

From: [Haine, Jonathan](#)
To: [A585 Windy Harbour to Skippool](#)
Subject: Lancashire County Council Local Impact Report
Date: 17 May 2019 14:28:27
Attachments: [letter to Ex A with LIR 17.05.19.pdf](#)
[Final Impact Report.docx](#)


Dear Mr Symons, Please find attached a copy of the County Council's Local Impact Report on the above project together with a letter providing responses to the questions raised in your letter of 16th April 2019.

Yours sincerely

Jonathan Haine

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Date: 17 May 2019

Dear Sir

**PLANNING ACT 2008 – APPLICATION BY HIGHWAYS ENGLAND FOR A585
WINDY HARBOUR TO SKIPPOOL IMPROVEMENT SCHEME.**

I refer to the above application and to the letter from the Examining Inspector dated 16 April 2019.

I attach a copy of the County Council's local impact report submitted under Section 60 of the Planning Act 2008. This report was approved by the County Council's Cabinet meeting on 16 May 2019.

In relation to the Examining Authority's further questions attached to the letter of 16 April 2019, the County Council comments as follows:

- Question 1.4.1 (Archaeology) – The Romano – British settlement remains which have already been identified outside of the area covered by the draft DCO and noted in this question have been subject to a number of phases of archaeological works. These included a desk based assessment and walk over survey, geophysical survey, trial excavation and open area excavation. Whilst of medium value and archaeological interest, none of the remains found as part of those works was in the opinion of the County Council's archaeological advisor, of sufficient importance to merit inclusion in the Schedule of Monuments under the Ancient Monuments and Archaeological Areas Act 1979 or to be otherwise preserved in situ at the expense of development. An alternative impact mitigation approach of 'preservation by record' was instead adopted and the relevant areas of remains, subject to archaeological investigation prior to development. There is no reason to suppose that any further elements of the same settlement site that might be affected by the proposed A585 road scheme would be of any higher value or significance and as such a similar approach to their investigation and impact mitigation appears appropriate. This approach appears to be adequately addressed by Requirement 9 of the DCO. However, it is considered that Requirement 9 should contain some wording such that any earth moving operations within any areas of interest identified in the scheme of investigation are not commenced until such time as the investigation works have been completed. At

present, Requirement 9 only appears to prevent commencement until such time as the scheme has been approved. If the Examining Authority has any further questions in relation to the operation of Requirement 9, the County Council would be happy to advise.

- The County Council notes that the Examining Authority have raised a number of other questions relating to impact on heritage assets (questions 1.4.2 and 1.4.3). Although these questions have not been specifically directed at the County Council, they are issues that have been commented on in its local impact report and fall within the area of expertise of the County Council's Historic Environment Service.

In relation to question 1.4.2, Barnfield Manor, Lodge Farm Cottage and Singleton Lodge pre date 1847 and have been converted from a former farmhouse and associated farm buildings. Singleton Hall and the associated North and South Lodges, Ice House, Grotto and Coach House was constructed as a large country house in the early 1870's. Manor House was constructed in the later 20th century within the former kitchen garden to Singleton Park. Of this group of buildings, only the Ice House has been considered worthy of designation as a listed building. The associated landscaped park was recommended for consideration for inclusion in the Register of Historic Parks and Gardens in 1998, but this was never confirmed by English Heritage and it remains undesignated. Despite this lack of designation, the buildings and park are of some local heritage value and some mitigation is justified.

As a country house, it would not have been intended as a site for the general public and the surrounding park would have provided a buffer and assurance of privacy for the occupiers and guests. As such the establishment of more public access to the area does not support their original design or purpose, but does allow for a wider appreciation of both the historic landscape and buildings, common to many such historic properties and associated grounds. Consequently, the County Council would not object to such proposals.

In relation to question 1.4.3, the original design for this complex of buildings would have included a boundary wall backed by areas of planting. Barnfield Manor, as a former farm building, would not have originally benefitted from such screening but may have acquired it at the time the park was established. The Manor, built in the former kitchen garden, would have also originally benefitted from a surrounding wall. As noted in the question, the local vernacular for such boundaries was generally red brick walls (although cobble and brick or stone can be found on some sites) although only the kitchen garden wall would have been as high as 2 metres. Given the historic setting, it may be appropriate for the screening in this location to be provided by a brick wall rather than a wooden fence with a modern design.

Question 1.6.1 Transportation and traffic: The County Council notes the Examining Authority's questions in relation to these matters, particularly the relationship with the other transport schemes that have been proposed in this area. These matters are addressed in sections 5 and 6 of the County Council's Local impact Report. However, if there are outstanding questions, the County Council would be happy to provide a further response to assist the Examining Authority.

Accompanied site inspection: The County Council notes the locations that have been listed for the accompanied site inspection. It is considered that this list is generally acceptable but consideration should also be given to including the site of the proposed Grange footbridge to enable an appreciation of the scale and likely impact of the proposed structure.

Issue Specific Hearings: The County Council notes the Examining Authority's request for interested parties to identify the matters that they would wish to raise at any issue specific hearing. The County Council has raised a number of issues in its local impact report. However, it is satisfied on the majority of those issues that the County Council's concerns are fully explained in its report and that it will not be necessary to repeat these through a hearing session. However, the Examining Authority will note that a large number of issues have been raised in relation to traffic modelling and detailed junction design. The County Council is hopeful that these issues can be resolved through further meetings and discussion with the applicant. However, if this is not possible or successful, the County Council would wish to reserve the option to further discuss these issues as part of an issue specific hearing.

Yours faithfully

A solid black rectangular box redacting the signature of Jonathan Haine.

Jonathan Haine
Team Leader – Development Management

**APPLICATION BY HIGHWAYS ENGLAND FOR A DEVELOPMENT
CONSENT ORDER FOR THE A585 IMPROVEMENT SCHEME
BETWEEN WINDY HARBOUR AND SKIPPOOL, NEAR POULTON LE
FYLDE**

**LOCAL IMPACT REPORT BY LANCASHIRE COUNTY COUNCIL
UNDER SECTION 60 OF THE PLANNING ACT 2008**

1. Introduction

- 1.1 Highways England has submitted an application for a Development Order Consent Order for an improvement to the A585 trunk road between Windy Harbour and Skippol, Poulton le Fylde. The improvement scheme would consist of a 4.8 km long bypass to the south of the existing A585 Mains Lane. The application is accompanied by an Environmental Impact Assessment.
- 1.2 The application is to be determined by the Secretary of State after consideration by an Inspector appointed by the Planning Inspectorate. This is because the A585 is a trunk road and projects for the construction of new highways for which the Secretary of State is the highway authority fall within the definition of Nationally Significant Infrastructure within the Planning Act 2008. Under the Planning Act 2008, projects for nationally significant infrastructure have to be the subject of an application to the Secretary of State for a Development Consent Order rather than a planning application to the local authority.
- 1.3 Local Authorities in whose areas applications for Nationally Significant Infrastructure Projects are submitted are invited to produce a Local Impact Report. The Planning Act 2008 requires that the Examining Authority (and Secretary of State) must have regard to the Local Impact Report in determining applications for Development Order Consent. The definition of a Local Impact Report in the Planning Act 2008 is 'a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area). The content of the Local Impact Report is a matter for the Local Planning Authority concerned but the Planning Inspectorate has published guidance on its content. This report has been written in accordance with that guidance.
- 1.4 The project also lies within Fylde and Wyre Borough Council areas. The Borough Councils have been invited to produce their own Local Impact Reports.

2. Details of the Proposals

- 2.1 The project is to provide a new dual carriageway bypass with a length of 4.8 km between Windy Harbour at the junction of the A585 / A586 in the east to the existing Skippool Junction on the A585 to the west. The new road would run to the south of the existing A585 therefore bypassing the existing section of the A585 along Mains Lane which would be detrunked following completion of the scheme. A plan showing the detail of the proposals is attached to this report.
- 2.2 The new highway would incorporate a number of new junctions with existing highways:
 - At the western end of the route, the existing Skippool Junction (junction of A588 Breck Road and B5412 Skippool Road) would be converted from a roundabout to a traffic light controlled junction.
 - At the junction with the existing A585 on Mains Lane there would be a new three arm signal controlled junction.
 - At the junction with the A586 Garstang Road East there would be a new signal controlled crossroads (named Poulton junction)
 - At the eastern end of the scheme, the new road would merge with the existing A585 at the Windy Harbour junction.

