

# **A585 Windy Harbour to Skippool Improvement Scheme**

**TR010035**

## **8.4 Draft Statement of Common Ground with Wyre Council**

APFP Regulation 5(2)(q)

Planning Act 2008

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

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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 201[ ]

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**STATEMENT OF COMMON GROUND WITH WYRE  
COUNCIL**

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<b>Regulation Number:</b>	Regulation 5(2)(q)
<b>Planning Inspectorate Scheme Reference</b>	TR010035
<b>Application Document Reference</b>	TR010035/APP/8.4
<b>Author:</b>	A585 Windy Harbour to Skippool Improvement Scheme Project Team, Highways England

<b>Version</b>	<b>Date</b>	<b>Status of Version</b>
Rev 0	May 2019	Deadline 2 Submission

## **STATEMENT OF COMMON GROUND**

**This Statement of Common Ground has been prepared and agreed by (1) Highways England Company Limited and (2) Wyre Council**

**Signed.....**  
**Name (1)**  
**Project Manager**  
**On behalf of Highways England**  
**Date:**

**Signed.....**  
**Name (2)**  
**Position (2)**  
**On behalf of Wyre Council**  
**Date:**

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## **1 INTRODUCTION**

### **1.1 Purpose of this document**

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared in respect of the proposed A585 Windy Harbour to Skippool Improvement Scheme (the Application) made by Highways England to the Secretary of State for Transport (Secretary of State) for a Development Consent Order (DCO) under Section 37 of the Planning Act 2008.
- 1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available in the deposit locations and/or the Planning Inspectorate's website.
- 1.1.3 The SoCG has been produced to confirm to the Examining Authority where agreement has been reached between the parties to it, and where agreement has not (yet) been reached. SoCGs are an established means in the planning process of allowing all parties to identify and so focus on specific issues that may need to be addressed during the examination.

### **1.2 Parties to this Statement of Common Ground**

- 1.2.1 This SoCG has been prepared by (1) Highways England as the Applicant and (2) Wyre Council.
- 1.2.2 Highways England became the Government-owned Strategic Highways Company on 1 April 2015. It is the highway authority in England for the strategic road network and has the necessary powers and duties to operate, manage, maintain and enhance the network. Regulatory powers remain with the Secretary of State. The legislation establishing Highways England made provision for all legal rights and obligations of the Highways Agency, including in respect of the Application, to be conferred upon or assumed by Highways England.
- 1.2.3 Wyre Borough Council is one of the three local authorities that the Scheme lies within. The council is responsible for housing, leisure and recreation, environmental health, planning applications and local taxation collections. The topics of principal concern to the council in relation to the Scheme are Traffic; Noise and Vibration; Air Quality; Cultural Heritage; Biodiversity; Landscape; Geology and Contaminated Land; and Flood Risk.

### **1.3 Terminology**

- 1.3.1 In the tables in Section 3 of this SoCG, 'Not Agreed' indicates a final position, and "Under discussion" where these points will be the subject of on-going discussion wherever possible to resolve, or refine, the extent of disagreement between the parties. "Agreed" indicates where the issue has been resolved.
- 1.3.2 It can be taken that any matters not specifically referred to in Section 3 of this SoCG are not of material interest or relevance to Wyre Council, and therefore have not been the subject of any discussions between the parties. As such, those matters can be read as agreed, only to the extent that they are either not of material interest or relevance to Wyre Council.

## 2 RECORD OF ENGAGEMENT

2.1.1 A summary of the meetings and correspondence that has taken place between Highways England and Wyre Council in relation to the Application is outlined in Table 2-1.

Table 2-1: Record of Engagement

Date	Form of correspondence	Key topics discussed and key outcomes
September 2015	Meeting	Local Authority Options Workshop – Options presented and commented on
May 2016	Meeting	Project Introduction and options
September 2017	E-mail	<p>Discussion with Planning Officer regarding selection of Representative Viewpoints as part of the landscape assessment of the Scheme.</p> <p>Response – “The one suggestion I have is a view point north of Skippool roundabout along Wyre Way which is promoted as a recreational route around Wyre Estuary. On your plan you show a footpath along the estuary and through the green belt. An appropriate view point might be the southernmost point before the footpath turns west”. Viewpoint added as requested.</p>
November 2017	E-mail	<p>Discussion with Planning Office regarding the update of the Uncertainty Log to confirm the proposed developments in the Local Plan and supplementary documents to ensure all likely developments to go ahead in Wyre Council are captured.</p> <p>Response – “I am sorry that we are unable to help you further with the uncertainty log at a time that fits within your timeframe - it is obviously a crucial time for both organisations. I think with the time constraints the easiest thing would be for Arcadis to update the log on behalf of HE and review the draft Local Plan to update the forecasts.”</p>
December 2017	E-mail	<p>Discussion with Planning Officer regarding selection of locations for photomontages and night time photo views.</p> <p>Response – “I apologise that I have not responded. We are preparing for submission later in December, so I am not able to have a look” No further update received.</p>
December 2017	E-mail	Contact was made with the Waste Enforcement and Environmental Protection Officer at Wyre Borough Council, in order to agree baseline monitoring locations.
April 2018	E-mail	Request submitted for records of unlicensed (private) water supply abstractions from surface or groundwater sources. Confirmation received (17 April 2018) that the Council has no record of any abstractions.



Date	Form of correspondence	Key topics discussed and key outcomes
March 2018	E-mail	Obtain local geology and contaminated land information across the Scheme.
July 2018	E-mail	Agreement of construction noise receptors with the Waste Enforcement and Environmental Protection Officer.
July 2018	Meeting	Role of the LPA in the DCO process.
August 2018	E-mail	Consulted on the cumulative schemes. Further information was subsequently received from Wyre Council. Developments that met the Cumulative Effects Assessment (CEA) assessment criteria are included within the assessment.
December 2018	Meeting	Meeting with Wyre to discuss the draft SoCG and provide update in relation to the Scheme.
February / March 2019	E-mail	Detailed comments received from Wyre Council on the draft SoCG regarding archaeology, air quality, noise and vibration and geology and soils.
March 2019	Meeting	Meeting with Wyre to discuss their Relevant Representations and their detailed SoCG comments.
March 2019	E-Mail	Additional comments received on the draft SoCG from Wyre Council.
May 2019	E-Mail	Additional comments received on the draft SoCG from Wyre Council.

2.1.2 It is agreed that this is an accurate record of the key meetings and consultation undertaken between (1) Highways England and (2) Wyre Council in relation to the issues addressed in this SoCG.

### 3 STATEMENTS OF COMMON GROUND

Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
<b>NOISE AND VIBRATION</b>			
<b>Scope of the Assessment</b>			
<p>Section 11.4 of ES Chapter 11: Noise and Vibration (document reference TR010035/APP/6.11) sets out the scope of the assessment as follows:</p> <ul style="list-style-type: none"> <li>• Construction noise impacts are considered within an area up to 300m from the Scheme and have been assessed at 18 selected worst-case sensitive receptors.</li> <li>• Construction vibration impacts are considered within the immediate vicinity of piling operations and have been assessed at 11 selected worst-case sensitive receptors.</li> <li>• Noise impacts from construction vehicles have been considered within 300m of any road/route identified as experiencing temporary increases in HGV activity.</li> <li>• The operational noise study area has been derived in accordance with the Design Manual for Roads and Bridges (DMRB) requirements as detailed in paragraphs 11.4.8 to 11.4.11.</li> </ul> <p><i>Wyre Council agrees with the scope of the assessment.</i></p>	Agreed	Agreed	<b>AGREED</b>

Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
<b>Methodology</b>			
<p>Section 11.3 of ES Chapter 11: Noise and Vibration (document reference TR010035/APP/6.11) summarises the desk study, survey and assessment methodologies. The assessment was carried out in accordance with the following standard methods and best practice guidance which are detailed in Table 11-2 in paragraph 11.3.1:</p> <ul style="list-style-type: none"> <li>• BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites. Noise, British Standards Institution, 2014</li> <li>• BS 5228-2:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites. Vibration, British Standards Institution, 2014</li> <li>• Calculation of Road Traffic Noise (CRTN), Department for Transport and Welsh Office, 1988</li> <li>• Converting the UK traffic noise index LA10, 18h to EU noise indices for noise mapping, TRL limited, PR/SE/451/02 dated 2002</li> <li>• Interim Advice Note (IAN) 185/15</li> <li>• DMRB, Volume 11 Section 3 Part 7 (HD213/11) 'Noise and Vibration'</li> </ul> <p><i>Wyre Council agrees with the survey and assessment methodologies.</i></p>	Agreed	Agreed	<b>AGREED</b>

Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
<b>Baseline</b>			
<p>Section 11.5 of ES Chapter 11: Noise and Vibration (document reference TR010035/APP/6.11) summarises the existing and future baseline information identified during the desk study and field surveys. The survey results are presented in paragraphs 11.5.1 to 11.5.13 and provided in full in Appendix 11.1.</p> <p>The baseline and future assessment years used in the assessment were 2022 and 2037 respectively.</p> <p><i>Wyre Council considers the existing baseline and future baseline to be appropriate.</i></p>	Agreed	Agreed	<b>AGREED</b>
<b>Mitigation Measures</b>			
<p>Section 11.6 of ES Chapter 11: Noise and Vibration (document reference TR010035/APP/6.11) sets out the construction and operational phase mitigation measures for the Scheme. An Outline Construction Environmental Management Plan (CEMP) (document reference TR010035/APP/7.2) has been prepared together with a Record of Environmental Actions and Commitments (REAC) (document reference TR010035/APP/7.3).</p> <p>During the operation phase, the following mitigation is proposed:</p>	Agreed	Agreed	<b>AGREED</b>

Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
<ul style="list-style-type: none"> <li>• A low noise/thin surfacing system surface</li> <li>• Acoustic barriers</li> <li>• Acoustic/landscape bunds</li> </ul> <p>The proposed locations of these barriers are shown in the Environmental Masterplan (document reference TR010035/APP/6.19).</p> <p><i>Wyre Council agrees with the mitigation proposed subject to amendments being made to the REAC as agreed in the meeting on the 12/03/2019 (refer to Appendix A).</i></p>			
<b>Residual Effects and Conclusions</b>			
<p>The Scheme's residual effects are outlined in Section 11.7 of ES Chapter 11: Noise and Vibration (document reference TR010035/APP/6.11).</p> <p>Noise and vibration levels generated during the construction phase of the Scheme are predicted to have no significant adverse impacts on health and quality of life, noise sensitive receptors or residential dwellings.</p> <p>During the operation phase, a reduction in road traffic is predicted to result in a significant beneficial impact on noise</p>	Agreed	Agreed	<b>AGREED</b>

Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
<p>levels at sensitive receptors located on the north of Mains Lane and Garstang New Road. Noise sensitive receptors located in the vicinity of Lodge Lane bridge, Scheme tie-in with Mains Lane (adjacent to new Skippool Bridge junction) and Moorfield Park Development (adjacent to new Poulton junction) are predicted to experience significant increases in road traffic noise.</p> <p><i>Wyre Borough Council Wyre Council agrees with the residual effects conclusions presented in the ES.</i></p>			
<p><i>Wyre Council agrees with the methodology, assessment and conclusions reached within Chapter 16: Cumulative Effects (document reference TR010035/APP/6.16) relating to cumulative / in-combination effects (on and with other major projects and proposals) and noise and vibration.</i></p>	Agreed	Agreed	<b>AGREED</b>
<b>Monitoring</b>			
<p>Section 11.8 of ES Chapter 11: Noise and Vibration (document reference TR010035/APP/6.11) sets out the monitoring requirements for the Scheme, which is secured through the Outline Construction Environmental Management Plan (CEMP) (document reference TR010035/APP/7.2). Monitoring would be undertaken before and during the construction phase. The results of the monitoring would be reviewed to ensure that the mitigation measures for the Scheme continue to be appropriate and</p>	Agreed	Agreed	<b>AGREED</b>

Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
<p>effective.</p> <p>Prior to the commencement of construction, a programme of noise monitoring would be undertaken for a minimum of 10 days at a number of agreed locations (see paragraph 11.8.2) to establish the baseline noise conditions immediately prior to the commencement of construction.</p> <p>Noise monitoring at the agreed locations would be repeated periodically during the construction phase. The Noise and Vibration Management Plan would set out the duration and frequency of these noise surveys along with construction noise limits and would be drafted and consulted upon with the Environmental Health Departments of both Fylde Borough Council and Wyre Council.</p> <p><i>Wyre Council agrees with monitoring proposed.</i></p>			
<b>AIR QUALITY</b>			
<b>Scope of the Assessment</b>			
<p>Section 6.3 of the ES Chapter 6: Air Quality (document reference TR010035/APP/6.6) states that the air quality assessment has assessed the impacts of the Scheme during both construction and operation. Nothing has been scoped out of the assessment.</p> <p><i>Wyre Council agrees with the scope of the assessment.</i></p>	Agreed	<p>Not Agreed</p> <p>The issue of committed developments remains unresolved. If there</p>	<b><i>UNDER DISCUSSION (Refer to Appendix A)</i></b>

Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
		are extant permissions or allocations in plans that have potential to significantly alter vehicle flows then air quality should be revised to take into account. (See email From Simon Kirby)	
<b>Methodology</b>			
<p>Section 6.3 of the ES Chapter 6: Air Quality (document reference TR010035/APP/6.6) summarises the survey and assessment methodologies. The surveys and assessments were carried out in accordance with the following standard methods and best practice guidance:</p> <ul style="list-style-type: none"> <li>• HA207/07 DMRB Volume 11, Section 3, Part 1, May 2007</li> <li>• Local Air Quality Management Technical Guidance LAQM.TG (16) issued by the Department for the Environment, Food and Rural Affairs (Defra)</li> <li>• IAN 170/12v3 Updated air quality advice on the assessment of future NOx and NO<sub>2</sub> projections for users of DMRB Volume 11, Section 3, Part 1 'Air Quality, November 2013, the document is accompanied by an</li> </ul>	Agreed	Not Agreed (see above comment)	<b><i>UNDER DISCUSSION (Refer to Appendix A)</i></b>



Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
<p>Excel-based tool as (available on request from Highways England)</p> <ul style="list-style-type: none"> <li>• IAN 174/13 Updated advice for evaluating significant local air quality effects for users of DMRB Volume 11, Section 3, Part 1 Air Quality (HA207/07), June 2013</li> <li>• IAN 175/13 Updated advice on risk assessment related to compliance with the EU Directive on ambient air quality and on the production of Scheme Air Quality Action Plans for users of DMRB Volume 11, Section 3, Part 1 Air Quality (HA207/07), June 2013 (or latest update available at the time of the assessment)</li> <li>• IAN 185/15, Updated traffic, air quality and noise advice on the assessment of link speeds and generation of vehicle data into 'speed-bands' for users of DMRB Volume 11, Section 3, Part 1 'Air Quality and Volume 11</li> </ul> <p><i>Wyre Council agrees with the survey and assessment methodologies.</i></p>			
<b>Baseline</b>			
Section 6.5 of ES Chapter 6: Air Quality (document reference TR010035/APP/6.6) summarises the existing and future baseline information identified during the desk study.	Agreed	Not Agreed (see above comment)	<b><i>UNDER DISCUSSION (Refer to Appendix A)</i></b>

Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
<p>There is one AQMA (Chapel Street AQMA in Poulton-le-Fylde) designated within the air quality study area in Wyre, approximately 1.2km south-west of Skippool Junction. The AQMA is designated for NO<sub>2</sub>.</p> <p>Recent air quality monitoring results do not report any exceedances of the AQS Objectives. The maximum recorded NO<sub>2</sub> concentration in 2015 was 32.9µg/m<sup>3</sup> at a monitoring site in Chapel Street, which is well below the AQS Objective.</p> <p><i>Wyre Council considers that the baseline presented is appropriate.</i></p>			
<b>Mitigation Measures</b>			
<p>Section 6.6 of ES Chapter 6: Air Quality (document reference TR010035/APP/6.6) sets out the construction phase mitigation measures for the Scheme. An Outline CEMP (document reference TR010035/APP/7.2) has been prepared together with a REAC (document reference TR010035/APP/7.3). Standard dust mitigation measures included in the REAC are presented in Table 6-6 in paragraph 6.6.2.</p> <p>Following a meeting on the 12/03/2019 with Wyre Council additional mitigation measures relating to Environmental Control were agreed. These are outlined within Appendix A.</p>	Agreed	<p>partially Agreed</p> <p>There appears to be little clear connection between the statements proposed in the statement of common ground and appendix A Record of engagement in</p>	<b><i>UNDER DISCUSSION</i></b>

Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
<p>The Outline CEMP and REAC have been updated to include these additions and Revision 1 of these documents will be submitted to the Inspectorate at Deadline 2.</p> <p>No mitigation measures are required during the operation of the Scheme.</p> <p><i>Wyre Council agrees with the mitigation measures proposed subject to amendments being made to the REAC as agreed in the meeting on the 12/03/2019 (refer to Appendix A).</i></p>		<p>relation to matters pertaining to Environmental Control.</p> <p>A Clear statement of intent should be added to the Statement of common ground clearly indicating that all matters in the record of Engagement (appendix A as agreed in principle by Wyre Borough Council will be implemented by the applicant. See JF email.</p>	
<b>Residual Effects and Conclusions</b>			
<p>The Scheme's residual effects are outlined in Section 6.7 of ES Chapter 6: Air Quality (document reference TR010035/APP/6.6).</p> <p>Construction phase impacts from dust and emissions would</p>	Agreed	Not Agreed	<b><i>UNDER DISCUSSION (Refer to Appendix A)</i></b>

Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
<p>be negligible following the implementation of mitigation measures outlined in the Outline CEMP (document reference TR010035/APP/7.2) and REAC (document reference TR010035/APP/7.3)</p> <p>The assessment also predicts that the Scheme would not have a significant effect on local air quality during operation.</p> <p><i>Wyre Council agrees with the residual effects and conclusions.</i></p>			
<p><i>Wyre Council agrees with the methodology, assessment and conclusions reached within Chapter 16: Cumulative Effects (document reference TR010035/APP/6.16) relating to cumulative / in-combination effects (on and with other major projects and proposals) and air quality.</i></p>	Agreed	Not Agreed	<b>UNDER DISCUSSION</b> (Refer to Appendix A)
<b>Monitoring</b>			
<p>Section 6.8 of ES Chapter 6: Air Quality (document reference TR010035/APP/6.6) sets out the monitoring requirements for the Scheme, which is secured through the REAC (document reference TR010035/APP/7.3).</p> <p>The Outline CEMP (document reference TR010035/APP/7.2) contains information relating to the monitoring that would be undertaken during construction. The monitoring involves visual checks and monitoring of the</p>	Agreed	Agreed	<b>AGREED</b>

Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
<p>works to ensure compliance with the CEMP during construction.</p> <p>No monitoring of air quality is recommended during operation.</p> <p><i>Wyre Council agrees with the monitoring proposed.</i></p>			
<b>CULTURAL HERITAGE</b>			
<b>Scope of the Assessment</b>			
<p>Section 7.3 of the ES Chapter 7: Cultural Heritage (document reference TR010035/APP/6.7) states that numerous heritage receptors have been scoped out of the assessment, as it has been deemed that they would experience no impact from the Scheme. The method by which designated and non-designated receptors were scoped out is detailed in paragraphs 7.3.1 and 7.3.2. These paragraphs also outline the scope of the assessment which covers designated and non-designated receptors located within the draft order limits or whose setting are deemed to extend to within the draft order limits and located within the Zone of Theoretical Visibility. Effects are assessed both during construction and operation.</p> <p><i>Wyre Council agrees with the method of scoping the</i></p>	Agreed	Agreed	<b>AGREED</b>

Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
<i>assessment.</i>			
<b>Methodology</b>			
<p>Section 7.3 of the ES Chapter 7: Cultural Heritage (document reference TR010035/APP/6.7) sets out the approach to the cultural heritage assessment. The assessment was undertaken in accordance DMRB Volume 11, Section 3, Part 2 along with the Historic Environment Good Practice Advice in Planning Note 2.</p> <p><i>Wyre Council agrees with the assessment methodology.</i></p>	Agreed	Agreed	<b>AGREED</b>
<b>Baseline</b>			
<p>Section 7.5 of ES Chapter 7: Cultural Heritage (document reference TR010035/APP/6.7) summarises the existing and future baseline information identified during the desk study, consultations and field surveys.</p> <p>There are a total of 77 heritage receptors within the draft order limits and the zone of influence. The majority of the receptors (61 no.) within the draft order limits date to the post-medieval period and are all of low value and historic / archaeological interest. The peat deposits of unknown date are of medium value and archaeological interest.</p>	Agreed	Agreed	<b>AGREED</b>

Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
<p>The remaining 16 heritage receptors that are located within the zone of influence comprise four receptors of medium value which consist of a Grade II listed building, a Conservation Area and two railways. The remaining 12 heritage receptors within the zone of influence are all of low value and historic/archaeological interest.</p> <p><i>Wyre Council considers the baseline presented is appropriate.</i></p>			
<b>Mitigation Measures</b>			
<p>Section 7.6 of ES Chapter 7: Cultural Heritage (document reference TR010035/APP/6.7) set out the construction and operational phase mitigation measures for designated and non-designated heritage receptors. An Outline CEMP (document reference TR010035/APP/7.2) has been prepared together with a REAC (document reference TR010035/APP/7.3) which document commitments the contractor would have to adhere to during construction. Mitigation is also presented on the Environmental Masterplan (document reference TR010035/APP/6.19).</p> <p>A programme of further investigation is also proposed. A trial trenching plan and Project Design has been consulted with the Archaeological Advisor to Lancashire County Council. 50 trial trenches are proposed once landowner agreement is secured and the Contractor has been</p>	Agreed	Agreed	<b>AGREED</b>

Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
<p>appointed. This is likely to be mid-2019.</p> <p>Following the trial trenching a draft Written Scheme of Investigation together with a Mitigation Strategy would be produced in consultation with the Archaeological Advisor to Lancashire County Council, prior to the commencement of any archaeological works.</p> <p>The mitigation strategy will include a combination of screening, archaeological monitoring and excavation and historic building recording.</p> <p><i>Wyre Council agrees with the mitigation measures proposed including the proposed strategy for dealing with archaeological remains, including archaeologically significant peat deposits.</i></p>			
<b>Residual Effects and Conclusions</b>			
<p>The Scheme's residual effects are outlined in Section 7.7 of ES Chapter 7: Cultural Heritage (document reference TR010035/APP/6.7) in relation to cultural heritage have been predicted to be moderate adverse on a Grade II listed building and archaeological remains located within the draft order limits and any potential remains associated with the Romano-British settlement receptors, north of Garstang Road. Moderate adverse effects are also considered for undated peat deposits, identified through geoarchaeological</p>	Agreed	Agreed	<b>AGREED</b>



Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
<p>assessment (document reference TR010035/APP/6.7.3). In terms of the Environmental Impact Assessment (EIA) regulations, these adverse effects are considered to be significant. All other effects to heritage receptors are considered to be slight adverse or neutral.</p> <p><i>Wyre Council agrees with the residual effects and conclusions.</i></p>			
<p><i>Wyre Council agrees with the methodology, assessment and conclusions reached within Chapter 16: Cumulative Effects (document reference TR010035/APP/6.16) relating to cumulative / in-combination effects (on and with other major projects and proposals) and cultural heritage and archaeology.</i></p>	Agreed	Agreed	<b>AGREED</b>
<b>Monitoring</b>			
<p>Section 7.8 of ES Chapter 7: Cultural Heritage (document reference TR010035/APP/6.7) sets out the monitoring requirements for the Scheme. Full details of monitoring the Contractor would need to implement is set out in the REAC (document reference TR010035/APP/7.3).</p> <p>The archaeological watching brief, trial trenching and historic building recording would be monitored to ensure that it is being carried out to satisfy current professional guidance.</p>	Agreed	Agreed	<b>AGREED</b>

Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
<i>Wyre Council agrees with the proposed monitoring strategy.</i>			
<b>BIODIVERSITY</b>			
<i>Wyre Council agree to defer agreement of the Biodiversity impact assessment reported in Chapter 8: Biodiversity (document reference TR010035/APP/6.8) to Natural England and other specialist consultee.</i>	Agreed	Under Discussion	<b>UNDER DISCUSSION</b>
<b>LANDSCAPE</b>			
<p>Wyre Council agreed to the landscape viewpoints in e-mail correspondence dating to September 2017 which is summarised in ES Chapter 3: Consultation (document reference TR010035/APP/6.3).</p> <p><i>Wyre Council is happy with the agreed viewpoints.</i></p> <p><i>Wyre Council agree to defer agreement of the landscape and visual impact assessment reported in Chapter 9: Landscape (document reference TR010035/APP/6.9) to Fylde Borough Council.</i></p>	Agreed	Agreed	<b>AGREED</b>
<b>TRAFFIC</b>			
The Applicant completed all traffic modelling forecasting requirements, for which the Local Plan information is an input, in September 2018. The Development Consent Order for this application was submitted for acceptance in	Agreed	Under Discussion	<b>UNDER DISCUSSION</b>

Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
<p>October 2018 and the Wyre Local Plan was adopted in February 2019.</p> <p>The Local Plan information assists with the traffic forecasting process and is the basis of the Uncertainty Log as described in 3.3.27 to 3.3.32 in Transport Assessment (document reference TR010035/APP/7.4). Traffic growth in each local area is defined by the National Trip End Model (NTEM version 7.2) while the Uncertainty Log is used to distribute the forecast NTEM growth in areas where development is planned rather than distributing it evenly across the area. All forecasts are constrained by the NTEM values.</p> <p>In view of the change in status of the Plan since the submission of the Application, a review has been completed to confirm the size and number of allocations and can confirm the following:</p> <p>16/00217 – Arthurs Lane, Hambleton – 165 dwellings (allocation SA1/10 in Local Plan) <a href="#">165 dwellings considered in the core scenario</a></p> <p>16/00905 – London Street, Fleetwood – 38 dwellings <a href="#">Not included</a></p> <p>16/00651 – Land off A586 Great Eccleston – 22 dwellings</p>			

Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
<p>90 dwellings considered in the core scenario</p> <p>16/00742 – Brockholes Crescent, Poulton – 108 dwellings (part of allocation SA1/4 in Local Plan) Land off Holts Lane, Poulton-Le-Fylde, 130 dwellings considered in the core scenario</p> <p>18/00075 – Stalmine – 65 dwellings (allocation SA1/7 in Local Plan) 77 dwellings considered in the core scenario</p> <p>17/01154 – Hardhorn Road, Poulton – 30 dwellings Land at Carr Head Lane Poulton-le-Fylde, 100 dwellings considered in the core scenario</p> <p>18/00614 – Breck Road, Poulton – 12 dwellings 35 dwellings considered in the core scenario</p> <p>18/00860 – Norcross Lane, Thornton Cleveleys – 66 dwellings (part of allocation SA1/9 in Local Plan) 70 dwellings considered in the core scenario</p> <p>Poulton off Tithebarn Street / Poulton Road / Blackpool Road Carleton (allocation SA1/6 in Local Plan) has been increased from 154 to 300 dwellings following examination of the plan which took place during spring/summer 2018. 150 dwellings for Year 2022 and 500 dwellings for Year</p>			

Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
<p>2037 considered in the core scenario</p> <p>As indicated above the number of dwellings accounted for in the Uncertainty Log and subsequently the core scenario forecasts are higher than the adopted Local Plan. London Street, Fleetwood, has not been accounted for individually in the forecasts but due to the number of dwellings and distance from the Scheme, the Applicant is content the National Trip End Model will still account for growth in this area.</p> <p><i>Wyre Council agrees to defer agreement of the traffic and transport matters to the local highway authority (Lancashire County Council).</i></p>			
<b>GEOLOGY AND CONTAMINATED LAND</b>			
<b>Scope of the Assessment</b>			
<p>Section 13.3 of ES Chapter 13: Geology and Contaminated Land (document reference TR010035/APP/6.13) states that the assessment covers impacts from contaminated land during the construction phase on hydrology, hydrogeology and construction workers.</p> <p>Impacts to geological features were scoped out as agreed in the Scoping Opinion. Operational impacts have also been scoped out as agreed in the Scoping Opinion.</p> <p>The study area comprises a 50m corridor either side of the</p>	Agreed	Geology is outside the scope of Environmental Health and therefore we cannot agree statements relating to Geology.	<b><i>UNDER DISCUSSION</i></b>

Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
<p>Scheme extending to 1km for EA registered waste sites, ground water abstraction points and geological features. Reasoning for this study area is provided in paragraphs 13.4.2 to 13.4.5.</p> <p><i>Wyre Council agrees with the scope of the assessment.</i></p>			
<b>Methodology</b>			
<p>Section 13.3 of ES Chapter 13: Geology and Contaminated Land (document reference TR010035/APP/6.13) sets out the methodology for undertaking the desk study, surveys and the assessment in accordance with the following best practice / guidance which includes:</p> <ul style="list-style-type: none"> <li>• DMRB Volume 11 (Highways Agency) (2009)</li> <li>• Model Procedures for the Management of Land Contamination (CLR11) (Environment Agency (EA), 2004)</li> <li>• Environmental Protection Act 1990: Part 2A Contaminated Land Statutory Guidance (Defra, 2012)</li> <li>• Guiding Principles for Land Contamination (EA, 2010)</li> <li>• The Definition of Waste: Development Industry Code of Practice (CL:AIRE, 2011)</li> <li>• Code of Practice for the Sustainable Management of Soils on Construction Sites (Defra, 2009)</li> </ul>	Agreed	Under Discussion	<b><i>UNDER DISCUSSION</i></b>

Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
<ul style="list-style-type: none"> <li>Assessing risks posed by hazardous ground gases to buildings (C665) (CIRIA, 2007)</li> <li>Contaminated land risk assessment. A guide to good practice (C552) (CIRIA, 2001)</li> </ul> <p><i>Wyre Council considers that the methodology is appropriate.</i></p>			
<b>Baseline</b>			
<p>Section 13.5 of ES Chapter 13: Geology and Contaminated Land (document reference TR010035/APP/6.13) presents the existing and future baseline information identified during the desk study and field surveys. The elements covered include:</p> <ul style="list-style-type: none"> <li>Geology and Geodiversity</li> <li>Mining</li> <li>Mineral Safeguarding Areas and Mineral Deposits</li> <li>Hydrogeology and Hydrology</li> <li>Pollution Incidents</li> <li>Historical development</li> <li>Landfill sites/waste management sites</li> <li>Unexploded ordnance</li> </ul>	Agreed	Under Discussion	<b><i>UNDER DISCUSSION</i></b>

Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
<ul style="list-style-type: none"> <li>Contaminated land</li> </ul> <p>Paragraph 13.9.5 summarises the baseline conditions stating that the Scheme is in a rural setting with light industry (garden nurseries, poultry houses and timber yard) being identified along the existing road. These are some distance from the proposed new alignment.</p> <p><i>Wyre Council considers that the baseline presented is comprehensive and appropriate to base the assessment on.</i></p>			
<b>Mitigation Measures</b>			
<p>Section 13.5 of ES Chapter 13: Geology and Contaminated Land (document reference TR010035/APP/6.13) sets out the construction phase mitigation measures for the Scheme. An Outline CEMP (document reference TR010035/APP/7.2) has been prepared together with a REAC (document reference TR010035/APP/7.3). Within these documents a set of best practice working is specified for implementation where necessary through the construction phase of the Scheme. It includes measures such as:</p> <ul style="list-style-type: none"> <li>Removal of contaminated materials</li> <li>Remediation by appropriate in-situ or ex-situ techniques</li> </ul>	Agreed	Under Discussion	<b>UNDER DISCUSSION</b>



Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
<ul style="list-style-type: none"> <li>Controlled storage of chemicals, waste oils and fuels</li> </ul> <p><i>Wyre Council agrees with the mitigation measures proposed, subject to amendments being made to the REAC as outlined in Appendix A.</i></p>			
<b>Residual Effects and Conclusions</b>			
<p>Section 13.9 of ES Chapter 13: Geology and Contaminated Land Environment (document reference TR010035/APP/6.13) summarises the following residual effects associated contaminated land and the Scheme:</p> <ul style="list-style-type: none"> <li>Slight adverse on construction workers and residents as a result of contaminated land</li> <li>Slight adverse on groundwater within the source protection zone and neutral on groundwater outside the Source Protection Zone</li> <li>Neutral on surface water</li> </ul> <p>These effects are likely to be short-term when significant earthwork movements are taking place.</p> <p><i>Wyre Council agrees with the residual effects and conclusions.</i></p>	Agreed	Under Discussion	<b><i>UNDER DISCUSSION</i></b>

Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
<b>Monitoring</b>			
<p>Following a meeting with Wyre Council on the 12/03/2019 wording for an additional commitment to be included within the REAC was agreed regarding – the understanding ground gas – Refer to Appendix A. This commitment has been included within the updated REAC (Revision 1) which will be submitted to the Inspectorate at Deadline 2.</p> <p><i>Wyre Council agrees with the statement above subject to the wording in the REAC being included as agreed at Deadline 2.</i></p>	Agreed	<p>Disagree</p> <p>An additional statement has been added to the REAC (document reference TR010035/APP/7.3) to state “from the current gas monitoring undertaken the risk from ground gases is considered low. This is however based on limited monitoring data. Further assessment should be undertaken to fully establish the risk from ground gas especially in confined spaces and if required appropriate</p>	<b>UNDER DISCUSSION</b>

Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
		mitigation implemented. The updated REAC will be issued in deadline 2. (See email from David Jihson).	
<b>FLOOD RISK</b>			
<b>Scope of the Assessment</b>			
<p>ES Chapter 12: Road Drainage and the Water Environment (document reference TR010035/APP/6.12), paragraph 12.3.1 states that the chapter covers flooding impacts during both the construction and operational phases.</p> <p><i>Wyre Council agrees with the scope of the assessment presented in the ES.</i></p>	Agreed	Agreed	<b>AGREED</b>
<b>Methodology</b>			
<p>ES Chapter 12: Road Drainage and the Water Environment (document reference TR010035/APP/6.12), Section 12.3, provides the methodology used to undertake the assessment on flood risk. The method adopted was taken from Volume 11, Section 3, Part 10 of the DMRB (HD45/09). Section 12.4 summarises the extent of the study areas used to undertake the assessment which covers all</p>	Agreed	Agreed	<b>AGREED</b>

Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
<p>areas of the Scheme potentially within the fluvial and tidal floodplain. Study areas have been agreed as appropriate with the Environment Agency.</p> <p><i>Wyre Council agrees with the methodology adopted for the assessment on flooding.</i></p>			
<b>Baseline</b>			
<p>Paragraphs 12.5.17 – 12.5.22 of ES Chapter 12: Road Drainage and the Water Environment (document reference TR010035/APP/6.12) summarises the baseline for flood risk.</p> <p>The Scheme crosses land that is considered at high risk of flooding from rivers (Flood Zone 3). The source of risk is the Main Dyke / Horsebridge Dyke which are influenced by tidal water levels in the Wyre Estuary. During high tide, flap gates prevent tidal water flowing up the watercourses but also prevent river water from discharging into the estuary. When larger river floods combine with ‘tide locked’ conditions, water can spill out of bank on the Main Dyke, causing flooding of land downstream of the existing A585 and along the Horsebridge Dyke both up and downstream of the crossing.</p> <p>The study area is defended from regular direct inundation from the Wyre Estuary by Environment Agency maintained</p>	Agreed	Agreed	<b>AGREED</b>

Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
<p>flood defenses and areas of higher ground along the estuary frontage.</p> <p>The risk of flooding from surface water is very low along the majority of the existing alignment of the A585 between Skippool and Windy Harbour, however, there are local areas at high risk.</p> <p><i>Wyre Council considers that the baseline presented is appropriate.</i></p>			
<b>Mitigation Measures</b>			
<p>ES Chapter 12: Road Drainage and the Water Environment (document reference TR010035/APP/6.12) summarises the mitigation measures required to ameliorate flood risk.</p> <p>A drainage design has been developed for the operational Scheme that rapidly removes water and prevents flooding of the carriageway. The Scheme would discharge to the receiving water environment via existing and new outfalls. Attenuation would be provided to achieve agreed discharge rates, inclusive of an allowance for climate change resilience. Indicative drawings illustrating key elements of the drainage design are provided in Appendix E of the FRA (document reference TR010035/APP/5.2).</p> <p><i>Wyre Council agrees with the mitigation measures</i></p>	Agreed	Agreed	<b>AGREED</b>

Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
<i>proposed.</i>			
<b>Residual Effects and Conclusions</b>			
<p>ES Chapter 12: Road Drainage and the Water Environment (document reference TR010035/APP/6.12) presents the residual effects and conclusions.</p> <p><i>Wyre Council agrees with the residual effects and conclusions presented in Chapter 12: Road Drainage and the Water Environment that fall within their remit.</i></p>	Agreed	Agreed	<b>AGREED</b>
<b>Monitoring</b>			
<p>Section 12.8 of ES Chapter 12: Road Drainage and Flood Risk (document reference TR010035/APP/6.12) summarises the monitoring requirements for flood risk.</p> <p>It is proposed that Environment Agency flood warnings for the tidal Wyre Estuary are monitored during both construction and operation of the Scheme further detail is outlined in the REAC (document reference TR010035/APP/7.3).</p> <p>During operation of the Scheme key components of the drainage system, such as the proposed wetland ponds, would be subject to routine inspection and maintenance</p>	Agreed	Agreed	<b>AGREED</b>

Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
activities. These activities are detailed in the drainage strategy, which is appended to the FRA (document reference TR010035/APP/5.2).  <i>Wyre Council agrees with the monitoring proposed.</i>			
<b>OTHER ENVIRONMENTAL MATTERS</b>			
<i>Wyre Council agrees with mitigation outlined within the REAC (document reference TR010035/APP/7.3) regarding light modelling and mitigation subject to amendments being made as outlined in Appendix A).</i>	Agreed	Agreed	<b>AGREED</b>
<i>Wyre Council is content with the Statement of Statutory Nuisance (document reference TR010035/APP/5.3).</i>	Agreed	Agreed	<b>AGREED</b>
<b>Draft Development Consent Order</b>			
<i>Wyre Council has reviewed and is content with the contents of the draft Development Consent Order (document reference TR01035/APP/3.1).</i>	Agreed	Agreed	<b>AGREED</b>
<b>Effects on Living Conditions of Residents</b>			
<i>Wyre Council agree that the 'living conditions of residents' includes air quality, noise and vibration, visual amenity and accessibility. Wyre Borough Council is content with the assessment, mitigation measures and conclusions reached in ES Chapter 6: Air Quality (document reference</i>	Agreed	Agreed	<b>AGREED</b>

Matters of Agreement	Highways England in Agreement	Wyre Borough Council in Agreement	Status
<i>TR010035/APP/6.6), ES Chapter 9: Landscape (document reference TR010035/APP/6.9), ES Chapter 10: People and Communities (document reference TR010035/APP/6.10) and ES Chapter 11: Noise and Vibration.</i>			
<b>Planning Policy</b>			
<i>Wyre Council has reviewed the Planning Statement and National Policy Accordance document (document reference TR010035/APP/7.1) submitted to the Inspectorate to support the Scheme and agrees that it sets out the appropriate policy context and relevant material considerations relevant to the consideration of the scheme. Wyre Council cannot agree with the conclusions set out as this is a matter for the Examining Authority and Secretary of State.</i>	Agreed	Under Discussion	<b><i>UNDER DISCUSSION</i></b>



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## Appendix A – Record of Engagement

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*Detailed Comments received from Wyre Council on the draft Statement of Common Ground  
in February / March (various dates)*

*Further Comments received from Wyre Council on the draft Statement of Common Ground  
26/03/2019*

Comment	Highways England's Response
<p><b>Geology and Contaminated Land</b></p> <p>I refer to the draft SoCG / General Comments from Wyre Borough Council sent to us on 12th March for comment in response to our original comments on Environmental Statement Chapter 13: Geology and Contaminated Land</p> <p>I have reviewed the responses of Arcadis from a contaminated land perspective and I'm broadly satisfied. They had originally proposed landfill gas monitoring and I said that's acceptable but might not be absolutely necessary given the lack of enclosed spaces on a road. However, they have responded <i>"there may be some enclosed spaces such as service ducts, inspection chambers which may need to be considered if a higher gas risk is identified"</i>. I would hope such spaces would be covered by Health and Safety regulations that ensured workers entering them were not exposed to gas risks over time such as ventilation before entry and post-construction gas monitoring. However, as originally stated, I always welcome a precautionary approach and additional landfill gas monitoring will certainly do no harm.</p> <p>The only small question raised by latest response is it now states <i>"if additional investigation is undertaken it would be considered prudent to undertake additional gas monitoring"</i> rather than a definitive gas monitoring will be or will not carried out. As they have now identified enclosed spaces, potentially at risk from gas accumulation, they would need to say either way whether it will or won't be carried out. Either way they will need to have good, written protocols to ensure the safety of any workers who occasionally enter these</p>	<p>Noted – no further response required.</p> <p>Noted – no further response required.</p> <p>An additional commitment has been added to the REAC (document reference TR010035/APP/7.3) to state <i>'From the current gas monitoring undertaken the risk from ground gases is considered to be low. This is however based on limited monitoring data. Further assessment should be undertaken to fully establish the risk from ground gas especially in confined spaces and if required appropriate mitigation implemented'</i>. The updated REAC will be issued at Deadline 2.</p>

Comment	Highways England's Response
<p>spaces. However, this is not something that is regulated by the contaminated land condition on any Decision Notice or something I could review. Instead the regulation of this would fall to the HSE and to ensure their guidance <i>Safe work in confined spaces. Confined Spaces Regulations 1997. Approved Code of Practice and guidance is followed.</i></p> <p>I would take this opportunity to reiterate that the responsibility for the safe development of the site rests with the developer. Actions or omissions on their part may lead to liability being incurred under Part 2A of the Environmental Protection Act 1990. Those providing expert advice to developers should be aware of the future reliance that may be placed on it.</p> <p>I trust this clarifies this Departments position.</p>	
<p>The following comments relate to the <b>air quality</b>:</p> <ul style="list-style-type: none"> <li>• <u>Committed developments</u>: The applicants response in the attached SoCG / General Comments document explains that anticipated traffic flows did take account of committed developments. The information on committed developments was based on information that was available in September / November 2017. These traffic figures were used to model air quality, so it is important that they are reasonably representative. I therefore recommend that the Wyre BC planners / traffic specialists are asked if there are extant planning permissions or allocations in plans that have come to light since November 2017 which have the potential to significantly alter vehicle flows within the modelled road network. If not, the issue of committed developments has been adequately addressed.</li> </ul>	<p>Response required from Wyre Council.</p>

Comment	Highways England's Response
<p><b>Noise</b></p> <p><i>'A commitment has been added to REAC (document reference TR010035/APP/7.3) to state the contractor would be happy to release monitoring data in the event of a complaint'.</i> I have referred to TR010035/APP/7.3) chapter 7 (Noise and Vibration) and I cannot see any such commitment. Please ensure that in the above statement that monitoring data in the event of a complaint will readily accessible to Wyre Borough Council</p>	<p>The REAC (document TR010035/APP/7.3) has been updated and will be issued to the Inspectorate at Deadline 2.</p>
<p>Proposed monitoring as submitted to both Wyre Borough Council and Fylde Borough Council would have to be approved prior to the commencement of construction works.</p>	<p>The Contractor once appointed would provide details of proposed monitoring within the Noise and Management Plan. Wyre Borough Council (including the EHO) would be consulted on this plan prior to construction commencing. The production of this plan is secured by Requirement 4 within the draft Development Consent Order (document reference TR010035/APP/3.1). Works on site would not be able to commence until Requirement 4 is discharged.</p>
<p><b>Dust</b></p> <p>I have referred to the dust management plan in TR10035/APP/7.3, which is satisfactory. I concur that there is no need to have 2 dust management plans. But so as to assist anyone navigating through the supporting documentation of your planning application, it would assist if the non-technical summary reflected the actual location of the dust management plan. With this in mind I would request that the non-technical summary be amended to reflect that the dust management plan is not in document TRO10035/APP/7.2 but in TRO10035/APP/7.3.</p>	<p>Document 7.3 is an appendix of document 7.2 which has caused confusion. The requested amendment will be included within a corrections document issued at Deadline 2.</p>
<p><b>Noise</b></p> <p>I have referred to the document reference TR010035/APP/5.5 and no specific reference made to agreement of potentially noisy works by means of S61 Notice.</p>	<p>The REAC (document TR010035/APP/7.3), Outline CEMP (document reference TR010035/APP/7.2) and the Consents and Agreements Position Statement (document reference TR010035/APP/5.5) have all been updated to refer to a requirement for a S61.</p>

