9/2018.</p>	<p>Refer to response in AS-022 (AS-022.4).</p>

Page left intentionally blank

Appendix A – Cross Section



CH = 780.00

Rev	Status	Date	Description	Drawn	Chkd	Apprv
P2	S3	23/04/19	Section location updated	TC	PT	NH
P1	S3	16/04/19	First issue	TC	PT	NH

NOTES

- References LE2.2 and E1.2 related to Sheet 3 of the Environmental Masterplan (Document Reference TR010035/APP/6.19)

This map is based upon Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. HIGHWAYS ENGLAND 100030649 2017

Client

Registered office:
ARCADIS | Infrastructure
Arcadis House
34 York Way
London
N1 9AB

Coordinating office:
The Surrey Research Park
10 Medawar Road
Guildford GU2 7AR
Tel: 44 (0)1483 803 000

Project: A585 WINDY HARBOUR TO SKIPPOOL IMPROVEMENT SCHEME

Drawing title: **CROSS SECTION 195 MAINS LANE**

Status	Scale	Drawn By	Checked By	Approved By	Revision	Date	Original Size
S3 - PRELIMINARY DESIGN	1:200@A1	T.CHAUDHRY	P.THOMAS	N.HENDERSON	P2	16.APRIL.2019	A1
Drawing number HE PA Originator Volume Location Type Revision Number HE548643-ARC-HGN-S3_ML_001-DR-D-4053							