- 2.3 Between the Skippool Bridge Junction and the new Poulton Junction, the new road would be on embankment. Between Poulton Junction to the east of the crossing of Lodge Lane, the new road would be in cutting. The eastern section of the scheme, where it joins the existing A585, would be at grade with the existing road being widened to dual carriageway standard.
- 2.4 Three new structures are proposed including the replacement of the existing Skippool Bridge where the road crosses the Main Dyke, a bridge to allow Lodge Lane to cross the new road and a new footbridge towards the eastern end of the scheme to carry an existing footpath over the new road.
- 2.5 A number of alterations to the existing road network are proposed upon completion of the new road including:-
- Detrunking of the existing A585 between Skippool Bridge and where the new road would intersect the existing Garstang New Road. Garstang New Road would become a cul de sac at this point. The county council would then become highway authority for the detrunked section of road.
 - The speed limit along the existing A585 would be reduced to 30 mph between Skippool Bridge junction and the end of Garstang New Road east of Little Singleton. A combined footway / cycleway would be provide along this section of road.
 - Alteration of Garstang New Road east of Little Singleton to allow restricted access into agricultural fields and to also provide a shared footway / cycleway along this section as far as the Windy Harbour junction.
 - A reduced 30 mph speed limit along Garstang Road East between the proposed Poulton Junction and Little Singleton.
 - Upgrade to existing street lighting along Mains Lane and Garstang Road East.
- 2.6 The road would have a 70 mph speed limit except for the section to the west of the Skippool Bridge Junction where the number of existing access points would dictate a 40 mph speed limit.
- 2.7 One residential property located close to the western end of the scheme would require demolition in order to construct the new Skippool Bridge junction. Another property in the same area may require demolition due to the proximity of the new road.
- 2.8 The new road would incorporate a number of design features to reduce its environmental impacts including;
- Proposed bunds and mounding located adjacent to the highway which would be approximately 2 metres higher than the proposed carriageway level. The purpose of the bunds would be to help screen the road and mitigate its visual impacts and to provide a barrier to road noise.
 - The use of low noise surfacing materials
 - Replacement of the existing culvert where the Main Dyke passes under the A585 with a bridge to remove a restriction to flow to reduce flood risks upstream of the bridge.

- Restriction of new lighting to the section between Skippool Junction and Skippool Bridge Junction, at Poulton junction and Windy Harbour Junction. The lighting would consist of 12 metre high columns with LED lanterns designed to reduce light spill.
- Flood compensation areas on the section of route adjacent to the Main Dyke.
- Various landscaping works to mitigate for impacts on ecology including dedication of an area of land to the north of the western end of the scheme as a mitigation area for birds associated with the nearby Wyre Estuary.

3. Description of the Application Site and Surroundings

- 3.1 The eastern end of the new road would be at the existing A585 /A586 Windy Harbour junction. This junction has recently been improved to increase its capacity by adding new turning lanes and increasing the size of the junction generally. The new road would then follow the existing A585 in a westerly direction with the existing road being widened to a dual carriageway by creating two new lanes on its southern side. Approximately 1km from the Windy Harbour junction the new road would begin to diverge from the existing road onto agricultural land to the south, crossing a public footpath which would be realigned over the new road via a new footbridge.
- 3.2 The road then trends generally south west towards Lodge Lane. To the south of the proposed road at this point is Singleton Hall together with another property called The Manor. Singleton Hall is a hotel complex with surrounding parkland landscape and which includes a grade II listed ice house structure. The Manor is a similarly large property set in landscaped grounds and is approximately 90 metres from the centre line of the road. The road scheme would result in the loss of some woodland in this area parts of which are subject to tree preservation orders. To limit land take in this area, the cutting would use lengths of retaining wall rather than earth embankment.
- 3.3 This section of road would be in cutting up to 8.5 metres deep at its maximum and would run under Lodge Lane. There are a number of isolated properties located off Lodge Lane close to the point at which Lodge Lane would pass over the new road.
- 3.4 After the Lodge Lane crossing, the route would then swing north westwards across agricultural fields divided by hedgerows towards a new junction with Garstang Road East. The scheme provides for two borrow pits to be developed in this area to provide fill materials for use in the construction of embankments and to reduce the need to import materials. Beyond the Garstang Road East junction the road would continue north westwards across further agricultural fields mainly on embankment up to 5 metres above existing ground level. This part of the route is located in a Flood Zone (Zone 3 with the highest risk of flooding) and a series of flood compensation areas would be constructed between the road and Main Dyke to the south of the road alignment. A new housing estate is located on land to the south of the Main Dyke approximately 130 metres from the centre line of the new road.
- 3.5 The road then curves progressively northwards to a junction with the existing A585 Mains Lane at an existing gap between properties located off Mains Lane (each is approximately 25 metres from the road centreline). The existing A585 would be

remodelled and widened to dual carriageway standard with a new bridge being created over the Main Dyke to replace the existing culvert.

3.6 From the Main Dyke crossing to the western terminus of the new road at Skippool Junction, the improvement would be mainly achieved within the footprint of the existing highway. There are a number of residential properties and a hotel located to the south of the existing Breck Road in this area. A section of this part of the route also lies within the Green Belt.

3.7 The proposed alignment is not subject to any other major planning designations or constraints. The Wyre Estuary is a European wildlife site (Special Protection Area and Special Area of Conservation) and is located to the north of the road alignment (300 metres from road alignment at its closest point)

4. Planning History

4.1 There is no planning history that is relevant to the proposed road scheme.

5. Relevant Planning Policies including policies of the Development Plan

5.1 National Policy Statement: The Government has produced a series of national policy statements against which applications for nationally significant infrastructure will be considered. A National Policy Statement for National Networks was published in December 2014 to guide decisions on proposals relating to the national road and rail networks promoted under the Planning Act 2008.

5.2 The National Policy Statement for National Networks maintains that the national road networks (such as the A585 trunk road) play a significant part in supporting economic growth as well as existing business activity and facilitating passenger, business and leisure journeys across the country. The policy states that there is a critical need to improve the national networks to address road congestion and stimulate and support growth. The Government considers that in their current condition, the national networks will act as a constraint to sustainable economic growth.

5.3 Specifically in relation to roads, the National Policy Statement sets out the pressures on the trunk road network, the delays caused by congestion and the additional pressures that will result from forecasted traffic growth. The Government has therefore concluded that at a strategic level, there is a compelling need for development of the national road network.

5.4 The policy within the National Policy Statement is therefore to bring forward improvements to the strategic road network to address the above needs by:-

- Improving junctions, new slip roads and upgraded technology to address congestion
- Implementing smart motorways to increase capacity and manage performance
- Improve trunk roads in particular by dualling of single carriageway truck roads to increase capacity and improve performance.

5.5 The National Policy Statement sets out that rather than to meet the demands of unconstrained traffic growth through a predict and provide approach, individual schemes will be brought forward to tackle specific issues, including safety.

- 5.6 National Planning Policy Framework: The National Planning Policy Framework does not contain specific policies for nationally significant infrastructure projects. Such projects should be determined in accordance with the decision making framework set out in the Planning Act 2008 and the relevant national policy statement. However, the policies of the National Planning Policy Framework will still be a relevant consideration in the determination of this application for a Development Consent Order. The following paragraphs of the National Planning Policy Framework are considered relevant and should be taken into account in determination of this application:- 11 (presumption in favour of sustainable development), 80 – 83 (Building a strong competitive economy), 110 (Promoting sustainable transport), 127 (Achieving well designed places), 145 – 146 (Green Belts), 155 – 165 (Flood Risk), 175 – 177 (Ecology), 180 – 181 (Pollution), 189 – 199 (Heritage Assets) and 206 (Mineral Safeguarding).
- 5.7 Lancashire County Council Transport Policy: - A safeguarded route for the construction of a road between the M55 and Norcross has featured in the local transport policy for some time. Three options were contained within a Government White paper published in 1987 and the option linking junction 4 of the M55 to Norcross was subsequently selected as the preferred route and was called the Fylde Coast Easterly Bypass. Following removal of the Scheme from the national trunk road programme in the 1994 review, the county council resolved in 1996 to safeguard the route for development control purposes. Policy 34 of the Lancashire Structure Plan 1991 – 2006 included this road as a scheme which the county council would seek to construct in the period up to 2006. In recognition of this policy, the Fylde Local Plan 2005 safeguarded the land required for the construction of the Fylde Coast Easterly Bypass (Policy TR11).
- 5.8 Lancashire Local Transport Plan: Lancashire County Council has produced a local transport plan which sets out local transport improvement priorities over the period between 2011 and 2021. Improvements to the trunk road network serving Fleetwood are listed as one of the priorities in terms of providing new highway capacity.
- 5.9 The county council has also adopted a series of Highways and Transport Masterplans, the purpose of which is to implement the broad transport priorities set out in the Local Transport Plan. The Masterplans set out major changes to the highways, public transport, and walking / cycling facilities which would bring economic benefits across the county, unlock land for development and provide for the management of traffic. A Masterplan has been adopted (July 2015) for the Fylde Coast which covers the area subject to the current application. See <https://www.lancashire.gov.uk/council/strategies-policies-plans/roads-parking-and-travel/highways-and-transport-masterplans/fylde-coast-highways-and-transport-masterplan/>
- 5.10 The Fylde Coast Masterplan deals in detail with the A585 corridor. It notes that the existing road bypasses all of the main towns along its route but still passes through a number of smaller settlements and the section between Skippool and the M55 has a number of priority junctions with side roads and other minor accesses. It notes that traffic flows on the section of the A585 between Skippool and Windy Harbour are around 28,000 vehicles per day of which almost 1600 are HGVs.