Comment	Highways England's Response
<p>The consents and agreement statement should therefore be amended to reflect that noise control from construction works will be controlled in accordance with S61 under provision of Control of Pollution Act agreement, to be submitted and approved prior to commencement at each phase of the construction works</p>	<p>There updated documents will be submitted to the Inspectorate at Deadline 2.</p>
<p><b>Noise</b></p> <p>I have made reference to this document and noted the inclusion of a stakeholder communication plan that includes community engagement before work commences on site. This is noted and accepted.</p> <p>Noted commitment 7C in Record of Environmental Actions and Commitments (REAC) document reference TRO10035/APP/7.3 that the Contractor would be responsible for notifying the local residents of particularly noisy work prior to commencement of those works. Effective communication should be established, keeping residents informed of the type and timing of works involved.</p>	<p>Noted – no further response required.</p> <p>Noted – no further response required.</p>
<p><b>Lighting</b></p> <p>Site light modelling to be submitted in writing and approved by Wyre Borough Council</p> <p>Light spill from Site Lighting shall be in accordance with the Institute of Lighting Professional Guidance Notes for the Reduction of Lighting Professionals and this should be reflected in commitment 4G of document TR010035/APP/7.3.</p>	<p>The REAC (document reference TR010035/APP/7.3) has been updated and will be submitted to the Inspectorate at Deadline 2. The final CEMP and REAC would be prepared by the Contractor and discharged in accordance with the procedure outlined within the draft DCO (document reference TR010035/APP/3.1).</p>
<p>Referred to document reference TR010035/APP/7.3 and I cannot see any note that monitoring of light spill will be carried out to ensure compliance with the Institution of Lighting Professionals' Guidance Notes. The last sentence of the commitment 4G seems to be missing</p>	<p>See above.</p>

Comment	Highways England's Response
<p>some text and goes follows :- This should be undertaken in accordance.</p> <p>I have noted to commitments in TR10035/APP/7.3 that generators to be sited as far as is reasonably possible from noise sensitive residential dwellings.</p> <p>Noted in Appendix 2.1 in Construction Information that Generator is listed on pg. 33 of Construction Information statement under title Steelworks Installation.</p>	<p>Noted – no further response required.</p> <p>Noted – no further response required.</p>
<p>I noted the following commitment in the statement 7.3 Record of Environmental Actions and Commitments pg. 2 (1D)</p> <p><i>“Ensure plan stipulates core working hours to be: 08:00 and 18:00 on weekdays (excluding bank holidays) and from 08:00 to 16:00 on Saturdays.”</i></p> <p>6.21 Appendix 2.1 Construction Information Pg3 2.33-2.35</p> <p><i>“It is expected that some works would need to be carried out at night, road crossings and final surfacing tie ins for example. Night working would be agreed in advance with the local authority. Seasonal construction activities such as earthworks could be subject to an application for extended hours working to make best use of the season. The expected extended working hours would cover 07:00 to 08:00 and 18:00 to 20:00 during week days.</i></p> <p><i>Repairs or maintenance of construction equipment (other than emergency repairs) would typically be carried out outside of core working hours, normally on Saturday afternoons (13:00 to 18:00) or on Sundays between 09:00 and 17:00.”</i></p> <p>Generally accepted operational hours are that that will be no working on Sundays and Bank Holidays and I would therefore object to Sunday working and any hours outside of</p>	



Comment	Highways England's Response
<p>normal construction hours unless carried out under a S61 Control of Pollution Act Notice in agreement with Wyre Borough Council</p> <p>Accepted working hours are the following:-</p> <p>08.00-18.00 Monday to Friday 08.00-13.00 Saturdays No operations on Sunday and Bank Holidays</p> <p>Please amend your permitted working hours to include that there will be no operation on Sundays and Bank Holidays and any working outside these to be formally agreed with Wyre Borough Council by means of a S61 Control of Pollution Act Notice.</p> <p>These core working hours should be an essential element of a Construction Management Plan.</p>	<p>Both the REAC and ES Appendix 2.1: Construction Information (document reference TR010035/APP/6.2.1) stipulate core working hours would be between 08:00 and 18:00 on weekdays (excluding bank holidays) and from 08:00 to 16:00 on Saturdays. A commitment has also been included within the Outline CEMP (document reference TR010035/APP/7.2) and the REAC (document reference TR010035/APP/7.2) to state a S61 consent is required (these updated documents will be submitted to the Inspectorate at Deadline 2).</p> <p>ES Appendix 2.1: Construction Information (document reference TR010035/APP/6.2.1) states '<i>Night working would be agreed in advance with the local authority. Seasonal construction activities such as earthworks <b>could be subject to an application for extended hours</b> working to make best use of the season</i>'. Therefore any extended working hours if required would be subject to an application to Wyre and Fylde Councils.</p> <p>Paragraph 2.3.5 – relates to fixing equipment on site only.</p>
<p>In the column detailing further Wyre Council comments, Jonathan has written the following:-</p> <p><i>'in spite of missing text, the general meaning as I understand is that an assessment in accordance with BS5228-2 has been carried out and noise from</i></p>	<p>Noted – no further response required.</p>



Comment	Highways England's Response
<p><i>vibration in an environmental setting would only be just perceptible and temporary in nature and therefore no further monitoring points are required at this development. I therefore accept that no further monitoring points for vibration are required on the basis that the applicant carried out an assessment in accordance with BS 5228-2 in respect of this new development and this is the outcome.'</i></p> <p>I have interpreted this as meaning Jonathan is satisfied that vibration is likely to be only just perceptible and temporary in nature and accepts that no further monitoring points are required.</p>	

*Further Comments received from Wyre Council on the draft Statement of Common Ground  
01/05/2019*

Comment	Response
<b>Noise and Vibration</b>	
I agree with the assessment methodologies as listed.	Noted – no further response required.
I agree with the baseline statement.	Noted – no further response required.
I agree with the means of minimise construction noise , following the implementation of mitigation measures as outlined in Outline CEMP.	Noted – no further response required.
I agree with the Monitoring of Noise and Vibration by statements as submitted in the application and the implementation of the Outline Environmental Management Plan (CEMP).	Noted – no further response required.
I agree that you have predicted noise and vibration levels generated during the construction phase will have no significant adverse impact on health and quality of life, noise sensitive receptors or residential dwellings.	Noted – no further response required.
<b>Air Quality</b>	
Agree with Air Quality in relation to the means to minimise dust emissions, following the implementation of mitigation measures as outlined in Outline CEMP (document references as stated).	Noted – no further response required.
I agree that if mitigation measures are properly implemented and maintained then <i>[something missing]</i> .	Noted – no further response required.
Saying that there appears to be little clear connection between the statements proposed in the Statement of Common Ground and Appendix A Record of Engagement in relation to matters pertaining to Environmental Control.	Under 'Mitigation' within the Air Quality Section of the Statement of Common Ground Highways England have asked Wyre Council to agree to the following statement ' <i>Wyre Council agrees with the mitigation measures proposed subject to amendments being made to the REAC as agreed in the meeting on the 12/03/2019 (refer to Appendix A)</i> '. However, additional clarity has now been included.