- 5.11 The Masterplan summarises the capacity and safety issues on the existing A585 due to insufficient junction capacity and high flows leading to low average speeds between Norcross and Windy Harbour not only during peak times but increasingly at off peak times and weekends. It notes that these problems create congestion on the network leading to unreliable journey times. The nature of the existing A585 also results in road safety issues and traffic diverting onto less suitable roads in order to avoid congestion at the junctions onto the A585.
- 5.12 The Masterplan also considers the county council's own proposals for highway improvements in the area, in particular the construction of a new road to link the M55 with Norcross (called the Blue route). The Blue Route would involve construction of a new 7.5 kilometre dual carriageway road between the M55 east of Junction 4 at Peel Hill (Blackpool) and the A585 Mains Lane at Skippool and associated on-line widening of approximately 3.5 kilometres of the A585 to dual carriageway from Skippool to Victoria Road, Cleveleys.
- 5.13 Whilst the Masterplan notes the benefits that would be achieved by the Blue Route in terms of reducing congestion and improving safety, the county council concludes that the scheme is not deliverable in the foreseeable future due to a lack of funding and therefore alternative solutions need to be investigated.
- 5.14 Fylde Borough Council adopted a replacement local plan on 22nd October 2018. The replacement local plan includes policies on local transport improvements including those required to address issues on the A585. Fylde Borough Council considers that the Blue Route should be safeguarded until such time as an alternative highway solution is proposed to alleviate congestion on the A585. The whole of the Blue Route between Skippool Bridge and the M55 is therefore safeguarded by Policy T1 of the Local Plan to prevent other development that might prevent the road from being constructed in the future.
- 5.15 Wyre Borough Council adopted a new local plan in February 2019. Although only a very small part of the proposed highway lies within Wyre Borough, the A585 as a main arterial route has an important role to play in the local economy within Wyre. Policy CDMP6 therefore states that land required for transport and highway improvements in the Local Transport Plan, Fylde Coast Highways and Transport Masterplan and any other scheme or strategy by the Highways Authority or Highways England is safeguarded so that they are not compromised.
- 5.16 The county council notes that a number of the chapters of the Environmental Statement make reference to the Lancashire Structure Plan. The Examining Authority should note that the Lancashire Structure Plan no longer forms part of the adopted Development Plan for this area.

6.0 **Commentary on Policy Context**

- 6.1 The National Policy Statement for National Networks establishes the broad policy criteria for considering improvement schemes to trunk roads such as the A585. It sets out the need for undertaking improvements to the network in order to improve reliability and safety and states that there is a compelling need for such improvements to be undertaken.

- 6.2 The A585 trunk road links Fleetwood and the extensive urban areas of North Blackpool, Thornton-Cleveleys and Poulton-le-Fylde with the M55 at Junction 3 north of Kirkham. Although it remains part of the Strategic Road Network, the national role of the A585 as part of an inter-regional route between Great Britain and Northern Ireland through the Port of Fleetwood ceased with the withdrawal of the Ro-Ro ferry service to Larne in December 2010. The route nevertheless remains important to the wider Fylde Coast economy and its continued safe and effective operation is vital to the delivery of Wyre Borough's Local Plan, the regeneration of Fleetwood and the success of the Hillhouse International Enterprise Zone at Thornton. Hillhouse is a prime location for industrial and commercial development and is currently home to several multi-national companies engaged in the manufacture of advanced materials and polymers. Growth in the Irish Sea offshore wind energy sector is a long-term economic opportunity for Fleetwood and the wider Fylde Coast area, with the port well placed to support ongoing operations and maintenance.
- 6.3 The A585 is a single carriageway road of variable standard, and although there are bypasses of all the main towns along the route, it still passes through a number of smaller settlements. Whilst most of the junctions with other main roads are roundabouts or controlled by traffic signals, a significant number of uncontrolled junctions with side roads and other minor accesses remain, particularly on the unimproved section between the M55 and Skippool. Beyond Skippool, the A585 is a modern standard single carriageway. The Dock Street Link in Fleetwood, completed in January 1993, provided improved access to the dock area and former ferry terminal. Traffic flows are consistently above 20,000 vehicles per day throughout the length of the route between the M55 and Cleveleys, peaking at 32,000 vehicles per day on Mains Lane east of Skippool. Use of the A585 by heavy goods vehicles has reduced following closure of the port, but numbers remain significant with around 1,300 HGVs per day on the unimproved section north of the M55.
- 6.4 Congestion is an ongoing issue between the M55 and Cleveleys, principally due to insufficient junction capacity, and is particularly severe at the traffic-signal controlled junctions with the A586 at Little Singleton and the A588 Shard Road. Peak periods have extended in duration, with low average speeds observed between the Norcross and Windy Harbour junctions, and congestion is an increasing problem during off-peak periods and at weekends. This can make journey times unreliable, with consequent implications for local residents, businesses and visitors. The high volume of traffic combined with the sub-standard alignment between the M55 and Skippool results in road safety and operational problems arising from, for example, a lack of right-turning facilities through the settlements of Greenhalgh and Esprick. Diversion of traffic onto less suitable local roads because of capacity problems at junctions remains an issue, with local communities away from the route suffering in terms of poor road safety, noise, air quality and severance. The proposed improvement works to the A585 would assist in addressing some of these issues on the section of trunk road between Windy Harbour and Skippool. The scheme would therefore give rise to a number of the benefits that are referred to in the National Policy Statement and therefore it is considered that the principle of the development is supported by national transport policy.

- 6.5 The adopted Fylde Coast Highways and Transport Masterplan commits the county council to working with Highways England to identify a programme of cost effective, viable improvements to remove the last remaining pinch-points on the route. The county council believes the proposed scheme is a major step forward, addressing the worst remaining bottleneck on the route at the Five Lane Ends traffic-signal controlled junction at Little Singleton and improving the A585 Mains Lane / A588 Shard Road junction. It could also remove rat-running traffic from Singleton and the wider local road network.
- 6.6 The proposed Windy Harbour to Skippool Improvement scheme subject to the Development Consent Order application would not address all of the issues on the A585 between the M55 junction and Skippool and therefore the benefits of the proposed scheme might be less than those that would be achieved through construction of the Blue Route. Notably the proposed scheme would not address any of the deficiencies on the current A585 between Windy Harbour and the M55.
- 6.7 Whilst the Blue Route is safeguarded in the Fylde Local Plan for development control purposes, with an estimated cost of well in excess of £300m, the council does not believe the 'Blue Route' is deliverable as a local major transport scheme. Alternative solutions to what are very real, day-to-day problems in the A585 corridor and its nearby roads therefore need progressing as a matter of urgency.
- 6.8 The proposed scheme does not preclude the construction of the whole 'Blue Route' at a later date so the county council does not consider that there is any conflict with Policy T1 of the Fylde Local Plan. In fact the proposal actually delivers that part of the safeguarded route between Skippool Junction and Garstang Road East.
- 6.9 The county council notes the representations that have been received regarding the predicted effectiveness of the scheme and the issues that would remain on the unimproved part of the A585. An on line improvement of the A585 between Windy Harbour and junction 3 on the M55 would not be possible due the impact on the existing development along this stretch of road. However, it would be possible to bypass this whole length of road, a scheme which the county council is pursuing through Transport for the North as a potential for funding in road period 3 (2025 – 2030). If this funding is forthcoming, it would be possible to abandon the Blue Route as Highways England are unlikely to take this scheme forward and it is beyond the county council's ability to deliver given the scale of funding required and a potential local contribution of at least 15% which would equate to around £45m on a total project cost estimated to be £300m. Although the current proposal would not resolve the issues on the whole route, the county council considers that the current proposal can be viewed as part of an incremental approach to resolving the safety and congestion issues on the section of the A585 between the M55 and Skippool.

7.0 Local Environmental Impacts of the Proposed Development

- 7.1 The application for a Development Consent Order is accompanied by an Environmental Assessment that examines the main environmental impacts of the

proposed development. The Environmental Statement was prepared in accordance with a scoping report issues by the Planning Inspectorate on which the county council has been previously consulted.

- 7.2 The Environmental Statement contains chapters relating to the following issues: Air Quality, Cultural Heritage, Biodiversity, Landscape, People and Communities, Noise and Vibration, Road Drainage, Geology and Contamination, Materials, Climate and Cumulative Effects.
- 7.3 In writing this Local Impact Report, the county council has not undertaken its own consultation (except within its own areas of expertise on highways, flooding, public rights of way, historic environment and legal / property issues). However regard has been given to the relevant representations that have been submitted by local residents, statutory consultees and other interested parties in order to understand the issues that are raised by this proposal.

8. Air Quality Effects

- 8.1 The Environmental Statement examines the impacts of the development during both the construction phase (mainly fugitive dust impacts) and during the operation of the scheme in terms of more general air quality issues such as pollutants and particulates from road traffic.
- 8.2 Air quality impacts have been assessed according to the methodology set out in the Design Manual for Roads and Bridges which takes into account various guidance and objectives for local air quality set out in national and European legislation. Modelling has been undertaken to establish local concentrations of NO₂ and PM₁₀ (particulates) in 2015 and to predict levels for the same air quality factors in 2022 (with and without the scheme). A regional assessment has also been carried out for the pollutants but also including CO₂ emissions. The predictions in the assessment have used traffic model data which estimate the traffic levels that would occur on the local highway network over the assessment period. A study area for air quality has been established based upon roads that would see a change of greater than 1000 vehicles in annual average daily flow or in significant changes in speed and therefore covers all of the highways that would experience the most significant changes (both positive and negative) in traffic flows arising from the construction of the scheme.
- 8.3 The Air Quality Directive sets out standards for air quality in terms of NO_x emissions and requires Air Quality Management Areas to be established where there is a failure to reach the stated standards. Air Quality Management Areas are designated by borough councils where annual mean levels of NO₂ exceed the national objective level of 40µg/m³. There is an Air Quality Management Area within the study area within Poulton le Fylde. Highways England have undertaken their own air quality monitoring close to Windy Harbour junction which indicated that NO₂ concentrations were well below the national objective level. However, information submitted to the examination by Fylde Borough Council indicates that current NO_x levels are very close to the EU objective level at Singleton Crossroads.

- 8.4 The National Policy Statement for National Networks requires the Secretary of State to give substantial weight to air quality matters where after mitigation there would be substantial air quality impact. The National Policy Statement says that consent should be refused where the scheme would result in air quality standards breaching the levels specified in the Air Quality Directive or would affect the ability of a non compliant area to achieve compliance within the agreed timescales.
- 8.5 It is considered that the assessment of air quality objectives has been undertaken in accordance with recognised guidance and that air quality impacts have been assessed at the relevant receptors in order to understand the likely air quality impacts of the development. There are 41 locations along the line of the scheme and the existing roads that have been used as assessment locations comprised of existing and proposed residential development.
- 8.6 The assessment shows that the largest difference in air quality in 2022 between the 'with scheme' and 'without scheme' is at a residential property located off Mains Lane close to the Singleton Crossroads where there would be a $10\mu\text{g}/\text{m}^3$ improvement in terms of annual mean NO_2 concentrations. There are other residential properties along Mains Lane where there would also be improvements in air quality due to the transfer of traffic flows onto the new road located at further distance from these properties. Out of the 41 assessment locations, there are approximately 18 properties where air quality would be detrimentally affected. However, in all cases the effect is minor and would not result in air quality breaching the objective level. The worst affected properties are located adjacent to the Lodge Lane bridge. The assessment shows that there would be a worsening of air quality within the Air Quality Management Area in Poulton le Fylde in the base year of the assessment but that there would be a small decrease as a result of the scheme. Similar trends are shown for particulates.
- 8.7 In relation to dust emissions during construction, the main issue will be when construction works take place very close to existing properties. This will particularly relevant for certain properties in the Skippool area which are located very close to the proposed new road and those located off Lodge Lane where there will be considerable excavation and earthmoving required to create the proposed cutting. There is a risk of significant dust impacts at these properties if mitigation is not provided. However, it is considered that such impacts could be reduced to acceptable levels provided that mitigation is properly employed. Such measures should be detailed in a Construction Management Plan which should be the subject of a requirement forming part of any Development Consent Order for this scheme.
- 8.8 Calculations have also been undertaken of emissions on a regional level including for CO_2 . CO_2 levels show a marginal increase; whilst the new road would attract and generate more traffic, such increases would be balanced by technological advances including electric vehicles.
- 8.9 The conclusion on air quality is therefore that the scheme would not worsen air quality in their Quality Management Area and would not result in any impact such that any new Air Quality Management Areas would require designation. Overall

there would be improvements in locations currently experiencing air quality impacts from traffic therefore having some public health benefits.

9. Noise

- 9.1 The Environmental Statement contains a chapter to examine the noise impacts of the development. The noise assessment is based upon a survey of existing noise levels in the area to establish background noise levels and to assess the significance of any noise increases or decreases due to construction of the scheme.
- 9.2 Noise impacts have been assessed in accordance with the policy in the National Networks National Policy Statement and the Noise Policy Statement for England together with a range of other legislation and policy. The assessments have been carried out to establish likely noise levels during the construction and operation of the road as a number of noise sensitive properties close to the proposed road and on the existing road network and to establish the need and design of any mitigation measures that might be required to reduce noise to acceptable levels. Noise predictions are made to allow a comparison between the existing noise levels and those that would occur in 2022 and 2037 with, and without, the scheme.
- 9.3 The noise Policy Statement for England requires noise to be assessed in terms of a NOEL (No observed effect level – where there is no observed effect on health or quality of life), LOAEL (Lowest Observed Adverse Effect Level – the level above which some adverse effects can be detected) and SOAEL (Significant Observed Adverse Effect Level – the level above which significant adverse effects on health and quality of life could occur). There is also a UAEL level (Unacceptable Adverse Effects Level) which is exposure to noise of a level which have such impacts that it should be prevented.
- 9.4 The noise impacts have been assessed at 18 locations, all of which are residential properties. There will be more than 18 properties that are affected by noise but the selected locations are considered to be reasonably representative to allow the noise impacts on all properties to be assessed. The location of these receptors was agreed with Wyre and Fylde Borough Environmental Health officers.
- 9.5 For operational noise, the assessment shows that the most significant noise increases (increase greater than 5dB(A)) occur at receptors located on the southern side of Mains Lane facing onto the scheme, those properties on the Moorfield Park development facing the scheme and those properties within 150 metres of the Lodge Lane underpass. 79 dwellings and four sensitive receptors fall within these locations and would be classified as experiencing major adverse noise impacts. 124 and 2 other sensitive receptors are predicted to experience a 3 to 4 dB(A) increase in traffic noise which would be classified as a moderate adverse effect and which would be experienced on the southern side of Mains Lane, on the Moorfield Park development and approximately 150 metres south of the Lodge Lane underpass. A further 699 dwellings and 5 other sensitive receptors would experience lower level of noise increase (between 1 to 2.9 dB(A) increase) – these properties are again located on the Moorfield park development, south of the A586 in Poulton le Fylde and along Skippool Road. In terms of the properties

located on Mains Lane that are identified as being adversely affected to varying degrees, it is assumed that for some of these properties, the scheme would result in noise being moved from the front of the property to the rear of the property. Therefore, these properties may experience no or little change in overall noise level although there would be a change in the way such properties experience the road noise. For example, the rear gardens would experience greater noise than at present.

- 9.6 The applicant states that these impacts have been mitigated to a minimum through use of low noise surfacing materials and specific noise mitigation measures such as bunds and barriers / fences.
- 9.7 The county council as Highways Authority does have experience of using thin surfacing materials and has specified such materials for use on some of its own road building projects in order to reduce noise impacts. However, such materials are relatively new and there is some concern about their durability and long term maintenance costs when compared to hot rolled asphalt. Given these uncertainties, a more robust approach for the noise assessment might have been on the basis that conventional surfacing materials will be used in the event that these materials are eventually used on the road due to concerns about the maintenance costs of using modern thin surfacing materials. The noise assessment undertaken in 2016 for the county council's own Preston Western Distributor Road was conducted on this basis. The Examining Authority may therefore wish to consider requiring a reworking of the noise assessment based upon conventional surfacing materials being used. It is not clear from the Environmental Statement what correction factor has been used in the noise assessment to factor for the use of low noise surfacing materials.
- 9.8 There would also be properties that would experience noise improvements. 95 dwellings and three other sensitive receptors would experience a decrease in excess of 5dB(A). These are along the north side of Mains Lane, those within 130 metres of Garstang New Road and those on the north side of Little Singleton. These improvements are classed as major beneficial. A further 45 dwellings would experience decreases between 3 to 4 dB(A); these properties are also along the north side of Mains Lane and those within 130 to 200 metres of Garstang Road North. A further 154 dwellings and 2 other receptors are predicted to experience lower noise decreases (between 1 – 2.9 dB(A); these are those at 200 metres north of Garstang New Road and east and west of the A588 in Skippool.
- 9.9 In summary, using the applicant's methodology there are predicted to be 1716 dwellings where there would be some increase in road traffic noise. However, in terms of significant noise increase / decrease there are more properties (99) that would experience a decrease in noise above a 'Significant Observed Adverse Effect Level' than those that would experience a similar degree of noise increase (19). However, for those properties that are detrimentally impacted, it will be important to consider the significance of the impact and the design and impact of any mitigation measures.
- 9.10 The noise mitigation measures that are incorporated into the scheme are a combination of use of low noise road surfacing materials, false cuttings, 2 metre

high noise attenuation fencing and also sinking the road in cutting in the Lodge Lane area. These mitigation measures are considered to be generally acceptable with the following comments:

- There is a property called Beeches located off Mains Lane immediately adjacent to the point where the new bypass meets with the existing A585. From the text of the Environmental Statement it appears that a decision has not yet been made whether to demolish this property. If this property is to be retained it is suggested that more noise mitigation needs to be provided than is shown on the Environmental Masterplan drawings as these drawing only show a narrow belt of woodland planting between the road and the property.
- The proposed use of low noise surfacing materials is noted but the Examining Authority is requested to have regard to the county council's comment about such materials at paragraph 9.7 of this report.
- The only property that is likely to be eligible for noise insulation based upon the predicted Increase in noise levels is a property on Lodge Lane called North Lodge. It is not clear why this is the only property that would qualify for such measures given that there are a number of other properties in this area which are located at a similar distance to the proposed highway. North Lodge would also benefit from a 2 metre high noise fence. However, there is also another property located in this area (Larkfield) which does not appear to benefit from the same degree of noise protection. The reason why no mitigation is provided for Larkfield other than planting is not clear.