Comment	Response
<p>I should however point out that it is in the Record of Engagement (Appendix A) that environmental issues have been proposed by the applicant and responded to by Wyre Borough Council and ultimately the applicant has satisfactorily addressed the concerns and in principal agreed by Wyre Borough Council.</p>	<p>Noted – no further response required.</p>
<p>Many of these issues in the Record of Engagement do not feature in the Statement of Common Ground.</p> <ul style="list-style-type: none"> <li>• No clear reference to releasing of monitoring data in the event of a complaint</li> <li>• No clear reference to light and control measures to minimise light spill</li> <li>• No clear reference to the submission of a community liaison plan and a complaint procedure</li> </ul>	<p>As above, under 'Mitigation' within the Air Quality Section of the Statement of Common Ground Highways England have asked Wyre Council to agree to the following statement <i>'Wyre Council agrees with the mitigation measures proposed subject to amendments being made to the REAC as agreed in the meeting on the 12/03/2019 (refer to Appendix A)'</i>. All the commitments have been included within the updated REAC which will be submitted at Deadline 2. The REAC is secured by Requirement 2 within the DCO. However, further clarification has been included within the Statement of Common Ground.</p>
<p>A clear statement of intent should be added to the Statement of Common Ground clearly indicating that all matters in the Record of Engagement (Appendix A) as agreed in principal by Wyre Borough Council and pledges made by the applicant in the Record of Engagement.</p>	<p>Further cross references to Appendix A have been included within the Statement of Common Ground.</p>

Comment	Response				
<p>The issue of committed developments has not as yet been resolved. See the section of Appendix A – Record of Engagement that I have copied and pasted below.</p> <div data-bbox="162 421 1145 1193" data-label="Table"> <table> <tr> <th data-bbox="162 421 694 499">Position</th><th data-bbox="694 421 1145 499">Response required from Wyre Council</th></tr> <tr> <td data-bbox="162 499 694 1193"> <p><u>The following comments relate to the air quality:</u></p> <ul style="list-style-type: none"> <li><u>Committed developments: The applicants response in the attached SoCG / General Comments document explains that anticipated traffic flows did take account of committed developments. The information on committed developments was based on information that was available in September / November 2017. These traffic figures were used to model air quality, so it is important that they are reasonably representative. I therefore recommend that the Wyre BC planners / traffic specialists are asked if there are extant planning permissions or allocations in plans that have come to light since November 2017 which have the potential to significantly alter vehicle flows within the modelled road network. If not, the issue of committed developments has been adequately addressed.</u></li> </ul> </td><td data-bbox="694 499 1145 1193"></td></tr> </table> </div> <p>If the traffic information that underpins the modelling is unrepresentative, then the outcome of the air quality modelling will be unrepresentative.</p> <p>The issue of committed developments remains unresolved. I recommend that the relevant information is made available. If there are extant permissions or allocations in plans that have the potential to significantly alter vehicle flows then the air quality assessment should be revised to take them into account. Until the issue of committed development is resolved it wouldn't be appropriate to agree the outcome of the air quality assessment (chapter 6) or to agree with the statement that <i>"The assessment also predicts that the Scheme would not have a significant effect on local air quality during operation."</i></p>	Position	Response required from Wyre Council	<p><u>The following comments relate to the air quality:</u></p> <ul style="list-style-type: none"> <li><u>Committed developments: The applicants response in the attached SoCG / General Comments document explains that anticipated traffic flows did take account of committed developments. The information on committed developments was based on information that was available in September / November 2017. These traffic figures were used to model air quality, so it is important that they are reasonably representative. I therefore recommend that the Wyre BC planners / traffic specialists are asked if there are extant planning permissions or allocations in plans that have come to light since November 2017 which have the potential to significantly alter vehicle flows within the modelled road network. If not, the issue of committed developments has been adequately addressed.</u></li> </ul>		<p>Meeting held with Wyre Council 12/03/2019 where the sites with particular changes in the Local Plan were reviewed, with the most notable change being SA1/6 West of Poulton. Wyre confirmed they were content that the Scheme had taken into account the proposed change. Refer to meeting minutes HE548643-ARC-GEN-A585-MI-ZM-4006.</p>
Position	Response required from Wyre Council				
<p><u>The following comments relate to the air quality:</u></p> <ul style="list-style-type: none"> <li><u>Committed developments: The applicants response in the attached SoCG / General Comments document explains that anticipated traffic flows did take account of committed developments. The information on committed developments was based on information that was available in September / November 2017. These traffic figures were used to model air quality, so it is important that they are reasonably representative. I therefore recommend that the Wyre BC planners / traffic specialists are asked if there are extant planning permissions or allocations in plans that have come to light since November 2017 which have the potential to significantly alter vehicle flows within the modelled road network. If not, the issue of committed developments has been adequately addressed.</u></li> </ul>					
Geology and Contaminated Land					
<p>I have reviewed the <i>A585 Windy Harbour to Skippool - Statement of Common Ground (Wyre Council)</i> document sent to me on 18<sup>th</sup> April 2019. I'm in agreement with the majority of the statements relating to contaminated land, within the GEOLOGY AND CONTAMINATED LAND Section, pages 27-32. I cannot comment on the Geology as this is not my area of expertise and the comments below relate only</p>	<p>Noted – no further response required.</p>				

Comment	Response
to soil contamination and landfill gas.	
<p>I have just one query. Under Monitoring, page 32 it states that “No monitoring with regards to geology and contaminated land is required”. However the Highways Agency response to my earlier enquiry about ground gas monitoring in Appendix A states ‘An additional commitment has been added to the REAC (document reference TR010035/APP/7.3) to state <i>‘From the current gas monitoring undertaken the risk from ground gases is considered low. This is however based on limited monitoring data. Further assessment should be undertaken to fully establish the risk from ground gas especially in confined spaces and if required appropriate mitigation implemented’</i> The updated REAC will be issued at Deadline 2.</p>	<p>Noted – refer to response below.</p>
<p>Whilst I’m in full agreement with this response , it appears to suggest there is at least the possibility of further ground gas monitoring. As such the statement “No monitoring with regards to geology and contaminated land is required” is not accurate. It could be qualified, as with within the earlier mitigation measures by “subject to amendments being made with REAC as outlined in Appendix A”. Or a distinction made on monitoring that no further soil monitoring is required but ground gas could be subject to further risk assessment.</p>	<p>Text updated and cross reference included within the monitoring section to Appendix A.</p>
<b>Planning Policy</b>	
<p>I cannot agree to this at present and would make the following comments:</p> <ol style="list-style-type: none"> <li>1. Page 6 Objective to “Support employment.... Etc” The Wyre Local Plan has now been adopted and is no longer draft. The plan makes provision for 9,200 dwellings in the borough not 4,500. Also it should state that “Wyre Borough has stated its support for the bypass <b>in principle</b>”.</li> <li>2. Page 11 para 2.6.4. Carleton is not a settlement – it is part of Poulton Le Fylde. It is not the Blackpool Green Belt – it is simply the Green Belt, and the Green Belt does not “surround” these urban areas.</li> <li>3. Page 34 Section 3.4 No mention is made of the impact on receptors (new dwellings currently under construction) on land off Garstang Road East on the eastern edge of Poulton Le Fylde approximately 150m away from the new road.</li> <li>4. Page 49 Para 3.8.24. Whilst the text is fine, the heading (in blue) should refer to the adopted Wyre Borough Local Plan 2011-2031 and not to any resaved policies as these are now defunct.</li> <li>5. Page 54. Paras 5.4.3 and 5.5.5. are the same. Is this intentional or an error?</li> </ol>	<p>1. Noted. However, this change does not lead to a fundamental change in the overall points of support for the Scheme.</p> <p>2. Noted. However, it is noted that these errors do not affect the overall planning argument.</p> <p>3. As contained within ES Chapter 6.11: Noise and Vibration (document reference TR010035/APP/6.1 1), the effects at Garstang Road East are not</p>

Comment	Response
	<p>considered to be significant. Locations where a significant change has been predicted have been considered within the assessment.</p> <p>4. Noted. A thorough review of the new policy position has been undertaken, and the conclusions remain unchanged.</p> <p>5. This is intentional, as the paragraphs demonstrate compliance with the National Networks National Policy Statement and National Planning Policy Framework separately.</p>