9.11 The Environmental Statement also assesses the impacts of construction noise. For certain properties very close to the route (such as those located off Mains Lane and Lodge Lane), these impacts are likely to be significant. However, in the main they would be relatively short term. Mitigation measures for such impacts would be required which would need to relate to controls on hours of operation and implementation of specific mitigation measures during certain operational activities. These could be secured through a Construction Environmental Management Plan.

10. Landscape / Visual Impacts

10.1 The Environmental Statement includes a chapter that examines the landscape impact of the proposals. The landscape assessment includes photographic material showing the visual impacts of the scheme from various sensitive receptors along the route alignment. The locations used for the visual impact assessment were previously agreed with Fylde and Wyre Borough Councils and assessment has been carried out in accordance with a recognised methodology for undertaking such studies. A notable absence from the landscape assessment relates to the visual impact on the Grade II listed Ice House structure forming part of Singleton Hall. The absence is due to lack of consent being received to allow the applicant access to the structure to permit photographic material to be obtained. The applicant has obtained other viewpoints from publically accessible locations to allow an assessment of the visual impacts on the Ice House to be made. In general, the assessment methods are considered to be acceptable to allow an assessment of the visual and landscape impacts to be made.

- 10.2 The route of the scheme has been selected to reduce its visual and landscape impacts to a minimum. It does not impact upon any landscapes of national (Area of Outstanding Natural Beauty) or local importance. However, it would still be a major new highway running through an area of predominately undeveloped countryside and would therefore have a significant visual impact, requiring removal of existing landscape features such as hedgerows, trees (some of which are covered by Tree Preservation Orders) and construction of significant cuttings and embankments. There are also a large number of residential properties that have views over the alignment of the proposed road where there would be visual impacts to a greater or lesser degree.
- 10.3 The main landscape impact of the scheme would be the section of new road between Skippool Bridge junction in the west and the junction with the existing A585 in the east. This is the section of the new road that would run through the existing open countryside. The section between the Skippool Bridge Junction and Lodge Lane is characterised by a number of large agricultural fields divided by low hedgerows. The landscape in this area is predominantly flat with few major features such as mature trees or woodlands. It is considered that the contours of the landscape would limit the longer distant views of the proposed road. However, much of this section of the highway would be on significant embankment, especially the section parallel to the Main Dyke. The embankment would be a significant feature and would represent a major adverse change to the existing landscape. It is accepted that this section of road needs to be raised above flood level but it is not clear why this section of the road needs to be raised on such a significant embankment other than it would permit the road to be constructed without requiring significant off-site disposal of surplus excavated material. This part of the scheme would also have a significant visual impact when seen from properties on the south side of Mains Lane and also the new houses currently being constructed off Garstang Road East northwards towards the scheme. These impacts would be partially mitigated by the use of false cuttings and landscaping on the external faces of the embankment but it would take several years for the landscaping to mature to a condition where the mitigation is effective.
- 10.4 For the section from Lodge Lane eastwards, the main landscape impacts relate to the proposed cutting and the removal of various plantations and trees to the north of Singleton Hall to construct the road through this area. The works through this area would have a major visual impact although the county council accepts that the routing options through this area are limited and the option selected is that which minimises the loss of vegetation and visual impact and avoid the need to demolish existing properties. To reduce the impacts through this area, retaining walls are used to support the sides of the cutting in order to reduce land take and loss of existing vegetation. Even with such mitigation measures, the scheme would still result in the loss of woodland in this area, some of which is protected by tree preservation orders and which forms part of the parkland type landscape surrounding Singleton Hall.
- 10.5 Adjacent to the Lodge Lane crossing are a number of individual residential properties (Larkfield, North Lodge and The Manor together with Barnfield Manor which has been divided into a number of units). All of these properties are located

very close to the road alignment (around 30 metres from the cutting in the case of North Lodge). In the case of The Manor and Barnfield Manor it is considered that the route and design of the scheme is such that the visual impact on the properties are minimised as most of the existing vegetation immediately to their northern side is retained thereby retaining their existing setting. New landscaping is proposed to offset the impact of the 2 metre high noise attenuation fencing that is proposed to mitigate noise impacts to these properties. However, it is considered that a continuous hedgerow might be more effective in time to screen the fence than the line of trees that appears to be proposed. For the two properties to the north of the Lodge Lane crossing (Larkfield and North Lodge), some of the existing vegetation to the south of these properties will need to be removed. Some will be retained but particularly in the case of North Lodge, it is considered that there will be a significant impact on the visual amenity and setting of this property. The applicant has prepared photomontage information of this area looking north along Lodge Lane but due to the potential impacts in this area, it is considered that it would have also have been useful to provide information showing the view southwards from North Lodge towards the new bridge.

- 10.6 During the development of the project, the applicant investigated the ability to construct a land bridge in the Lodge Lane area. This would have involved the road to be constructed in a short tunnel. The county council considers that the land bridge would have significantly reduced the visual and noise impacts in this location. However, this option was dismissed due to the costs of construction and does not form part of the current proposal.
- 10.7 In the grounds of Singleton Hall approximately 80 metres east of The Manor is a former ice house which is a listed building (Grade II). It is therefore important to consider the impacts of the new road on the setting of this feature particularly in terms of the guidance in section 16 of the National Planning Policy Framework. The ice house would be approximately 90 metres south of the edge of the cutting. However, the existing woodland immediately surrounding the ice house would be retained and whilst the presence of the new road would have some impacts in this area (in particular through increased noise), the ice house would not be divorced from the remainder of the existing estate buildings and the lakes that may have been the ice source for the building. The significance and setting of the listed building would therefore be maintained. The proposal should therefore be considered against paragraph 196 of the National Planning Policy Framework where there is less than substantial harm to the significance of a designated heritage asset.
- 10.8 The other main landscape impact associated with the eastern end of the scheme relates to the proposal for carrying an existing footpath over the new road. The applicant has included a photomontage of the proposed bridge which would be a large steelwork structure with separate access ramps and staircases which add to its visual impact. The county council considers that the design of this structure is not particularly satisfactory in this rural setting and should be revisited. In particular it should be investigated whether there is scope to divert the footpath alongside the road to the west to where the footpath could cross the proposed cutting via a more simple bridge structure or if an underpass under the new road would be possible. Alternatively, it might be possible to provide some retaining walls against

the sides of the new road to form the abutments of the bridge. Planted embankments could then be formed against the retaining walls to provide a structure more in keeping with this rural location.

- 10.9 At the western end of the new road beyond Skippool Bridge junction, the road improvement scheme would mainly be achieved within the boundaries of the existing A585 where the visual and landscape impacts would be significantly less than the locations further east. However, there would still be very significant visual impacts during the construction phase relating to the remodelling of the existing A585 / A588 roundabout to a traffic light controlled junction, the construction of the new bridge over the Main Dyke and the junction where the new road would meet the existing A585 on Mains Lane.
- 10.10 To conclude on landscape issues, the proposed highway would have major visual and landscape impacts during construction which would only be partially mitigated by landscaping works. The residual impacts would be particularly marked in the Lodge Lane area and are a significant negative impact of the scheme that needs to be considered alongside any benefits that the road would deliver.

11. Ecology / Biodiversity

- 11.1 The Environmental Statement includes a chapter which examines the potential impacts of the proposed highway on ecology / biodiversity. This section of the Environmental Statement is based upon desk top studies of local ecological records together with field studies and surveys for a range of protected species and other ecological interests such as bats, great crested newts, otters, water voles, badgers and over wintering and breeding birds.
- 11.2 The road alignment would not directly affect any international, national or local level ecological designations. However, the Wyre Estuary is located approximately 300 metres from the road at its closest point and forms part of the Morecambe Bay and Duddon Estuary Special Protection Area, designated for supporting internationally important populations of wetland and sea birds. The Wyre Estuary is also a Ramsar site designated for similar reasons. The estuary is also designated as a Site of Special Scientific Interest for its ornithological interests and is also proposed to be a marine conservation zone. There are also three local Biological Heritage Sites in the area (River Wyre, Shard Bridge Field Ditch and Skippool Marsh) that are potentially affected by the scheme.
- 11.3 Paragraphs 170 – 177 of the National Planning Policy Framework relate to ecology and require that where significant harm to biodiversity from a development cannot be avoided, mitigated or compensated for, then planning permission should be refused. Development on land outside a Site of Special Scientific Interest and which is likely to have an adverse on it should not normally be permitted. Where development would result in the loss of irreplaceable habitats (such as ancient woodland and ancient or veteran trees), planning permission should be refused unless there are exceptional reasons and a suitable compensation strategy exists. An overall priority is that the planning system should pursue opportunities for securing measurable net gains for biodiversity.

- 11.4 The methods and surveys that have been used to establish the ecological value of the application site are considered to be generally acceptable. However there does not appear to be any attempt to quantify the value of the trees that would be removed beyond an assessment of whether they are covered by tree preservation orders. It is considered that some assessment should be made as to whether any of the trees to be removed would fall within the 'veteran or ancient' categories referred to in paragraph 175 c) of the National Planning Policy Framework.
- 11.5 There are various ecological habitats and features that would be affected by the development. This would include the removal of 6.3 km of hedgerow of which 4.2 km would be permanently lost. The scheme would also require the removal of 6,287 m² of deciduous woodland at the eastern end of the scheme in the Lodge Lane area. Three ponds would also be permanently lost, although none of these are used by great crested newts. Two buildings which are confirmed bat roosts would be demolished. A number of other individual trees would be removed some of which have bat roost potential. The footprint of the scheme would also occupy a large area of agricultural farm land. Whilst this is the main intensively managed farmland, the over wintering birds surveys confirm that this land is used by bird species that are associated with the European protected sites in the Wyre Estuary. There are also potential impacts on badgers and otters due to the proximity of the scheme to existing habitats or to works that are required to existing streams and watercourses.
- 11.6 The proposals include mitigation measures for the above impacts. These include new woodland planting along both sides of the dual carriageway, replacement of the hedgerows temporarily removed during construction and new hedgerow planting alongside the road for those hedgerows that would be permanently lost. Whilst a greater amount of new hedgerow and tree plant would be provided compared to that removed, it is not considered that this necessarily translates to an overall ecological gain especially when the new planting would be mainly alongside a dual carriageway where disturbance impacts would be much greater.
- 11.7 A wide range of other mitigation measures for the direct impacts of the development are proposed. These include replacement ponds, landscaping of the road drainage mitigation measures, working methods to protect water courses that would be crossed by the scheme and specific measures to address impacts on species such as otters and badgers which are present in the area. The examining authority should ensure that the mitigation measures are sufficiently developed and in suitable locations to ensure that measurable net gains for biodiversity would be delivered as required by paragraph 174b of the National Planning Policy Framework.
- 11.8 The scheme would result in the loss of two confirmed bat roosts. The Examining Authority should therefore assure itself that the tests in the Habitats Regulations are satisfied in relation to the impacts on this particular European Protected Species. In particular there seems to be limited information within section 8.6 of the ecology chapter of the Environmental Statement to demonstrate that the intended mitigation measures for the impacts on bats would be in a suitable location and of suitable design to provide sufficient mitigation for the roosting habitat that would be lost to the scheme. If development consent is granted for the

scheme, it should be subject to a requirement dealing with the provision and design of the mitigation measures for bats.

- 11.9 No part of the scheme would directly affect the Morecambe Bay and Duddon Estuary Special Protection Area. However, there is the potential for indirect effects on this site if the scheme would involve loss of habitat that is used by bird species for which the Special Protection Area is designated. Such loss might occur through loss of habitat or by disturbance to areas used for feeding by construction activities.
- 11.10 Under the Habitats Regulations 2017, where a development would have a likely significant effect on the designated interest features of a European Wildlife Site (such as the Morecambe Bay and Duddon Estuary Special Protection Area), an assessment (called an Appropriate Assessment) must be carried out of the implications for the protected site arising from the project either alone or in combination with other plans or projects. Consent can only be given to a project having ascertained that it will not adversely affect the integrity of any European Wildlife Site unless it can be demonstrated that there are no alternatives or if there are imperative reasons of overriding public interest why the project should proceed.
- 11.11 As part of this process, Highways England have undertaken a screening exercise to establish if the project would have a likely significant effect on any European site. This assessment used the bird survey information that was collected as part of the environmental assessment of the whole scheme. Several of the bird species for which the Special Protection Area is designated were found within the study area at numbers exceeding 1% of the Special Protection Area populations for these species. In such circumstances, it is generally concluded that there would be a likely significant effect and therefore a full Appropriate Assessment is required. It was also considered that there could be water quality implications such that a likely significant effect could not be ruled out.
- 11.12 Recent case law on the assessment of projects under the Habitats Directive has established that the screening process must be carried out without reference to any mitigation measures that might be employed to address impacts on European wildlife sites. The county council considers that the Habitats Regulations Screening Assessment that has been undertaken by the applicant has not taken into account any mitigation measures and therefore has been undertaken in accordance with the most recent interpretation of the law on such matters.
- 11.13 In view of the findings of the screening exercise, a full Appropriate Assessment of the implications of the project for the Morecambe Bay and Duddon Estuary Special Protection Area and Ramsar site has been undertaken relating to disturbance / displacement of birds, loss of foraging / roosting habitat and water quality effects.
- 11.14 Habitats Regulations Assessments are required to take into account other projects or plans to assess if there might be 'in combination' impacts with the proposed development. The list of projects within Appendix 16.1 of the Environmental Statement includes the Preesall Underground Gas Storage Scheme which was granted Development Consent in July 2015 and which is indicated as being within

the cumulative impact assessment due to falling within multiple zones of influence. However, this project does not appear to be included within the list of 'in combination' projects within the Habitats Risk Assessment.

11.15 The Appropriate Assessment concludes that there would be adverse impacts on certain over wintering bird species for which the Special Protection Area is designated. The Assessment indicates that the adverse impacts would mainly be by way of disturbance, particularly during construction works and with a much more limited effect during the operational phase once the noise mitigation and landscaping works become effective. To address impacts during construction, the applicant proposes to establish an ecological mitigation area covering 16.4 ha of agricultural fields to the north of the existing A585. Various management controls would exist on this area over the construction phase so that its value for the relevant bird species is maximised to compensate for that lost to the scheme itself. The Appropriate Assessment concludes that with the mitigation, the proposed development would not prevent the Morecambe Bay and Duddon Estuary Special Protection Area from fulfilling its conservation objectives. The county council generally agrees with the conclusions of the assessment. However, the landscaping alongside the road will take some time to mature to a stage where it provides effective screening for the disturbance impacts of the scheme and a restriction of the management timescale to the duration of construction may not be sufficient to provide adequate compensation. Therefore the Examining Authority should satisfy itself that the management timescale proposed for the mitigation area is appropriate and would be effective. The details of the management works should be the subject of appropriately worded requirements within any Development Consent Order for the scheme or legal agreement.

12. Historic Environment

12.1 The Environmental Statement includes an assessment of the implications of the project for historic environment and cultural heritage issues. The assessment has been based upon a desk top study of various data sources including English Heritage air photographs, information from Lancashire Archives and records from Lancashire Archaeological Advisory Services. The route alignment was also subject to a walkover and further geophysical and geo - archaeological assessments have been undertaken. The scheme was then assessed in relation to the likely impacts on archaeological receptors, historic buildings and historic landscapes.

12.2 Within the draft order limits are two designated cultural heritage assets at Singleton Hall Ice House (60 metres south of the scheme) and Singleton Village conservation area (775 metres south of the scheme). There are no scheduled monuments, world heritage sites, registered battlefields or registered parks and gardens within the draft order limits. There are a further 36 non designated archaeological remains within the order limits, the majority of which are post medieval and of unknown date.

12.3 The county council considers that the overall approach of the assessment is acceptable. However, it is relevant to point out that some additional archaeological fieldwork in this area has been carried out since the archaeological assessment

for the A585 was completed. Fieldwork carried out on a housing development in the Little Poulton area which impacts upon the Romano – British settlement (sites 112 and 193 in the gazetteer) has shown that it is more extensive than previously suspected. The work has also revealed that previous geophysical work has not identified all the elements of the site that have subsequently been revealed by ground excavations. Similar issues have been experienced elsewhere in Lancashire. This means that the findings of the geophysical investigation that has been undertaken for the A585 project are brought into some doubt and strengthens the case for the 'blank areas' with the geophysical survey to be subject to trial excavation prior to main earthworks. It should also be noted that site 12 (possible watermill at Skippool) has been subject to some further desk based assessment and its location now appears to be within the Development Consent Order corridor rather than outside it.

- 12.4 A number of issues were identified with the original scheme of mitigation relating to various sites along the alignment of the scheme. However, it is understood that these issues have now been addressed through further clarification of the scope and likely impact of the scheme. Provided that the updated scheme is subject to a requirement within any Development Consent Order and that the scheme makes provision for further recording should any assets be discovered as part of trial trenching, it is considered that the impact on historic environment assets is acceptable. The potential for impact on as yet unknown assets does not appear sufficient to require a redesign of the scheme or constitute a major objection to the scheme as a whole.

13. Green Belt

- 13.1 A small area of the site at its western end within Wyre Borough lies within the Green Belt. The part of the scheme located within the Green Belt is the new Skippool Junction together with the eastern approach to this junction on the A585. The works undertaken within this area would involve the conversion of the existing Skippool roundabout to a traffic light controlled junction. This would require some widening works into a grass area on the northern side of the existing roundabout. There would also be additional traffic lights and other lighting columns associated with the new junction arrangements.
- 13.2 The National Planning Policy Framework states that building works are inappropriate in the Green Belt unless they are for specified purposes. Certain other forms of development such as engineering operations (which would include the building of roads) and local transport infrastructure are not inappropriate in the Green Belt provided that they preserve its openness and do not conflict with the purposes of including land within it. (Paragraph 146 of the National Planning Policy Framework)
- 13.3 The works that are proposed within the Green Belt outside of the existing highway are relatively minor and comprise the widening of the eastbound approach to the existing roundabout and construction of a new slip road to allow traffic on the A585 to access the B5412 Skippool Road. Whilst these works would increase the footprint of highway infrastructure within the Green Belt, they are so closely related to the existing road that there would not be a material impact on the openness of

the Green Belt or the purposes of including land within it. Similarly with the other works to remodel the junction, including any new lighting columns or traffic lights that might be required, it is not considered that these would materially impact upon the openness of the Green Belt. The county council therefore considers that the development is acceptable in relation to the impact on the Green Belt.

14. Drainage and Flood Risk

- 14.1 The Environmental Statement includes a chapter examining the impacts on drainage and flood risk. This includes the effects of the scheme of ground and surface water quality, flooding and the land drainage regime.
- 14.2 Section 14 of the National Planning Policy Framework deals with planning and flood risk. It states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (the sequential test). Where development is necessary within such areas, the development should only be permitted where it would provide wider sustainability benefits that outweigh the flood risk and that the development will be made safe for its lifetime without increasing flood risk elsewhere and where possible will reduce flood risk overall.
- 14.3 The scheme area is located within the catchment of the River Wyre. The main surface watercourse located close to the road alignment is the Main Dyke but the scheme crosses a total of seven other water courses or field drains. The scheme crosses land located on the north side of Main Dyke that is at high risk of flooding (flood zone 3). Studies have shown that the main cause of flooding in this area is the twin culvert arrangement where the A585 crosses the Main Dyke and which restricts the flow of water during larger flood events. Flows in the Main Dyke are also influenced by the tidal nature of the River Wyre where high tides can prevent flood waters from flowing out into the estuary.
- 14.4 The part of the scheme aligned through the flood risk area is raised on embankment to ensure that the new road itself will not be at risk of flooding. However, this will result in a loss of flood plain capacity, potentially displacing floodwaters elsewhere, increasing the impact of flooding in existing flood risk areas or displacing water onto areas that do not currently flood.
- 14.5 The application is accompanied by a flood risk assessment. The aim of the sequential test is to steer development to areas with the lowest risk of flooding. However, it is necessary to balance this against the other environmental impacts of the scheme. It may have been possible to reduce the impacts on the flood plain by moving the road further away from Main Dyke. However, the road would then have been closer to the existing houses on Mains Lane leading to potential noise issues. A route to the north of Mains Lane would also reduce impacts on the flood plain but would have been closer to the Wyre Estuary raising potential ecological issues. The proposed alignment is therefore considered to pass the sequential test given the lack of other alternative routes.
- 14.6 Application of the exemption test in paragraph 160 of the National Planning Policy Framework requires demonstration that the development would provide wider

sustainability benefits to the community that outweigh the flood risk and that the development would be safe for its lifetime without increasing flood risk elsewhere.

- 14.7 To mitigate the impacts of flooding, a series of flood compensation areas would be constructed between the road alignment and Main Dyke. These would provide additional water storage to compensate for that lost due to the construction of the embankments within the flood risk area. However, the scheduling of construction would mean that the embankments would be constructed before these mitigation measures were provided which would lead to an increase in flood risk. To mitigate for this impact an area of land is included in the scheme immediately downstream of the A585 crossing which would be subject to regrading operations to provide floodplain storage to compensate for that lost. The rebuilding of the existing Skippool Bridge where the A585 crosses the Main Dyke would also have some flood benefits by removing the existing restrictions to flow.
- 14.8 Subject to the Environment Agency being satisfied, the county council therefore considers that principles of the scheme are acceptable in terms of flooding. The National Planning Policy Framework requires that development be safe for its lifetime and therefore it is considered important that the modelling of impacts and design of mitigation measures takes account of likely climate change and sea level rise predictions over the longer term. The requirements attached to any Development Consent order should also clearly set out the phasing of the flood mitigation measures that will be provided and also for their design and landscaping. It is not clear from the Environmental Masterplan drawings if the flood compensation areas would be retained in agricultural use or how these areas would be landscaped. The county council considers that there is potential for such features to be designed in such a way to become part of the ecological mitigation for the scheme and therefore contribute towards net ecological gain.
- 14.9 Road drainage would be managed by way of series of wetland features alongside the route. These would discharge into existing watercourse via new and existing outfalls. Attenuation would be provided to restrict rates of discharge and quality of discharged water. These measures are very similar to those which the county council has employed on its own highway developments and are considered acceptable.

15. Mineral Resources

- 15.1 Several parts of the road scheme are located within Mineral Safeguarding Areas. Policy M2 of the Lancashire Minerals and Waste Local Plan states that within these areas, planning permission will not be supported for any form of development that would prevent the working of the minerals unless it can be demonstrated that the mineral is no longer of any value, the mineral can be extracted satisfactorily prior to the development taking place, that prior extraction would not be feasible due to the depth of deposit would lead to stability problems or where there is an overriding need for the development that outweighs the need to avoid sterilisation of the mineral resource.
- 15.2 The applicant has undertaken a site investigation exercise which includes borehole analysis along the road alignment. This identifies that the superficial

geology along the majority of the route is comprised of silty clays or peat with only very localised occurrences of sand or gravel deposits which could be classified as a mineral resource. The site investigation would therefore appear to demonstrate that the mineral identified is not of any particular economic value.

15.3 Nevertheless, the proposals do provide for the creation of two borrow pits along the line of the route to provide bulk fill materials for construction purposes and which would reduce the requirement to import primary aggregate materials to the scheme. The scheme therefore provides for the prior extraction of mineral resources if these are considered to be technically suitable. In either scenario the tests in Policy M2 would therefore be satisfied.

16. Impacts on the Local Highway Network

16.1 The proposed new road would change the pattern of vehicle movements on the local highway network. The Environmental Statement includes a Transport Assessment which investigates the impacts on the local highway network including changes in traffic flow. The county council has a number of comments on this assessment as follows:

- The estimation of traffic impacts on local road that would be affected by the scheme has been based on various traffic models. However, the impacts and influences of the proposed highway on the wider road network such as within Poulton le Fylde is not always clear.
- The Transport Assessment is based on various baseline data sources where it is indicated that they are 8 to 10 years old and have subsequently been adjusted to 2015. It is considered that this is a potential weakness in the model and is outside of Department for Transport guidance for transport studies in Web TAG.
- There has been no *LINSIG modelling of the operation of the traffic light controlled junctions which is considered necessary to demonstrate how these junctions would work effectively.
*LINSIG is a software tool that allows traffic engineers to model traffic signals and their impacts on junction capacities)
- Section 5 of the Transport Assessment considers the future performance of the network. However, there is limited information on how some critical parts of the local highway network will operate. For example in the Transport Assessment Appendix A there are a number of diagrams showing how various roads will operate. For the A588 Breck Road (South of A585) in 2022 the AM peak flow is shown as -22% and – 11% in the PM. This suggests that some traffic reductions could be expected through Poulton. However, there is no further detail. For the A585 Garstang Road East (west of junction with proposed scheme) in 2022 AM peak flow is shown as +49% and PM flow +45%. Such increases would result in significant impact on the local highway network but no evaluation appears to have been carried out of the impact of such increases or how they might be mitigated.
- The modelling also shows an 11% increase in traffic during the AM peak in 2022 on Lodge Lane which is unexpected and which needs further explanation.

- On the A585 east of the Windy Harbour junction there would also be an increase in flow of 15% in the AM peak and 10% in the PM peak. There is a need to consider the impact of this increase and any mitigation along the A586 as far as the A6 junction particularly where the road passes through settlements (Great Ecclestone and particularly St Michaels on Wyre)
- There would also be increases in traffic on the A585 south of Windy Harbour in 2020 (AM peak flow of 13% and PM peak flow of 12%). This traffic would impact on the junctions north and south of the M55 particularly the Thistleton crossroads.
- The existing A585 east of the Shard Road junction would experience reductions in traffic in the region of 90%. This raises the question as to whether the traffic lights are still needed at this junction. Would a mini roundabout or some other junction layout be a better solution? The county council would not wish to take on the burden of having to maintain the traffic lights if a more cost effective solution would suffice.

16.2 The county council considers that the traffic modelling data shows that there are a number of locations on the wider highway network where there is a clear increase in traffic and where there is a need for further consideration of mitigation measures or improvement with associated funding provision.

16.3 The reduction in status of the existing A585 would require a review of various traffic regulation orders that apply to the route or require new orders to be implemented. This would include a review of the existing speed limits, prohibition of driving (at the eastern end of Garstang New Road) and parking orders. The cost of such orders and any resigning required to implement them is considered to be small in terms of the overall costs of the scheme. There are also some particular issues with the Orders that will be required which are as follows:-

- The proposed cycle route along the existing Mains Lane – it is expected that this would be advisory. If it were mandatory it would require a specific Order.
- The Environmental Statement indicates that the Mains Lane to Lodge Lane route would be restricted to access only. It is considered that this would be very difficult to enforce as this route provides a means of accessing Singleton, Weeton and a connection to the A585 via the B5269 at Thistleton crossroads. A weight restriction on this route might be a more practicable and enforceable alternative.
- It is expected that there would be a need for traffic calming on the existing Mains Lane to create a self-enforcing 30mph road.

16.4 The county council has also reviewed the designs of the new junctions from a capacity and safety perspective. The following comments are made in relation to the design of the new junctions:-

- Skippool Junction – it is considered that there would be poor alignment for north - south traffic giving rise to a potential safety issue. A safety audit is required to demonstrate that the design of this junction would operate satisfactorily. A swept path analysis and LINSIG modelling is required to demonstrate that the junction operates satisfactorily. It is also considered

that the junction design is potentially confusing for cyclists. There is also a need for further detailed design work in relation to the traffic signal head locations.

- Skippool Bridge Junction: LINSIG modelling of the junction is required.
- Poulton Junction; Again there is no LINSIG modelling of this junction.

- 16.5 It is proposed to establish a shared pedestrian / cycle route along the existing A585. The bypass would not have any cycle provision. The county council notes the representations that have been made by Cycling UK objecting to the lack of dedicated cycling provision along the new road. As a point of general principle, the county council considers that establishing a shared cycle / pedestrian path along the existing A585 is preferable to provision along the new road. Given the reduction in traffic on the route, the existing A585 would be a more pleasant environment for cyclists and would be a shorter route between the eastern and western ends compared to the bypass. The section of the A585 between Singleton junction and Windy Harbour is a very wide road and it is not considered that the issues of mud and encroachment of vegetation would be particular issues for cyclists. Provided that the new shared cycle / pedestrian route is suitably surfaced and incorporates satisfactory and safe crossing facilities across the new road, it is considered that the proposals for cyclist and pedestrian provision are acceptable.
- 16.6 The county council has reviewed the cycle provision and considers that there will be a need for Toucan crossings in the following locations: at the modified Shard Road junction as a minimum on the west side (arising from the traffic flows being higher), on the east side of the proposed Skippool Bridge junction, at the Skippool junction, at Poulton junction on the north side and at the modified Singleton junction.
- 16.7 It is also proposed that the existing A585 would be detrunked after construction of the new road and that responsibility for the road would then transfer to the county council. As part of the scheme, a number of changes are proposed to the existing A585 in recognition of the reduction in traffic levels and changed status of the route. These changes have a number of implications for the county council as highway authority.
- 16.8 Representations have been made in relation to the impacts of the new bypass on bus services that currently serve the settlements that would be bypassed particularly in relation to the Blackpool to Lancaster service. The resident considers that the service operator will not wish to extend the bus journey distance by travelling into Little Singleton and then having to loop back to join the bypass. He considers that the road scheme should incorporate a turning lane / bus gate at its eastern end so buses can continue to use the existing road as at present. If the service no longer serves the communities along the existing A585, the resident considers that this would be a retrograde step when the policy should be to encourage greater use of public transport.
- 16.9 The comments of the resident are noted. However, the county council considers that provision of an additional junction on the bypass to allow buses access onto the existing A585 would add additional delay thereby affecting the economics of the scheme. In relation to the bus services, the county council has discussed this

with the operator involved who has indicated that they would not continue to serve Little Singleton given the extra distance needed to travel to this settlement and then loop back onto the bypass and taking into account the limited number of customers boarding / alighting in the Little Singleton area. However, the existing bus services that serve the western end of Mains Lane and then travel to Knott End along the A588 would continue and there is a possibility that the routes of other existing supported bus services in the area could be modified so that they serve the Little Singleton area. The construction of the bypass would therefore not result in a complete loss of public transport services to this area.

17. Consideration of Alternatives

17.1 The Environmental Impact Assessment Regulations require a developer to explain the alternative options that have been investigated during the development of the proposed scheme. The Environmental Statement for the proposed A585 improvement contains details of the alternative options that have been considered prior to the selection of the proposed development as the applicant's favoured option. The alternative options that have been considered are comprised of:-

- Five different options for a bypass south of the existing Mains Lane
- Two options for a bypass north of the existing Mains Lane
- Two options for on line improvement.

A further southern bypass was also proposed by local residents during consultation during 2016 involving a route much further to the south than any of the options proposed by the applicant.

17.2 The southern options studied by the applicant were all variations of the proposed route such as a single carriageway option, a version with an at grade junction with Lodge Lane, an amended link with the existing A585 or combinations of these. These options have all been dismissed by the applicant due to them having reduced safety and economic benefits compared to the proposed scheme.

17.3 The northern bypass options were discounted due to their longer distance and additional junctions required. There would have also been closer to the Wyre Estuary than the proposed scheme therefore raising ecological issues.

17.4 The on line improvement was dismissed as it would not have met the scheme objectives for reducing traffic on the existing Mains Lane and improving journey reliability.

17.5 The southern option proposed by local residents would be significantly longer and would potentially have greater impacts on Singleton village.

17.6 Taking into account these considerations, the county council considers that the proposed development does offer significant advantages over the other alternatives that have been put forward in terms of the potential benefits of the scheme and also minimising environmental impacts.

18. Comments on Draft Development Consent Order

- 18.1 The applicant has included a copy of the draft Development Consent Order which would be made by the Secretary of State should he be minded to grant the application. The draft Development Consent Order deals with a wide range of issues including the various statutory consents that would be required to construct the road, compulsory purchase powers and a list of the Requirements that would be attached to any Order to regulate the development.
- 18.2 The county council notes from the Book of Reference and the Land Plans that a significant number of its land holdings are proposed to be acquired by the developer in order to construct the scheme. In the main these are comprised of existing highway and land adjacent to the highways but also includes a property known as West Winds (plot 1/38a). The county council considers that the right approach has been taken in terms of acquiring the rights to the surface and subsoil of existing highways which equates with the approach that the county council has taken on its own highways schemes. However, the county council does not believe that the right approach has been taken where existing highways cross watercourses. The county council does not consider that ownership of the highway means that it is also riparian owner of half of the water course on adjacent land. The county council is listed as owner in plots 07, 32a and 38a which may not be the case.
- 18.3 Article 34 – Tree and Shrub removal. This article permits the undertaker to remove or fell any tree or shrub within the Order limits unless it is identified as being retained in the Environmental Statement. The county council could not see any evidence within the Environmental Statement on a plan or plans which accurately define the trees and shrubs to be retained and those to be removed. A similar issue applies in relation to Article 37 although here there is no reference to the Environmental Statement.
- 18.4 The county council has the following comments on the wording of the requirements in schedule 2 of the Development Consent Order:-
- Many of the requirements require the applicant to submit further schemes of details for matters such as landscaping, drainage and archaeology. These requirements are worded such that the Secretary of State is responsible for approving these details. The county council does not understand why it is necessary for these details to be submitted to the Secretary of State and why they cannot be 'delegated' to the local planning authority as has been the case with other Development Consent Order applications.
 - Requirement 4 - What is meant by the relevant planning authority? Is this Fylde BC or Lancashire County Council or both authorities. The Construction Environmental Management Plan will contain matters of interest to the county council in terms of a number of issues including highways and flooding and it is therefore considered that the county council should be included within the definition of relevant planning authority.
 - Requirement 5 – this Requirement only seems to deal with tree and hedge planting and there is no requirement to submit details on any other aspect of the landscaping such as pond replacement, design of new ditches, ecological mitigation measures or restoration of the temporary compound areas.

- Requirement 10 – it is assumed that this relates to construction traffic. The requirement might benefit from some more detail so it is more precise in detailing the information that is required.
- The county council considers that there are a number of other matters that should be subject to Requirements. These include tree and hedgerow protection for the vegetation outside of the working area, provision of the temporary bird mitigation land and control of the management works that are to take place within that land, flooding issues in terms of the provision of the mitigation measures and surfacing materials to be used for the road.

19. Conclusions

- 19.1 The county council considers that the National Policy Statement for National Networks establishes the need for targeted improvements to the trunk road network in order to relieve congestion, improve journey time reliability and support economic growth. The proposed development is therefore supported by the National Policy Statement.
- 19.2 The policies of the local development plan, local transport plan and associated documents also support the principle of an improvement to the existing A585 in order to improve connectivity between the motorway network and the Fleetwood peninsula. The county council considers that the proposed improvement scheme would assist in meeting the aspirations of those policies and would not prejudice the future ability to improve the whole of the route should funding be forthcoming for such works.
- 19.3 The route that has been selected is considered to be the best available in terms of maximising the traffic and economic benefits of the route and minimising environmental impacts.
- 19.4 The scheme would give rise to a number of local environmental impacts which is to be expected given the scale of the scheme proposed. There does not appear to be any individual local environmental impact that would be so severe to make the proposed development unacceptable. However, the county council considers that it is important to ensure that the scheme and its associated mitigation is designed in such a way as to minimise its impacts. The Examining Authority should therefore assure itself that the mitigation in relation to landscape impacts, ecology and noise impacts (particularly on local residents close to the route) are sufficient and would be effective in addressing the environmental impacts of the development.